

BOLWA SECURITY SERVICES

PRIVACY POLICY

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1. Introduction

Bolwa Security Services ("Bolwa Security Services", "we", "our" or "us") is committed to protecting the privacy, confidentiality and integrity of the personal information entrusted to us by our clients, employees, contractors, suppliers, business partners, website visitors and members of the public.

As a professional security services provider, we recognise that our business involves the responsible handling of personal information, confidential business information and security-related data. We are committed to ensuring that such information is processed lawfully, fairly, transparently and securely in accordance with applicable South African legislation and internationally recognised privacy principles.

This Privacy Policy explains how Bolwa Security Services collects, processes, stores, shares, protects and retains personal information when you:

- visit our website;
- submit an enquiry;
- request a quotation;
- engage our services;
- communicate with us electronically or telephonically;
- apply for employment;
- visit premises where we provide security services; or
- otherwise interact with Bolwa Security Services.

This Privacy Policy has been developed in accordance with, amongst others:

- The Protection of Personal Information Act, 4 of 2013 ("POPIA");
- The Electronic Communications and Transactions Act, 25 of 2002 ("ECTA");
- The Promotion of Access to Information Act, 2 of 2000 ("PAIA");
- The Cybercrimes Act, 19 of 2020;
- Applicable labour legislation; and
- Any other legislation governing the lawful processing of personal information within the Republic of South Africa.

Bolwa Security Services is committed to ensuring that personal information is processed responsibly, ethically and only for legitimate business purposes.

By accessing or using our website, communicating with us or providing personal information to Bolwa Security Services, you acknowledge that you have read, understood and accepted the terms of this Privacy Policy.

2. Definitions

For purposes of this Privacy Policy, the following definitions shall apply:

"Consent"

Means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

"Cookie"

Means a small text file placed on a user's computer, mobile device or other electronic device when visiting a website, enabling the website to recognise the device and remember certain information.

"Data Subject"

Means the individual or juristic person to whom personal information relates.

"Information Officer"

Means the individual appointed or deemed appointed in accordance with POPIA who is responsible for ensuring the organisation's compliance with applicable data protection legislation.

"Operator"

Means a person or organisation that processes personal information on behalf of Bolwa Security Services in terms of a contract or mandate.

"Personal Information"

Has the meaning assigned to it in POPIA and includes information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person.

Personal information may include, but is not limited to:

- Full names;
- Identity or passport numbers;
- Company registration information;
- Contact details;
- Physical and postal addresses;
- Employment information;
- Financial information;
- Photographs;
- CCTV footage;

- Vehicle registration details;
- Online identifiers;
- IP addresses; and
- Any other information capable of identifying an individual or organisation.

"POPIA"

Means the Protection of Personal Information Act, 4 of 2013.

"Processing"

Means any operation or activity concerning personal information, including collecting, recording, organising, storing, updating, retrieving, consulting, using, disseminating, transmitting, distributing, merging, restricting, deleting or destroying personal information.

"Responsible Party"

Means Bolwa Security Services, being the organisation that determines the purpose and means for processing personal information.

"Special Personal Information"

Means personal information relating to matters such as religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, biometric information, criminal behaviour or any other information recognised by POPIA as requiring additional protection.

"Website"

Means the Bolwa Security Services website and any related online platforms owned or operated by Bolwa Security Services.

3. About Bolwa Security Services

Bolwa Security Services is a South African security services company committed to providing professional, reliable and customised security solutions to businesses, organisations, communities and individuals.

Our services include, but are not limited to:

- Security Guarding
- CCTV Monitoring
- Access Control
- Risk Assessments
- Event Security
- Close Protection Services
- Security Consulting
- Security Technology Solutions

- Corporate Cleaning Services
- Specialist Cleaning Services
- Site Security Management
- Security Patrol Services
- Security Risk Mitigation
- Additional security-related services tailored to client requirements.

Given the nature of our operations, we recognise the importance of protecting personal information and maintaining the confidentiality of security-related information entrusted to us.

4. Scope of this Privacy Policy

This Privacy Policy applies to all personal information processed by Bolwa Security Services in the course of conducting its business.

This includes information relating to:

- Website visitors;
- Prospective clients;
- Existing clients;
- Employees;
- Employment applicants;
- Contractors;
- Suppliers;
- Business partners;
- Visitors to premises under our management;
- Individuals captured through security monitoring systems where permitted by law; and
- Any other person whose personal information is processed by Bolwa Security Services.

This Privacy Policy applies regardless of whether personal information is collected electronically, in paper form, verbally, through surveillance systems or by any other lawful means.

Bolwa Security Services is committed to ensuring that all processing activities are conducted lawfully, fairly, transparently and securely in accordance with applicable legislation.

5. Personal Information We Collect

Bolwa Security Services only collects personal information that is necessary, relevant and appropriate for the lawful conduct of our business and the provision of our services.

Depending on your interaction with us, we may collect one or more of the following categories of personal information.

5.1 Personal Identification Information

This may include:

- Full name(s)
- Identity number or passport number
- Date of birth
- Nationality (where required)
- Company registration details
- VAT number (where applicable)
- Job title
- Employer details

5.2 Contact Information

This may include:

- Residential address
- Postal address
- Business address
- Telephone number
- Mobile number
- Email address
- Emergency contact details

5.3 Client Information

Where you enquire about or engage our services, we may collect:

- Service requirements
- Site addresses
- Risk assessment information
- Security requirements
- Property information
- Billing information
- Payment history
- Contract documentation
- Correspondence
- Service records

5.4 Security Operations Information

As part of providing professional security services, we may process:

- CCTV footage
- Visitor registers
- Access control records
- Vehicle registration details
- Patrol reports
- Incident reports
- Alarm activation records
- Photographic evidence
- Security investigation records
- Access logs
- Security audit reports

5.5 Recruitment Information

Employment applicants may be requested to provide:

- Curriculum Vitae (CV)
- Qualifications
- Professional registrations
- Employment history
- References
- Driver's licence details
- PSIRA registration details
- Criminal background checks where legally permissible
- Medical fitness information where required by law

5.6 Website Information

When visiting our website, we may automatically collect:

- IP address
- Browser type
- Device type
- Operating system
- Website usage statistics

- Pages visited
- Date and time of access
- Referring website
- Cookies
- Analytics information

5.7 Special Personal Information

In limited circumstances and only where authorised by law, we may process special personal information where it is necessary for:

- Employment purposes;
- Security investigations;
- Legal proceedings;
- Compliance with legislation; or
- The protection of legitimate interests.

Such information will only be processed where permitted under POPIA.

6. How We Collect Personal Information

We collect personal information in a variety of lawful ways.

Information may be collected directly from you when you:

- Submit an enquiry through our website;
- Request a quotation;
- Contact us by telephone;
- Send us an email;
- Meet with us in person;
- Enter into a service agreement;
- Apply for employment;
- Visit premises where our security services are provided;
- Register as a supplier or contractor; or
- Participate in surveys, promotions or events.

Information may also be collected:

- Through CCTV systems;
- Through visitor management systems;

- Through access control systems;
- Through alarm monitoring systems;
- Through authorised third-party service providers;
- Through publicly available sources;
- Through social media platforms where appropriate;
- Through cookies and website analytics tools; and
- Where otherwise authorised by law.

Where reasonably practicable, we will collect personal information directly from the individual concerned.

7. Purposes for Processing Personal Information

Bolwa Security Services processes personal information solely for lawful, legitimate and clearly defined purposes.

These purposes include:

- Responding to enquiries;
- Preparing quotations and proposals;
- Delivering contracted security services;
- Conducting security risk assessments;
- Managing client relationships;
- Administering contracts;
- Performing security patrols;
- Managing CCTV monitoring services;
- Providing access control services;
- Investigating incidents;
- Maintaining visitor records;
- Processing payments;
- Managing supplier relationships;
- Recruiting employees;
- Conducting reference checks;
- Performing PSIRA verification where applicable;
- Complying with legal obligations;
- Preventing fraud and criminal activity;

- Protecting life and property;
- Improving our website and services;
- Conducting internal administration;
- Managing insurance claims;
- Maintaining business records;
- Responding to legal requests;
- Protecting our legal rights; and
- Any other lawful purpose connected with our business operations.

We will not process personal information for purposes incompatible with those for which it was originally collected unless permitted by law.

8. Lawful Basis for Processing Personal Information

Bolwa Security Services processes personal information responsibly, transparently and only where permitted by applicable South African legislation.

We process personal information on one or more of the following lawful grounds.

Consent

Where required, we obtain your voluntary, specific and informed consent before collecting or processing your personal information.

You may withdraw your consent at any time, subject to any legal or contractual obligations.

Performance of a Contract

We process personal information where necessary to:

- Provide our services;
- Prepare quotations;
- Manage contracts;
- Deliver security services;
- Respond to service requests;
- Process payments; and
- Administer our business relationship.

Compliance with Legal Obligations

We process personal information where required by applicable legislation, including legislation governing:

- Security service providers;

- Labour and employment;
- Taxation;
- Occupational Health and Safety;
- Financial reporting;
- Court orders;
- Law enforcement requests; and
- Other statutory obligations.

Legitimate Business Interests

We may process personal information where necessary to:

- Improve our services;
- Protect our systems;
- Prevent fraud;
- Maintain information security;
- Conduct internal administration;
- Manage risk;
- Improve customer service;
- Undertake quality assurance;
- Conduct business planning; and
- Protect company assets.

Protection of Legitimate Interests

We may process information where necessary to protect:

- Clients;
- Employees;
- Contractors;
- Visitors;
- Members of the public; or
- Other affected persons.

Accountability

Bolwa Security Services accepts responsibility for ensuring that all personal information is processed lawfully, fairly and transparently.

Purpose Specification

We collect personal information only for lawful and clearly defined purposes.

Processing Limitation

Only personal information that is relevant and necessary for the intended purpose is collected.

Information Quality

We take reasonable steps to ensure that personal information remains accurate, complete and up to date.

Openness

We remain transparent regarding our processing activities through this Privacy Policy and our internal governance procedures.

Security Safeguards

Reasonable technical and organisational safeguards are implemented to protect personal information from loss, misuse, unauthorised access or disclosure.

Data Subject Participation

We recognise and respect the rights afforded to data subjects under POPIA.

9. Special Personal Information

Bolwa Security Services generally does not collect or process Special Personal Information unless such processing is:

- Required by law;
- Necessary for employment purposes;
- Required for legal proceedings;
- Necessary for security investigations;
- Required to establish, exercise or defend legal rights;
- Authorised by the data subject; or
- Otherwise permitted under POPIA.

Special Personal Information is afforded additional safeguards and access is restricted to authorised personnel only.

10. Recruitment and Employment Privacy

Where individuals apply for employment with Bolwa Security Services, we may collect and process information including:

- Full names;
- Contact details;

- Curriculum Vitae;
- Qualifications;
- Professional registrations;
- Employment history;
- References;
- Identity documentation;
- Driver's licence information;
- PSIRA registration details;
- Criminal record verification where legally permissible;
- Medical fitness information where required by law; and
- Background verification information.

Recruitment information is processed solely for employment-related purposes.

Information relating to unsuccessful applicants will be retained only for as long as reasonably necessary unless consent has been obtained to retain it for future employment opportunities.

11. CCTV, Surveillance and Security Monitoring

As a professional security services provider, Bolwa Security Services may collect, process and retain information obtained through surveillance and security monitoring systems.

This may include:

- CCTV footage;
- Access control records;
- Visitor registers;
- Security patrol reports;
- Incident reports;
- Vehicle registration details;
- Alarm activation records;
- Photographs;
- Body-worn camera footage (where utilised); and
- Other security-related records.

Such information is collected solely for:

- Crime prevention;
- Safety and security;

- Incident investigation;
- Contractual obligations;
- Legal compliance;
- Risk management; and
- Protection of persons and property.

Where surveillance systems are managed on behalf of clients, Bolwa Security Services processes such information in accordance with contractual obligations and applicable legislation.

Information obtained through surveillance systems will only be disclosed where authorised by law, required by contract, necessary for criminal investigations, required by insurers or regulatory authorities, or necessary to protect legal rights.

12. Cookie Policy

12.1 What Are Cookies?

Cookies are small text files placed on your computer, smartphone or other device when you visit our website. They enable our website to recognise your device and improve your browsing experience.

12.2 Types of Cookies We Use

Our website may utilise:

- Essential Cookies
- Functional Cookies
- Performance and Analytics Cookies
- Marketing Cookies (where applicable)

These cookies assist us in improving website functionality, analysing visitor behaviour, remembering user preferences and enhancing website performance.

12.3 Information Collected Through Cookies

Cookies may collect:

- IP address;
- Browser type;
- Device information;
- Operating system;
- Website usage;
- Pages viewed;
- Session duration;
- Website interactions; and

- General geographic location.

Where this information identifies an individual, it will be treated as personal information under POPIA.

12.4 Managing Cookies

Most browsers automatically accept cookies.

You may choose to:

- Accept all cookies;
- Reject cookies;
- Delete existing cookies; or
- Receive notifications before cookies are stored.

Please note that disabling cookies may affect certain website functionality.

12.5 Third-Party Cookies

Certain third-party service providers, including website analytics providers and embedded content providers, may place cookies on your device. These providers maintain their own privacy policies.

12.6 Cookie Consent

By continuing to use our website, you acknowledge that cookies may be placed on your device in accordance with this Privacy Policy.

Where required by applicable legislation, we will obtain your consent before placing non-essential cookies on your device.

13. Direct Marketing

Bolwa Security Services may, from time to time, communicate with clients and prospective clients regarding our services, industry developments, company news, events, educational content and promotional offers.

Direct marketing communications may be sent by email, telephone, SMS or other lawful electronic communication channels where:

- you have requested information from us;
- you are an existing client;
- you have consented to receive such communications; or
- we are otherwise permitted to do so in accordance with applicable legislation.

You may withdraw your consent or opt out of receiving marketing communications at any time by:

- selecting the "unsubscribe" option contained within our electronic communications;
- contacting us directly using the contact details contained in this Privacy Policy; or

- requesting removal from our marketing database.

We will respect your preferences and process all unsubscribe requests within a reasonable period.

14. Disclosure of Personal Information

Bolwa Security Services treats all personal information as confidential and will not sell, rent or unlawfully disclose personal information to third parties.

Personal information may be shared where reasonably necessary with:

- Employees;
- Security personnel;
- Authorised contractors;
- Professional advisers;
- Auditors;
- Insurance providers;
- Payment processors;
- IT service providers;
- Cloud hosting providers;
- Law enforcement agencies;
- Courts;
- Regulatory authorities;
- Government departments; and
- Other parties where disclosure is required or authorised by law.

All operators and service providers processing information on behalf of Bolwa Security Services are expected to maintain appropriate confidentiality and security standards.

15. International Transfers of Personal Information

Bolwa Security Services may utilise reputable third-party technology providers whose servers or cloud infrastructure are located outside the Republic of South Africa.

Where personal information is transferred internationally, we will take reasonable steps to ensure that:

- the recipient is subject to laws providing an adequate level of protection;
- appropriate contractual safeguards are implemented;
- the transfer is necessary for the performance of a contract;

- the transfer is otherwise authorised under POPIA; or
- the data subject has provided the necessary consent.

We will ensure that all reasonable steps are taken to safeguard personal information regardless of where it is processed.

16. Information Security

Bolwa Security Services is committed to protecting personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access and other unlawful forms of processing.

We implement appropriate administrative, technical and physical safeguards, including, where appropriate:

- Secure computer systems;
- Password protection;
- Multi-factor authentication;
- Encryption technologies;
- Firewalls;
- Antivirus and endpoint protection;
- Secure document storage;
- Physical access controls;
- Visitor management procedures;
- Security monitoring;
- Backup and disaster recovery procedures;
- Access logging;
- Employee training; and
- Periodic security reviews.

Although every reasonable effort is made to safeguard personal information, no electronic transmission or storage system can be guaranteed to be completely secure.

17. Confidentiality and Access to Personal Information

Bolwa Security Services recognises the importance of maintaining the confidentiality of all personal information entrusted to us.

Access to personal information is limited to employees, contractors and authorised service providers who require such access to perform their legitimate duties.

Individuals authorised to process personal information are expected to:

- maintain confidentiality;
- comply with applicable legislation;
- follow internal privacy procedures;
- prevent unauthorised disclosure;
- report suspected security incidents immediately; and
- protect personal information against misuse.

Where appropriate, confidentiality obligations form part of employment contracts, contractor agreements and supplier agreements.

18. Personal Information Security Compromises (Data Breaches)

Should Bolwa Security Services become aware of a security compromise involving personal information, we will investigate the incident promptly and take reasonable steps to contain and mitigate any potential harm.

Where required under POPIA, we will:

- notify affected data subjects;
 - notify the Information Regulator;
 - investigate the cause of the compromise;
 - implement corrective measures; and
 - review our security procedures to reduce the likelihood of recurrence.
-

19. Retention of Personal Information

Bolwa Security Services retains personal information only for as long as reasonably necessary to:

- fulfil the purpose for which the information was collected;
- comply with contractual obligations;
- comply with applicable legislation;
- resolve disputes;
- establish, exercise or defend legal rights; or
- satisfy statutory retention periods.

Once information is no longer required, it will be securely destroyed, deleted or anonymised in accordance with our records management procedures.

20. Automated Decision-Making

Bolwa Security Services does not make decisions concerning individuals solely through automated processing or profiling that produce legal or similarly significant effects.

Where technology assists decision-making, appropriate human oversight remains in place.

21. Your Rights Under POPIA

Subject to applicable legislation, you have the right to:

- request access to your personal information;
- request correction of inaccurate or incomplete information;
- request deletion of personal information where legally permissible;
- object to certain processing activities;
- withdraw consent where processing is based on consent;
- request restriction of processing where applicable;
- lodge a complaint regarding the processing of your personal information; and
- request information regarding the processing of your personal information.

Requests may require verification of identity before being processed.

22. Children's Privacy

Our services are not generally directed towards children.

Where personal information relating to children is processed, such processing will only occur where:

- authorised by a competent person;
 - required by law;
 - necessary to protect the child's legitimate interests; or
 - otherwise permitted under POPIA.
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23. Third-Party Websites

Our website may contain links to third-party websites or online platforms for your convenience.

Bolwa Security Services does not control and is not responsible for the privacy practices, security measures or content of external websites.

Users are encouraged to review the privacy policies of third-party websites before submitting personal information.

24. Information Officer

In accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"), the Information Officer for Bolwa Security Services is:

Johnson Bongani Vetbooi

Chief Executive Officer (CEO)

Bolwa Security Services

The Information Officer is responsible for promoting compliance with POPIA and overseeing the lawful processing of personal information throughout the organisation.

Responsibilities include:

- overseeing POPIA compliance;
- implementing privacy policies and procedures;
- responding to requests from data subjects;
- managing privacy-related complaints;
- maintaining appropriate information security practices;
- overseeing personal information security compromises;
- liaising with the Information Regulator where necessary; and
- promoting awareness of privacy obligations throughout the organisation.

Information Officer Contact Details

Johnson Bongani Vetbooi

Chief Executive Officer

Bolwa Security Services

Email: info@bolwasecurityservices.co.za

Telephone: 011 943 6005

Website: <https://bolwasecurityservices.co.za>

25. Contact Details

Should you have any questions regarding this Privacy Policy or the processing of your personal information, please contact:

Bolwa Security Services

Email: info@bolwasecurityservices.co.za

Telephone: 011 943 6005

Website: <https://bolwasecurityservices.co.za>

26. Complaints Procedure

If you have any concerns regarding the manner in which Bolwa Security Services processes your personal information, we encourage you to contact our Information Officer in the first instance so that we may investigate and attempt to resolve your concerns promptly and fairly.

Should you remain dissatisfied after our internal complaints process has been concluded, you may lodge a complaint with the Information Regulator of South Africa.

Nothing contained in this Privacy Policy limits your rights under POPIA or any other applicable legislation.

27. Information Regulator

Complaints relating to the processing of personal information may be directed to:

The Information Regulator (South Africa)

JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Website: <https://www.justice.gov.za/inforeg/>

Email: enquiries@inforegulator.org.za

28. Amendments to this Privacy Policy

Bolwa Security Services reserves the right to amend or update this Privacy Policy from time to time to reflect changes in legislation, technology, our business operations or best practice.

Any revised version will be published on our website together with the updated effective date.

Continued use of our website or services following publication of any amendments constitutes acceptance of the revised Privacy Policy.

29. Acceptance of this Privacy Policy

By accessing or using the Bolwa Security Services website, requesting our services, communicating with us or otherwise providing personal information, you acknowledge that you have read and understood this Privacy Policy.

Where your consent is required by law, you consent to the collection, processing, storage, disclosure and retention of your personal information in accordance with this Privacy Policy and applicable South African legislation.

Bolwa Security Services remains committed to protecting your privacy and maintaining the confidentiality, integrity and security of all personal information entrusted to us.

