

# **BGR NORTJE INCORPORATED**

(Registration number: 2020/720389/21)

## **PRIVACY POLICY**



# Privacy policy

Effective date: 1 July 2021

BGR Nortje Incorporated is committed to protecting the privacy of personal information of our data subjects. The information you share with us as a data subject allows us to provide you with the best experience with our products and services, or as a stakeholder of BGR Nortje Inc.

It is important that you take all necessary and appropriate steps to protect your data yourself (for example, by ensuring that all passwords and access codes are kept secure).

BGR Nortje Incorporated has dedicated policies and procedures in place to protect all personal information collected and processed by us. Please read below for more information on how we collect, process, use and disclose personal information.

Registered address: 36E Adderley Street, Worcester, 6850

Information officer contact details: Gerrit Nortje (023 004 1612)

## Collection of data

Personal data may either be collected directly from you, as data subject, or it may be collected from other sources such as:

- a) From your employing company
- b) Legislative or company documents
- c) Entity representatives
- d) The use of cookies on our website
- e) Social media platforms

Where information is not collected directly from you as a data subject, we will take reasonable steps to inform you of the fact that the information was collected and will be processed.

You must not send us personal information about someone else without first getting his or her consent for it to be used and disclosed in the ways set out in this terms and conditions. This is because we will assume he or she has consented although we may still ask for confirmation from them. Where you do give us information about someone else, or someone else discloses a connection with you, that information may be taken into account with your other personal information.

## Prospective employees

In applying for a position you may provide us with personal information as part of the application process. We may also obtain personal information while performing the required background check, reference check and credit check if relevant.

The personal information that may be obtained during this process is as follows:

Personal information	Purpose for processing	Legal basis for processing
Employment Information- Race, Disability. Equity Gender,	The data processing activity is necessary to enter into or perform a contract with the data subject.	Possible employment and for compliance with the Employment Equity Act.

Background information (Academic records, ID number, Employment history, Language skills, views of other people about the person.	To verify your identity and Information is necessary to determine if BGR can enter into a contract with you.	The data processing activity is necessary to enter into or perform a contract with the data subject
Contact information (Telephone number, email address, physical address)	To verify your identity and Information is necessary to determine if BGR can enter into a contract with you.	The data processing activity is necessary to enter into or perform a contract with the data subject

## Employees

BGR Nortje Incorporated must process personal information of their employees for various legal and employment purposes. The information that will be processed is as follows:

Personal information	Purpose for processing	Legal basis for processing
Employment Equity Information- Race, Gender, Disability.	Possible employment and for compliance with the Employment Equity Act.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Background information (Academic records, ID number, Employment history, Language skills, views of other people about the person.	To verify your identity and Information is necessary to determine if BGR can enter into a contract with you.	The data processing activity is necessary to enter into or perform a contract with the data subject
Contact information (Telephone number, email address, physical address)	To verify your identity and Information is necessary to determine if BGR can enter into a contract with you.	The data processing activity is necessary to enter into or perform a contract with the data subject

## Customers

In order for us to provide you with the best service, we need to collect and process personal information from you as a customer. The information that will be processed is as follows:

Personal information	Purpose for processing	Legal basis for processing
Name, Surname, telephone number, Email address and address.	For correspondence, identification purposes and to determine client's language preference for communication. ID – professional obligation, to enable us to provide the accounting/auditing/payroll or tax services for which we were appointed to.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.

Financial Information such as: financial history, tax number and bank details	Professional obligation, to enable us to provide the accounting/auditing/payroll or tax services for which we were appointed to and for payment purposes.	The data processing activity is necessary to enter into or perform a contract with the data subject
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BGR Nortje Incorporated will keep your personal information confidential at all times, however, you agree and consent that BGR Nortje Incorporated may:

- a) Communicate with you electronically in relation with the service or product being provided (email, fax, telephone or through any other relevant or secured electronic platform)
- b) Obtain any relevant personal information, from any person or institution, necessary to comply with the agreement between you and BGR Nortje Incorporated
- c) Verify the information provided herein and to contact other third party for purposes of the same
- d) Disclose personal information to regulatory or government agencies in accordance with the relevant legislation or directive

### Suppliers

In order for us to communicate with you regarding services you provide/ payment purposes, we need to collect and process personal information from you as a customer. This information will consist of the following:

Personal information	Purpose for processing	Legal basis for processing
Name, Surname, telephone number, Email address and address.	In order to communicate with suppliers and to identify supplier	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Financial Information	For payment purposes	The data subject has given permission for the organisation to process their personal data for one or more processing activities.

### Individuals screened for COVID 19

The following needs to be explained verbally to anyone who needs to complete documentation with personal information for COVID 19 Screening. It may also be documented on the document to be completed:

The personal information collected is necessary to comply with the COVID 19 screening as required by the Disaster management Act and supplementary regulations and directives. This information will be kept confidential unless disclosure is required by law. E.g. should a positive case be identified. If you do not provide the information as required, we can limit or refuse you access to the premises.

## Consent

Where the legal basis for us processing your personal information is consent as above, it will be included in the contract or agreement concluded with you. This consent may be withdrawn at any time, however this withdrawal of consent will not make processing we undertook before your withdrawal unlawful. You will not suffer any detriment for withdrawing your consent.

You may withdraw your consent by contacting our information officer, whose details are provided at the beginning of the privacy policy.

Where the legal basis for processing is for the proper performance of the contract, and you fail to provide us with the information or request us to stop processing this information, it may create limitations on our performance of the contract or agreement.

## Sharing information

In processing your personal information, we may share it with third party processors under an operator's agreement. These include but are not limited to:

- a) Payment processors
- b) Email management and distribution tools
- c) Data storage providers
- d) Server hosts

As an operator, these service providers will not be able to process or use your data for any reason other than to provide the service as required by us. They also need to implement proper safeguards to ensure the personal information is secured at all times.

## Retention

BGR Nortje Incorporated is required to comply with various different legislative retention periods, which leads to different retention requirements. As such we have opted for the longest retention period required from us for legal purposes and apply this to all our data. Your personal information will be kept for a period of 7 years in order for us to comply with all legal requirements.

## Your legal rights

You have the following rights under the Protection of Personal Information Act:

- a) Request access to your personal information
- b) Request a correction or deletion of personal information
- c) Object to the processing of personal information
- d) Lodge a complaint to the Information Regulator

If you want to exercise any of the rights described above, or are dissatisfied with the way we have used your personal information, please contact the information officer.

## Changes to this policy

This policy may change from time to time. The latest effective date will be highlighted at the start of the privacy policy.