



Cognia

Privacy Notice

COGNIA LAW PRIVACY NOTICE

INTRODUCTION

Cognia Law UK Limited and Cognia Law (Pty) Ltd (together, "**Cognia**") together with any subsidiaries and affiliates is an international law company. We are committed to protecting the privacy of information provided to us and information about our employees, visitors to our Cognia website (www.cognialaw.com), visitors to our premises, our service providers and / or the clients to who we provide our services.

This privacy notice (the "**Privacy Notice**") aims to help you understand our personal information collection practices, the grounds that justify our use of your personal information and your rights in relation to that information. We may provide you with further notices highlighting certain uses we wish to make of your personal information together with the ability to opt in or out of selected uses may also be provided to you when we collect personal information from you. This Privacy Notice supplements other notices and privacy policies we may provide to you from time to time and is not intended to override them. Your use of our online services or your provision of information to us constitutes your acknowledgment of the terms of this Privacy Notice. Please do not send us any of your information if you do not want it to be used in the ways described in this Privacy Notice.

"**personal information**" as used in this Privacy Notice means information that identifies, relates to, describes, or can reasonably be linked, directly or indirectly, to a specific natural person, or where applicable, juristic person. It does not include information that is considered anonymous, de-identified, or aggregated by applicable law.

Our contact details are set out at section 13 below.

1. What personal information we collect about you

We may collect and process different types of personal information in the course of operating our business and providing our services. These include:

- Basic personal details such as your name and job title;
- Contact information such as your telephone number and postal or email address;
- Financial information such as payment related information, vat registration number or bank account details;
- Demographic information such as your address, preferences or interests;
- Website usage and other technical information such as details of your visits to our websites or information collected through cookies and other tracking technologies;
- Personal information provided to us by you or generated by us in the course of providing our services, which may, where relevant, include special personal information;
- Identification and other background verification information such as a copy of passports or utility bills or evidence of beneficial ownership or the source of funds to comply with client due diligence/"know your client"/anti-money laundering laws and collected as part of our client acceptance and ongoing monitoring procedures;
- Recruitment related information such as your curriculum vitae, your education and employment history, details of professional memberships and other information relevant to potential recruitment to Cognia;
- Information that you may provide to us in course of registering for and attending events or meetings, including access and dietary requirements; and
- Any other personal information relating to you that you may provide.

2. How we obtain the personal information

We may collect or receive your personal information in various ways:

- Where you provide it to us directly, for example by corresponding with us by email, or via other direct interactions with us such as completing a form on our website or registering for and using one of our online tools;
- Third party sources, for example, where we collect information about you to assist with “know your client” checks as part of our client acceptance procedures or where we receive information about you from recruitment agencies for recruitment purposes; or
- Publicly available sources – we may, for example, use such sources to help us keep the contact details we already hold for you accurate and up to date or for professional networking purposes.

3. Legal grounds and use of your personal information

Legal Grounds for Processing

Certain jurisdictions require us to have legal grounds to process your personal information. Where applicable law requires us to justify our processing activities, we rely on the below legal grounds:

- **Performance of a contract:** it is necessary for the performance of a contract with you or the organisation you work for;
- **Legal obligation:** necessary to comply with our legal or regulatory obligations or authorised by law;
- **Consent:** you have provided your consent (where necessary) to such use or the organisation that you work for has obtained your consent (where necessary);
- **Legitimate interests:** we (or a third-party) have a legitimate interest which is not overridden by your interests or your data protection rights.

Use of Information

We may use your personal information in the following ways:

- **Provide and improve our services and products to you and to conduct our business:**
 - administer the use of our services and to perform our service, including to carry out obligations arising from agreements entered into between you and us;
 - maintain and develop our relationship with you and our clients;
 - monitor and analyse our business; or
 - facilitate our internal business operations.
- **Facilitate the use of our website and to ensure our content is relevant:**
 - by responding to requests for information or enquiries from visitors to our website; or
 - to ensure that content from our website is presented in the most effective manner for you and for your device.

- **Fulfil our legal, regulatory, or risk management obligations:**
 - to comply with our legal obligations (including in relation to client due diligence, “know your client”, identifying conflicts of interest, anti-bribery and anti-money laundering or sanction requirements), accounting, reporting, risk management or professional obligations; or
 - to enforce our legal rights, to comply with our legal or regulatory reporting obligations and / or to protect the rights of third parties.
- **Marketing and business development purposes:**
 - identify and provide you with new services you may be interested in; or
 - publications, marketing and invites to seminars or events where you have chosen to receive these (please see section 11 for more information).
- **Recruitment purposes:**
 - to process applications of employment submitted via our website and to assess your suitability for any position for which may apply at Cognia.
- **To ensure that we are paid:**
 - recover payments due to us and where necessary to enforce such recovery through debt collection agencies or taking other legal action.
- **To inform you of changes:**
 - notify you about changes to our services or our Standard Terms of Engagement for services or this Privacy Notice.

We may not be able to do these things without your personal information. Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform in terms of the contract we have with you or are trying to enter into with you (for example, to provide you with our services). In this case, we may not be able to proceed with a particular engagement we have or intended to have with you (this may include cancelling service you have with us), but we will notify you if this is the case at the time.

4. Sharing personal information

We may share your personal information with our Cognia offices, branches, subsidiaries and affiliates located in jurisdictions around the world (please see our website (www.cognialaw.com/get-in-touch/) to view our office locations). If, in the future, we re-organise or transfer all or part of our business, we may need to transfer your personal information to new entities or third parties through which our business will be carried out.

We may share your personal information with third parties including:

- Our professional advisers (for example, legal, financial, business, risk management or other advisers), bankers and auditors;
- Our insurers and insurance brokers;
- Third party service providers; and/or
- Other third party external advisers or experts engaged in the course of the services we provide to our clients and with their prior consent.

We may also process your personal information to comply with our regulatory requirements or in the course of dialogue with our regulators as applicable, which may include disclosing your personal information to government, regulatory or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, or unless to do so would prejudice the prevention or detection of a crime, we will direct any such request to you or notify you before responding

5. Transfer personal information

We cannot limit our processing of your personal information to the country in which you are based. In the course of providing our services, we will likely need to transfer personal information to locations outside the jurisdiction in which you provide it or where you are viewing our website.

Regardless of the location of our processing, we will impose the same data protection safeguards globally and implement appropriate measures to ensure that your personal information is protected in accordance with applicable data protection laws. Similarly, where a third-party service provider processes the personal data on our behalf, we will ensure that appropriate measures are in place to ensure an adequate level of protection for your personal information.

6. We keep your personal information

We will only retain your personal information for as long as is reasonably necessary to fulfil its purpose for which the information was collected and other permitted linked purpose. If your personal information is used for two purposes, we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period once that period expires. Our retention periods are also based on our business needs and good practice.

7. Protect your personal information

We recognise that information security is an integral part of data privacy. While no data transmission can be guaranteed to be secure from intrusion, we take reasonable steps to help protect personal information in electronic or physical form and to prevent unauthorised access, use, modification or disclosure. Our information security policy is supported by a number of security standards, processes and procedures and we store information in access controlled premises or in electronic databases requiring logins and passwords. We require our third-party data storage providers to comply with appropriate information security industry standards. All partners and staff and third-party providers with access to confidential information are subject to confidentiality obligations.

The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services; any transmission is at your own risk.

8. Use cookies

We use cookies on our online services. Please see our Cookies Policy for details.

9. Third party sites

Our websites contain links to other sites which are controlled by third parties.

Visitors should consult these other sites' privacy policies and please be aware that we do not accept responsibility for their use of information about you.

10. Your rights in relation to your personal information

If you have any questions about our use of your personal information, you should first contact us via the details provided in section 13 below. We operate in jurisdictions that impose varying obligations and that grants you different levels of protection, particularly with respect to personal information. Depending on applicable law, you may have certain rights with respect to your personal information, including, for example, the rights to:

- have your personal information lawfully processed;
- request access to certain personal information of yours that we process;
- update or correct your personal information if you believe it is incomplete or inaccurate;
- request, where necessary, the correction, destruction or deletion of your personal information, subject to certain exceptions under local law;
- object to our processing of your personal information or otherwise restrict our processing activities;
- restrict certain transfers of your personal information to third parties;
- withdraw your consent to processing, where we base our processing of your personal information on consent;
- not be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you
- not have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications; and
- Submit a complaint to your local supervisory authority or regulator in your jurisdiction.

You may also instruct us not to process your personal information for marketing purposes. For more information, please section 11 below.

You can exercise your rights (if applicable), by submitting a request via our [form found here](#), alternatively, if you are unable to submit the form, our contact details are available in section 13 "**Contact Information**" below.

Please note that all requests will be attended to within a 30-day period. We may refuse to provide access and may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision as required by law.

11. Marketing information

If you receive marketing materials relating to our services by email or post, you may withdraw your consent for us to send these to you at any time, by using the "unsubscribe" option included in the email or other material. Alternatively, you can let us know your preferences by sending an email to enquiries@cognialaw.com or privacy@cognialaw.com.

12. Status of this Privacy Notice

We review this Privacy Notice regularly and reserve the right to revise it or any part of it from time to time to reflect changes in the law or technology practices. It is your responsibility to review the amended Privacy Notice.

13. Contact information

To find out more about Cognia office branches, please visit our website (www.cognialaw.com/get-in-touch).

If you have any questions about this Privacy Notice, or want to submit a written complaint to us about how we handle your personal information, please contact us at:

United Kingdom Offices

20 St Dunstan's Hill

London EC3R 8HL

United Kingdom

Telephone: +44 (0) 203 375 8624

Email: privacy@cognialaw.com or send us an email via our website (www.cognialaw.com/get-in-touch) "**Get in touch**" page.

Data Protection Officer

Attention: Justin Ridl

Telephone: +44 (0) 788 458 8282

Email: dpo@cognialaw.com or justin.ridl@cognialaw.com

South Africa Offices

2nd Floor, RedPanda Place,

Golf Park, 44 Raapenberg Road,

Mowbray, 7700, Cape Town,

South Africa.

Telephone: +27 (0) 21 100 3140

Email: privacy@cognialaw.com or send us an email via our website (www.cognialaw.com/get-in-touch) "**Get in touch**" page.

Information Officer

Name: Justin Ridl

Telephone: +27 (0) 21 100 3140

Email: privacy@cognialaw.com

If you are unsatisfied with the manner in which Cognia addresses any complaint with regard to Cognia Processing of Personal Information, you can contact the office of the relevant supervisory authority or regulator in your jurisdiction.

For more information contact:

Cognia Law

info@cognialaw.com

Contact No.

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www.cognialaw.com

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