

INQ. DIGITAL SOUTH AFRICA

PRIVACY POLICY

inq. Digital South Africa (Pty) Ltd, formerly known as Syrex, (“inq. SA”/“we”) is committed to conducting business in line with applicable laws and the highest ethical standard. This Privacy Policy was developed and implemented by Inq. SA to ensure a lawful, transparent and consistent approach to the processing of your personal information (“Policy or Privacy Policy”).

We reserve the right to amend the terms and conditions of this Policy at any time without notice. It is your duty to remain apprised of the current version of these terms and conditions.

The definitions set out in the Protection of Personal Information Act 4 of 2013 (“POPI”) shall apply to this Policy.

1. INTRODUCTION

This Privacy Policy describes how we collect and use your personal data, who we share it with, and your choices and rights in relation to your Personal Information. By virtue of this Policy, inq. SA:

- 1.1. complies with international legal standards and best practices for processing of Personal Information;
- 1.2. Protects the privacy rights;
- 1.3. Is transparent in relation to the processing of Personal Information; and
- 1.4. Mitigates the risks associated with the processing of Personal Information.

2. APPLICATION

- 2.1. This Policy applies to all to anyone who engages with inq. SA. It can be through our website (www.inq.co.za “the Website”) or as a client, supplier, service provider, contractor, agents, directors, shareholders and employees (“Data Subjects”).
- 2.2. It shall apply from the moment that Personal Information is collected by inq. SA until the moment that the Personal Information is deleted or destroyed.
- 2.3. Compliance with this Policy is mandatory.

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3. DATA PROTECTION PRINCIPLES

POPI is based on a set of core principles that must be observed and complied with at all times. inq. SA promotes and complies with the following 8 principles:

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Principle 1: Accountability

We have appointed an Information Officer, also known as a Data Protection Officer (“DPO”), who is responsible for ensuring that the information protection principles within POPI and the controls that are in place to enforce them are complied with.

Principle 2: Processing Limitation

We collect Personal Information when you engage with us or to perform administrative and business functions.

inq. SA provides a strict context for processing personal information. It is minimal and proportionate to its purpose of delivering services, the lawfulness of processing, minimality of information collected, consent, justification and objection, and the collection of personal information directly from the Data Subject.

Principle 3: Purpose Specification

We only collect Personal Information for a lawful and specific purpose. Record retention is no longer than five years after the purpose for which the Personal Information was collected is complete unless required otherwise by law or necessary for any legal, regulatory, tax, accounting or reporting requirement. The personal information is thereafter destroyed, deleted or de-identified as soon as reasonably practical.

Principle 4: Further processing limitation

We do not further process Personal Information unless such processing is compatible with the purpose for which the information was collected in Principle 3 or the Data Subject has consented or the Responsible Party has warranted that it has obtained adequate consent.

Principle 5: Information Quality

We take reasonable practical steps to ensure that the Personal Information that has been collected is complete, accurate, not misleading and up to date, where necessary.

Principle 6: Openness

inq. SA is open about the collection of Personal Information and takes reasonably practicable steps to ensure that the Data Subject has been made aware that their or its Personal Information is going to be collected.

Principle 7: Security Safeguards

inq. SA ensures that the integrity of the Personal Information in its control is secured through technical and organisational measures.

Principle 8: Data Subject Participation

inq. SA, as a Responsible Party, [has implemented a channel](#) whereby Data Subjects may request a report confirming whether it holds Personal Information about them or it, and may also request a description of such information.

4. CATEGORIES OF PERSONAL INFORMATION PROCESSED BY INQ. SA

Depending on how you interact with us, Personal Information we collect may include:

- 4.1. personal details: names and photographs;
- 4.2. demographic information: date of birth, nationality, title;

- 4.3. identifier information: passport or national identity number, company registration number; VAT number;
- 4.4. contact details: correspondence address; telephone number; email address;
- 4.5. attendance records: details of meetings and other events organised by or on behalf of inq. SA that you have attended;
- 4.6. consent records: records of any consents you may have given, together with the date and time, means of consent and any related information;
- 4.7. telephone records: some telephone calls may be recorded unless specifically requested not to;
- 4.8. payment details: billing address; payment method; bank account number or credit card number; invoice records; payment records.

We do not collect sensitive Personal Information about you, such information relating to your health, religion, political beliefs, race or sexual orientation.

5. PURPOSES FOR WHICH INQ. SA PROCESSES PERSONAL INFORMATION

We will only process Personal Information lawfully and as required in terms of this Policy and/or any agreement entered into with the Operator or the Data Subject. We will process Personal Information in the ordinary course of the business of IT related services. We may use your Personal Information to do the following which is not an exhaustive list:

- 5.1. compile and present a proposal for our solutions and services;
- 5.2. credit checks;
- 5.3. register a new client, vendor, supplier, agent, reseller etc.;
- 5.4. process products and service orders;
- 5.5. enable you to effectively use and to improve our solution and services and fulfill contractual obligations;
- 5.6. making payments or recover money owed;
- 5.7. notify of changes or updates etc.;
- 5.8. administer and protect inq. SA's business;
- 5.9. ensure network and infrastructure security;
- 5.10. communication, development and improvement of services;
- 5.11. compliance with applicable law and fraud prevention;
- 5.12. transfer of information to service providers and other third parties;
- 5.13. internal management and management reporting purposes, including but not limited to: conducting internal audits, conducting internal investigations, implementing internal business controls, providing central processing facilities and for insurance purposes;
- 5.14. relationship management purposes in relation to services, for accounts management, and for marketing activities in order to establish, maintain and/or improve our relationship with you and with suppliers; and
- 5.15. safety and security purposes

6. SHARING PERSONAL INFORMATION WITH THIRD PARTIES

We may disclose Personal Information with:

- 6.1. our affiliates and subsidiaries for the purposes set out in this Privacy Policy;
- 6.2. with business partners with whom we offer co-branded services or engage in joint marketing activities;
- 6.3. with service providers and Operators to provide operational services;
- 6.4. where you consent to the sharing of your personal data;
- 6.5. in connection with, any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company;
- 6.6. for other legal reasons. Legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- 6.7. where it is necessary for the purposes of, or in connection with, actual or threatened legal proceedings or establishment, exercise or defence of legal rights;

Any third parties with whom we share Personal Information are contractually required to implement appropriate data protection and security measures to protect personal data and are not permitted to use personal data for any purpose other than the purpose for which they are provided with or given access to personal data.

7. SECURITY SAVEGUARDS

We have implemented physical, electronic, and managerial security safeguards to protect your Personal Information from accidental or unlawful destruction, loss, alteration, unauthorised access or disclosure by using a combination of physical, administrative and technical safeguards such as:

- 7.1. limited access servers;
- 7.2. Physical and network security measures;
- 7.3. Disaster recovery procedures;
- 7.4. Encryption methods;
- 7.5. Regular internal audits for identifying vulnerabilities and attacks; and
- 7.6. Regular staff training.

8. CROSS BORDER TRANSFERS

As a global company, we may transfer Personal Information to countries where we do business or to international organisations in connection with the purposes identified above and in accordance with this Privacy Policy.

The **inq.** Group of companies have entered an intra group agreement for the establishment of Binding Corporate Rules (“inq. BCR”) to protect the Personal Information of their clients, suppliers and employees during the transfer of personal data within its international group of companies. All

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inq. Companies are bound by the inq. BCR which is aimed at enforcing the terms of this Policy. A copy of the inq. BCR is available at _____ -

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9. YOUR CONSENT, UNDERTAKING AND ACCEPTANCE

By engaging with us in anyway, it is construed and accepted that you consent to inq. SA processing your Personal Information in accordance with the terms of this Policy.

You further consent that we may transfer your information cross border for legitimate business purposes and/or to protect your best interest. All information transfers will comply with applicable laws and the terms of this Policy and where applicable the inq. BCR.

You warrant that the Personal Information provided to inq. SA is accurate, complete and up-to-date. Should Personal Information change, the onus is on the provider of such data to notify us of the change and provide the accurate data.

10. DATA SUBJECT RIGHTS

We adhere to the provisions of POPI, which provide you with certain rights relating to your Personal Information. Your rights include:

10.1.1. To withdraw consent: Where we process personal data based on your consent, you understand that inq. SA may still be authorised to process the Personal Information in accordance with clause 6 and 7 above. You further understand and accept that by withdrawing consent inq. SA may no longer be able to deliver services and shall not be liable for any loss or damages attributable to such withdrawal.

10.1.2. To be informed: You accept the terms of this Policy to be sufficiently informative on what type of personal information will be processed, the reason for the processing, who the personal information will be shared with and whether such information will be sent outside the territory where it is being processed or held, and how the personal information will be safeguarded;

10.2. To log a complaint: You may lodge a complaint or objection with regards to the processing of your personal Information, which complaint or objection must set out and concern a non-compliance by inq. SA with the data processing principles or concern a non-compliance with the data processing laws. A complaint form is available on the Website. On receipt of the complaint or objection, our Information Officer will attempt to resolve the matter internally. Should such resolution fail the data subject has the right to refer the complaint to the Information Regulator at complaints.IR@justice.gov.za .

11. DATE OF PUBLISHING

Last Updated 09 January 2024

If you have any queries about this Privacy Policy please contact our Information Officer, David Herselman at legal@inq.co.za

