

Circle & Square Privacy Policy



1. Introduction

Circle and Square (“C&S”) 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, and protect personal information in accordance with the Protection of Personal Information Act (POPIA) and other relevant legislation.

2. Scope of Application

This policy applies to all personal information processed by C&S, 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 C&S.

3. Definitions

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, organization, 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 Circle & Square (C&S), as the party who determines the purpose of and means for processing personal information.
- ❖ "Operator" means a party who processes personal information for C&S in terms of a contract or mandate, without coming under the direct authority of C&S.

4. Information Officer

C&S has appointed an Information Officer responsible for overseeing compliance with this Privacy Policy and relevant legislation. The contact details for the Information Officer are:

John Botha

Email: john@circleandsquare.co.za

Phone: 082 457 0000

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. The lawful bases 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.

9. Security Safeguards

C&S implements appropriate technical and organizational measures to ensure the security and confidentiality of personal information, including:

- ❖ Encryption of electronic data

- ❖ Physical security measures for premises and hardware
- ❖ Access controls and authorization procedures
- ❖ Regular security assessments and audits
- ❖ Employee training on data protection and confidentiality

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. Once personal information is no longer required, it is securely destroyed or de-identified.

11. Transfer of Personal Information

C&S 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 Circle & Square business partners, including Global Business Solutions, Kirchmanns Inc, Joint Prosperity and/or Operators (as contracted) in order for Circle & Square 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.

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.

13. Direct Marketing

C&S will only use personal information for direct marketing purposes where the data subject has opted in to receive such communications. Data subjects may opt out of direct marketing at any time by contacting our Information Officer or using the unsubscribe function in electronic communications.

14. Automated Decision Making

C&S does not use personal information for automated decision-making or profiling purposes.

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

C&S 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.

17. Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will notify data subjects of any material changes and obtain consent where required.

18. Complaints

If you have any complaints about our processing of personal information, please contact our Information Officer. You also have the right to lodge a complaint with the Information Regulator:

[eServices: Information Regulator \(info regulator.org.za\)](http://info regulator.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.

12 March 2025

Approved by the Information Officer