



**PRIVACY POLICY
OF
IN-TO-BOOKKEEPING CC**

Prepared in accordance with the provisions of the Protection of Personal Information Act, no 4 of 2013

INTRODUCTION

The Protection of Personal Information (“POPI”) Act emanates from Section 14 of the Constitution of the Republic of South Africa, 1996, which section provides that everyone has the right to privacy, and it includes a right to protection against the unlawful collection, retention, dissemination and use of personal and / or company information.

The POPI Act has been promulgated to regulate, in harmony with the international standards, the processing of personal and company information by public and private bodies in a manner that gives effect to the right to privacy, subject to justifiable limitations that are aimed at protecting other rights and important interests.

IN-TO-BOOKKEEPING CC is committed to protecting your privacy and the confidentiality of any personal and company information that you provide to us.

The purpose of this policy is to inform our clients about the type of personal and company information In-To-Bookkeeping CC collects and the ways in which it is collected, used, shared, protected and stored.

When you provide us with your personal and / or company information, you indicate your acceptance of this policy.

In-To-Bookkeeping CC reserves the right to change this policy from time to time.

1. What is personal information

The POPI Act defines personal information as “information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person”. Examples of personal information include, but are not limited to, names, addresses, contact numbers, email addresses, demographic information and financial information.

Examples of company information include, but are not limited to, company registration number, addresses, owners or director’s information, contact numbers, tax related registration numbers and financial information.

2. Scope of our Privacy Policy

- To disclose how and when we obtain information for a specific purpose.
- To ensure that the information is relevant and up to date.
- To have reasonable security measures in place to protect the information.
- To only keep the necessary information and delete information no longer required.
- To allow you to obtain or view your information on request and update it.

3. How we obtain personal and company information

We obtain and process your personal and company information based on information received from yourselves, auditors and related parties.

The POPI Act provides that personal and company information must be collected:

- Directly from you / the company
- From a public record
- From another source, where the collection of the information will not prejudice your legitimate interests
- From another source where the collection of the information is necessary:
 - to comply with an obligation imposed by law or
 - to maintain our legitimate interests or the legitimate interests of a third party to whom the information is supplied.

4. How we use your information

We need to collect and use personal, company and other information in order to enable us to:

- Respond to your enquiry.
- Provide services as contracted.
- Comply with legal requirements or industry codes.
- Provide and distribute monthly statements.
- Communicate with you and inform you of new services and offerings.
- Ensure that our business offering meets your requirements.
- Make payments.

5. Disclosure of information

We may disclose your personal or company information to third parties on the following basis:

- Where we have your consent; or
- Where we are required to do so by law; or
- To our panel of auditors who are involved in your company's financial matters.
- To our panel of accountants and tax practitioners who are involved in your company's financial matters.
- Where required to protect your legitimate interests.
- When necessary for pursuing our legitimate interests or the legitimate interests of a third party to whom the information is supplied.

Whenever we appoint third parties to provide support services to us, we will, where reasonably practical, bind them to our Privacy Policy, when they require us to provide them with your personal and or company information to perform such services.

We, In-To-Bookkeeping CC, have required the following third parties:

- Panel Auditors
- Panel Accountants
- Panel Tax Practitioners

to sign a declaration confirming that they will apply the same principles as set out in our Privacy Policy and the same required due care and diligence in protecting your personal and company information. This declaration which they sign, ensures that they acknowledge their obligation to similarly protect the privacy and regulate their use of your personal and company information.

We advise our clients, where reasonably possible, to ensure that similar third-party declarations are signed where service providers are appointed, who are not part of the group of service providers referred to above.

6. Information security

In-To-Bookkeeping CC undertakes to review security controls and related processes to ensure that your personal and company information remains secure.

In the event of your information being shared with third parties as provided for in paragraph 6 hereof, please bear in mind that In-To-Bookkeeping CC will not have any control over your personal and company information once its shared and will not be able to take responsibility for the security of that information thereafter.

Please also bear in mind that no data transmitted over the internet, or information stored on a server which is accessible through the internet, can be guaranteed or fully secure.

We will not sell or lease your information to any third parties unless we have your permission to do so.

We will not distribute your personal nor your company's information to any third parties unless we have your permission to do so or are required to do so in order to:

- Perform our contractual obligations.
- Protect your legitimate interests, or
- Comply with one or more laws.

7. Correction of your personal and company information

You may request us to:

- Correct or delete personal or company information in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- Destroy or delete personal or company information about you that we are no longer authorized to retain in terms of Section 14.

Section 14 provides that we may retain your personal or company information where it is required by law, or for the performance of our functions or activities, or to comply with our contractual requirements.

If you believe that any of your information in our possession is incorrect, incomplete or should be deleted, please email the completed:

- objection to the processing of personal or company information form, attached as Form 1, or
- deletion of personal or company information form, attached as Form 2

to us at *margeret@intobookkeeping.co.za* and we will correct, update or delete the information, where required.

Your personal and company information will be destroyed once it is no longer necessary for achieving the purpose for which it was collected, provided that it is not required to be retained in terms of our contractual obligations or by law.

8. How we use cookies

A cookie is a small file that is placed on your computer's hard drive. Once the file is added, the cookie in question helps to analyses web traffic or tracks when you visit a particular site.

Cookies allow web applications to respond to you as an individual. The web application can, as a result of the cookies, tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic cookies to identify which pages are being accessed. This helps us analyze data about the web page traffic and improve our website in order to tailor it to our client's needs. The information is only used for statistical purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website and browsing experience. A cookie does not give us access to your computer or any information about you, other than the data you choose to share with us.

Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer.

Please be advised however, that denying access to cookies may prevent you from taking full advantage of the website.

FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached*
 2. *If the space provided for in the Form is inadequate, submit information as an Annexure to this Form and sign each page*
 3. *Complete as is applicable*

A		DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject:		
Unique Identifier / Identity Number:		
Residential, postal or business address:		
		Code ()
Contact number(s):		
Fax number / E-Mail address:		
B		DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered name of responsible party:		
Residential, postal or business address:		
		Code ()
Contact number(s):		
Fax number / E-Mail address:		
C		REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) TO (f) (Please provide details reasons for the objection)

Signed at..... this..... Day of..... 20.....

Signature of data subject / designated person

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELEGATION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
 [Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached*
2. *If the space provided for in the Form is inadequate, submit information as an Annexure to this Form and sign each page*
3. *Complete as is applicable*

Mark the appropriate box with an "X"

Request for:

- Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party
- Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

A	DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-Mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-Mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/DESTRUCTED/DESTROYED

D

REASONS FOR CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or REASONS FOR DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORTISED TO RETAIN
(Please provide detailed reasons for the request)

Signed at.....this.....Day of.....20.....

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Signature of data subject / designated person