



IBIS PRIVACY POLICY

1. INTRODUCTION

As an international consulting firm, we are subject to the data protection legislation of the jurisdictions within which we operate. Despite our aim to take a consistent approach to the protection of personal information and to accord with all applicable legislation, we are aware that the particular rights, obligations and requirements pertaining to personal information and/or our data processing activities can vary in the different jurisdictions. As such, we endeavor to comply with, but not limited, the South African Protection of Personal Information act (POPIA), the General Data Protection Regulation (GDPR), the Kenyan Data Protection Act, 2019, Morocco's law No 09-08, Hong Kong's Personal Data Privacy Ordinance (PDPO), as well as Singapore's Personal Data Protection Act 2012. Where we have offices in jurisdictions with significantly different data protection laws, it may be that the contents of our Privacy Notice do not apply.

2. PRIVACY NOTICE

2.1 IBIS Consulting ("IBIS Consulting", "we", "us", or "our") appreciates the sensitivity of the personal information you may provide us through using our website and/or services. As such, we are committed to the effective management, security and confidentiality of same.

2.2 IBIS Consulting is strongly committed to protecting personal data. This privacy statement describes why and how we collect, use and, in certain circumstances, share personal data and provides information about individuals' rights in relation to personal data. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy notice or as otherwise stated at the point of collection.

2.3 In respect of your rights, kindly note that by accessing and/or using our website and/or services, you are deemed to have provided your express and voluntary consent to the processing of your personal information by IBIS Consulting and its subsidiaries. Same will remain valid for as long as you access and/or make use of our website and/or services. However, the use of your personal information will neither be unlawful nor for any purpose other than those purposes set out in our Privacy Policy as well as other applicable Policies and/or Laws.



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3. CHANGES TO OUR PRIVACY NOTICE

We reserve the right to change, update, add, remove and/or amend our Privacy Notices and or Policies independently from time to time. By accessing and/or using our website and/or services following changes to our Privacy Notice and or Policies, you will be considered to have consented thereto. As such, it is your responsibility to check for any such changes, updates, additions, removals and/or amendments. If you do not consent to any changes, updates, additions, removals and/or amendments we may make, you must immediately inform our offices by sending an email to informationofficer@ibisconsulting.com or www.ibisconsulting.com.

4. WHO IS RESPONSIBLE FOR YOUR PERSONAL INFORMATION

4.1 IBIS Consulting is responsible for your personal information.

4.2 IBIS Consulting has appointed an Information Officer and any questions, comments and/or requests regarding our Privacy Policy are welcomed and may be directed to informationofficer@ibisconsulting.com or www.ibisconsulting.com.

5. YOUR RESPONSIBILITIES

4.1 Your responsibilities under our Privacy Notice are to:

- 5.1.1 Read and understand our Privacy Notice and other applicable Policies and/or Laws before you access and/or use our website and/or services;
- 5.1.2 Read and understand the other contracts that may be between us as they may contain further terms related to your privacy and treatment of your personal information; and
- 5.1.3 Ensure that you have the authority to provide us with the necessary consent and/or personal information if it pertains to a third party. If you do same, you warrant that you have authority to do so.

6. WHAT PERSONAL INFORMATION IS COLLECTED

5.1 We may process, where applicable, the following personal information from you or a third party on your behalf:

- 6.1.1 Personal details – initials, first name, surname, an e-mail address
- 6.1.2 Cookies;
- 6.1.3 Marketing and social media – your interactions with our social media account and marketing campaigns and/or materials;
- 6.1.4 Consent – where we have gained your express and voluntary content to process your personal information.



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7. PURPOSE/S FOR COLLECTION AND PROCESSING OF PERSONAL INFORMATION

6.1 IBIS Consulting processes personal data for numerous purposes. Our policy is to be transparent about why and how we process personal information. The law in the applicable jurisdiction in which you find yourself may require us to set out the legal grounds on which we rely in order to process your personal information. IBIS Consulting shall only collect your personal information for a specific, explicitly defined and lawful purpose relating to a function or activity of IBIS Consulting's business, which may include, but is not limited to, the following:

- 7.1.1 to enter into a contract with you and/or to enable a partner to contact you and enter into a contract with you;
- 7.1.2 to perform any obligations under a contract with you;
- 7.1.3 to comply with a legal obligation;
- 7.1.4 to protect a legitimate interest (unless you have specifically objected in writing to all or some of the processing activities on reasonable grounds);
- 7.1.5 to pursue our own legitimate interests or the legitimate interests of a third party who it is sharing the information with (unless you have specifically objected in writing to all or some of the processing activities on reasonable grounds);
- 7.1.6 to process personal information for direct marketing purposes (where you have opted in to receiving any direct marketing material and/or other informative material);
- 7.1.7 to customise and display content including, but not limited to products, articles, listings and advertisement to you in a way that IBIS Consulting feels may interest you or be most beneficial to them;
- 7.1.8 to send content including, but not limited to products, articles, listings and advertisement content to the User via email or other electronic media, where you have consented to be contacted by IBIS Consulting or their agent with such content;
- 7.1.9 to enable you to voluntarily participate in interactive features on the website; and
- 7.1.10 to notify you about changes to the website or services.

7.2 The supply of personal information to IBIS Consulting is voluntary and not mandatory. However, if the you refuse to supply any personal information, certain consequences may naturally flow from such a refusal, such as preventing IBIS Consulting from concluding or performing any contract with you, or preventing IBIS Consulting from complying with one or more of its obligations in law.



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8. DISCLOSURE

8.1 We may also disclose personal information under the following circumstances:

8.1.1 with affiliates, third party operators who perform certain processing activities on behalf of IBIS Consulting, professional advisers, for example, law firms, as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our business. Personal data may be shared with these advisers as necessary in connection with the services they have been engaged to provide:

8.1.1.1 when explicitly requested by you

8.1.1.2 when required to deliver publications or reference materials requested by you

8.1.1.3 when required to facilitate conferences or events hosted by a third party;

8.1.1.4 to law enforcement, regulatory and other government agencies and to professional bodies, as required by and/or in accordance with applicable law or regulation. IBIS Consulting, may also review and use your personal information to determine whether disclosure is required or permitted.

9. SECURITY

8.1 We have implemented generally accepted standards of technology and operational security in order to protect personal from loss, misuse, alteration or destruction.

8.2 Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet is never completely secure and therefore we cannot ensure absolute security of your personal information, we will, however, work to mitigate privacy issues.

10. RETENTION POLICY

9.1 We will keep full and accurate records of all our processing activities in accordance with the data processing laws and related requirements.

9.2 Unless stated otherwise in our Privacy Policy, we will only keep any record of any personal information collected for as long as it is legally required and/or necessary to achieve the purpose for which we collected such information.

9.3 IBIS Consulting may, if it has de-identified personal information, keep such information for historical, statistical or research purposes. IBIS Consulting shall ensure that appropriate safeguards are in place to prevent those records from being used for any other purposes, or against the information be re-identified.



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11. YOUR RIGHTS

10.1 You may have a legal right to:

- 11.1.1 obtain confirmation as to whether we process personal data about you, receive a copy of your personal data and obtain certain other information about how and why we process your personal data;
- 11.1.2 the right to request for your personal data to be amended or rectified where it is inaccurate and to have incomplete personal data completed;
- 11.1.3 the right to delete your personal data;
- 11.1.4 the right to restrict personal data processing;
- 11.1.5 the right to object to the processing of your personal data;
- 11.1.6 the right to data portability;
- 11.1.7 the right to withdraw consent.

You may make a request in terms of this clause by following the process for making such a request, as set out in IBIS Consulting's PAIA Manual, submitting a request using the Data Subject Access Request Form OR by sending an email to the information officer (informationofficer@ibisconsulting.com).

12. CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

11.1 IBIS Consulting may transfer personal information to another country in the following circumstances:

- 11.1.1 the transfer is necessary for the performance of a contract that IBIS Consulting has with you;
- 11.1.2 the transfer is necessary for the conclusion or performance of a contract with a third party which is to the benefit of or in your interest;
- 11.1.3 the transfer is otherwise for your benefit; or
- 11.1.4 You have consented to the transfer of their information.

11.2 If IBIS Consulting is required to transfer personal information from South Africa to a third party in a foreign country, it shall ensure that the third party is subject to a law, binding code of conduct or contract which effectively upholds principles for the reasonable processing of personal information which are substantially similar to the data protection offered in the Republic of South Africa.



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13. CONSENT

13.1 You hereby consent to the processing of the personal information in terms of the provisions of this Privacy Notice. You acknowledge and agree that such consent has been given voluntarily after you have read and understood the provisions of this Privacy Notice.

13.2 Should you wish to withdraw any consent previously given by you, you must notify IBIS Consulting's information officer (informationofficer@ibisconsulting.com) in writing.

VERSION CONTROL

ROLE	NAME	POSITION	DATE	SIGNATURE
Author	Rizwana Mohammed	Finance Director	30/06/2022	
Approved by	Simon Clarke	Director	30/06/2022	