GLOBAL **BUSINESS** SOLUTIONS

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GBS

PRIVACY POLICY



GLOBAL BUSINESS SOLUTIONS

1. Introduction

Global Business Solutions (GBS) is committed to protecting the privacy and security of personal information of our clients, employees, suppliers and other data subjects / stakeholders. This Privacy Policy outlines how we collect, use, disclose, store, retain, transfer, secure and otherwise process personal information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA), the Promotion of Access to Information Act 2 of 2000 (PAIA), the PAIA Regulations, the Electronic Communications and Transactions Act 25 of 2002, the Cybercrimes Act 19 of 2020, applicable labour legislation, professional confidentiality obligations, together with any applicable guidance, notices, regulations, codes of conduct or enforcement notices issued by the Information Regulator from time to time.

2. Scope of Application

This policy applies to all personal information processed by GBS, whether in electronic or non-electronic format. It extends to all employees, clients, suppliers, and other data subjects / stakeholders whose personal information is processed by GBS.

3. Definition

For the purposes of this policy, we use the following definitions:

- **"Personal Information"** means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person.
- **"Processing"** means any operation or activity concerning personal information, including collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use; dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as restriction, degradation, erasure or destruction of information.
- **"Data Subject / stakeholder"** means the person to whom personal information relates.
- **"Responsible Party"** means GBS, as the party who determines the purpose of and means for processing personal information.
- **"Operator"** means a party who processes personal information for GBS in terms of a contract or mandate, without coming under the direct authority of GBS.

4. Information Officer

GBS has appointed an Information Officer responsible for overseeing compliance with this Privacy Policy and relevant legislation. The Information Officer is John Botha, Joint CEO. The Deputy Information Officer is Cynthia Streicher. Requests, complaints and privacy-related correspondence may be directed to the Information Officer and/or Deputy Information Officer using the contact details below in GBS' PAIA Manual.

Information Officer: John Botha
Email: john@globalbusiness.co.za
Phone: 082 457 0000

Deputy Information Officer: Cynthia Streicher
Email: cynthia@globalbusiness.co.za
Phone: 079 767 7677

5. Collection of Personal Information

5.1 We collect personal information directly from data subjects when they:

- Use our services or provide us with services
- Visit our website
- Communicate with us via email, phone, or other channels
- Apply for employment with us
- Engage in related business activities

5.2 We may also collect personal information from third parties where permitted by law.

5.3 The types of personal information we collect may include:

- Name and contact details
- Identification information
- Employment information
- Financial information
- Education information
- Any other information relevant to our services

6. Purpose of Collection and Processing

We collect and process personal information for the following purposes:

- To provide our services

- To communicate with clients and other stakeholders
- For recruitment and employment purposes
- To comply with legal and regulatory requirements
- To improve our services and conduct research
- For marketing purposes, where consent has been obtained
- To transact and run our business in accordance with law and practice

7. Lawful Basis for Processing

We only process personal information where we have a lawful basis to do so. Depending on the circumstances, GBS may rely on consent, contractual necessity, compliance with a legal obligation, protection of a legitimate interest, the proper performance of a public law duty where applicable, or another lawful ground recognised by POPIA. Where special personal information or personal information of children is processed, GBS will only do so where POPIA permits such processing or where another applicable law authorises or requires it. The lawful basis we rely on include:

- Consent of the data subject
- Processing is necessary for the performance of a contract
- Compliance with a legal obligation
- Legitimate interests pursued by GBS or a third party

8. Rights of Data Subjects

Data subjects have the following rights regarding their personal information:

- The right to access their personal information
- The right to request correction of their personal information
- The right to request deletion of their personal information
- The right to object to processing of their personal information
- The right to submit a complaint to the Information Regulator

To exercise these rights, data subjects should contact our Information Officer using the details provided in Section 4. Requests for access to records or personal information will be handled in accordance with POPIA, PAIA, the PAIA Regulations, GBS' PAIA Manual, prescribed forms, applicable fees, prescribed time periods, lawful grounds for refusal, confidentiality obligations and legal privilege. GBS may verify the identity and authority of the requester before processing a request

and will keep appropriate internal records of the request, decision, outcome and any corrective action taken.

9. Security Safeguards

GBS implements appropriate technical and organisational measures to ensure the security and confidentiality of personal information. These measures are intended to secure the integrity, confidentiality and availability of personal information and to prevent loss, damage, unauthorised access, unlawful access, unauthorised processing or unlawful processing. Safeguards may include:-

- role-based access controls
- strong password and authentication controls
- multi-factor authentication
- encryption or secure transmission methods
- secure backups
- anti-virus and anti-malware protection
- patch management
- secure configuration standards
- clean-desk and clear-screen controls
- physical security controls
- secure disposal of paper and electronic records
- incident logging
- periodic access reviews
- confidentiality undertakings
- staff awareness training
- operator and technology provider due diligence, and
- monitoring, investigation and response procedures for security incidents.

If there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, GBS will notify the Information Regulator and affected data subjects as soon as reasonably possible, unless a competent authority determines that notification will impede a criminal investigation. Any notification will contain sufficient information, where available, to allow affected data subjects to take protective measures.

10. Data Retention

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, or as required by law. Personal information may be retained where required or authorised by law, reasonably required for lawful purposes related to GBS' functions or activities, required by contract, required for professional, legal, tax, accounting, employment, trust accounting, compliance or evidentiary purposes, or consented to by the data subject. Personal information that is no longer required will be securely destroyed, deleted or de-identified in a manner that prevents reconstruction in intelligible form.

11. Transfer of Personal Information

GBS may transfer personal information to third parties, including:

- Service providers and operators processing information on our behalf
- Professional advisors and consultants
- Regulatory authorities and government agencies
- Other parties required for the conducting of legitimate business
- Providing data subject information to GBS business partners, including Kirchmanns Inc, Circle and Square, Chris Baker & Associates, Inscape Properties, Joint Prosperity and/or Operators (as contracted) in order for Global Business Solution partners to use the information to market their services to data subjects who are current clients and/ or who have consented as envisaged in the POPI Act.

When transferring personal information, we ensure appropriate safeguards are in place to protect the information. Where personal information is shared with operators, service providers or business partners, GBS will require appropriate written arrangements requiring the recipient to process personal information only with GBS' knowledge or authorisation, maintain confidentiality, implement appropriate security safeguards, notify GBS of any actual or suspected compromise of personal information, assist with data subject requests and regulatory obligations where applicable, and return, delete or securely destroy personal information when the services end, subject to lawful retention requirements.

12. Cross-border Transfers

Where personal information is transferred outside of South Africa, we ensure that the recipient country has adequate data protection laws or that the transfer is subject to appropriate safeguards as required by POPIA. This may include ensuring that the recipient is subject to a law, binding corporate rules or binding agreement providing an adequate level of protection, obtaining the data subject's consent where required, transferring information where necessary for the performance of a contract or pre-contractual measures, or relying on another lawful ground permitted by POPIA. Cross-border transfers should be recorded in GBS' processing register or other appropriate internal compliance record.

13. Direct Marketing

GBS will only use personal information for direct marketing purposes where permitted by law. Direct marketing by electronic communication will be conducted in accordance with POPIA, including section 69. GBS will ensure that unsolicited electronic marketing is sent only where permitted, that consent is obtained where required, that every marketing communication identifies GBS as the sender, and that data subjects are given a clear and practical opportunity to opt out of further marketing communications.

In addition to POPIA, GBS will also comply with the applicable requirements of the Consumer Protection Act 68 of 2008 in relation to direct marketing, including respecting consumers' rights to refuse, block, or opt out of direct marketing communications and ensuring that any direct marketing is conducted lawfully, transparently, and with due regard to applicable consumer preferences and restrictions.

14. Automated Decision Making

GBS does not use personal information for automated decision-making or profiling purposes. If this position changes, GBS will ensure that any automated decision-making is assessed for POPIA compliance, communicated to affected data subjects where required, and implemented with appropriate safeguards.

15. Cookies and Similar Technologies

Our website may use cookies and similar technologies to enhance user experience and collect usage information. Users can control cookie settings through their browser preferences.

16. Children's Privacy

GBS does not knowingly collect or process personal information of children under the age of 18 without the consent of a parent or guardian, except where permitted by law. Where information relating to a child is processed, GBS will take reasonable steps to ensure that the processing is lawful, necessary, limited to the relevant purpose, appropriately secured and handled with due regard to the child's privacy and best interests.

17. Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. This Privacy Policy should be reviewed at least annually and whenever there are material changes to POPIA, PAIA, Information Regulator guidance, GBS' PAIA Manual, GBS' processing activities, technology systems, operators, services, business partners, security risks, incident history, legal obligations or operational requirements.

18. Complaints

If you have any complaints about our processing of personal information, please contact our Information Officer. Complaints may relate to processing, access, correction, deletion, destruction, objection, direct marketing, security safeguards or any other POPIA-related matter. GBS will investigate complaints within a reasonable time, request further information where necessary, consider the complaint in accordance with POPIA, PAIA, the PAIA Manual and any applicable internal policies or procedures, and provide feedback where appropriate. Complaints should be recorded in a complaints register. Data subjects may also lodge a complaint with the Information Regulator and/or approach a competent court where applicable.

eServices: Information Regulator (inforegulator.org.za)

19. Contact Us

For any questions or concerns regarding this Privacy Policy or our data protection practices, please contact our Information Officer using the details provided in Section 4.



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