

Privacy Policy

IT-PP-001 | v1.5.0001

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Document Owner	Information Officer
Approved By	Manfred Kloos (Managing Director)
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Classification	Public

POPIA Compliant | GDPR Aware | Public-Facing Website Document

1. Introduction

This Privacy Policy explains how WML Coast (Pty) Ltd (“we”, “us”, the Company) collects, uses, shares, and protects your personal information. We are committed to protecting your privacy and to processing your personal information lawfully, in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA) and, where it applies, the EU General Data Protection Regulation (GDPR).

This policy applies to personal information we collect through our website, in the course of providing our services, and in our dealings with clients, suppliers, and other parties. By using our website or providing us with your personal information, you acknowledge the practices described in this policy.

2. Who We Are

For the purposes of POPIA, the Company is the Responsible Party for the personal information described in this policy. For the purposes of the GDPR, where it applies, the Company is the Controller. Our details are:

Item	Detail
Registered Name	WML Coast (Pty) Ltd
Registration Number	2005/016877/07
Information Officer	Manfred Kloos
Email	manfred@wmlcoast.co.za

Address	35 Church Street, Stellenbosch, 7600
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3. What Personal Information We Collect

We collect the following categories of personal information:

- Identity and contact data: name, job title, employer, email address, telephone number, and postal address;
- Client and project data: information you provide in the course of an engagement, including correspondence and instructions;
- Technical data: IP address, browser type, device information, and pages visited, collected through our website and cookies;
- Recruitment data: where you apply for a position, your CV, qualifications, and references;
- Supplier data: contact and banking details necessary to engage and pay suppliers.

We collect special personal information only where necessary and lawful, and with your consent or another lawful basis where POPIA or the GDPR requires it.

4. How We Collect Your Information

- Directly from you, when you contact us, engage our services, apply for a role, or correspond with us;
- Automatically, through our website and cookies, when you browse;
- From third parties, such as referrers, public registries, and professional networks, where lawful.

5. Why We Process Your Information and Our Lawful Basis

We process personal information for the following purposes, each supported by a lawful basis under POPIA (and, where applicable, GDPR Article 6):

Purpose	Lawful Basis
To provide our services and manage engagements	Performance of a contract
To respond to enquiries and correspondence	Legitimate interest
To process job applications	Steps prior to entering a contract; consent
To manage supplier relationships and payments	Performance of a contract; legal obligation
To comply with legal and regulatory obligations	Legal obligation
To improve and secure our website	Legitimate interest

To send marketing communications (where you have opted in)	Consent
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6. Cookies

Our website uses cookies to function correctly, to remember your preferences, and to understand how the site is used. You can control cookies through your browser settings. Detailed information about the cookies we use is set out in our Cookie Policy, where published. Essential cookies are necessary for the site to work; non-essential cookies are used only with your consent.

7. Sharing Your Information

We share personal information only where necessary and lawful, with:

- Service providers (operators) who process information on our behalf under a written agreement — recorded in our Operator Agreements Register;
- Professional advisers, such as auditors, lawyers, and accountants;
- Regulators and authorities, where required by law;
- Clients and project partners, where necessary to deliver our services.

We do not sell your personal information. We require every operator to protect your information to the standard POPIA demands.

8. Cross-Border Transfers

Where we transfer personal information outside South Africa — for example, to a cloud service or a project partner abroad — we do so only where POPIA Section 72 permits, and we apply appropriate safeguards. Where the GDPR applies, we rely on an adequacy decision, Standard Contractual Clauses, or another valid transfer mechanism. We assess and record these transfers in our Transfer Impact Assessment Register.

9. How Long We Keep Your Information

We keep personal information only as long as necessary for the purposes described in this policy, or as long as the law requires, in accordance with our Retention Schedule (IT-RET-001). When information is no longer needed, we securely delete or anonymise it in accordance with our data classification and retention practices.

10. How We Protect Your Information

We apply appropriate technical and organisational security measures to protect your personal information against loss, misuse, and unauthorised access, including encryption, access control, and staff training. These measures are governed by our IT governance framework, including our Information Technology Policy and Data Classification and Handling Guide.

11. Your Rights

Subject to POPIA (and the GDPR where it applies), you have the right to:

- Access the personal information we hold about you;
- Request correction of information that is inaccurate or incomplete;
- Request deletion of your information where there is no lawful reason to keep it;
- Object to the processing of your information, including for direct marketing;
- Withdraw consent, where we rely on consent;
- Lodge a complaint with the Information Regulator (or, under the GDPR, a supervisory authority).

To exercise any of these rights, contact our Information Officer at the details in Section 2. We will respond within the timeframes the law requires.

12. The Information Regulator

You have the right to lodge a complaint with the Information Regulator (South Africa):

Item	Detail
Email	complaints.IR@inforegulator.org.za
Website	https://inforegulator.org.za
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017

13. Changes to This Policy

We may update this policy from time to time. The current version is always available on our website, and the effective date appears in the document footer. Material changes will be communicated where appropriate. The Information Officer reviews this policy at least annually. Amendments are recorded in the Document Register (IT-REG-001).

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Prepared by Johan Pienaar, The IT Lounge*