



THE PROTECTION OF PERSONAL INFORMATION ACT PRIVACY POLICY

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1. Scope And Purpose

In our mandate to create value for our stakeholders, we may, in certain instances, be required to process personal information. This policy explains how we obtain, use, and disclose personal information, in accordance with the requirements of the Protection of Personal Information Act 4 of 2013.

At **JEC Technologies Pty Ltd** we are committed to protecting the privacy and we strive to ensure that personal information is collected and used appropriately, lawfully, and transparently. This document declares our commitment to compliance with the POPI Act and it is our obligation to ensure that the processing of personal information will only be done within the parameters of the law.

The terms of this privacy statement are subject to any mandatory provisions of relevant legislation. This privacy notice needs to be read together with the PAIA manual which can be accessed via <https://www.jectech.co.za/> as well as the POPI Act and its regulations, where applicable.

2. Definitions

Please keep the following terminology in mind as they will be used interchangeably throughout this Privacy Policy.

POPIA	Protection of Personal Information Act 4 of 2013.
PAIA	Promotion of Access to Information Act 2 of 2000.
Data Subject	The person(s) who own(s) the Personal Information, which is to be processed by the Operator, on behalf of the Company, in terms of this Agreement.
Operator	The person processing personal information for a responsible party (the Company) in terms of the mandate, without coming under the direct authority of the Company.
Responsible Party	A public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information. In the context of this privacy policy, JEC Technologies Group is the Responsible Party.
Personal Information	This is information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person

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	Personal information can be used to identify both a natural as well as a juristic person where applicable.
Special Personal Information	This is information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, DNA, sexual life, or criminal behavior of a data subject.
Information Officer	The person is responsible for encouraging responsible persons to comply with the principles and conditions for the lawful processing of personal information and assisting data subjects to make requests and lodging complaints.
Deputy Information Officer	The deputy information officer of a public body or private body is an employee of that public body or private body to whom the Information Officer has delegated their powers and duties in terms of POPIA, read together with the provisions of PAIA.
Direct Marketing	Direct marketing means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of – (a) promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or (b) requesting the data subject to make a donation of any kind for any reason.

3. About The Company

In our capacity as a managed service provider, JEC Technologies Group helps clients resolve critical issues through managed services, cloud migration, and IT optimization. By providing a range of simplified services and solutions, we enable organizations to facilitate change, achieve their vision, and maximize performance by adding quantifiable value that makes us successful.

4. The Eight Conditions For Lawful Processing

Data management principles are woven directly into POPIA as it sets out eight conditions that businesses must comply with when processing the personal information of data subjects.

These eight conditions are the foundational principles of POPIA that, when complied with, ensure that a data subject’s personal information is being processed lawfully and transparently.

JEC Technologies Group strives to adhere to the eight principles outlined in POPIA, as outlined below. Additionally, there are **rules** developed for in-house purposes to ensure that the eight conditions are ceaselessly complied with. The rules are equally set out below:

<u>Accountability</u>	The Group seeks to ensure and is responsible for ensuring that the conditions for lawful processing are met.
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- 1) The Group will seek to give effect to all eight conditions contained within the Act to ensure and maintain compliance with the Act.
- 2) The Group will perform impact assessments to determine our risk profile which will aid in ensuring ceaseless compliance with the Act.
- 3) The Group will appoint Information Officers/Deputy Information Officers who will be tasked with ensuring compliance with POPIA when the reasonableness test is applied to how companies acted in their quest for compliance.
- 4) The Group will determine the purpose of and means for the processing of personal information.
- 5) The Group will be responsible and maintain liability from the time that the information is processed to the time of its deletion/de-identification.
- 6) The Group will be responsible for redressing the infringement of a person(s) or organisation(s) right to have their personal information protected.

<u>Processing Limitation</u>	The Group processes personal information lawfully, minimally, in accordance with the limitations, justification, and objection provisions, and with the data subject's implicit or explicit consent, unless certain exceptions apply.
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- 1) The Group will ensure that personal information is only processed on grounds of the lawful basis of consent after providing notice to the data subject.
- 2) The Group will only collect and process personal information if for legitimate (business and/or regulatory) requirements and the information collected or processed will be linked to the purpose to which the data subject has consented.
- 3) The Group will audit the personal information it processes and test the purpose against minimality to ensure that no unnecessary pieces of personal information are collected and processed.

<u>Purpose Specification</u>	The Group processes personal information for a specific and consented purpose and adheres to the retention and restriction of records provisions stipulated within POPIA.
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- 1) The Group will only collect personal information for a specific purpose.
- 2) The Group will define the different reasons for which personal information will be processed and also make sure that these reasons tie in with the general business activities.

- 3) The Group then has a duty to bring to the attention of the data subject, these defined purposes for processing and will be stipulated on the notice and consent forms for Suppliers, Customers, and Employees.
- 4) The Group will always keep the personal information of a Data subject for the period required by law and where it needs to do so in connection with legal action or an investigation in which it is involved.
- 5) Otherwise, information of a Data subject will only be kept until its purpose has been fulfilled and then the information will be removed.

Further Processing Limitation	The Group seeks to ensure that the further processing of information is compatible with the initial purpose of collection.
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- 1) The Group will not collect personal information for a specifically defined purpose, and then use it for a purpose that is not linked to the original purpose at all.
- 2) The Group may share the Personal Information of a Data subject with certain third parties or “Operators”. There are contractual agreements in place to govern third-party usage and processing and to ensure the protection of personal information. We may share personal information with the following third parties:
 - Agents and suppliers, including those who provide technology services such as data analytics, hosting, and technical support;
 - Professional advisors, auditors, and business partners;
 - Regulators, governments, and law enforcement authorities; and
 - Other third parties in connection with the development and enhancement of our business model.

The Group may be required to provide personal information in the above-mentioned instances where necessary to avoid prejudice to the maintenance of the law or in matters that pertain to the interests of national security.

Thus, the data subject can be assured that if a third party is mandated to process their personal information, we’ll share it with them only if:

- You’ve already consented to the disclosure of this information to that third party;
 - We have a legal or contractual duty to give the information to that third party;
 - For risk or fraud prevention purposes, or both; and
 - For any of the purposes set out in this privacy statement.
- 3) In the case where information must be processed for a purpose outside of the original purpose stipulated in the notice and consent form, the data subject will be approached for additional consent.

<u>Information Quality</u>	The Group strives to fulfill its duty to take all reasonable steps to ensure that all personal information is complete, accurate, not misleading, and updated on a regular basis.
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- 1) The Group will always attempt to gather personal information directly from the data subject.
- 2) Data subjects should also be responsible and could be requested to advise responsible parties of a change in details where applicable.
- 3) The Group will ensure that data subjects have access to processes in terms whereof current information can be updated where required.

<u>Openness</u>	The Group maintains the documentation of all processing operations under its responsibility and takes reasonably practicable steps to ensure that the data subject is aware of all pertinent pieces of information.
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- 1) The Group will be open about the collection of personal information by notifying the Regulator of the fact that we are going to process personal information. This is done via registration with the Information Regulator.
- 2) In the case of a breach of any kind, the information officer will notify the Regulator and all Data Subjects impacted by the breach. Additionally, the incident will be investigated internally and a mitigation plan will be formulated to mitigate the risk and impact of such a breach.
- 3) The Group will maintain the documentation of all processing operations under its responsibility.
- 4) The Group has ensured openness by developing a PAIA manual to include all of the required and pertinent information.
- 5) A copy of the PAIA manual will be kept at each office, as well as the website. Deputy Information Officers will respond to access requests within the timeframe and manner stipulated in the PAIA Manual using the access request form (Form C). Documentation of access requests will be kept up to the point at which access is granted, if access is denied, it will be kept for the period of the appeal process.

<u>Security Safeguards</u>	The Group recognises its responsibility to protect personal information and the data subject must be informed of the means by which the responsible party plans on protecting their personal information.
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- 1) The Group will:
 - (i) Secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organizational measures;
 - (ii) In terms of a written contract, ensure that the operator, which processes personal information for The Group establishes and maintains security measures; and
 - (iii) As soon as reasonably possible after the discovery of a compromise, notify the Information Regulator and the data subject.

- 2) Internal processors of personal information will be limited in terms of what personal information they may access based on what they require to fulfill their duties/roles as processors.

Data Subject Participation	The Group will allow a data subject to the access and correct their personal information. The Group also acknowledges that we may also be required to correct, delete, or destroy personal information.
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- 1) The Group will ensure practical and accessible transparency for data subjects in the processing of personal information.
- 2) The Group will allow a data subject to have a say in the processing of the personal information in the possession or under the control of such a responsible party.
- 3) The Group recognises its responsibility to maintain up-to-date information registers and implement suitable controls so that it is able to easily:
 - (i) Identify what personal information is in its possession or under its control;
 - (ii) Identify to whom does that personal information relate; and
 - (iii) Update such personal information.

This condition must be understood in conjunction with the Promotion of Access to Information Act and all the relevant provisions. Please refer to the PAIA manual which can be accessed via <https://www.jectech.co.za/>.

- 4) The Notice and Consent forms will make clear to the data subject the consequences of withdrawing or denying consent.
- 5) Data subjects will be able to practice their rights with regard to requesting the deletion of personal information, this will apply to the information held in various systems where it is being processed, however, this will not apply to records that are required to be kept by other pieces of pertinent legislation.

5. The Information We Collect

The purpose of The JEC Tech’s Privacy Policy is to give effect to the POPI Act and to provide clarity on:

- The personal information collection and the basis thereof.
- The manner in which the personal information is used and protected.
- How long the personal information will be retained.
- Your rights as the data subject regarding your personal information.
- The procedural steps to be followed if you deny the processing of your personal information.

In the ordinary course of our operations, we may collect the following pieces of personal information and then process it for the following reasons for the following different classes of data subjects:

a) Customers

Personal Information Collected	Purpose of Collection
Name Cell phone Number Email Address Banking Details Company Details (Name; Registration Number; VAT Number; Billing Contact Details	<ul style="list-style-type: none"> • Invoicing the customer • Communication purposes • Credit checks • Statements • Account Queries • Debit Orders

b) Employees

Personal Information Collected	Purpose of Collection
Name Cell phone Number Race Gender ID Number Residential Address Date of Birth Age Marital Status Disability Banking Details Biometric Info Tax Number Medical Aid Information Contract Data Payment Data	<ul style="list-style-type: none"> • Information is required to load employees on our payroll • To contact employees / In case of Emergency • For disability claims • For maternity leave purposes • For compliance, if employees are driving company vehicles • For proof of address purposes • To enable us to make payments to the staff (payroll) • To substantiate boarding of employees or to assess medical leave • It forms part of the engagement checks performed • It forms part of employee file history if required • For PAYE purposes • To pay contributions to the medical aid • To pay contributions to the benefits plan providers • Medical aid deduction calculation & nomination of beneficiaries forms for death benefits

a) Suppliers

Personal Information Collected	Purpose of Collection
Company Details Billing contacts Billing details	<ul style="list-style-type: none"> • To load suppliers on our financial system • To contact the supplier • To make payment to the supplier • To ensure the supplier is a registered VAT vendor • For record-keeping purposes

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In Addition to the above-mentioned information, we may also collect the following information:

1. Business and personal information

This includes basic identification and contact information, such as name and contact details, and also includes all information given to us in the course of business, such as information provided by our clients. We undertake to preserve the confidentiality of the information and the terms of our relationship. It is not used for any other purpose. We expect you to reciprocate this policy.

This information is used:

- 1.1. to provide the services which have been requested;
- 1.2. for verifying identity for security purposes;
- 1.3. for marketing our services and products;
- 1.4. the information which does not identify any individual may be used in a general way by us or third parties, to provide class information, for example relating to demographics or usage of a particular page or service.

We keep the information, which forms part of our business record for a minimum of six years. That is because we may need it in some way to support a claim or defense in court. That is also the period within which our tax collecting authorities may demand to know it.

2. Marketplace information

When we obtain information from data subjects, specifically to enable data subjects to buy a service offered on our website by another entity, we assume that in providing us with information, you are also implying consent to pass it to the relevant party. This basis for processing is known as the “legitimate interest” basis for processing.

3. Your domain name and email address

This information is recognised by our servers and the pages that you visit are recorded. We shall not under any circumstances, divulge email addresses to any person who is not an employee or contractor of JEC Technologies and who does not need to know, either generally or specifically.

This information is used:

- 3.1. for correspondence;
- 3.2. in a collective way not referable to any particular individual, for the purpose of quality control and improvement of our site;
- 3.3. to send news about the services to which the data subject has signed up;
- 3.4. to notify about other services or services of sister websites.

4. Information you post on our website

Information sent to us by posting to a forum or blog or in an advertisement is stored on our servers. We do not specifically use that information except to allow it to be read, however, you will see in our terms and conditions that we reserve a right to use it in any way we decide.

5. Website usage information

We may use software embedded in our website (such as JavaScript) to collect information about pages you view and how you have reached them, what you do when you visit a page,

the length of time you remain on the page, and how we perform in providing content to you. [We do not presently associate such information with an identifiable person]

6. Financial information relating to your credit cards

This information is never taken by us either through our website or otherwise. At the point of payment, you are transferred to a secure page on the website of Sage Pay, PayPal, ConnectWise, Xero, or some other reputable payment service provider. That page may be dressed in our "livery", but it is not controlled by us. Our staff and contractors never have access to it.

7. Note on padlock symbols and other trust marks

Many companies offer certification and an icon or other small graphic to prove to site visitors that the site is safe. Some certify a high level of safety. Others are more concerned to take our money than to provide a useful service.

8. Financial information relating to your credit cards

We may keep your financial information to provide you with a better shopping experience the next time you visit us and to prevent fraud.

We use Secure Sockets Layer (SSL) certificates to verify our identity in your browser and to encrypt any data you give us when you buy, including financial information such as credit or debit card numbers. Our SSL certificate encryption level is 128-bit/256-bit. Whenever we ask for financial information, you can check that SSL is being used by looking for a closed padlock symbol or other trust marks in your browser URL bar or toolbar.

We take the following measures to protect your financial information:

- 8.1. We keep your financial information encrypted on our servers.
- 8.2. We do not keep all your data, so as to prevent the possibility of our duplicating a transaction without new instruction from you.
- 8.3. Access to your information is restricted to authorised staff only.
- 8.4. We automatically delete your information [after X days OR when the card expires].
- 8.5. If we ask you questions about your financial information, we shall show partial detail [the first four OR the last four digits of the debit or credit card number], only enough to identify the card(s) to which we refer.

AND/OR

9. Financial information about your direct debit

When you have agreed to set up a direct debit arrangement, the information you have given to us is passed to our own bank First National Bank for processing according to our instructions. We do not keep a copy. We are registered under the direct debit guarantee scheme. (This provides for the customer's bank to refund disputed payments without question, pending further investigation. Direct debits can only be set up for payments to beneficiaries that are approved "originators" of direct debits. In order to be approved, these beneficiaries are subjected to careful vetting procedures. Once approved, they are required to give indemnity guarantees through their banks.)

10. Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

11. Third-party advertising

Third parties may advertise on our website. In doing so, those parties, their agents, or other companies working for them may use technology that automatically collects your IP address when they send an advertisement that appears on our site to your browser. They may also use other technology such as cookies or JavaScript to personalise the content of and measure the performance of their adverts. We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

12. Third party content

Our website is a publishing medium in that anyone may register and then publish information about himself or some other person. We do not moderate or control what is posted. If you complain about any of the content on our website, we shall investigate your complaint. If we feel it may be justified, we shall remove it while we investigate. Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content which offends you. If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

13. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we do receive data which is indirectly made up from your personal information, from software services such as Google Analytics and others. No such information is identifiable to you.

14. Content you provide to us with a view to being used by the third party

If you provide information to us with a view to it being read, copied, downloaded, or used by other people, we accept no responsibility for what that third party may do with it. It is up to you to satisfy yourself about the privacy level of every person who might see your information. If it is available to the World, you have no control whatsoever as to how it is used.

15. Cookies

Cookies are small text files that are placed on your computer's hard drive through your web browser when you visit any website. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Like all other users of cookies, we may request the return of information from your computer when your browser requests a web page from our server. Cookies enable our web server to identify you to us and to track your actions and the pages you visit while you use our website. The cookies we use may last for a single visit to our site (they are deleted from your computer when you close your browser) or may remain on your computer until you delete them or until a defined period has passed.

Although your browser software enables you to disable cookies, we recommend that you

allow the use of cookies in order to take advantage of the features of our website that rely on their use. If you prevent their use, you will not be able to use all the functionality of our website. Here are the ways we use cookies:

15.1. to record whether you have accepted the use of cookies on our website. This is solely to comply with the law. If you have chosen not to accept cookies, we will not use cookies for your visit, but unfortunately, our site will not work well for you.

15.2. to allow essential parts of our website to operate for you.

15.3. to operate our content management system.

15.4. to operate the online notification form - the form that you use to contact us for any reason. This cookie is set on your arrival at our website and deleted when you close your browser.

15.5. to enhance security on our contact form. It is set for use only through the contact form. This cookie is deleted when you close your browser.

15.6. to collect information about how visitors use our site. We use the information to improve your experience of our site and enable us to increase sales. This cookie collects information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from, and the pages they visited.

15.7. to record that a user has viewed a webcast. It collects information in an anonymous form. This cookie expires when you close your browser.

15.8. to record your activity during a webcast. An example is as to whether you have asked a question or provided an opinion by ticking a box. This information is retained so that we can serve your information to you when you return to the site. This cookie will record an anonymous ID for each user, but it will not use the information for any other purpose. This cookie will last for [three] months when it will delete automatically.

15.9. to store your personal information so that you do not have to provide it afresh when you visit the site next time. This cookie will last for [90] days.

15.10. to enable you to watch videos we have placed on YouTube. YouTube will not store personally identifiable cookie information when you use YouTube's privacy-enhanced mode.

16. Calling our helpline

When you call our helpline, we collect Calling Line Identification (CLI) information. We use this information to help improve the efficiency and effectiveness of our helpline.

17. Sending a message to our support system

When you send a message, we collect the data you have given to us in that message in order to obtain confirmation that you are entitled to receive the information and to provide you with the information you need. We record your request and our reply in order to increase the efficiency of our business/organisation. We do not keep any personally identifiable information associated with your messages, such as your name or email address.

18. Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter of our sole discretion as to whether we do give information, and, if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

19. Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date. If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

20. Marketing information

With your permission we pass your email address and name to selected associates whom we consider may provide services or products you would find useful. You may opt out of this service at any time by instructing us at the [URL](#).

21. Remarketing

We may use remarketing from time to time. This involves Google or some other supplier placing a tag or marker on your website in order to be able to serve you an advert for our products/services when you visit some other website.

22. Affiliate information

This is information given to us by you in your capacity as an affiliate of ours or a customer or client of ours. Such information is retained for business use only. We undertake to preserve the confidentiality of the information and the terms of our relationship. It is not used for any other purpose. We expect any affiliate to agree to reciprocate this policy. As an exception to this, we have the right to disclose your first name and URL of your affiliate connection to other affiliates and any other person or organisation, on and off-site. The reason is sole to enable us to mention winners and others whose performance as an affiliate is in some way outstanding.

23. Use of the site by children

We do not market to children, nor do we sell products or services for purchase by children. We do sell products and services for end use by children, but for purchase by adults. If you are under 18, you may use our site only with consent from a parent or guardian.

24. Disclosure to Government and their agencies

We are subject to the law like everyone else. We may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

25. Compliance with the law

This confidentiality policy has been compiled so as to comply with the law of every jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your country, we would like to hear from you, but ultimately it is your choice as to whether you wish to use our website.

26. Review or update personally identifiable information

At any time, you may review or update the personally identifiable information that we hold about you, by contacting us at the address below. To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your information.

27. Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us via **email**. To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your information.

28. Data may be “processed” outside South Africa

Our websites are hosted in South Africa. We also use outsourced services in countries outside South Africa from time to time in other aspects of our business. Specifically, some technical center resources are based in India and the United Kingdom. Accordingly, data obtained within South Africa may be “processed” outside South Africa, and data obtained in any other country may be processed within or outside that country.

The information we use is collected directly from where you provide us with your personal details. We will keep your personal information confidential.

Where applicable, we will inform you of what information you are required to provide to us and what information is optional.

6. How We Use The Information We Collect

We will use your personal information only for the purposes for which it was collected and to which the data subject has provided consent. In addition, where necessary your information may be retained for legal or research purposes.

JEC Technologies Group may use the personal information of a Data subject:

- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- To ensure that The Group has up-to-date contact information for the Data Subject, where applicable;
- To market communication about new and improved products and services;
- For the detection as well as the prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- To comply with applicable laws, regulations, and guidance;
- To comply with demands or requests made by regulators, governments, courts, and law enforcement authorities.

The data subject may withdraw consent to the usage of personal information.

If a Data subject objects to the processing of their Personal information, or if they have provided their consent to processing and then subsequently choose to withdraw it, **JEC Technologies Group** will comply with the request in accordance with its legal obligations. **The**

Group's legal obligations in respect of the information to which consent has been withdrawn shall therefore cease to exist.

When we delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers to ensure that records are destroyed/de-identified in a way that prevents them from being reconstructed.

JEC Technologies Group, in its day-to-day operations, may potentially use certain digital communication platforms to communicate with you and amongst personnel within The Group in order for us to provide you with our product and service offerings, these platforms could include:

- Company websites
- Email
- Telephone
- Linked In
- WhatsApp

If an employee is using a digital platform of any kind to conduct the business of The Group, it will be ensured that these activities are POPIA compliant. Resultantly, we will not share any personal information with any third party for purposes that cannot be linked to the purpose to which the data subject has consented unless this information is publicly made available.

7. Information Security

The Group is legally obligated to provide adequate protection for the personal information we hold and to prevent unauthorized access and use of personal information.

We continue to review the collection of information, storage of information, as well as processing systems, including physical security measures, to prevent unauthorized access to your personal information.

When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that the personal information that we remain responsible for, is kept secure.

We ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obligated to by law as third-party usage is governed by contractual confidentiality obligations. There are contractual agreements in place to regulate any third-party processing of the personal information of the data subject.

Consent will be obtained before third-party usage of personal information will occur.

When the data subject's personal information is provided to a third party, the details of the third party and the manner in which they plan to use the personal information will be indicated. The category of information provided to third-party users will be indicated as well.

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8. Your Rights: Access To And Correction Of Your Personal Information

The Right to Access

The data subject has the right to access the personal information we hold about them.

The Right to Alteration, Correction, and Amendment of Data

The data subject has the right to ask for the update, correction, or deletion of their personal information. This right is also termed as “the right to be forgotten”. We will only keep your personal information for whatever period we are bound to do so by law.

The Right to Complain

You have a right to complain about our use of your information. If we do not respond to your satisfaction, then your complaint may be directed to the Regulator’s Office.

Direct Marketing

POPIA prohibits direct marketing via any kind of electronic communication unless the data subject has consented, or if similar products or services have previously been sold to the data subject.

A data subject can only be approached once to obtain such consent. Once such consent is refused, it is refused forever. The Group recognises this right in its process of direct marketing.

The Right to Withdraw Consent and Consequences Therein

The data subject or competent person may withdraw him, her, or her consent at any time provided that the lawfulness of the processing of personal information before such withdrawal or the processing of personal information will not be affected.

The Group thus recognises that a data subject (or a parent or guardian of a child) may at any time withdraw his or her consent in situations where consent was given.

In the employment context, the withdrawal of consent by an employee may however impede an employer’s ability to carry out legitimate functions which require the processing of an employee’s personal information. In the context of service delivery, the withdrawal of consent could impede the fulfillment of the Group’s obligation to the customer.

Processing that is not based upon consent remains lawful if based upon one of the other grounds listed above.

9. Third Party Service Providers

Google LLC, Microsoft Corporation, and ConnectWise LLC are all third-party service providers that The Group utilises. This means that in some instances, depending on our relationship with you, your information may be shared with these third parties.

Your information may be shared with these third parties only in the case where it is required to fulfill the agreement and/or services that we provide to you. Your information may therefore in some instances be shared across other countries where our service providers reside. This is done in accordance with the Protection of Personal Information Act as these companies are regulated by similarly stringent data protection legislation.

10. Contact Details – Deputy Information Officer

The responsibility for the administration of, and compliance with the Acts, has been delegated to the Deputy Information Officers of JEC Technology Group. Requests according to the provisions of the Acts should be directed as follows:

JEC Technologies Group (PTY) LTD

Deputy Information Officer: Antwanette Currie

E-mail address: Antwanette.Currie@jectech.co.za

Postal address: 12 Somerset Office Park, 5 Libertas Road, Bryanston, Sandton, 2191

Street address: 12 Somerset Office Park, 5 Libertas Road, Bryanston, Sandton, 2191

Business phone: 010 880-0070