

FINCONSULT (PTY) LTD

PROTECTION OF PERSONAL INFORMATION (POPIA) POLICY

Document Version: 1.0

Effective Date: 01/10/2023

Approved By: Neil Harvey

Next Review Date: Annually

1. PURPOSE

Finconsult (Pty) Ltd (“the Company” or “the Firm”) is committed to protecting the privacy and confidentiality of personal information in accordance with the **Protection of Personal Information Act, 4 of 2013 (POPIA)**.

This Policy aims to:

- Ensure that personal information is processed lawfully and transparently;
 - Protect the rights of data subjects;
 - Establish internal controls to safeguard personal information;
 - Define roles and responsibilities relating to data protection; and
 - Promote a culture of privacy and accountability within the Firm.
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2. SCOPE

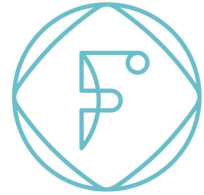
This Policy applies to:

- All directors, employees, contractors, trainees, and consultants of Finconsult (Pty) Ltd;
 - All personal information processed in the course of business operations;
 - All business functions, including accounting, taxation, payroll, advisory, and internal administration.
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3. DEFINITIONS

For purposes of this Policy:

- **Personal Information:** Information relating to an identifiable natural or juristic person.
 - **Data Subject:** The individual or entity to whom the information relates.
 - **Processing:** The collection, storage, use, dissemination, or destruction of personal information.
 - **Responsible Party:** Finconsult (Pty) Ltd, as the entity determining the purpose of processing.
 - **Operator:** A third party processing personal information on behalf of the Firm.
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4. POLICY PRINCIPLES

Finconsult (Pty) Ltd adheres to the following POPIA principles:

4.1 Accountability

The Firm is responsible for ensuring compliance with POPIA.

4.2 Processing Limitation

Personal information must be processed lawfully, minimally, and only when justified.

4.3 Purpose Specification

Information must be collected for a specific, lawful purpose.

4.4 Further Processing Limitation

Information must not be processed further in a manner incompatible with the original purpose.

4.5 Information Quality

Information must be accurate, complete, and updated where necessary.

4.6 Openness

The Firm must be transparent about how personal information is processed.

4.7 Security Safeguards

Appropriate measures must be taken to protect personal information.

4.8 Data Subject Participation

Data subjects must be allowed to access and correct their personal information.

5. INFORMATION OFFICER

Information Officer: Neil Harvey

Position: Director

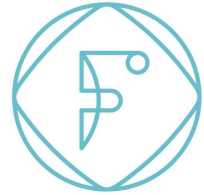
Email: neil@fnc.co.za

Contact Number: 011 432 1513

Responsibilities:

The Information Officer shall:

- Ensure compliance with POPIA;
 - Handle data subject requests and complaints;
 - Monitor data protection practices;
 - Manage security incidents and breaches;
 - Ensure staff training and awareness;
 - Maintain privacy documentation and compliance records.
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6. PERSONAL INFORMATION PROCESSED

6.1 Client Information

The Firm processes the following:

- Identity numbers and company registration details
- Contact details
- Financial records
- Banking details
- Tax and SARS-related information
- Payroll data

6.2 Employee Information

- Personal identification and contact details
- Employment and payroll records
- Tax information
- Performance and HR data

6.3 Supplier Information

- Contact details
- Banking information
- Contracts and invoices

7. LAWFUL BASIS FOR PROCESSING

Finconsult (Pty) Ltd processes personal information where:

- It is necessary to perform a contract/agreed upon service.
- Required by law (e.g., SARS reporting);
- Consent has been obtained where required;
- Legitimate business interests exist;
- It protects the interests of the data subject.

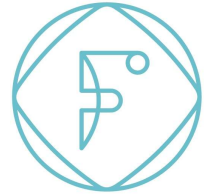
8. COLLECTION OF PERSONAL INFORMATION

Personal information is collected:

- Directly from clients, employees, and suppliers where possible;
- From authorised third parties where permitted.

The Firm will inform data subjects of:

- The purpose of collection;
 - Their rights;
 - Whether provision is mandatory or voluntary.
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9. USE AND DISCLOSURE

Personal information may be used and shared for:

- Accounting and tax services;
- Statutory and regulatory compliance (e.g., SARS, CIPC);
- Payroll and employment administration;
- Client communication;
- Legal and compliance obligations.

10. THIRD-PARTY OPERATORS

Where third parties process personal information, Finconsult will ensure:

- Written contracts are in place;
- Operators implement adequate security measures;
- Confidentiality is maintained.

Examples include:

- Cloud accounting systems
- Payroll platforms
- IT service providers

11. INFORMATION SECURITY

Finconsult (Pty) Ltd implements:

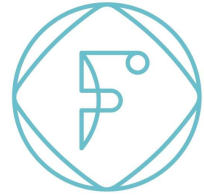
- Access controls and user permissions
- Secure password protocols
- Anti-virus and cybersecurity measures
- Secure document storage
- Data encryption where appropriate
- Secure disposal of records
- Staff confidentiality agreements

12. DATA SUBJECT RIGHTS

Data subjects have the right to:

- Access their personal information;
- Request correction or deletion;
- Object to processing;
- Withdraw consent where applicable;
- Lodge complaints.

Requests must be submitted to the Information Officer.



13. RETENTION AND DESTRUCTION

Personal information is retained:

- Only as long as legally or operationally required;
- In accordance with firm retention policies.

When no longer required, information is:

- Permanently deleted; or
 - Securely destroyed.
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14. DIRECT MARKETING

The Firm will:

- Obtain consent where required;
 - Provide opt-out options;
 - Respect data subject preferences.
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15. DATA BREACHES

In the event of a security breach:

- The incident must be reported immediately;
 - The Firm will investigate and mitigate harm;
 - The Information Regulator and affected individuals will be notified where required.
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16. CROSS-BORDER TRANSFERS

Personal information may only be transferred outside South Africa where:

- Adequate protection exists; or
 - Consent has been obtained; or
 - It is necessary to perform a contract/agreed upon service.
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17. CONFIDENTIALITY

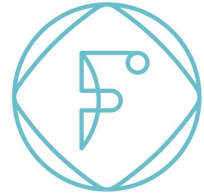
All employees and contractors must:

- Maintain confidentiality of personal information;
 - Only access information on a need-to-know basis;
 - Continue confidentiality obligations after termination.
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18. TRAINING AND AWARENESS

The Firm will ensure:

- Regular POPIA training;
 - Awareness of privacy obligations;
 - Continuous compliance monitoring.
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19. NON-COMPLIANCE

Failure to comply with this Policy may result in:

- Disciplinary action;
- Termination of employment or contracts;
- Legal consequences.

20. RELATED DOCUMENTS

This Policy should be read together with:

- PAIA Manual
- Information Security Policy
- Record Retention Schedule
- Incident Response Procedure

21. COMPLAINTS

Internal complaints should be addressed to:

Information Officer:

Finconsult (Pty) Ltd

neil@fnc.co.za – Neil Harvey

External complaints may be directed to the **Information Regulator of South Africa**.

22. POLICY REVIEW

This Policy shall be reviewed:

- Annually; or
- When there are significant legal or operational changes.

23. APPROVAL

Approved by:

Name: Neil Harvey

Position: Director

Signature: 

Date: 30/10/2023