

# Privacy Policy

## 1. Introduction

At BCompliant cc (further referred to as *BCompliant* or *we* or *us* or *our*), we respect your privacy and we will protect your personal information and keep it confidential. This private policy explains how we will process and protect your personal information. Note that this policy may be reviewed and updated from time to time. The latest version of this policy is available on request. In order for us to help you and to deliver a service to you, you will have to share personal information with us. Your personal information is received at BCompliant via a website enquiry that you made, an email that you sent to BCompliant or a completed Registration Form for a training course that you would like to attend, that was submitted via email to BCompliant.

This policy applies to all external parties whom interact with BCompliant and vice versa, including but not limited to potential individual clients, individual clients, representatives of potential client organisations, representatives of client organisations and visitors to our office.

## 2. Definitions

- 2.1 **Cookie:** a small file that is placed on your device when you visit a website. In this policy a *cookie* includes analogous technologies such as web beacons and clear Graphic Interchange Format files (GIFs)
- 2.2 **Data subject:** Refers to any individual person who can be identified, directly or indirectly, via an identifier such as a name, an ID number, location data, or via factors specific to the person's physical, physiological, genetic, mental, economic, cultural or social identity. Data subjects include but may not be limited to: clients; potential clients; representatives of potential client organisation; or representatives of client organisations.
- 2.3 **Personal information:** information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
- 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;
  - information relating to the education or the medical, financial, criminal or employment history of the person;
  - any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
  - the biometric information of the person;
  - the personal opinions, views or preferences of the person;
  - 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;
  - the views or opinions of another individual about the person; and 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 information about the person
- 2.4 **POPIA:** the Protection of Personal Information Act, Act No. 4 of 2013
- 2.5 **Process, Processing or Processed** includes collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, or using information, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or

destruction.

2.6 **Sensitive Personal Information:** Personal information about race or ethnicity, national identification number or any other information that may be deemed to be sensitive under applicable law

2.7 **Service Provider:** third party providers of various services whom we engage including but not limited to providers of information technology (IT), accounting or auditing services, taxation consultant and professional advisors.

2.8 **Website:** any website operated or maintained by us or on our behalf

### 3. Consent to process and retain personal information

By providing us with your personal information, you:

- Agree to this policy and authorise BCompliant to process such information as set out herein
- Authorise BCompliant employees and service providers (as required) to process your personal information for the purposes stated in this policy

### 4. The personal information that BCompliant collects:

- Will not be used for any other purpose than that set out in this policy and BCompliant will endeavour to protect your personal information that is in our possession from unauthorised alteration, loss, disclosure or access
- When you make an enquiry via the BCompliant website or via email, you provide personal information to BCompliant in order for us to respond to your enquiry and/or to deliver a service to you
- To send you a quote or to invoice you, some of your publicly available personal information may be obtained from the Internet (where applicable)
- Personal information include but may not be limited to:
  - Personal information: your name and surname; Health or Allied Professional Council of South Africa Registration Number
  - Contact details: email address; physical address; correspondence address; telephone number
  - Attendance Registers: details of training courses that you attended that BCompliant hosted
  - Payment details: billing address; bank account number; SWIFT details; IBAN details, payment amount; VAT number
  - Data relating to your visits to our website: your device type; operating system; browser type; browser settings; IP address; language settings; date and times of connecting to a website; other technical communications information
  - Demographic information of BCompliant employees: gender; date of birth/age; nationality and language preference
  - Identifier information of BCompliant employees: passport or national identity number
- We may create personal information about you such as records of your communications and interactions with us, including but not limited to your attendance at training courses and talks, interviews in the course of applying for a job with us and other mailings and interactions with you.

## **5. Sensitive Personal Information**

Where we need to process any sensitive personal information, we will do so in the ordinary course of our business for legitimate purpose and in accordance with applicable law.

## **6. How BCompliant processes personal information**

At BCompliant your personal information is used to respond to your enquiry made via the website or via email and to provide you with the required information related to your enquiry. Therefore, BCompliant will process personal information of data subjects in the ordinary course of the business of providing training and clinical quality assurance services. We will primarily use your personal information only for the purpose for which it was originally provided by you, or obtained by BCompliant.

Personal information of data subjects will only be used for a secondary purpose if such purpose constitutes a legitimate interest and is closely aligned with the original or primary purpose for which the data subject's personal information was collected. Refer to section 8 below.

## **7. Use of cookies**

"Cookies" are used on the BCompliant website. "Cookies" enable us to improve your future visits to the BCompliant website as well as to provide you with a more user-friendly experience. You can read more about our [Cookie Policy](#).

## **8. Disclosure of personal information**

We are not in the business of selling personal information and therefore we will not disclose your personal information to anyone except as stipulated in this policy.

Your personal information may be disclosed to representatives of potential client organisations (your employer or future employer), or representatives of client organisations (your employer or future employer) who is coordinating training courses that you are required to attend and who are responsible for payment of the course fee/s. There may be situations where the law requires BCompliant to disclose your personal information. We may also disclose your personal information for legitimate business purposes, in accordance with applicable laws and subject to applicable professional and regulatory requirements regarding confidentiality. In addition, we may disclose your personal information (to):

- If required by law
- Legal or regulatory authorities as required by you or representatives of potential client organisations (your employer or future employer), or representatives of client organisations (your employer or future employer)
- Third party service providers of BCompliant
- Use appropriate measures to protect the confidentiality and security of such personal information

## **9. International transfer of personal information**

We may transfer your personal information to recipients outside of the Republic of South Africa, if required for legitimate business purposes, provided that:

the country to which the data is transferred has adopted a law that provides for an adequate level of protection like POPIA, the third party undertakes to abide by the applicable data protection legislation and if transfer of your personal information is necessary to provide the services that BCompliant is required to do.

## **10. Data security of personal information**

- 10.1 BCompliant takes all reasonable and appropriate measures to keep your personal information that is in our possession secure against accidental or unlawful destruction, loss, alteration, unauthorised disclosure and unauthorised access in accordance with applicable law. For example, we encrypt our laptops and our phones. We back-up your personal information securely which you provided to BCompliant for disaster recovery purposes.
- 10.2 We implement appropriate technical and organisational security measures to protect your personal information
- 10.3 Where there are reasonable grounds to believe that your personal information, that is in our possession, has been accessed or obtained by any unauthorised person, we will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.
- 10.4 Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your personal information that is in our possession, we cannot guarantee the security of any information transmitted using the internet and we cannot be held liable for any loss of privacy occurring during the course of such transmission.

## **11. Email inspection**

We will inspect all emails you contact us with, via the email address that we provide on this website. We do this to check for viruses, and reserve the right to monitor and inspect all material and information transmitted over the system. We may also monitor whether you read emails that we send you.

## **12. Data accuracy and correction of personal information**

The personal information provided to BCompliant should be accurate, complete and up-to-date. Should personal information change the onus is on the provider of such information to notify BCompliant of the change via email at [retha@bcompliantcc.co.za](mailto:retha@bcompliantcc.co.za)

## **13. Data minimization**

BCompliant will restrict the collection and processing of personal information to the absolute minimal data which is required for the fulfilment of the primary purpose and applicable legitimate purpose for which it was collected.

## **14. Data retention**

BCompliant shall only retain and store personal information for the period for which the data is required to serve its primary purpose or a legitimate interest or for the period required to comply with an applicable legal requirement, whichever is longer.

## **15. Destruction of personal information**

All personal information provided to BCompliant will be destroyed in a secure manner regardless of the media via which the information was submitted. The Information Officer at BCompliant is responsible for the secure destruction of the personal information.

## **16. Your legal rights**

You have rights under the South African and other laws to have access to your personal information and to ask us to rectify, erase and restrict use of your personal information. You also have rights to object to your personal information being used, to ask for the transfer of personal information you have made available to us and to withdraw consent to the use of your personal information.

## **17. BCompliant cc contact details**

You may contact us at:

The Information Officer

BCompliant cc

Attention: Ms. Retha Britz

[retha@bcompliantcc.co.za](mailto:retha@bcompliantcc.co.za)