

Before reading the rest of this privacy policy further below, please note the following preliminary terms:

The “**L@W Group of Companies**” (hereinafter referred to interchangeably as either “L@W”, “our”, “us”, or “we”) means:

- (i) **LAW Active (Pty) Ltd**, South African company registration number 2006/027343/07, and/or
- (ii) **LAW Active Ireland Ltd**, Irish company registration number 406117, and/or
- (iii) **LAW Active UK Ltd**, English company registration number 5364834, and/or
- (iv) **LAW Compliance (Pty) Ltd**, South African company registration number 2006/027343/07, and/or
- (v) **LAW Credit (Pty) Ltd**, South African company registration number 2001/004364/07, and/or
- (vi) **LAW Credit Solutions (Pty) Ltd**, South African company registration number 2004/003787/07, and/or
- (vii) **LAW Deed Solutions (Pty) Ltd**, South African company registration number 2004/004195/07, and/or
- (viii) **LAW FICA Solutions (Pty) Ltd**, South African company registration number 2008/005873/07; and/or
- (ix) **LAW Holdings (Pty) Ltd**, South African company registration number 1995/013349/07, and/or
- (x) **LAW Trusted Third Party Services (Pty) Ltd**, South African company registration number 2001/004386/07, and/or
- (xi) **Lawyers Access Web Namibia (Pty) Ltd**, Namibian company registration 2004/548, and/or
- (xii) any of their holding companies, subsidiaries, as well as subsidiaries of their holding companies from time to time, as the case may be.

“**You**” and/or “**your**” means you, the viewer of our website(s).

“**L@W staff**” means any of L@W’s directors, employees, agents, contractors and/or consultants, as the case may be.

This privacy policy covers our corporate web sites at [www.lawactive.co.za](http://www.lawactive.co.za), [www.lawtrust.co.za](http://www.lawtrust.co.za), [www.cyberdebt.co.za](http://www.cyberdebt.co.za), [www.ficacard.co.za](http://www.ficacard.co.za), as well as any other L@W websites, and includes information given to any of the L@W staff.

Should any of the provisions of this privacy policy conflict with any terms and conditions contained in any agreement you have concluded with L@W then the terms and conditions, to the extent of any conflict, contained in such agreement shall prevail.

## **1. YOUR RIGHT TO PRIVACY AND SECURITY**

We value your right to privacy and security. Through your use of our website(s), your personal information is treated as private and confidential. We are and remain committed to providing you with secure access to our services. We want you to use our website with complete confidence, and make your experience on our website as rewarding as possible.

We collect information in different ways from visitors and subscribers who access our website(s) and make use of our services. We use this information primarily to provide a better and more customised service to you in a closed business community. We only, with your knowledge and consent, disclose personal information to third parties in line with the provision of the services we provide.

## **2. INFORMATION COLLECTED**

We are acutely aware of and sensitive to the right to privacy of our subscribers and other visitors to our websites. Whether as a subscriber, or a visitor, we do not collect personal information unless you decide to disclose it to us.

There are 3 ways in which you provide us with your personal information: (i) e-mail, (ii) downloading a digital certificate, and (iii) subscribing to a service offered.

### **2.1 ON REGISTRATION**

When registering with L@W, the personal information requested from you includes your name, address, telephone number, e-mail address, bank account to be debited, type of personal computer used, and details of your software. We also ask you to choose a password and a user name. This personal information is used to enable us to meet our obligations to you, follow your instructions, and ensure our services meet your needs.

### **2.2 APPLYING FOR A DIGITAL CERTIFICATE**

The personal information requested from you when you apply to be issued with a digital certificate is to enable us to verify and confirm your identity before creating your digital certificate. Verifying and confirming your identity requires us to compare the personal information submitted by you in your application with information known to a third party (e.g. the Law Society, Estate Agency Board, Bank, and the like). This allows us to prevent identity theft and to maintain the integrity of digital certificate usage in the L@W community. Publication of a digital certificate is at an accessible location and is an integral part of enabling the widespread use and acceptance of digital certificates. Your digital certificate will be generally accessible by third parties who seek to confirm and rely on your identity as shown in your digital certificate.

### **2.3 ACCOUNT / BANK INFORMATION**

This personal information is only used to (i) issue you with invoices in terms of any agreement concluded with us, and (ii) to debit your bank account with any amounts that may be due to us in terms of any agreement concluded with us.

### **2.4 E-MAIL REQUEST – RESPONSE / FEEDBACK / SUPPORT**

Your e-mail communication to us (for example job information or general inquiries) is retained for tracking purposes, and will not be used for any secondary purpose, e.g. sending unsolicited e-mail.

### **2.5 CALL CENTRE**

We operate an in-house call centre with a sophisticated data management system. The personal information obtained is to track and monitor operational issues, with a view to providing you with quality service and support. This includes assisting you with upgrades or advising you of news items, conferences, digital certificate renewals, and the like.

### **2.6 VOLUNTARY SURVEYS/CONFERENCE FEEDBACK**

We may contact you to obtain feedback or to participate in a business or individual customer survey. We do so to obtain important information that helps us to improve our service offering to you. Any personal information and responses submitted are kept private and confidential. Participation in these surveys is voluntary. You decide (i) whether you wish to participate, and (ii) the nature of the information you choose to disclose. Survey information is used for statistical purposes and to improve our service offering to you.

### **2.7 COOKIES**

A cookie is a small piece of data or a text file which is given to your browser by our server when you visit our website(s). It is stored on your computer, and is sent back to our webserver each time you visit our website(s), and thereby enables us to keep track of your use of our website(s). Through cookie technology we can only track certain information about you (such as IP address, browser type, and the URLs that you came from and go to next) based on your activity on our website(s). We use this information to help diagnose problems with our server, improve our marketing efforts, analyse website usage, improve content offering, and customise our services. If your browser is set to reject cookies, some parts of our website(s) and our services may not function properly, or at all. We therefore encourage you not to disable cookie technology when interacting with us.

### **3. DISCLOSURE OF PERSONAL INFORMATION**

We may use your personal information to contact you for support, renewal, upgrades and subscription to new services. Please be assured that if you are contacted by any of the L@W staff, they have agreed to keep your personal information private and confidential. This is in accordance with strict confidentiality agreements signed with the L@W staff.

We will not disclose your personal information to a person who is not a member of the L@W staff without your permission unless (i) we are compelled by law or in terms of a court order to do so, or (ii) it is in the public interest to do so, or (iii) it is necessary to protect our rights.

Personal information used to compile profiles for statistical purposes is only shared where such data cannot be linked back to your personal information.

### **4. LINKED WEB SITES**

Our website(s) have hyperlinks to other third party website(s). The privacy practices, privacy policies and other issues regarding these website is outside our control and you must make your own informed decision on whether or not to make use of the services offered therein.

### **5. LAWFUL PURPOSES**

preventing exposing others to material which is offensive, harmful to minors, indecent or otherwise objectionable is especially important to us. It is our policy to ensure that we comply with all applicable laws in this regard.

### **6. SECURITY**

Personal information collected by us is stored in a secure environment and is not available without your consent to any person who is not a member of the L@W staff. We use encryption technology that complies with international standards to protect storage and transmission of your personal information. Our web servers have firewall protection and intrusion detection systems. Access to information on these web servers is restricted to authorised L@W staff only.

### **7. DATA RETENTION**

L@W will not retain your personal information longer than is necessary for the purpose for which it was collected. The periods of retention are based on your requirements.

## **8. REMOVAL FROM MAILING LIST**

When you subscribe to L@W, you consent to a specific notice period in respect of termination of the service. Upon termination, your name will be removed from our regular contact lists, but you may on occasion receive marketing material or be contacted by a member of the L@W staff. You are free to contact us through our call centre, instructing us not to contact you further. Should you wish to access or to modify your information, we would suggest that you do so through the call centre on +27 (0)860 877 877 or +27 (0)11 731 8000.

## **9. CONTACTING L@W**

Contact the support team at [support@lawactive.co.za](mailto:support@lawactive.co.za). and/or address any queries to [info@lawactive.co.za](mailto:info@lawactive.co.za)

## **10. REVISIONS TO THIS POLICY**

L@W reserves the right to change or amend this privacy policy at any time without prior notice. Changes will be posted on the websites from time to time. If you have any questions about this privacy policy or the practices described herein, you may contact Grant Christianson on +27 (0)11 731 8000 or [gchristianson@lawactive.co.za](mailto:gchristianson@lawactive.co.za).

## **11. WEBSITE MAINTENANCE**

The L@W website(s) are maintained and updated by the IT Department of L@W. Should you have any queries in this regard, please contact: Craig Leppan, Chief Technical Officer, on +27 (0)11 731 8000 or [cleppan@lawactive.co.za](mailto:cleppan@lawactive.co.za).