

# Privacy Policy

## 1. INTRODUCTION

Black and Orange Creative (Pty) Ltd (Black and Orange) recognizes the importance of privacy and the protection of personal information provided to it and is committed to the safeguarding of such information.

This privacy policy explains how Black and Orange collects and uses personal information. It contains information regarding the rights of natural and juristic persons to whom personal information relates (data subjects).

Black and Orange reserves the right to amend this Privacy Policy or add provisions to it at any time by publishing an updated version on its website.

## 2. COLLECTION OF INFORMATION

Black and Orange collects personal information in various instances, including when:

- data subjects contact Black and Orange or request information or services;
- Black and Orange provides services to data subjects;
- persons apply for employment at Black and Orange;
- when persons use Black and Orange's websites or engage with Black and Orange through social media.

The interaction with Black and Orange on Black and Orange's website will result in the collection of information regarding the person's activities on the website. Similarly, when anyone engages with Black and Orange via any one of Black and Orange's social media platforms. This information includes, but is not limited to, the person's name, contact details and information regarding the matter with which they need assistance.

In the course of engaging with clients on matters, Black and Orange will naturally be exposed to and collect personal information which includes the data subject's name and contact details as well as information regarding the matters that we need to assist them with.

As part of its recruitment processes, Black and Orange collects information from graduates and employment applicants. This information includes educational information as well as employment history. By enquiring regarding employment opportunities at Black and Orange or applying for employment, applicants are deemed to provide their consent to Black and Orange's processing of their personal information for recruitment purposes, which may include screening as well as background and reference checks.

## 3. BASIS AND PURPOSE FOR PROCESSING PERSONAL INFORMATION

Black and Orange may process personal information:

- to provide services to clients;
- to comply with legal or regulatory obligations;
- if a data subject has provided their consent; or
- if the processing is allowed by law.

The purposes for which Black and Orange processes personal information include, but are not limited to:

- marketing and promotion of Black and Orange's services;
- providing and improving services to clients;
- improving users' experience when using Black and Orange's websites;
- communicating with persons for Black and Orange's internal purposes;
- enabling Black and Orange's internal operations;
- exercising and defending legal rights.

#### **4. DISCLOSURE OF PERSONAL INFORMATION**

Black and Orange may release personal information or disclose it to third parties in certain circumstances. These include, but are not limited to:

- if Black and Orange is required or authorised to do so by law or a court order;
- in order for Black and Orange to enforce its rights;
- in order for Black and Orange to provide services to its clients.

The third parties to whom we disclose personal information include, but are not limited to:

- advocates and other parties involved in legal services;
- third party service providers to Black and Orange or its clients;
- third parties who provide research services to Black and Orange or its clients;
- government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies.

#### **5. TRANSFER OF PERSONAL INFORMATION**

Personal information collected by Black and Orange may be transferred to persons in other countries. Those countries' laws might not protect personal information in the same way or on the same level as the law in the data subject's country. However, Black and Orange will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

#### **6. RETENTION OF PERSONAL INFORMATION**

Black and Orange retains personal information for as long as may be reasonably necessary in accordance with applicable law.

#### **7. COOKIES**

Black and Orange websites makes use of cookies. Cookies store information regarding website visitors. Cookies have various purposes, such as improving the visitor's experience on the website and facilitating their use of the website.

#### **8. DIRECT MARKETING**

Black and Orange may send marketing and promotional communications and material to persons. Recipients may opt out from receiving such communications by contacting Black and Orange at the details provided below or by clicking on the opt-out link that will be contained in the relevant electronic communication.

#### **9. SECURITY**

Black and Orange takes all reasonable steps to protect and avoid unauthorised access to personal information. It has implemented various policies, procedures, and software to safeguard personal information and routinely reviews its operations in order to ensure that personal information is adequately protected.

## **10. DATA SUBJECT RIGHTS**

The law might provide data subjects with rights to access, amend or delete personal information that is in the possession of Black and Orange. However, Black and Orange may, in certain instances, legally refuse or decline such requests. If applicable, a data subject may also have the right to object to Black and Orange's processing of their personal information or to file a complaint with a regulator. If a data subject wishes to exercise their rights, they can contact Black and Orange at the details provided below. Black and Orange may charge data subjects a fee for accessing, amending or deleting their personal information.

Data subjects are encouraged to contact Black and Orange in order to update their personal information as and when necessary.

## **11. CONTACT DETAILS**

In order to contact Black and Orange for purposes relating to this privacy policy, please contact us using these contact details:

Black and Orange Creative  
77 Amatole Street,  
West Gate,  
Pretoria,  
0004

Telephone: +27 12 803 0223

E-mail: [info@blackandorange.co.za](mailto:info@blackandorange.co.za)

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