



## Privacy Statement

We, Soma Initiative (Pty) Ltd, have a strong commitment to respecting concerns regarding privacy and will process all personal information in alignment with the provisions of the ***Protection of Personal Information Act 4 of 2013*** (hereinafter referred to as POPIA) and any further prevailing legislation.

All personal information furnished, whether voluntarily or mandatorily, and processed by us regardless of form or medium in which the information is supplied shall be processed in accordance with the provisions set out hereunder.

### Collecting Personal Information:

We offer a range of services and therefore obtain personal information directly from data subjects and third parties which collection complies with the requirements of lawful processing required in terms of POPIA.

The aforementioned personal information is collected in order to liaise with you telephonically, via email, per post and/or via our website so that we may:

1. respond to any query or comment received from you;
2. inform you of new services;
3. enable us to process, validate and verify information and requests for the supply of services;
4. for the purposes for which you specifically provided the information; and
5. generally to improve your experience on our website.

### Minors:

We do not intentionally collect personal information from minor children. If you are the parent or guardian and believe your minor child has provided us with personal information, please contact us at the address below to request the deletion thereof.

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#### Head Office: Western Cape

Block E, Greenford Office Estate, Punters Way, Kenilworth, 7700  
PO Box 2475, Clareinch, 7740

**Tel:** (021) 670 6920    **Fax:** (021) 670 6930

#### Regional Office: Gauteng

Building 15, Pinewood Office Park, 33 Riley Road, Woodmead, 2128  
PO Box 172, Gallo Manor, 2052

**Tel:** (011) 844 9100    **Fax:** (011) 844 9111

**Directors:** Dr Douglas Baard

**Reg. No:** 2000/025255/07

## Processing of Information:

We will share your personal information:

1. in order to comply with applicable law or with legal process served on our company;
2. in order to protect and defend the rights or property of our company; and
3. with employees and/or third parties who assist us in providing services to you and thus require your personal information in order to render a proper and efficient service. We will ensure that all such employees and third party service providers, having access to your personal information, are bound by confidentiality agreements.

In accordance with the provisions of the POPIA, we process personal information where:

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

## Collection of Information by “Cookies”

You are aware that information and data is automatically collected through the standard operation of the internet servers and through the use of "cookies." "Cookies" are small text files a website can use to recognise repeat users, facilitate the user's ongoing access to and use of the website and allow a website to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. Cookies are not programs that come onto your system and damage files. Generally, cookies work by assigning a unique number to you that has no meaning outside the assigning site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you with certain features (e.g., customized delivery of information) available on our website.

## Security Measures:

We will:

1. treat your personal information as strictly confidential;
2. take appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
3. promptly notify you if we become aware of any unauthorised use, disclosure, or processing of your personal information; and
4. provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable request.

**Retention:**

We will not retain your personal information longer than the period for which it was originally required, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

**Selling Personal Information:**

We do not sell the information and will only share same with service providers as set out herein.

**Your rights:**

You have the right at any time to:

1. access your personal data by sending a written request to our Information Officer who's contact details are set out below. We may charge you a fee for this service;
2. request us to correct or supplement any of your personal data which we will undertake as soon as practicable;
3. request the return or destruction of Personal Information. We will consider your request in light of any other laws or regulations prohibiting us from destroying your personal data; and
4. lodge a complaint with the company.

**Changes:**

We may update this privacy notice from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

**Promotion of Access to Information Act:**

In compliance with the provisions of the *Promotion of Access to Information 2 of 2002 (PAIA)*, a copy of our manual is available for your perusal at [www.soma-i.co.za](http://www.soma-i.co.za) and at Soma Terrace, Block E, Greenford Office Estate, Punters Way, Kenilworth, 7708, Western Cape, Republic of South Africa.

**Contact:**

For more information about our privacy practices, if you have questions, or if you would like to lodge a complaint, please contact our Information Officers, Ms Anita Paulse or Ms Marianne Lancefield, in writing, via e-mail at [apaulse@soma-i.co.za](mailto:apaulse@soma-i.co.za) or [mlancefield@soma-i.co.za](mailto:mlancefield@soma-i.co.za).

If you are not satisfied with our response to your complaint, you have the right to lodge your complaint with:

**THE INFORMATION REGULATOR (SOUTH AFRICA) SITUATED AT: JD HOUSE, 27 STIEMENS STREET, BRAAMFONTEIN, JOHANNESBURG, 2001.**

**COMPLAINTS:** [POPIAComplaints.IR@justice.gov.za](mailto:POPIAComplaints.IR@justice.gov.za) or [PAIAComplaints.IR@justice.gov.za](mailto:PAIAComplaints.IR@justice.gov.za)

**GENERAL QUERIES:** [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

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