OTSC
OCCUPATIONAL THERAPY SUPPORT CENTRE (PTY) LTD
Reg no: 2021/466735/07

6A Juan Singel, Baysvalley, Bloemfontein, 9301
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POPI 02.31 Privacy Notification to Data Subjects – Company Clients

OTSC's Privacy Notification to data subject (Clients) when collecting personal information.

Security of Information

Your privacy is important to us. To better protect your privacy, we provide this notice explaining our information practices and the choices you can make about the way your information is collected and used at this Company.

Confidentiality affects everyone: We collects, stores and uses large amounts of personal information every day, which may be paper-based or held on a computer.

We take precautions to keep the personal information disclosed to us secure, and we will not intentionally disclose such information to Third Parties for commercial purposes. To prevent unauthorized access, maintain personal information accuracy, and to ensure the appropriate use of information, we have put in place electronic safeguards, as well as internal organizational procedures to safeguard and secure the information that you provide.

Collection, Use and Disclosure of Personal Information

What personal information do we collect?

We collect and hold information such as (but not limited to) names, addresses (delivery/e-mail), contact information, occupations, ID Numbers, banking details, debit and credit card details, VAT Registration Numbers, contact details, Company Names, Company Registration Numbers, contact status, and any other information which assists us in conducting our business and complying with our legal obligations. We collect personal information for any transaction purpose, to administer any legal contractual purpose, to transact with clients and/or suppliers, for service delivery purposes, to handle complains, to help improve quality services and training, for the procurement process, to recover debt, for health and safety purposes, for compliance purposes, for record keeping purposes, and for business solutions, via business cards, telephone conversations, emails, responding to surveys or marketing communications,

registering and transacting on our website and from Third Parties. We may collect and hold information from former, current and prospective clients, our suppliers and their employees, as well as contractors and others.

It is essential that we have accurate and up to date information about you so that we can give you the best possible service, assistance, advise, training, and/or any business solution. Please check that your personal details are correct whenever you visit us and inform us of any changes. This minimises the risk of you not receiving important correspondence.

Purpose for which the information is being collected.

The cardinal purpose for which we process your Personal Information is to ensure that we can provide you with exemplary services with regards to Human Asset Management, Business Solutions and/or Training that makes your experience in dealing with us efficient and hassle-free.

Further to the above, we may process your Personal Information, for among other things, the following:

- for the procurement process, which involves every activity involved in obtaining the service we need to support our daily operations, including sourcing, negotiating terms, and by keeping record of all the steps in the process;
- to help us to improve the quality of our services;
- for training delivery purposes;
- for record keeping and compliance purposes;
- to administer legal contractual purposes;
- to transact with suppliers;
- to recover debt;
- to give effect to any communication received from you, which may include instructions, requests, queries, complaints, and questions;
- to update our records and/or your contact details;
- for Health and Safety purposes;
- to conduct market research;
- to compile statistical and/or data analyses;
- for the administrative, marketing (including direct marketing), planning, business or service development, quality control, survey and research purposes of us, it's and our related associates, contractors and employees or service provider; and
- generally, to render our Services in Human Asset Management, Business Solutions and Training.

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For the avoidance of doubt, the Personal Information shall be exclusively collected for the specific, explicitly defined and lawful purpose of conducting our business.

The Company may also disclose your Personal Information for law enforcement and other legitimate reasons, although we shall do our best to assure its continued confidentiality to the extent possible.

Is the supply of the information voluntary or mandatory?

Supplying of certain types of information is mandatory.

- If you,
  - refuse to provide your personal information which we request;
  - do not consent to us handling your personal information in accordance with this Privacy Notice; or
  - revoke any consent regarding the handling of your personal information by us which you have previously given,

  then such refusal or revocation of previously given consent might prevent us from performing our services, and this might in turn, depending on your circumstances, adversely affect you.

Transfer the information to a third country

We may transfer your information to a Cloud database outside your country of domicile, potentially including countries which may not require an adequate level of protection for your Personal Information compared with that provided in your country.

Limits on collection

We collect only the information that is required to provide service, administrate the service that is provided, and communicate with you. We do not collect any other information, or allow information to be used for other purposes, without your express (i.e., verbal or written) consent - except where authorized to do so by law.

Third-party Payment Providers and Payment Security

Our Website may provide links, redirects or access to Third-party Payment Service Providers, including PayPal and PayFast, for the purpose of processing payments for products and services purchased through this Website.

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When you select a Third-party Payment Method, you may be redirected from our Website to the website, payment page or payment environment of the applicable Third-party Payment Provider. From the point at which you leave our Website and access the Third-party Payment Environment, the collection, processing, storage and security of payment information and any Personal Information submitted directly to that Third-party Provider are subject to that Provider's own terms, conditions, privacy policy and security measures.

OTSC does not request, collect, store or have access to the full credit card, debit card, banking or other payment credentials submitted directly by a Purchaser to the Third-party Payment Provider, unless expressly stated otherwise.

Accordingly, OTSC does not control the Third-party Payment Provider's website, systems, networks, security measures, data-processing practices or information-security environment and cannot guarantee the security, availability or integrity of any information submitted directly to such Third-Party Provider.

To the extent permitted by applicable law, OTSC shall not be responsible or liable for any unauthorised access, security breach, cyberattack, fraud, interception, loss, theft, misuse, disclosure or compromise of Personal Information, payment information, credit card information, debit card information, banking information or other information submitted directly by a Purchaser to a Third-Party Payment Provider, where such event occurs within or as a result of the systems, networks, website or services of that Third-party Provider and is outside the reasonable control of OTSC.

Purchasers acknowledge and agree that they access and use Third-party Payment Services at their own risk and are responsible for familiarising themselves with the applicable Third-party Provider's terms and privacy policy before submitting any payment or Personal Information.

Any concerns relating specifically to payment-card information, payment credentials, payment-account security, fraudulent transactions or a security incident occurring within a Third-party Payment Provider's environment should be reported *directly* to the relevant Payment Provider and/or the Purchaser's Financial Institution.

Nothing in this clause excludes or limits any liability, duty or obligation which OTSC is prohibited by law from excluding or limiting, including any obligation imposed on OTSC under applicable data-protection, consumer-protection or other legislation.

Third-party Payment Processing

Where a Purchaser elects to pay for products or services using PayPal, PayFast or another Third-Party Payment Service Provider, the Purchaser may be redirected to the relevant Third-party Payment Provider's website or secure payment environment.

OTSC does not ordinarily collect or store the Purchaser's full credit or debit card details, CVV/CVC numbers, PINs or online banking credentials. Such information is submitted directly to the applicable Payment Service Provider and is processed in accordance with that Provider's own privacy policy, terms and conditions and applicable security requirements.

OTSC may receive limited transaction-related information from the Payment Provider, such as confirmation of payment, transaction reference, payment status, purchaser identification and other information necessary to fulfil the Purchaser's Order.

OTSC is not responsible for the processing, storage or security of Personal Information or payment information collected directly by a Third-party Payment Provider, nor for any security incident occurring exclusively within the systems or infrastructure of such Provider and outside the reasonable control of OTSC.

Purchasers are encouraged to review the applicable Third-party Payment Provider's privacy notice and terms and conditions before submitting payment information.

When and to whom do we disclose personal information?

Disclosure to our associates and sub-contractors

Your personal information may be shared with our associates, sub-contractors and/or selected Third Parties who process the information on our behalf.

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Disclosure to Third Parties

We may also disclose your personal information to Third Parties under certain circumstances. If you do not wish us to disclose this information to Third Parties, please contact us at the contact details set out above. We may, however, not be able to provide business solutions, services and/or training to you if such disclosure is necessary.

Disclosures authorized by law:

There are limited situations where we are legally required to disclose your personal information without your consent. These situations include (but are not limited to) reporting any illegal or fraudulent activities, scams or by court order.

Disclosures to all other parties:

Your express consent is required before we will disclose your information to Third Parties for any purpose other than to provide you with assistance or unless we are authorized to do so by law. Examples of disclosures to other parties requiring your express consent include (but are not limited to) Third Party training institutes, debt collectors, attorneys etc.

Can you withdraw consent?

You can withdraw your consent to have your information shared with other Third Parties at any time, except where the disclosure is authorized by law.

Client Rights

How do you access the personal information held by this office?

You have the right to access your record in a timely manner. If you request a copy of your record, one will be provided to you at a reasonable cost. If you wish to view the original record, one of our staff must be present to maintain the integrity of the record, and a reasonable fee may be charged for this access. Client requests for access to their record can be made in writing to our Information Officer in terms of our Promotion of Access to Information Act, Section 51 Manual (see office address at bottom of this Notification).

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Limitations on access

In extremely limited circumstances you may be denied access to your records, but only if providing access would create a significant risk to you or to another person.

What if you feel your record is not accurate?

We make every effort to ensure that all your information is recorded accurately. If an inaccuracy is identified, you can request that a note be made to reflect this on your file/profile.

Office Safeguards

How secure is your information?

Safeguards are in place to protect the security of your information. These safeguards include a combination of physical, technological and administrative security measures that are appropriate to the sensitivity of the information. These safeguards are aimed at protecting personal information against loss or theft, as well as unauthorised access, disclosure, copying, use or modification.

What is our communications policy?

We protect personal information regardless of the format. Specific procedures are in place for communicating by phone, email, fax, and post/courier.

How long do we keep information?

We retain records as required by law and professional guidelines.

How do we dispose of information when it is no longer required?

When information is no longer required, it is destroyed in a secure manner, according to set procedures that govern the storage and destruction of personal information.

Complaints process

If you believe that this office has not replied to your access request or has not handled your personal information in a reasonable manner, please address your concerns first with our Information Officer. You may also choose to make a complaint to the Information Regulator.

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Information Officer

Name:	Juané Raats
Tel No:	**067 397 2076**
Email:	training@otsc.co.za

Information Regulator

Address:	33 Hoofd Street; Forum III, 3rd Floor Braampark
Tel No:	+27 (0) 10 023 5200
Email:	complaints.IR@justice.gov.za
Web Address:	https://www.justice.gov.za/inforeg/contact.html