

OUR PRIVACY NOTICE

1. DEFINITIONS

1.1 The Payroll Authors Group of South Africa (PAGSA)

PAGSA is a Responsible Party as envisaged in the Protection of Personal Information Act 4 of 2013 (POPIA), and where reference is made to PAGSA, this may include reference to other companies within the PAGSA group of companies in South Africa (hereinafter referred to as "The Company" / "us" / "we" / "ours"). For access to further information, refer to our PAIA Manual, available on The Company's website in this regard.

1.2 Data Subject

Means the person/entity to whom Personal Information relates.

1.3 Information Officer

Means the chief executive officer, or equivalent officer, of The Company or the person who is acting as such and whose information is set out below.

1.4 PAIA Manual

Means the manual that sets out the process for accessing information as envisaged by sections 14 and 51 of the Promotion of Access to Information Act 2 of 2002 (PAIA) and is available on The Company's website.

1.5 Personal Information

Means any information relating to an identifiable, living, natural person, and, where applicable, an identifiable, existing juristic person. It is information or items of information that could identify that natural or juristic person, either directly (e.g., by name) or indirectly (e.g., an alternate / pseudonym, such as a nickname, etc.), and it includes things like, for example, an email address, a phone number, a home address, a system username, user-generated content, and financial information.

2. INTRODUCTION AND PURPOSE OF THIS NOTICE

We recognise our Data Subjects' rights to privacy and are committed to protecting and controlling the use of the Personal Information that we collect in accordance with the regulatory requirements of the jurisdictions in which we operate.

In accordance with the data privacy laws, and because our clients' privacy is important to us, we request that you take careful note of this Privacy Notice, as it describes how we process Personal Information, including the receipt, collection, use, disclosure, sharing, retention, and, importantly, the protection of Personal Information in accordance with the provisions of POPIA.

3. WHO WE ARE

The Payroll Authors Group of South Africa was established in 1989 and is an appropriately constituted NPO. It has the active support of SARS, which, at the inception of the PAGSA, coined the term "Payroll Author" for companies that develop, implement, and support computerised payroll applications.

The PAGSA focuses on employment-related legislation and engages with statutory bodies whose legislation and operations requirements impact employers and their payroll systems.

A vitally important part of the PAGSA's activities is to provide input to help shape future requirements and make the authorities aware of the perspectives and problems that employers and systems face. These discussions have resolved many problems at an early stage of implementation and have made it possible for payroll systems to comply with what may have otherwise been impractical requirements.

PAGSA member companies provide payroll applications, services, and support to virtually all companies in South Africa (and beyond). Their payroll applications calculate and administer the withholding of employment taxes and levies for thousands of employers and, in turn, millions of employees.

The PAGSA is today acknowledged as an essential partner by all statutory bodies to whom employers pay the various taxes, levies, and contributions required by South African law.

4. APPLICATION OF THE PRIVACY NOTICE

This Privacy Notice applies to The Company, as defined above, including all our employees, as well as third parties who provide products and services to us, and covers Personal Information collected and managed by us. It also applies to a Data Subject when that Data Subject visits our website or uses any of the products and services available either through our website or directly from ourselves.

5. PRINCIPLES FOR THE COLLECTION AND PROCESSING OF PERSONAL INFORMATION

5.1 Collection, processing, and purpose

We will only collect Personal Information when it is necessary to comply with applicable legal obligations, or when such processing is necessary for the performance of a contract or pre-contractual procedures.

We may also process information that is of legitimate interest to us, provided that in each case our interest is in accordance with applicable law and the rights of the Data Subject.

When none of the other lawful processing conditions supports the data processing operation, we will only process Personal Information if we have obtained the consent of the Data Subject to process such Personal Information for specific, explicit, and legitimate purposes.

We will only use Personal Information we have gathered for the fulfilment of the specific purposes for which it was obtained or for other lawful processing.

5.2 Accuracy

We will take all practical and reasonable steps to ensure that the Personal Information that we process is accurate, complete, and up-to-date.

5.3 Openness

We are committed to openness regarding our policies and our practises with regards to the handling of Personal Information.

We would also like to point you to our Disclaimer, which is on our website, for the terms pertaining to the use of our website.

5.4 Security

We will ensure that appropriate security safeguards are in implemented to protect Personal Information from loss, unauthorised access, destruction, use, modification or disclosure.

5.5 Transfers and sharing

We will only disclose Personal Information for the fulfilment of the specific purposes for which it was obtained or for other lawful processing.

Under no circumstances do we transfer or share Personal Information, outside the conditions described above or sell Personal Information to third parties.

5.6 Retention

We will retain Personal Information for as long as is necessary for the purposes for which it was collected.

In some cases, data retention may occur for longer periods, as prescribed and as required by applicable laws for the retention of such data.

5.7 Access

The Data Subject may request a copy of their Personal Information from us and, where required, instruct us to make specific changes to correct all of this data, or parts of this data, or to permanently delete this data, in accordance with local regulations.

6. INFORMATION ABOUT OTHERS

If the Data Subject provides us with Personal Information about another person or entity, the Data Subject is then responsible for ensuring that it complies with any obligations and consent obligations under applicable data protection laws in relation to providing such information to us. In so far as required by applicable data protection laws, the Data Subject must ensure that it has provided the required notices and obtained the other person's or entity's consent to provide us

with this Personal Information and that the Data Subject explains to the other person or entity how we collect, use, disclose, and retain their Personal Information or ensure they have been supplied with, or pointed to, our Privacy Notice.

7. FURTHER PROCESSING AND MARKETING

We do make use of various third-party providers who, where applicable, provide various products and services on our behalf and under our authority and guidance. We carefully select these third-party service providers and will, from time to time, further process a Data Subject's Personal Information for the purpose of informing and providing the Data Subject with access to such third party products and services that could be of benefit to the Data Subject. We may in specific instances share a Data Subject's information with our affiliates and / or subsidiary companies so that they may contact the Data Subject with information about their products or services which may be of benefit or interest to the Data Subject.

Should the Data Subject not want to receive communications pertaining to these products and services provided by ourselves or by our appointed third-party service providers, the Data Subject may opt out of this communication by emailing a completed **Form 1** which is included under the Annexures to this document to admin@pagsa.org.za.

8. CONSENT

By providing us with its Personal Information, the Data Subject consents to our processing or further processing the provided Personal Information as and when required, provided that we ensure that such processing is done in a lawful and legitimate manner and in line with this Privacy Notice and applicable legislation.

9. RIGHTS OF THE DATA SUBJECT

Whilst the provision of Personal Information is voluntary, withdrawing consent or choosing to delete some types of Personal Information by the Data Subject, may prevent us from supplying certain products and services to the Data Subject, or responding to queries as a prospective employee or supplier or business partner. In order to better protect and safeguard Personal Information, we reserve the right to verify the identity of a Data Subject before granting access to or making changes to Personal Information.

Rights	Meaning
Information	The Data Subject has the right to be provided with clear, transparent, and easily understandable information about how we use Personal Information, and what the Data Subject's rights are.
Access	The Data Subject has a right to access and to receive a copy of any Personal Information

	we hold about them (this could, in specific instances, be subject to certain restrictions). A reasonable fee may be charged for providing such access, but only where permitted by law.
Rectification	<p>The Data Subject has the right to have Personal Information rectified if it is incorrect or outdated and/or completed if it is incomplete.</p> <p>Form 2 contained in the Annexures must be used for the correction of Personal Information. It must be emailed to admin@pagasa.org.za</p>
To be forgotten / deleted permanently	The Data Subject has the right to have Personal Information deleted. This is subject to our having legal or legitimate grounds for retaining the Personal Information.
Direct marketing	<p>The Data Subject may unsubscribe or opt out of direct marketing communication at any time.</p> <p>Form 1 contained in the Annexures must be used for the correction of Personal Information. It must be emailed to admin@pagasa.org.za</p>
Withdrawal of consent	<p>The Data Subject may withdraw consent to our processing of Personal Information when such processing is based on consent. Where consent is withdrawn, the lawfulness of processing prior to withdrawal is not affected.</p> <p>Form 1 contained in the Annexures must be used for the correction of Personal Information. It must be emailed to admin@pagasa.org.za</p>
Objection to processing	The Data Subject may object to the processing of Personal Information when

	<p>such processing is based on the legitimate interests pursued by our data controller, such as the:</p> <ul style="list-style-type: none"> - Enhancement of our communication with the Data Subject. - Proper administration of our website. - Risk management. - Protection of legal rights. <p>Form 1 contained in the Annexures must be used for the correction of Personal Information. It must be emailed to admin@pagsa.org.za</p>
Lodge a complaint	The Data Subject has the right to contact the relevant data protection authority to lodge a complaint against our data protection and privacy practices.
Data portability	<p>The Data Subject has the right to move, copy or transfer Personal Information from our technology environment/database to another. This only applies to Personal Information that the Data Subject:</p> <ul style="list-style-type: none"> - has provided us, - where processing is in accordance with a contract/agreement or explicit consent has been provided, - and the processing is carried out by any of our automated processes/methods
Restriction	<p>In circumstances that are limited by legislation, the Data Subject may restrict the processing of Personal Information, so that it can be stored, but not used or processed further, such as:</p> <ul style="list-style-type: none"> - inaccurate data contested by the Data Subject must be restricted until it can be properly verified and corrected. - processing is unlawful, but the Data Subject objects to us deleting the data.

	- we no longer require the Data Subject's data but the Data Subject requires that we continue to store the data for legitimate reasons.
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10. INFORMATION OFFICER

Data Subjects that have any queries or require further information regarding our data protection policies, our procedures or our POPIA policy may send an email to admin@pagsa.org.za.

Details of our Information Officer are available in our PAIA Manual.

11. COMPLAINTS

Data Subjects have the right to submit a complaint to the local supervisory authority if unsatisfied with the manner in which we handle the Data Subject's Personal Information.

Details of the Information Regulator in South Africa:

Physical Address	27 Stiemens Street
	Braamfontein
	Johannesburg
	2001
	2000
Postal Address	P.O. Box 31533
	Braamfontein
	Johannesburg
	2017
Complaints email	complaints.IR@justice.gov.za
Website	https://www.justice.gov.za/inforeg/index.html

12. CHANGES TO OUR PRIVACY NOTICE

We may change this Privacy Notice from time to time as our business needs change, and as appropriate legislation requires of us. We will do this without notice to the Data Subject, unless the changes we make are of a material nature. The most updated version of this information will always be easily accessible on The Company's website, which we recommend Data Subjects visit regularly.

13. ANNEXURES (Forms)

Please refer to next pages for all POPI-related forms.

FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION (IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013))

Part A	Details of Data Subject
Name & Surname or registered name of Data Subject	
ID number (or other identifier – eg passport no.)	
Address (Physical or Postal)	
Contact Number	
Email	
Part B	Details of The Company
Name & Surname or registered name of The Company	
Address (Physical, Business or Postal)	
Contact Number	
Email	
Part C	Reason for objection

Signed at on this day of
.....20.....

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Signature of data subject/ designated person

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION

(IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO 4 OF 2013))

Please mark the appropriate column with an "x".

I am requesting:

	The correction or deletion of the personal information about the data subject which is in possession of the company / entity or under the control of The Company.
	The destruction or deletion of a record of personal information about the data subject which is in possession of The Company or under the control of the The Company and who is no longer authorised to retain the record of information

Part A	Details of Data Subject
Name & Surname or registered name of the Data Subject	
ID number (or other identifier – eg passport no.)	
Address (Physical or Postal)	
Contact Number	
Email	
Part B	Details of The Company
Name & Surname or registered name of The Company	
Address (Physical, Business or Postal)	
Contact Number	
Email	

Part C	Please supply details of information about the Data Subject to be corrected / deleted / destructed / destroyed

Part D	Please supply reasons for the information about the Data Subject be corrected / deleted / destructed / destroyed

Signed at on this day of
.....20.....

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Signature of data subject/ designated person