

PRIVACY POLICY

1. INTRODUCTION

mySHEQ.com is committed to protecting personal information and processing it responsibly, lawfully and transparently. This Privacy Policy and Privacy Notice explains what personal information mySHEQ may collect or receive, why it is processed, how it may be used and shared, how it is protected and retained, and the rights available to data subjects.

This notice applies to personal information processed by mySHEQ for its own business purposes and explains mySHEQ's role where it processes customer-controlled information through the mySHEQ Software-as-a-Service (SaaS) platform.

2. RESPONSIBLE PARTY AND CONTACT DETAILS

Where mySHEQ determines the purpose and means of processing personal information for its own business activities, mySHEQ acts as the Responsible Party for purposes of the Protection of Personal Information Act, 2013 (POPIA).

Privacy and data-subject enquiries may be submitted to:

Information Officer / Privacy Contact: privacy@mysheq.com

General support enquiries should continue to be directed through mySHEQ's normal support channels. Security incidents should be reported through the designated security incident channels.

3. PERSONAL INFORMATION WE PROCESS

Depending on the relationship and purpose, mySHEQ may process personal information including:

- Name, surname and other identifying information;
- ID number or other identification information where legitimately required;
- Email address, telephone number, physical or postal address;
- Company, occupation, job title and business contact information;
- Banking and payment information where required for payments or business administration;
- Employment, payroll, contractual and related personnel information;
- Customer, supplier, reseller, contractor and business relationship information;
- Information submitted through website Contact, Demo, Download or similar enquiry channels;
- Communications and correspondence with mySHEQ;
- IP address, browser, device, operating-system and website usage information collected through cookies or analytics technologies; and
- Any other information voluntarily supplied to mySHEQ for a legitimate business purpose.

4. PURPOSES FOR PROCESSING PERSONAL INFORMATION

mySHEQ processes personal information only for identified and legitimate purposes, which may include:

- Providing, administering, maintaining, supporting and securing mySHEQ products and services;
- Managing customer, supplier, reseller, contractor and other business relationships;
- Responding to enquiries, demonstrations, quotations, support requests and other communications;
- Managing employees, contractors, payroll, tax, agreements, access and related employment administration;
- Processing payments, invoices, accounting records and financial administration;
- Authenticating users and managing access to systems and services;
- Providing transactional communications, notifications and service-related messages;
- Providing requested marketing and product communications where lawful and permitting recipients to opt out where applicable;
- Operating, analysing, securing and improving the public mySHEQ website and services;
- Preventing, detecting, investigating and responding to fraud, misuse, security incidents and technical problems;
- Meeting contractual commitments and exercising or defending legal rights;
- Complying with legal, regulatory, tax, accounting, audit and other lawful obligations; and

- Maintaining records reasonably required for governance, security, quality management and evidential purposes.

5. CUSTOMER-CONTROLLED INFORMATION IN THE mySHEQ SaaS PLATFORM

mySHEQ provides a cloud-based software platform that organisations use to manage their own Safety, Health, Environmental and Quality information and processes.

Where a customer captures, uploads, imports or otherwise provides personal information within its mySHEQ system, the customer ordinarily determines what information is processed, why it is processed, who may access it and how it is used. In these circumstances, the customer acts as the Responsible Party and mySHEQ processes the information as an Operator on the customer's instructions for the purpose of providing, maintaining, supporting and securing the mySHEQ service.

Customers are responsible for ensuring that they have an appropriate lawful basis for processing personal information within their mySHEQ system, for providing required privacy notifications to their data subjects, and for assigning appropriate access permissions to their authorised users.

The information a customer chooses to process may include ordinary and, where applicable, special personal information relevant to the customer's HSE and business processes. Customers may also upload documents and attachments whose contents are determined by the customer.

mySHEQ does not use customer-controlled personal information for its own marketing, profiling or unrelated commercial purposes.

6. HOW PERSONAL INFORMATION IS COLLECTED

Personal information may be collected directly from a data subject, from an organisation with which the data subject has a relationship, through contractual or business interactions, through the public website, through authorised system integrations, or from other lawful sources.

Where mySHEQ acts as Operator, customer information may be provided directly by the customer, its authorised users or customer-controlled integrations.

7. MANDATORY AND VOLUNTARY INFORMATION

The provision of personal information is generally voluntary unless it is required by law, contract, employment requirements, security requirements or in order to provide a requested service. Where required information is not provided, mySHEQ may be unable to provide the relevant service, process a request, conclude or administer an agreement, make a payment, provide system access or meet a legal obligation.

8. SHARING AND DISCLOSURE

mySHEQ does not sell or rent personal information to third parties for their own marketing purposes.

Personal information may be disclosed where reasonably necessary:

- To service providers and operators that assist mySHEQ with hosting, cloud storage, backups, email, communications, identity, analytics, payroll, accounting, banking, security and other legitimate business services;
- To professional advisers, insurers and incident-response specialists where required for legal, insurance, security or business purposes;
- To law-enforcement agencies, regulators, courts, government authorities or other parties where disclosure is required or permitted by law;
- To a customer/Responsible Party where mySHEQ processes the information as Operator for that customer; and
- To other recipients where the data subject has authorised the disclosure or another lawful basis applies.

Service providers are expected to process information only for the relevant service purpose and subject to appropriate contractual, confidentiality, privacy and security requirements where applicable.

9. INTERNATIONAL PROCESSING AND TRANSFERS

mySHEQ primarily processes corporate information in South Africa. Core customer production environments, databases, documents and backups are hosted within the applicable customer hosting region, including South Africa and Australia.

Certain supporting service providers used for communications, reporting, analytics and other services may process limited information in other jurisdictions. Appropriate safeguards are applied to international transfers in accordance with applicable data-protection requirements, including POPIA where applicable.

mySHEQ maintains internal records of material operators, processing locations and cross-border processing arrangements and reviews these as services and processing activities change.

10. WEBSITE, COOKIES AND ANALYTICS

The public mySHEQ website may use cookies and similar technologies to support website functionality and understand website usage. Google Analytics is used on the public website and is not used as an analytics service within individual customer SaaS systems.

Depending on configuration and technology, analytics information may include IP address, device and browser information, referring pages, access times and other usage information. Website visitors may be provided with cookie or browser controls where applicable.

11. DIRECT MARKETING AND COMMUNICATIONS

mySHEQ may communicate with existing customers, prospective customers and other business contacts about its products and services where permitted by law. Recipients may object to or unsubscribe from direct marketing communications through the mechanism provided in the communication or by contacting mySHEQ.

Where a person unsubscribes or objects to marketing, mySHEQ may retain the minimum information necessary to maintain a suppression record and prevent unwanted re-contact.

12. INFORMATION SECURITY

mySHEQ applies reasonable and appropriate organisational and technical safeguards designed to protect personal information against loss, unauthorised access, interference, alteration, disclosure or destruction.

These safeguards include controlled access, authentication and privileged-access controls, network and server security, encryption where implemented, customer data segregation, backups, vulnerability management, patching, logging, controlled development and deployment practices, endpoint protection, incident response and personnel confidentiality requirements.

No information system or method of electronic transmission can be guaranteed to be completely secure. mySHEQ therefore maintains ongoing security monitoring, assessment and remediation processes.

13. RETENTION AND DISPOSAL

mySHEQ retains personal information only for as long as reasonably necessary for the purpose for which it was collected, to provide contracted services, meet legal or regulatory obligations, or satisfy legitimate evidential and business requirements.

Different categories of information have different retention periods. Customer-controlled information is retained according to the applicable customer relationship and instructions, while statutory corporate records are retained for applicable legal periods. Information that is no longer required is securely deleted, destroyed or de-identified in accordance with the mySHEQ Data Retention & Disposal Schedule.

Because HSE records can remain relevant for long periods, customers may elect to retain operational records within their active mySHEQ system for extended periods according to their own legal, operational and evidential requirements.

14. DATA SUBJECT RIGHTS

Subject to applicable law and the circumstances of the processing, a data subject may request or exercise rights including:

- Confirmation of whether mySHEQ holds personal information about them;
- Access to applicable personal information;
- Correction or updating of inaccurate or incomplete information;
- Deletion or destruction of information where legally appropriate;
- Objection to certain processing;
- Withdrawal of consent where processing is based on consent;
- Objection to or unsubscribe from direct marketing; and
- Information regarding mySHEQ's processing of their personal information.

Requests should be submitted to privacy@mysheq.com. mySHEQ may take reasonable steps to verify the identity and authority of the requester before disclosing, changing or deleting personal information.

Where a request relates to information held within a customer's mySHEQ SaaS system, the request may be referred to or coordinated with the applicable customer because that customer ordinarily acts as the Responsible Party for that information. mySHEQ will not independently alter, disclose or permanently delete customer-controlled information contrary to the customer's lawful instructions.

15. SPECIAL PERSONAL INFORMATION

mySHEQ may process special personal information where this is lawful and necessary for its own legitimate activities. Customer organisations may also choose to process special personal information within their mySHEQ systems for their own HSE, employment, legal or operational purposes. In customer systems, the customer remains responsible for determining the lawful basis, purpose and appropriate access to such information.

mySHEQ applies access controls and other safeguards appropriate to the nature of information processed through the platform.

16. CHILDREN

mySHEQ does not intentionally use its public website to solicit personal information from children for marketing purposes. Where information relating to a child is processed within a customer-controlled mySHEQ system, the customer is responsible for ensuring that such processing is lawful and appropriately authorised.

17. AUTOMATED DECISION-MAKING

mySHEQ does not use personal information for solely automated decisions that produce legal or similarly significant effects on individuals unless such processing is lawfully implemented and appropriately disclosed. Customer-configured workflows, reports, notifications and business rules remain subject to the customer's responsibility for its processing purposes and decisions.

18. SECURITY INCIDENTS AND PERSONAL INFORMATION BREACHES

mySHEQ maintains a controlled Security Incident & Personal Information Breach Response Procedure. Suspected security incidents are investigated and managed according to their severity and applicable legal, contractual, insurance and notification requirements.

Where mySHEQ acts as Operator and customer-controlled information is affected, mySHEQ will notify and assist the applicable customer/Responsible Party as required. Where mySHEQ acts as Responsible Party, the Information Officer will assess and manage applicable regulatory and data-subject notification requirements.

19. COMPLAINTS

A person who has a concern regarding mySHEQ's processing of their personal information is encouraged to contact the Information Officer at privacy@mysheq.com so that the matter can be investigated and addressed.

Data subjects also have the right to lodge a complaint with the South African Information Regulator where applicable. Current regulator contact and complaint information should be obtained from the Information Regulator's official channels.

20. CHANGES TO THIS PRIVACY POLICY

mySHEQ may update this Privacy Policy from time to time to reflect changes in processing activities, systems, services, legal requirements or privacy practices. The current approved version will be published through the appropriate mySHEQ channels, including the public website where applicable.

Material changes may result in additional notification or training where appropriate.

21. CONTACT US

For privacy, POPIA or data-subject enquiries Email: privacy@mysheq.com

For ordinary product or customer-support enquiries, please use mySHEQ's normal support channels.