



## POPIA PRIVACY POLICY



## Table of Contents

1.	Introduction .....	2
2.	Reasons for processing personal information .....	3
3.	Business activities for which personal information is processed .....	3
4.	Sharing or transfer of personal information.....	3
4.1.	Cross border .....	3
4.2.	Third party providers/operators .....	3
5.	Information security .....	4
6.	Retention of personal information .....	4
7.	Your rights: access to information.....	4
8.	Amendments to your information.....	4
9.	Cookie policy .....	4
10.	How to contact us.....	4

## 1. Introduction

Respecting and protecting your privacy and Personal Information as defined in Protection of Personal Information Act no 4 of 2013 (“POPIA”), is very important to Paycorp Investments Proprietary Limited (“Paycorp”). It is also a Constitutional right and good business practice requirement which we take very seriously.

This policy is applicable to, and followed by, Paycorp and its subsidiaries and divisions (“Paycorp Entities”). This policy governs the relationship between you and the specific Paycorp Entity with which you have signed a contract or have otherwise provided personal information to.

This privacy policy encompasses the minimum required from each Paycorp Entity. The Privacy Policies applies to you, the data subject, only in relation to the particular Paycorp Entity which you have contracted with or have otherwise provided personal information to.

For more detailed information with regards to the processing and protecting of your personal information please contact Paycorp (see section 9 below for contact details).

In the paragraphs which follow any reference made to “us”, “we” or “our” is a reference to ONLY the specific Paycorp Entity with which you have signed a contract or have otherwise provided Personal Information to and not to all Paycorp Entities.

In line with the 8 Conditions for Lawful Procession of Personal Information as set out in POPIA , we:

- accept joint responsibility and accountability with you to responsibly manage and protect your Personal Information when providing our services and solutions to you;
- undertake to collect and process only such Personal Information which is necessary given the purpose for which it is processed and to assist you with your required solutions, conclude the necessarily related agreements and consider the legitimate legal interests of everyone concerned, as required by the Act. We will at all times respect your right to withdraw your consent for the processing of your Personal Information;
- undertake not to share or further process your Personal Information with anyone or for any reason not required in order to assist you in terms of the contract in place with us, legislation or regulations;
- undertake to implement reasonably practicable steps to ensure that information is complete, accurate, not misleading and, where necessary, is updated;
- undertake to be open and transparent on the nature, extent and reasons for processing Personal Information;
- undertake to safeguard and protect your Personal Information in our possession; and
- undertake to freely confirm what Personal Information we hold of you, to update and rectify the Personal Information upon request and to keep it for no longer than required.

By providing us with your Personal Information, you agree to this Policy and authorise us to process such information as set out herein and you authorise the specific Paycorp Entity with which you have signed a contract and any associated entities or third parties (where applicable) for the purposes set out herein.

We will not use your Personal Information for any other purpose than that set out in this Policy, and we will take the necessary steps to secure the integrity and confidentiality of Personal Information in our possession and under our control by taking appropriate and reasonable measures to prevent loss of, damage to or unauthorised destruction, and the unlawful access to, or processing of Personal Information.

## 2. Reasons for processing personal information

We, who provide or assist you with the solutions you required (if any), need to collect, use and keep your Personal Information as prescribed by relevant legislation and regulations and for reasons such as:

- to provide all relevant services in accordance with your mandate to us as set out in the contract and to maintain our relationship;
- to respond to your queries;
- to confirm and verify your identity or to verify that you are an authorised user for security purposes;
- to comply with all legislative or regulatory requirements related to services provided to you by us;
- to fulfil our contractual obligations to you;
- for any other operational purposes required to assist you with the solutions you require;
- to comply with our legal obligations to you, for example health and safety obligations while you are on any of our premises, or to a third party; and
- in connection with possible requirements by the Information Regulator or other Government agencies allowed by law, legal proceedings, or court rulings.

## 3. Business activities for which personal information is processed

- Recruitment and employment purposes.
- Providing services as per client contract.
- Administering, managing and developing our businesses and services.
- Security, quality and risk management activities.
- Complying with any requirement of law, regulation or a professional body of which we are a member.

## 4. Sharing or transfer of personal information

Our employees will have access to your Personal Information to administer and manage our services and internal business processes. In general, we do not share your Personal Information with third parties (other than service providers acting on our behalf) unless we have a lawful basis for doing so.

### 4.1. Cross border

We may need to share Personal Information outside of South Africa (in terms of POPIA) or the European Economic Area (in terms of GDPR) for purposes as set out in this Privacy Policy Statement. This will be done in very limited circumstances and in strict adherence of all requirements of POPIA and other relevant legislation.

### 4.2. Third party providers/operators

We may need to share your Personal Information and/or utilise software or online platforms to enter and process your information for business management purposes. This will only be done in strict adherence to the requirements of POPIA. We also have agreements in place to ensure that they comply with the privacy requirements as required by POPIA. We may also disclose your Personal Information:

- where we have a duty or a right to disclose in terms of legislation, regulations or industry codes;
- where we believe it is necessary to protect our rights;
- when explicitly requested by you;
- with professional advisers, for example, law firms, as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our business. Personal Information may be shared with these advisers as necessary in connection with the services they have been engaged to provide.

- to law enforcement, regulatory and other government agencies and to professional bodies, as required by and/or in accordance with applicable law or regulation. We may also review and use your Personal Information to determine whether disclosure is required or permitted.

## **5. Information security**

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use thereof. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your Personal Information remains secure.

Generally accepted standards of technology and operational security have been implemented to protect information from loss, misuse, alteration, or destruction. All our employees are trained on information security and are required to keep Personal Information confidential and only authorised persons have access to such information.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we are responsible for, is kept secure.

## **6. Retention of personal information**

We shall only retain and store Personal Information for the period which the data is required to serve its primary purpose or a legitimate interest or for the period required to comply with an applicable legal requirement, whichever is longer.

## **7. Your rights: access to information**

You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us via the numbers/addresses provided in paragraph 10 or on our website and specify what information you require. We will need proof of authorisation or a copy of your ID document to confirm your identity before providing details of your personal information. Please note that any such access request may be subject to a payment of a legally allowable fee.

## **8. Amendments to your information**

You have the right to ask us to update, correct or delete your personal information. We will require proof of identity and/or authority before making changes to personal information we may hold of you. We would appreciate it if you would keep your personal information accurate and up to date.

## **9. Cookie policy**

Cookies help us enhance your experience when using our Site. They also help us understand how visitors use our Site, such as which pages are most popular, so that we can better serve our site users. Therefore, our site uses certain tags, log files and other technologies of which you should be aware. Please see our Cookie Policy to find out more about the cookies we use and how to manage and delete cookies.

## **10. How to contact us**

If you have any queries about this policy, or need further information about our privacy practices, wish to withdraw consent, exercise preferences or access or correct your personal information, please contact us at:

Ext. 17, Sandhavon Office Park, 14 Pongola Cres, Eastgate, Sandton, 2090

Information Officer: Samuel Labuschagne

Telephone: +27 11 555 9283

Email: [saml@atmsolutions.co.za](mailto:saml@atmsolutions.co.za)

Any additional information or concerns can be found and raised with the Information Regulator, but please feel free to contact our Information Officer (as per details provided above) first to discuss any questions or concerns you may have.