



Privacy Policy



Table of Contents

1. Introduction	3
2. Objective	3
3. Information we collect	3
4. Processing of personal Information	4
5. Information Security	4
6. Disclosure of Information	5
7. Transfer of Personal Information	5
8. Retention of Personal Information	5
9. Cookies	5
10. Direct Marketing	6
11. Client's Rights	6
11.1 Access to Information.....	6
11.2 Correction of your Information.....	6
11.3 Right to Object.....	6
11.4 Right to Complain.....	7
12. How to contact us	7



1. Introduction

SwiftCom (Pty) Ltd respects the right to privacy and confidentiality of our potential and existing clients' personal information.

The Protection of Personal Information Act describes personal information as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. This includes data such as names, contact details and identity numbers.

This Policy explains how we obtain, use, and disclose our clients' personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA") and the Electronic Communications and Transaction Act ("ECTA").

At SwiftCom we are committed to protecting our clients' privacy and ensuring that their personal information is collected and used properly, lawfully, and transparently.

SwiftCom reserves the right to amend this Privacy Policy or add provisions to it at any time by publishing an updated version on our website.

2. Objective

The objective of this Policy is to ensure compliance with the Protection of Personal Information Act and the Electronic Communications and Transaction Act by:

- Setting out our strategy to uphold the rights to privacy and confidentiality of our clients' personal information.
- Notifying data subjects how we will handle personal information that we obtain.

3. Information we collect

SwiftCom collects personal information in various instances, including when:

- Data subjects contact SwiftCom or request information or services;
- SwiftCom provides services to data subjects;
- Persons apply for employment at SwiftCom;
- When persons use SwiftCom's websites or engage with SwiftCom through social media;
- When persons use SwiftCom's website to complete online surveys or competitions;
- SwiftCom may collect the information directly from a data subject or from third parties (such as regulators, government authorities and registries);

The interaction with SwiftCom on SwiftCom's website will result in the collection of information regarding the person's activities on the website. Similarly, when anyone engages with the company via any one of SwiftCom's social media platforms. This information includes, but is not



limited to, the person's name, contact details and information regarding the matter with which they need assistance.

In the course of engaging with clients, SwiftCom will naturally be exposed to and collect personal information which includes the data subject's name, contact details, financial information as well as other necessary information.

SwiftCom is committed to protecting the privacy rights of minors and we encourage parents and guardians to take an active role in their children's online activities and interests. SwiftCom does not knowingly collect information from minors and will not target its website to minors.

As part of its recruitment processes, SwiftCom may collect information from graduates and employment applicants. This information includes educational information as well as employment history. By inquiring regarding employment opportunities at SwiftCom or applying for employment, applicants are deemed to provide their consent to SwiftCom's processing of their personal information for recruitment purposes, which may include screening as well as background and reference checks.

4. Processing of Personal Information

SwiftCom may process personal information:

- to provide services to clients;
- to comply with legal or regulatory obligations;
- if a data subject has provided their consent; or
- if the processing is allowed by law.

The purposes for which SwiftCom processes personal information include, but are not limited to:

- marketing and promotion of SwiftCom services to which clients may "opt-out" of receiving;
- providing and improving services to clients;
- improving users' experience when using SwiftCom's websites;
- enabling SwiftCom's internal operations;

5. Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that our clients' personal information remains secure.

Our security policies and procedures cover:

- Physical security;



- Computer and network security;
- Access to personal information;
- Secure communications;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

6. Disclosure of Information

We may disclose your information:

- Where we have a duty or a right to disclose in terms of law, industry codes or a Court Order;
- Where we believe it is necessary to protect our rights;

The third parties to whom we disclose personal information include, but are not limited to:

- third party service providers to SwiftCom or its clients;
- government authorities and registries, organs of state, regulators, courts, tribunals, and law enforcement agencies.

7. Transfer of Personal Information

Personal information collected by SwiftCom may be transferred to persons in other countries. Those countries' laws might not protect personal information in the same way or on the same level as the law in the data subject's country. However, SwiftCom will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

8. Retention of Personal Information

SwiftCom retains personal information for as long as may be reasonably necessary in accordance with applicable law.

9. Cookies and Website Use

SwiftCom's website makes use of cookies.

A website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.



Our website may provide links to external websites for your convenience and information. SwiftCom does not accept liability for those sites or their privacy practices and cannot be held responsible the content of such websites.

We encourage you to review the privacy policy of any company before submitting your personal information as unrelated third parties are not covered by the SwiftCom Privacy Policy.

10. Direct Marketing

SwiftCom may send marketing and promotional communications and material to persons. Recipients may opt-out from receiving such communications by contacting SwiftCom at the details provided on our website.

11. Client's Rights

11.1 Access to Information

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided on our website and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

11.2 Correction of your Information

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

11.3 Right to Object

In terms of section 11(3) of the Protection of Personal Information Act you have the right to object to our processing of your personal information.

You may object by sending a request in writing to our e-mail address as provided on our website.



11.4 Right to Complain

You have the right to lodge a complaint with the Information Regulator should you feel that your personal data was not handled in a responsible manner.

The complaint can be sent to the Information Regulator at:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

Or

complaints.IR@justice.gov.za

12. How to Contact Us

If you have any queries about this Policy, need further information about our privacy practices, wish to withdraw consent, exercise preferences or access/correct your personal information, please contact us at the numbers/addresses listed on our website.