

CLIENT PRIVACY NOTICE

Baker Tilly Morrison Murray and Baker Tilly Morrison Murray Consulting CC (“Baker Tilly Morrison Murray”) recognises that one of its fundamental responsibilities is to ensure that it protects Personal Information entrusted to it by its clients.

This is critical for the maintenance of Baker Tilly Morrison Murray’s reputation and for complying with its legal and regulatory obligations to protect the Baker Tilly Morrison Murray’s client Information. Baker Tilly Morrison Murray also follows a transparent Policy to handle Personal Information of its clients.

In this Policy, Personal Information means any Information that relates to a natural person, which either directly or indirectly, in combination with other Information available or likely to be available with Baker Tilly Morrison Murray, is capable of identifying such person (e.g., telephone number, name, address, transaction history etc.).

This Policy is in compliance with the Protection of Personal Information Act, Act 4 of 2013.

APPLICABILITY

Baker Tilly Morrison Murray collects three types of Information: Personal Information, Sensitive Personal Information and Non-personal Information.

Personal Information means any Information that relates to a natural person, which either directly or indirectly, in combination with other Information available or likely to be available with Baker Tilly Morrison Murray, is capable of identifying such person, for e.g., telephone number, name, address, transaction history etcetera.

Sensitive Personal Information or Information of a person means such Personal Information which consists of Information relating to passwords, financial Information such as bank account or credit card or debit card or other payment instrument details, sexual orientation, physical physiological and mental health condition, medical records and history, biometric Information, details of nominees and national identifiers including but not limited to: account number, bank card details, passport number, income, etc. For clients enrolled in services provided by Baker Tilly Morrison Murray, such as online bill payment, Personal Information about the transaction is collected.

Any Information that is freely available or accessible in public domain or furnished under the PAIA or any other law for the time being in force shall not be regarded as sensitive Personal Information or Information for the purpose of this Policy.

The Information clients provide online is held by Baker Tilly Morrison Murray’s business that maintains the account or is processing the application for a new product or service.

Non-Personal Information includes the IP address of the device used to connect to Baker Tilly Morrison Murray’s website along with other Information such as browser details, operating system used, the name of the website that redirected the visitor to Baker Tilly Morrison Murray’s website, etc. Also, when you browse our site or receive one of our e-mails, Baker Tilly Morrison Murray uses cookies and/or pixel tags to collect Information and store your online preferences.

This Policy is applicable to Personal Information (including sensitive Personal Information) collected by Baker Tilly Morrison Murray directly from the client or through Baker Tilly Morrison Murray’s online portals, electronic communications as also any Information collected by Baker Tilly Morrison Murray’s server from the client’s browser.

ACCURACY

Baker Tilly Morrison Murray shall have processes in place to ensure that the Personal Information residing with it is complete, accurate and current. If at any point of time, there is a reason to believe that Personal Information residing with Baker Tilly Morrison Murray is incorrect, the client should inform Baker Tilly Morrison Murray in this regard. Baker Tilly Morrison Murray shall correct the erroneous Information as quickly as possible.

PURPOSE OF COLLECTION AND USAGE OF PERSONAL INFORMATION

Baker Tilly Morrison Murray shall use the Information collected to provide services to our clients and offer an enhanced, personalised experience. Further, it shall enable Baker Tilly Morrison Murray to:

- Process applications, requests and transactions
- Maintain internal records as per regulatory guidelines
- Provide services to clients, including responding to client requests
- Comply with all applicable laws and regulations
- Recognise the client when he conducts online banking
- Understand the needs and provide relevant product and service offers

If a client does not wish to provide consent for usage of its sensitive Personal Information or Information or later withdraws the consent, Baker Tilly Morrison Murray shall have the right not to provide services or to withdraw the services for which the Information was sought from the client.

DISCLOSURE / SHARING OF INFORMATION

Baker Tilly Morrison Murray shall not disclose Personal Information of its clients without their prior consent unless such disclosure has been agreed to in a contract between Baker Tilly Morrison Murray and the client, or where the disclosure is necessary for compliance of a legal obligation. In case Baker Tilly Morrison Murray discloses the Personal Information to Third Parties, such Third Parties shall be bound contractually to ensure that they protect client Personal Information in accordance with applicable laws.

The above obligations relating to sharing of Personal Information or Information shall not apply to Information shared with government mandated under the law to obtain such Information or by an order under law for the time being in force. Further, if any Personal Information or Information is freely available or accessible in the public domain, Baker Tilly Morrison Murray shall not have any obligations regarding the same.

No specific Information about client accounts or other personally identifiable Personal Information shall be shared with non-affiliated Third Parties unless any of the following conditions is met:

- To help complete a transaction initiated by the client;
- To perform support services through an outsourced business provided it conforms to the Privacy Policy of Baker Tilly Morrison Murray;
- The client has specifically authorised it;
- To conform to legal requirements or comply with legal process;
- The Information is shared with Government agencies mandated under law;
- The Information is shared with any Third Party by an order under the law;
- Enforce the terms and conditions of the products or services;
- Act to protect the rights, interests or property of Baker Tilly Morrison Murray or its members or of other persons.

SECURITY PRACTICES

The security of Personal Information is a priority and shall be ensured by maintaining physical, electronic, and procedural safeguards that meet applicable laws to protect client Information against loss, misuse, damage and unauthorised access, modifications or disclosures. Employees shall be trained in the proper handling of Personal Information. When other businesses are used to provide services on behalf of Baker Tilly Morrison Murray, it shall ensure that such businesses protect the confidentiality of Personal Information they receive in the same manner Baker Tilly Morrison Murray protects. Baker Tilly Morrison Murray shall continuously review and enhance its Security Policies and security measures to consistently maintain a high level of security.

AMENDMENTS

Baker Tilly Morrison Murray shall reserve the right to change or update this Policy or Practice, at any time with reasonable notice to clients on Baker Tilly Morrison Murray's website so that clients are always aware of the Information which is collected, for what purpose Baker Tilly Morrison Murray uses it, and under what circumstances, if any, Baker Tilly Morrison Murray may disclose it.

By virtue of this Privacy Policy, the client assents to collection, use, transfer, disclosure, retention and other processing of her/his Personal Information, including sensitive Personal Information, as described in this Policy.

RESPONSE TO ENQUIRIES AND COMPLAINTS

Baker Tilly Morrison Murray shall encourage client enquiries, feedback and complaints which shall help it identify and improve the services provided to the clients.

PURPOSE SPECIFICATION OF PERSONAL INFORMATION

Any Personal Information supplied by a Data Subject shall only be collected and used by Baker Tilly Morrison Murray for the purpose for which it was originally intended. In the event that the Personal Information will be used for another purpose, consent from the Data Subject will be obtained prior to the use of such Information.

ACCURACY OF PERSONAL INFORMATION

In the event of any changes to the Personal Information of a Client, the said Client is under an obligation to inform Baker Tilly Morrison Murray of the said changes within a reasonable period of time.

CHANGES IN THIS POLICY

Baker Tilly Morrison Murray reserves the right to amend, alter and terminate this Policy at any time.

DEPUTY INFORMATION OFFICER DETAILS

Contact Person : Malie Dand
Telephone no : 031 2675300 ext 1149
Email : popi@bakertillymm.co.za

INFORMATION OFFICER DETAILS

Name : Jason Howitz
Telephone no : 031 2675300 ext 1005
Email : popi@bakertillymm.co.za

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Authorised by :

Jason Howitz
Information Officer