Privacy Policy

Client Personal Information

1. **INTRODUCTION**

SIGMA INTERNATIONAL is a management consulting, project implementation and enterprise development organization, headquartered in Durban, Kwazulu-Natal. We have offices in Detroit (US), as well as satellite offices in Bushbuckridge (Mpumalanga), Ba-Phalaborwa (Limpopo) and Upington (Northern Cape). We are working with clients and other stakeholders within the province of Kwazulu-Natal, across all other provinces of South Africa, and internationally (specifically the United States).

SIGMA INTERNATIONAL is committed to protecting personal data. Our policy is to be transparent about why and how we process personal data. This Privacy Policy describes how **SIGMA INTERNATIONAL** ("us" and "we" refer to SIGMA INTERNATIONAL and its Management and staff) collects and processes personal information about you; how we use and protect this information, and your rights in relation to this information, in accordance with the requirements of the Protection of Personal Information Act (POPIA).

This Privacy Policy applies to all personal information we collect about you, for the purposes of our business processing activities. These include the following:

- Sigma International Management and Staff
- SMMEs and Corporates (and the individuals associated with these businesses)
- Government Departments and Agencies
- Personal clients
- Recruitment Applicants
- Suppliers (including sub-contractors and individuals associated with our suppliers and subcontractors)
- Professional advisors (consultants and legal advisors)
- Visitors to our offices
- Individuals whose personal data we collect, in relation to the consulting services we provide
- Individuals who visit our websites
- Marketing activities (including social media, mobile communication platforms, emails, website)
- Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified
- Others who contact us

2. **INFORMATION WE COLLECT**

We may collect your personal information from a variety of sources, including personal information we collect from you directly (e.g. when you contact us via e-mail, telephonic or physically, and we provide services to you), and information we collect about you from other sources, including commercially available sources, such as public databases (where permitted contractually/ by law).

Certain personal information is required as a consequence of any contractual relationship we have with you or your employer, or public sector institution or private sector institution, to enable us to carry out our contractual obligations to you or your employer, or public sector institution or private sector institution, respectively. Failure to provide this personal information may prevent or delay the fulfilment of these obligations.

1. **Information we collect directly from you**

The categories of personal information that we may collect directly from you include the following:

a. personal details (e.g. name, age, date of birth, gender, identity number or registration number);
b. contact details (e.g. phone number, email address, postal address or mobile number);
c. employment details (e.g. job title; employer name, employee number);
d. economic or financial information (e.g. details of income, financial statements or investment information).

Where possible, we will inform you what information you are required to provide us with and what information is voluntary.

2. **Information we collect from other sources**

The following are examples of the categories of personal information we may collect from other sources such as Public Institutions, the Companies and Intellectual Property Commission; Verification Agencies (for credit and reference checks), Internet Search Engines (such as Google, your website), Financial Institutions; SARS, include the following:

a. personal details (e.g. name, age, date of birth, gender, identity number, registration number);
b. contact details (e.g. phone number, email address, postal address or mobile number);
c. employment details (e.g. job title; employer name, employee number);

d. economic or financial information (e.g. details of income, financial statements or investment information).

3. USE OF PERSONAL INFORMATION

We must have a legal basis to process your personal information. We will only process your personal information for the purpose(s) for which it was collected and agreed with you.

In most cases the legal basis will be one of the following:

1. to provide services, to you, as set out and agreed with yourself;
2. to fulfil our contractual obligations to you, for example to ensure that invoices are issued correctly, to communicate with you and to carry out instructions and requests, and for ensuring you are able to access our premises when required;
3. to comply with our legal obligations to you, for example health and safety obligations while you are on any of our premises, or to a third party (e.g. to comply with a court order);
4. to meet our legitimate interests so that: we are able to provide the services you request; our services function correctly in relation to your business; any complaints or concerns can be promptly relayed to us; we can respond to any questions or concerns you might have; we may carry out research and analysis to ensure products and services we offer are relevant to you; our records are kept up to date and accurate, and; to send relevant and appropriate electronic correspondence to you in order to keep you informed regarding, but not limited to, industry developments which may impact you, and to invite you to events which are fundamental to the services which we provide.

We use your personal information to:

a. comply with obligations in terms of our mandate from you
b. carry out background, reference and credit checks prior to accepting you as an employee or client;
c. contact you with questions and other information regarding the services we are providing to you;
d. ensure that our records are kept accurate and up to date where you, your employees or contractors work on or visit our offices/ facilities;
e. ensure we issue accurate invoices for our services;
f. send you messages about products and services which we think will be of interest to you;
g. comply with legal obligations to which we are subject;
h. .

Sometimes we are authorised and/or required to collect and/or process personal information in accordance with applicable legislation.

1. YOUR RIGHTS

Please let us know if any of the personal information that we hold about you changes so that we can correct and update the personal information on our systems.

1. Right of access to information

You have the right to request, free of charge, confirmation as to whether we hold personal information about you. You also have the right to request a copy of the record of personal information or a description of the personal information we hold about you.

2. Right to request correction or deletion of personal information

You can request, where allowed by law, the correction, updating or deletion of the personal information held by us. You can also request, where allowed by law, the destruction or deletion of a record of information held by us.

3. Right to object to the processing of personal information

In certain circumstances, such as when we process your information for our or your legitimate interests, you may object to the processing of your personal information, unless we are required to process the information on another bases, such as a legal basis.

4. Right to ask us to share your personal information in a usable format with another entity

We can provide the personal information which you provided to us, to you or another person, in commonly used and machine-readable format.

5. Right to object to automated decision-making and profiling

Where we use automated decision-making or profiling to make decisions, you may object to this profiling. Alternatively, you may ask that a person review a decision made, or that you be provided with the logic around such a decision, so that you can make a representation in respect of the decision.

6. Right to unsubscribe from direct marketing

Where you do not wish to receive marketing communication from SIGMA INTERNATIONAL, you can unsubscribe from marketing emails by clicking on the unsubscribe link in each email.

We will still be able to contact you when there is important communication required to be sent.

7. Right to withdraw consent

Where you have given your consent to a particular type of processing, you may withdraw that consent at any time by contacting us using the contact details set out below.

8. Right to lodge a complaint with the information regulator

You have the right to lodge a complaint with the Information Regulator, in the prescribed manner and form, if you believe that we are interfering with the protection of your personal information. You can contact the Information Regulator on 010 023 5207 (telephone number) and can lodge a complaint via email on inforeg@justice.gov.za.

9. INFORMATION SHARING

In general, we do not share your personal information with third parties (other than service providers acting on our behalf or as service providers for whom we act on behalf of) unless we have a lawful basis for doing so.

We may transfer or disclose the personal data we collect to third party contractors, subcontractors, and/or their subsidiaries and affiliates, where we rely on third-party service providers to perform services on our behalf, such as consultancy & project management/ implementation services (various industries/ sectors), IT management of hardware and software (including data back-ups. Cloud storage solutions), CASEWARE (time management service provider), invoice and payment processing and other financial management requirements of SIGMA INTERNATIONAL, research and data analytics where required, as well as partner organizations (example as part of joint venture or consortium) of SIGMA INTERNATIONAL. We many also transfer or disclose the personal data with other professional advisors, such as legal advisors, to establish, exercise or defend our legal rights and obtain advise in connection with the management and operations of our business. This may mean that we have to share your personal information with these third parties. When we share your personal information in this way, we put in place appropriate measures to make sure that our service providers keep your personal information secure, in order to fulfil our contractual obligations to you.

4. **INFORMATION SECURITY**

We have implemented generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration or destruction. You may request a copy of our Information Security and Privacy Overview Policy from us using the contact details set out below.

We require all employees, (Management and staff) to keep personal information confidential and only authorised staff have access to this personal information.

We retain the personal data processed by us for as long as necessary for the purpose for which it was collected. Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

INFORMATION TRANSFER

Where it is necessary, for the purposes of processing, your personal information may be transferred outside of South Africa (example to SIGMA INTERNATIONAL offices based in the United States) in accordance with the appropriate data protection laws.

We anticipate that personal information may need to be transferred outside of South Africa for purposes of cloud storage, and where we do so, we will ensure that the necessary safeguards are in place to protect personal information.

5. **CONTACT US**

If you have questions or concerns regarding the way in which your personal information has been used, or should you have any questions about this Privacy Statement, please contact us and provide the details relating to your query.

6. **CHANGES TO THE PRIVACY POLICY**

You may request a copy of this Privacy Policy from us using the contact details set out above. We may modify or update this privacy notice from time to time. You will be able to see when we last updated the Privacy Policy Statement because we will include a revision date. Changes and additions to this Privacy Statement are effective from the date on which they are posted. Please review this Privacy Statement from time to time to check whether we have made any changes to the way in which we use your personal information.

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