



IDOFIN (PTY) LTD (REG: 2019/309080/07)

PRIVACY POLICY

PROTECTION OF PERSONAL INFORMATION NOTICE

(Issued in accordance with Section 5 (a) (i) and 18 of the Protection of Personal Information Act, 4 of 2013 (POPI) and Article 13 of the General Data Protection Regulation (EU) 2016/679 IGDP)

The Protection of Personal Information (POPI) Act requires us to inform you how we process and disclose personal information we obtain from you.

We are committed to protecting your privacy and will ensure that your personal information is used appropriately, transparently and according to applicable law.

This privacy policy applies to all IdoFin (Pty) Ltd's (hereafter 'IdoFin', 'us', 'we') electronic media and governs data collection, storage and usage. By using IdoFin's electronic media, you consent to the data practices described in this policy.

'Personal information' is information which relates to an identified or identifiable natural person or a juristic person, by means of an identifying factor and subject to the applicable data protection laws. The personal information we collect, and process may differ depending on our purpose of collecting and processing your personal information.

What information we collect:

We may collect information from a variety of sources including (but not limited) to the following:

- Directly from you;
- Public databases (where permitted by law);
- The South African Revenue Services (SARS); and
- The Companies and Intellectual Property Commission (CIPC).

IdoFin collects the following categories of personally identifiable information directly from you as well as other sources:

- Personal details: Name, age, date of birth, gender, identity number, registration number, taxation numbers;
- Contact details: Phone number, mobile number, email address, postal address, business address;
- Employment details: Job title, employer name, employee number, medical aid details, retirement annuity and pension fund details, salary figures;

- Economic or financial information: Details of income, financial statements, management reports, investment information, bank statements and taxation certificates from relevant institutions.

This is in order to process any contractual obligations that form part of the tax, compliance and accounting services we render, and to provide you with access to our services and benefits through our preferred providers.

In some instances, without requesting it, we may receive your personal information (including your name and contact details) from a third party. We will notify you of us collecting your personal information as soon as reasonably practicable after it has been collected. If we do not intend on contacting you (or cannot make contact for any reason), we will delete the record of this personal information.

There is also information about your computer hardware and software that is automatically collected by IdoFin. This information can include your IP address, browser type, domain names, access times and referring web addresses. This information is used by IdoFin for the operation of the service, to maintain quality of the service and to provide general statistics regarding use of IdoFin's electronic media.

Please be advised that if you directly disclose personally identifiable information or personally sensitive data through IdoFin's public domain, this information may be collected and used by others.

IdoFin encourages you to review the privacy statements relating to the use of our electronic media you choose to link to, so that you can understand how those media and websites collect, use and share your information. IdoFin is not responsible for the privacy statements or other content on websites outside of IdoFin's website.

How we use your information:

We will use your personal information only for the purposes for which it was collected and agreed to with you. In most cases the legal basis will be one of the following:

- To provide services, to you, as set out in the engagement letter;
- To fulfil our contractual obligations to you,
- To communicate with you and to carry out instructions and requests; and
- 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 (eg. To comply with a court order).

We use your personal information to:

- Processing your documentation and related matters in respect of tax, compliance and accounting services offered by IdoFin;
- Comply with obligations in terms of our mandate from you;
- Processing of fee payments to IdoFin;
- Carry out background checks prior to accepting you as a client;
- Confirming and verifying your identity or for security purposes;
- Contact you with questions and other information regarding the services we are providing to you;
- Debt tracing or debt recovery;
- Auditing and record keeping requirements;
- Providing our services to you, to carry out the services you requested and to maintain and constantly improve our relationship with you;

- Providing you with communications in respect of IdoFin and matters that may affect you;
- In connection with and to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

Disclosure of your information:

We will not generally share your personal information with third parties (other than service providers acting on our behalf) unless we have a lawful basis/requirement for doing so. We rely on third-party service providers to perform a variety of services on our behalf such as; record processing, payroll processing, management report preparation, financial statement preparation, financial forecasting, submission of tax returns, data analytics, valuation determinations, IT service providers and payment processing. This may mean that we are required to share your information with these third parties. When we share information in this way, we put in place appropriate measures to make sure that our service providers keep your personal information secure. Under certain circumstances we are required by various laws to collect and share your personal information. These laws include but are not limited to the below and includes their applicable Regulations and Directives etc.:

- Basic Conditions of Employment Act, 75 of 1997
- Income Tax Act, 58 of 1962
- Chartered Accountant Designation (Private) Act, 67 of 1993
- Occupational Health and Safety Act, 85 of 1993
- Companies Act, 71 of 2008
- Compensation of Occupational Injuries and Diseases Act, 130 of 1993
- Skills Development Act, 97 of 1998
- Disaster Management Act, 57 of 2002
- Tax Administration Act, 28 of 2011
- Employment Equity Act, 55 of 1999
- Value Added Tax Act, 89 of 1991

Safeguarding your information:

The POPI Act requires us to adequately protect the personal information we hold and to avoid unauthorised access and use of your personal information. We will continuously review our security controls and processes to ensure that your personal information is secure.

We have implemented generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration, or destruction. All the information we collect is stored electronically. Some features of our security standards and procedures include but are not limited to; user login (passwords), drive access limited to pertinent individuals and stringent password requirements. We require all external contractors to keep personal information confidential. External contractors only have access to the personal information of the specific client they are serving. We will retain your personal information in accordance with our data retention policy which sets out data retention periods required or permitted by applicable law

If we need to transfer your personal information to another country for processing or storage, we will ensure that any party to whom we pass on your personal information, is subject to the same level of protection of personal information as required from us.

Your rights to access and correction of your personal information:

You have the right to access the personal information we hold about you. You also have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before providing details of your personal information or making changes to your personal information.

Your information rights:

- Right to access information: You have the right to request confirmation (and copies) of the personal information we store about you.
- Right to request correction or deletion of personal information: You can request the correction, updating or deletion of your personal information held by us (where permissible by law). Please communicate any such requests in writing to the information officer.
- Right to object the processing of personal information: Unless we are required to process information on a legal basis, you may reject to us processing your information. Please communicate any such objection in writing to the information officer.
- Right to request that we share your personal information: You may request that we share your personal information with third parties in a readable, commonly used format.
- Right to unsubscribe from direct marketing: You have a right to unsubscribe from marketing and news emails you may receive from us.
- Right to withdraw consent: Where you have provided consent to a particular type of processing, you may withdraw such consent in writing to us.
- Right to lodge a complaint to the information regulator: If you feel we have interfered with your right to protection of personal information, you have the right to lodge a complaint in the prescribed manner to the Information Regulator. (Tel: 010 023 5207 email: infoereg@justice.gov.za).

In the event in which you refuse to provide or allow us to collect your personal information, where our purpose for such collection is based on a contractual requirement, legal obligation and/or our legitimate interest, it could hinder our ability to perform our duties and responsibilities in both your and our best interest, which could be to your detriment.

How to contact us:

You can contact us at the number or address listed below and request the information you would like:

- Information Officer: **Wandi van Renen**
- Telephone number: **083 275 4596**
- Address: **1 Honeybush Estate, Welgevonden, Stellenbosch**
- Email address: wandi@idofin.co.za
- Website: www.idofin.co.za

Please note that a request for information may be subject to payment of a predetermined amount.

Changes to this Notice

Please note that we may amend this Notice from time to time. Please check with us or on our website periodically to inform yourself of any changes.