

# PRIVACY POLICY

## 1. OVERVIEW

- 1.1. ASL Incorporated, ASL Trust Services Proprietary Limited, ASL Advisory Proprietary Limited and ASL Proprietary Limited defined as the "**ASL Group**", respects and protects the personal information and privacy of others.
- 1.2. This Privacy Policy ("**Policy**"):
  - relates to "Personal Information", which is any information (including an opinion) about an identified or identifiable person and/or juristic person;
  - it also extends to any information where you can be identified directly or indirectly, in particular by reference to an identifier (for example, a name or email address, or an online identifier such as a unique device identification number).
  - it may include information about ASL Group's employees and other third-party contractors or staff, shareholders, business partners, suppliers and customers; and
  - it explains how ASL Group collects, manages and utilises Personal Information, and how you can exercise your privacy rights.
- 1.3. ASL Group collects, manages and utilises Personal Information in accordance with applicable privacy laws, namely the *Protection of Personal Information Act, 2013* ("**POPIA**") and understands that the Personal Information of the people ASL Group deals with is important. That is why protecting Personal Information and being clear about what ASL Group does with it is a key part of ASL Group's business.

## 2. HOW DOES ASL GROUP COLLECT PERSONAL INFORMATION?

Broadly speaking, ASL Group collects Personal Information about you in the following ways:

### 2.1. Information that you provide voluntarily

At times, ASL Group may ask you to voluntarily supply Personal Information. For example, ASL Group may ask you to provide your contact details when you submit enquiries through the Contact Us page [<https://www.asl.co.za/book-a-consultation>]/on the ASL Group website or when you ask to receive information from ASL Group. ASL Group may also collect Personal Information during the course of ASL Group's business interactions with you, which includes any communications you may send to ASL Group.

## 2.2. Information that ASL Group collects automatically

2.2.1. When you visit the ASL Group website, or make use of ASL Group's services, ASL Group may collect certain information automatically from your device. Specifically, ASL Group may collect information such as your device type, unique device identification number, browser-type, broad geographical location and other technical information about you.

2.2.2. ASL Group uses this information for internal operations and analytical purposes and to improve the quality and relevance of the ASL Group website and services. Some of this information described above, may be collected using cookies and similar technology. Please see below for further information on ASL Group's use of cookies.

## 2.3. Information obtained from third party sources

In some cases, ASL Group may collect Personal Information about you from publicly available sources or from a third party, such as through your representatives, contractors who provide services to us, or other third parties who are entitled to share that information. In addition, where you have expressed an interest in career opportunities with ASL Group, we may obtain Personal Information provided to us by HR practitioners, hiring managers and recruitment advisors.

## 3. WHAT PERSONAL INFORMATION DOES ASL GROUP COLLECT AND WHY?

3.1. The Personal Information ASL Group collects is dependent on ASL Group's relationship with you.

3.2. ASL Group collects Personal Information from a range of individuals in the context of ASL Group's business activities, including shareholders, employees, job applicants, representatives of ASL Group's suppliers, customers, contractors, users of the ASL Group website, and visitors to the ASL Group offices.

3.3. The following table sets out the types of information ASL Group collects and why ASL Group uses it.

Type of Personal Information	Why does ASL Group use this information?
<b>Visitors to the ASL Group website</b>	

Type of Personal Information	Why does ASL Group use this information?
<p><b>Contact information:</b> such as, name; email; telephone number; address (this specifically includes information about the company that you represent) and the content of your free text query.</p>	<p>To respond to your queries and requests, to provide you with a subscription to the ASL Group newsletter,</p>
<p><b>Technical information:</b> such as device type; unique device identification numbers; browser type; broad geographical location.</p>	<p>To monitor the use of ASL Group's services and to assess, maintain, upgrade and improve ASL Group's services, to carry out market analysis and research, to carry out planning and forecasting activities and for other internal business processes.</p>
<p><b>Visitors to ASL Group's physical offices</b></p>	
<p><b>Identification information:</b> such as, passport or national form of identification; name; contact details; employer information.</p>	<p>To verify your identity, to enable you to enter ASL Group's offices, and to undertake adequate due diligence.</p>
<p><b>Information obtained during your visit:</b> such as, CCTV images, car registration information, access records and registration details</p>	<p>To allow you access to ASL Group's offices in line with ASL Group's security policies and procedures and to manage and resolve any legal or commercial complaints or issues, including security incidents.</p>
<p><b>ASL Group employees and contracted staff</b></p>	
<p><b>Identification data:</b> such as your name, gender, photograph, date of birth, worker ID</p>	<p>To verify your identity, negotiate and enter into a contract with you or authorise you to perform work at ASL Group.</p>

Type of Personal Information	Why does ASL Group use this information?
<b>Contact details:</b> such as home and business address, telephone/email addresses, emergency contact details	To verify your identity, negotiate and enter into a contract with you or authorise you to perform work at ASL Group.
<b>Employment details:</b> such as job title/position, office location, employment contract, training information, performance and disciplinary records, grievance procedures, hours of work, sickness/holiday records, details of termination or resignation of employment	To carry out ASL Group's contract with you, monitor your compliance with ASL Group policies, provide you with training and benefits and provide remuneration.
<b>Background information:</b> such as academic/professional qualifications, education, CV/resume, language skills, details of spouses and dependents, references, previous employer details, membership of professional or trade association or trade union	To undertake adequate due diligence, to enter into and perform a contract with you, to carry out education and training programs, to carry out planning and forecasting activities and to authorise you to perform work at ASL Group.
<b>Employment Equity information:</b> such as race, gender or disabilities	To comply with statutory reporting obligations under the <i>Employment Equity Act, 1998</i> .
<b>National identifiers:</b> such as national ID/passport, birth certificate, immigration/visa status	To undertake adequate due diligence, to enter into and perform a contract with you, to carry out education and training programs, to carry out planning and forecasting activities and to authorise you to perform work at ASL Group.
<b>Financial information:</b> such as banking details, tax information, withholdings, salary, benefits, expenses, company allowances, stock and equity grants	To carry out ASL Group's contract with you and provide you with benefits and remuneration.

Type of Personal Information	Why does ASL Group use this information?
<p><b>IT information:</b> information required to provide access to company IT systems and networks such as IP addresses, log files and login information</p>	<p>To carry out ASL Group's contract with you and to monitor your compliance with ASL Group's policies.</p>
<p><b>Other information relating to your employment:</b> such as, criminal background checks; data relating to equal opportunities monitoring; health and workers compensation claims; health monitoring results and records; communications with you (including notes from meetings and telephone calls); feedback or survey responses you provide to ASL Group; results of drug and alcohol testing; psychometric evaluation records conducted by a health professional registered by the Health Professions Council of South Africa (HPCSA).</p>	<p>To comply with ASL Group's legal and regulatory obligations and to carry out ASL Group's contract of employment with you or to authorise you to perform work at ASL Group.</p>
<p><b>Job applicants</b></p>	
<p><b>Contact information:</b> such as, name; email; telephone number; address.</p>	<p>To verify your identity, enter into and perform an employment contract with you and respond to queries and requests.</p>
<p><b>Education and qualification information:</b> such as, previous employer; education details; referees; professional memberships; affiliations; third party references.</p>	<p>To assess your suitability for the job applied for and to enter into and perform an employment contract with you.</p>
<p><b>Other information relating to potential employment:</b> such as, criminal background checks; information collected from pre-clearances</p>	<p>To comply with ASL Group's legal and regulatory obligations and to carry out ASL Group's contract of employment with you.</p>

Type of Personal Information	Why does ASL Group use this information?
<p>questionnaires and/or interviews; passports and visas; equal opportunities monitoring; health information; psychometric evaluation records conducted by a health professional registered by the Health Professions Council of South Africa (HPCSA).</p>	
<p><b>Third parties with whom ASL Group has a business relationship, such as, contractors and service providers</b></p>	
<p><b>Contact information:</b> such as, name; email; telephone number; company name, business address, business phone</p>	<p>To enter into a business relationship with the third party. To keep you informed about ASL Group's activities and updates, to respond to any queries and requests, to manage and resolve any commercial or legal complaints or issues, to carry out planning and forecasting activities and other business processes.</p>
<p><b>Third party personnel:</b> such as, name, role/position; citizenship/nationality; national identity numbers; type and percentage of ownership.</p>	<p>To carry out due diligence prior to entering into a relationship with the third party and/or to decide whether to continue a business relationship with the third party.</p>
<p><b>Financial and compliance due diligence information on relevant personnel:</b> such as, criminal conviction data including investigations, allegations or prosecutions relating to financial or other serious misconduct.</p>	<p>To undertake adequate financial and compliance due diligence to comply with regulatory requirements to assess any financial and compliance misconduct.</p>
<p><b>Customers and other users of ASL Group's services</b></p>	
<p><b>Contact information:</b> such as, name; email; telephone number; address (this</p>	<p>To enable ASL Group to provide ASL Group's services to you, to keep you informed about ASL Group's activities and updates, to respond to any queries and requests, to carry out market</p>

Type of Personal Information	Why does ASL Group use this information?
specifically includes information about the company that you represent).	analysis and research, to manage and resolve any commercial or legal complaints or issues.
<b>Technical information:</b> such as device type; unique device identification numbers; browser type; broad geographical location.	To monitor the use of ASL Group's services and to assess, maintain, upgrade and improve ASL Group's services, to carry out market analysis and research, to carry out planning and forecasting activities and for other internal business processes.
<b>Industry information and interests:</b> such as the type of business your company is and the environment within which it conducts business, the number of years your company has been in operation for, the types of services you are enquiring about or interested in.	To enable ASL Group to put you in contact with the appropriate person to provide services to you; to monitor the categories of company interested in ASL Group's services and the interest in ASL Group's different service offerings.

- 3.4. The above list is not exhaustive. ASL Group may collect other Personal Information from time to time where you provide it to ASL Group, as necessary for its business requirements, or in order to comply with applicable laws. It will be made clear to you at the point of collection the type of data ASL Group requires and the reasons for collecting it.
- 3.5. Please note that other third-party websites and social media may be accessible via hyperlinks from the ASL Group website. These websites are owned and operated by third parties. ASL Group has no control over the content of those other websites and social media platforms, and these websites will not be subject to ASL Group's Privacy Policy. ASL Group encourages you to review the separate privacy policies for these websites and platforms before using them to understand how the third parties collect, manage and use your Personal Information. ASL Group cannot be responsible for your use of such third-party websites and features.
- 3.6. **Special Personal Information**

Under POPIA, certain categories of Personal Information are defined as "Special Personal Information" and POPIA requires additional safeguards to be implemented. Special Personal Information includes information about racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, trade-union membership, health or medical conditions, genetic or biometric information, sexual orientation, or criminal convictions and offences. ASL Group will only collect, manage and use your Special Personal Information where ASL Group has obtained your explicit consent or where ASL Group has other lawful grounds to do so under applicable law.

## 4. COOKIES NOTICE

### 4.1. What are cookies?

4.1.1. Cookies are small data files that are placed on your computer or mobile device when you visit a website to track the number of visitors to ASL Group's website, collect information, where available, about your computer or mobile device for system administration purposes, to evaluate the ASL Group website's effectiveness and improve your experience.

4.1.2. Cookies set by the website owner (in this case, ASL Group) are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". ASL Group does not use any third-party cookies.

### 4.2. Why does ASL Group use cookies?

ASL Group uses first party cookies for several reasons. Some cookies are required for technical reasons in order for the ASL Group website to operate; ASL Group refers to these as "essential" or "strictly necessary" cookies. Other cookies also enable ASL Group to track and target the interests of ASL Group users to enhance the experience on the ASL Group websites. This information is used anonymously and in aggregate and is collected and logged for statistical purposes. Cookies are not used by ASL Group to identify who you are or to send you advertising.

### 4.3. How can I control cookies?

You have the right to decide whether to accept or reject cookies. You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject



cookies, you may still use the ASL Group website, although your access to some functionality and certain areas of the ASL Group website may be restricted. As a result of the way in which you can refuse cookies through your web browser controls varies from browser-to-browser, you should visit your browser's help menu for more information.

## 5. HOW DOES ASL GROUP STORE PERSONAL INFORMATION?

5.1. ASL Group may hold your Personal Information in electronic or in hard copy form. ASL Group may keep this information at ASL Group's own premises, or at sites managed by ASL Group service providers.

5.2. ASL Group is committed to keeping your Personal Information safe, confidential and secure. ASL Group uses a range of physical, electronic and procedural safeguards to do this. ASL Group updates these safeguards from time to time in order to address new and emerging security threats. ASL Group also trains employees on privacy matters as appropriate and seeks to limit access to Personal Information to those employees who need to know that information.

### 5.3. Retention of Personal Information

5.3.1. ASL Group retains Personal Information ASL Group collects from you where it has an ongoing legitimate business need to do so (for example, to provide you with a product or service you have requested, or to comply with applicable auditing, legal, tax or accounting requirements).

5.3.2. ASL Group's aim is to keep your Personal Information for no longer than is necessary for compliance or other legitimate business purposes. ASL Group applies its standard document retention and disposal procedures and processes to records that include Personal Information. These procedures and processes take account of document retention requirements imposed by law on ASL Group. For more information on ASL Group's document retention practices please contact ASL Group using the details below contained in this Policy.

## 6. HOW DOES ASL GROUP DISCLOSE PERSONAL INFORMATION

6.1. In appropriate circumstances, ASL Group may disclose your Personal Information to the following categories of third parties:

- members of ASLs Group;
- ASL Group's business partners and their agents;
- auditors, legal and other professional advisers and share registries;
- IT and other service providers;
- government and law enforcement authorities;
- financial institutions;
- HR practitioners, hiring managers and recruitment advisors;
- other third parties where disclosure is required by law; and
- to any other person with your consent to the disclosure.

6.2. ASL Group takes reasonable steps to protect the confidentiality and security of your Personal Information when it is disclosed to a third-party and seeks to ensure that your information is dealt with in accordance with ASL Group's instructions, POPIA and other applicable laws, and only for the purpose for which it is disclosed.

## 7. **WILL MY PERSON INFORMATION BE DISCLOSED OR TRANSFERRED OVERSEAS?**

- 7.1. In some cases, the third parties to whom ASL Group may disclose your Personal Information may be located outside your country of residence (for example, in a cloud service, system or server), and may be subject to different privacy regimes.
- 7.2. Where required by applicable law, when ASL Group discloses Personal Information overseas, it will ensure appropriate safeguards are in place to require that your Personal Information will remain protected and that the recipient will handle the information in a manner consistent with this Policy and POPIA.

## 8. **WHAT RIGHTS TO I HAVE AND HOW CAN I EXERCISE THEM?**

You can request:

- 8.1. confirmation on whether the ASL Group holds Personal Information about you;
- 8.2. access to your Personal Information held by ASL Group; or

- 8.3. that Personal Information be updated or corrected.
- 8.4. You can exercise these rights at any time by contacting the ASL Group and following the procedure set out in the ASL Group Promotion of Access to Information Manual.

9. **WHO CAN I CONTACT IF I HAVE A QUESTION OR COMPLAINT?**

9.1. If you have a question, concern or complaint regarding the way in which ASL Group handles your Personal Information, or if you believe that ASL Group has failed to comply with this Policy or breached any applicable laws in relation to the management of that information, you can make a complaint.

9.2. Any question, concern or complaint should be made in writing to:

by email: [christas@asl.co.za](mailto:christas@asl.co.za)

or

by mail: Trident Park 1  
1 Niblick Way  
Somerset West  
7130

9.3. ASL Group will review and respond to your question, concern or complaint as soon as possible, generally within 30 days<sup>1</sup> of receiving it.

9.4. If you are not satisfied with our response, you can refer your complaint to the Information Regulator using the contact details listed below:

9.4.1. Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

9.4.2. Tel: 012 406 4818

9.4.3. Fax: 086 500 3351

9.4.4. Email: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)

## 10. **POLICY REVIEW AND UPDATES**

ASL Group will review this Policy periodically and update it from time to time, or when relevant regulatory changes occur. Please visit the ASL Group website at [www.asl.co.za](http://www.asl.co.za) to obtain a copy of the latest version at any time.