

TLOK's Commitment to Information Privacy

At TLOK, the collection and processing of your personal information is important to us. We are committed to handling your personal information in the right way, for the right reasons. Our Privacy Statement outlines TLOK's practices in this regard.

1. TLOK Accountants CC (TLOK), Registration Number 1993/009596/23 has offices in Johannesburg and Ballito:
 - 1.1.2 Apollo Road, Sundowner, Gauteng, 2161; and
 - 1.2.71 Springwood Villas, Umhlali Golf Estate, Umhlali, KZN, 4390
2. TLOK promises to treat all your personal information carefully and responsibly.
3. Personal information includes any information that lets TLOK identify you, such as your name/s and surname, income tax number, combined with your physical address, contact details and/or identity/passport number.
4. Personal information also refers to the personal information that uniquely identifies a legal entity, such as the trading name of a company combined with the company registration number.
5. Personal information may be given to or collected by TLOK in writing, electronically (email), telephonically, online (social media platforms).
6. Processing of personal information includes any initial processing that TLOK does when we first collect your personal information. It also includes any further and ongoing processing that TLOK is allowed to carry out legitimately in terms of the reasons listed in paragraph 8 (below). The term 'processing' includes collecting, using, altering, merging, linking, organising, disseminating, storing, retrieving, disclosing, erasing, archiving, destroying or disposing of personal information.
7. TLOK will only collect and process your personal information for the reason you provided it to us, or to enable us to comply with the requirements of specific local or foreign laws that we are governed by; or to comply with any regulations, directives, judgments or court orders, government sanctions or embargoes, reporting requirements under financial transactions legislation, and demands of any authority, regulator, tribunal, enforcement agency or exchange body.
8. TLOK may process your personal information to protect your or our legitimate interests. TLOK will not collect and process personal information about you that we do not need for this purpose. The general purposes for which TLOK collects and processes your personal information includes, but is not limited to:
 - 8.1 Creating a record of you on our systems to verify your identity, provide you with the required services you have requested and then communicate with and keep you informed about these services;
 - 8.2 Providing accounting, taxation, statutory and business advisory services;
 - 8.3 Identifying you and verifying your physical address, source of funds, income and similar information as may be required by SARS, CIPC and other Statutory and Governmental bodies;
 - 8.4 Assessing your personal financial circumstances and needs before providing either advice and/or services to you. In this regard, we may collect your personal information from you in your capacity as our prospective customer;

- 8.5 Enforcing our obligations, including without limitation the collection of amounts outstanding from you;
 - 8.6 Providing income tax-related information to tax authorities;
 - 8.7 Conducting surveys to gauge customer or employee sentiment or to improve our product and service offering;
 - 8.8 Where you have applied for employment at TLOK we perform applicant screening and background checks, and such screening may include social media screening and screening relating to any information about you we may obtain from publically available sources such as search engine results;
 - 8.9 Where you are a TLOK employee (including contractors), we create an employment record of you on our systems to facilitate continuous monitoring during your employment with us;
 - 8.10 Where you've been identified as a next of kin by an employee or customer, we create a record of you on our systems; and
 - 8.11 Where you are a supplier to TLOK, we process your personal information for due diligence, risk assessment, administrative and payment purposes.
9. Furthermore, TLOK will not process your special personal information unless:
- 9.1. You have consented to TLOK processing it (in circumstances where we are legally obliged to obtain your consent); or
 - 9.2. It is necessary to exercise or defend a right or obligation in law; or
 - 9.3. It is necessary to comply with an international legal obligation of public interest; or
 - 9.4. It is for certain historical, research or statistical purposes that would not adversely affect your privacy; or
 - 9.5. You have deliberately made your personal information public.
10. There are some personal information fields that you have to provide if you want TLOK to provide you with your chosen service or onboard you as an employee, client, supplier, or job applicant. This information can be provided in writing, electronically or telephonically, but it must be accurate and complete. If TLOK does not receive the necessary personal information, we will not be able to continue with our service offering. If you are already a customer/employee/supplier and TLOK asks you for this information and you do not provide it, TLOK will have to suspend the provision of the services for a period of time, or as the case may be, even terminate our relationship with you.
11. In most cases, personal information will be collected directly from you, but there may be other instances when TLOK will collect personal information from other sources. These may include public records, places where you may already have made your personal information public (for example, on social media where your settings on such social media are set to 'public'), credit bureaus, or individuals/directors whom you have appointed as your representative, where you are a corporate entity. TLOK will only collect your personal information from other sources where we are legally entitled or obliged to do so, and you are entitled to ask TLOK which sources TLOK used to collect your personal information.
12. For the purposes outlined in paragraph 8 (above), TLOK will, in most instances, collect and process your personal information internally. However, there are times when TLOK needs to outsource these functions to third parties. Where your personal information is shared internally within TLOK, such sharing will be carried out only for the purposes outlined in paragraph 8 (above). TLOK may also need to share your personal information with external organisations, such as credit bureaus, tax authorities or other regulatory or industry bodies, so

that we can meet our due diligence or regulatory requirements. We may need to share your personal information with our business partners or counterparties, where we are involved in corporate transactions relating to the sale or transfer of any of your businesses, legal entities or assets, or to any party to whom we assign our rights under any of our agreements for particular services.

13. TLOK will not share your personal information with third parties who do not need your personal information, or where TLOK is not legally permitted to do so. When TLOK decides to transfer your personal information to third parties, we will only provide it to organisations that have data privacy policies equivalent to TLOK's, or subject to appropriate contractual obligations, or to those who are subject to laws relating to the processing of personal information that are similar to those that apply to TLOK.
14. As a TLOK customer, we may use your personal information to tell you about products or services we think you might be interested in.
15. As a non-customer, if you would like to know more about TLOK's services, please submit your details to us in writing.
16. We will adhere to your communication preferences whenever we can, but we may need to send you important communications via a channel that is not your preference. We will only do so in cases where we deem the information to be important and relevant for you.
17. To the extent that local legislation permits or if you are a resident of the European Union or United Kingdom, you have the following rights regarding your personal information:
 - 17.1. The right to access your personal information that we have on record. Please refer to our [PAIA Manual](#) or the process to access your personal information.
 - 17.2. You have the right to ask TLOK to correct any of your personal information that is incorrect.
 - 17.3. You can ask TLOK to delete or destroy your personal information. You can also object to TLOK processing your personal information. These requests must be sent to TLOK in writing and emailed to info@tlok.co.za. However, the result of such a request will be that TLOK may have to suspend the provision of services for a period of time, or even terminate our relationship with you. TLOK's records are subject to regulatory retention periods, which means that TLOK may not be able to delete or destroy your personal information immediately upon request.
18. If you have a complaint relating to the protection of your personal information, including the way in which it has been collected or processed by TLOK, please contact us using the local contact details as listed in paragraph 20 below. If you have not had your complaint dealt with satisfactorily, you may lodge a complaint with your local privacy regulator in terms of applicable privacy laws.
19. TLOK reserves the right to change this statement at any time. All changes to this statement will be posted on the website. Unless otherwise stated, the current version shall supersede and replace all previous versions of this statement.
20. **Contact details:**

Landline: (011) 794-5582 or email info@tlok.co.za