

## UP COM SYSTEM (PTY) LTD T/A UP TIME Privacy Notice

### Introduction

This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

At Up Time we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

### Who we are

We are a dynamic organisation, specialising in strategic, tactical, leadership and technological Change Management, Team Efficiency and Executive Coaching.

### The type of personal information we collect

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements accordingly regarding a project and/or to acquire your expertise to assist our team in delivering a service. For this purpose we will collect contact details including your name and organisation.

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.

### How we use and process your information

We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal purposes. In terms of the Protection of Personal Information Act (POPIA), the justification ground which we base our processing on consist out of the following for example:

Information usage:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

Information processing:

- The processing is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party;
- The processing complies with an **obligation** imposed by law on the business;
- The processing protects a **legitimate** interest of the data subject;
- The processing is necessary for the proper performance of a **public law** duty by the business;
- The processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

### Disclosure of information

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights

### Information Security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized 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 your personal information remains secure.

Our security policies and procedures cover:

- Physical security as well as Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Monitoring access and usage of private information;

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

### **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/addresses as provided on our website and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information.

Request the destruction of your personal data. Nichola Berner the Information Officer will consider your request in light of any other laws or regulations prohibiting Up Time from destroying your personal data.

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

### **Correction of information**

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID 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.

### **Definition of personal information**

According to the definition of the act this means information relating to a living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act the following items as personal information is included:

- All addresses including residential, postal and email addresses.
- Change of name – for which we require copies of the marriage certificate or official change of name document issued by the state department.

We keep your information for 6 years and after such time the systems we use delete the files. ?

Please contact us at [info@up-time.co.za](mailto:info@up-time.co.za) if you wish to make a request.

### **Contact details:**

Nichola Jayne Berner | Phone Number: 010 141 0217 | E-mail: [info@up-time.co.za](mailto:info@up-time.co.za)  
Cube Workspace 9, The Straight, Pineslopes

### **How to complain:**

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@up-time.co.za](mailto:info@up-time.co.za).

You can also complain to the Information Regulator if you are unhappy with how we have used your Information.

### **Their contact details are as follows:**

#### **The Information Regulator (South Africa)**

33 Hoofd Street, Forum III, 3rd Floor Braampark  
P.O Box 31533  
Braamfontein, Johannesburg, 2017

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



**INFORMATION  
REGULATOR  
(SOUTH AFRICA)**

*Ensuring protection of your personal information  
and effective access to information*

## **REGISTRATION CERTIFICATE**

**Registration Number: 20707/2021-2022/IRRTT**

This is to certify that **Nichola Jayne Berner** and **Caroline Leslie Rampton** have been registered with the Information Regulator by **UP COM SYSTEMS (PTY) LTD T/A UP TIME** as the Information Officer and Deputy Information Officer respectively, in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 with effect from 07 June 2021.

**Chief Executive Officer  
INFORMATION REGULATOR**

**NB:** Please note that it is your responsibility to ensure that the particulars of an Information Officer and/or Deputy Information Officer(s) are correct and updated on an annual basis or as and when it becomes necessary.