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QA-PLC-001 Privacy Policy Rev 1.1

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Distribution:

All Staff
Contractors
Third Parties

Information:

1. Introduction

Westech Systems (Pty) Ltd ("Westech Systems", "we", "us", "our") is committed to protecting the privacy and personal information of our clients, employees, and stakeholders in accordance with the Protection of Personal Information Act (POPIA), ISO 27001:2022, and other applicable privacy laws.

Contact Information:

- Company: Westech Systems (Pty) Ltd
- Registration: 2017/425539/07
- Address: 9 Simba Road, Sunninghill Place, Block C Ground Floor, Sunninghill, Johannesburg, 2191
- Quality Assurance Officer Contact: Wessel Venter
- Phone: +27 11 519 4900

2. Information We Collect

2.1 Client Information

- Business contact details: Names, job titles, email addresses, phone numbers
- Technical information: System configurations, network details, access credentials
- Service data: Usage patterns, performance metrics, support interactions
- Financial information: Billing details, payment information, invoicing data
- Communications: Emails, support tickets, meeting records, service requests

2.2 Employee Information

- **Personal details:** Identity documents, contact information, emergency contacts
- **Employment data:** Contracts, performance records, training certificates, payroll information
- **System access:** Login credentials, access logs, security clearances
- **Health and safety:** Medical certificates, incident reports (where applicable)

2.3 Website and Marketing Information

- **Website visitors:** IP addresses, browser information, page views, cookies
- **Marketing contacts:** Business contact details from leads and prospects
- **Event participants:** Registration details, attendance records, feedback

3. How We Collect Information

3.1 Direct Collection

- Service contracts and agreements
- Contact forms and registration processes

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- Direct communications (email, phone, meetings)
- Support requests and service interactions
- Employment applications and processes

3.2 Automatic Collection

- System monitoring and logging
- Website analytics and cookies
- Security monitoring systems
- Performance monitoring tools
- Backup and disaster recovery systems

3.3 Third-Party Sources

- Business directories and public records
- Referrals from existing clients
- Vendor and supplier information
- Professional networks and associations
- Publicly available business information

4. Purposes Of Processing

4.1 Service Delivery

- Providing managed IT services and support
- Monitoring and maintaining client systems
- Incident response and problem resolution
- Performance reporting and optimization
- Service improvement and development

4.2 Business Operations

- Contract management and billing
- Communication with clients and stakeholders
- Compliance with legal and regulatory requirements
- Risk management and security monitoring
- Business planning and development

4.3 Legal and Regulatory Compliance

- POPIA and privacy law compliance
- Tax and financial reporting requirements
- Employment law obligations
- Industry regulatory requirements
- Legal proceedings and investigations

5. Legal Basis For Processing

We process personal information based on the following legal grounds:

5.1 Contractual Necessity

- Fulfilling service agreements and contracts
- Processing payments and billing
- Providing customer support and services
- Managing employment relationships

5.2 Legal Obligations

- Compliance with tax and financial regulations
- Employment law requirements
- Industry-specific regulatory obligations
- Court orders and legal proceedings

5.3 Legitimate Interests

- Business operations and administration
- Security monitoring and incident response

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- Service improvement and development
- Marketing to existing business contacts (where consent not required)

5.4 Consent

- Marketing communications to prospects
- Optional data collection activities
- Cookies and website analytics (where required)
- Special category personal information processing

6. Information Sharing

6.1 Internal Sharing

Information is shared internally only with employees who require access to perform their job functions, following the principle of least privilege and need-to-know basis.

6.2 Third-Party Service Providers

We may share information with approved vendors and service providers who assist in:

- Cloud hosting and infrastructure services
- Software applications and platforms
- Professional services (legal, accounting, auditing)
- Security services and monitoring
- Backup and disaster recovery services

All third-party processors are required to:

- Sign comprehensive data processing agreements
- Implement appropriate security measures
- Process information only for specified purposes
- Notify us of any security incidents
- Allow audits and compliance monitoring

6.3 Legal Disclosures

We may disclose information when required by law or to:

- Comply with legal proceedings or court orders
- Respond to lawful requests from authorities
- Protect our rights, property, or safety
- Investigate suspected fraud or security incidents
- Comply with regulatory requirements

6.4 Business Transfers

In the event of a merger, acquisition, or sale of business assets, personal information may be transferred as part of the business, subject to appropriate confidentiality and security protections.

7. International Transfers

7.1 Transfer Locations

Personal information may be transferred to and processed in countries outside South Africa, including:

- Cloud service provider data centres
- International vendor locations
- Client systems and offices globally

7.2 Transfer Safeguards

For transfers to countries without adequate data protection laws, we implement appropriate safeguards:

- Standard contractual clauses
- Binding corporate rules
- Adequacy decisions by regulatory authorities
- Specific consent where required
- Derogations for specific situations

8. Data Subject Rights

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Under POPIA and other applicable laws, you have the following rights:

8.1 Right of Access

- Request confirmation of personal information processing
- Obtain copies of your personal information
- Receive information about processing purposes and recipients
- Learn about retention periods and your rights

8.2 Right to Correction

- Request correction of inaccurate personal information
- Request completion of incomplete information
- Update outdated information
- Verify accuracy after corrections

8.3 Right to Deletion

- Request deletion when information is no longer necessary
- Withdraw consent where processing is based on consent
- Object to unlawful processing
- Request deletion after successful objection

8.4 Right to Restrict Processing

- Request restriction while accuracy is being verified
- Limit processing when it's unlawful but deletion is not wanted
- Restrict processing for legal claims
- Object to processing pending verification of legitimate grounds

8.5 Right to Object

- Object to processing based on legitimate interests
- Object to direct marketing communications
- Object to automated decision-making
- Object to profiling activities

8.6 Right to Data Portability

- Receive personal information in structured, commonly used format
- Transmit information to another data controller
- Request direct transmission where technically feasible

9. Exercising Your Rights

9.1 How to Submit Requests

Email: wessel@westech.co.za **Phone:** +27 11 519 4900 **Post:** Quality Assurance Officer, Westech Systems (Pty) Ltd, 9 Simba Road, Sunninghill Place, Block C Ground Floor Sunninghill, Johannesburg, 2191

9.2 Request Processing

- Response time: Within 30 days of receipt
- Verification: Identity verification may be required
- Format: Electronic format unless otherwise requested
- Fees: Generally free; reasonable fees for excessive requests
- Extensions: May be extended by 60 days for complex requests

9.3 Complaints Process

If you're not satisfied with our response:

1. Contact our Privacy Officer for internal resolution
2. Lodge a complaint with the Information Regulator of South Africa
3. Seek legal advice or court remedies as available

10. Data Retention

10.1 Retention Periods

- Client data: Duration of service relationship + 7 years

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- Employee data: 5 years after employment termination
- Financial records: 7 years (SARS requirement)
- Marketing data: Until consent withdrawn or 3 years of inactivity
- Legal documents: As required by applicable laws

10.2 Disposal Procedures

When retention periods expire, we securely dispose of information through:

- Secure deletion and overwriting for electronic data
- Cross-cut shredding for paper documents
- Physical destruction of storage media
- Certificate of destruction for sensitive information

11. Security Measures

11.1 Technical Safeguards

- Encryption of data in transit and at rest
- Multi-factor authentication and access controls
- Regular security updates and patch management
- Intrusion detection and prevention systems
- Secure backup and disaster recovery procedures

11.2 Organizational Safeguards

- Staff training on privacy and security
- Background checks for personnel
- Confidentiality agreements and codes of conduct
- Regular security audits and assessments
- Incident response and breach notification procedures

11.3 Physical Safeguards

- Secure facilities with access controls
- Surveillance and alarm systems
- Environmental controls and fire protection
- Secure disposal of physical documents
- Visitor management and escort procedures

12. Cookies And Website Tracking

12.1 Cookie Usage

Our website uses cookies for:

- Essential website functionality
- Performance and analytics
- Security and fraud prevention
- Personalization and preferences

12.2 Cookie Management

You can control cookies through:

- Browser settings and preferences
- Opt-out links in our cookie notice
- Third-party opt-out mechanisms
- Direct contact with our privacy team

13. Changes To This Policy

13.1 Policy Updates

We may update this privacy policy to:

- Reflect changes in our processing activities
- Comply with new legal requirements
- Improve clarity and transparency

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- Address new technologies and services

13.2 Notification of Changes

We will notify you of material changes through:

- Email notifications to registered contacts
- Prominent notices on our website
- Direct communication for significant changes
- Updated version dates and change logs

14. Enforcement:

Minor Violations (unintentional, low risk): Verbal warning, retraining

Moderate Violations (negligent, medium risk): Written warning

Severe Violations (intentional, high risk): Investigative disciplinary hearing to decide on suspension or termination as per the Disciplinary Code. Final written warning or termination to be decided once disciplinary process has been completed.

15. Contact Information

Quality Assurance Officer: Wessel Venter Email: wessel@westech.co.za Phone: +27 11 519 4900

Address: 9 Simba Road, Sunninghill Place, Block C Ground Floor, Sunninghill, Johannesburg, 2191

Information Regulator (Complaints): Website: www.justice.gov.za/inforeg/ Email: inforeg@justice.gov.za Phone: +27 12 406 4818

Policy Approved by:

Name: _____

Signed: W Venter

Date: _____

QA Manager

Name: _____

Signed: Massima Brandani

Date: _____

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