

# Privacy Policy

## Document Control

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<b>Prepared by:</b>	Elizma Els

## Version History

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Approved by</b>	<b>Brief Description of Changes</b>
1	05/06/2026	Elizma Els	CEO	First Version

## 1. Purpose of this Privacy Policy

This Privacy Policy explains how Boxfusion collects, uses, stores, shares, protects and otherwise processes personal information in accordance with the Protection of Personal Information Act, 4 of 2013 (POPIA), the Promotion of Access to Information Act, 2 of 2000 (PAIA), applicable South African laws, client contracts and internal information governance requirements.

Boxfusion provides software systems, implementation, support and related technology services to government and other clients. In some cases, Boxfusion may process or access information relating to citizens, government employees, employees, candidates, suppliers, system users and children, depending on the relevant client system, module, project or contract.

## 2. Scope

This Privacy Policy applies to personal information processed by Boxfusion in relation to:

- website visitors and people who contact us through our website or other channels;
- clients, client representatives and government client contacts;
- software users, system users and support users;
- citizens or members of the public whose information may be processed in client systems;
- government employees whose information may be processed in government-facing systems;
- children, where information is processed in specific client systems or HR benefit contexts;
- employees, candidates, contractors and former employees;
- suppliers, service providers, partners and other business contacts.

This Policy applies whether information is processed electronically, in paper form, through software systems, support channels, cloud services, email, collaboration tools, HR systems, project folders, ticketing systems, analytics tools or other business systems.

## 3. Responsible Party and Contact Details

For its own business operations, Boxfusion is generally the responsible party for personal information, it determines the purpose and means of processing. Where Boxfusion processes information on behalf of a client, including a government client, Boxfusion may act as an operator or service provider under the relevant contract or instruction.

Contact item	Details
Responsible party	Boxfusion (Pty) Ltd
Information Officer	Xolile Ndlangana - CEO

Deputy Information Officer(s)	Elizma Els - COO
Privacy / POPIA email	privacy@boxfusion.io
PAIA request email	privacy@boxfusion.io
Physical address	International Business Gateway, New Rd, Midridge Park, Midrand, 1685
Website	<a href="https://boxfusion.io/">https://boxfusion.io/</a>

#### 4. Personal Information we may process

The categories of personal information Boxfusion may process depend on the relationship, service, system, contract and business purpose involved. Personal information may include:

- identifying information, such as names, surnames, identity numbers, passport numbers, employee numbers and user IDs;
- contact information, such as email addresses, phone numbers, addresses and organisation details;
- employment information, such as job titles, contracts, payroll information, leave records, performance records, training records and disciplinary or grievance records;
- candidate information, such as CVs, qualifications, interview notes, assessments, references and recruitment correspondence;
- client and supplier information, such as contact details, contracts, invoices, tax, banking and procurement records;
- system information, such as usernames, access roles, login records, audit logs, support tickets, screenshots, workflow actions and reports;
- citizen information, where processed in government client systems or related support/project contexts;
- government employee information, including system access, role, workflow, approval and support information;
- children's information, where applicable in certain client systems or employee benefit/dependant contexts;
- special personal information, where lawfully required, such as health, disability, biometric, race or Employment Equity information;
- website and communication information, such as enquiries, communication preferences, IP information, cookies and analytics information where applicable.

#### 5. Why we process Personal Information

- to provide software systems, implementation, support and professional services;
- to manage client relationships, contracts, service levels, projects and support requests;
- to configure, test, maintain, troubleshoot and support systems where authorised;
- to manage user access, security, authentication, audit logs and system administration;

- to respond to enquiries, proposals, tenders, client requests and legal or regulatory requirements;
- to manage employees, contractors, recruitment, payroll, benefits, training and HR processes;
- to administer medical aid, retirement fund, payroll, tax and employment-related benefits;
- to manage suppliers, procurement, payments, audits and financial administration;
- to manage POPIA, PAIA, data subject requests, access-to-information requests and complaints;
- to investigate incidents, security events, misconduct, disputes, legal claims or regulatory matters;
- to comply with laws, contracts, court orders, regulator requirements and government-client obligations;
- to improve systems, services, training, operations, security and governance, using aggregated or anonymised data where possible.

## **6. Lawful basis for Processing**

Boxfusion will process personal information only where there is a lawful basis to do so. Depending on the context, this may include:

- the data subject has consented, where consent is required and appropriate;
- processing is necessary to perform a contract or take steps before entering into a contract;
- processing is necessary to comply with a legal obligation;
- processing is necessary to protect a legitimate interest of the data subject;
- processing is necessary for the proper performance of a public law duty by a public body, where applicable;
- processing is necessary for pursuing the legitimate interests of Boxfusion, a client or a third party, provided this is lawful and balanced against the rights of the data subject.

## **7. Government Client Systems and Operator Role**

Where Boxfusion provides software systems or services to government clients, some information may belong to or be controlled by the relevant government client. Boxfusion may process or access such information only as authorised by the applicable contract, statement of work, service level agreement, data processing arrangement, client instruction or applicable law.

This may include information relating to citizens, government employees, service requests, applications, workflow actions, reports, exports, audit logs, support tickets or implementation records. Requests for access to government client records may need to be referred to, or assessed with, the relevant government client before any information is released.

## 8. Children's Information and Special Personal Information

Boxfusion treats children's information and special personal information as high-risk. Such information will only be processed where there are a lawful basis, proper authorisation and appropriate safeguards.

- Children's information may arise in certain government client systems, HR dependant/benefit contexts or specific project environments.
- Special personal information may include health information, disability information, biometric information, race or Employment Equity information, criminal behaviour information, trade union membership, religious or political information, or similar sensitive categories.
- Access to such information is restricted to authorised people who need it for a lawful purpose.
- Where possible, such information will be minimised, masked, anonymised, aggregated or restricted.

## 9. Direct Marketing and Communications

Boxfusion may use contact information to communicate about services, events, updates, enquiries or business matters, where lawful. Marketing communications will be managed in accordance with applicable consent, opt-out and unsubscribe requirements. Recipients may opt out of direct marketing communications using the unsubscribe or opt-out mechanism provided, or by contacting Boxfusion.

## 10. Cookies, Website and Analytics

Boxfusion's website may use cookies or analytics tools to operate the website, understand usage, improve user experience and respond to enquiries. Where required, Boxfusion will provide cookie notices or settings and will process website information in accordance with this Privacy Policy and applicable law.

### Implementation note

Marketing / IT should confirm actual cookies, analytics tools, website forms and tracking technologies before this section is published.

## 11. Who we may share Personal Information with

Boxfusion may share personal information with authorised recipients where necessary and lawful, including:

- employees, contractors and authorised internal teams who need access for their roles;
- government clients and authorised client representatives;
- payroll, medical aid, retirement fund, insurance and employee benefit providers;
- recruitment, verification and training providers;
- banks, auditors, tax advisors, legal advisors and professional service providers;
- SARS, Department of Employment and Labour, SETAs, B-BBEE verification agencies and regulators where required;

- hosting providers, cloud service providers, software vendors, IT/security providers and support platforms;
- approved subcontractors, implementation partners or operators;
- courts, law enforcement or regulators where legally required.

Boxfusion will not sell personal information to third parties.

## **12. Cross-Border Transfers**

Boxfusion may use cloud services, SaaS platforms, hosting providers, support tools or technology vendors that may involve storage, access or processing of information outside South Africa. Where this occurs, Boxfusion will take reasonable steps to ensure that appropriate safeguards are in place, which may include contractual protections, data processing terms, access controls, confidentiality obligations, security safeguards and client approval where required.

## **13. Security Measures**

Boxfusion applies technical and organisational safeguards to protect personal information against loss, unauthorised access, misuse, unlawful disclosure, alteration or destruction. These safeguards may include:

- role-based access control and least-privilege access;
- multi-factor authentication where applicable;
- secure passwords and privileged access controls;
- restricted SharePoint, OneDrive, HR, finance, project and support folders;
- encryption in transit and at rest where applicable;
- audit logs, monitoring and access reviews;
- secure development, testing and release controls;
- separation of development, test and production environments;
- backups, disaster recovery and incident response processes;
- data minimisation, masking, anonymisation or aggregation where appropriate;
- confidentiality agreements, staff training and disciplinary controls;
- vendor, broker and operator controls where third parties process information.

## **14. Retention of Personal Information**

Boxfusion will retain personal information only for as long as necessary for the purpose for which it was collected or processed, unless a longer retention period is required or permitted by law, contract, client instruction, audit requirement, dispute, investigation or legitimate business need.

When personal information is no longer required, Boxfusion will take reasonable steps to delete, destroy, de-identify, anonymise, archive or restrict it, as appropriate.

## **15. Data Subject Rights**

Data subjects may have rights under POPIA and PAIA, including the right to:

- request confirmation of whether Boxfusion holds personal information about them;

- request access to their personal information;
- request correction or deletion of inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained personal information;
- object to certain processing of personal information;
- withdraw consent where processing is based on consent, subject to legal or contractual limits;
- opt out of direct marketing where applicable;
- submit a complaint to the Information Regulator;
- request access to records under PAIA where the PAIA requirements are met.

Requests should be sent to the privacy or PAIA contact details listed in this Policy. Boxfusion may need to verify identity, authority to act, the record requested, and whether the information belongs to Boxfusion or to a client/government client.

### **16. PAIA Requests and Access to Records**

Requests for access to records under PAIA must be submitted through Boxfusion's PAIA process using the prescribed request form where applicable. Boxfusion will assess each request in accordance with PAIA, POPIA, client obligations, confidentiality requirements, third-party rights and lawful grounds for refusal.

Where a request relates to government client records, citizen information, children's information or records in a client system, Boxfusion may need to consult the relevant client or refer the requester to the correct public body or record owner.

### **17. Security Compromises and Incidents**

If Boxfusion becomes aware of a security compromise involving personal information, Boxfusion will assess the incident and take appropriate steps in accordance with POPIA, applicable contracts, security procedures and regulatory requirements. This may include containment, investigation, remedial action, notification to affected parties, client notification and notification to the Information Regulator where required.

### **18. AI, Analytics and Automated Processing**

Boxfusion may use analytics, automation or AI-assisted tools to support business, operational, product or service activities. Such tools must be used in line with Boxfusion's AI, POPIA, PAIA and information-security requirements. Personal information, client information, citizen information, children's information, source code, credentials, security records or confidential information may not be uploaded into public or unapproved AI tools.

Boxfusion will not use AI as the sole basis for high-impact decisions about employees, candidates, clients, citizens or other persons without appropriate human review and lawful safeguards.

## 19. Links to Third-Party Websites

Boxfusion’s website may include links to third-party websites. Boxfusion is not responsible for the privacy practices, content or security of third-party websites. Users should review the privacy policies of those third parties before submitting personal information to them.

## 20. Updates to this Privacy Policy

Boxfusion may update this Privacy Policy from time to time to reflect changes in law, systems, business activities, services, client requirements or processing activities. The latest version will be published on Boxfusion’s website or made available through appropriate channels.

## 21. Contact and Complaints

Questions, requests or complaints relating to this Privacy Policy or the processing of personal information may be sent to:

Contact type	Details
Privacy / POPIA queries	<a href="mailto:Privacy@boxfusion.io">Privacy@boxfusion.io</a>
PAIA requests	<a href="mailto:Privacy@boxfusion.io">Privacy@boxfusion.io</a>
Information Officer	Xolile Ndlangana - CEO
Deputy Information Officer	Elizma Els - COO
Physical address	International Business Gateway, New Rd, Midridge Park, Midrand, 1685

If a person is dissatisfied with how Boxfusion handles their personal information or access-to-information request, they may also contact the Information Regulator through its official channels.

## 22. Approval

Role	Name	Signature	Date
Information Officer / CEO	Xolile Ndalangana		
COO / Compliance Owner	Elizma Els		
IT / Security Reviewer	John-Etienne van Eeden		