



# LUCIAN

BROAD SPECTRUM SYSTEMS AND CONSULTANCY

## 1. INTRODUCTION

### POPIA PRIVACY NOTICE

Lucian Systems Pty Ltd (“the company”) is committed to the adherence of all South African legislation, and as such, this privacy notice has been adopted as part of the Protection of Personal Information compliance framework, which is required by the Protection of Personal Information Act 4 of 2013 (**POPI Act**).

At the company, we respect the privacy of everyone who visits our websites, our social media platforms, or uses our online services. We would therefore like to inform you regarding the way we would use your personal information, and so we recommend that you read this Privacy Notice.

The POPI Act is distinguished from other similar pieces of legislation worldwide because the “personal information” as defined in the Act refers to “*ANY information RELATING TO AN IDENTIFIABLE, LIVING NATURAL PERSON OR JURISTIC PERSON*”. This means that there is not only a requirement to safeguard the personal information of an individual, but that of clients, stakeholders, and suppliers as well.

In terms of section 18 of the POPI Act, we are required to bring to your attention certain matters relating to the use of your personal information, which we set out below.

By interacting with the company websites and social media platforms, and providing your personal information to us, you acknowledge that you have read and understood this notice, and have agreed to the contents hereof. You furthermore authorise us to take any of the actions described herein insofar as your personal information is concerned.

## 2. DEFINITIONS

<b>Consent</b>	Means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
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<b>Data Subject</b>	This refers to the natural or juristic person to whom personal information relates, such as customers or a provider that supplies the company with electronic, or physical IT services, products or other goods.
<b>Personal Information</b>	Personal information is any information that can be used to reveal a person's identity. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company). The POPI Act lists many examples, which include but are not limited to: race, gender, age, education, identity number or passport number, contact information, etc.
<b>Responsible Party</b>	The entity that needs the personal information for a particular reason and determines the purpose of and means for processing the personal information. The company is the responsible party.
<b>Special Personal Information</b>	Religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject, or criminal behaviour of a person, and personal information about children.

### **3. WHICH PERSONAL INFORMATION DO WE COLLECT**

When interacting with the company websites, we may collect personal information from you such as your name, your contact details and address. This is necessary to fulfil the requirements of the business relationship that may be established. We do not collect special personal information as outlined above.

We do not collect any Special Personal Information as defined in the POPI Act and referenced above.

### **4. HOW WE COLLECT PERSONAL INFORMATION**

- When you complete a contact form.
- When you access and use our website and online portals.
- During the sign-up process for our online services.
- During any telephonic exchange.
- From third parties, like a credit bureau, as required.

We may process information by way of both digital and physical means. This will be the case if you have authorized us to do so, or where the nature of our interaction with you reasonably requires us to do so. We will use your personal information only for the purposes for which it was collected and commit to safeguarding your personal information.

### **5. HOW WE USE PERSONAL INFORMATION**

The proper functioning of the company as an online service provider requires us to process certain personal information, and this could be for any of the following reasons:

- Informing you of updates and issues related to our online services;

- Analysis of your billing preferences;
- Identifying you, your colleagues or other contacts you may nominate;
- To market or provide updates on our services;
- Administration of customer accounts, which potentially includes debt management;
- To provide employment to our employees and to interact with them in the context of the employment relationship;
- To procure services and manage relationships with service providers;
- To provide legally required academic, employment, and other statistical information to Government

and other relevant regulatory bodies;

- For fraud detection and prevention;
- Any other reason which is integral to our optimal functioning as a private limited company.

If requested personal information is not provided to the company, we may not be able to properly fulfil the above-mentioned functions, which may result in the relevant interaction being interrupted, or the company not engaging in such interaction at all, at the sole discretion of the company. The company accepts no responsibility for any interruptions to services rendered if Personal Information was requested by us but not provided.

## **6. CONSENT**

You hereby consent to the company processing your personal information for the reasons set out above.

## **7. DISCLOSURE OF PERSONAL INFORMATION**

In order to maintain and improve our services, the company may, on occasion, need to share your personal information with third parties. The company will only do so where we have agreements in place to ensure the relevant third parties comply with these privacy terms, or where we are legally required, or have a duty or a right to disclose in terms of law or industry codes.

## **8. PERSONAL INFORMATION SECURITY**

Section 19 of the POPI Act requires the company to secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent loss, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information.

The Act further requires the company to take all reasonable steps to identify risks to personal information in its possession or under its control, establish and maintain appropriate safeguards against the identified risks, and ensure that the safeguards are

continually updated in response to new risks, or deficiencies in previously implemented safeguards.

The company commits to notifying you, and the Information Regulator, should we suspect that a data breach has occurred.

## **9. YOUR RIGHTS**

In terms of sections 23 and 24 of the POPI Act, you have the right to access, and to request the company to correct, any personal information retained by us, subject to the provisions of these sections.

Please refer to the company PAIA manual for more information on the process to follow in this regard.

The company will take all reasonable steps to confirm your identity before providing the requested details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee as laid down in the company PAIA Manual.

## **10. CONTACT INFORMATION**

### **THE INFORMATION OFFICER**

- Name: Matthew Groves
- Title: Director
- Email: [mgroves@luciansystems.com](mailto:mgroves@luciansystems.com)
- Tel: +27 (0) 82 087 7123