



**INLEXSO PROPRIETARY LIMITED**  
**(“inlexso”)**

**Privacy Statement**

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## DEFINITIONS

<b>Data Subject(s)</b>	This refers to the living, natural or juristic person to whom Personal Information relates, such as an individual client, customer, employee, independent contractor, supplier or a company that supplies the organisation with products or other goods.
<b>Information Officer</b>	For purposes of this Statement, the Information Officer is the person authorised to handle PAIA and POPIA requests on behalf of inlexso.
<b>PAIA</b>	Promotion of Access to Information Act 2 of 2000 and Regulations regarding the promotion of access to information, 2002
<b>Personal Information</b>	<p>For purposes of this Statement, Personal Information shall be Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• information relating to the education or the medical, financial, criminal or employment history of the person;</li> <li>• any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</li> <li>• the biometric information of the person;</li> <li>• the personal opinions, views or preferences of the person, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;</li> <li>• correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>• the views or opinions of another individual about the person;</li> <li>• 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</li> </ul>

	information about the person, but excludes information about a person who has been dead for more than 20 years
<b>POPIA</b>	Protection of Personal Information Act 4 of 2013 and the Regulations relating to the protection of personal information, 2018
<b>Process/ Processing/ Processed</b>	<p>The act of processing information includes any activity or any set of operations, whether or not by automatic means, concerning personal information and includes:</p> <ul style="list-style-type: none"> <li>• the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;</li> <li>• dissemination by means of transmission, distribution or making available in any other form; or</li> <li>• merging, linking, as well as any restriction, degradation, erasure or destruction of information.</li> </ul>
<b>Sensitive Personal Information</b>	Includes the standard types of sensitive personal data or information such as Personal Information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject (excluding genetic information) and information concerning the criminal behaviour of a Data Subject to the extent that such information relates to: (i) the alleged commission by a Data Subject of any offence; and (ii) any proceedings in respect of any offence allegedly committed by a Data Subject or the disposal of such proceedings.
<b>Stakeholder(s)</b>	Include employees, consumers and customers, vendors, contractors, service providers and other third-parties of inlexso.

## **1. INTRODUCTION**

inlexso Propriety Limited (“inlexso”, “We” / “Us”/ “Our”) understands the value of Personal Information and recognises the right to privacy. Therefore, We commit to protecting this asset and ensure that Personal Information is Processed appropriately, transparently, securely and in accordance with applicable data privacy laws.

This Privacy Statement (“Statement”/ “It”) sets out inlexso’s practices insofar as it relates to Data Subjects’ Personal Information. This Statement also outlines in general how We Processes Personal Information; how We obtain and use the Personal Information and the measures We have in place to protect this information; and an identifiable, living natural person or a juristic person (“Your”/ “You”) rights in relation to this information in accordance with the requirements of the Protection of Personal Information Act 4 of 2013 (“POPIA”).

Furthermore, this Statement will also set out Our responsibilities and obligations in terms of POPIA and other applicable legislation, such as the Promotion of Access to Information Act 2 of 2000 (“PAIA”), in so far as receiving, providing and Processing Your Personal Information on an ongoing basis.

This Statement should be read in conjunction with POPIA, inlexso’s Guide on Records Management and the inlexso’s Access to and Protection of Personal Information Manual (“Manual”).

## **2. SCOPE AND APPLICATION**

This Statement applies to all Our Processing activities of Personal Information.

For avoidance of doubt, the Statement applies to all Data Subjects (both identifiable, living natural and juristic) whose Personal Information We collect. This includes Our Stakeholders.

This Statement also finds application to any Processing activities where Data Subjects access any of Our premises and electronic platforms (which include Our Website, email and social media).

## **3. PRIVACY NOTICE**

### **3.1. Collection of Personal Information**

inlexso may collect or obtain Personal Information of a Data Subject:

- directly from the Data Subject;
- in the course of Our relationship with the Data Subject;

- in the course of providing a service to You or Your organisation;
- when a Data Subject visit and/or interact with Our Website or our various social media platforms;
- when You register to use any of Our legal and related services (direct marketing newsletters, seminars and legal updates);
- when You interact with any third party content or advertising on Our Website; and
- We may also receive Personal Information about You from third parties (e.g. law enforcement authorities).

The type of Personal Information We collect will depend on the purpose of collection and what We intend to do with the information.

Please note: We will advise Data Subjects of the purpose of collection of their Personal Information at the time We collect it.

### 3.2. Use of Personal Information

We will use Your Personal Information for the purposes for which it was collected. Any further Processing of Your Personal Information (if required) will only be done in accordance or compatible with the purpose for which it was originally collected. Where necessary, Your information may be retained for a certain period for legal or contractual purposes.

We may use Personal Information provided for purposes, including but not limited to:

- To concluding a contract with You;
- To confirm and verify Your identity or to verify that You are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- For auditing purposes;
- For legal proceedings;
- To communicate and manage our relationship with You (which includes marketing and feedback surveys; and
- To manage security and access control to Our buildings and facilities.

#### **4. SENSITIVE PERSONAL INFORMATION**

Where inlexso needs to Process Sensitive Personal Information, We will do so in the ordinary course of Our business, for a legitimate purpose, and in accordance with applicable law.

#### **5. DISCLOSURE OF INFORMATION**

We may disclose Your Personal Information to Our service providers, who are involved in the delivery of products or services to You. We have agreements in place to ensure that they comply with the privacy requirements as required by POPIA and these agreements include non-disclosure or confidentiality provisions.

We may also disclose Your Personal Information:

- Where We have a duty or a right to disclose in terms of law or industry codes;
- Where We believe it is necessary to protect Our rights; and
- With Your consent or upon Your request.

#### **6. SECURITY SAFEGUARDS**

We will implement appropriate technical and organisational security measures to protect Your Personal Information that is in Our possession against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, in accordance with applicable law.

We will continue to review Our safeguard measures and controls, as well as all related processes, to ensure that Your Personal Information remains secure.

When We contract with third parties, We impose reasonable and appropriate security, privacy and confidentiality obligations on them to ensure that all Personal Information that we remain responsible for, is kept secure.

#### **7. RIGHTS OF DATA SUBJECTS**

We will ensure that Our Stakeholders are made aware of their rights conferred upon them as Data Subjects and will Process their Personal Information in terms of the conditions as set out in POPIA.

Please note: All requests made under this clause 7 will be evaluated on a case-by-case basis on their own merits, and We reserve the right to decline to grant Your request in accordance with the provisions of PAIA and POPIA, Our internal policies and the procedure and payment of the

prescribed fees for requests, as set out in Our Manual. Nothing in this Statement guarantees nor implies that all requests would be honoured.

#### 7.1. Right to Access Personal Information

You have the right to request a copy of the Personal Information We hold about You.

Data Subjects shall make the request in terms of Section 53 of PAIA and specifically, as set out in Our Manual which is available on Our website or upon request from the Information Officer on: [compliance@inlexso.co.za](mailto:compliance@inlexso.co.za)

#### 7.2. Right to have Personal Information Amended and/ or Deleted

You have the right to ask Us to update, correct or delete Your Personal Information.

Such a request should be made in the prescribed form attached as Annexure 5 of Our Manual.

#### 7.3. The Right to Object

You have the right, at any time, to object to the Processing of Your Personal Information.

The objection should be made in the prescribed form in Annexure 4 of Our Manual, subject to exceptions contained in POPIA.

### **8. RETENTION OF RECORDS**

All Records pertaining to this Statement will be retained in accordance with inlexso's Guide on Records Retention.

### **9. POPIA COMPLAINTS**

Please submit Your POPIA complaints via email to the Information Officer at: [compliance@inlexso.co.za](mailto:compliance@inlexso.co.za). Submissions should be made on the prescribed form set out in Annexure 1 of this Statement.

**ANNEXURE 1: POPIA COMPLAINT FORM**

<b>POPIA COMPLAINT FORM</b>	
Please submit your complaint to the Information Officer:	
<b>Details of Data Subject</b>	
Name & Surname	
Contact Number	
Email Address	

<p>When we are unable to resolve your complaint, to your satisfaction you have the right to complaint to the Information Regulator.</p> <p>The Information Regulator: Ms Mmamoroke Mphelo</p> <p>Physical Address: SALU Building, 316 Thabo Sehume Street, Pretoria</p> <p>Email: <a href="mailto:inforreg@justice.gov.za">inforreg@justice.gov.za</a></p> <p>Website: <a href="http://www.justice.gov.za/index.html">http://www.justice.gov.za/index.html</a></p>	
<b>Particulars of Complaint</b>	
Name & Surname	
Identity Number	
Postal Address	
Contact number(s):	
E-mail address:	
<b>Details of Complaint</b>	
<b>Desired Outcome</b>	
<b>Signature</b>	
Signed:	
Date:	