Privacy Policy

Version:	V2.00
Effective Date:	2026-04-07
Approved by:	Stefanie Erasmus (Director)

1.	**Introduction**
	AEE Logix (PTY) Ltd ("the Company") is committed to protecting personal information in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"). This Privacy Policy explains: • what personal information we collect; • how and why we process it; • with whom it is shared; • how it is protected; and • the rights of data subjects. This Policy applies to all persons who interact with the Company.
2.	**Lawful Basis for Processing Personal Information**
	The Company processes personal information lawfully and fairly in accordance with POPIA and not solely on the basis of consent. Personal information is processed where: • processing is necessary to perform or conclude a contract; • processing is required by law; • processing is necessary for legitimate business interests; or • consent has been provided, where required. Where consent is relied upon, it may be withdrawn at any time, subject to legal or contractual limitations.
3.	**Personal Information We Collect**
	The Company may collect personal information as defined in POPIA, including but not limited to: • names and contact details; • billing and payment information; • credit-related information (where credit is applied for); • correspondence and communications; and • employment or contractor information (where applicable). Where special personal information is processed, this is done strictly in accordance with POPIA Sections 26–35, with appropriate safeguards.
4.	**How Personal Information Is Collected**

	Personal information may be collected: • directly from you (e.g. enquiries, contracts, service requests); • through Company websites or electronic communication; • from third parties such as credit bureaus, where lawfully permitted; or • where required or authorised by law.
5.	**Purposes For Which Personal Information Is Used**
	Personal information is processed for legitimate business purposes, including: • providing services and products; • managing customer and supplier relationships; • issuing quotes, invoices, and managing accounts; • facilitating credit agreements (where applicable); • legal and regulatory compliance; • internal administration and auditing; and • managing employees and contractors. Personal information will **not** be used for unrelated purposes without lawful justification.
6.	**Sharing Of Personal Information**
	The Company may share personal information with: • professional service providers (e.g. accountants); • credit bureaus, where credit is applied for; • employees and appointed operators who require access to perform their duties; and • regulatory or law-enforcement bodies where required by law. All operators processing personal information on behalf of the Company do so under appropriate confidentiality and security obligations, in compliance with POPIA Section 20. The Company does not sell personal information or share it for third-party marketing purposes.
7.	**Retention, De-Identification, and Destruction**
	Personal information is retained only for as long as necessary for lawful purposes, including where: • retention is required or permitted by law; • retention is required for contractual obligations; or • retention is necessary for legitimate business purposes. Once retention is no longer justified, personal information is securely destroyed or permanently de-identified in accordance with POPIA and the Company's Retention and Destruction Policy.
8.	**Security Safeguards**
	The Company implements appropriate, reasonable technical and organisational measures to protect personal information against loss, unauthorised access, disclosure, alteration, or destruction, as required by Section 19 of POPIA. While reasonable safeguards are in place, no transmission method is entirely secure, and absolute security cannot be guaranteed.
9.	**Security Breaches**

	In the event of a security compromise involving personal information, the Company will assess the incident and, where required, notify: • the Information Regulator; and • affected data subject(s), as soon as reasonably possible, in accordance with Section 22 of POPIA.
10.	**Data Subject Rights**
	Data subjects have the right to: • request access to personal information held by the Company; • request correction, deletion, or destruction of inaccurate or unlawful personal information; • object to processing in certain circumstances; and • lodge a complaint with the Information Regulator. Requests may be submitted to the Company's Information Officer using the prescribed request process (Annexure B).
11.	**Direct Marketing**
	The Company does not conduct unsolicited direct marketing. Should this position change, appropriate consent mechanisms will be implemented and this Policy updated accordingly.
12.	**Cross-Border Transfers**
	Should personal information be transferred outside the Republic of South Africa, the Company will ensure that: • the recipient is subject to laws or agreements that provide equivalent protection; or • appropriate safeguards are implemented, in compliance with POPIA Section 72.
13.	**Changes to Policy**
	This Privacy Policy may be updated from time to time to reflect changes in legal, regulatory, or business requirements. The most recent version will always be made available.
14.	**Contact Details – Information Officer**
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