

ARC90 ACCOUNTING & ADVISORY – PRIVACY POLICY (POPIA)

1. Introduction

Respecting and protecting your privacy and Personal Information is a constitutional right and a core business priority for Arc90 Accounting & Advisory ("Arc90", "we", "us", or "our") . This policy governs how we collect, process, store, and disclose your personal information in accordance with the Protection of Personal Information Act, No. 4 of 2013 (POPIA).

By signing our engagement letter, transacting with us, or using our website, you accept the practices described in this policy.

2. Why We Process Personal Information

As an accounting and advisory firm, we routinely handle financial and personal data. We only collect and process information that is necessary to fulfill our mandate to you and to comply with South African law. This includes:

- Providing professional bookkeeping, accounting, tax, and advisory services.
- Complying with statutory and regulatory obligations, including the Financial Intelligence Centre Act (FICA) of 2002, Anti-Money Laundering legislation, and South African Revenue Service (SARS) requirements.
- Issuing invoices, managing account queries, and executing client instructions.
- Conducting conflict-of-interest and background checks.
- Managing recruitment and employment processes for our team.

3. Categories of Personal Information Collected

Depending on your relationship with Arc90, we may collect and process the following information:

- **Identity Information:** Full names, ID/passport numbers, company registration numbers, and signatures.
- **Contact Information:** Physical addresses, email addresses, and phone numbers.
- **Financial Information:** Bank statements, financial records, tax numbers, salary details, and invoices.
- **Employment & Education Records:** For employees, contractors, or job applicants.

4. How We Collect Your Information

We collect personal information through the following channels:

- **Directly from you:** During meetings, over phone calls, via onboarding forms, or through email communications.
- **Third parties:** Where authorized, we may obtain information from public platforms, companies records offices (CIPC), credit bureaus, background-check providers, or your designated representatives.

5. Security and Storage of Data

We take all reasonable and appropriate technical and organizational measures to safeguard your personal information against unauthorized access, loss, or destruction.

- Your information may be stored securely in physical archives or electronically on cloud-based servers.
- We retain your personal information only for as long as necessary to fulfill its primary purpose, maintain our business relationship, or satisfy legal and statutory record-keeping periods.

6. Sharing and Disclosure of Information

We do not sell your data. We will only share your personal information under the following strict conditions:

- With Arc90 employees and consultants who require access to manage your portfolio.
- With trusted third-party service providers (such as cloud accounting software, secure data backup solutions, and IT management platforms) bound by strict confidentiality agreements.
- With regulatory and governmental authorities (such as SARS or law enforcement bodies) where required by applicable law.
- **Cross-Border Transfers:** If your data is stored or processed via international cloud-based infrastructure, we ensure that the host country offers adequate data protection laws or that the provider is bound by binding corporate rules matching POPIA standards.

7. Your Data Subject Rights

In terms of POPIA, you have the right to:

- Request confirmation of whether we hold your personal information and obtain a copy of it (subject to a legally allowable fee).
- Request that we update, correct, or delete inaccurate or misleading information.
- Object to the processing of your personal information for direct marketing purposes.
- Withdraw your consent to process your information at any time (though this may impact our ability to continue providing services to you).

To exercise any of these rights, please contact our Information Officer in writing.

8. Website Cookies

Our website may utilize cookies to monitor user interactions and improve site functionality. You can manage or disable cookies through your browser settings.

9. Contact Details

If you have any questions or wish to exercise your rights under this policy, please contact us directly:

- **Company Name:** Arc90 (Pty) Ltd. ta Arc90 Accounting & Advisory
- **Email Address:** info@arc90.co.za
- **Website:** <https://www.arc90.co.za>

If we cannot resolve your complaint to your satisfaction, you have the right to escalate the matter to the national regulator:

- **The Information Regulator (South Africa)**
- **Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Postal Address:** P.O. Box 31533, Braamfontein, 2017
- **Complaints Email:** complaints.IR@info regulator.org.za

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