

## BOWMANS Privacy Policy in respect of CRM Programme

### Introduction

Bowmans has implemented a new client relationship management (**CRM**) programme. This privacy policy applies to all information collected and used by the affiliate firms in Bowmans for the purposes of the CRM programme.

The Bowmans affiliate firms covered by this privacy policy are: Bowman Gilfillan Inc. (165 West Street, Sandton, 2146, Republic of South Africa), Coulson Harney Advocates (5th floor, ICEA Lion Centre, West Wing, Riverside Park, Chiromo Road, Nairobi, Republic of Kenya), AF Mpanga Advocates (4th Floor, DFCU Towers, Plot 26 Kyaddondo Road, Nakasero, Kampala, Republic of Uganda), Bowmans Tanzania Limited (2nd Floor, The Luminary, Cnr Haile Selassie and Chole Roads, Masaki, Dar es Salaam, Tanzania)

### Collection and use of personal information

Personal information is information relating to: an identifiable natural person and, in some instances, a legal person that can be used to identify or contact that person.

Bowmans collects certain personal information from clients or prospective clients for the purpose of providing legal services to such clients or prospective clients. Bowmans may also collect other personal information to manage its relationship with clients and prospective clients as part of its CRM programme and for general business development purposes. Bowmans may use certain of the personal information which it collects for the purpose of providing legal services, such as a client's name and contact details, for CRM and business development purposes in order to improve our client offerings and to market our services. The affiliate firms in Bowmans may share the personal information that they collect with each other. You are not required to provide any additional personal information that may be requested from you for CRM and business development purposes.

### What information does Bowmans collect for the purposes of this privacy policy and how may it be used?

#### *Information collected*

Bowmans collects personal information from clients and prospective clients for the purpose of providing legal services to them. This information includes, for example, the client's or prospective client's name, email address, telephone numbers, physical address, billing address, and contact person. Some information is required by law to be provided in accordance with, amongst other things, anti-money laundering legislation such as identity numbers. Bowmans may collect further personal

information where necessary to provide requested legal services such as employment information, health information, educational records, and other confidential information.

For CRM and business development purposes Bowmans may collect information relating to the client's or prospective client's gender, religion, birthday, allergies, dietary requirements, employment history, disability, personal preferences, and Bowmans partners' insights on the client or prospective client and details of legal services provided.

#### *How information is used*

Certain of the personal information which Bowmans collects such as a client's or prospective client's name and contact details is used to contact the client or prospective client in the provision of legal services, and to invoice clients. This information may also be used for business development and CRM purposes. It may be shared by the legal professionals who obtain it with Bowmans's marketing and business development departments for CRM, business development and marketing purposes. Bowmans may then use a client's or prospective client's name and contact details to send the client legal updates, invitations to client events, and promotional materials. You can opt out of receiving such communications and cancel your subscription to any of the Bowmans mailing lists by clicking on the "Update my details and manage my subscriptions" or "Unsubscribe from all Bowmans marketing communications" hyperlinks which are found at the bottom of all our communications.

Bowmans may use information that is collected for CRM, business development and marketing purposes to manage and analyse client interactions with the goal of improving business relationships with clients, and assisting in client retention and attraction.

Confidential client information and information which is obtained in order to comply with legal requirements is used exclusively in the provision of the requested legal services or to comply with the applicable legal requirements, is never used for CRM and business development purposes, and falls outside the scope of this policy.

#### Disclosure to third parties

Bowmans comprises several affiliate firms. Information collected in accordance with this privacy policy by one firm may be shared with other firms in Bowmans for CRM, business development and marketing purposes. Personal information will only be shared between affiliate firms in Bowmans to improve the services offered by Bowmans firms. Information will not be shared with third parties for their own marketing purposes.

BGAG or any of the affiliate firms may be required by law to disclose personal information collected in

accordance with this privacy policy such as for law enforcement purposes, pursuant to litigation or requests from government authorities in and outside the jurisdictions where Bowmans operates.

Personal information collected under this privacy policy may be disclosed to an acquirer or prospective acquirer in the event of a merger, sale or restructuring of Bowmans or any of the affiliate firms.

#### Service providers

Bowmans may share personal information with service providers appointed by Bowmans or any of its affiliate firms to perform CRM, marketing and business development activities on behalf of Bowmans or any of its affiliate firms. These service providers are contractually required to protect any personal information shared with them and to treat any personal information that they receive in a manner consistent with this privacy policy.

#### Cross-border transfers of personal information

Bowmans operates in a number of jurisdictions. Information collected by affiliate firms may be shared with other affiliate firms in other jurisdictions.

#### Retention of personal information

Bowmans will keep the personal information described in this privacy policy only for as long as is necessary to fulfil the purposes outlined in the policy unless Bowmans or any of the affiliate firms is required by law to retain the information for a longer period.

#### Security of personal information

Personal information collected and stored for the purposes outlined in this policy is stored securely on IT systems with restricted access and physical and logical security features.

#### Access to personal information

You can update your contact details and preferences in receiving legal updates, invitations to client events, and promotional materials from Bowmans at any time by clicking on the “Update my details and manage my subscriptions” or “Unsubscribe from all Bowmans marketing communications” hyperlinks which are found at the bottom of all our communications. You can request access to any of your personal information that is held by Bowmans at any time and for any purpose, including to request that Bowmans corrects the personal information if it is inaccurate or deletes the personal information if Bowmans is not required to retain it by law or for legitimate business purposes. Requests to access personal information held on you in accordance with this privacy policy can be made to Neil van Vuuren, Group Risk Manager at: [n.vanvuuren@bowman.co.za](mailto:n.vanvuuren@bowman.co.za) .

### Updates to this privacy policy

This privacy policy was updated on 14 September 2016. Bowmans may update the privacy policy from time to time and will notify you of any material changes in advance of those changes taking effect.

### Questions

If you have any questions or complaints regarding Bowmans' processing of your personal information in terms of this privacy policy, please contact Neil van Vuuren, Group Risk Manager at: [n.vanvuuren@bowman.co.za](mailto:n.vanvuuren@bowman.co.za). If you are not satisfied with the response that you receive from Bowmans, you may, where applicable, contact the relevant data protection regulator in your jurisdiction. Bowmans will provide information on the manner in which complaints to regulators may be made, if requested to do so.