



FREED CONSULTANCY (PTY) LTD

PRIVACY POLICY

Introduction

We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (personal information).

Who it applies to

This policy applies to you if you are:

- a visitor to our website; or
- a client who has requested or to whom we currently provide services to.

Personal information

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected when you contact us (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Common examples

Common examples of the types of personal information which we may collect and process include your:

- identifying information such as your name, date of birth, or identification number of any kind;
- contact information such as your phone number or email address;
- address information such as your physical or postal address; or
- demographic information such as your gender or marital status.



Sensitive personal information

Depending on the services that you require, we may also collect sensitive personal information including your:

- financial information such as your bank account details;
- sensitive demographic information such as your race or ethnicity;
- medical information such as information about your physical or mental health;
- criminal information such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- employment information including your membership of a trade union; and

Acceptance

Acceptance required

You must accept all the terms of this policy when you request our services. If you do not agree with anything in this policy, then you may not request our services.

Legal capacity

You may not access our website or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our services. If you continue to use the website or our services following notification of a change to the terms, the changed terms will apply to you, and you will be deemed to have accepted those updated terms.

Data Collection

On request for our services

When you request our services you will be required to provide us with certain personal information.



This personal information will include (but not limited to):

- your name and surname;
- your email address;
- your telephone number;
- company information like:
 - your company name
 - your company registration number
 - your company postal address or street address
 - your company income tax number
 - your company Pay As You Earn number
 - your company UIF number and
 - your company VAT number;
- personal information like (where we are providing personal income tax services):
 - your name
 - your identity number
 - your postal address or street address
 - your marital status
 - your spouses identity number
 - your income tax number

We will use this personal information to undertake the agreed upon compliance services and any additional services you require.

On order or request

When you request our services from us, you will be asked to provide us with additional information on a voluntary basis.

Note that any data requested will only be collected with your express consent and solely for the purpose of undertaking agreed upon services.

From browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

Cookies

We may place small text files called “cookies” on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- improving how our website performs;
- allowing third parties to provide services to our website; and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.



Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at www.allaboutcookies.org.

Third party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

Web beacons

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

Recording calls

We may monitor and record any telephone calls that you make to us, unless you specifically request us not to.

Purpose for collection

We may use or process service information you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- service purposes such as collating requests for the provision of services;
- marketing purposes such as pursuing lawful related marketing activities;
- business purposes such as accounting and tax compliance and business planning;
- disposals of business, or other proposed and actual transactions; and

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you
- access the website;
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with
- your usage of the website.

Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any personal information or optional information as required by us to undertake the agreed upon services as per our engagement letter



Use of data

Our obligations

We may use your personal information to fulfil our obligations to you.

Messages and updates

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages. OR We may send administrative messages and email updates to you about the website. We may wish to provide you with information about new services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages. We will not send you promotional messages unless you have chosen to opt-into them. But, we may send you one message asking you to opt-into promotional messages without you having opted-into promotional messages.

Disclosure

Sharing

We do not share your personal information.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

Marketing purposes

We may disclose aggregate statistics (information about the client population in general terms) about the personal information to advertisers or business partners.

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs.

Change of ownership



If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. The various cloud-based platforms we use, including our website hosting company, have advanced security measures to prevent interference or access from outside intruders. These policies can be found here:

- Xero Accounting Software <https://www.xero.com/za/about/security/>
- DEXT <https://dext.com/za/privacy-policy>
- SimplePay <https://www.simplepay.co.za/payroll-software/security/>
- Zoho Forms <https://www.zoho.com/forms/secure-forms.html>
- Info Doc's *available on request as not digitally available*
- Draftworx <https://cloud.draftworx.com/#/privacyPolicy>
- Spotlight Reporting <https://encr.pw/MOrQZ>

We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information by providing you with a form link. If you'd like to confirm what information we hold on file for you please contact us via email requesting the like. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to or making any corrections to your personal information.

Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

Transfer to another country

We will not transfer any personal information across a country border without your prior written consent.



Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us at: privacy@freedconsultancy.com. You have the right to make a complaint at any time to the South African Information Regulator for data protection issues (<https://www.justice.gov.za/inforeg/>). We would, however, appreciate the chance to deal with your concerns before you approach the South African Information Regulator so, please contact us in the first instance.