

WEBTONIC PRIVACY NOTICE

Document Title:	Webtonic Privacy Notice
Document ID:	PRIV-FRM-IO-002
Version:	v1
Owner:	Information Officer
Approved By:	Finance Director
Effective Date:	2026-02-25
Next Review Date:	2027-02-01
Classification:	External

1. Purpose / Introduction

Webtonic Online Solutions (Pty) Ltd (“Webtonic”, “we”, “us”, “our”) is committed to protecting the privacy, confidentiality, and security of Personal Information entrusted to us.

This Privacy Notice explains how we collect, use, process, store, disclose, and protect Personal Information in accordance with:

- The Protection of Personal Information Act 4 of 2013 (“POPIA”), and
- The General Data Protection Regulation (EU) 2016/679 (“GDPR”), where applicable.

This Notice applies to Personal Information processed through our website, business operations, and services.

This Notice must be read together with our Terms of Service and any role-specific privacy notices (including Employee and Candidate Privacy Notices, where applicable).

2. Definitions

For purposes of this Privacy Notice:

- 2.1. **Personal Information** means information relating to an identifiable natural person and, where applicable, an identifiable juristic person, as defined under POPIA.
- 2.2. **Processing** means any operation performed on Personal Information, including collection, storage, use, disclosure, transmission, restriction, or deletion.
- 2.3. **POPIA** means the Protection of Personal Information Act 4 of 2013.
- 2.4. **GDPR** means Regulation (EU) 2016/679.
- 2.5. **Data Subject** means the individual to whom Personal Information relates.
- 2.6. **Webtonic**, “we”, “us” or “our” refers to Webtonic Online Solutions (Pty) Ltd, Registration Number 2017/146891/07, with its registered address in the Republic of South Africa.

3. Scope

This Privacy Notice applies to:

- Visitors to our website
- Prospective and existing clients
- Business partners and service providers
- Individuals who communicate with us
- Users of our services

Employees and job applicants are covered under separate dedicated privacy notices.

4. Information We Collect

We may collect and process the following categories of Personal Information:

4.1. Information You Provide Directly

- Name and surname
- Contact details (email address, telephone number)
- Company details
- Billing information
- Account credentials
- Correspondence and enquiries

4.2. Information Collected Automatically

- IP address
- Device information
- Browser type
- Operating system
- Website usage data
- Cookies and tracking data

4.3. Information from Third Parties

- Service providers
- Public sources
- Regulatory authorities
- Referral partners

We collect only Personal Information that is necessary, relevant, and proportionate to the purpose for which it is processed.

5. Purpose of Processing

We process Personal Information for the following purposes:

- Providing and managing our services
- Client onboarding and contract administration
- Communication and support

- Billing and financial administration
- Legal and regulatory compliance
- Fraud prevention and security
- Website analytics and service improvement
- Marketing communications (where permitted by law)

We do not sell Personal Information.

6. Lawful Basis for Processing

Where GDPR applies, processing is based on one or more of the following lawful bases:

- Performance of a contract
- Compliance with legal obligations
- Legitimate business interests
- Consent (where required)
- Protection of vital interests

Under POPIA, processing occurs where it is lawful, reasonable, and necessary to fulfil contractual, statutory, or legitimate business purposes.

Where consent is required, it may be withdrawn at any time, subject to legal or contractual limitations.

7. Sharing and Disclosure

We may share Personal Information with:

- Authorised employees
- IT and cloud service providers
- Payment processors
- Professional advisers
- Regulatory or law enforcement authorities
- Affiliated entities within our corporate structure

All third parties are required to:

- Maintain confidentiality
- Implement appropriate security measures
- Process Personal Information only for agreed lawful purposes

We conclude written agreements with operators/processors where required.

8. Cross-Border Transfers

Where Personal Information is transferred outside South Africa or the European Economic Area, such transfers will occur only where:

- The recipient country provides adequate protection; or
- Appropriate contractual safeguards are implemented; or
- The transfer is otherwise permitted by applicable law.

9. Security Safeguards

We implement appropriate technical and organisational measures to protect Personal Information, including:

- Access controls on a need-to-know basis
- Encryption where appropriate
- Secure hosting environments
- Network and system monitoring
- Incident response procedures

Despite reasonable safeguards, no system can guarantee absolute security.

10. Retention

Personal Information is retained only for as long as necessary to fulfil:

- Contractual obligations
- Legal and regulatory requirements
- Legitimate business purposes

Retention periods are governed by our Records Retention Schedule.

Upon expiry of the retention period, Personal Information is securely deleted or anonymised.

11. Data Subject Rights

Depending on applicable law, you may have the right to:

- Access your Personal Information
- Request correction
- Request deletion
- Object to processing
- Restrict processing
- Withdraw consent
- Lodge a complaint with a supervisory authority

Requests may be submitted to the Information Officer at info@webtonic.co.za. We may require identity verification before processing any request.

12. Cookies and Website Technologies

Our website uses cookies and similar technologies to:

- Enable website functionality
- Improve user experience
- Analyse traffic and usage patterns
- Support marketing initiatives (where permitted)

You may configure your browser to refuse cookies; however, certain website features may not function properly.

13. Children

Our services are not directed at individuals under the age of 18.

We do not knowingly collect Personal Information from children without appropriate parental or guardian consent.

14. Complaints and Contact Details

If you have concerns regarding the processing of your Personal Information, you may contact:

Information Officer

Webtonic Online Solutions (Pty) Ltd

Email: info@webtonic.co.za

Under POPIA, you may lodge a complaint with the Information Regulator of South Africa.

Under GDPR, you may lodge a complaint with the relevant supervisory authority in your jurisdiction.

15. Review and Updates

This Privacy Notice may be updated from time to time.

Material changes will be communicated via our website or other appropriate channels.

The latest version will always be available at www.webtonic.co.za.