

Montana Forum
Tecomariastraat 20, Montana 0186
Posbus 906 453, Magalieskruin, 0150
Tel: 012 548 6460
Faks: 012 548 4130
Reg. No. 2003/011603/07
www.lubbestrust.co.za



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20 Tecomaria Street, Montana 0186
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Fax: 012 548 4130
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Lubbes Trust (Pty) Ltd Privacy Notice

Introduction:

This Notice explains how we obtain, use, and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”). Lubbes Trust (Pty) Ltd (and including this website, www.lubbestrust.co.za) are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully, and transparently.

Who we are:

Lubbes Trust (Pty) Ltd specialises in the administration of deceased estates, trusts, wills and various other fiduciary services.

The type of personal information we collect:

We collect, the following information, including, but not limited to:

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
- d) the access control information of the person;
- e) the personal opinions, views or preferences of the person;

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- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements and delivering services accordingly.

We collect information directly from you where you provide us with your personal details or from a third person in the event of trust and deceased estate administration. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

How we get the personal information and what we use it for:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or user experience optimisation purposes, enabling us to provide you with an enhanced service delivering experience at Lubbes Trust (Pty) Ltd.

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

We may collect or obtain personal information about you:

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- (a) directly from you;
- (b) during the course of our interactions with you;
- (c) when you visit and/or interact with our website or any other social media platforms or IT services;
- (d) from a third party who is authorized to share that information;
- (e) via a mobile or other software app developed for Lubbes Trust (Pty) Ltd.

We also receive personal information indirectly, from the following sources in the following scenarios:

- Various financial institutions, brokers, creditors, debtors, state institutions, family, friends and spouse for the purpose to administrate trusts and deceased estates.

We use the information that you have given us in order to:

- Effectively and accurately administrate trusts and deceased estates.

We may share this information with:

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

Collection of Information by “Cookies”

You are aware that information and data is automatically collected through the standard operation of the Internet servers and by the use of "cookies." "Cookies" are small text files a website can use to recognise repeat users, facilitate the user's ongoing access to and use of the Website and allow a Website to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. Cookies are not programs that come onto your system and damage files. Generally, cookies work by assigning a unique number to you that has no meaning outside the assigning site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows

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you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you with certain features (e.g., customized delivery of information) available on our Websites.

When will we process your personal information:

In terms of the Protection of Personal Information Act (POPIA), the justification ground which we base our processing on consist out of the following:

- The data subject or a competent person where the data subject is a child **consents** to the processing. Kindly note that you have the right to withdraw your consent;
- The processing is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party;
- The processing complies with an **obligation** imposed by law on the business;
- The processing protects a **legitimate** interest of the data subject;
- The processing is necessary for the proper performance of a **public law** duty by the business;

Or

- The processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

How we store your personal information:

Your information is securely stored:

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;

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- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We keep your information for as per our Data Retention Policy. We will then dispose your information by as per our Data Destruction Policy.

International Transfer of Personal Information

In some cases, the third parties to whom we 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.

When we disclose personal information overseas, we will take appropriate safeguards to protect your personal information to ensure that the recipient will handle the information in a manner consistent with this policy and the level of protection provided for in POPIA.

Your data protection rights:

- You are entitled to access your personal data by sending a written request to Alwyn van Zyl – alwyn@lubbestrust.co.za. We may charge you a fee for this service as set out in terms of Condition 8 of POPIA.
- You may also request Lubbes Trust (Pty) Ltd to correct or supplement any of your personal data which Lubbes Trust (Pty) Ltd will undertake as soon as practicable.
- Request the destruction of your personal data. Jaco Burmeister jaco@lubbestrust.co.za will consider your request in light of any other laws or regulations prohibiting Lubbes Trust (Pty) Ltd from destroying your personal data.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at alwyn@lubbestrust.co.za if u wish to make a request.

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Contact details:

Name: Alwyn van Zyl
Address: Montana Forum, 20 Tecomaria Street, Montana, Pretoria, 0182
Phone Number: 012 548 6460
E-mail: alwyn@lubbestrust.co.za / jaco@lubbestrust.co.za

How to complain: deputy

If you have any concerns about our use of your personal information, you can make a complaint to us at alwyn@lubbestrust.co.za.

You can also complain to the Information Regulator if you are unhappy with how we have used your Information.

Their contact details are as follows:

The Information Regulator (South Africa)
33 Hoofd Street
Forum III, 3rd Floor Braampark
P.O Box 31533
Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za