

# Data Privacy Policy

in terms of the Protection of Personal Information Act,  
Act 4 of 2013 (PoPI)



## Allegro Enterprises (Pty) Ltd

Registration number: 2018/085911/07  
Ground Floor Twickenham building  
The Campus  
Corner Main and Sloane Street  
Bryanston  
Gauteng  
2021

## ALLEGRO ENTERPRISES (PTY) LTD

including its group companies (hereinafter  
referred to as "Allegro")

### Introduction

We hereby wish to explain how we acquire, use, retain and disclose your personal information, as is required by the Protection of Personal Information Act 4 of 2013 (referred to as 'PoPI').

At Allegro Enterprises, we are committed to protecting your privacy and the integrity of your personal information by dealing with same in a lawful, legitimate and responsible manner.

### What is Personal Information?

In terms of PoPI, Personal Information is defined as: information relating to a natural/juristic person, including, but not limited to—

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

### Purpose of collecting your Personal Information

As an accounting, consulting and advisory company, your personal information may be collected by us for the following reasons, some of which are mandatory:

- for accounting, tax and record keeping purposes;
- in connection with legal proceedings;
- to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law
- to confirm and verify your identity or to verify that you are an authorised user for security purposes;
- for the detection and prevention of fraud, crime, money laundering or other malpractice;
- to conduct market or customer satisfaction research or for statistical analysis;

The type of information we collect shall depend on the purpose for which it is collected and used. We shall only collect information that we need for that particular purpose and no more than necessary. In some instances we shall inform you what information you are required to provide to us and what information is optional.

Primarily, information shall be collected directly from you, however, we may also collect information about you from other sources, with or without your consent. We may collect information about you from sources which are publicly available such as electoral roll, court judgements, bankruptcy or repossessions.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information across our websites: [www.allegro-enterprises.com](http://www.allegro-enterprises.com), [www.allegroed.co.za](http://www.allegroed.co.za) or [www.allegroed.talentlms.com](http://www.allegroed.talentlms.com)

### **Disclosure of your Personal Information**

Your personal information is kept confidential, however, under certain circumstances, to ensure the purpose of collection is met, we may lawfully disclose it to the following third parties:

- Service providers;
- Subcontractors;
- Agents;
- Statutory authorities;
- Allegro authorised personnel;
- Court of Law;
- Governmental bodies;
- The regulator.

We may also disclose your personal information, where we have a duty or a right to disclose in terms of law or industry codes or where we believe it is necessary to protect our rights. The third parties above may sometimes be located outside the Republic of South Africa.

We have agreements and security measures in place to ensure that all third parties to whom your personal information is disclosed comply with the terms and provisions of the PoPI Act. We ensure that third parties fully understand the duties and obligations they become encumbered with in retaining the privacy and integrity of your personal information.

### **Protecting your Personal Information**

In terms of legislation we are obliged to implement measures and strategies to ensure protection of your personal information, whereby, unauthorised access and use is deterred. Our security policies and procedures which are reviewed on an ongoing basis include the following:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is secured. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

### **Access to your Personal Information**

You may contact our offices to enquire what personal information we hold for you. We shall make the information available to you upon request and after reasonable satisfaction that you have confirmed your identity to us.

### **Correction of your Personal Information**

We are obliged to store information which is accurate and updated. You may update, correct, amend or delete your personal information at any time. We will take all reasonable steps to confirm your identity before making changes to personal information.

### **Complaints**

You have the right to address any complaints you may have regarding your personal information to our complaints department, details of which are available on our website, alternately you may contact the Personal Information Regulator:

The Information Regulator (South Africa)

SALU Building

316 Thabo Sehume

Street0001 PRETORIA

Tel: 012 406 4818

Fax: 086 500 3351

infoereg@justice.gov.za

### **Amendments**

Please note that we may amend this notice from time to time. Please check our website periodically to inform yourself of any changes.

### **Declaration and Informed Consent**

I declare that all Personal Information supplied to Allegro for the purposes of audit and related legal and operational reasons is accurate, up-to-date, not misleading and complete in all respects. I undertake to advise Allegro of any changes to my Personal Information should any of these details change.

I hereby permit Allegro to process my Personal Information, as provided above, and acknowledge that I understand the purposes for which it is required and all terms and provisions in this Notice.

### **Termination**

Should you at any point wish to revoke this consent, please contact us – details available on our website – and we will assist you accordingly.