



**WIRES & WIRELESS**  
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# **WIRES AND WIRELESS (PTY) LTD**

## **PRIVACY POLICY**

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[www.wires.co.za/](http://www.wires.co.za/) [www.ageragroup.co.za](http://www.ageragroup.co.za)



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## 1. INTRODUCTION

Wires and Wireless respects the right to privacy and confidentiality of our potential and existing clients' personal information.

The Protection of Personal Information Act describes personal information as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. This includes data such as names, contact details and identity numbers.

This Policy explains how we obtain, use, and disclose our clients' personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA") and the Electronic Communications and Transaction Act ("ECTA").

At Wires and Wireless, we are committed to protecting our clients' privacy and to ensure that their personal information is collected and used properly, lawfully, and transparently.

Wires and Wireless reserves the right to amend this Privacy Policy or add provisions to it at any time by publishing an updated version on our website.

## 2. OBJECTIVE

The objective of this Policy is to ensure compliance with the Protection of Personal Information Act and the Electronic Communications and Transaction Act by:

- Setting out our strategy to uphold the rights to privacy and confidentiality of our clients' personal information.
- Notifying data subjects how we will handle personal information that we obtain.

## 3. INFORMATION WE COLLECT

Wires and Wireless collects personal information in various instances, including when:

- Data subjects contact Wires and Wireless or request information or services;
- Wires and Wireless provides services to data subjects;
- Persons apply for employment at Wires and Wireless;
- Persons use Wires and Wireless website or engage with Wires and Wireless through social media;
- Wires and Wireless may collect the information directly from a data subject or from third parties (such as regulators, government authorities and registries), or
- Personal and proprietary client information is submitted for business purposes.

The interaction with Wires and Wireless on the Wires and Wireless's website will result in the collection of information regarding the person's activities on the website. Similarly, when anyone engages with the Company via any one of Wires and Wireless's media platforms. This information includes, but is not limited to, the person's name, contact details and information regarding the matter with which they need assistance.

In the course of engaging with clients, Wires and Wireless will naturally be exposed to and collect personal and proprietary information which includes the data subject's name, ID/Passport number, addresses, contact details, and financial information as well as other necessary information.



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As part of its recruitment processes, Wires and Wireless collects information from graduates and employment applicants. This information includes educational information as well as employment history. By inquiring regarding employment opportunities at Wires and Wireless or applying for employment, applicants are deemed to provide their consent to Wires and Wireless's processing of their personal information for recruitment purposes, which may include screening as well as background and reference checks.

#### **4. PROCESSING OF PERSONAL INFORMATION**

Wires and Wireless may process personal information:

- to provide services to clients;
- to comply with legal or regulatory obligations;
- if a data subject has provided their consent, or
- if the processing is allowed by law.

The purposes for which Wires and Wireless processes personal information include, but are not limited to:

- marketing and promotion of Wires and Wireless services;
- providing and improving services to clients;
- improving users' experience when using the Wires and Wireless website;
- enabling Wires and Wireless's internal operations;
- supplier onboarding, or,
- client credit applications and information.

#### **5. INFORMATION SECURITY**

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that our client's personal information remains secure.

Our security procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information, and;
- Investigating and reacting to security incidents.

#### **6. DISCLOSURE OF INFORMATION**

We may disclose your information:

- where we have a duty or a right to disclose in terms of law, industry codes or a Court Order; or,
- where we believe it is necessary to protect our rights.



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The third parties to whom we disclose personal information include, but are not limited to:

- third party service providers to Wires and Wireless or its clients;
- government authorities and registries, organs of state, regulators, courts, tribunals, and law enforcement agencies.

## **7. TRANSFER OF PERSONAL INFORMATION**

Personal information collected by Wires and Wireless may be transferred to persons in other countries. Those countries' laws might not protect personal information in the same way or at the same level as the law in the data subject's country. However, Wires and Wireless will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

## **8. RETENTION OF PERSONAL INFORMATION**

Wires and Wireless retains personal information for as long as may be reasonably necessary in accordance with applicable law.

## **9. COOKIES**

Wires and Wireless's website makes use of cookies.

A website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.

## **10. DIRECT MARKETING**

Wires and Wireless may send marketing and promotional communications and material to persons. Recipients may opt-out from receiving such communications by contacting Wires and Wireless at the details provided below.

## **11. CLIENT'S RIGHTS**

### **11.1 ACCESS TO INFORMATION**

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/address as provided on our website and specify what information you require. We will need a copy of your ID/Passport document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

### **11.2 CORRECTION OF YOUR INFORMATION**

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID/Passport document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

### **11.3 RIGHT TO OBJECT**

In terms of Section 11(3) of the Protection of Personal Information Act you have the right to object to our processing of your personal information.



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You may object by sending a request in writing to [info@ageragroup.co.za](mailto:info@ageragroup.co.za).

#### **11.4 RIGHT TO COMPLAIN**

You have the right to lodge a complaint with the Information Regulator should you feel that your personal data was not handled in a responsible manner.

The complaint can be sent to the Information Regulator at:

JD House,  
27 Stiemens Street,  
Braamfontein,  
Johannesburg,  
2001

P.O Box 31533,  
Braamfontein,  
Johannesburg,  
2017

Or

[complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

#### **12. HOW TO CONTACT US**

If you have any queries about this Policy, need further information about our privacy practices, wish to withdraw consent, exercise preferences or access/correct your personal information, please contact us at the numbers/addresses listed on our website.

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**MR. B M SILBERMANN**  
**DIRECTOR**