



## PRIVACY POLICY

### 1. Definitions

- 1.1. We, our, us or SCSG: Sentinel Commercial Services Group (Pty) Ltd  
Reg: 2016/079327/07  
Address: Office Annex, 5 St Mark Street, Bethanie, Eversdal, Durbanville
- 1.2. Client or you: any prospective, new or existing client of SCSG.
- 1.3. Website: means any website with a domain validly registered to SCSG.

By using our Website you confirm you are 18 (eighteen) years or older and agree to the terms and conditions set out below. If you do not agree with this Policy, do not use our Website.

### 2. Information Collection

- 2.1. While using our Website, we may ask you to provide us with certain Personal Information that can be used to contact or identify you. Depending on the nature of your interaction with us we may ask you for information such as your name, contact details, company name and financial data ("Personal Information"). In each case we will only collect information which is necessary and appropriate to fulfil the purpose of your interaction with us.
- 2.2. We collect information about you and any other person whose information you provide directly or indirectly as follows:
- 2.2.1. When you complete a service questionnaire, mandate, consent or other form, whether electronically, telephonically or paper-based;
- 2.2.2. When you interact with us via our Website, social media accounts, telephone, email or other method of communication;
- 2.2.3. From third-party sources like Businesses For Sale, Gumtree, or any other party to whom you have given such information for the purpose of sharing it with us.
- 2.3. Where you provide the Personal Information of a third party, it is your duty to notify such party you have disclosed their information to us, and that it will be processed in accordance with this Policy.
- 2.4. We may conduct online searches and obtain your Personal Information from public records such as CIPC, Deeds Registries, the Financial Intelligence Centre and other third parties that hold such information.
- 2.5. The information we collect and process, includes among other things:

- 2.5.1. Names, addresses, contact details, identity number, entity name, registration number, bank details, operational details and other financial information.
- 2.5.2. Correspondence or enquiries from you and anyone acting on your behalf. As well as correspondence with third parties in the course of performing our services in terms of our business relationship with you.
- 2.5.3. Copies of contracts or agreements concluded with us or through us in the use of our services.
- 2.5.4. Special Personal Information, such as images of your business or assets, credit reports and other information as required in terms of our business relationship with you.
- 2.5.5. If you are a contractor, employee or representative of SCSG, we will collect information regarding your banking details, employment history, qualifications, next of kin and any other information required to maintain and record our business relationship with you.
- 2.6. We may require certain Personal Information in order for us to comply with our legal obligations in terms of the Financial Intelligence Centre Act and other legislation. Should you fail to provide such information, we retain the right to limit or terminate our business relationship with you and take any further action as required in law.

### **3. Use of Personal Information**

- 3.1. We may process and use your Personal Information for the following purposes:
  - 3.1.1. To provide you with the service you requested, which may include but is not limited to business consulting, valuation of assets, sale facilitation, mergers, and acquisitions.
  - 3.1.2. To keep you informed of businesses or properties in which you have expressed an interest.
  - 3.1.3. To fulfil our legal and record keeping requirements in terms of law.
  - 3.1.4. Verifying your identity, authority to act on behalf of a third party and screening against the sanction lists updated by the Financial Intelligence Centre from time to time.
  - 3.1.5. To comply with a lawful request by law enforcement agencies, regulatory bodies, court orders or a similar request.
  - 3.1.6. Conducting market research.
  - 3.1.7. To evaluate and improve our service offering.
  - 3.1.8. In cases where you withdraw consent to the processing of your Personal Information or have unsubscribed from receiving certain marketing communication from us, we may retain your details to ensure we are able to comply with such instruction and/or do not send you communication in future.

- 3.1.9. Requesting consumer credit reports, property reports or similar documents, if required.
- 3.1.10. If you are an employee, representative or contractor of SCSG, we may use your information to fulfil the contractual obligations between us.

#### **4. Disclosure of Personal Information**

- 4.1. In order to provide our services, we may need to disclose your Personal Information to third parties. Set out below are the circumstance under which your Personal Information may be shared with third parties:
  - 4.1.1. Your Personal Information may be shared with our agents, sub-contractors, companies or business units and selected third parties who process information on our behalf.
  - 4.1.2. We may disclose your information to the owner, seller, buyer, tenant, lessee or lessor of a business or property, or a third party, in order to facilitate and/or conclude a commercial transaction.
  - 4.1.3. To market your assets, business, property, or other investment opportunity in accordance with the mandate provided to us.
  - 4.1.4. When required, to obtain a credit report.
  - 4.1.5. To confirm your identity and/or authority to act on behalf of a third party or principal.
  - 4.1.6. When we are legally obliged to provide such information.
- 4.2. We may need transfer your information to an agent, sub-contractor or third party located outside of South Africa, in order to provide you with the service for which we have been mandated. We will in such circumstances require the information to be treated as confidential and with the utmost care and security as required in law.

#### **5. Business Sale**

In the event that our business is sold, merged, or wound up, your Personal Information may be disclosed to our advisors and any prospective purchaser and their advisors, and will be passed on to the new owners of the business.

#### **6. Retention of your Personal Information**

- 6.1. We are required to retain your information for the minimum periods required in terms of legislation applicable to SCSG.
- 6.2. We may retain certain limited Personal Information indefinitely for record keeping and statistical purposes.
- 6.3. Should you object to the retention of your information, you may contact the Information Officer listed below.

## **7. Access to, Correction and Deletion of Personal Information**

- 7.1. You have a legal right to request a record of the Personal Information we hold about you.
- 7.2. You may request that we correct or update any Personal Information we hold about you.
- 7.3. Should you fail to keep your information updated or provide inaccurate or incomplete information, we may limit our service offering to you and in certain cases terminate our relationship with you.
- 7.4. Under certain circumstances you are entitled to request the deletion, destruction of your Personal Information or object to the processing thereof. In such event, kindly contact the Information Officer using the contact details below.

## **8. Log Data**

We may collect anonymous information when you visit our Website, to help it provide better customer service.

## **9. Disclaimer**

- 9.1. We make no representations or warranties regarding the information on the Website.
- 9.2. We shall not be liable for any damages to or viruses that may infect, your computer equipment or other property on account of accessing, using, browsing or downloading material from the Website.

## **10. Changes to Privacy Policy**

- 10.1. We may update this Policy from time to time. Changes will be effected by posting the updated policy on our Website. We urge you to review this Policy regularly.
- 10.2. The most updated version of this Policy will apply each time you access our Website.

## **11. Contact Details**

Should you have any questions, complaints or require further information relating to this Policy, or the processing and use of your Personal Information, kindly contact the Information Officer by sending an email to [commercial@scsgroup.co.za](mailto:commercial@scsgroup.co.za).

## **12. Information Regulator**

You further have the right to approach or lodge a complaint with the Information Regulator, whose contact details appear below:

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

General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)