

PROTECTION OF PERSONAL INFORMATION (POPI) ACT POLICY

1 Introduction

- 1.1 DYNAMITECH CC is a close corporation duly registered in South Africa with registration number 2003/093627/23.
- 1.2 DYNAMITECH CC is obliged to comply with The Protection of Personal Information Act ("POPI").
- 1.3 POPI requires DYNAMITECH CC to inform you as to how your Personal Information is collected, stored, protected, used for, disclosed and destroyed (collectively referred to as "process") in this policy, hereafter referred to as "This Policy".
- 1.4 For the purpose of This Policy, "DYNAMITECH CC", "us", "our" and "we" include DYNAMITECH CC, its owners, employees and all its related entities.
- 1.5 For the purpose of This Policy, "you" and "your" is any natural or juristic person, including but not limited to individuals, representatives of businesses and organisations as well as users of any of our services or products whose Personal Information we process.

2 Collection of Personal Information

- 2.1 The type of Personal Information we collect:
 - 2.1.1 The type of Personal Information DYNAMITECH CC collect will depend on the need for which it is collected and will be processed for that purpose only as required by Section 9 of the POPI Act. Whenever possible, we will inform you what Personal Information is required and what Personal Information is optional, and how we will use the information we collect.
 - 2.1.2 Personal Information we may collect include:
 - Personal Details: name and surname.
 - Demographic Information: gender, date of birth, nationality, title, preferred language etc.
 - Identifier Information: copy of passport or South African identity document.
 - Contact Details: physical and postal addresses, telephone number, email address.
 - Instruction Details: Personal Information included in correspondence, documents and other materials we process while providing services to you.
 - Consent Records: records of any consents you may have given DYNAMITECH CC, together with the date and time, means of consent and any related information.
 - Supporting Documents: any documents that may be required by DYNAMITECH CC in order to provide the service(s) as per your instructions, or our standing agreement with you. These may include finance statements, mortgage statements, receipts, utility bills, travel logs, vehicle detail, tenancy agreements, medical aid information, IRP5's, salary slips, proof of investments etc.
 - Employer Details: the name, address, telephone number and email address of your employer, to the extent relevant.
 - Internal Details: correspondence history, payment habits, interaction habits etc.

- 2.2 We may collect Personal Information in the following ways:
 - 2.2.1 directly: in person, via telephone, via electronic communication, in writing, new client form
 - 2.2.2 during our professional relationship with you
 - 2.2.3 when you submit Personal Information via our website, digital forms or any of our social media platforms
 - 2.2.4 via third parties: law enforcement, our legal representatives, bureaus, SARS, CIPC

3 How we use your Personal Information

3.1 Your Personal Information will be used for the purpose it was collected, namely to perform the once off or recurring services you instructed us to perform, or as per our standing agreement with you. This include, but are not limited to:

- 3.1.1 Submission of Income Tax Returns and all related actions
- 3.1.2 Submission of Provisional Income Tax Returns and all related actions
- 3.1.3 Registration for Income Tax Returns
- 3.1.4 Registration for Provisional Income Tax Returns
- 3.1.5 Registration of a Company
- 3.1.6 Application for an Importers Code
- 3.1.7 Corresponding with SARS on your behalf

3.2 Your Personal Information may also be used for:

- 3.2.1 Internal Auditing and record keeping purposes
- 3.2.2 Internal reporting
- 3.2.3 Communicating changes in our Terms & Conditions, This Policy, Agreements, fees etc to you
- 3.2.4 Inform you about new services DYNAMITECH CC offer, or changes to existing services
- 3.2.5 Inform you about changes in DYNAMITECH CC (eg change in contact details, new employees etc)
- 3.2.6 Debt collecting and legal proceedings

3.3 According to Section 10 of the POPI Act, we may only process Personal Information if certain conditions are met. These conditions are:

- 3.3.1 You must consent to the processing of Personal Information – consent is obtained from you upon entering into an agreement with DYNAMITECH CC, or giving us instruction to perform requested services;
- 3.3.2 Processing is necessary – Personal Information is required to facilitate our services to you;
- 3.3.3 Processing complies with an obligation imposed by law on DYNAMITECH CC;
- 3.3.4 Processing protects a legitimate interest of you – it is in your best interests to have access to the services we provide;
- 3.3.5 Processing is necessary for pursuing the legitimate interests of DYNAMITECH CC – in order to provide services to you, we need certain Personal Information from you.

4 Disclosure of Personal Information

4.1 We may disclose your Personal Information to our Associates, Service Providers and Governmental Bodies for legitimate business purposes, in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality.

4.2 Our Associates include, but are not limited to:

- 4.2.1 External auditors;

4.3 Our Service Providers include, but are not limited to:

- 4.3.1 Accounting software providers (Xero Accounting, Sage One Accounting, Pastel etc.)
- 4.3.2 Debt collecting companies
- 4.3.3 Attorneys

4.4 Governmental Bodies include, but are not limited to:

- 4.4.1 SARS (South African Revenue Service)
- 4.4.2 CIPC (The Companies and Intellectual Property Commission)
- 4.4.3 UIF (Unemployment Insurance Fund)
- 4.4.4 WCA (Workmen's Compensation Fund)

4.5 In addition, we may disclose your Personal Information:

- 4.5.1 to communicate with any third-party institutions in order to obtain information or documentation on your behalf. Such third-party institutions include but are not limited to medical aid schemes, investment brokers etc,
- 4.5.2 if required by law,
- 4.5.3 to regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation,
- 4.5.4 third party providers (including but not limited to data processors such as providers of data hosting services),

5 Safeguarding Personal Information

5.1 The POPI Act require that DYNAMITECH CC implement the necessary measures to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. The safeguarding of Personal Information is our top priority, and we continuously review our security controls and processes to ensure that your Personal Information is secure.

5.2 We encourage a paperless business practice as far as possible, and as such, have implemented a digital cloud working environment. This means that all our data, including the Personal Information we process, our emails and digital media are stored on a server off site. A third-party service provider, XNEELO, is mandated to manage this server in the safety of one of their data centres. You can read more about XNEELO's security measure on this page: <https://xneelo.co.za/legal/security/>

5.3 Personal Information on the server can only be accessed by our authorised personnel via a system that require login details. The access and transmission of data and media are all done over secure socket connections only. All access and processing of data via our system are logged in detail.

5.4 Where property, including but not limited to documents, files and digital media, containing Personal Information of you, are required by us to perform our duties, it is preferred that you give us reasonable access to such information at your premises at your own risk.

5.5 In the event that property, including but not limited to documents, files and digital media, containing Personal Information of you, are given to us for processing, we'll take reasonable safety measures when handling and storing property, such as storing given property in a locked filing cabinet under surveillance, but it ultimately remains your responsibility to ensure that a useable copy of the information remain in your possession.

5.6 Whenever Personal Information must be made available in a physical form, such as a printout, we'll destroy such information as soon as the Personal Information was processed as intended.

6 Accuracy of Personal Information

- 6.1 Personal Information provided by you to us must be correct, accurate, complete and up to date.
- 6.2 Should any of your Personal Information, that we require in fulfilling our duties, change, it is your responsibility to notify us of such changes and provide us with the new information. This can be done via email to accounts@dynamitech.co.za

7 Access to Personal Information

- 7.1 You have the right to request access to the Personal Information we hold about you.
- 7.2 You can submit such a request via email to accounts@dynamitech.co.za

8 Retention of Personal Information

- 8.1 DYNAMITECH CC shall only retain and store Personal Information for the period for which the information is required to serve its primary purpose, or a legitimate interest, or for the period required to comply with an applicable legal requirement, whichever is longer.
- 8.2 When Personal Information is no longer required to serve its primary purpose, digital records thereof will be deleted, property containing the Personal Information will be handed back to its owner and all other physical forms containing this information in our possession will properly and safely be disposed of.

9 Your legal rights with regards to your Personal Information

- 9.1 You may, at any time, request that we:
- 9.1.1 erase the Personal Information we hold of you;
 - 9.1.2 restrict the use of the Personal Information we hold of you;
 - 9.1.3 transfer the Personal Information you have made available to us;
- 9.2 All requests with regards to your Personal Information can be sent via email to accounts@dynamitech.co.za
- 9.3 Should you request that we erase your Personal Information, we will:
- 9.3.1 Delete all digital records containing your Personal Information
 - 9.3.2 Return all property belonging to you containing your Personal Information
 - 9.3.3 Properly and safely dispose of other physical forms containing your Personal Information in our possession.

9.4 DYNAMITECH CC may not honour your requests when the processing of your Personal Information is pursuant to:

9.4.1 a statutory obligation;

9.4.2 a contractual obligation;

9.4.3 a legitimate interest;

10 Amendments to This Policy

10.1 Amendments to this Policy will take place on an ad hoc basis.

10.2 You are advised to check our websites periodically to inform yourself of any changes.

10.3 Where material changes take place, you will be notified directly