

GRC LINK (PTY) LTD

Business Management System Specialists

Privacy Policy & Access to Information Manual

In terms of the Protection of Personal Information Act 4 of 2013 (POPIA) and the Promotion of Access to Information Act 2 of 2000 (PAIA)

Document Reference	POL013
Version	1.0
Effective Date	17 June 2025
Review Date	17 June 2026
Document Owner	Thornton van Wyngaardt
Classification	Public

PART 1: PRIVACY POLICY (POPIA COMPLIANCE)

1. Introduction and Purpose

GRC Link (Pty) Ltd ("GRC Link", "we", "us", "our") is a South African business management system specialist providing ISO-aligned management system consulting, gap analysis, SHEQ data management, and web-based compliance software. We are committed to protecting the personal information of our clients, employees, partners, and website visitors in full compliance with the Protection of Personal Information Act 4 of 2013 (POPIA).

This Privacy Policy explains what personal information we collect, why we collect it, how we use and protect it, and what your rights are as a data subject. POPIA is fully in effect as of 1 July 2021 and non-compliance may result in fines of up to R10 million or criminal prosecution.

2. Definitions

Term	Definition
Data Subject	The natural or juristic person to whom personal information relates.
Information Officer	The person responsible for compliance with POPIA and PAIA at GRC Link, being Thornton van Wyngaardt.
Operator	A person who processes personal information on behalf of GRC Link under a written agreement.
Personal Information	Any information relating to an identifiable, living, natural person or juristic person, including name, contact details, identity number, financial information, and correspondence records.
Processing	Any operation performed on personal information, including collection, receipt, recording, organisation, storage, updating, distribution, or destruction.
Responsible Party	GRC Link (Pty) Ltd, which determines the purpose and means of processing personal information.

Special Personal Information	Information on religious or philosophical beliefs, race, trade union membership, political persuasion, health, sex life, biometric information, or criminal behaviour.
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3. Information We Collect

GRC Link collects and processes the following categories of personal information:

Category	Examples	Lawful Basis
Identification details	Full name, job title, ID number (where required)	Contract / Consent
Contact information	Email address, phone number, physical address	Contract / Legitimate interest
Business information	Company name, registration number, industry, position held	Contract / Legitimate interest
Communication records	Emails, proposals, meeting notes, service requests	Contract / Legitimate interest
Website usage data	IP address, browser type, pages visited, cookies	Consent (cookie banner)
Management system data	ISO-aligned documentation, SHEQ records, audit data, operational procedures submitted for our services	Contract
Financial information	Banking details, invoices, payment records (where applicable for billing)	Contract / Legal obligation

We do not intentionally collect special personal information unless it is strictly necessary and you have provided explicit consent. We do not collect personal information from minors under 18 without verified parental consent.

4. Lawful Basis and Purpose of Processing

GRC Link processes personal information only where at least one of the following lawful bases applies under POPIA:

Lawful Basis	How GRC Link applies it
Consent	You have given clear consent for newsletter subscriptions, marketing communications, or cookie use.
Contract	Processing is necessary to fulfil a service agreement with you or to take pre-contractual steps at your request.
Legal obligation	Processing is required to comply with South African law (e.g. SARS, CIPC, labour legislation).
Legitimate interest	Processing is necessary for GRC Link's legitimate business interests where these do not override your rights, e.g. business development, service improvement, fraud prevention.

Specific purposes for which we process personal information include:

- To provide consulting services and implement ISO-aligned management systems.
- To operate and maintain our web-based SHEQ management platform.
- To communicate service updates, findings, and deliverables to clients.

- To send newsletters and marketing material – only where you have given consent, which you may withdraw at any time.
- To process payments and maintain financial records as required by law.
- To comply with legal, regulatory, and contractual obligations.
- To improve our website, services, and client experience.
- To respond to queries, complaints, and access requests.

5. Consent and Withdrawal

Where our lawful basis for processing is consent, we will obtain your express, informed, and specific consent before processing. You have the right to withdraw consent at any time by contacting our Information Officer at thornton@grclink.online. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

6. Data Sharing and Third-Party Operators

GRC Link does not sell, rent, or trade personal information. We may share personal information only in the following circumstances:

- With third-party service providers (operators) who assist us in delivering our services, including cloud hosting providers, payment processors, and IT support – under written data processing agreements that require them to protect your information.
- With professional advisers such as auditors, attorneys, and accountants, under confidentiality obligations.
- Where required or permitted by South African law, a court order, or a regulatory authority.
- With your explicit consent in any other circumstance.

Any operator processing personal information on our behalf is contractually bound to comply with POPIA and to process data only on our documented instructions.

7. Trans-Border Information Flows

GRC Link may use cloud services or software platforms whose servers are located outside South Africa. Where personal information is transferred to a foreign country, we will ensure that the recipient is subject to a law, binding corporate rules, or a binding agreement that provides an adequate level of protection substantially similar to POPIA, in line with section 72 of POPIA.

8. Data Security

GRC Link implements appropriate, reasonable technical and organisational measures to protect personal information against:

- Unauthorised access, acquisition, or use.
- Loss, damage, or destruction.
- Unlawful processing or disclosure.

Our security measures include role-based access controls, encrypted data transmission (TLS/SSL), password-protected systems, regular security reviews, and staff awareness training. Despite these measures, no system is completely secure; in the event of a compromise, we will act promptly in terms of our data breach notification obligations.

9. Data Breach Notification

In the event of a data breach that is likely to affect your personal information, GRC Link will:

- Notify the Information Regulator as soon as reasonably possible after becoming aware of the breach, in the manner prescribed.
- Notify affected data subjects as soon as reasonably possible where there is a real risk of harm.
- Take immediate steps to contain and remediate the breach.

Notifications will include the nature of the breach, the personal information involved, the likely consequences, and the steps taken to address it.

10. Data Retention and Disposal

We retain personal information only for as long as is necessary to fulfil the purposes for which it was collected, or as required by law. Our general retention guidelines are:

Data Type	Retention Period	Legal Basis
Client service records	5 years after contract ends	Contract / Legal
Financial / tax records	5 years (SARS requirement)	Legal obligation
Marketing / newsletter consent	Until consent withdrawn	Consent
Website usage / cookies	Up to 12 months	Consent

Once information is no longer required, it will be destroyed or de-identified in a secure manner.

11. Your Rights as a Data Subject

Under section 5 of POPIA, you have the following rights regarding your personal information:

Right	Description
Right to be notified	To be informed when your personal information is collected and how it will be used.
Right of access	To request confirmation of what personal information we hold about you and to receive a copy.
Right to correction	To request correction or deletion of inaccurate, incomplete, or outdated information.
Right to object	To object to the processing of your personal information on reasonable grounds.
Right to erasure	To request deletion of your personal information where processing is unlawful or no longer necessary.
Right to withdraw consent	To withdraw consent at any time where processing is based on consent.
Right to complain	To lodge a complaint with the Information Regulator if you believe your rights have been violated.
Right not to be subject to automated decisions	To not be subject to a decision based solely on automated processing that has legal or similarly significant effects.

To exercise any of these rights, submit a written request to our Information Officer at thornton@grclink.online. We will respond within a reasonable time, and in any event within 30 days.

12. Direct Marketing

GRC Link will only send direct marketing communications (including newsletters and promotional emails) to you where you have given your prior consent (opt-in). Every marketing communication will include an unsubscribe mechanism. If you opt out, we will cease direct marketing communications within a reasonable time. We will not make unsolicited electronic marketing calls or messages without your prior consent.

13. Cookies and Website Data

GRC Link's website (<https://grclink.online>) uses cookies to improve user experience and gather analytics. Cookies are only placed after you have acknowledged and accepted our cookie notice. You may manage or disable cookies through your browser settings; however, this may affect website functionality. We do not use cookies to collect special personal information.

14. Information Officer Details

Name	Thornton van Wyngaardt
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Role	Information Officer – GRC Link (Pty) Ltd
Email	thornton@grclink.online
Phone	+27 78 556 5480
Physical Address	53 Roy Campbell Street, Brackenhurst, Alberton, 1449
Website	https://grclink.online

The Information Regulator of South Africa may also be contacted:

Information Regulator	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 infoereg@justice.gov.za +27 10 023 5207
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PART 2: ACCESS TO INFORMATION MANUAL (PAIA COMPLIANCE)

1. Introduction

This manual has been compiled in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and section 17 of POPIA, which requires responsible parties to maintain a record of all processing operations. All exemptions for private bodies from the obligation to compile a PAIA manual have lapsed. GRC Link (Pty) Ltd is a private body as defined in section 1 of PAIA.

This manual is available to any person upon request and is published on our website at <https://grclink.online>.

2. Company Details

Registered Name	GRC Link (Pty) Ltd
Trading Name	GRC Link
Business Description	Business Management System Specialists – ISO consulting, SHEQ management systems, gap analysis, web-based compliance platform
Physical Address	53 Roy Campbell Street, Brackenhurst, Alberton, 1449
Website	https://grclink.online
Information Officer	Thornton van Wyngaardt
Email	thornton@grclink.online
Phone	+27 78 556 5480

3. Guide on the Use of PAIA

The Information Regulator has compiled a guide on how to use PAIA (the "Guide"), which is available on the Information Regulator's website at www.inforegulator.org.za. The Guide is available in all official South African languages and is available for inspection at the offices of GRC Link during business hours at no charge.

4. Records Available Without a PAIA Request

The following categories of records are available to the public without submitting a formal PAIA request:

- This Privacy Policy and PAIA Manual (published on our website).
- GRC Link's company registration details (available via CIPC).
- General service descriptions and pricing information published on our website.
- General information about ISO standards and management system frameworks available on our website or communicated in our marketing material.

5. Records Held by GRC Link

GRC Link holds the following categories of records in the conduct of its business:

5.1 Client and Service Records

- Client contracts, service agreements, and engagement letters.
- Gap analysis reports, audit findings, and ISO management system documentation.
- SHEQ data and management system records processed through our platform.
- Correspondence, proposals, and deliverables.

5.2 Personnel Records

- Employment contracts and HR records.
- Payroll and remuneration records.
- Training and competency records.
- Leave records.

5.3 Financial Records

- Annual financial statements.
- Invoices, receipts, and payment records.
- Tax records and SARS submissions.

5.4 Corporate / Governance Records

- Company registration documents (MOI, share register).
- Director and officer information.
- Board or management resolutions.

5.5 Information Technology Records

- IT system access logs (for security purposes).
- Software licences and support agreements.
- Data processing agreements with operators.

5.6 POPIA Processing Records (Section 17 Register)

In compliance with section 17 of POPIA, GRC Link maintains a processing register that records:

- The purpose of each processing activity.
- Categories of data subjects and types of personal information processed.
- Recipients or categories of recipients to whom information may be disclosed.

- Any planned cross-border transfers of personal information.
- Retention periods and destruction schedules.
- A general description of security measures implemented.

This register is available to the Information Regulator on request.

6. Records Available Under Other Legislation

GRC Link also holds records available in terms of the following applicable legislation (non-exhaustive):

- Companies Act 71 of 2008 – company records, financial statements.
- Labour Relations Act 66 of 1995 – employment contracts, disciplinary records.
- Basic Conditions of Employment Act 75 of 1997 – leave and remuneration records.
- Income Tax Act 58 of 1962 – tax records.
- Electronic Communications and Transactions Act 25 of 2002 – electronic communications.
- Occupational Health and Safety Act 85 of 1993 – relevant SHEQ records (where applicable).

7. How to Request Access to Information

Any person who wishes to access records held by GRC Link must submit a written request in the prescribed Form C (PAIA Form 2), which is available from the Information Regulator's website (www.inforegulator.org.za).

Requests must:

- Be addressed in writing to the Information Officer at the address or email below.
- Describe the record(s) sought with sufficient detail to enable identification.
- Identify the right being exercised or protected and explain why access is required.
- Indicate the preferred form of access (copy, inspection, etc.).
- Include proof of identity of the requester.

Submit requests to

Thornton van Wyngaardt | thornton@grclink.online | +27 78 556 5480 |
53 Roy Campbell Street, Brackenhurst, Alberton, 1449

GRC Link will acknowledge receipt within 5 business days and provide a decision within 30 days of receipt, which may be extended by a further 30 days in exceptional circumstances.

8. Fees

In terms of PAIA and the PAIA Regulations:

- No fee is payable for submitting a request for access.
- A request fee of R50.00 is payable before a search for the record is undertaken (unless the requester is seeking their own personal information, in which case no request fee applies).
- An access fee may be charged for reproduction and search time, calculated in accordance with the PAIA Regulations.
- Where an access fee is applicable, GRC Link will provide a written estimate before processing the request. A deposit may be required where fees exceed R600.00.
- Persons who cannot afford the fee may apply for a fee waiver if the requested information is required in the public interest.

9. Grounds for Refusal

GRC Link may refuse access to records on the grounds set out in PAIA, including:

- Protection of personal information of a third party (Part 3, Chapter 4 of PAIA).
- Protection of commercial information of a third party, including trade secrets (section 64).
- Protection of confidential information of a third party (section 65).
- Protection of safety of an individual (section 66).
- Protection of records that are legally privileged (section 67).

- Protection of commercial information of GRC Link, where disclosure could reasonably be expected to harm GRC Link’s competitive position (section 68).
- Records that are research information the disclosure of which would expose the research or researcher (section 69).

Where access is refused in whole or in part, GRC Link will provide written reasons for the refusal.

10. Remedies for Refusal

If your request for access is refused, you may:

- Apply to the Information Regulator for relief in terms of section 74 of PAIA (no fee payable).
- Apply to the High Court for relief in terms of section 82 of PAIA.

The Information Regulator can be contacted at:

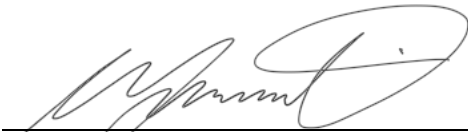
Information Regulator	JD House, 27 Stiemens Street, Braamfontein, Johannesburg infoereg@justice.gov.za +27 10 023 5207 www.infoeregulator.org.za
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DOCUMENT CONTROL AND REVIEW

This policy will be reviewed annually or whenever there is a material change in applicable law, GRC Link’s operations, or the Information Regulator’s guidance. GRC Link is committed to keeping this document current and accurate.

Version	Date	Summary of Changes
1.0	17 June 2025	Initial issue – full alignment with POPIA and PAIA best practice

Approved by:



Thornton van Wyngaardt – Information Officer, GRC Link (Pty) Ltd

Date: 17/06/2026