



PRIVACY POLICY & MANUAL

In terms of the Protection of Personal Information Act 4 of 2013 (POPIA)

1. DEFINITIONS

1.1 “POPIA” THE PROTECTION OF PERSONAL INFORMATION ACT. The POPI Act is a new all-inclusive piece of legislation, a privacy law, that safeguards the integrity and sensitivity of private information. Companies are required to carefully manage the data capture and storage process of Personal Information.

1.2 The definition of Personal Information as set out in the POPI Act is as follows:

1.2.1 “personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, color, sexual orientation, age, physical or 5 mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone 10 number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private 15 or confidential nature or further correspondence that would reveal the contents of the original correspondence;



- the views or opinions of another individual about the person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information 20 about the person;

2. PURPOSE

- 2.1 Coetzee Safety Consultants (Pty) Ltd respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to set out how Coetzee Safety Consultants (Pty) Ltd collect, use, store and protect personal information as set out in the Protection of Personal Information Act 4 of 2013 (POPIA).
- 2.2 POPIA gives effect to the constitutional right to privacy, regulates the manner in which personal information may be processed and provides rights and remedies to protect personal information.
- 2.3 The manner in which Coetzee Safety Consultants (Pty) Ltd process personal information is directly aligned to its mandate and for the purpose of dispute resolution. Coetzee Safety Consultants (Pty) Ltd mandate is set out in the Terms and Conditions which can be found on www.coetzeesafety.co.za.
- 2.4 This Policy was compiled and developed after a full assessment on the status of the information, clients and data held by Coetzee Safety Consultants (Pty) Ltd was completed.
- 2.5 Coetzee Safety Consultants (Pty) Ltd bring to your attention that the Privacy Policy addresses the provisions of the Protection of Personal Information Act.

3. WHAT PERSONAL INFORMATION DO COETZEE SAFETY CONSULTANTS (PTY) LTD COLLECT?

- 3.1 The personal information that Coetzee Safety Consultants (Pty) Ltd collect, will include, but is not limited to:



- 3.1.1 Name, surname, company name, company registration number, email address, physical or postal address, telephone number, cellular number, ID number.
- 3.1.2 Data which you may upload on Coetzee Safety Consultants (Pty) Ltd system.
- 3.1.3 Educational information such as CV's, certificates, to name a few.
- 3.1.4 As per legislative requirements, Coetzee Safety Consultants (Pty) Ltd will collect medical fitness certificates and documents from time to time.
- 3.1.5 When you apply to become a client, and during the course of dealings with you, Coetzee Safety Consultants (Pty) Ltd will collect information about you. Whether this collection is mandatory or voluntary, will depend on the reason why it is collected. For example, should you wish to become a client, certain mandatory information will be required to be able complete the services as per the agreement and within the scope of the prescribed legislative requirements. Should you fail to provide, or not be willing to disclose, such information Coetzee Safety Consultants (Pty) Ltd will not be able to complete the services to fulfill the agreement as certain information is essential to complete the scope of work.

4. WHERE COETZEE SAFETY CONSULTANTS (PTY) LTD GET YOUR PERSONAL INFORMATION FROM

- 4.1 Coetzee Safety Consultants (Pty) Ltd typically collect the personal information directly from you as part of our client service process when you complete the service level agreement and provide proof of your identity.
- 4.2 Additionally, Coetzee Safety Consultants (Pty) Ltd collect personal information from you when you correspond with us (whether by telephone, e-mail, or through the CSC Enterprises website) or complete a request for a service. The nature of our relationship with you will determine the kind of personal information Coetzee Safety Consultants (Pty) Ltd might ask for.



4.3 Coetzee Safety Consultants (Pty) Ltd will continue to collect additional personal information that Coetzee Safety Consultants (Pty) Ltd learn about you during the course of providing our services.

5. WHAT DO COETZEE SAFETY CONSULTANTS (PTY) LTD DO WITH YOUR PERSONAL INFORMATION?

- 5.1 Coetzee Safety Consultants (Pty) Ltd use your personal information to provide you with our services in supplying, but not limited to, comprehensive safety solutions in Health and Safety to both the construction and industrial industries. Furthermore, to assist clients with the complex array of Health and Safety requirements, legislation, ensuring compliance and reducing the potential for enforcement action or civil claims.
- 5.2 Coetzee Safety Consultants (Pty) Ltd will not share your personal information other than for the purpose for which it was collected.
- 5.3 Coetzee Safety Consultants (Pty) Ltd will not use your personal information for a purpose that you are not aware of or that you have not given us consent for.
- 5.4 Information will be used in accordance with the governing regulations in terms of the Terms and Conditions to comply with our legal and regulatory requirements.
- 5.5 Coetzee Safety Consultants (Pty) Ltd mainly use the personal information Coetzee Safety Consultants (Pty) Ltd hold about you where it is necessary to perform the contract with you and/or to enable them to comply with legal obligations. Your personal information will also be used when it is in the legitimate interest of Coetzee Safety Consultants (Pty) Ltd which is when a business or commercial reason exist to use your information. The legitimate interest must however also be in your best interest. Each of these categories is a legal basis that allows Coetzee Safety Consultants (Pty) Ltd to process your information under data protection legislation. Relevant information is provided below indicating the purposes for processing your personal information.



5.6 As to the above, the disclosure of information to third parties with a legitimate interest, will only apply if the third party, also acts in accordance with the POPIA regulations and can guarantee the protection of the information. Disclosure of information to third parties will only transpire should it be in the best interest of Coetzee Safety Consultants (Pty) Ltd's rights, legitimate reasons and per proper direction from an authority in power or legislative provision.

6. ACCURACY AND UPDATING OF INFORMATION

- 6.1 Coetzee Safety Consultants (Pty) Ltd will keep your personal information as up-to-date and as accurate as possible.
- 6.2 Coetzee Safety Consultants (Pty) Ltd may request you from time to time to update your information.
- 6.3 You can update and/or review your by emailing or by telephoning us.
- 6.4 Only you may update your own personal data.
- 6.5 To better protect you and safeguard your information, Coetzee Safety Consultants (Pty) Ltd will verify your identity before granting you access to your information and/or making changes to your personal information.

7. RETENTION OF PERSONAL INFORMATION

- 7.1 Coetzee Safety Consultants (Pty) Ltd keep personal information between 5-10 years as prescribed by the legislation and regulations governing their business, and as amended from time to time, for the proposes of the services being provided.
- 7.2 Take notice that specified information will be kept for a longer period if prescribed by legislation.



8. HOW DO COETZEE SAFETY CONSULTANTS (PTY) LTD MAKE SURE THAT YOUR PERSONAL INFORMATION IS SECURE?

- 8.1 Only authorized appointed personnel who need to know will have access to your personal information.
- 8.2 Coetzee Safety Consultants (Pty) Ltd have security measures in place to prevent unauthorized or unlawful processing of personal information or access to personal information, including accidental loss, destruction, or damage to personal information data.
- 8.3 Active measures are in place for the safeguard of personal information held in electronic mediums or servers.

9. FURTHER PROCESSING OF PERSONAL INFORMATION

- 9.1 Your personal information will not be processed further unless required by law.

10. WHAT ARE YOUR RIGHTS?

- 10.1 You have the right to access, amend, rectify, object to the processing of your information and request the discarding of your information at any time.
- 10.2 You have the right to be informed about our processing of your personal information; have inaccurate/incomplete personal information corrected/completed; object to the processing of your personal information; restrict the processing of your personal information; have your personal information erased; request access to your personal information and to obtain information about how Coetzee Safety Consultants (Pty) Ltd process it; move, copy or transfer your personal information digitally; object to automated decision making, such as profiling.
- 10.3 You may do so by contacting us telephonically on (021) 820 7060, or by email on info@coetzeesafety.co.za.



10.4 If you feel that Coetzee Safety Consultants (Pty) Ltd have not protected your personal information and compromised your right to privacy, then you may approach our information officer by email on vince@cscenterprises.co.za and follow the prescribed process.

11 DEEMED ACCEPTANCE OF THE POLICY

11.1 By providing us with your personal information, you are deemed to have read, understood, accepted, and agreed to be bound to all the terms of this policy.

12 CHANGES TO THE POLICY

12.1 Coetzee Safety Consultants (Pty) Ltd reserve the right to change the terms of this policy at any time by updating this Coetzee Safety Consultants (Pty) Ltd Privacy Policy. Unless otherwise stated, the current version shall supersede and replace all previous versions of this policy.

13 REVIEW

13.1 The policy will be reviewed annually.

V. HARMSE
DIRECTOR