



PRIVACY NOTICE

Prepared in terms of the Protection of Personal Information Act 4 of 2013 (POPIA)

FOR

DN23 & ASSOCIATES (Pty) Ltd

(Registration Number: 2023/763132/07)

DATE OF COMPILATION: 11/07/2023
LATEST ANNUAL REVISION: 11/07/2025
NEXT ANNUAL REVISION: 11/07/2026

READ THIS PRIVACY NOTICE CAREFULLY BEFORE YOU USE THIS WEBSITE OR USE ANY OF OUR SERVICES. YOUR CONTINUED USE OF THIS WEBSITE AND OUR SERVICES INDICATE THAT YOU HAVE READ AND AGREE TO THE TERMS OF THIS PRIVACY NOTICE. ALL SECTIONS OF THIS NOTICE ARE APPLICABLE TO USERS UNLESS THE SECTION EXPRESSLY STATES OTHERWISE.

1. GENERAL

- 1.1 At D23 & Associates, privacy and confidentiality are at the core of our operations.
- 1.2 We are committed to complying with the Protection of Personal Information Act 4 of 2013 (the Act) and to protecting your personal information and privacy, in that same is collected and used properly, openly, and lawfully.
- 1.3 This policy explains the basis on which any personal information that DN23 & Associates collect from you, or that you provide to DN23 & Associates, will be processed by DN23 & Associates.
- 1.4 Personal information may be processed only to the extent that the purpose of processing it is relevant, adequate not excessive.

2. COLLECTION OF PERSONAL INFORMATION

- 2.1 Dn23 & Associates will collect and process your personal information which may include names, contact details, financial and tax information, and other personal information required for the purposes of carrying out our services and performing in terms of our contract with you. This is done for the purpose of improving our service to you, to exchange correspondence with you and enhance our relationship with you.
- 2.2 The nature and type of information we require and collect depend on the purpose for which it is collected and used and consequently will only collect information for that purpose.

3. SECURITY OF YOUR DATA – PROCESSING AND TRANSFERRING OF PERSONAL INFORMATION

- 3.1 Personal information held by DN23 & Associates are processed by authorised persons for the purposes for which the information was provided, always ensuring that the information is not disclosed to an unauthorised third party.
- 3.2 Your personal information may be shared within the company and outside the country of your residence with IT service providers, professional advisors, and government bodies or industry regulators for the purposes of:
- 3.2.1 Complying with an obligation in terms of legislation or the Common Law;
 - 3.2.2 Any legitimate interest in the effective running of DN23 & Associates; or
 - 3.2.3 Fulfilling contractual obligations DN23 & Associates may have with you, while negotiating same.
- 3.3 Personal information must be readily accessible on request.
- 3.4 The designated Information Officer must decide, based on value and sensitivity, whether to grant access to the information, and is further required to store the information (if computerised), on network servers and have suitable access protocols.
- 3.5 Information stored on memory sticks must be encrypted and controlled, save for sensitive personal information, which must never be stored on memory sticks.
- 3.6 All third-party service providers must take the appropriate security measures to protect your personal information, and to use this information only for the purposes intended.
- 3.7 DN23 & Associates take all precautions to ensure the security and confidentiality of your personal information. Only persons within the company requiring your personal information for the performance of their work have access to your information, and your information is not transferred outside the company or your resident country unless DN23 & Associates are satisfied that the personal information will be afforded an equal level of protection in that other jurisdiction.
- 3.8 DN23 & Associates may have systems provided by third parties that host databases, our website, as well as survey companies and cloud storage. We request contractual assurances that personal information will be kept securely.
- 3.9 DN23 & Associates do not share or sell personal information.

4. SECURITY OF YOUR DATA - DATA RETENTION

- 4.1 DN23 & Associates undertakes that as far as it reasonably possible, we will not keep your personal information for a period longer than is needed and in compliance with applicable law.
- 4.2 Personal information shall be retained (in terms of duration) according to industry best practises.
- 4.3 Care must always be taken to ensure that effective security measures are in place for the disposal or deletion of information. Shredding of manual records is encouraged.
- 4.4 Retention periods in respect of information we hold are based on:
- 4.4.1 Legal obligations relating to minimum periods to retain data.
- 4.4.2 The purposes for which we process the personal information and whether we can achieve those purposes through other means.
- 4.4.3 Whether the information is required for reporting and analysis purposes relating to the business of DN23 & Associates.
- 4.4.4 The nature, amount, and sensitivity of the personal information.
- 4.4.5 The potential risk of harm resulting from unauthorised use or disclosure of that personal information.

5. YOUR RIGHTS - YOU MAY REQUEST:

5.1 Access

- 5.1.1 You may request access to your personal information (commonly known as a “data subject access request”), to, amongst others, check whether DN23 & Associates are processing your information according to the relevant applicable laws.

5.2 Correction

- 5.2.1 You may request correction of the personal information.
- 5.2.2 This enables you to have any incomplete or inaccurate information we hold about you corrected within a reasonable timeframe.

5.3 Deletion or destruction

- 5.3.1 You may request deletion or destruction of your personal information. We will, on request, delete personal information where there is no good reason to continue processing it.
- 5.3.2 You also have the right to ask us to delete or remove your personal information where you have raised an objection.

5.4 To object to processing

- 5.4.1 You may object to DN23 & Associates from processing your personal information where DN23 & Associates are relying on a legitimate interest (or those of a third party) and there is something about your situation that drives you to object to processing on this ground.
- 5.4.2 You also have the right to object where we are processing your personal information for direct marketing purposes.

5.5 Restriction of processing

- 5.5.1 You may request the restriction of processing of your personal information.
- 5.5.2 Processing of your personal information will then be suspended until such time that errors of your recorded information are remedied.

5.6 Transfer

- 5.6.1 You may request the transfer of your personal information to any third party, at any reasonable time.

5.7 To withdraw consent

- 5.7.1 You may request to withdraw consent initially given to DN23 & Associates.
- 5.7.2 Take note however that withdrawal will not affect the lawfulness of our use and processing of your information.

6. DETAILS OF THE INFORMATION OFFICER

- 6.1 Any information that may assist you in dealing with your personal information in terms of this privacy notice, may be accessed by contacting the designated Information Officer:

Mr D Abrahams

PostNet V&A Waterfront

PostNet Suite #61

Private Bag X9190

Cape Town, 8000

Email: david@dn23.co.za

6.2 DN23 & Associates undertake to respond to your requests within a reasonable timeframe and, where applicable, within statutory time-limits. In some instances, a fee may be payable for responding to your request.

6.3 Certain information is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege.

7. COMPLAINTS TO THE INFORMATION REGULATOR

7.1 Any person may submit a complaint to the [Regulator](#) in the prescribed manner and form ([Form 5](#)) alleging interference with the protection of the personal information of a data subject.


7.2 The Regulator must as soon as reasonably practicable, advise the complainant and the responsible party to whom the complaint relates of the course of action that the Regulator will take.

7.3 The Regulator may on its own initiative commence an investigation into the interference with the protection of the personal information.

7.4 Should you feel that your personal information has been violated, a complaint to the Regulator must be made in writing and sent to POPIAComplaints@infoeregulator.org.za

8. UPDATING OF THE PRIVACY NOTICE

8.1 The Information Officer, in collaboration with DN23 & Associates, will on a regular basis update this privacy notice.



Issued by

Dawood Abrahams

Chief Information Officer

Director: DN23 & Associates