



Privacy Policy



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PRIVACY POLICY

Effective Date: 2026/04/08

Responsible Party: Innovate Management Consultants (Pty) Ltd, registration number 2021/374903/07, operating from South Africa.

1. Introduction

- 1.1 We respect privacy and are committed to processing personal information lawfully and responsibly.
- 1.2 This Privacy Policy explains how we collect, use, disclose, store, secure, and otherwise process personal information through the Website and related business interactions.

2. Scope

- 2.1 This Privacy Policy applies to personal information processed through:
 - 2.1.1 the Website;
 - 2.1.2 contact forms, quote requests, newsletter sign-ups, consultations, enquiries, and event registrations;
 - 2.1.3 email, telephone, messaging, and social media interactions linked to the Website; and
 - 2.1.4 any related digital or administrative process described in this Policy.

3. Definitions

- 3.1 In this Policy:
 - 3.1.1 **“personal information”** has the meaning given in POPIA and includes information relating to an identifiable, living natural person and, where applicable, an identifiable juristic person;
 - 3.1.2 **“data subject”** means the person or juristic person to whom personal information relates;
 - 3.1.3 **“processing”** includes collection, receipt, recording, organization, storage, updating, retrieval, use, dissemination, combination, restriction, deletion, and destruction;
 - 3.1.4 **“operator”** means a third party that processes personal information for us under a contract or mandate.

4. Personal Information We May Collect

Depending on how you interact with us, we may collect:

4.1 Identification and contact information

- 4.1.1 Full name, business name, company registration number, job title, email address, telephone number, physical address, billing details, and correspondence details.

4.2 Service and transaction information

4.2.1 Nature of enquiry, project details, service requirements, contract information, invoices, payment references, records of consultations, and instructions provided to us.

4.3 Website usage and technical information

4.3.1 IP address, browser type, operating system, device identifiers, referring URLs, pages visited, time spent on pages, cookies, analytics identifiers, log data, and approximate location derived from IP data.

4.4 Marketing and communication information

4.4.1 Subscription preferences, consent records, attendance history, campaign interactions, and communication preferences.

4.5 Compliance and due diligence information

4.5.1 Where necessary, identity verification records, compliance declarations, sanctions screening results, tax information, and records required for risk, legal, or regulatory purposes.

4.6 Special personal information

4.6.1 We do not intentionally collect special personal information unless strictly necessary, lawfully permitted, and subject to appropriate safeguards.

5 Sources of Personal Information

5.1 We may collect personal information directly from you, automatically through the Website, from your employer or representatives, from publicly available sources, from service providers, and from third parties where you have consented or where permitted by law.

6 Lawful Bases and Reasons for Processing

6.1 We process personal information only where a lawful basis exists, including where processing is necessary:

- 6.1.1 to take steps at your request before entering into a contract;
- 6.1.2 to conclude or perform a contract;
- 6.1.3 to comply with legal or regulatory obligations; - to pursue our legitimate business interests in a manner that does not override your rights;
- 6.1.4 to protect a legitimate interest of the data subject;
- 6.1.5 because you have consented; or
- 6.1.6 for another purpose permitted under POPIA.

7 Purposes of Processing

7.1 We may process personal information for the following purposes:

- 7.1.1 providing and administering our Website and services;
- 7.1.2 responding to enquiries and communicating with users;
- 7.1.3 generating quotations, proposals, engagements, and invoices;
- 7.1.4 client onboarding and due diligence;

- 7.1.5 managing customer relationships and support;
- 7.1.6 analytics, internal reporting, service improvement, and Website optimization;
- 7.1.7 information security, fraud prevention, and system integrity;
- 7.1.8 record-keeping, governance, legal compliance, and dispute management;
- 7.1.9 direct marketing where lawful; and
- 7.1.10 any ancillary purpose reasonably related to the above.

8 Cookies and Similar Technologies

- 8.1 We may use cookies, pixels, tags, scripts, and analytics tools to operate the Website, remember preferences, measure traffic, enhance security, and improve user experience.
- 8.2 Some cookies are essential, while others are optional analytics or marketing cookies.
- 8.3 You may disable cookies in your browser settings, but parts of the Website may not function correctly as a result.

9 Direct Marketing

- 9.1 We may send direct marketing communications only where lawful.
- 9.2 You may opt out at any time by using the unsubscribe facility or contacting us.
- 9.3 We will maintain opt-out records to ensure compliance.

10 Disclosure of Personal Information

- 10.1 We may disclose personal information to:
 - 10.1.1 employees, contractors, and advisers who need it on a need-to-know basis;
 - 10.1.2 IT, hosting, analytics, CRM, cloud, payment, and administrative service providers;
 - 10.1.3 auditors, insurers, banks, and professional advisers;
 - 10.1.4 regulators, law enforcement, courts, tribunals, and public authorities where required;
 - 10.1.5 counterparties and transaction advisers in corporate transactions, restructuring, financing, or due diligence processes; and
 - 10.1.6 any other person where disclosure is reasonably necessary, legally required, or lawfully permitted.
- 10.2 We do not sell personal information as a standalone data commodity.

11 Cross-Border Transfers

- 11.1 Your personal information may be stored or processed in jurisdictions outside South Africa, including where we use cloud or software providers with international infrastructure.

- 11.2 Where cross-border transfers occur, we will take reasonable steps to ensure that the recipient is subject to laws, binding corporate rules, contracts, or safeguards that provide an adequate level of protection, or that another lawful basis for transfer exists.

12 Retention

- 12.1 We retain personal information only for as long as reasonably necessary for the purpose for which it was collected, or as required by law, contract, record-keeping obligations, dispute resolution needs, or legitimate business requirements.
- 12.2 Thereafter, we may delete, destroy, anonymize, or de-identify it in accordance with our retention practices and applicable law.

13 Security Safeguards

- 13.1 We implement reasonable technical and organizational measures to protect personal information against loss, misuse, unauthorized access, disclosure, alteration, or destruction.
- 13.2 These measures may include access controls, authentication controls, contractual restrictions, secure hosting environments, encryption where appropriate, backups, and incident response procedures.
- 13.3 However, no system is completely secure, and we cannot guarantee absolute security.

14 Data Subject Rights

- 14.1 Subject to POPIA and other applicable law, you may have the right to:
 - 14.1.1 request confirmation of whether we hold personal information about you;
 - 14.1.2 request access to your personal information;
 - 14.1.3 request correction, updating, or deletion of inaccurate, irrelevant, excessive, outdated, incomplete, misleading, or unlawfully obtained personal information;
 - 14.1.4 object to processing on legitimate grounds;
 - 14.1.5 object to direct marketing;
 - 14.1.6 withdraw consent where processing is based on consent; and
 - 14.1.7 lodge a complaint with the Information Regulator.
- 14.2 Requests may be refused or limited where permitted by law, including where legal privilege, confidentiality, statutory obligations, disproportionate effort, or competing rights apply.

15 Breach Response

- 15.1 Where required by law, we will notify affected persons and/or the Information Regulator of a security compromise involving personal information.

16 Children

- 16.1 The Website is not directed at children.
- 16.2 We do not knowingly collect personal information from children unless lawfully permitted and properly authorized.

17 Third-Party Platforms

- 17.1 The Website may integrate with or link to third-party platforms.
- 17.2 We are not responsible for third-party privacy notices, data practices, or security standards.
- 17.3 Users should review those third-party policies separately.

18 Complaints and Contact Details

- 18.1 For privacy-related requests or complaints, contact:
 - Information Officer:** DJJ Jacobs
 - Email:** info@innovateconsultants.co.za
 - Telephone:** (+27) 82 386 1740
- 18.2 You may also lodge a complaint with the **Information Regulator (South Africa)**.

19 Changes to this Policy

- 19.1 We may update this Privacy Policy from time to time.
- 19.2 The latest published version will govern our processing of personal information from its effective date.