

Privacy and Security Policy

I T S Computer Systems (Pty) Ltd

1. Introduction

I T S Computer Systems (Pty) Ltd ("the Company") is committed to protecting the privacy and data integrity of our clients, partners, and employees. This policy outlines how we process personal information in accordance with the South African Protection of Personal Information Act (POPIA). All data processing activities are managed through our office in Montague Gardens, Cape Town.

2. Information We Collect

We collect personal information necessary for providing ICT services, including:

- **Identity & Contact Data:** Names, registration numbers, physical addresses, and email.
- **Financial Data:** Banking and tax information for billing and SARS compliance.
- **Technical Data:** IP addresses and system logs collected during technical support or network auditing.

3. Secure Compliance of Information Storage

We adhere to the "Security Safeguards" condition of POPIA by maintaining a rigorous technical and physical environment.

3.1 Digital Storage & Data Protection

- **Encryption at Rest:** Personal information stored on our servers and workstations is protected using industry-standard encryption protocols to prevent unauthorized access.
- **Encryption in Transit:** Data moving between our office and authorized cloud environments is transmitted via secure, encrypted communication channels.
- **Immutable Backups:** We maintain off-site, "immutable" backups to guard against ransomware. These backups are designed so that data cannot be altered or deleted for a specified period.

3.2 Access & Identity Management

- **Strict Access Control:** We follow the "least privilege" principle. Access to storage environments is restricted to authorized personnel based on their specific job functions.

- **Multi-Factor Authentication (MFA):** All administrative and remote access to our infrastructure requires MFA to verify the identity of the user.

3.3 Physical Security & Hardware Disposal

- **On-Site Security:** Our hardware is housed in a restricted-access server room at our Montague Gardens premises. The facility is protected by physical barriers, electronic monitoring, and 24/7 manned security to ensure continuous physical oversight.
- **Secure Disposal:** When storage media reaches the end of its life, it is either physically destroyed or wiped using secure digital sanitization methods.

4. Retention and Secure Destruction

In compliance with Section 14 of POPIA, we do not retain personal information longer than necessary:

Data Category	Retention Period	Legal Basis
Financial/Tax Records	5 Years	Companies Act / Tax Administration Act
Client Contracts	5 Years post-termination	Legal/Auditing requirements
CCTV Footage	30 Days	Safety and security monitoring

5. Your Rights as a Data Subject

In accordance with POPIA, you have the following rights regarding your personal information:

- **5.1 Confirmation of Information:** You may at any time request us to confirm what personal information we have relating to you and by whom it was accessed. We may charge a fee for providing the record of access.
- **5.2 Update or Deletion:** You may ask us to update or delete your information or to refrain from using it.
 - **Note:** We may refuse to delete information if such deletion would compromise an obligation in law that is imposed on us and which requires us to keep the information for a determined period or would otherwise impact on our ability to render the services in the company. Should any damage arise to you from your request in these circumstances, you

indemnify us against any claim for damages that may follow as a result
hereof.

- **5.3 Electronic Marketing:** As part of our service rendering, we may provide newsletters, mailers and other advertisements to customers. You may unsubscribe from any of our electronic material by simply clicking on the unsubscribe option provided. ²In that event, we will remove your details from the sending list.
- **5.4 Refusal of Deletion:** You may otherwise ask us to delete any information we have about you, but we might refuse if we need your personal information to protect our rights, or if the law obliges us to keep it. In these circumstances, if we refuse to delete your personal information, we will advise you of the fact that we did not delete the personal information and provide you with a reason⁴ therefore.
- **5.5 Usage Inquiry:** You may enquire from us about your personal information that we have, and how, if at all, it was used.
- **5.6 Assistance:** For assistance to exercise your rights as explained in this paragraph, please contact our Information Officer.

6. Security Breach Management

In the event of a security compromise or "data breach," the Company follows a strict incident response protocol as required by Section 22 of POPIA.

6.1 Identification and Investigation

If there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorized person, we will immediately contain the breach and conduct an investigation to determine the scope of the compromise.

6.2 Notification Requirements

We will notify the Information Regulator and the affected Data Subjects as soon as reasonably possible. The notification will include a description of the possible consequences and recommendations for measures the data subject should take to mitigate potential risks.

7. Changes to This Privacy Policy

I T S Computer Systems (Pty) Ltd reserves the right to update this policy at any time to reflect changes in our practices, technology, or legal requirements.

7.1 Notification

When we make material changes to this policy, we will notify you by updating the "Effective Date" at the bottom of this document. Where appropriate, we may also post a notice on our website or contact you directly via email. We encourage you to review this policy periodically to stay informed about how we are protecting your information.

7.2 Acceptance

Your continued use of our services, website, or business relationship following the publication of any changes to this policy constitutes your acknowledgment and acceptance of the revised terms.

8. Contact Details

I T S Computer Systems (Pty) Ltd

Address: Unit 1, Prestige Business Park, Democracy Way, Montague Gardens, 7441

Phone: +27 (21) 551 1801

Email: craig@itscomputers.co.za

Effective Date: January 6, 2025