

## BROOKS & LUYT INCORPORATED - Privacy Notice

This privacy notice provides details of the personal information we collect from you, what we do with it, how you might access it and who it might be shared with.

### Our Organisation

BROOKS & LUYT INCORPORATED  
132 Jan Smuts Avenue  
Rosebank  
2196  
South Africa  
Telephone: +27 11 543 9000  
Organisation email: [compliance@csssolutions.co.za](mailto:compliance@csssolutions.co.za)

### What we do with your personal information

We use your personal information only for the purpose for which it is collected. Among others, this purpose could be to provide a service, assist us with administration, recruit prospective employees or even to comply with a legal obligation. We may use your personal information for other similar purposes, including marketing and communications, but that will only occur in the case where we have your consent or another lawful justification for doing so.

From our **Customers** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Legal Debt Collection Process	To conclude or perform a contract to which the data subject is party	Until legal retention period expires
Legal advice and representation	To conclude or perform a contract to which the data subject is party	Until legal retention period expires

### What personal information do we collect?

We only collect the minimum amount of information that is relevant to the purpose. If you interact with us on the internet, the personal information we collect depends on whether you just visit our website or, use our services. If you visit our website, your browser transmits some data automatically, such as your browsing times, the data transmitted and your IP address.

If you use our services, personal information is required to fulfil the requirements of that service.

Generally, we collect the following personal information. If there is any *specific* personal information to collect, we will indicate as such, at or near the time of collection.

- Telephone number
- Confidential Correspondence
- Email address
- Name, together with other identifying information
- Online identifier
- Financial & banking details
- Physical address
- Identification Number
- Location information

We collect your personal information from the following indirect sources:

Data subject type	Personal information type	Indirect source name
Customers	Physical address	Tracing Bureaus
Customers	Physical address	Clients (Responsible Party)
Customers	Telephone number	Tracing Bureaus
Customers	Telephone number	Clients (Responsible Party)
Customers	Email address	Tracing Bureaus
Customers	Email address	Clients (Responsible Party)
Customers	Financial & banking details	Clients (Responsible Party)
Customers	Name, together with other identifying information	Clients (Responsible Party)
Customers	Identification Number	Clients (Responsible Party)

### Who might we share your personal information with?

To maintain and improve our services, your personal information may need to be shared with or disclosed to our service providers, other organisations such as ours or, in some cases, public or legal authorities.

We transfer personal information to the following organisations and countries:

Data subject type	Organisation name	Type	Country
Customers	Trackers and Tracers	Operator	South Africa
Customers	Correspondents	Operator	South Africa
Customers	Legal Proof	Operator	South Africa
Customers	Legal Serve	Operator	South Africa
Customers	Real Pay	Operator	South Africa
Customers	Reflex Solutions	Operator	South Africa
Customers	Registered Communication	Operator	South Africa
Customers	Sheriffs of South Africa	Operator	South Africa
Customers	Zaliwa	Operator	South Africa
Customers	SMS Portal	Operator	South Africa
Customers	Advocates	Operator	South Africa

If we transfer your personal information outside of South Africa, we apply the necessary safeguards which include, confirming whether the receiving country has the proper data protection law, ensuring that there is a binding agreement between parties or, if the transfer is internal to our organisation, commitment to binding corporate rules. Details of these safeguards may be obtained by contacting us directly.

### How do we look after personal information?

We limit the amount of personal information collected to only what is fit for the purposes as described above. We restrict, secure, and control all our information assets against unauthorised access, damage, loss, or destruction; whether physical or electronic. We retain personal information only for as long as is described above, to respond to your requests, or longer if required by law. If we retain your personal information for historical or statistical purposes, we ensure that the personal information cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal information.

## How can you access your personal information?

You have the right to request access to any of your personal information we may hold. If any of that information is incorrect, you may request that we correct it. If we are improperly using your information, you may request that we stop using it or even delete it completely.

**If you would like to make a request to see what personal information of yours we might hold, you may make a request from our organisation website or contact us as per the details in this document.**

Where you have previously given your consent to process your personal information, you also have the right to request that we transmit your personal information to a different service provider.

Where it may have been necessary to get your consent to use your personal information, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal information without affecting the lawfulness of processing based on consent before your withdrawal.

## Our Information Officer

Werner Venter

[compliance@csssolutions.co.za](mailto:compliance@csssolutions.co.za)

Telephone: +27 11 543 9000

## The SA Information Regulator

You have the right to lodge a complaint with the SA Information Regulator. See the Information Regulator contact details below.

### **The Information Regulator (South Africa)**

PO Box 31533  
Braamfontein  
27 Stiemens St  
Braamfontein  
2017

Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

Complaints: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

Telephone: +27 82 746 4173