

Privacy Policy (POPIA)

Document Control

Field	Value
Approval	v1.3 approved at the Board meeting of 01 August 2025.
Effective Date	01 August 2023
Revised Date	July 2026
Version	1.4
Owner	Information Officer

Overview

AdviceTech (Pty) Ltd (AdviceTech) provides a practice management software platform to financial services businesses in South Africa. This notice explains how we handle personal information, in line with the Protection of Personal Information Act 4 of 2013 (POPIA) and the Promotion of Access to Information Act 2 of 2000 (PAIA). It is our public privacy notice for the purposes of POPIA's openness condition.

1. Who we are

AdviceTech (Pty) Ltd

Physical and postal address: Unit 16B, Willowbrook Office Park, Van Hoof Street, Ruimsig, Roodepoort, 1724

Telephone: +27 10 593 8025

Email: info@advicetech.co.za

Website: www.advicetech.co.za

2. Our two roles under POPIA

AdviceTech processes personal information in two distinct capacities.

As operator. Financial services businesses (our clients) use the AdviceTech platform to manage their practices. The personal information of their customers that they load onto or process through the platform is controlled by them: they are the responsible parties,

they determine the purposes, and we process that information only on their documented instructions under our contracts with them. Questions or requests about that information should be directed to the financial services business concerned; any request we receive directly is assessed under POPIA and PAIA in consultation with that client, and we will assist them in responding.

As responsible party. We determine the purposes of processing for our own business information: contact details of people at our clients and prospective clients, website and support enquiries, supplier and contractor contacts, marketing lists, and the personal information of our own employees, contractors and job applicants.

3. What we collect and where it comes from

Where we act as responsible party, we collect: names and contact details (email addresses, telephone numbers, business addresses); role and organisation details for client, prospect and supplier contacts; billing and account administration information; support and service correspondence; website enquiry details submitted to us; and, for employees, contractors and job applicants, the recruitment, screening, employment and payroll information described in our internal policies, collected with the knowledge of the person concerned. Visitors to our premises are recorded on CCTV at office access points for security purposes; footage is kept for 30 days unless preserved for an incident.

We collect this information directly from the person concerned, from the organisation they represent, or, for candidate screening, from an accredited screening bureau with the candidate's consent.

Where we act as operator, the categories of information are determined by our clients and typically include the identity, contact, financial-planning and related information of their customers, including identity numbers and financial details, which we protect as high-risk confidential personal information.

Providing the information we request for a contract, account or enquiry is voluntary, but without it we may be unable to provide the service, respond to the enquiry, or conclude the contract.

4. Why we process it

As responsible party, we process personal information to: provide, support and bill for the AdviceTech platform; administer our client, prospect and supplier relationships; respond to enquiries; send service communications; send electronic direct marketing

about our own services only where POPIA section 69 permits it, that is with your consent, or where you are an existing customer, your details were obtained in the context of a sale of a similar service, and you were given the opportunity to object at collection and are given it in every message; recruit, screen (proportionate to the role) and employ staff and contractors; comply with legal obligations, including tax and employment law; and establish, exercise or defend legal claims. Processing rests on the applicable POPIA justification in each case: performance of a contract, compliance with a legal obligation, our legitimate interests, or consent where consent is the appropriate ground.

As operator, we process platform data solely to deliver the contracted services to our clients and on their instructions.

5. Who we share it with

We use a small set of service providers to run our business and platform, under written contractual or provider-standard data-protection terms verified through our vendor due diligence: hosting and infrastructure (Xneelo, Samrand data centre, Gauteng), cloud document and backup storage (Microsoft Azure, South African regions), productivity, identity and email (Microsoft 365), DNS and network security services (Cloudflare), AI processing (Anthropic, under our AI Usage Policy and a data processing agreement), and providers of password management, security scanning, accounting, payroll and candidate screening services. We may also disclose personal information where the law requires or permits it, including to regulators, law enforcement (verified through our Information Officer) or professional advisors.

We do not sell personal information.

6. Cross-border processing

Client data processed on the platform, including documents and encrypted backups, is stored within South Africa (Johannesburg, with geo-redundant replication to Cape Town). Two limited categories of processing take place outside South Africa: Microsoft 365 may process limited staff and account metadata in Microsoft's global infrastructure, and approved AI processing under our AI Usage Policy is performed by Anthropic outside South Africa under a data processing agreement with no-training terms. These transfers take place under written data-protection terms with each provider, relying on the POPIA section 72 safeguards recorded in our internal Data Protection and Privacy Policy and vendor register.

7. Security

We protect personal information through documented technical and organisational measures, including encryption of data at rest and in transit, access controls with multi-factor authentication, network security controls, logging, backup and documented recovery arrangements, and a vetted supplier framework. No system is immune to breach. Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person: if we are the responsible party for that information, we will notify the Information Regulator and affected data subjects as soon as reasonably possible under POPIA section 22; if we hold the information as operator for a client, we will notify that client immediately and assist it, and the client, as responsible party, is responsible for notifying the Regulator and affected data subjects.

8. Retention

We keep personal information only as long as the purpose, the contract, the law or a legitimate business record requirement demands, per our internal retention schedule. Client data on the platform is returned and deleted at the end of the client contract under a documented export-and-deletion process.

9. Your rights

Subject to POPIA's conditions, you have the right to: be informed that we hold your personal information; request access to it; request correction of inaccurate information; request deletion where we are no longer entitled to retain it; object to processing, including for direct marketing; opt out of direct marketing at any time using the unsubscribe mechanism in any marketing message or by contacting us; and complain to the Information Regulator. On request, and as an additional service where feasible, we can provide account data in a structured electronic format.

We do not make decisions with legal effect about a data subject by automated means alone. Requests are handled through the Information Officer and answered within 30 calendar days, extendable where the legislation permits; we may require proof of identity.

10. Information Officer and Deputy Information Officer

Information Officer: Peter James Hewett (Registration 6561/2021-2022/IRRTT)

Deputy Information Officer: Johan Bester

Both are contactable at our head office: telephone +27 10 593 8025, email info@advicetech.co.za, Unit 16B, Willowbrook Office Park, Van Hoof Street, Ruimsig, Roodepoort, 1724.

Complaints to the Information Regulator (South Africa): Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191; telephone 010 023 5200 (toll free 0800 017 160); POPIAComplaints@infoforegulator.org.za; <https://infoforegulator.org.za/>.

11. Updates to this notice

We review this notice at least annually and publish any changes on our website. The version and history below are the controlled record.

12. Document History

Version	Date	Summary of Change
1.3	August 2025	Approved version.
1.4	July 2026	Owner assigned; Information Regulator notification under POPIA section 22 added (s8); response timeframe aligned to the statutory 30-day position (s9). Operator and responsible-party roles distinguished (s2); collection, sources, purposes and recipients restated to actual practice (s3 to 5); mandatory and voluntary collection consequence stated (s3); cross-border processing restated per the internal section 72 assessment (s6); machine-readable portability restated as a contractual service, not a statutory right, and the automated-decision position stated (s9); Information Regulator complaint route added (s10). For Information Officer sign-off before publication. External review round 2 (July 2026); direct-marketing wording aligned to the POPIA section 69 consent and existing-customer conditions, since opt-out alone does not constitute consent; breach notification split between responsible-party and operator roles, with the client owning Regulator and data subject



		notification for operator-held information; operator-data requests stated as assessed in consultation with the client; CCTV at premises disclosed.
--	--	---