

# PRIVACY POLICY

Comprehensive Data Protection & Privacy Notice — POPIA | GDPR | HPCSA

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Owner	Information Officer, Bonela Consulting
Jurisdiction	Republic of South Africa & EU/EEA
Applicable Law	POPIA (Act 4 of 2013), GDPR (EU 2016/679), HPCSA Act 56 of 1974
Review Cycle	Annually or upon material regulatory change

CONFIDENTIAL

## 1. Introduction and Scope

This Privacy Policy (“Policy”) sets out how Bonela Consulting (Pty) Ltd (“Bonela”, “we”, “our”, or “us”), a Level-2 B-BBEE People Solutions company registered in the Republic of South Africa, collects, uses, stores, discloses, and otherwise processes Personal Information and Personal Data in connection with our people development, organisational effectiveness, and psychometric assessment services.

Bonela operates from South Africa and provides services to clients in both South Africa and the European Economic Area (“EEA”). Accordingly, this Policy is drafted to satisfy the requirements of the Protection of Personal Information Act 4 of 2013 (“POPIA”), the General Data Protection Regulation (EU) 2016/679 (“GDPR”), the ePrivacy Directive 2002/58/EC, the Health Professions Act 56 of 1974, and all subsidiary regulations issued by the Health Professions Council of South Africa (“HPCSA”) Professional Board for Psychology.

This Policy applies to:

- Candidates and employees of our client organisations who undergo psychometric assessments, development programmes, or organisational interventions
- Representatives, employees, and contractors of our client organisations
- Visitors to our website at <https://bonelaconsulting.com>
- Our own employees, contractors, and service providers
- Any natural person whose Personal Information or Personal Data we process

## 2. Definitions

In this Policy, unless the context indicates otherwise:

Term	Definition
Assessment Data	All data generated during or as a result of a psychometric assessment, including raw scores, norm-referenced scores, personality profiles, cognitive ability results, job-fit diagnostic outputs, and professional interpretative reports.
Candidate	A natural person who undergoes a psychometric assessment, workshop, or development intervention facilitated by Bonela.
Client	The corporate entity or organisation that engages Bonela to deliver people development, organisational effectiveness, or psychometric assessment services.
Controller / Responsible Party	The natural or juristic person that determines the purpose and means of processing Personal Information (POPIA) or Personal Data (GDPR).
Data Subject	The natural person to whom the Personal Information or Personal Data relates (both POPIA and GDPR).
GDPR	General Data Protection Regulation (EU) 2016/679.
HPCSA	Health Professions Council of South Africa, including its Professional Board for Psychology.
Information Officer	The person designated under POPIA section 55 to be responsible for compliance with POPIA within Bonela.

Term	Definition
Operator / Processor	The natural or juristic person who processes Personal Information on behalf of the Responsible Party (POPIA) or Controller (GDPR).
Personal Data	Any information relating to an identified or identifiable natural person (GDPR definition).
Personal Information	Information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including but not limited to information relating to race, gender, mental health, biometric information, and personal opinions (POPIA definition).
POPIA	Protection of Personal Information Act 4 of 2013 (South Africa).
Processing	Any operation performed on Personal Information/Data, including collection, recording, organisation, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction.
Special Personal Information	As defined in POPIA section 26: religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life, biometric information, or criminal behaviour. Under GDPR (Article 9), "special categories of personal data".

### 3. Identity of the Responsible Party / Controller

For the purposes of POPIA and the GDPR:

<b>Entity Name</b>	Bonela Consulting (Pty) Ltd
<b>Trading As</b>	Bonela Consulting
<b>Registered Address</b>	31 Loerie Crescent, Canyoniqua, Mosselbay, South Africa, 6500
<b>Website</b>	<a href="https://bonelaconsulting.com">https://bonelaconsulting.com</a>
<b>Information Officer</b>	Eugene Viljoen
<b>Deputy Information Officer</b>	Ettiene Viljoen
<b>Email</b>	<a href="mailto:info@bonelaconsulting.com">info@bonelaconsulting.com</a>
<b>Telephone</b>	+27 83 264 6275
<b>POPIA Regulator Reg. No.</b>	2024-040075
<b>EU Representative (Art. 27)</b>	N/A

In most engagements, our Client acts as the Controller/Responsible Party in respect of their employees' or candidates' Personal Information, and Bonela acts as the Operator/Processor. Where Bonela independently determines the purpose and means of processing (for example, for our own marketing or direct assessment engagements), Bonela acts as the Controller/Responsible Party.

### 4. Categories of Personal Information We Process

#### 4.1 Candidate and Employee Data

When delivering psychometric assessments, people development workshops, and organisational effectiveness interventions, we may process the following categories:

##### 4.1.1 Identifying Information

- Full name, surname, preferred name, title
- Identity number, passport number, or employee number
- Date of birth, age, gender
- Nationality, citizenship, language preference
- Photograph (where provided for identification)

##### 4.1.2 Contact Information

- Email address (personal and/or business)
- Telephone number (mobile and/or landline)
- Physical and postal address

##### 4.1.3 Employment Information

- Employer name, department, division, business unit
- Job title, job grade, reporting line
- Employment start date, tenure, employment type
- Work location, team structure

#### **4.1.4 Assessment Data (Special Personal Information / Special Category Data)**

This category includes data that may constitute Special Personal Information under POPIA section 26 or special categories of personal data under GDPR Article 9:

- Cognitive ability assessment scores and profiles
- Personality assessment results (e.g., Big Five, MBTI-equivalent, 16PF)
- Emotional intelligence assessment outputs
- Behavioural and competency assessment results
- Job-fit diagnostic scores and recommendations
- 360-degree feedback data
- Leadership assessment outputs
- Individual development plan data
- Professional interpretative reports prepared by registered psychologists or psychometrists
- Raw item-level response data
- Information relating to mental health, psychological wellbeing, or cognitive functioning that may be inferred from assessment results

#### **4.1.5 Training and Development Data**

- Workshop attendance records and completion certificates
- Pre- and post-assessment scores
- Learning management system activity logs
- Feedback and evaluation form responses

#### **4.1.6 Technical and Usage Data**

- IP address, browser type, operating system
- Device identifiers, screen resolution
- Date, time, and duration of assessment sessions
- Assessment platform interaction logs (e.g., time per item, navigation patterns)

### **4.2 Client Representative Data**

- Name, job title, email, and telephone of client contact persons
- Billing and invoicing information
- Contractual correspondence

### **4.3 Website Visitor Data**

- IP address, cookies, and usage analytics (see Section 16)
- Contact form submissions
- Newsletter subscription data

## 5. Lawful Basis for Processing

### 5.1 Under POPIA (Conditions for Lawful Processing)

We process Personal Information in accordance with one or more of the following conditions set out in POPIA Chapter 3:

POPIA Condition	Application
Section 11 — Consent	Where Candidates provide informed, voluntary, specific consent to undergo psychometric assessments and for processing of their Assessment Data. Consent is obtained via our Candidate Consent Form.
Section 11 — Necessary for a contract	Processing necessary to perform our contractual obligations to Clients for the delivery of assessment, training, and organisational effectiveness services.
Section 11 — Legal obligation	Processing required to comply with HPCSA regulations, B-BBEE reporting obligations, Skills Development Act requirements, Employment Equity Act obligations, and tax legislation.
Section 11 — Legitimate interest	Processing necessary for our legitimate business interests (e.g., service improvement, quality assurance, business development), provided such interest does not override the Data Subject's rights.
Section 27 — Special Personal Information	Assessment Data that constitutes Special Personal Information is processed on the basis of explicit consent (section 27(1)(a)), or because processing is necessary for the establishment, exercise, or defence of a right or obligation in law (section 27(1)(d)).

### 5.2 Under GDPR (Article 6 and Article 9)

For Data Subjects in the EEA, we rely on the following legal bases:

GDPR Legal Basis	Application
Article 6(1)(a) — Consent	Where the Candidate has given clear, informed consent to the processing of their personal data for psychometric assessment purposes.
Article 6(1)(b) — Contract	Processing necessary for the performance of a contract to which the Data Subject is party, or to take pre-contractual steps at the request of the Data Subject.
Article 6(1)(c) — Legal obligation	Processing necessary for compliance with EU or Member State legal obligations to which Bonela is subject.
Article 6(1)(f) — Legitimate interests	Processing necessary for the purposes of Bonela's or a third party's legitimate interests, where such interests are not overridden by the Data Subject's fundamental rights and freedoms. A Legitimate Interest Assessment (LIA) is conducted and documented for each use case.
Article 9(2)(a) — Explicit consent	For special categories of data (including data concerning health, psychological profiling), explicit consent is obtained from the Candidate.

GDPR Legal Basis	Application
Article 9(2)(h) — Occupational medicine/assessment	Processing necessary for the purposes of occupational capacity assessments, in accordance with applicable EU or Member State law.

## 6. Purpose of Processing

We process Personal Information and Personal Data strictly for the following purposes:

1. To administer, score, and interpret psychometric assessments in compliance with HPCSA requirements and international best practice standards.
2. To generate professional assessment reports and provide evidence-based recommendations to Clients for recruitment, selection, development, succession planning, and talent management decisions.
3. To deliver people development workshops, coaching, and training programmes.
4. To conduct organisational effectiveness interventions, including team diagnostics, culture assessments, and change management initiatives.
5. To fulfil contractual obligations to our Clients under service level agreements.
6. To comply with legal and regulatory obligations, including HPCSA professional and ethical standards, Employment Equity Act, Skills Development Act, B-BBEE Act, tax legislation, and any applicable EU/EEA legislation.
7. To conduct research and development for the validation and norming of assessment instruments (only with anonymised or de-identified data, or with explicit consent).
8. To manage client relationships, invoicing, and business administration.
9. To improve and maintain the security, integrity, and performance of our IT systems and assessment platforms.
10. To respond to enquiries, provide support, and communicate service-related information.
11. To conduct quality assurance, professional supervision, and peer review in accordance with HPCSA Scope of Practice regulations.
12. To comply with lawful requests from regulatory authorities, courts, or law enforcement agencies.

## 7. HPCSA Compliance and Professional Standards

As a provider of psychometric assessment services, Bonela is bound by the professional and ethical standards of the HPCSA Professional Board for Psychology. The following principles govern our handling of Assessment Data:

### 7.1 Registered Professionals

All psychometric assessments are administered, scored, and interpreted under the supervision of, or directly by, professionals registered with the HPCSA as either Psychologists or Psychometrists in the appropriate category and scope of practice.

### 7.2 Classified Assessments

Assessment instruments classified by the HPCSA are used strictly in accordance with their classification. Access to classified test materials is restricted to appropriately registered professionals.

### 7.3 Informed Consent

Candidates are provided with clear, comprehensive information about the assessment process, the nature of the assessment, how results will be used, who will have access to results, and their rights before providing consent. Consent is documented via our Candidate Consent Form.

## **7.4 Feedback**

In accordance with HPCSA ethical rules, Candidates are entitled to individual feedback on their assessment results. Feedback is provided by a registered professional in a manner that is understandable and appropriate.

## **7.5 Confidentiality**

Assessment results are treated as confidential professional information. Access is restricted to the registered professional conducting the assessment and authorised Client representatives as specified in the consent form. Raw test data and item-level responses are never disclosed to the Client.

## **7.6 Fair and Unbiased Assessment**

We use assessment instruments that are validated and normed for the relevant South African and international populations. We continuously monitor for potential bias and ensure that assessment practices comply with the Employment Equity Act 55 of 1998 (section 8) requirements for fair and validated psychometric testing.

## **7.7 Record Retention**

Assessment records are retained for a minimum period as required by the HPCSA (typically not less than five years from the date of assessment), after which they are securely destroyed unless a longer retention period is required by law or contract.

## 8. Data Sharing and Disclosure

### 8.1 Categories of Recipients

We may share Personal Information with the following categories of recipients, subject to appropriate contractual and security safeguards:

Recipient Category	Purpose	Safeguards
Client Organisation	Delivery of assessment reports, training reports, and intervention outcomes as contracted	Data Processing Agreement; access limited to authorised Client representatives; raw test data and item-level responses are never disclosed
Microsoft Corporation	Cloud hosting and storage via Microsoft 365 Business and OneDrive for Business; email via Microsoft Exchange Online	Microsoft Data Protection Addendum (DPA); Standard Contractual Clauses (SCCs) for international transfers; ISO 27001 and SOC 2 certified; data encrypted at rest and in transit
Sub-processors / Service Providers	IT support, assessment platform providers, payment processors	Written Data Processing Agreements; security assessments; access limited to what is strictly necessary
HPCSA and Professional Bodies	Professional audits, ethical investigations, continuing professional development records	Statutory obligation; data disclosed only as required by law or professional regulation
Regulatory Authorities	Information Regulator (SA), Data Protection Authorities (EU), SARS, Department of Labour	Only in response to lawful requests, subpoenas, or statutory obligations
Legal and Professional Advisors	Legal advice, audit, insurance	Professional privilege or duty of confidentiality; Data Processing Agreements where applicable
Research Partners	Assessment validation and norming studies	Only with anonymised/de-identified data or explicit consent; ethics committee approval where required

### 8.2 No Sale of Personal Information

Bonela does not sell, rent, lease, or trade Personal Information or Personal Data to any third party for marketing or commercial purposes.

## 9. International and Cross-Border Data Transfers

### 9.1 South Africa to EEA

Where we transfer Personal Information from South Africa to the EEA (or vice versa), we ensure that the transfer is lawful under both POPIA and the GDPR:

- POPIA section 72 permits transborder transfers where the recipient country provides an adequate level of protection. The EU/EEA is generally regarded as providing adequate protection for purposes of POPIA.
- For transfers from the EEA to South Africa (which does not currently benefit from an EU adequacy decision under GDPR Article 45), we rely on Standard Contractual Clauses (SCCs)

adopted by the European Commission pursuant to GDPR Article 46(2)(c), supplemented by Transfer Impact Assessments where required.

## 9.2 Microsoft Data Residency

Our Microsoft 365 Business tenant is configured with the South African data centre region as the primary data location. Microsoft may process certain administrative and diagnostic data in other regions in accordance with its Data Protection Addendum. We have executed the Microsoft Data Protection Addendum, which incorporates Standard Contractual Clauses for transfers outside the EEA.

## 9.3 Supplementary Measures

In accordance with the EDPB Recommendations 01/2020, we implement the following supplementary measures for international transfers:

- Encryption of data in transit (TLS 1.2+) and at rest (AES-256)
- Pseudonymisation of Assessment Data where technically feasible
- Access controls limiting data access to authorised personnel on a need-to-know basis
- Regular Transfer Impact Assessments
- Contractual commitments to challenge disproportionate government access requests

## 10. Data Security

### 10.1 Technical Measures

- Microsoft 365 Business security features including Advanced Threat Protection, Data Loss Prevention (DLP), and Microsoft Defender
- Multi-factor authentication (MFA) enforced for all user accounts
- Conditional Access policies restricting access by device, location, and risk level
- OneDrive for Business encryption at rest (BitLocker, service encryption) and in transit (TLS 1.2+)
- Microsoft Information Protection sensitivity labels applied to confidential assessment documents
- Azure Active Directory / Entra ID identity and access management
- Regular security assessments, vulnerability scanning, and penetration testing
- Endpoint protection on all devices accessing Bonela systems
- Automated data backup and disaster recovery procedures

### 10.2 Organisational Measures

- Role-based access control (RBAC) with least-privilege principle
- Mandatory data protection and information security training for all staff
- Background screening for employees with access to Personal Information
- Clean desk and clear screen policies
- Incident response plan and data breach notification procedures
- Regular internal audits and compliance reviews
- Third-party vendor risk assessments before onboarding any sub-processor
- Non-disclosure agreements with all employees and contractors
- Assessor Code of Conduct governing ethical handling of assessment data

### 10.3 Physical Measures

- Restricted physical access to office premises where Personal Information is processed
- Secure storage of any physical assessment materials
- Controlled disposal of physical documents via shredding

## 11. Data Retention

We retain Personal Information only for as long as necessary to fulfil the purposes for which it was collected, or as required by law. The following retention schedule applies:

Data Category	Retention Period	Legal Basis
Psychometric assessment reports	Minimum 5 years from date of assessment	HPCSA professional requirements; POPIA s14; contractual obligations
Raw test data and item responses	Minimum 5 years from date of assessment	HPCSA professional requirements
Training attendance and completion records	5 years from date of training	Skills Development Act; B-BBEE Act; contractual obligations

Data Category	Retention Period	Legal Basis
Client contractual records	5 years after contract expiry	Prescription Act 68 of 1969; POPIA s14
Financial and tax records	5 years from end of relevant tax year	Tax Administration Act; Companies Act
Employee records	Duration of employment plus 5 years	BCEA, LRA, Employment Equity Act, POPIA
Website analytics and cookies	Maximum 13 months	ePrivacy Directive; POPIA
Marketing consent records	Duration of consent plus 1 year	POPIA; GDPR; CPA
Data breach records	5 years from date of breach	POPIA; GDPR
CCTV footage (if applicable)	30 days unless required for investigation	POPIA

Upon expiry of the relevant retention period, Personal Information is securely destroyed using methods appropriate to the medium (secure deletion for electronic records; shredding for physical records). De-identified and aggregated statistical data may be retained indefinitely for research and benchmarking purposes.

## 12. Rights of Data Subjects

### 12.1 Rights under POPIA

Data Subjects in South Africa have the following rights under POPIA:

- **Right of access (s23):** to request confirmation of whether we hold Personal Information about you, and to request access to such information.
- **Right to correction (s24):** to request correction or deletion of Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully.
- **Right to deletion (s24):** to request destruction or deletion of Personal Information in certain circumstances.
- **Right to object (s11(3)):** to object to processing based on legitimate interests, and to object to processing for direct marketing.
- **Right not to be subject to automated decision-making (s71):** to not be subject to a decision based solely on automated processing that has legal effects or similarly significant effects.
- **Right to lodge a complaint:** to lodge a complaint with the Information Regulator of South Africa.

### 12.2 Rights under GDPR

Data Subjects in the EEA have the following additional or equivalent rights under GDPR:

- **Right of access (Art. 15):** to obtain confirmation of processing and a copy of the personal data being processed.
- **Right to rectification (Art. 16):** to have inaccurate personal data corrected without undue delay.
- **Right to erasure (Art. 17):** to request deletion of personal data in specified circumstances ("right to be forgotten").
- **Right to restriction of processing (Art. 18):** to request restriction of processing in certain circumstances.
- **Right to data portability (Art. 20):** to receive personal data in a structured, commonly used, machine-readable format and to transmit that data to another controller.
- **Right to object (Art. 21):** to object to processing based on legitimate interests or for direct marketing purposes.
- **Right not to be subject to automated decision-making (Art. 22):** to not be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects.
- **Right to withdraw consent (Art. 7(3)):** to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to lodge a complaint:** to lodge a complaint with a supervisory authority in the EEA Member State of habitual residence, place of work, or place of the alleged infringement.

### 12.3 Exercising Your Rights

To exercise any of the above rights, please contact our Information Officer using the details in Section 3. We will respond to verified requests within:

- POPIA: A reasonable time, not exceeding 30 days.

- GDPR: Without undue delay, and in any event within one calendar month (extendable by two further months for complex or numerous requests, with prior notification).

We may request verification of identity before processing your request. There is no fee for exercising your rights, unless requests are manifestly unfounded or excessive, in which case a reasonable administrative fee may be charged.

## **12.4 Assessment-Specific Rights**

In addition to the statutory rights above, Candidates have the following rights specific to psychometric assessments:

- The right to receive individual feedback on assessment results from a registered professional, in accordance with HPCSA ethical rules.
- The right to request that assessment results not be disclosed to the Client before receiving feedback.
- The right to request a reassessment where there is a reasonable belief that the assessment results do not accurately reflect the Candidate's abilities or characteristics, subject to professional judgment and assessment instrument guidelines.
- The right to know which assessment instruments were used and why.

## 13. Automated Decision-Making and Profiling

Bonela uses psychometric assessment instruments that involve algorithmic scoring and profiling. This constitutes automated processing under POPIA section 71 and GDPR Article 22.

### 13.1 Nature of Automated Processing

- Assessment instruments automatically calculate scores based on Candidate responses.
- Norm-referenced scoring compares Candidate results against relevant population norms.
- Job-fit algorithms may generate compatibility scores or recommendations.

### 13.2 Safeguards

We implement the following safeguards to ensure fair and transparent automated processing:

- No decision with legal or similarly significant effect is made solely on the basis of automated processing. A registered professional always reviews, interprets, and contextualises assessment results before any recommendation is made.
- Candidates are informed of the existence of automated processing via the Candidate Consent Form.
- Candidates may request human intervention, express their point of view, and contest decisions that are influenced by assessment results.
- Assessment instruments are regularly validated for fairness and bias, in compliance with the Employment Equity Act and HPCSA standards.

## 14. Children's Data

Bonela does not knowingly collect or process Personal Information of children under the age of 18 (in terms of POPIA) or under the age of 16 (in terms of GDPR, or the age specified by the applicable Member State) without the prior written consent of a competent person (parent, guardian, or person having authority).

Where assessments are conducted on minors (for example, in educational or career guidance contexts), explicit consent is obtained from the competent person, and all HPCSA ethical requirements for working with minors are strictly observed.

## 15. Direct Marketing

We may use your contact information to send you information about our services, events, and thought leadership content. We will only do so:

- With your prior opt-in consent (POPIA s69; GDPR Art. 6(1)(a)); or
- Where you are an existing client and the marketing relates to similar services (GDPR Recital 47 soft opt-in), and you have the opportunity to opt out at any time.

Every marketing communication includes a clear, functional unsubscribe mechanism. You may also opt out by emailing [privacy@bonelaconsulting.com](mailto:privacy@bonelaconsulting.com).

## 16. Cookies and Website Privacy

Our website uses cookies and similar tracking technologies. For full details, please refer to our separate Website Privacy Notice and Cookie Policy, available at <https://bonelaconsulting.com/privacy>.

In summary:

- Strictly necessary cookies are deployed without consent as they are essential for website functionality.
- Analytics, performance, and marketing cookies are only deployed after the visitor has given informed consent via our cookie consent banner.
- Visitors may withdraw cookie consent at any time via the cookie settings accessible on every page.

## **17. Data Breach Notification**

### **17.1 POPIA (Section 22)**

In the event of a security compromise involving Personal Information, Bonela will:

13. Notify the Information Regulator of South Africa as soon as reasonably possible after becoming aware of the compromise.
14. Notify affected Data Subjects as soon as reasonably possible, unless identity is unknown, law enforcement requests a delay, or a public communication would be adequate.
15. Provide sufficient information to allow Data Subjects to take protective measures.

### **17.2 GDPR (Articles 33–34)**

For Data Subjects in the EEA:

16. We will notify the relevant supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware of a personal data breach, unless the breach is unlikely to result in a risk to rights and freedoms.
17. Where a breach is likely to result in a high risk to rights and freedoms, we will notify affected Data Subjects without undue delay.
18. Where Bonela acts as Processor, we will notify the Controller without undue delay upon becoming aware of a breach.

### **17.3 Breach Response**

Our Incident Response Plan includes:

- Immediate containment and assessment of the breach
- Documentation and root cause analysis
- Notification to relevant regulatory authorities and affected individuals
- Remediation measures to prevent recurrence
- Post-incident review and policy updates

## 18. Data Protection Impact Assessments

In accordance with GDPR Article 35 and POPIA best practice, Bonela conducts Data Protection Impact Assessments (DPIAs) before initiating any processing that is likely to result in a high risk to the rights and freedoms of Data Subjects. This includes, but is not limited to:

- Large-scale processing of special categories of personal data (e.g., psychometric assessment programmes)
- Systematic evaluation of personal aspects (profiling)
- New assessment instruments or delivery platforms
- Changes in sub-processors or international transfer mechanisms

## 19. Sub-Processors

Bonela engages the following categories of sub-processors. A current list of specific sub-processors is available upon request:

Sub-Processor Category	Purpose	Location
Microsoft Corporation	Microsoft 365 Business: email, document storage (OneDrive/SharePoint), collaboration (Teams)	South Africa (primary); global (certain services)
Psychometric Assessment Platform Providers	Online assessment delivery, scoring, and reporting	South Africa / EEA (varies by platform)
Website Hosting Provider	Hosting of bonelaconsulting.com	To be confirmed
Payment Gateway	Processing of client payments	South Africa
IT Support and Managed Services	Technical support, system maintenance	South Africa

We will not engage a new sub-processor without entering into a written Data Processing Agreement that imposes equivalent data protection obligations. Where we act as Processor for a Client, we will provide prior notification of new sub-processors as required by the DPA.

## 20. Governing Law and Jurisdiction

This Policy is governed by the laws of the Republic of South Africa. For Data Subjects in the EEA, the provisions of the GDPR and applicable Member State law apply in addition to South African law. Nothing in this Policy limits the rights of Data Subjects under mandatory applicable law.

## 21. Changes to this Policy

We may update this Policy from time to time to reflect changes in our practices, legal requirements, or regulatory guidance. Material changes will be communicated via:

- A prominent notice on our website
- Direct email notification to affected Data Subjects (where feasible and appropriate)
- Notification to Clients under existing contractual arrangements

The current version of this Policy is always available at <https://bonelaconsulting.com/privacy>.

## 22. Contact and Complaints

For any questions, requests, or complaints regarding this Policy or our data processing practices, please contact:

<b>Information Officer</b>	Eugene Viljoen
<b>Email</b>	Eugene.viljoen@bonelaconsulting.com
<b>Telephone</b>	+27 83 264 6275
<b>Postal Address</b>	PO Box 133, George, Western Cape, South Africa, 6530

If you are not satisfied with our response, you have the right to lodge a complaint with:

### South Africa

**Information Regulator:** <https://infoeregulator.org.za>

**Email:** [complaints.BI@infoeregulator.org.za](mailto:complaints.BI@infoeregulator.org.za)

**HPCSA:** <https://www.hpcsa.co.za>

### European Union / EEA

The supervisory authority of the EU/EEA Member State in which you reside, work, or where the alleged infringement occurred. A list of supervisory authorities is available at: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)