

## **Privacy Notice.**

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### **1. Introduction:**

In this document, references to "**WRIGHT BUSINESS PARTNERS (Pty) Ltd**", "we", "us", or "the Group" are to WRIGHT BUSINESS PARTNERS (Pty) Ltd and its subsidiary companies.

WRIGHT BUSINESS PARTNERS (Pty) Ltd recognises its accountability in terms of the Protection of Personal Information Act (hereinafter referred to as **POPIA**), other privacy protection legislation, together with its regulations to all its clients, suppliers, service providers and other third parties. WRIGHT BUSINESS PARTNERS (Pty) Ltd needs to collect personal information from its clients, suppliers, service providers and other third parties to carry out its business.

To maintain a trust relationship with our Stakeholders, we are committed to complying with both the spirit and the letter of POPIA, other privacy protection legislation, and to always act with due skill, care, and diligence when dealing with personal information.

### **2. What is personal information:**

Personal Information according to POPIA, means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person;

- b. Information relating to the education or the medical, financial, criminal, or employment history of the person;
- c. Any identifying number, symbol, e-mail address, telephone number, location information, online identifier, or other particular assignment to the person;
- d. The biometric information of the person;
- e. The personal opinions, views, or preferences of the person;
- f. Correspondence sent by the person that would reveal the contents of the original correspondence;
- g. The views or opinions of another individual about the person; and
- h. The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

### **3. Where and when do we collect personal information:**

We collect personal information directly from you and from authorised third parties during the course of providing our professional services. Personal information may be collected in the following ways:

#### **3.1 Information Provided Directly by Clients**

We may collect personal information when you:

- Contact us via telephone, email, our website, or social media platforms;
- Complete enquiry or online quote request forms;
- Request accounting, tax, payroll, bookkeeping, financial advisory or insurance services;
- Sign engagement letters, mandates, contracts, or service agreements;
- Submit client onboarding documentation and FICA documents;
- Provide information required for SARS, CIPC, UIF, Compensation Fund or other statutory registrations and submissions;
- Provide financial records, bank statements, invoices, payroll information, tax certificates, or supporting documentation;
- Attend meetings, consultations, or virtual appointments with us.

#### **3.2 Information Received from Suppliers and Service Providers**

We may collect personal information from suppliers and service providers through:

- Supplier application forms;
- Contracts and service level agreements;

- Invoices and statements;
- Banking and payment information;
- Contact details of representatives and authorised persons.

### **3.3 Information Received from Third Parties**

Where authorised or required by law, we may obtain personal information from:

- Government departments and regulatory authorities;
- SARS, CIPC, the Department of Labour, the Compensation Fund and other statutory bodies;
- Insurance companies and financial institutions;
- Medical aid schemes and retirement fund administrators;
- Employers, payroll administrators, auditors and accountants;
- Credit bureaux, verification agencies and identity verification services;
- Attorneys, financial advisers and other professional service providers acting on your behalf.

### **3.4 Information Collected Automatically**

When you visit our website or communicate with us electronically, we may automatically collect certain technical information, including:

- IP address;
- Browser type and device information;
- Website usage data;
- Cookies and similar tracking technologies; and
- Communication metadata.

We only collect personal information that is necessary for lawful business purposes, the performance of our contractual obligations, compliance with legal requirements, or where we have obtained your consent to do so.

## **4. When will we process your personal information:**

We will only process your personal information for lawful purposes relating to our business if the following circumstances apply:

- You have **consented** thereto;
- a person legally authorised by you, or a court, has **consented** thereto;

- It is necessary to conclude or perform under a **contract** we have with you;
- The **law** requires or permits it;
- It is required to protect or pursue your, our, or a third party's legitimate interest; and/or
- You are a child, and a competent person (such as a parent or guardian) has consented thereto on your behalf.

**5. When will we process your special personal information:**

Special personal information refers to the following categories of information:

- Religious and philosophical beliefs;
- Race;
- Ethnic origin;
- Trade union membership;
- Political beliefs;
- Health including physical or mental health, disability, and medical history;
- Biometric information;
- Criminal behaviour where it relates to the alleged commission of any offence or the proceedings relating to that offence.

We will process special personal information in the following instances:

- You have **consented** to the processing (in circumstances where we are legally obliged to obtain your consent); or
- It is necessary to exercise or defend a right or obligation in **law**; or
- It is necessary to comply with an international legal obligation of public interest; or
- It is for certain historical, research, or statistical purposes that would not adversely affect your privacy; or
- You have deliberately made your personal information public.

**6. What information do we collect, and how do we use your information:**

Kindly note that the following list is not comprehensive. It sets out the main purposes and data elements collected by WRIGHT BUSINESS PARTNERS (Pty) Ltd

Clients

<b><u>Purpose:</u></b>	<b><u>Data elements:</u></b>
<ul style="list-style-type: none"> <li>• Invoicing</li> <li>• Debit Orders</li> <li>• Service Delivery</li> </ul>	<ul style="list-style-type: none"> <li>• Business Registration Nr</li> <li>• VAT nr</li> <li>• Business Name, t/a name</li> </ul>

<ul style="list-style-type: none"> <li>• To contact you;</li> <li>• Audit &amp; Record keeping;</li> <li>• BEE compliance.</li> </ul>	<ul style="list-style-type: none"> <li>• Banking details</li> <li>• Title</li> <li>• Name</li> <li>• Surname</li> <li>• Id nr</li> <li>• Physical address</li> <li>• Postal Address</li> <li>• Province</li> <li>• Contact numbers</li> <li>• email addresses</li> <li>• Business Sector</li> </ul>
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#### Service Providers / Suppliers

<b><u>Purpose:</u></b>	<b><u>Data elements:</u></b>
<ul style="list-style-type: none"> <li>• Purchase Orders</li> <li>• To contact you;</li> <li>• Audit &amp; Record keeping;</li> <li>• BEE compliance.</li> </ul>	<ul style="list-style-type: none"> <li>• Name:</li> <li>• Bank Details:</li> <li>• Contact Numbers:</li> <li>• Address:</li> </ul>

### **7. How we share your information:**

We may share your personal information with trusted third parties where it is necessary to provide our services, comply with legal obligations, or protect our legitimate business interests. Such parties are required to maintain the confidentiality and security of your information.

#### **Third-Party Service Providers and Professional Partners**

We may share personal information with:

- Payroll software and cloud accounting service providers;
- Insurance companies and underwriting managers;
- Financial product providers and investment administrators;
- Medical aid and retirement fund administrators;
- Banks and payment service providers;

- Independent auditors and external accountants;
- Attorneys, legal advisers and debt collection agencies;
- IT service providers, cloud hosting providers and cybersecurity partners;
- Document storage, archiving and secure shredding service providers;
- Courier and document delivery service providers;
- Identity verification and FICA compliance service providers.

### **Regulatory and Government Authorities**

Where required by law or to fulfil our professional obligations, we may disclose personal information to:

- The South African Revenue Service (SARS);
- The Companies and Intellectual Property Commission (CIPC);
- The Department of Employment and Labour;
- The Unemployment Insurance Fund (UIF);
- The Compensation Fund;
- The Financial Sector Conduct Authority (FSCA);
- The Financial Intelligence Centre (FIC);
- The Companies Tribunal, Master of the High Court and other regulatory authorities;
- Courts, tribunals and law enforcement agencies;
- Other government departments or statutory bodies where disclosure is required by law.

### **Other Disclosures**

We may also disclose personal information:

- With your express consent or instruction;
- Where necessary to perform a contract with you;
- To protect our legal rights or defend legal claims;
- To prevent fraud, money laundering or other unlawful activities;

- Where disclosure is required or permitted under applicable legislation, including the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA).

We do not sell, rent or trade your personal information to third parties for marketing purposes.

Legal Disclosures:

We may need to share your information when we believe it is required by law, legal process or to help protect the rights and safety of you, us, or others. We attempt to notify members about legal demands for their data when appropriate in our judgment unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, at our discretion, that the requests are overbroad, vague, or lack proper authority, but we do not promise to challenge every demand.

## **8. Your rights and obligations:**

Data Retention:

We keep most of your personal information while we still have a purpose, we need to provide you with services or where we are legally obligated to do so.

We will also keep your information where you have agreed for us to do so, or have given your consent that we are allowed to do so.

We keep some of your information even after our business relationship has terminated, if it is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our other user agreements, or fulfil your request to object to our processing of your information.

You have rights in connection with your personal information. You have many choices about how your information is collected, used, and shared.

In certain circumstances, by law, you have the right to:

- **Request access to your information:** You will be able to ask us what information we have about you as well as ask for a copy of this information. This should be done on request to [admin@wrightbizz.co.za](mailto:admin@wrightbizz.co.za) There are some exemptions, which means you may not always receive all the information we process. When we can give you a copy it might be done at a certain fee, which will also be communicated to you at the time of your query.
- **Change or correct information:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- **Delete information:** You can ask us to delete or remove personal information under certain circumstances.
- **Object to processing:** You can do this where we are relying on your legitimate interest, public interest, or our legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes or where you have given your consent for the specific processing and you want to retract your consent. Retracting your consent does not invalidate the information we lawfully processed while we had your consent to do so.
- **Request the restriction of processing:** You can ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.

## 9. Changes to our privacy notice:

Changes to the privacy notice apply to your use of our services. We may modify this privacy notice from time to time, as required by changes in legislation. When material changes are made, we will provide notice through our services, or by other means, to provide you the opportunity to review the changes before they become effective.

You acknowledge that your continued use of our services after we publish our changes to this privacy notice means that the collection, use, and sharing of your personal information is subject to the updated privacy notice.

## 10. Other important information:

### Security:

We have put in place appropriate security measures to prevent your data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information on a business need-to-know basis, and subject to a duty of confidentiality.

### Transborder information transfers:

We do not share any of our clients, suppliers, service providers and other third parties' information across borders.

## **11. Contact Information:**

Should you have a query please send an email to: [steven@wrightbizz.co.za](mailto:steven@wrightbizz.co.za)

### **Our Information Officer:**

Stephanus Jakobus Wright

Email: [Steven@wrightbizz.co.za](mailto:Steven@wrightbizz.co.za)

### **The Information Regulator:**

You have the right to lodge a complaint with the South African Information Regulator. See the Information Regulator contact details below.

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001  
P.O Box 31533, Braamfontein, Johannesburg, 2017

**Complaints email:** [PAIAcomplaints@inforegulator.org.za](mailto:PAIAcomplaints@inforegulator.org.za)

**General inquiries email:** [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

## **12. Document control**

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## **13. Change History:**

Date	Author	Version	Change Reference