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Rytronix (PTY) Ltd.

Privacy Policy.

Rytronix | Address: 9 Adjutant road, Elma Park, Edenvale
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Website: http://www.rytronix.co.za

Rytronix (Pty) Ltd – Privacy Policy

Privacy Policy

1. Introduction

1.1 **Commitment to Privacy.** Rytronix (Pty) Ltd ("**Rytronix**", "**we**", "**us**" or "**our**") is committed to protecting the privacy and personal information of our customers, website visitors, and users of our Services. This Privacy Policy ("**Policy**") describes how we collect, use, store, disclose, and protect personal information in accordance with the requirements of the **Protection of Personal Information Act, 4 of 2013 (POPIA)** and other applicable laws. We strive to process personal information in a lawful, legitimate, and responsible manner. By engaging with our Website or Services, you ("**you**" or "**data subject**") consent to the practices described in this Policy. If you do not agree with this Policy, please do not provide us with personal information or use our Services.

1.2 **Scope.** This Policy applies to personal information that we process in the course of our business, including through our website (www.rytronix.co.za), any related sites or online portals we operate, and in providing our IT, web, software, and automation services. It covers personal information relating to customers (and their representatives), prospective customers, website visitors, and other individuals who interact with us. For purposes of this Policy, "**personal information**" has the meaning ascribed in POPIA, essentially information about an identifiable natural person or (where applicable) an identifiable juristic person (such as a company), including but not limited to contact details, identifying numbers, location information, online identifiers, and any other information that is linked to an identifiable person.

1.3 **Responsible Party.** Rytronix (Pty) Ltd is the "Responsible Party" (equivalent to "data controller" in other jurisdictions) for the personal information that you provide to us or that we collect from you, except in cases where we process data on behalf of a client as an "Operator" (data processor) (such as when we host a website that contains your personal information controlled by our client – see Section 7 of this Policy). We have appointed an internal **Information Officer** who is responsible for overseeing questions related to this Privacy Policy and our data protection practices. The contact details for privacy inquiries are provided at the end of this Policy.

1.4 **Acceptance and Changes.** By providing us with personal information or using our Website/Services, you acknowledge that you have read and understood this Policy. We may update this Privacy Policy from time to time to reflect changes in law or our practices. The updated version will be posted on our Website with a revised "Last Updated" date. In case of significant changes, we may also notify you via email or a notice on our site. Your continued use of our Services or providing further personal information after such updates constitutes acceptance of the amended Policy.

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2. Collection of Personal Information

2.1 **Information You Provide.** We collect personal information directly from you in several ways, including:

- **Account Registration or Service Signup:** When you register an account on our Website or sign up for our Services, we may ask for identifying and contact information such as your name (and/or company name), identity or registration number, physical or postal address, email address, phone number, and username/password. If you are purchasing services, we may also request payment-related information (such as credit card details or banking information) – note that for online payments, we often use secure third-party payment processors, so we may not store your full card details ourselves.
- **Communication and Support:** If you contact us with an inquiry, request support, or communicate via email, phone, contact form, or live chat, we will collect any personal information you choose to give us in those communications. For example, you might provide your name and contact and describe the issue you need help with. If you participate in any surveys or provide feedback, we collect the info you provide.
- **Orders and Contracts:** When you request a quote or place an order for our Services or Goods, we will collect information needed to process the transaction and fulfill your order. This can include your contact details (as above), billing address, VAT number (if applicable), details about your requirements, and any content or specifications you provide for us to perform the service (which might contain personal info, e.g., a list of your employees and their emails if we are setting up accounts for them).
- **Client Content:** If you provide us with content that contains personal information (for example, if you supply a list of your customers' emails to upload into a system, or give us access to your systems that have personal data), we will collect whatever personal information is contained in that content. However, in such cases, we typically act as an Operator processing that data on your behalf (see Section 7). You should only provide personal information of third parties if you have the legal right to do so.

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2.2 **Information We Collect Automatically.** When you visit our Website or use our online services, we may automatically collect certain information about your device and usage via cookies and similar technologies:

- **Device and Technical Information:** This may include your IP address, browser type and version, device type, operating system, referring URLs, and other technical information that is automatically logged by our web server. We use this to ensure the Website functions properly and is displayed correctly on your device.
- **Usage Data:** We may record information about your visit, such as the pages or content you view, the dates and times of access, the time spent on pages, clicks and scrolls, search queries on our site, and other interactions. This usage data is often aggregated and does not directly identify you, but if it can be linked to you (for instance, if logged in), we treat it as personal information.
- **Cookies:** Our Website uses "cookies" and related technologies (like pixel tags or local storage) to collect information about your browsing actions. Cookies are small text files placed on your device to store data that can be recalled by our web server. They help us provide a better user experience (e.g., keeping you logged in, remembering preferences) and understand how our site is used. We may use both session cookies (which expire when you close your browser) and persistent cookies (which stay on your device for a set period or until deleted).

  The types of cookies we use include:

  (a) **Necessary cookies** – essential for the operation of our site (e.g., session cookies, security cookies);
  (b) **Analytics cookies** – to collect information about site usage (for example, Google Analytics may set cookies to help us analyze traffic);
  (c) **Functionality cookies** – to remember choices you make (like language or region, or your username for auto-login);
  (d) **Advertising/Marketing cookies** – if we ever use advertising or remarketing, these cookies would collect info about your browsing to present relevant ads. We will obtain your consent for non-essential cookies where required by law. You can control or delete cookies using your browser settings, but note that disabling certain cookies may affect site functionality.

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2.3 **Information from Third Parties.** In some cases, we might receive personal information about you from third parties:

- If you are an employee or representative of one of our corporate customers, your employer might provide us with your details as a contact person or authorized user for the Service.
- If we perform a credit check or vetting (for example, for large contracts or hardware financing), we may obtain data from credit bureaus or reference agencies, subject to applicable law.
- We might collect information from publicly available sources (such as your business website or professional profile) for business contact details.
- If a person referred you to us, we may collect basic info to follow up on the referral (ensuring we comply with direct marketing rules under POPIA and CPA – we would only contact you if the law permits or with your consent).
- If you use third-party login features (e.g., signing into a client portal via Google or Microsoft single sign-on), those services may share certain profile info with us based on your privacy settings at that service. We will only use it for authentication and as otherwise described at point of collection.

2.4 **Children's Information.** Our Services and Website are not directed to minors (children under 18 years of age) and we do not knowingly collect personal information from minors without parental consent. If we need to provide a service to a minor (for instance, if part of a smart home solution involves user profiles for children), we will require that a parent or guardian consent on their behalf as required by POPIA. If you believe we have collected personal information from a minor without proper consent, please contact us so we can investigate and delete it as appropriate.

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3. Purpose and Use of Personal Information

We will only use personal information for purposes for which it was collected, or for related purposes that are reasonably expected, or as otherwise permitted or required by law. The specific purposes for which we process personal information include:

3.1 **Service Delivery:** We use personal information to set up and provide our Services to you. For example, we need to use your contact details to communicate with you about your project or hosting account, to deliver any physical Goods to your address, to register domain names in your name, or to create user accounts for you in systems we deploy. If we are developing a website or software for you, the information you provide (including any personal data contained in the project content) will be used to build and configure that solution.

3.2 **Administration and Customer Management:** We process personal information for general business and customer administration tasks, such as billing and invoicing, processing payments, maintaining our customer database, providing customer support, and managing contracts. For instance, we will use your personal information to issue invoices, to process payments (through secure payment providers), to send service statements or payment reminders, and to contact you about renewals or account status. We also maintain records of communications with you (e.g., support tickets, emails) to ensure quality service and to have a history of your requests and any issues raised.

3.3 **Communication and Notifications:** We will use your contact information to send important notices relating to the Services. This includes communications about updates or changes to our terms or policies, security or service outage alerts, maintenance downtime notices, and responses to inquiries you have made.
These service-related communications are necessary for the ongoing provision of services and are not considered direct marketing (thus, you will receive them even if you opt out of marketing messages).

3.4 **Marketing (Direct Marketing):** With your consent, or if you are an existing customer within the context of an existing customer relationship, we may use your contact information (email, phone) to send you marketing or promotional communications about our services, new offerings, special offers, newsletters, or events that we believe may be of interest to you. For example, we might announce a new product line or a discount on upgrading your hosting package. We will comply with the direct marketing provisions of POPIA and the ECTA: this means we will only send you electronic marketing communications if you are a customer or have inquired about our services, or if you have opted-in. And in every marketing message, we will give you an opportunity to "opt out" or unsubscribe from future marketing. If you tell us that you do not want to receive any marketing, we will respect your choice – your decision not to receive marketing won't affect your access to our Services.

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3.5 **Analytics and Improvement:** We use the automatically collected information (see Section 2.2) to understand how our Website and Services are being used, to monitor performance and troubleshoot issues, and to improve our offerings. For instance, we might analyze which pages of our site get the most traffic or where users drop off, so we can improve the user experience or content. We might also analyze support queries to identify common issues that could be addressed with better documentation or product changes. Generally, we use aggregated and de-identified data for analytics, but even when usage data is tied to an IP or user ID, it is used internally for the purpose of improving our service delivery.

3.6 **Security and Abuse Prevention:** We may process personal information (especially usage data like IP addresses and logs, and user account info) to maintain the security of our systems, to detect and prevent fraud, unauthorized access, attacks (e.g., to identify a potential DDoS source or hacking attempt), or other misuse of our Services. For example, we might log and review IP addresses that attempt to log in to accounts, or use automated tools to scan for malware or illegal content in hosting accounts (as part of Acceptable Use enforcement). We also may use CCTV or security systems at our physical premises that could capture visitors' images for safety and crime prevention (those recordings would also be personal information if someone can be identified).

3.7 **Legal Compliance and Enforcement:** In certain cases, we need to use or disclose personal information to comply with legal obligations or in response to legal process. This includes: responding to subpoenas, court orders, or official requests from authorities; retaining and producing records as required by tax laws or other regulations; and processing opt-out or deletion requests from data subjects as required by POPIA. We also may process personal information as needed to enforce our Terms & Conditions or to protect our rights, privacy, safety, or property, or those of other persons (for instance, using personal data to investigate a breach of contract or intellectual property infringement).

3.8 **Other Purposes:** If we intend to use personal information for any purpose that is materially different from the purposes listed above, we will ensure that we have a lawful basis for that (such as your consent, or a legal obligation, or it being a legitimate interest that is not overridden by your privacy rights) and we will provide you with notice of the new use. For example, if in the future we wanted to use customer testimonials with names or photos on our website, we would ask for specific consent for that use.

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4. Disclosure of Personal Information

Rytronix respects the confidentiality of your personal information and will not sell, rent, or trade your personal information to third parties. We will only share personal information with third parties under the following circumstances and with appropriate safeguards:

4.1 **Employees and Contractors:** Personal information will be accessed by our employees or authorised contractors who require the information to fulfill their duties in relation to the purposes stated. For example, our support technicians will have access to your account details to assist you, and developers may have access to project files that include your information. All such personnel are bound by confidentiality obligations and are trained on protecting personal data.

4.2 **Service Providers (Operators):** We may share necessary personal information with third-party service providers who process data on our behalf (acting as "Operators" under POPIA) to facilitate or outsource certain aspects of our services. These may include:

- **Data hosting and Infrastructure:** We may host data on third-party data center or cloud infrastructure (for example, using a cloud server provider or a backup storage provider). Personal information might thus be stored on their servers. We choose reputable providers with robust security.
- **Payment Processors:** If you make payments via credit card or other methods, your payment details might be processed by third-party payment gateways (like PayFast, PayPal, banks) which are PCI-DSS compliant. We share the info needed to process the transaction (like order number, amount, and card details input by you). These payment providers are responsible for the data they require to process payments.
- **Email and Communication Tools:** We may use third-party email service providers (e.g., SMTP relays, mailing list services) to send out communications, invoices, or newsletters. Your email and name might pass through those systems.
- **Analytics and Marketing Tools:** We might use analytics services like Google Analytics; these use scripts/cookies that collect usage data (IP, pages viewed) on our site which is shared with those analytics providers (Google LLC in this case) for the purpose of analyzing our site traffic. We might also use marketing automation or CRM systems to manage customer data and communications.
- **Professional Advisors:** We may disclose necessary personal information to our auditors, legal advisors, insurers, or other professional consultants if that is needed for conducting audits, getting legal advice, or managing claims, etc. These third parties are typically bound by confidentiality as well.

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Whenever we use service providers, we ensure that they have agreed to protect personal information with appropriate security and to only use it for the purposes we specify, consistent with this Policy (in a manner compliant with POPIA's operator requirements).

4.3 **Business Transfers:** If Rytronix is involved in a merger, acquisition, sale of assets, restructuring, or other corporate transaction, personal information may be disclosed to potential or actual purchasers (and their accountants, attorneys, etc.) as part of due diligence or the transfer itself. We will ensure that such parties are bound to maintain confidentiality. If a transfer of business occurs, the successor company will assume the rights and obligations regarding your personal information as described in this Policy, unless you are notified otherwise.

4.4 **Legal Disclosures:** We may disclose personal information to third parties when required by law or legal process, or if we have a good faith belief that such disclosure is necessary to:

(a) comply with a legal obligation, a court order, or respond to a subpoena, warrant, or governmental request;
(b) enforce our Terms & Conditions or other agreements;
(c) address fraud, security, or technical issues; or
(d) protect our rights, property, or safety, or that of our customers, employees, or the public.
For instance, we might share information with law enforcement if required to investigate illegal activities like cybercrimes or fraud. Where appropriate and lawful, we will attempt to notify you of such disclosure (for example, if your data is subject to a subpoena) so you can act if you wish, unless we are legally prevented from doing so or the matter is urgent or clear (like sharing info about a crime in progress).

4.5 **Your Own Use and Third-Party Integrations:** If our Service allows you to integrate with third-party platforms or if you request that we share data with a third party (for example, if you ask us to set up an integration with an SMS service or shipping provider, which requires sharing some of your data with that provider), we will do so under your direction. Similarly, any data you choose to make public (such as posting a testimonial on our site or interacting on our social media pages) will obviously be visible to others. Any personal information you provide to third-party services (even if linked from our Services) is handled by those third parties according to their own privacy policies.

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5. Security of Personal Information

5.1 **Safeguards:** We take the security of personal information seriously and implement appropriate, reasonable technical and organizational measures to prevent loss, damage, unauthorized destruction, and unlawful access to or processing of personal information. These measures include, but are not limited to: using firewalls and intrusion detection on our servers; encrypting sensitive data in transit via TLS/SSL (for example, our website and portals use HTTPS, and we encourage strong encryption for emails or provide secure upload methods for sensitive files); access control mechanisms ensuring that only authorized staff can access personal data relevant to their duties (this involves unique user IDs, strong passwords or keys, and role-based access privileges); regular security updates and patch management on systems; antivirus and anti-malware solutions; and physical security controls for our office and any data center facilities (like access badges, CCTV, security personnel). We also ensure that our employees and contractors who handle personal information are trained in confidentiality and data protection.

5.2 **Encryption and Storage:** Wherever feasible, we encrypt personal information, especially sensitive information. For example, passwords are stored in hashed form; payment card details are not stored on our systems (they go directly to the payment processor, or if temporarily stored, we use encryption). Data backups are typically encrypted. We store personal information on secure servers and cloud platforms that adhere to industry security standards.

5.3 **Monitoring and Testing:** We monitor our systems for possible vulnerabilities and attacks, and we conduct periodic risk assessments and testing of our security controls. We may run vulnerability scans or engage third-party security experts to perform penetration testing on our infrastructure. Any identified issues are reviewed and mitigated as needed.

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5.4 **Breach Notification:** Despite our best efforts, no method of safeguarding information is completely secure. In the unlikely event that we identify a security breach leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal information (a “data breach”), we will promptly assess the risk to your personal information. If the breach is likely to result in harm to you (such as identity theft or fraud, physical harm, damage to reputation or economic loss), we will inform you and the relevant regulatory authorities (like the Information Regulator under POPIA) as required by law, without undue delay, and within the timelines set out by applicable law. We will provide you with information on the nature of the breach, the personal data affected (if known), steps we are taking to address it, and recommendations for you to mitigate possible adverse effects. We will also take steps to investigate and mitigate the breach, and to prevent future incidents.

5.5 **Your Responsibilities:** While we are committed to securing our systems, it is important to note that you also play a role in the security of your personal information. We urge you to use strong, unique passwords for your accounts with us and for any integrated systems, to protect those credentials, and to log out of websites or portals when finished, especially on shared devices. Do not disclose your account passwords or verification codes to anyone. If you suspect any unauthorized access to your account or personal data, please notify us immediately. Additionally, be cautious about phishing attempts; Rytronix will never ask you for your password via email or unsolicited calls. Verify that communications are actually from us (check email domains, etc.) especially if they request sensitive info.

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6. Retention of Personal Information

6.1 **Retention Period:** We will not retain personal information for longer than is necessary to achieve the purpose for which it was collected or processed, unless a longer retention period is required or permitted by law. The criteria we use to determine retention periods include: the duration of our relationship with you (for example, as long as you have an active account or ongoing services, we will keep relevant personal info in order to service you); legal and regulatory requirements (there are laws that mandate keeping certain records for a minimum time – for instance, financial and transaction records must be kept for at least 5 years under tax and accounting laws; information that may be relevant to disputes, litigation or investigations might be kept as necessary for those purposes); and our legitimate business needs (such as maintaining security, preventing fraud, and keeping business records of services provided).

6.2 **Deletion or Anonymization:** Once the retention period expires, and if we have no other lawful basis to retain the data, we will securely delete or irreversibly anonymize your personal information. For example, if you terminate all services with us and the applicable retention periods have elapsed, we will remove personal data from our active systems. We may retain anonymized or aggregated data (which is not personally identifiable) for analytics or statistical purposes indefinitely, because it no longer constitutes personal information.

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6.3 **Specific Examples:**

- **Account Information:** If you cancel your account or services, we will retain your basic account information (like name, contact details, contract and transaction history) for a period (often 5 years) post-termination, in case of queries, refunds, chargebacks, disputes, or legal obligations. However, we will restrict processing of that data to storage or for purposes required (it won't be used for marketing after termination unless you consent anew).
- **Project Files:** If we developed a website/software for you and you stop services, we may delete the hosted instance after a short grace period (e.g., 30 days after termination as per Terms), but we might retain internal archival copies or version history for a longer period (for example, to have a record of work done, or in case you return as a customer and need that data). These archival copies would be secured and not used unless needed for a legitimate reason. You can also request return of project files upon termination; we encourage you to take copies of any data you need before the end of service.
- **Communication Logs:** Emails and support tickets may be retained for a few years after resolution for record purposes and to improve our services.
- **Backups:** Backups of data (especially for hosting content) might be stored in encrypted form for some period even after deletion from live systems, due to backup cycles. We will ensure they are purged in due course or overwritten in line with our backup retention schedule.

6.4 **Legal Holds:** Note that if any information is subject to a legal hold (for example, related to litigation or investigation), we will retain it until the hold is removed, even if that extends beyond our standard retention period.

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7. Processing of Third-Party Personal Information (Operator Obligations)

7.1 **Customer as Responsible Party:** In many cases, particularly when we provide hosting or development services, our customer (you) may be collecting personal information from your own customers or users which is then stored on our servers or processed through our systems as part of our service to you. In such scenarios, **you are the Responsible Party** (data controller) in respect of that third-party personal information, and we act as an **Operator** (data processor) on your behalf. For example, if we host an e-commerce site for you, you might collect your shoppers' personal details and orders; those are your data subjects and you determine the purpose and means of processing their data, while we just provide the infrastructure.

7.2 **Operator Undertakings:** When we act as an Operator processing personal information on your behalf, we will:

- Process such personal information only on your instructions or as required to provide the services you have subscribed to (except where otherwise required by law, in which case we'll inform you unless prohibited). By using our services, you instruct us to process personal data in accordance with the functionality of those services and as described in our Terms and this Policy.
- Treat any personal information we encounter with confidentiality and not disclose it to anyone (except sub-operators assisting us in providing the service, under similar obligations, or as required by law).
- Implement the security safeguards described in Section 5 to protect the personal information. We will notify you of any confirmed security breach affecting the data we process for you without undue delay so you can take appropriate measures (like notifying your data subjects or regulators, if needed).
- At your direction (for example, if you as our client ask), assist with reasonable efforts in responding to requests from data subjects who wish to exercise their POPIA rights (like access or correction) or in demonstrating compliance with POPIA obligations, taking into account the nature of processing and the information available to us. Note that ultimately, as Responsible Party, you are obliged to handle your data subjects' requests, but we will cooperate as needed, possibly with a reasonable fee if the effort is substantial.
- Upon termination of services or upon your written request, return to you or delete the personal information that we process on your behalf, except to the extent we are required to retain it by law or for legitimate business reasons as an independent Responsible Party. We may retain a copy for evidence purposes if there's a legal dispute, for instance.

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7.3 **Sub-Operators:** You authorize us to engage sub-operators (subprocessors) as needed to deliver the services (such as data centre providers, cloud services, email delivery platforms, etc. mentioned in 4.2). We will ensure any such sub-operator is bound by obligations similar to those in this Section and Section 5 for the protection of personal information. We remain responsible to you for our sub-operators' processing of personal data on our behalf.

7.4 **Cross-Border Transfers on Your Behalf:** If you as the Responsible Party require that personal information be transferred to a third party or to systems located outside of South Africa (for example, if you ask us to host a site on an international server or integrate with an API based abroad), you are responsible for ensuring that such transfer is lawful under POPIA Section 72 (which generally requires adequate protection in the foreign country or consent of the data subjects, etc.). By instructing us to carry out such processing or transfers, you are confirming to us that you have complied with the cross-border transfer requirements or have an exemption (like consent). We as Operator will implement any reasonably required measures to ensure compliance (like signing EU Standard Contractual Clauses if needed for an EU data transfer, etc.) upon your request and cost if applicable.

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8. Cross-Border Transfer of Personal Information

8.1 **We are Based in South Africa:** The personal information we collect is primarily processed in South Africa, where our offices and main infrastructure are located. However, in today's interconnected world, it is possible that personal information may be transferred across national borders, for the reasons and using the services outlined below.

8.2 **International Services and Subprocessors:** Some of the third-party service providers we use (see Section 4.2) may store or process data in other countries. For example: if we use a cloud infrastructure provider that has servers in Europe or the USA, or an email service that routes through servers internationally, or if we back up data to an overseas location for redundancy. Additionally, if you request a service that involves an overseas component (like registering an international domain, or hosting a site on a server in another country), then obviously those personal details needed will be transferred to that jurisdiction.

8.3 **Protections for Cross-Border Transfers:** Whenever we transfer personal information out of South Africa to countries that may not have the same level of data protection as SA, we will ensure that appropriate safeguards are in place as required by POPIA.

This might include:

- Ensuring the receiving country is one deemed to have adequate data protection laws (as may be recognized by the Information Regulator or SA law from time to time).
- If not, we will ensure the third party is bound by agreement to provide a level of protection commensurate with POPIA's requirements. Often this involves using contracts with standard data protection clauses (such as the EU's Standard Contractual Clauses or similar mechanisms) or requiring the third party to be certified under a recognized framework that provides adequate protection (e.g., if they are in the US and certified under Privacy Shield's successor or similar).
- Sometimes, we may rely on your consent for a transfer, or that the transfer is necessary for performing a contract with or for you (for instance, if you want us to set up a service that inherently requires sending data to another country, we view your request as consent and necessity for that transfer).

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8.4 **Common Cross-Border Scenarios:**

- **Website Analytics & Ads:** If we use Google Analytics, data about your use of our website (which could include your IP) may be processed on Google's servers which could be worldwide (often US or EU). Google is subject to stringent data protection terms and we anonymize IP addresses in analytics to reduce impact.
- **Email/CRM**: If we use an email campaign service (like Mailchimp or similar) or a CRM hosted abroad, your contact info might be stored on their servers outside SA. We ensure these providers contractually commit to protecting data (many are compliant with GDPR which is robust).
- **Cloud hosting**: We might host certain workloads in, say, an AWS data center. If we choose an AWS region outside SA (for performance or redundancy), personal data in that system will be in that region. AWS is compliant with data protection frameworks and we apply encryption.

8.5 **Your Acknowledgment:** By providing us with personal information or using our services, you understand that cross-border transfer of personal information may occur, and you consent to such transfer where required. We will take all reasonable measures to ensure transferred data remains protected, but please note that laws in other countries might differ from SA and governments or courts abroad might order disclosure of personal information under their laws. We will, however, not transfer your personal information to any third party in another country unless it's done in compliance with POPIA and this Policy.

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9. Your Rights as a Data Subject

As a data subject, you have certain rights regarding your personal information under POPIA and other data protection laws. We respect these rights and have processes in place to ensure we uphold them. Your rights include:

9.1 **Right of Access:** You have the right to request confirmation that we hold personal information about you, and to request a copy of that personal information, as well as information about the identities of all third parties, or categories of third parties, who have or have had access to your information. This is commonly known as a "data access request." Upon a valid request, and subject to verifying your identity, we will provide you with the requested information, provided it does not affect the rights of others and falls within the permissible timelines (within a reasonable time, and at most 30 days or as allowed by law, possibly extendable once with notice). Please note we may charge you a fee for providing copies in certain circumstances as allowed by law (especially if a request is manifestly unfounded or excessive). We will inform you in advance of any fee and get your confirmation to proceed.

9.2 **Right to Correction/Rectification:** You have the right to ask us to correct or update any inaccurate, out-of-date, irrelevant or incomplete personal information we hold about you. For example, if your contact number or address has changed, or if we have misspelled your name, you can request a correction. We encourage you to keep your information with us up to date. When we receive a request for correction, we will, upon verification and where reasonable, update the information and notify you of the change. If for some reason we cannot make the correction (perhaps because we dispute the accuracy of the new info), we'll let you know and you may request us to attach a statement to the record noting your view that the information is inaccurate or incomplete.

9.3 **Right to Deletion (Erasure):** In certain circumstances, you may request that we delete or destroy your personal information. This is sometimes referred to as the "right to be forgotten." For example, if the information is no longer needed for the purposes for which it was collected, or if you withdraw consent (where consent was the basis of processing) and no other legal ground exists, or if you believe we are processing it unlawfully. However, this right is not absolute – we may need to retain certain information as required by law or for legitimate business purposes (e.g., we cannot delete your billing records if we are required by law to keep them, or if you still have an active contract with us we need basic info to service it). If you request deletion, we will remove the information that we are not lawfully obliged to retain, and we will also direct any third parties who received such data from us (per Section 4) to do the same, where required by law and feasible.

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9.4 **Right to Object to Processing:** You have the right, in certain circumstances, to object to our processing of your personal information. This applies especially to processing based on our legitimate interests or for direct marketing purposes.

- **Direct Marketing Opt-Out:** You may object at any time to the processing of your personal information for direct marketing. If you object or unsubscribe, we will stop using your information for that purpose immediately (and at no cost to you). This includes profiling related to direct marketing.
- **Other Objections:** If we are processing your data based on our or a third party's legitimate interests, or for research or statistical purposes, and you feel it impacts your rights, you may object. We will then cease the processing unless we have compelling legitimate grounds that override your objection or the processing is needed for legal claims. For example, if we use your data to improve our services (legitimate interest) and you object citing personal circumstances, we'll consider your request and either stop or explain why we lawfully can continue.

9.5 **Right to Withdraw Consent:** In situations where we process your personal information based on your consent (for instance, optional marketing communications or certain uses of sensitive personal data), you have the right to withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of processing done prior to withdrawal, and it won't affect processing under other grounds. If you withdraw consent for a service that requires it (like certain optional features), we may not be able to provide that feature to you going forward.

9.6 **Right to Complain:** If you believe we have infringed your privacy rights or not responded to your requests adequately, you have the right to lodge a complaint with the **Information Regulator** of South Africa. You can contact the Information Regulator at: **JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001**; P.O Box 31533, Braamfontein, Johannesburg, 2017; or via email at **complaints.IR@justice.gov.za**. We encourage you, however, to first reach out to us to attempt to resolve any issue directly before contacting the Regulator. We are committed to addressing any concerns and will investigate and respond to complaints.

9.7 **Right to Data Portability:** POPIA does not explicitly provide a broad data portability right akin to some other jurisdictions (like GDPR), but to the extent applicable, if you request, and it is feasible, we will provide you with your personal information that you provided to us in a structured, commonly used, machine-readable format so that you can transmit it to another service provider if desired. This typically would apply to data processed by automated means where you yourself provided the data (for example, if you uploaded a list of contacts to a platform we host, you might want that back in CSV format).

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9.8 **Right to Restrict Processing:** In some scenarios, you can ask us to restrict processing of your personal information (meaning we store it but don't use it) – for example, while we verify accuracy after you contest it, or if we no longer need the data but you want us to keep it for a legal claim. When processing is restricted, we will not process it except to store it or to deal with legal issues or with your consent.

9.9 **How to Exercise Your Rights:** You can exercise the above rights by contacting us using the contact details in Section 10. For certain self-service aspects (like opting out of emails), you can use the automated methods provided (unsubscribe links, account settings, etc.). When you contact us, please clarify which right you wish to exercise and the context, provide sufficient information for us to verify your identity (we need to ensure we're giving data to the correct person or altering data at the rightful owner's request), and be specific about your request (e.g., which information you want access to or which processing you object to). We will respond within a reasonable time – generally, we aim for no later than 30 days upon receiving a valid request (which is the time frame under POPIA), but we may extend that period with notice if the request is complex or numerous.

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10. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal information, please contact us. Our contact details for privacy matters are:

- **Information Officer:** Ryan Kichenbrand (CEO)
- **Email:** info@rytronix.co.za (Subject: Privacy Inquiry)
- **Telephone:** +27 87 821 3351 (ask for Privacy/Data Protection)
- **Postal Address:** 9 Adjutant Road, Elma Park, Edenvale, 1609, Gauteng, South Africa.

We will do our best to address and resolve any issues brought to our attention. If you are contacting us to exercise any of your rights (as outlined in Section 9), please provide enough detail for us to process your request efficiently.

Thank you for taking the time to read our Privacy Policy. We value your trust and are dedicated to protecting your personal information and privacy.

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