

This Privacy Statement applies to all individuals interacting with Thorburn Security Solutions, including website visitors, clients, suppliers, contractors, and other business partners. It explains how Thorburn collects, uses, stores, shares, and protects Personal Information (PI) in compliance with the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA).

## **1. Collection of Personal Information**

Thorburn collects PI directly from you and, where lawful and reasonable, from third parties or publicly available sources. This includes but is not limited to:

- Names, contact details, ID/passport numbers, financial information
- Browsing behaviour (via cookies), device identifiers, IP addresses
- Employment or contractual details, depending on your interaction with us

## **2. Use of Cookies and Online Tracking**

Our websites may use cookies and similar technologies to improve user experience, analyse traffic, and personalise content. Cookies help us remember your preferences and understand how our websites are used.

You may manage your cookie preferences when visiting our website or via your browser settings. Declining cookies will not deny access to the site, but may affect functionality.

## **3. Lawful Basis for Processing**

Thorburn processes PI based on at least one of the following legal grounds:

- Your consent
- Performance of a contract
- Legal or regulatory obligations
- Legitimate interests pursued by Thorburn or a third party
- As otherwise permitted under applicable law

## **4. Purpose for Processing**

We process PI for:

- Contracting with clients and suppliers
  - Delivering services and conducting transactions
  - Billing and payment administration
  - Managing employment and recruitment
  - Ensuring compliance with legal obligations
  - Security and access control
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- Internal audits, reporting, and training

- Marketing (with consent)

## **5. Disclosure of Personal Information**

We may disclose your PI to:

- Trusted third-party service providers
- Regulators, auditors, legal authorities
- Contractual partners and subsidiaries

All disclosures are subject to strict confidentiality and lawful processing agreements. Cross-border transfers are safeguarded under Section 72 of POPIA.

## **6. Security Safeguards**

We implement appropriate technical and organisational measures to protect PI against loss, theft, and unauthorised access, including:

- Information Security & Cyber Security Policies
- Access controls, encryption, and incident response procedures
- Ongoing employee POPIA training

## **7. Retention of Personal Information**

Thorburn retains personal information only as long as necessary for its purpose or as required by:

- Law or regulation
- Contractual obligations
- Thorburn's Records Retention Policy

Information no longer required is securely destroyed or anonymised.

## **8. Direct Marketing**

We may send you marketing communications if:

- You have provided consent, or
- You are an existing client, and it relates to similar products or services

You may opt out of marketing at any time using the unsubscribe link or by contacting us.

## **9. Your Rights Under POPIA and PAIA**

You have the right to:

- Access your personal information held by Thorburn
- Submit a request for access using PAIA Form 2, in compliance with Regulation 7.1 of the 2021 PAIA Regulations
- Request correction, deletion, or destruction of inaccurate or unnecessary data
- Object to processing or withdraw consent
- Request details of third parties with whom your data has been shared

### **Access to Information (PAIA Compliance Statement)**

To request access to any records held by Thorburn in terms of PAIA:

- Use PAIA Form 2, available on our website
- Submit the completed form to our Information Officer listed below
- View Thorburn's PAIA Manual for a full description of available records and procedures

Thorburn will process all access requests in accordance with applicable legislation and within the statutory timeframes.

## **10. Contact Information**

### **Personal Information Officer:**

Email: [popi@tsebo.com](mailto:popi@tsebo.com)

Tel: 011 441 5300

Address: Thorburn Security Solutions, Tsebo Office Park, 85 Protea Road, Chislehurst, Johannesburg

## **11. Lodging a Complaint**

If you believe your data rights have been violated, you may contact:

### **Information Regulator (South Africa)**

Woodmead North Office Park, 54 Maxwell Drive, Johannesburg

Email: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

Tel: 010 023 5200