

# PRIVACY POLICY

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## Table of Contents

Basic Principles .....	2
What is personal information? .....	2
Consent.....	3
What information do we collect from you? .....	3
How do we collect information about you? .....	3
How do we use your information? .....	4
How long do we keep your information for? .....	4
Disclosing your information to third parties.....	5
Cross-border transfer of your information.....	5
Cookies .....	6
How can you refuse or opt out of cookies?.....	7
Cookies set by Third Parties .....	7
Website sharing tools.....	7
Cookies set by Suppliers.....	7
Linking .....	8
Security.....	8
Access, modification and deletion of your information .....	8
General .....	9

## Introduction

Set out below are details about the GraySwan privacy policy (“Policy”). This Policy applies to the collection, use, disclosure and protection of personal information relating to clients of GraySwan and its group companies; all vendors, suppliers, and employees of GraySwan; and all users of our website: [www.grayswan.co.za](http://www.grayswan.co.za).

## Basic Principles

- At GraySwan we respect and take your privacy seriously, and as such we will use and process the personal information that we collect from you in accordance with this Policy.
- We collect and process your personal information for lawful purposes which are related to the functions and business activities of GraySwan.
- We undertake to collect and process your personal information in a reasonable manner, and in such a way that the processing is adequate, relevant and not excessive.
- We also undertake to take reasonable steps to ensure that the personal information that you provide to us remains accurate.

## What is personal information?

- When we refer to personal information in this Policy, we mean information that can identify you as an individual. By personal information we do not mean general, statistical, aggregated or anonymous information or other data that does not, alone or with other data, identify a specific individual.
- We collect personal information from you when you voluntarily provide such information on the website, for example, when you register on the website, contact us with enquiries or use the products and/or services provided by GraySwan.

## Consent

- If you choose to provide us with personal information, you are consenting voluntarily and on an informed basis to GraySwan's collection, processing and storage of that personal information.

## What information do we collect from you?

GraySwan collects and stores the following personal information:

- Email address, phone numbers, physical contact information, and (depending on the service used) sometimes financial information;
- Computer sign-on data, statistics on page views, traffic to and from the website and ad data (all through cookies - you can take steps to disable the cookies on your browser although this is likely to affect your ability to use the website); and
- Other information, including users IP address and standard web log information.

## How do we collect information about you?

- In general, you may provide personal information to us when communicating with us.
- When you register with GraySwan on the website, you will be asked to provide certain personal information, including your name, address, and contact details.
- GraySwan uses the information that you provide to us during registration to enhance your experience, and to communicate with you.
- We will collect information concerning your likes and preferences both when you tell us what these are and through our analysis of client traffic, including through the use of cookies (as described below).
- We will always endeavour to secure the integrity and confidentiality of your personal information which is in our possession or under our control.

## How do we use your information?

Personal information which you provide to GraySwan may be used:

- To provide products or services you have requested;
- To respond to and follow up on your inquiries or complaints;
- To update any records held about you;
- To improve or detect any unlawful activities;
- To evaluate the effectiveness of GraySwan's marketing and for the purposes of research and statistical analysis in order to improve GraySwan's products and services;
- To meet a legal or regulatory obligation.
  
- We may use your information to confirm that you have received the products or services for which you registered; to validate you as a client when using our services; to prevent and detect criminal activity, fraud and misuse of or damage to our services or networks; to prosecute those responsible; or to contact you to provide additional information regarding our business and services.
- We may also use your personal information and process such information for the purposes of management, research, analysis, corporate reporting and improving business efficiencies.
- We may use personal information collected about you to contact you by post, telephone and electronic mail (that is e-mail, picture, video, and SMS) about functionality changes to the website, services or changes to our terms and conditions and to communicate with you about your client benefits and advise you regarding the use of our services.
- We may use the information collected about you to contact you by telephone or electronic email about new client offers and services, subject to any preferences selected by you.

## How long do we keep your information for?

- The time periods for which we keep your personal information may vary according to the use or purpose attached to the information. Unless there is a specific legal or compliance requirement mandating us to keep your information, we will not keep it for longer than necessary for the purpose for which the information was collected or for which it is to be processed.

## Disclosing your information to third parties

GraySwan will not share your personal information with third parties unless:

- We have your consent to do so for the purpose of providing a product or service;
- The disclosure is required to meet a local or international regulatory or tax authority requirement;
- The disclosure is required to meet a legal or regulatory obligation;
  
- GraySwan does not sell or rent your personal information to third parties for their marketing purposes.
- We reserve the right to access and disclose individual identifying information to third parties to comply with applicable laws, regulations and lawful government requests, to operate GraySwan's systems properly or to protect GraySwan or its users or to solve any client disputes.
- We may provide aggregate statistics about our products, sales, customers, traffic patterns and other website information to third parties, but these statistics will not include any information that could personally identify you.
- We may from time to time elect to make use of other organisations to provide some of our services, and our services will then be offered through third party service providers on the website. We may then share your personal information with these organisations. These organisations can and will process this personal information and will be obliged to keep such information confidential and to carry out the processing in reasonable manner that does not infringe your privacy. We will destroy records that are no longer required for processing or required to be maintained by regulation or law.

## Cross-border transfer of your information

GraySwan maintains collaborative relationships with various domestic and international vendors, subcontractors, strategic partners, and others who assist GraySwan and our clients in the conduct of our respective businesses. From time to time, GraySwan may transfer personal information to these parties to enable them to work with GraySwan, but GraySwan requires that they maintain the privacy of personal information in a manner satisfactory to GraySwan and consistent with applicable law.

- GraySwan will ensure that whenever personal information is transferred to foreign countries, it will remain adequately protected.
- It is GraySwan's policy not to transfer personal information to any entity, individual, or organisation

located in countries that do not provide an adequate level of data protection, unless:

- you have given your consent;
  - the transfers are needed to enter into or perform a contract with you;
  - the transfers are needed for the conclusion or performance of a contract concluded in your interest;
  - the transfers are made pursuant to approved written contracts or a set of binding corporate rules which protect your rights; or
  - the transfers are permitted under applicable law.
- Personal information transferred to another country may be subject to all the laws of that country, including laws related to money laundering, corruption and bribery, national security and anti-terrorism, which may permit local law enforcement or regulatory agencies to obtain access to information held by private businesses.

## Cookies

- GraySwan may also collect personal information through the use of “cookies” in order to provide better client service. A cookie is a piece of information that is stored on your computer’s hard drive by your web browser for record- keeping purposes. On revisiting the website, our computer server will recognise the cookie, giving us information about your visit.
- During the registration process we allocate cookies for our services. These cookies will hold information collected during your registration and will allow us to recognise you as a client and provide you with the services you require. If your browser is set to reject cookies, you may not be able to register for our services. We may also use this data to better understand your interests while online and to personalise your visits to the website.
- In addition, when you use the website, GraySwan automatically receives and records information on our server logs from your browser or mobile platform, including your location, IP address, cookie information, and the page you requested. We treat this data as non-personal information, except where we are compelled to do otherwise by law or legal authority.
- GraySwan will use this data in aggregate form to determine how users make use of the website and to identify areas for improvement.

## How can you refuse or opt out of cookies?

- Most browsers are set by default to accept cookies automatically, but you can alter the settings of your browser to prevent automatic acceptance and to prompt you every time a cookie is sent to you or to allow you to choose not to receive cookies at all. Turning off cookies will not prohibit you from using the website, it may however limit your use of the website.

## Cookies set by Third Parties

- To support our website we sometimes embed photos and video content from websites such as YouTube and Flickr. As a result, when you visit a page with content embedded from, for example, YouTube or Flickr, you may be presented with cookies from these websites. GraySwan does not control the dissemination of these cookies. You should check the third party websites for more information about these.

## Website sharing tools

- The GraySwan website has embedded 'share' buttons to enable users of the site to easily share articles with their friends through a number of popular social networks. These sites may set a cookie when you are also logged in to their service. GraySwan does not control the dissemination of these cookies and you should check the relevant third party website for more information about these.

## Cookies set by Suppliers

- GraySwan uses Google Analytics a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of the websites and compile reports for us on activity on the website.
- Google stores the information collected by the cookie on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using the Investec websites, you consent to the processing of data about you by Google

in the manner and for the purposes set out above.

For more information on the cookies set by Google Analytics, including information on how to opt out please go to: <http://www.google.com/intl/en/privacypolicy.html>

## Linking

- We may link to other websites which are not within our control. Once you have left our website, we are not responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement applicable to the third party's website in question.

## Security

- GraySwan uses different technology, tools and procedures (for example, passwords and physical security) to protect your personal information against unauthorised access and disclosure, however, GraySwan makes no representations or warranties whatsoever in this regard.

## Access, modification and deletion of your information

- You have the right at any time to request that we confirm the personal information which we hold about you, and to request that we correct any incorrect or inaccurate personal information which we hold about you.
- In addition, you can see, modify or erase most of your personal information by contacting us to review any personal information that GraySwan holds about you.
- You have a right to object to the processing of your personal information where that processing is carried out for our legitimate interests.
- Where required by applicable law, where we send you direct marketing, we will obtain your consent for this, which you may withdraw at any time.

- If you would like us to stop processing your personal information for marketing purposes, please write to us at [informationofficer@grayswan.co.za](mailto:informationofficer@grayswan.co.za).

## General

- This Policy is governed in all respects by the laws of the Republic of South Africa.
- GraySwan reserves the right to update or modify this Policy at any time, and from time to time, without prior notice to you. Please review this Policy periodically, and especially before you provide any personal information to GraySwan. This Policy was last updated on the date indicated above. Your continued use of the website after any changes or revisions to this Policy shall indicate your agreement with the terms of such revised Policy.
- This document describes GraySwan's privacy policy. However, this Policy does not grant or create any additional rights or remedies for users of the website or any data subjects (as this term is used under applicable law), or any additional obligations on the part of GraySwan other than those obligations required by applicable law.