



Protection of Personal Information Act of 2013, No 4* – Privacy Policy

(*henceforth called the Act).

1. Introduction

As a company, I-Rigging Solutions (PTY) Ltd respects and protects the personal information and privacy of others.

This Privacy Policy relates to “personal information” which is any information (including an opinion) about an identified or identifiable person and/or juristic person and extends to any information where an individual can be identified directly or indirectly, in particular by reference to an identifier (for example, a name or email address).

The policy explains how I-Rigging Solutions (PTY) Ltd collects, manages, and utilises personal information, and how individuals can exercise privacy rights.

2. Obligations of the responsible party

I-Rigging Solutions (PTY) Ltd collects, manages and utilises personal information in accordance with the [Protection of Personal Information Act of 2013](#). I-Rigging Solutions (PTY) Ltd, in its course of normal business operations, holds and processes certain types of requisite *personal information* pertaining to employees, independent contractors, vendors, suppliers, service providers and clients – all of them being *data subjects*. In terms of the Act, I-Rigging Solutions is a *responsible party*.

The type of personal information which is processed is governed by various statutory- and sector requirements to which the company complies. To fulfil some of its statutory obligations, the responsible party may appoint and mandate operators to assist with, for instance, bookkeeping. Appointed operators may be overseas, necessitating transborder information flow. Any appointed operator is contractually bound to the privacy- and data management policies of I-Rigging Solutions (PTY) Ltd.

3. Categories of personal information held by responsible party

The categories of personal information held and processed as part of normal business operations of the responsible party are listed in the responsible party’s PAIA manual, accessible on www.i-rigging.com.

4. Scope of processing of (special) personal information by the responsible party and operator

The responsible party and its operator(s) may, as part of fulfilling the responsible party’s legal duties and thus normal business operations:

- i) Receive, send, consult, archive, delete and back up emails;
- ii) Receive, send, consult, archive, delete and back up electronic messages such as those on messaging platforms;
- iii) Receive, send, consult, file, update, organise, collate, share, save, delete and back up electronic records;
- iv) File, consult, update, organise, collate, store and destroy hardcopy records;
- v) Utilize data processing software (such as accounting and payroll programs).



5. Protection of (special) personal information: responsible party's processing policy

The responsible party (and its operator(s) where applicable), process all (special) personal information in line with the 8 lawful conditions of processing outlined in chapter 3 of the Act. In summary, the processing policy of the responsible party is as follows:

- i) Personal information is gathered:
 - Directly from the data subject as far as possible.
 - Only for well-defined, explicit, lawful purposes communicated to the data subject and determined by
 - legal- and sectoral requirements affecting the company's normal business operations; and
 - management and quality control principles adopted by the company.
 - With explicit, informed, voluntary consent of the data subject.

- ii) Gathered personal information is:
 - Accurate, complete, and relevant.
 - Not excessive (i.e., only the information which is really needed for the well-defined, explicit, lawful purposes is gathered).
 - Not re-used for purposes other than what it has been gathered for initially, transparently and with the data subject's consent.
 - Not shared with anyone outside the responsible party unless required to do so by law. Information which is defined as restricted or confidential is managed in accordance with additional document / data access and -controls.
 - Kept only for as long as required in accordance with
 - legal- and sectoral requirements affecting the company's normal business operations; and
 - management and quality control principles adopted by the company.
 - Destroyed in such a manner as to render it unable to be re-identified once over its defined retention period.
 - Kept securely, with appropriate technical, procedural and organisational measures in place to prevent
 - loss of, damage to or unauthorised destruction of (special) personal information; and
 - unlawful access to or processing of (special) personal information.

- iii) The data subject is informed of:
 - Who the responsible party is.
 - The purpose of the gathering of specified info.
 - Right to access, update and correct the information on record.
 - Right to withdraw consent and its resulting implications.

- iv) The data subject can at any time contact the responsible party in writing to:
 - Object to the processing of (special) personal information using [Form 1, pertaining to Regulation 2](#).
 - Request a copy of the personal information held using [Form C issued by the Information Regulator](#).
 - Verify correctness of the personal information held.
 - Inform the company regarding changes or updates to the data held on the subject using [Form 2, pertaining to Regulation 3](#).



- Lodge a question or concern.

The responsible party will review and respond to raised questions, concerns, or objections as soon as possible, generally within 30 days' of receiving it. If the data subject is not satisfied with the responsible party's response, a complaint can be lodged with the Information Regulator (<https://www.justice.gov.za/infoereg/contact.html>; email: complainants.ir@justice.gov.za).

The responsible party's PAIA manual should be consulted on the company website for details regarding access request fees and ground on which access to information may be denied.

Oversight on the consistent implementation of the lawful conditions of processing rests with the responsible party's duly appointed information officer (Jaco van Niekerk) and his deputy (Gela Tölken). All contact details may be found on the I-Rigging Solutions (PTY) Ltd website (www.i-rigging.com).

6. Policy review and updates

I-Rigging Solutions (PTY) Ltd will review this policy periodically and update it from time to time, or when relevant regulatory changes occur. Please visit the I-Rigging Solutions (PTY) Ltd website (www.i-rigging.com) to obtain a copy of the latest version at any time.

(version 0, 30-06-2021)