



PRIVACY POLICY

DOCUMENT CONTROL

DOCUMENT TITLE:	Privacy Policy
DOCUMENT NUMBER:	GTICS-PRIV-POL-001
VERSION NUMBER:	1
REVIEW DATE:	30/01/2026
NEXT REVIEW	30/01/2031
PREPARED BY:	GTICS

VERSION HISTORY

VERSION	DATE	AUTHOR	APPROVED BY	BRIEF DESCRIPTION OF CHANGES
1	30/01/2026	GTICS	Chief Executive Officer	First Version

CONTENTS

1. PURPOSE	3
2. SCOPE.....	3
3. USERS.....	3
4. LEGAL BASIS.....	3
5. DEFINITIONS	4
6. GENERAL PRINCIPLES FOR PROCESSING PERSONAL INFORMATION.....	4
7. DATA SUBJECT RIGHTS.....	5
8. OPENESS & NOTIFICATION.....	5
9. DATA PROCESSING	5
10. PROCESSING OF SPECIAL INFORMATION	6
11. CHILDRENS PERSONAL INFORMATION	6
12. DIRECT MARKETING	7
13. DATA SECURITY	7
14. DATA SECURITY	7
15. COMPLIANCE AND MONITORING	8
16. THIRD PARTY RELATIONSHIPS	8
17. DATA PRIVACY TRAINING AND AWARENESS	8
18. DATA PRIVACY TRAINING AND AWARENESS	8
19. INTERNATIONAL DATA TRANSFERS.....	9
20. INTERNATIONAL DATA TRANSFERS.....	9

1. PURPOSE

This Policy governs the processing of personal information by GTICS Global Training Testing Inspection and Certification Services (“GTICS”) and outlines the responsibilities, principles, and procedures for ensuring that personal information is processed in a lawful, transparent, and secure manner. GTICS is committed to protecting the privacy of all individuals whose personal information it processes, including employees, prospective employees, clients, prospective clients, certified clients, auditors, technical experts, subcontractors, website users, suppliers, contractors, complainants, appellants, and any other individuals whose personal information is processed by GTICS.

2. SCOPE

This Policy applies to all GTICS functions, activities, systems, and persons involved in the processing of personal information, including but not limited to:

- certification activities;
- audit planning and delivery;
- application, contract review, and client administration;
- complaints and appeals handling;
- technical review and certification decision-making;
- finance, procurement, human resources, and marketing activities;
- IT systems, websites, and digital platforms; and
- all outsourced or externally provided activities where personal information is processed on behalf of GTICS.

3. USERS

All GTICS employees, directors, committee members, auditors, technical experts, subcontractors, service providers, and any other persons acting on behalf of GTICS who have access to personal information must comply with this Policy.

4. LEGAL BASIS

GTICS is committed to complying with the Protection of Personal Information Act, 4 of 2013 (POPIA) and any other applicable data protection or privacy laws in South Africa.

This Policy is guided by the eight conditions for lawful processing in Chapter 3 of POPIA, namely:

- accountability;
- processing limitation;
- purpose specification;
- further processing limitation;
- information quality;
- openness;
- security safeguards; and
- data subject participation.

5. DEFINITIONS

The following definitions may apply:

DESCRIPTION	DEFINITION
Data Subject	An identifiable, living natural person, and where applicable, an identifiable existing juristic person, whose personal information is processed.
Personal Information	Information relating to an identifiable, living natural person, and where applicable, an identifiable existing juristic person. This includes any information that can directly or indirectly identify the data subject.
Processing	Any operation or activity concerning personal information, whether or not by automatic means, including collection, receipt, recording, organisation, storage, updating, retrieval, use, dissemination, distribution, transfer, merging, restriction, degradation, erasure, or destruction.
Responsible Party	The public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.
Operator	A person or entity that processes personal information for GTICS in terms of a contract or mandate, without coming under the direct authority of GTICS.
Special Personal Information	Information relating to a data subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour, which is subject to additional protection under POPIA.
Information Officer	The person designated by GTICS to oversee compliance with POPIA and this Policy.

6. GENERAL PRINCIPLES FOR PROCESSING PERSONAL INFORMATION

GTICS shall ensure that all personal information is processed in accordance with the following principles:

- **Lawfulness, Fairness, and Transparency**
Personal information shall be processed lawfully and in a manner that is fair and transparent to the data subject.
- **Purpose Limitation**
Personal information shall be collected for specific, explicitly defined, and lawful purposes related to GTICS operations and certification activities.
- **Data Minimisation**
Personal information collected shall be adequate, relevant, and not excessive in relation to the purpose for which it is processed.
- **Accuracy**
GTICS shall take reasonably practicable steps to ensure that personal information is complete, accurate, not misleading, and kept up to date where necessary.
- **Storage Limitation**

Personal information shall not be retained for longer than necessary to achieve the purpose for which it was collected, unless retention is required by law, contract, accreditation requirements, scheme rules, or legitimate operational needs.

- Integrity and Confidentiality
Appropriate technical and organisational measures shall be implemented to protect personal information against accidental loss, damage, unauthorised access, unlawful disclosure, or unlawful processing.
- Accountability
GTICS shall ensure compliance with POPIA and shall be able to demonstrate such compliance where required.

7. DATA SUBJECT RIGHTS

GTICS respects the rights of data subjects under POPIA, including the right to:

- request access to personal information held about them;
- request correction, updating, or deletion of inaccurate, irrelevant, excessive, outdated, incomplete, misleading, or unlawfully obtained information;
- object to the processing of personal information in certain circumstances;
- withdraw consent at any time where processing is based on consent;
- submit a complaint to GTICS or to the Information Regulator;
- request that processing be restricted where appropriate and lawful; and
- be informed where personal information has been accessed or acquired by an unauthorised person, where notification is required by law.

8. OPENESS & NOTIFICATION

When collecting personal information, GTICS shall, where required by POPIA, notify the data subject of:

- the name and contact details of GTICS as the Responsible Party;
- the purpose for which the personal information is collected;
- whether the supply of the information is voluntary or mandatory;
- the consequences of failure to provide the information;
- the law authorising or requiring the collection, where applicable;
- any recipients or categories of recipients of the information;
- the data subject's rights under POPIA;
- whether GTICS intends to transfer the information outside South Africa; and
- the safeguards applicable to such transfer, where relevant.

9. DATA PROCESSING

GTICS shall only process personal information where there is a lawful basis to do so, including:

- the consent of the data subject;

- the conclusion or performance of a contract;
- compliance with a legal obligation;
- protection of a legitimate interest of the data subject;
- performance of a public law duty;
- pursuit of the legitimate interests of GTICS or of a third party, where such interests are not overridden by the rights of the data subject.

GTICS may process personal information in the ordinary course of its activities, including for:

- client applications and contract review;
- audit planning, delivery, and reporting;
- competence management and authorisation of personnel;
- complaints, appeals, and dispute resolution;
- issuance, maintenance, suspension, withdrawal, or restoration of certification;
- statutory, regulatory, accreditation, and scheme-related obligations;
- supplier, contractor, and operator management;
- human resources and payroll administration;
- finance, invoicing, and debt recovery;
- security, access control, and IT administration; and
- marketing and business development, where lawful.

10. PROCESSING OF SPECIAL INFORMATION

GTICS recognises that certain categories of information may constitute special personal information under POPIA. Such information shall only be processed:

- with the explicit consent of the data subject, where required;
- where necessary for the establishment, exercise, or defence of a right or obligation in law;
- where authorised or required by legislation;
- where necessary for employment obligations, health and safety obligations, or legal compliance, to the extent permitted by law; or
- for historical, statistical, or research purposes, subject to appropriate safeguards.

GTICS shall implement appropriate technical, organisational, and contractual measures to protect such information from unauthorised access, disclosure, misuse, loss, or damage.

11. CHILDRENS PERSONAL INFORMATION

GTICS will not process the personal information of children unless such processing is lawful and permitted under POPIA, including where consent is obtained from a competent person or where otherwise authorised by law.

12. DIRECT MARKETING

GTICS will not conduct direct marketing by electronic communications in contravention of POPIA. Where consent is required, it shall be obtained before such communications are sent. Existing customers may receive direct marketing only where permitted by law and where they have been given a reasonable opportunity to opt out. All marketing communications shall contain a clear opt-out mechanism.

13. DATA SECURITY

GTICS shall implement and maintain appropriate, reasonable technical and organisational security measures to safeguard personal information, taking into account:

- the nature of the information;
- the harm that could result from a security breach;
- the technology reasonably available; and
- the cost of implementing safeguards.

Such measures may include:

- access controls and user permissions;
- password protection and multi-factor authentication where appropriate;
- encryption and secure storage;
- anti-virus, firewall, and endpoint protection measures;
- secure disposal and destruction methods;
- confidentiality undertakings;
- secure transfer protocols; and
- ongoing monitoring and review of information security controls.

In the event of a personal information security compromise, GTICS shall assess the incident and notify the Information Regulator and affected data subjects as soon as reasonably possible where required by Section 22 of POPIA.

14. DATA RETENTION

GTICS shall retain personal information only for as long as necessary to fulfil the purpose for which it was collected, unless a longer retention period is required or permitted by:

- applicable law;
- contractual commitments;
- accreditation requirements;
- certification scheme requirements;
- dispute, complaint, appeal, or litigation needs; or
- legitimate operational, governance, or evidentiary purposes.

Once personal information is no longer required, it shall be securely destroyed, deleted, or anonymised in a manner that prevents reconstruction or unauthorised recovery.

15. COMPLIANCE AND MONITORING

The Information Officer is responsible for overseeing compliance with this Policy and POPIA, including:

- monitoring implementation;
- conducting or coordinating compliance reviews;
- supporting awareness and training;
- handling privacy-related requests and complaints;
- maintaining appropriate records; and
- supporting breach response and corrective action.

All employees, contractors, auditors, technical experts, committee members, and service providers must report any suspected breach, non-compliance, or privacy concern immediately through the appropriate GTICS reporting channels.

16. THIRD PARTY RELATIONSHIPS

Where personal information is shared with operators, external service providers, subcontracted auditors, technical experts, IT providers, cloud service providers, or other third parties, GTICS shall ensure that appropriate contractual controls are in place requiring such parties to:

- process personal information only on documented instruction;
- implement appropriate security safeguards;
- maintain confidentiality;
- use the information only for authorised purposes; and
- comply with POPIA and any applicable GTICS requirements.

GTICS may disclose personal information where required for legitimate certification and business purposes, including to accreditation bodies, scheme owners, regulators, legal advisers, insurers, and other authorised parties, provided such disclosure is lawful and appropriately controlled.

17. DATA PRIVACY TRAINING AND AWARENESS

GTICS shall provide appropriate privacy, confidentiality, and information protection training and awareness to relevant personnel on a regular basis. This shall include awareness of:

- POPIA obligations;
- secure handling of personal information;
- confidentiality obligations;
- breach reporting; and
- role-specific privacy risks and controls.

18. DATA PRIVACY TRAINING AND AWARENESS

Before implementing new projects, systems, technologies, services, or processing activities that may materially affect privacy or involve significant processing of personal information, GTICS shall consider whether a Privacy Impact Assessment or similar risk assessment is required.

Where appropriate, such assessment shall identify:

- the purpose and scope of processing;
- privacy risks;

- affected data subjects;
- safeguards required; and
- actions needed before implementation.

19. INTERNATIONAL DATA TRANSFERS

GTICS shall only transfer personal information outside South Africa where such transfer is lawful under Section 72 of POPIA, including where:

- the recipient is subject to laws, binding rules, or agreements that provide an adequate level of protection;
- the data subject consents to the transfer;
- the transfer is necessary for performance of a contract;
- the transfer benefits the data subject; or
- the transfer is otherwise permitted by law.

Where cross-border transfers occur, GTICS shall take reasonable steps to ensure that appropriate safeguards are implemented.

20. INTERNATIONAL DATA TRANSFERS

Any complaint, concern, or request relating to the processing of personal information may be submitted to the GTICS Information Officer:

Information Officer: M Rassulmia

Email: m.mia@gtics.co.za

Phone: [012 030 3436](tel:0120303436)

Address: Building 14, Block B, Corner of Olievenhoutboch &, Byls Bridge Office Park, Jean Ave, Centurion, 0157

If the matter is not resolved internally, the data subject may escalate the complaint to the Information Regulator:

Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: PAIAComplaints@inforegulator.org.za

POPIAComplaints@inforegulator.org.za

Website: www.inforegulator.org.za