



PERSONAL DATA PRIVACY NOTICE

Confidential

GENERAL INFORMATION

Introduction

CyberAntix Security Operations Centre as-a-Service (SOCaaS) is a state-of-the-art implementation of managed cybersecurity services, focusing on managed detection and response with associated advanced services (proactive hunting, forensics, code reviews, vulnerability assessment, etc).

We hereby wish to explain how we acquire, use, retain and disclose your Personal Information, as defined, or that of your company or associated entity, as is required by the Protection of Personal Information Act 4 of 2013 (referred to as 'PoPI').

CAX hereby give notification to its Customers or Suppliers that CAX need the Customers or Suppliers Personal Information as defined in the POPI Act, and set-out below, for business transactions, providing of goods, services and support to CAX's Customers and Suppliers.

What is Personal Information?

In terms of PoPI, Personal Information is defined as: information relating to a natural/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, email 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.

Categories of Records held by CAX

Clients – Persons / Entities

Names and surname of contact persons, Identity Number, Date of Birth, Email Addresses, Contact Telephone numbers, Name of Legal Entity, Physical and Postal address, Banking Details, Company VAT number, Financial statements, Registration Number, founding documents, authorised signatories, Landlord Postal Address, Credit Check Information (Information Received), Trade References Names and Telephone Numbers

Service Providers/Suppliers

Names or surname of contact persons, Email Addresses, Contact Telephone numbers, Name of Legal Entity, BBEEE Rating, Physical and Postal address, Banking Details, Company VAT number, Financial information, Registration Number, Founding documents, Tax related information, Product Certification, Credit Check Information (Information Received), Skills Certification Records, OHS Training Records, CIPC documents confirming company registration & active directors.

Purpose of collecting your Personal Information

As our Customer or Service and Product Provider company your Personal Information may be collected by us for the following reasons, some of which are mandatory:

- Registering and managing complaints;
- Keeping of accounts and records;
- Complying with tax laws;
- Collecting visitor data for the purpose of physical security and asset protection;
- Statistical data to be able to report on Strategic business achievements;
- Ability to fulfil contractual obligations with Customers, Suppliers, Employees, Contractors, Consultants and other third parties;
- Verification of creditworthiness of Customers and Suppliers;
- Administering your contract;
- to provide you with access to our products and services, including but not limited to analysis, advice or intermediary services in relation to your contract;
- develop new products and services;
- to help us improve our offerings to you;
- to confirm and verify your identity or to verify that you are an authorised user for security purposes;
- for the detection and prevention of fraud, crime, money laundering or other malpractice;
- to conduct market or customer satisfaction research or for statistical analysis;
- for audit and record keeping purposes;
- in connection with legal proceedings;
- to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.

The type of Personal Information we collect shall depend on the purpose for which it is collected and used. We shall only collect Personal Information that we need for that particular purpose and no more than necessary. In some instances we shall inform you what Personal Information you are required to provide to us and what Personal Information is optional.

Primarily, Personal Information shall be collected directly from you, however, we may also collect Personal Information about you from other sources, with or without your consent. We may collect Personal Information about you from sources which are publicly available such as court judgements, bankruptcy or repossessions.

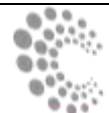
Website usage Personal Information is collected using "cookies" which allows us to collect standard internet visitor usage information.

PERSONAL INFORMATION

Disclosure of your Personal Information

Your Personal Information is kept confidential, however, under certain circumstances, to ensure the purpose of collection is met, we may lawfully disclose it to the following third parties:

- Hosting Partners - Storing of data;
- Shareholders;
- Conducting due diligence checks;
- Third-party verification services doing security checks and credit bureaus;





PERSONAL DATA PRIVACY NOTICE

Confidential

- Suppliers, service providers, vendors, agents and representatives of CAX;
 - Collection agencies;
 - CAX authorised personnel;
 - Court of Law;
 - Regulatory, statutory and government bodies.
- We may also disclose your Personal Information, where we have a duty or a right to disclose in terms of law or industry codes or where we believe it is necessary to protect our rights. The third parties above may sometimes be located outside the Republic of South Africa. We have agreements and security measures in place to ensure that all third parties to whom your Personal Information is disclosed comply with the terms and provisions of the PoPI Act. We ensure that third parties fully understand the duties and obligations they become encumbered with in ensuring the privacy and integrity of your Personal Information.

Protecting your Personal Information

CAX employs up-to-date technology to ensure the confidentiality, integrity and availability of the Personal Information under its care. This is also verified by being ISO27001 – Information Security Management - certified.

- Such measures include:
- Physical Security (Server/DC rooms/Biometric Access)
 - Network Security Controls
 - Virus & Malware protection
 - Software Updates
 - Password Controls
 - Disaster Recovery and Backup policy and measures
 - Service Provider and OEM Agreements
 - Software License Management

Actual or Planned Trans-border Flows of Personal Information:
Customer data, which may include Personal Information of data subjects, may be transferred across borders due to hosted cloud storage services rendered to customers.

- Measures in place for protection of Personal Information includes:
- Ensuring that the foreign country has a law that provides adequate legal protection.
 - Ensuring that there are binding corporate rules that provide adequate protection.
 - Ensuring that there is an agreement between the sender and the receiver that provides adequate protection.
 - Only allowing such transfer if the transfer is necessary for the responsible party to perform in terms of a contract.
 - Ensuring that all data services are protected by the cross border vendors systems, this includes data encryption at rest, path phrase enablement and a variety of Multi factor Authentication options.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is secured. We will ensure that anyone to whom we transfer your Personal Information agrees to treat your Personal Information with the same level of protection as we are obliged to.

ACCESS, CORRECTIONS AND COMPLAINTS

Access to your Personal Information

You may contact our offices to enquire what Personal Information of you we hold. We shall make the Personal Information available to you upon request and after reasonable satisfaction that you have confirmed your identity to us.

Correction of your Personal Information

We are obliged to store Personal Information which is accurate and updated. You may update, correct, amend or delete your Personal Information at any time. We will take all reasonable steps to confirm your identity before making changes to Personal Information.

Procedure to log a complaint

You have the right to address any complaints you may have regarding your Personal Information to our complaints department, details of which are available on our website, alternately you may contact the Personal Information Regulator:
The Information Regulator (South Africa)
Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
Physical Address: JD House 27, Stiemens Street, Braamfontein, Johannesburg, 2001
Website: <https://www.justice.gov.za/inforeg>
Complaints: complaints.IR@justice.gov.za
General Enquiries: inforeg@justice.gov.za

SIGNATURES

Declaration and Informed Private Notice

I declare that all Personal Information supplied to CAX for the purposes of processing and administering my contract and related legal and operational reasons is accurate, up-to-date, not misleading and complete in all respects. I undertake to advise CAX of any changes to my Personal Information should any of these details change.
I hereby permit CAX to process my Personal Information, as provided above, and acknowledge that I understand the purposes for which it is required and all terms and provisions in this Privacy Notice.

Amendments

Please note that we may amend the terms of this Privacy Notice from time to time. Please check our website periodically to inform yourself of any changes.

NAME AND SURNAME	DESIGNATION	SIGNATURE
COMPANY NAME	EMAIL ADDRESS	DATE

