

PRIVACY NOTICE.

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1. INTRODUCTION:

In this document, references to "**JFS Rekenaars BK**", "we", "us", or "the Group" are to **JFS Rekenaars BK** and its subsidiary companies.

JFS Rekenaars BK 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. JFS Rekenaars BK 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:

The Company is committed to collecting personal information lawfully and directly from employees wherever possible. In circumstances where indirect collection occurs, we ensure that it aligns with the Protection of Personal Information Act (POPIA) and applicable employment laws.

3.1 CLIENTS

Direct Collection of Client Information:

- **When you contact us, sign up for services, purchase products, or request support:** We collect necessary personal information to begin service provision or respond to requests.
- **When completing application, registration, or consent forms:** This includes forms for service subscriptions, product purchases, and other customer interactions.
- **During invoicing or payment processes:** Information is collected to facilitate secure payment transactions and generate invoices.
- **When you visit our offices or website:** Data such as IP addresses and browser information may be collected during website visits, and physical visitor information at our premises.
- **Through correspondence such as telephone calls, emails, messaging apps, or other communication channels:** We collect personal data through various channels for communication, support, or feedback purposes.

Indirect Collection of Client Information:

- **From publicly available sources (e.g., company registers, websites):** Personal information may be collected from online sources such as directories, social media, and public registers for identity verification or service eligibility.
- **Through referrals or third-party partners:** We may obtain client data from business partners or referrals, such as contact information or details required for product delivery or service provision.
- **From cookies and tracking technologies on our website:** We use cookies and similar technologies to collect data on how users interact with our website for analytics and service improvements.
- **Through credit bureaus or financial verification platforms:** Personal data related to financial history, credit status, or payment verification may be obtained from third parties such as credit bureaus.

3.2 SUPPLIERS & SERVICE PROVIDERS

Direct Collection of Supplier Information:

- **During Supplier Registration:** When suppliers or service providers are onboarded, we collect necessary details to assess and maintain a relationship.
- **Through orders and invoicing:** Supplier details are collected when goods or services are provided, including payment and delivery details.
- **Via communication channels:** Information gathered through emails, phone calls, or in-person interactions, such as order confirmations, contracts, and service agreements.
- **Security systems:** If suppliers or service providers visit our premises, CCTV footage may be collected for security purposes.

Indirect Collection of Supplier Information:

- **From regulatory authorities:** Supplier compliance information such as B-BBEE status, SARS registration, and tax compliance data may be collected from official bodies.
- **From publicly available sources:** Supplier information may be gathered from public business directories, online databases, and social media profiles for verification and validation purposes.
- **From referrals or third-party partners:** We may receive supplier details via third parties or partners, such as industry contacts or business affiliates.
- **Through credit bureaus or financial verification platforms:** Information regarding the financial stability and creditworthiness of suppliers may be gathered from credit verification services.

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 JFS Wisp Pty Ltd.

Clients

| PURPOSE: | DATA ELEMENTS: |
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| Customer Registration and Identity Verification: <ul style="list-style-type: none"> • The company collects personal information to confirm the identity of customers before engaging in any transactions or service provision. This helps prevent identity fraud and ensures that the customer is valid and authorized to receive services. Service & Product Delivery | For Clients <ol style="list-style-type: none"> 1. Personal Identification Information <ul style="list-style-type: none"> ○ Full Name ○ Identity/Passport Number ○ Date of Birth ○ Gender ○ Nationality ○ Company Registration Number (for business clients) 2. Contact Information <ul style="list-style-type: none"> ○ Mobile and Landline Numbers ○ Email Address ○ Physical Address ○ Postal Address |

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| <ul style="list-style-type: none"> • Installation and Onsite Scheduling For technician scheduling, route planning, and confirmation of service fulfilment. <p>Remote Support & Troubleshooting</p> <ul style="list-style-type: none"> • To provide technical support through diagnostics and remote sessions. <p>Account and Relationship Management</p> <ul style="list-style-type: none"> • To communicate with clients about services, statuses, and account matters. <p>Debit Order Authorization</p> <ul style="list-style-type: none"> • To facilitate recurring billing for services <p>Establish and Process Contracts and Invoices</p> <ul style="list-style-type: none"> • To fulfil contractual and invoice obligations with clients, <p>Sales Records and Refund (if applicable) Management</p> <ul style="list-style-type: none"> • To maintain accurate records of sales, invoices, and refund claims <p>Billing and Payment Processing:</p> <ul style="list-style-type: none"> • The company collects personal information to accurately generate invoices for services rendered and to facilitate secure | <ul style="list-style-type: none"> ○ Alternative Contact Details (e.g., emergency contact) ○ Preferred Contact Method (email, phone, text) <p>3. Financial & Payment Information</p> <ul style="list-style-type: none"> ○ Bank Account Number ○ Bank Name ○ Branch Code ○ Payment Card Details (if applicable) ○ Tax Identification Number (for business clients) ○ Credit Information (Credit Score, Limits, etc.) ○ Payment History ○ Mode of Payment Preference (e.g., Credit Card, Debit Order, EFT) ○ Billing Address ○ Transactional Data (e.g., Purchase History, Service Payments, Refunds) <p>4. Transaction & Business Information</p> <ul style="list-style-type: none"> ○ Purchase History (Products, Services, Upgrades) ○ Invoice Records ○ Delivery Details (Delivery Address, Delivery Date, Recipient Details) ○ Order Details (e.g., Order Number, Quantity, Specifications) ○ Refund and Return History (if applicable) ○ Customer Notes (e.g., special preferences, discount eligibility) ○ Service Interaction Logs (e.g., logs from tech support or service calls) ○ Contract/Agreement Data (terms, service level agreements, etc.) <p>5. Legal & Compliance Information</p> <ul style="list-style-type: none"> ○ Tax Compliance Status (SARS registration) ○ Broad-Based Black Economic Empowerment (B-BBEE) Compliance (for business clients) |
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| <p>payment transactions. This also enables the company to maintain transaction history records for accounting and financial auditing purposes.</p> <p>Regulatory and Compliance Reporting:</p> <ul style="list-style-type: none"> Personal information is collected to ensure compliance with financial, tax, and regulatory laws related to the service industry. This information is also used to provide necessary reports to auditors, regulatory authorities, and financial institutions for compliance purposes. <p>Customer Relationship Management:</p> <ul style="list-style-type: none"> Personal information is collected to maintain an effective relationship with customers by providing updates on the status of their vehicle repairs, notifying them of upcoming | <ul style="list-style-type: none"> Consumer Protection Compliance Data (CPA compliance, etc.) Regulatory Certifications (e.g., compliance with ISP regulations) Audit Records Insurance or Warranty Coverage Data Employment/Business Information (for corporate clients) <p>6. Technical & Service Information</p> <ul style="list-style-type: none"> Device Information (type, operating system, model) Network Configuration (IP Address, Network Usage, Bandwidth) Service Usage Logs (access times, data usage, system errors) Service Quality Data (e.g., latency, speed, uptime) Support Interaction Records (e.g., troubleshooting logs, resolutions provided) Remote Support Data (e.g., session records, access logs) <p>7. Marketing & Preferences Data</p> <ul style="list-style-type: none"> Marketing Preferences (email, SMS, or postal communication preferences) Survey Responses (participation in promotional or feedback surveys) Customer Segmentation Data (e.g., interests, past purchase behavior) Opt-in Consent Records (for promotions, marketing campaigns, etc.) <p>8. Security & Fraud Prevention Data</p> <ul style="list-style-type: none"> Device & Access Logs (e.g., IP addresses, login history) Transaction Monitoring Data (fraud detection, chargebacks, suspicious activity) Authentication Data (e.g., security questions, 2-factor authentication logs) |
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| <p>service reminders, and responding to customer inquiries, complaints, and feedback to enhance customer satisfaction.</p> <p>Fraud Detection and Security Measures:</p> <ul style="list-style-type: none"> • The company uses personal information to monitor the premises using CCTV for security and fraud prevention. It also helps authenticate vehicle ownership before releasing serviced vehicles and verify insurance claims to ensure legitimate transactions <p>Dispute Resolution and Complaint Handling:</p> <ul style="list-style-type: none"> • Personal information is collected to assist in legal disputes, complaints, or refund claims. This ensures proper resolution and maintains a record of communications for future reference. This data also facilitates collaboration with legal | <ul style="list-style-type: none"> ○ Video Surveillance Data (CCTV footage at physical locations) |
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| <p>representatives when needed.</p> <p>Communication and Updates:</p> <p>Personal information is used to notify clients about the progress and completion of service or delivery. It also helps in informing customers about outstanding or upcoming payments</p> | |
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Service Providers / Suppliers

| PURPOSE: | DATA ELEMENTS: |
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| <p>Supplier and Service Provider Onboarding and Management:</p> <ul style="list-style-type: none"> To verify and approve new suppliers and service providers and to assess business credentials, compliance, and financial stability. <p>Business Relationship Management</p> <ul style="list-style-type: none"> To establish and maintain supplier and service provider relationships. <p>Financial Transactions –</p> <ul style="list-style-type: none"> To process payments for services rendered or goods supplied. <p>Legal and Compliance Documentation:</p> <ul style="list-style-type: none"> Personal information is | <ol style="list-style-type: none"> Business Identification Information <ul style="list-style-type: none"> Company Name Business Registration Number VAT Number Legal Entity Type (e.g., Sole Proprietor, Partnership, Corporation) Industry Classification (e.g., technology, retail, service provider) Contact Information <ul style="list-style-type: none"> Business Address Main Contact Person's Name and Title Contact Number (mobile and/or landline) Business Email Address Website URL Alternative Contact Methods (secondary contacts, emergency numbers) Financial Information <ul style="list-style-type: none"> Bank Account Details (account number, bank name, branch code) Payment Terms (e.g., net 30 days, net 60 days) Credit Information (credit ratings, credit history) Invoice History (records of payments and outstanding invoices) Tax Status (VAT registration, tax clearance certificates) Financial Statements (if required for auditing purposes) |

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| <p>collected to confirm that suppliers meet all regulatory requirements and hold necessary certifications. This helps maintain a database of business agreements and compliance records while conducting due diligence</p> <p>Compliance with Legal & Regulatory Requirements</p> <ul style="list-style-type: none"> • To comply with consumer laws • To comply with tax regulations (SARS) and BEE compliance requirements <p>Operational Efficiency</p> <ul style="list-style-type: none"> • To maintain proper record-keeping for business transactions and financial audits. <p>Financial Auditing and Record-Keeping:</p> <ul style="list-style-type: none"> • To maintain financial records for internal and external audits. to provide financial data to auditors, tax consultants, and statutory bodies for compliance checks and To ensure transparency and | <p>4. Compliance & Regulatory Information</p> <ul style="list-style-type: none"> ○ Tax Compliance Status (SARS clearance certificates) ○ B-BBEE Certification (if applicable) ○ Compliance with Industry Standards (ISO certifications, regulatory compliance, etc.) ○ Insurance or Bonding Information (coverage for work or services provided) ○ Regulatory Reporting (compliance with relevant local or international regulations) ○ Health and Safety Compliance Data (if applicable) <p>5. Contractual & Agreement Information</p> <ul style="list-style-type: none"> ○ Signed Agreements (Service Level Agreements, contracts) ○ Order Fulfilment Agreements (details on supply or service delivery) ○ Non-Disclosure Agreements (NDAs, confidentiality terms) ○ Service Delivery Records (contract execution, fulfilment) ○ Performance Reports (vendor performance, quality control, audits) <p>6. Transaction & Service History</p> <ul style="list-style-type: none"> ○ Purchase Orders (details on products or services ordered) ○ Delivery Details (e.g., quantities, delivery dates, recipients) ○ Invoice and Payment Records (records of all payments made, and receipts issued) ○ Order Fulfillment Data (e.g., order statuses, delivery tracking) <p>7. Communication Data</p> <ul style="list-style-type: none"> ○ Correspondence Logs (emails, letters, meeting notes, calls) ○ Communication Preferences (preferred methods of contact) ○ Service Updates (product recalls, service changes, updates on orders) ○ Dispute Resolution Records (communication regarding disputes, complaints, or claims) <p>8. Security & Risk Management Data</p> <ul style="list-style-type: none"> ○ Security Screening Data (e.g., background checks, fraud checks, vendor risk assessment) ○ Insurance Data (e.g., coverage for services, worker's compensation) ○ Risk and Safety Audits (if applicable, for onsite work or product manufacturing) |
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| <p>accountability in financial transactions</p> <p>Legal Dispute Resolution and Contract Enforcement:</p> <ul style="list-style-type: none"> To resolve legal disputes. To provide relevant information to legal practitioners in case of contract breaches or disputes. To comply with court orders, subpoenas, or regulatory investigations. <p>Communication and Coordination</p> <ul style="list-style-type: none"> To facilitate smooth business operations and respond to supplier or service provider queries. | |
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7. HOW WE SHARE YOUR INFORMATION

In accordance with the Protection of Personal Information Act (POPIA), we may share personal information with third parties for various purposes related to service provision, legal compliance, financial transactions, and other business operations. The third parties we may share personal information with are listed below, along with the purpose and examples of these third parties.

Operational Partner

To assist in fulfilling orders, providing customer support, technical services, and network diagnostics. (Internet Service Providers (ISPs), Payment Gateway Providers, Marketing Agencies, Hosting Providers)

Regulatory Authorities

To comply with legal requirements such as tax regulations, industry compliance, and consumer protection laws. SARS), (FIC) (e.g., ICASA for telecommunications).

Credit Bureaus & Financial Verification Platforms

To assess creditworthiness, prevent fraud, and verify financial information for payment processing.(TransUnion)

Legal Professionals & Consultants

To manage legal disputes, compliance issues, and other legal matters. (Attorneys, Legal Advisors, Dispute Resolution Providers)

Delivery & Logistics Partners

To fulfil orders and deliver products or services (e.g., DHL, Aramex),

Auditors & Accountants

To perform financial audits, ensure compliance with tax regulations, and ensure financial integrity. (Chartered Accountants, External Auditors, Accounting Firms)

Financial Institutions

Banks and payment processors for processing payments, facilitating refunds, and ensuring compliance with financial and regulatory requirements related to banking transactions and financial reporting. (Banks, Payment Processors, Payment Gateway Providers)

Law Enforcement and Fraud Prevention Agencies

To detect and address fraud, security threats, or legal disputes.(e.g., police, national security agencies), (e.g., credit bureaus, fraud detection services).

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 jfswart@mweb.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: **jfswart@mweb.co.za**

OUR INFORMATION OFFICER:

Name and Surname: **Jofrannie Swart**

Email **jfswart@mweb.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

General inquiries email: enquiries@inforegulator.org.za

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