

BOA TECHNOLOGIES (PTY) LTD

EXTERNAL PRIVACY POLICY / PRIVACY NOTICE

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BOATECH (PTY) LTD

EXTERNAL PRIVACY POLICY / PRIVACY NOTICE

Effective Date: 18 June 2026

Version: 1.0

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1. INTRODUCTION

BOATECH (Pty) Ltd (“BOATECH”, “we”, “us” or “our”) respects the privacy and confidentiality of personal information entrusted to us by our clients, prospective clients, suppliers, business partners, website visitors, service providers and other individuals whose personal information we process.

BOATECH is an information technology consulting and services firm established in 2006, providing bespoke technology services and solutions to corporate and public-sector organisations across Southern Africa and beyond. Our services include information technology consulting, cybersecurity, automation, data security, application security, hybrid cloud and artificial intelligence (“AI”) solutions, and disaster recovery services.

This Privacy Policy explains how BOATECH collects, uses, stores, protects, shares and otherwise processes personal information in accordance with applicable South African data protection legislation, including the **Protection of Personal Information Act 4 of 2013 (“POPIA”)**.

2. ABOUT BOATECH

BOATECH provides information technology consulting, technology solutions and related professional services to clients and business partners.

In providing these services, BOATECH may process personal information relating to individuals who interact with us, as well as personal information provided to us by clients in connection with services we perform on their behalf.

Where BOATECH processes personal information on behalf of a client or another responsible party, BOATECH will process such information in accordance with the applicable contractual arrangements, lawful instructions and applicable data protection legislation.

3. PURPOSE OF THIS PRIVACY POLICY

The purpose of this Privacy Policy is to explain:

- what personal information BOATECH may collect;
- how and from whom we collect personal information;
- why we process personal information;
- the lawful bases on which we process personal information;
- how personal information is used and disclosed;
- the measures we implement to protect personal information;
- how long personal information may be retained;
- the rights available to data subjects; and
- how individuals may contact BOATECH regarding their personal information or raise a privacy concern.

This Privacy Policy complements BOATECH's internal privacy, confidentiality, information-security and data-protection policies and procedures.

4. WHO THIS PRIVACY POLICY APPLIES TO

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

- existing and prospective clients;
- representatives, employees and authorised users of clients;
- suppliers and prospective suppliers;
- service providers and contractors;
- business partners;
- professional advisers;
- individuals who communicate with BOATECH;
- website visitors and users of our online platforms, where applicable;
- individuals who request information, quotations or services from BOATECH; and
- other individuals whose personal information BOATECH processes in the course of conducting its business.

Where BOATECH processes personal information on behalf of a client or another responsible party, the client or responsible party may remain responsible for determining the purposes and means of processing. In such circumstances, the processing will also be governed by the applicable contractual arrangements and lawful instructions.

5. WHAT IS PERSONAL INFORMATION?

For purposes of this Privacy Policy, “personal information” has the meaning given to it under POPIA and generally refers to information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person.

Depending on the nature of our relationship with you and the services being provided, the personal information we process may include:

- names and surnames;
- identification or passport information;
- contact details, including telephone numbers, email addresses and physical addresses;
- company and professional information;
- job title and business contact information;
- information contained in correspondence with BOATECH;
- information relating to requests, quotations, contracts and services;
- billing and payment-related information;
- information required for compliance with legal or regulatory obligations;
- technical information relevant to the provision, operation or security of our services; and
- other information that identifies or relates to an individual.

The categories of personal information processed will depend on the nature and purpose of the relationship or service concerned.

6. INFORMATION WE COLLECT

Depending on the circumstances, BOATECH may process the following categories of personal information:

6.1 Identification Information

This may include names, surnames, identification numbers, passport details and other information necessary to identify an individual.

6.2 Contact Information

This may include telephone numbers, email addresses, physical addresses, postal addresses and business contact details.

6.3 Business and Professional Information

This may include employer details, job title, professional information, business affiliations and information necessary to establish or manage a business relationship.

6.4 Information Provided When Requesting Services

This may include information contained in requests for information, quotations, proposals, contracts, support requests, project documentation and other communications.

6.5 Financial and Transaction Information

Where necessary, we may process billing, invoicing, payment and other transaction-related information.

6.6 Website and Online Information

Where applicable, BOATECH may process information provided through our website, online platforms, contact forms and other electronic communication channels.

6.7 Technical and Device Information

Where applicable and necessary, we may process technical information relating to devices, systems, networks or services in connection with the provision, operation, maintenance or security of our technology services.

6.8 Supplier, Partner and Service Provider Information

We may process personal information relating to representatives and employees of suppliers, business partners, contractors and service providers where necessary to manage our business relationships.

7. HOW WE COLLECT PERSONAL INFORMATION

BOATECH may collect personal information directly from you or from other lawful sources.

We may collect personal information when you:

- contact us by telephone, email or other communication channels;
- request information about our products or services;
- request a quotation or proposal;
- enter into an agreement with us;
- provide goods or services to BOATECH;
- communicate with our employees or representatives;

- visit or interact with our website or online platforms, where applicable;
- participate in business engagements, meetings or events; or
- provide information in connection with an existing business relationship.

Where lawful and appropriate, we may also receive personal information from organisations or individuals acting on your behalf, publicly available sources, or other third parties where there is a lawful basis for doing so.

8. WHY WE PROCESS PERSONAL INFORMATION

BOATECH may process personal information for the following purposes:

8.1 Provision of Services

To provide, manage, maintain, support and improve our IT consulting, technology, cybersecurity and related services.

8.2 Client and Business Relationship Management

To communicate with clients, prospective clients, suppliers, service providers and business partners and to establish and manage business relationships.

8.3 Contractual Obligations

To enter into, perform and manage agreements with clients, suppliers, service providers and other relevant parties.

8.4 Business Operations

To administer and operate our business, including financial administration, invoicing, procurement, project management and internal administration.

8.5 Security

To protect our systems, networks, information and services against unauthorised access, security threats, misuse, fraud and other risks.

This includes activities associated with BOATECH's technology and cybersecurity services, such as security governance, vulnerability assessment, security-risk assessment, encryption, data security, application security, security monitoring, intrusion detection and prevention, and privileged-access management.

8.6 Legal and Regulatory Compliance

To comply with applicable legislation, regulatory requirements, court orders, lawful requests and other legal obligations.

8.7 Risk Management

To identify, assess and manage operational, contractual, financial, information-security and other business risks.

8.8 Business Development and Communication

Where permitted by applicable law, to communicate with existing and prospective clients regarding BOATECH's services, solutions and business activities.

9. LAWFUL BASIS FOR PROCESSING

BOATECH will process personal information in accordance with POPIA and other applicable data protection laws.

We will process personal information:

- in a lawful and reasonable manner that does not unnecessarily infringe the privacy of the data subject;
- for specific, explicitly defined and lawful purposes related to a function or activity of BOATECH;
- in a manner that is compatible with the purpose for which the information was collected;
- only to the extent that the information is adequate, relevant and not excessive in relation to the purpose for which it is processed; and
- in accordance with applicable requirements relating to the further processing of personal information.

Depending on the circumstances, BOATECH may process personal information were, among other lawful grounds:

- the data subject has consented to the processing;
- processing is necessary to perform a contract to which the data subject is a party or to take steps at the request of the data subject 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 to protect the legitimate interests of BOATECH or a third party, subject to applicable legal requirements; or
- processing is necessary for the proper performance of a public-law duty by a public body.

Where consent is relied upon as the lawful basis for processing, BOATECH will obtain and manage such consent in accordance with applicable law.

The withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

10. ACCURACY OF PERSONAL INFORMATION

BOATECH will take reasonably practicable steps to ensure that personal information in our possession or under our control is complete, accurate, not misleading and updated where necessary.

If you become aware that personal information, we hold about you is incorrect, incomplete or outdated, you may request that we correct or update it.

11. USE OF PERSONAL INFORMATION

BOATECH will use personal information only for the purposes for which it was collected or for purposes otherwise permitted by applicable law.

We will take reasonable steps to ensure that personal information is not used in a manner incompatible with the purpose for which it was collected.

12. SHARING AND DISCLOSURE OF PERSONAL INFORMATION

BOATECH may disclose personal information to third parties where such disclosure is lawful and reasonably necessary for the purposes described in this Privacy Policy.

Such third parties may include:

- service providers;
- technology and cloud-service providers;
- professional advisers;

- auditors;
- contractors;
- business partners;
- insurers and financial institutions, where applicable;
- regulatory and government authorities;
- law-enforcement authorities where legally required; and
- other parties where disclosure is required or permitted by law.

Where appropriate, BOATECH will take reasonable steps to ensure that third parties receiving personal information are subject to suitable confidentiality, privacy and security obligations.

13. SERVICE PROVIDERS, PARTNERS AND OPERATORS

BOATECH works with strategic ICT services businesses, original equipment manufacturers (“OEMs”), distributors, technology providers and system-integration partners.

Where a third-party processes personal information on behalf of BOATECH, BOATECH will take reasonable steps to ensure that the third party:

- processes the information only in accordance with authorised instructions;
- maintains appropriate confidentiality;
- implements appropriate security safeguards; and
- complies with applicable contractual and legal requirements.

Where required by POPIA, BOATECH will enter into appropriate written agreements with operators or other third parties that process personal information on its behalf.

14. INFORMATION SECURITY

BOATECH takes reasonable technical and organisational measures to protect personal information against:

- loss;
- theft;
- unauthorised access;
- unauthorised disclosure;
- destruction;
- damage;
- alteration;

- misuse; and
- other unlawful or unauthorised forms of processing.

Security measures may include, where appropriate:

- access controls and authentication;
- multi-factor authentication;
- encryption;
- network and endpoint security;
- vulnerability management;
- security monitoring;
- intrusion detection and prevention;
- privileged-access management;
- backup and recovery controls;
- confidentiality obligations; and
- security awareness and other organisational measures.

BOATECH regularly reviews its security measures and may update them in response to technological developments, identified risks, security incidents and changes in applicable requirements.

However, no information-security system can guarantee absolute security.

15. CYBERSECURITY AND DATA PROTECTION

As an information technology and cybersecurity services provider, BOATECH recognises the importance of protecting information against evolving cybersecurity threats.

Our technology and cybersecurity activities may include security governance, risk assessments, encryption, data security, multi-factor authentication, application security, security monitoring, intrusion detection and prevention, privileged-access management and related security controls.

Where BOATECH processes personal information as part of providing these services, such processing will be undertaken in accordance with applicable contractual requirements, lawful instructions and applicable data protection legislation.

16. CLOUD, AI AND TECHNOLOGY SERVICES

BOATECH provides hybrid-cloud and AI-related solutions and may combine public-cloud services, private-cloud infrastructure and on-premises workloads.

Where personal information is processed through cloud, hosting, AI or other technology platforms, BOATECH will take reasonably practicable steps to ensure that appropriate privacy, security and contractual safeguards are in place.

Where third-party technology providers process personal information on behalf of BOATECH, appropriate contractual and security requirements will be applied where required by law.

17. CROSS-BORDER TRANSFERS

Where BOATECH transfers personal information outside the Republic of South Africa, the transfer will be undertaken in accordance with applicable requirements under POPIA.

Depending on the circumstances, BOATECH may rely on appropriate safeguards or another lawful basis recognised under applicable law, including circumstances where the recipient provides an adequate level of protection or where another ground permitted under POPIA applies.

Where appropriate, BOATECH may implement contractual, technical or organisational safeguards to protect personal information transferred internationally.

18. RETENTION OF PERSONAL INFORMATION

BOATECH will not retain personal information for longer than is necessary to fulfil the purpose for which it was collected or processed, unless a longer retention period is required or permitted by law.

The applicable retention period may depend on:

- the nature and sensitivity of the information;
- the purpose for which it was collected;
- contractual requirements;
- legal and regulatory obligations;
- dispute-resolution requirements;
- legitimate business requirements; and

- information-security considerations.

When personal information is no longer required, BOATECH will take reasonably practicable steps to securely delete, destroy or de-identify the information, where appropriate.

19. DATA SUBJECT RIGHTS

Subject to applicable legal limitations and requirements, data subjects may have rights under POPIA, including the right to:

- request access to personal information held by BOATECH;
- request correction or updating of inaccurate or incomplete personal information;
- request deletion or destruction of personal information where permitted by law;
- object to the processing of personal information in circumstances provided for by law;
- object to the processing of personal information for direct marketing by unsolicited electronic communications;
- withdraw consent where processing is based on consent;
- request information regarding the processing of their personal information; and
- lodge a complaint regarding the processing of their personal information.

Requests relating to personal information should be submitted using the contact details in section 25 of this Privacy Policy.

BOATECH may be required to verify the identity of the person making a request and may lawfully refuse or limit a request where an applicable legal exception or limitation applies.

20. DIRECT MARKETING

BOATECH may engage in direct marketing in accordance with applicable law.

Where consent is required by law, BOATECH will obtain such consent before sending direct marketing communications.

Where applicable, individuals will be provided with an appropriate opportunity to object to or unsubscribe from direct marketing communications.

BOATECH will respect applicable requests to stop receiving direct marketing communications.

21. COOKIES AND WEBSITE TECHNOLOGIES

Where BOATECH's website or online platforms use cookies or similar technologies, these technologies may be used for purposes such as:

- enabling essential website functionality;
- improving website performance;
- understanding website usage;
- maintaining security; and
- supporting other legitimate website-related functions.

Where applicable, BOATECH will provide additional information regarding the cookies and similar technologies used on its website and how users may manage their preferences.

22. DATA BREACHES AND SECURITY COMPROMISES

BOATECH maintains processes for identifying, managing, investigating and responding to information-security incidents and personal-information security compromises.

Any suspected or confirmed security compromise involving personal information will be assessed and managed in accordance with BOATECH's internal security and privacy procedures and applicable law.

Where a security compromise meets the applicable legal requirements for notification, BOATECH will notify the Information Regulator and affected data subjects as required by POPIA.

BOATECH will take reasonably practicable steps to contain, investigate and remediate security compromises and to reduce the risk of recurrence.

23. CHILDREN'S PERSONAL INFORMATION

BOATECH does not intentionally seek to collect personal information from children unless such processing is permitted by law and appropriate safeguards are in place.

Where children's personal information is processed as part of a client engagement, BOATECH will apply appropriate contractual, technical and organisational safeguards and will process such information in accordance with applicable law.

24. SPECIAL PERSONAL INFORMATION

Certain categories of personal information receive additional protection under POPIA.

BOATECH will process special personal information only where permitted by applicable law and where an appropriate lawful basis and applicable safeguards exist.

Where BOATECH processes special personal information on behalf of a client as part of an IT or technology service, BOATECH will process such information in accordance with the client's lawful instructions, the applicable contractual arrangements and applicable legal requirements.

25. AUTOMATED DECISION-MAKING AND PROFILING

Where BOATECH undertakes processing involving automated decision-making or profiling that is subject to specific requirements under POPIA, BOATECH will take appropriate steps to ensure compliance with the applicable legal requirements.

Where applicable, BOATECH will provide data subjects with information concerning such processing and any rights available to them under applicable law.

26. CONFIDENTIALITY

BOATECH recognises the importance of maintaining the confidentiality of information entrusted to us.

Employees, contractors and relevant third parties who have access to personal information are required to comply with applicable BOATECH privacy, confidentiality, information-security and data-protection requirements.

Access to personal information will be limited to persons who require such access for legitimate business, contractual, operational or legal purposes.

27. COMPLAINTS AND THE INFORMATION REGULATOR

If you believe that BOATECH has processed your personal information unlawfully or has not adequately addressed your privacy concerns, you are encouraged to contact BOATECH using the details provided in this Privacy Policy so that we can investigate and address your concern.

You may also lodge a complaint with the **Information Regulator of South Africa**, which is responsible for monitoring and enforcing compliance with POPIA and other applicable legislation.

Information Regulator of South Africa

Telephone: 010 023 5200

Email: enquiries@inforegulator.org.za

Complaints and other regulatory submissions may also be made through the Information Regulator's applicable electronic services.

28. CHANGES TO THIS PRIVACY POLICY

BOATECH may amend or update this Privacy Policy from time to time to reflect:

- changes in legislation or regulatory requirements;
- changes to our services or business activities;
- changes to our information-processing practices;
- technological developments;
- changes to third-party services or technology platforms; or
- improvements to our privacy, security and data-protection practices.

The latest version of this Privacy Policy will be made available through the appropriate BOATECH communication channels or website.

The effective date and version number will be updated when material amendments are made.

29. CONTACT DETAILS

For privacy-related queries, requests or concerns, please contact:

BOATECH (Pty) Ltd

Unit 12, 44 Richards Drive
Innovation Worx Office Park
1685
South Africa

Telephone: 011 568 4472

Email: info@boatech.co.za

Website: www.boatech.co.za

Management confirmation required:

Boas Chauke - boasc@boatech.co.za (083 6468 375)

Rudzani Midzi - rudzanim@boatech.co.za (079 5578 244)

Information Officer / Privacy Contact

Where applicable, privacy requests may also be directed to BOATECH's designated Information Officer using the contact details provided above.

30. APPROVAL AND REVIEW

Approved By: Boas Chauke

Effective Date: 18 June 2026

Review Date: 18 June 2027

Version: 1.0

This Privacy Policy will be reviewed periodically and, where appropriate, updated to ensure that it remains relevant to BOATECH's business activities and aligned with applicable legal, regulatory, privacy and information-security requirements.
