



DEFINITIVE SOLUTIONS PARTNER

**DATA PRIVACY AND CONFIDENTIALITY
POLICY**

Purpose

This policy establishes the framework within which Definitive Solutions Partner ensures that all personal and confidential data it collects, stores, processes, or shares is handled lawfully, fairly, and securely. The policy aims to:

- Comply with the Republic of South Africa Data Protection Regulation, the Data Protection Act, and related legislation.
- Maintain the trust of clients, employees, and stakeholders.
- Prevent unauthorized access, loss, or misuse of sensitive information.

Scope

This policy applies to:

- All employees, contractors, agency workers, temporary staff, consultants, and volunteers.
- All data processing systems, whether digital or manual.
- Any third parties acting on behalf of the company who access or process personal or confidential data.

It covers data related to employees, clients, suppliers, job applicants, and any other identifiable individuals or legal entities.

Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual (e.g., names, addresses, phone numbers, emails, CCTV footage, payroll data).
- **Confidential Information:** Any non-public information that could harm the company, its employees, or clients if disclosed, including business contracts, pricing, methods, or internal reports.
- **Processing:** Any operation performed on personal data, including collection, storage, use, transmission, and deletion.

Policy Commitments

1. Lawful Data Collection

- Collect personal data only for legitimate business, employment, or legal purposes.
- Ensure that individuals are informed of how their data will be used at the time of collection through clear privacy notices.
- Obtain explicit consent where required (e.g., marketing communications).

2. Purpose, Limitation, and Fair Use

- Use data only for the purposes for which it was collected.
- Avoid reusing or sharing data in a manner that is incompatible with its original purpose, unless it is legally justified or obtained with additional consent.

3. Confidentiality Assurance

- Maintain strict confidentiality of client contracts, staff information, payroll, supplier details, and access credentials.
- Ensure employees and contractors sign confidentiality agreements before accessing sensitive data.
- Discuss confidential information only with authorized individuals and never in public or unsecured environments.

4. Data Security and Protection

- Use encrypted systems and secure passwords for digital data.
- Restrict access to data based on job roles and responsibilities.
- Physically secure paper records in locked filing systems.
- Ensure regular backups and secure disposal of obsolete hardware and documents.

5. Third-Party Vendors and Processors

- Conduct due diligence and sign Data Processing Agreements (DPAs) with third parties who handle or process personal data on our behalf.
- Ensure third parties maintain equivalent security and compliance standards.
- Monitor and review vendor practices periodically.

6. Data Subject Rights

Support and respect the rights of individuals under data protection laws, including:

- The right to access their data.
 - The right to correct inaccurate or incomplete data.
 - The right to erasure (“right to be forgotten”).
 - The right to data portability.
 - The right to object to or restrict data processing.
- Requests must be handled promptly (within one month) and documented accordingly.

7. Data Retention and Secure Disposal

- Retain data only for as long as necessary for legal, regulatory, or business purposes.
- Use a retention schedule to review and delete outdated records.
- Destroy physical documents by shredding and wipe electronic media before disposal.

This Privacy Policy explains how we collect, use, disclose, and protect your personal information when you use our website and Services.

Address: Naledi Ext, Soweto, Gauteng, 1868 **Email:** info@dsn.co.za **Office Mobile:** 063 263 2367 **Registration Number:**

2016/452388/07 **Tax Number:** 9792597164

1. Information We Collect

We collect several types of information when you use our website and Services:

- **Contact Information:** This includes your name, email address, phone number, and mailing address. We collect this information when you request an estimate, book a service appointment, or contact us for any reason.
- **Service Information:** This includes details about the services you request, such as the type of service, the size of the space, and the frequency of service.
- **Payment Information:** We collect your payment information, such as your debit or credit card number or account number, when you pay for our Services. This information is transmitted securely using industry-standard encryption.
- **Website Usage Data:** We collect information about how you use our website, such as the pages you visit, the links you click on, and your IP address. This information is collected using cookies and other tracking technologies.

2. Use of Your Information

We use your information to:

- Provide and fulfil the Services you request
- Send you appointment confirmations and other service-related communications
- Send you marketing communications (with your consent)
- Respond to your inquiries and requests
- Improve our website and Services
- Analyse website usage data

3. Sharing Your Information

We will not sell or rent your personal information to third parties. We may share your information with third-party service providers who help us operate our business, such as payment processors, marketing companies, and insurance companies. These service providers are only authorised to use your information for the purpose of providing services to us.

We may also disclose your information if required to do so by law or in the good faith belief that such disclosure is necessary to protect our rights, protect your safety or the safety of others, or investigate fraud or other wrongdoing.

4. Your Choices

You have choices about how your information is used:

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3.

- **Marketing Communications:** You can opt out of receiving marketing communications from us by following the unsubscribe instructions in our emails.

- **Cookies:** Most web browsers allow you to control cookies, including whether or not to accept them and how to remove them. Please refer to your browser's settings for more information.

5. Data Security

We take reasonable steps to protect your information from unauthorised access, disclosure, alteration, or destruction. However, no website or internet transmission is completely secure. We cannot guarantee the security of your information.

6. Children's Privacy

Our website and Services are not intended for children under the age of 16. We do not knowingly collect personal information from children under 16. If you are a parent or guardian and you believe that your child under 16 has provided us with personal information, please contact us so we can delete it.

7. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. We will post any changes on our website. You are encouraged to review this Privacy Policy periodically to stay informed about updates.

Responsibilities

- **Information Officer** or designated data controller: Oversee policy implementation, handle data breaches, and respond to subject access requests.
- **Managers:** Ensure teams comply with data protection practices and receive appropriate training.
- **Employees and Contractors:** Handle data responsibly and report any breaches or risks immediately.

Data Breaches and Incident Reporting

In the event of a data breach:

- Employees must immediately report the incident to their manager and the IT Department.
- The company will investigate and assess the risk to individuals.
- If required, the breach will be reported to the Information Commissioner's Office (ICO) within 72 hours.
- Affected individuals may be notified depending on the severity.

Training and Awareness

- All employees and contractors will receive data protection and confidentiality training during onboarding and at regular intervals.
- Ongoing awareness campaigns and refreshers will ensure continued compliance and good practice.

Compliance and Disciplinary Action

Non-compliance with this policy may lead to:

- Internal disciplinary measures (up to and including dismissal).
- Civil or criminal legal action, depending on the severity and intent.
- Termination of contracts with third-party vendors who breach data protection agreements.

Review and Updates

This policy is reviewed annually or upon significant changes in legislation or business operations. Employees will be notified of any updates and provided with relevant training if required.



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ENHANCING EXPERIENCES