



 082 820 6428

 044 333 0127

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9 Mitchell Street | Mossel Bay  
PO BOX 713 6500

## REVIEW

# Protection of Personal Information DATA PRIVACY POLICY

FEBRUARY 2023

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## 1. DEFINITIONS

- 1.1** **“FICA”**: means the Financial Intelligence Centre Act 38 of 2001 (also known as “FICA”), as amended together with any Regulations thereto.
- 1.2** **“Financial Intelligence Centre or FIC”**: means the Financial Intelligence Centre which is South Africa’s national centre for gathering, analysis and dissemination of financial intelligence. It was established to identify proceeds of crime, combat money laundering and the financing of terrorism and, in so doing, has a primary role to protect the integrity of South Africa’s financial system.
- 1.3** **“Information officer”**: of THE FIRM will mean SHARLENE DELECIA MEYER;
- 1.4** **“Personal information”**: means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: Information relating to the education or the medical, financial, criminal or employment history of the person; Any identifying number, symbol, e-mail address, telephone number, location information, online identifier or other particular assignment to the person; The biometric information of the person; The personal opinions, views or preferences of the person; Correspondence sent by the person that would reveal the contents of the original correspondence if the message is of a personal or confidential nature; The views or opinions of another individual about the person; and 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;
- 1.5** **“THE FIRM”**: for purposes of this Policy document means the law firm registered as FIONA WILLIAMSON ATTORNEYS, a limited personal liability company registered with the Companies and Intellectual Property Commission (CIPC) under registration number 2018/394972/21, situated at 9 Mitchell Street, MOSSELL BAY, 6500.

## 2. INTRODUCTION

- 2.1** THE FIRM implemented its POPIA Data Protection Policy in during the course of June 2022 and this REVIEW is intended to enhance the 2022 provisions and data protection measures. In compliance of the POPIA requirement to have data protection measures reviewed annually, THE FIRM has enhanced its own processes and wishes to record these enhancements herein.
- 2.2** This REVIEW must be read together with the June 2022 POPIA Policy and all definitions, other than the ones herein contained, will apply equally to the June 2022 POPIA Policy and this document.



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**2.3** THE FIRM still operates in the property conveyancing industry through which it deals with:

- 2.3.1** The South African banks as far as THE FIRM is appointed on its bond cancellation and bond registration panels as well as the receipt and payment of funds via its own accounts into client accounts and accounts of other parties involved in the transactional cycle;
- 2.3.2** Other attorneys linked to THE FIRM's transactions;
- 2.3.3** The relevant Municipal Authorities in which properties are situated;
- 2.3.4** The South African Revenue Services;
- 2.3.5** Managing Agents and Body Corporates in Sectional Title Complexes and Gated Security Estates;
- 2.3.6** Sellers and buyers of property, owners of property in which bonds are cancelled and buyers whose bonds are registered;
- 2.3.7** The software service suppliers whose digital products support THE FIRM in its operations;
- 2.3.8** The IT support service suppliers who support THE FIRM with cyber tools and products;
- 2.3.9** The Deeds Registry.

**2.4** The way in which THE FIRM communicates with the various role players in its transactions has now been addressed particularly as a result of recent hacking attacks on law firms in particular. THE FIRM does however acknowledge that most of its communications are still done electronically via email and other electronic methods but has engaged with service suppliers to secure these electronic communications.

### 3. OBJECTIVE OF THIS REVIEW

Although THE FIRM and its employees accept that it is not possible to ensure 100% mitigation against data breaches, the objective of this REVIEW is to ensure that the measures implemented by THE FIRM since the June 2021 POPIA Policy are recorded and that employees are held responsible for compliance therewith.

### 4. CONTINUED ADHERENCE WITH THE POPIA CORE PRINCIPLES

In its attempt to mitigate the risks associated with the data it collects and processes, THE FIRM has positively addressed the areas of operation which could impact on its data subjects rights in the following ways:

- 4.1.** THE FIRM has, since June 2022, continued to develop and maintain reasonable protective measures against the possibility of data risks and now use dedicated software to ensure encryption and protection of communications, employed the services of various IT security service providers to secure devices and files;



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- 4.2. THE FIRM has also, since June 2022, implemented further internal and external processes when collecting and sharing personal information, when storing the information and sharing the information;
  - 4.3. In compliance with sections 8, 17 and 18 of POPIA, THE FIRM confirms that it adheres to an approach of transparency of operational procedures that controls collection and processing of personal information and subscribes to a process of accountability and openness throughout its operations;
  - 4.4. In compliance with sections 9, 10, 11, 12, 13 14 and 15 of POPIA, THE FIRM collects personal information only for the purposes of delivering its legal services and makes clear declarations on its Consent forms in respect thereof;
  - 4.5. THE FIRM continuously addresses its employees to ensure that personal information is not collected, disseminated, shared and stored in an insensitive, derogative discriminatory or wrongful way that can intrude on the privacy of the particular data subject and any transgression which may occur is addressed by management of THE FIRM;
  - 4.6. In compliance of sections 23 to 25 of POPIA, THE FIRM clearly indicates to data subjects the availability of their information and the data subjects' rights to request deletion or correction of the information;
  - 4.7. THE FIRM strictly adheres to the policy of not requesting or processing information related to race, religion, medical situation, political preference, trade union membership, sexual certitude or criminal record unless this is lawfully required in order for THE FIRM to deliver the legal services it is mandated to perform and unless the data subject has expressly consented. THE FIRM will also not process information of children unless the specific consent provisions contained within POPIA have been complied with;
  - 4.8. THE FIRM has implemented its own OPERATOR'S AGREEMENT which is presented to third party service suppliers which process or store data subject information on behalf of THE FIRM and data subjects' Consent is requested in order to share necessary information to such third parties when necessary for THE FIRM to deliver its services and/or comply with Regulatory Compliance requirements;
  - 4.9. Most importantly, THE FIRM has been committed to comply with the provisions of sections 19 to 22 of POPIA and has implemented many new measures to continue to secure the integrity and confidentiality of personal information in its possession.



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## 5. CONSENT

- 5.1 THE FIRM continues to obtain its data subjects' express Consent to it collecting, processing, sharing and storing information in it delivering its legal services.
- 5.2 If personal information is used for any other reason than the original reason of it being collected, the specific Consent for this is obtained from the data subject.
- 5.3 In the exception that THE FIRM requires SPECIAL PERSONAL INFORMATION from its data subjects, it is collected, processed and stored only if a specific Consent for such collection is obtained unless:
  - 5.3.1 Processing is necessary for the establishment, exercise or defense of a right or obligation in law;
  - 5.3.2 Processing is for historical, statistical or research purposes.

## 6. THE FIRM'S ENHANCED APPROACH TO THE COLLECTION, PROCESSING AND SHARING OF INFORMATION

- 6.1 The primary way of collection and processing of personal information is electronically. Data subjects' information is collected either directly from the data subject or from public databases available to THE FIRM.
- 6.2 As a result of the increased FICA Regulatory obligations on THE FIRM to assess the money laundering and terrorist financing risks associated with its transactions, THE FIRM has implemented its FICA RISK MANAGEMENT AND COMPLIANCE PROGRAMME, in terms of which:
  - 6.2.1 THE FIRM is under obligation to identify the data subject, the source of funds in its transactions, the details in respect of data subjects' occupations, details of countries in which the data subjects do business and whether a data subject is politically exposed or not;
  - 6.2.2 THE FIRM is also required to screen every transactional party against the TFS/UN1267 lists published on the FIC website;
  - 6.2.3 THE FIRM must also investigate the transactional parties' social media accounts and verify that no adverse information appears on any news channels or Google.
- 6.3 Many data subjects assume that the POPIA rights obfuscate their obligations on the part of THE FIRM to comply with the FICA requirements. The FIC Act is complementary to the provisions of POPIA which lists the grounds



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of justification for processing personal information. POPIA specifically states that personal information may be processed if this will comply with the requirements imposed by law on the responsible party.

- 6.4 FICA, therefore, provides the necessary justification that enables accountable institutions to process personal information under POPIA, provided they do so within the scope of the obligations imposed by FICA.
- 6.5 By submitting personal and special personal information details to THE FIRM, all data subjects acknowledge the following:
- 6.5.1 That Personal information collected by THE FIRM will be collected directly from the data subject, unless;
  - 6.5.2 The information is contained or derived from a public record or has deliberately been made public by the data subject;
  - 6.5.3 Collection of the information from another source would not prejudice a legitimate interest of the data subject;
  - 6.5.4 Collection of the information from another source is necessary–
    - 6.5.4.1 To avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution and punishment of offences;
    - 6.5.4.2 To comply with an obligation imposed by law or to enforce legislation concerning the collection of revenue;
    - 6.5.4.3 For the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated;
    - 6.5.4.4 In the interest of national security;
    - 6.5.4.5 To maintain the legitimate interests of THE FIRM or of a third party to whom the information is supplied;
    - 6.5.4.6 Compliance would prejudice a lawful purpose of the collection;
    - 6.5.4.7 Compliance is not reasonably practicable in the circumstances of the particular case.
- 6.6 When personal and special personal information is collected, processed and shared on behalf of the banks for the purposes of THE FIRM registering a mortgage bond or delivering other services on behalf of the bank/s, THE FIRM will ensure that only the required information is collected, processed and shared as required by the bank/s.



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- 6.7 THE FIRM continues to offer a full explanation of the nature of the information being collected, processed and shared in terms of a banking instruction clearly with the affected data subject and obtains the Consent of such data subject where necessary.

## 7. STORAGE OF INFORMATION

- 7.1 THE FIRM acknowledges the risks facing data subjects with the storage of personal and special personal information on THE FIRM's software systems now more than ever as law firms are a particular target for cyber attacks due to the large amounts of monies which change hands in property transactions.

- 7.2 THE FIRM uses the following software systems in its operations:

### 7.2.1 LEXIS NEXIS:

- 7.2.1.1 KYC for FICA identification, screening and verification and information shared with LEXIS NEXIS KYC is stored in the LEXIS NEXIS servers;
- 7.2.1.2 LEXPRO for the accounting in transactions and information loaded onto LEXPRO is stored in the LEXIS NEXIS servers;
- 7.2.1.3 LEXPRO PAYROLL for the administration of THE FIRM's payroll requirements and information loaded onto LEXPRO PAYROLL is stored on the LEXIS NEXIS servers;
- 7.2.1.4 LEXIS CONVEY for the administration of THE FIRM's conveyancing transactions (including bond cancellations, bond registrations and property transfers) and information shared with LEXIS CONVEY is stored on the servers of LEXIS NEXIS;
- 7.2.1.5 SECURECHAT for the safe and encrypted sharing and receiving of banking details and other data subjects' information and with the information shared with SECURECHAT held on the servers of LEXIS NEXIS.

- 7.2.2 HETZNER which hosts THE FIRM's email servers.

- 7.3 THE FIRM's physical files are archived in the offices in Mosselbay.

## 8. AMENDMENT OR DISPOSAL OF DATA SUBJECTS' INFORMATION



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- 8.1 THE FIRM directs its data subjects to the physical request forms attached as Annexures 1 and 2 to the June 2022 POPIA Policy should a data subject wish to request amendment or deletion of personal information on all systems which support the operations of THE FIRM.

## 9. INTERNET AND CYBER TECHNOLOGY

- 9.1 THE FIRM has, since June 2022 with the implementation of its POPIA Policy, addressed certain cyber risks to which its business is exposed in furtherance of its quest to protect itself and its data subjects against cyber attacks, phishing emails and hijackings.
- 9.2 Together with this REVIEW, THE FIRM has enhanced its internal IT/EMAL/Cyber Security Policy which enhancement has been circulated to all employees.

## 10. THE FIRM'S ANTI-VIRUS MEASURES REVIEWED

- 10.1 THE FIRM'S IT service provider isVTS Connect Pty Ltd t/a VTS Communications who has implemented the following measures to support THE FIRM in its continued quest to minimize the email interception, hacking and other cyber risks:
- 10.1.1 THE FIRM has Watchguard Firebox T15 in place to protect its internal LAN from viruses and Bot Attacks;
  - 10.1.2 THE FIRM has the following active services on the device that gets automatically updated via the internet:
    - 10.1.2.1 Gateway Antivirus;
    - 10.1.2.2 Intrusion Prevention;
    - 10.1.2.3 Service WebBlocker;
    - 10.1.2.4 File Exceptions;
    - 10.1.2.5 SpamBlocker;
    - 10.1.2.6 Botnet Detection;
    - 10.1.2.7 Application Control;
    - 10.1.2.8 Geolocation protection.
  - 10.1.3 As previously mentioned, THE FIRM'S emails are hosted at Hetzner with a level 5 spam filter is applicable to all incoming emails.



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### 10.2 Employee email responsibilities

10.2.1 In order to ensure that THE FIRM's IT systems are not misused, everyone who uses or has access to THE FIRM's systems have received training and internal guidelines in order to meet the following five high-level IT Security requirements:

10.2.1.1 Information will be protected against any unauthorized access as far as possible by ensuring that SECURECHAT is used for especially the sending and receiving of banking details and copies of other personal information;

10.2.1.2 Confidentiality of information will be assured as far as possible by ensuring that only the relevant data subject is included in emails pertaining to the particular matter;

10.2.1.3 Integrity of information will be preserved as far as possible;

10.2.1.4 Availability of information for business processes will be maintained;

10.2.1.5 Compliance with applicable laws and regulations to which THE FIRM is subject and reference here is made to the FICA requirements, the FIC Act and POPIA.

10.2.2 Every user of THE FIRM's IT systems takes responsible for exercising good judgment regarding reasonable personal use.

## 11. UPDATED THIRD PARTY OPERATORS' AGREEMENTS

11.1 In most transactions, THE FIRM shares data subjects' personal and special personal information with third parties for purposes of delivering its services and complying in particular with the FIC Act. Where necessary, THE FIRM will obtain the necessary Consent from the particular data subject.

11.2 THE FIRM shall continue to present its OPERATOR'S AGREEMENT to third party services suppliers who manage data subjects' information on behalf of THE FIRM. This is necessary in order to bind such third party service suppliers to POPIA and such service suppliers own duty to ensure that it complies with POPIA.

## 12. BANKING DETAILS

12.1 In addition to THE FIRM having implemented clear warnings within all its correspondences (emails and physical letters) warning data subjects of the risks of email hacking and interceptions, THE FIRM has contracted with



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LEXIS NEXIS SECURECHAT specifically for the purposes of sending banking details, receiving banking details or communicating other confidential information with or to its data subjects.

- 12.2 Employee awareness is still key in avoiding banking details being intercepted and employees are required to speak to their data subjects telephonically throughout the course of the transaction to ensure that bank details have not been compromised.

### 13. INFORMATION OFFICER

- 13.1 **Appointed Information Officer: SHARLENE DELECIA MEYER, NUMBER: 044 333 0127, EMAIL: [sharlene@fwlaw.co.za](mailto:sharlene@fwlaw.co.za);**

- 13.2 SHARLENE DELECIA MEYER will continue to serve as THE FIRM's primary contact when meeting with law enforcement agencies. In such meeting, SHARLENE may include any of THE FIRM's paralegals who assist her in the compliance functions or any of the attorneys whose files are in question. It is further recorded that SHARLENE will attend ongoing POPIA, Cyber Security and general POPIA training in order to ensure that he is sufficiently upskilled and able to efficiently ensure that all representatives of THE FIRM follow proper POPIA guidelines set out herein and that he remains equipped with the necessary skills in order to ensure continued review of THE FIRMS' Data Privacy rules and Cyber Security practices.

- 13.3 **The general responsibilities of THE FIRM's Information Officer continue to be the following:**

- 13.3.1 The encouragement of compliance, by THE FIRM, with the conditions for the lawful processing of personal information.
- 13.3.2 The management of requests made to THE FIRM pursuant to POPIA.
- 13.3.3 Working with the Regulator in relation to investigations conducted pursuant to prior authorisation required to process certain information of POPIA in relation to the business.
- 13.3.4 Continuously perform data backups, store at least weekly backup offsite, and test those backups regularly for data integrity and reliability.
- 13.3.5 Arranging the further annual review of the rules and of this REVIEW DOCUMENT, document the results, and update the policy as needed.
- 13.3.6 Continuously update information security policies and network diagrams.
- 13.3.7 Secure critical applications and data by patching known vulnerabilities with the latest fixes or software updates.
- 13.3.8 Perform continuous computer vulnerability assessments and audits.



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- 13.3.9** The Information Officer may appoint any number of Deputy Information Officers as is necessary to perform the duties of the Information Officer as set out above. The Information Officer has control over every Deputy Information Officer(s) appointed.
- 13.4 The Information Officer may delegate, in writing, his/her power of duty conferred or imposed by this Act, to a Deputy Information Officer(s). In his/her decision to delegate power of duty, the Information Officer must give due consideration to the need to render THE FIRM as accessible as reasonably possible for requests of its records.
- 13.5 The Deputy Information Officer's duties must only be exercised or performed subject to any conditions set by the Information Officer. The delegation of power does not prohibit the Information Officer from performing these duties himself/herself. The Information Officer may at any time withdraw or amend, in writing, the delegation of power of duty.
- 13.6 What to do if there is a data breach?**
- 13.6.1** Ascertain whether personal data was breached;
- 13.6.2** Assess the scope and impact by referring to the following:
- 13.6.2.1** Estimated number of data subjects whose personal data was possibly breached;
  - 13.6.2.2** Determine the possible types of personal data that were breached;
  - 13.6.2.3** List security measures that were already in place to prevent the breach from happening.
- 13.6.3** Once the risk of the breach is determined, the following parties need to be notified within 72 hours after being discovered:
- 13.6.3.1** The Information Regulator;
  - 13.6.3.2** Any data subjects who have been affected by such data breach;
  - 13.6.3.3** THE FIRM will only delay notification of the data subject if a public body responsible for the prevention, detection or investigation of offences or the Regulator determines that notification will impede a criminal investigation by the public body concerned.
- 13.6.4** The notification to a data subject will be in writing and communicated to the data subject in at least one of the following ways: a) Posted to the data subject's last known physical or postal address; or b)



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Sent by e-mail to the data subject's last known e-mail address; or c) Placed in a prominent position on the website of THE FIRM; or d) Published in the news media.

**13.6.5** Communication should include the following:

**13.6.5.1** Contact details of Information Officer;

**13.6.5.2** Details of the breach;

**13.6.5.3** Likely impact;

**13.6.5.4** Actions already in place, and those being initiated to minimise the impact of the data breach;

**13.6.5.5** Any further impact is being investigated (if required), and necessary actions to mitigate the impact are being taken;

**13.6.5.6** A description of the possible consequences of the security compromise;

**13.6.5.7** A description of the measures that THE FIRM intends to take or has taken to address the security compromise;

**13.6.5.8** A recommendation about the measures to be taken by the data subject to mitigate the possible adverse effects of the security compromise; and

**13.6.5.9** If known to THE FIRM, the identity of the unauthorised person who may have accessed or acquired the personal information.

**13.6.6** Review and monitor

**13.6.6.1** Once the personal data breach has been contained, THE FIRM will conduct a review of existing measures in place and explore the possible ways in which these measures can be strengthened to prevent a similar breach from reoccurring.

**13.6.6.2** All such identified measures should be monitored to ensure that the measures are satisfactorily implemented.

## 14 AVAILABILITY AND REVISION

A link to this Policy is made available at the office of THE FIRM at 9 Mitchell Street, MOSSELL BAY, 6500.



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This policy will continually be updated to comply with legislation, thereby ensuring that personal information will be secure but at the very least every 12 months.

### ANNEXURE A

### EMPLOYEE DECLARATION

I, \_\_\_\_\_

hereby declare the following –

1. I have read the contents of THE FIRM's JUNE 2022 POPIA DATA PRIVACY POLICY and now the FEBRUARY 2023 POPIA REVIEW to such Policy which were distributed or otherwise made available to me, and I have also attended the necessary training workshops offered in this regard; and
2. I acknowledge that to the extent that I do not understand any of my duties under POPIA and towards THE FIRM and if I am unsure, that I will contact SHARLENE whom I acknowledge to be THE FIRM's Information Officer; and
3. I have read and signed THE FIRM's EMPLOYEE DECLARATION which is attached to the JUNE 2022 POPIA POLICY;
4. I undertake to observe strictly and diligently all my duties imposed by POPIA, the JUNE 2022 POPIA DATA PRIVACY POLICY (with Annexures) and the FEBRUARY 2023 REVIEW POLICY (with Annexures) and fully understanding that my failure to do so –
  - 3.1 will potentially expose THE FIRM to unacceptable cyber and other data breach risks, as well as financial and reputational risk from the penalties that may be levied by the Information Regulator against THE FIRM for any instances of non-compliance with POPIA, the JUNE 2022 POPIA DATA PRIVACY POLICY and the FEBRUARY 2023 REVIEW POLICY; and
  - 3.2 is a criminal offence in terms of POPIA and constitutes serious misconduct in terms of THE FIRM's disciplinary code.



**FIONA WILLIAMSON**  
ATTORNEY • NOTARY • CONVEYANCER

 082 820 6428

 044 333 0127

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<b>NAME AND SURNAME:</b>	
<b>DATE AND PLACE OF SIGNATURE:</b>	
<b>SIGNATURE:</b>	



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### ANNEXURE B

#### CLIENT CONSENT

Transaction details:	
Client names and surname:	
Identification number:	
Company/Trust/Close Corporation name:	
Company/Trust/Close Corporation registration number:	
Representative details:	

I/we acknowledge that our/my personal and special personal information are required by THE FIRM OF FIONA WILLIAMSON in order to process the transaction in which THE FIRM OF FIONA WILLIAMSON has been mandated and I/we agree to provide such information requested from THE FIRM OF FIONA WILLIAMSON, on the express understanding that:

1. This constitutes my/our consent, as required under Section 11(1)(a) of the Protection of Personal Information Act 4 of 2013 ("POPIA").
2. The professional support secretarial and support services staff and the finance department of THE FIRM OF FIONA WILLIAMSON will access my/our information which has been furnished to them for the purposes of the transaction in which I am/we are involved and matters ancillary thereto.
3. THE FIRM OF FIONA WILLIAMSON is authorised to release my/our personal information to third party role players in the transaction cycle in which I am/we are involved.
4. THE FIRM OF FIONA WILLIAMSON is further authorized to share my/our personal information to any third-party service provider associated with THE FIRM and who support THE FIRM in fulfilling its operational duties and that, should I/we require information of these third-party service providers, that we shall request this directly from THE FIRM.
5. THE FIRM OF FIONA WILLIAMSON does not intend sharing my/our personal information for financial gain.



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6. THE FIRM OF FIONA WILLIAMSON will in addition to its POPIA compliance store our details on its systems and software support programs as provided for and specified by the Legal Practice Council from time to time.
7. THE FIRM OF FIONA WILLIAMSON has implemented proper Data Privacy rules in respect of their management of client information as well as proper Internet Usage Rules and Cyber security principles in order to minimise the risk of my/our information being exposed to cyber risks and /we have had an opportunity to read through such Policies and understand that it is my/our own duty to protect our /my own internet and email connections against interceptions and viruses.
8. THE FIRM OF FIONA WILLIAMSON, as firm of attorneys has the privilege of confidentiality under the law pertaining to its clients.
9. I/We confirm that:
  - 9.1 I/we have had an opportunity to review the POPIA Policies and rules of THE FIRM;
  - 9.2 I/we have had an opportunity to ask questions regarding my/our information, why it is collected, how it is processed, where it is stored and with whom it will be shared;
  - 9.3 I/we Consent to the collection, processing and necessary sharing of my/our information by THE FIRM OF FIONA WILLIAMSON in fulfilment of their mandate to deliver legal services to me/us.

<b>NAME AND SURNAME:</b>	
<b>DATE AND PLACE OF SIGNATURE:</b>	
<b>SIGNATURE:</b>	



FIONA WILLIAMSON  
ATTORNEY • NOTARY • CONVEYANCER

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## ANNEXURE C

### DIGIMUNE

**DIGITAL IDENTITY, PRIVACY AND SOCIAL MEDIA PROTECTION**

Businesses today rely on email, the web, social media and other public platforms to operate, engage customers, interact with employees and grow their organisations. This digital transformation is having a wide-ranging impact on the business environment, creating both opportunities and unique challenges and threats.

Digimune protects your organisation and individuals from the external threats introduced by social media, deep & dark web, fake news, app stores, and collaboration platforms.

**Your digital Public Attack Surface**

Your increased public attack surface gives attackers access to:

- Steal private or confidential information
- Hijack your social media accounts
- Impersonate you
- Perform targeted scams, phishing and malware attacks
- Spoof your web site
- Destroy your personal and brand reputation

This leaves you, your family and your business open to all kinds of cyber-attacks and scams.

**EVERY. SINGLE. MOMENT.**

**DIGIMUNE PREMIUM PROTECTION**

Social media pages are your organization's digital property, quickly and efficiently protecting your social media pages is a must have for doing business in the digital age.

**Protect**  
Corporate social media assets & brands

**Safeguard**  
Business & Customer Engagement

**Secure**  
Employees & the Business from Cyber & Physical Threats



**FIONA WILLIAMSON**  
ATTORNEY • NOTARY • CONVEYANCER

082 820 6428

044 333 0127

FIONA@FWLAW.CO.ZA

9 Mitchell Street | Mossel Bay  
PO BOX 713 6500


## REVIEW

# Protection of Personal Information DATA PRIVACY POLICY

FEBRUARY 2023

### ANNEXURE D

### VTS COMMUNICATIONS

	Phone: +27 44 695 0873 E-Mail: <a href="mailto:accounts@vtsconnect.net">accounts@vtsconnect.net</a> Web: <a href="http://www.vtsconnect.net">www.vtsconnect.net</a> VAT Nr: 446 0262 415 Company Reg: 2013/034472/07 Director: Taha Versi
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6/23/2022

To whom it may concern.

This is to confirm that Fiona Willams has a Watchguard Firebox T15 in place to protect their internal LAN from viruses and Bot Attacks

They have the following active services on the device that gets automatically updated via the internet:

Gateway Antivirus  
Intrusion Prevention Service  
WebBlocker  
File Exceptions  
SpamBlocker  
Botnet Detection  
Application Control  
Geolocation protection

The emails are hosted at Hetzner and a level 5 spam filter is applied to all incoming emails.

Best regards  
VTS Communications



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## REVIEW

# Protection of Personal Information DATA PRIVACY POLICY

FEBRUARY 2023

### ANNEXURE E

### LEXIS SECURE



## Lexis® Secure

### What is Lexis® Secure?

An online solution which allows for secure, transaction-based communication and document exchange between an organisation and their clients and other stakeholders.

**Lexis® Secure** provides a trusted alternative to email as a correspondence tool. All messages and documents are encrypted. Correspondence is linked to a transaction and is accessible to all relevant parties with the correct access.

The automated progress reporting tool allows you to send scheduled reports to selected stakeholders. They can also view progress in real-time by logging on to the Lexis Secure website.

Reports, notifications and the Lexis Secure website are branded according to the organisation's logo and colour scheme.

The flexible setup allows for organisations to manage transaction types and contact roles specific to their business, making the solution robust enough to be implemented across industries.

### Features

Secure Communication	Secure Documents	Automated Reports	Flexible Setup
<ul style="list-style-type: none"> <li>Private one on one correspondence.</li> <li>Group chats.</li> <li>Encrypted messages.</li> <li>Date and time stamped read receipts.</li> <li>Mobile friendly.</li> </ul>	<ul style="list-style-type: none"> <li>Encrypted Documents.</li> <li>Can be uploaded by your organisation or your contacts.</li> <li>Easy access to all shared documents securely stored online.</li> </ul>	<ul style="list-style-type: none"> <li>Scheduled progress reports emailed to your selected stakeholders.</li> <li>They can also view progress in real-time by logging on to the Lexis Secure website.</li> </ul>	<ul style="list-style-type: none"> <li>Create your own transaction types.</li> <li>Create your own contact roles.</li> <li>Apply your branding.</li> </ul>

### Why Lexis® Secure?

- With an increase of cyber fraud, customers are looking for trusted solutions other than email.
- Success with Lexis® SecureChat via Lexis® Convey, we have had many requests to be able to have the same solution in the rest of the business.
- Customers are looking for a secure way to share personal information and banking details.
- Easy access to all shared documents, securely stored online.
- Automated, branded scheduled progress reports.



 082 820 6428

 044 333 0127

 FIONA@FWLAW.CO.ZA

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9 Mitchell Street | Mossel Bay  
PO BOX 713 6500

## REVIEW

# Protection of Personal Information DATA PRIVACY POLICY

FEBRUARY 2023

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### POPIA CHECKLIST

NO.	REQUIREMENT DESCRIPTION	DONE
1.	POPIA POLICY ANNUAL REVIEW CONDUCTED	
2.	BUSINESS RESOLUTION SIGNED BY MANAGEMENT IMPLEMENTING THE REVIEW	
3.	LIST OF SERVICE SUPPLIERS COMPILED	
4.	OPERATOR'S AGREEMENT SENT TO EACH SERVICE SUPPLIER TO SIGN	
5.	TRAINING OF ALL EMPLOYEES IN RESPECT OF THE ANNUAL REVIEW	
6.	HAVE ALL EMPLOYEES SIGNED THE EMPLOYEE ACKNOWLEDGEMENT	
7.	NEW IMPROVED CLIENT CONSENTS IMPLEMENTED	