



POPIA PRIVACY POLICY

(rev 01)

LIST OF REVISIONS

rev 01	28/06/2026
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1. INTRODUCTION

The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (*personal information*).

2. WHO IT APPLIES TO

This policy applies to you if you are:

- ✓ a visitor to our website
- ✓ a client who has requested or to whom we currently provide services to

We use your personal data to provide and improve our service. By using the service, you agree to the collection and use of information in accordance with this Privacy Policy.

3. COLLECTION OF PERSONAL DATA

Personal information collection includes:

- a) information that we collect automatically when you visit our website
- b) information collected when you contact us directly
- c) information collected on submission
- d) optional information that you provide to us voluntarily

Personal information may include, but is not limited to:

- a) identifying information such as your name & surname
- b) contact information such as your phone number or email address
- c) address information such as your physical or postal address
- d) where applicable company information linked to your profile
 - your company name
 - your company registration number
 - your company postal address or street address
 - your company VAT number

But excludes:

- a) information that has been made anonymous so that it does not identify a specific person
- b) permanently de-identified information that does not relate to or cannot be traced back to you specifically
- c) non-personal statistical information collected and compiled by us
- d) information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (*because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy*).



4. USING YOUR PERSONAL DATA

Our obligations

We may use your personal information to fulfil our obligations to you and provide you with assistance and/or feedback on requests received from you.

Employees

We may need to disclose / authorize access to your personal information for our employees that require the personal information to fulfil their job responsibilities.

Messages and updates

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

We may send administrative messages and email updates to you about the website. We may wish to provide you with information about new services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages.

We will not send you promotional messages unless you have chosen to opt-into them, but, we may send you one message asking you to opt into promotional messages without you having opted into promotional messaging.

Website Data

Usage Data is collected automatically when using the Website. Our website uses analytics or analysis tools for statistical analysis of user behaviour. Your IP address will be anonymized immediately during this process so that you are not identifiable to us as a user.

We use this de-identified data to:

- ✓ optimize the functionality, accessibility, performance & stability of the website
- ✓ see what, generally speaking, people are interested in

Transfer of Your Personal Data

We don't share your information with anyone, unless instructed by you.

Retention of Your Data

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- ✓ retention of the record is required or authorised by law
- ✓ you have consented to the retention of the record

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.



5. SECURITY OF YOUR PERSONAL DATA

We take the security of your personal information very seriously and always do our best to comply with applicable data protection laws.

Third-party services

We may use third-party service providers to monitor and analyse the use of our service.

- ✓ Google Analytics <https://policies.google.com/privacy>

The various cloud-based platforms we use, have advanced security measures to prevent interference or access from outside intruders.

These policies can be found here:

- ✓ Xero Accounting Software <https://www.xero.com/za/about/security/>
- ✓ Microsoft Cloud <https://www.microsoft.com/en-gb/privacy/privacystatement>

Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

6. LAW ENFORCEMENT

We may disclose personal information if required:

- a) by a subpoena or court order
- b) to comply with any law or legal obligation
- c) to protect the safety of any individual or the general public
- d) to prevent violation of our customer relationship terms
- e) to investigate possible wrongdoing in connection with the Service
- f) to protect and defend the rights or property of the Company
- g) to protect the personal safety of users of the service or the public
- h) to protect against legal liability

7. ACCURACY & UPDATES

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time, we may request you to update your personal information by providing you with a form link.

If you'd like to confirm what information we hold on file for you, please send us a request via email. Note that to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to or making any corrections to your personal information.



8. CHANGE OF OWNERSHIP

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

9. CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy as required. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

10. ENQUIRIES

Please contact us at info@finlayconsulting.co.za, if you have any questions or concerns arising from this privacy policy or the way in which we handle personal information. Access to our PAIA manual can also be requested via this email address.

Michael Finlay *PrTechEng* (201070077)
Principal
for Finlay Consulting Structural Engineers