

**LexSolve**

CONSULTING (PTY) LTD

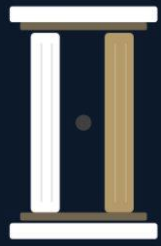
# **PROTECTION OF PERSONAL INFORMATION MANUAL & POLICY**

**LEXSOLVE CONSULTING (PTY) LTD  
(hereinafter referred to as Lexsolve)**

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**Version: 01**



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## 1. Preamble

Chapter 3 of the Protection of Personal Information Act 4 of 2013 (hereinafter referred to as POPIA) provides for the minimum conditions for lawful "*processing*" of "*personal information*" by a "*responsible party*" (as such terms are defined under POPIA). These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA. Lexsolve requires personal information relating to both natural and legal persons to carry out its business and organisational functions. The way this information is processed and the purpose for which it is processed is determined by Lexsolve.

Accordingly, Lexsolve is a responsible party for the purposes of POPIA and will ensure that the personal information of a "*data subject*" (as defined in POPIA), amongst other things as prescribed by POPIA:

1. is processed lawfully, fairly and transparently. This includes the provision of appropriate information to data subjects when their data is collected by Lexsolve, in the form of privacy or when data is collected. Lexsolve must also have a legal basis (for example, but not limited to, consent) to process personal information.
2. is processed only for the purposes for which it was collected.
3. will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
4. is adequate, relevant and not excessive for the purposes for which it was collected.
5. is accurate and kept up to date.
6. will not be kept for longer than necessary.
7. is processed in accordance with integrity and confidentiality principles. This includes physical and organisational measures to ensure that personal information, in both physical and electronic form, is subject to an appropriate level of security when stored, used and communicated by Lexsolve, to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage.
8. is processed in accordance with the rights of data subjects, where applicable.



## 2. INFORMATION OFFICER DETAILS

CONTACT DETAILS	
Name of Business	Lexsolve Consulting (Pty) Ltd
Designated contact person	Luttie Jacobs (Information Officer)
Physical address	6 Swarthout Street, Vredeklouf, Brackenfell, 7560
Telephone number	063 367 0620
Email address	<a href="mailto:luttie@lexsolve.co.za">luttie@lexsolve.co.za</a>

## 3. DATA SUBJECT RIGHTS

Data Subjects have the right to:

1. be notified that their personal information is being collected by Lexsolve. The data subject also has the right to be notified in the event of a data breach.
2. know whether Lexsolve holds personal information about them and to access that information. Any request for information must be handled in accordance with the provisions of this PAIA Manual.
3. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information.
4. object to Lexsolve's use of their personal information and request the deletion of such personal information (deletion would be subject to Lexsolve's record keeping requirements).
5. object to the processing of personal information for purposes of direct marketing by means of unsolicited electronic communications.
6. complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.



#### **4. PURPOSE OF PROCESSING OF PERSONAL INFORMATION**

In terms of the Protection of Personal Information Act (POPIA), Lexsolve processes personal information only for defined, lawful purposes related to our business functions. These primary purposes include, but are not limited to, performing obligations under a contract, managing customer and supplier relationships, processing employee payroll and benefits, and complying with statutory requirements such as tax or labour laws. We ensure that the collection of data is adequate, relevant, and not excessive, maintaining that no information is processed for any reason incompatible with the original purpose for which it was gathered unless specific consent is obtained or a legal exception applies.

#### **5. CATEGORIES OF DATA SUBJECTS**

In accordance with Section 1 of POPIA, Lexsolve maintains records on various categories of data subjects, including both natural persons (individuals) and juristic persons (entities such as companies or trusts). For natural persons, the personal information processed typically includes names, identity numbers, contact details, and financial information. For juristic persons, this includes registration numbers, tax-related information, and details of authorised representatives. These categories are processed to ensure the smooth execution of our professional services, legal compliance, and the maintenance of secure business relationships.

#### **6. SHARING OF PERSONAL INFORMATION**

Lexsolve may share a data subject's personal information with third parties only when necessary to fulfil the specific purposes outlined in this Manual or where required by law. Such disclosures typically involve professional service providers, regulatory bodies, and authorized operators who process information on our behalf under strict confidentiality agreements. We take reasonable steps to ensure that any recipient of this information has implemented appropriate technical and organisational measures to protect the data, ensuring that all sharing remains compliant with the conditions for lawful processing as set out in POPIA.



## **7. CROSS-BORDER FLOW OF PERSONAL INFORMATION**

Lexsolve recognises that its operations may require the transfer of personal information to recipients in foreign countries, such as when utilising global cloud storage, centralized group databases, or international service providers. In such instances, we ensure that these transborder flows comply with the requirements of Section 72 by verifying that the recipient is subject to laws, binding corporate rules, or a binding agreement that offers an "adequate level" of protection substantially like POPIA. Where adequacy cannot be established through local law, we will obtain the data subject's explicit, informed consent or ensure the transfer is strictly necessary for the performance of a contract or for the data subject's benefit. Furthermore, for transfers involving special personal information to jurisdictions lacking adequate protection, we will seek the required prior authorisation from the Information Regulator.

## **8. DESCRIPTION OF SECURITY MEASURES**

Lexsolve implements a comprehensive range of technical and organisational security measures to safeguard the integrity and confidentiality of personal information in its possession. To ensure physical security, all hard-copy records and storage media are kept in secured, locked facilities with access restricted to authorised personnel, supported by systems and secure off-site archiving when necessary. On a digital level, we employ robust access control through unique user credentials and password policies to ensure that employees only access data essential to their roles, alongside industry-standard encryption protocols for data in transit and at rest. Furthermore, our systems are protected by active firewalls and regularly updated anti-malware software to defend against external threats. These technical safeguards are reinforced by organisational measures, including mandatory staff training on POPIA compliance, the signing of confidentiality agreements by all employees and third-party operators, and a formal incident response procedure for reporting security breaches to the Information Regulator as required by Section 22 of the Act. The Information Officer also conducts periodic risk assessments and security audits to identify and mitigate foreseeable internal and external risks, ensuring that our protection measures remain current and effective.

## **9. OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION**

In accordance with Section 11(3) of POPIA and Regulation 2 of the POPIA Regulations, a data subject has the right to object, at any time and in the prescribed manner, to the processing of their personal information by Lexsolve. Such an objection must be based on reasonable grounds relating to the data subject's particular situation, unless the processing is for the purposes of direct marketing, in which case the data subject may object at any time without providing a specific reason. Upon receipt of a



valid objection, Lexsolve will immediately cease the processing of the affected personal information, unless legislation provides otherwise or the processing is necessary for the performance of a legal obligation. All objections must be submitted to the Information Officer using the official Form 1. A copy of the form is available upon request or via the Information Regulator's website.

## **10. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION**

In accordance with Section 24 of POPIA and Regulation 3 of the POPIA Regulations, a data subject has the right to request that Lexsolve corrects or deletes personal information in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully. Furthermore, a data subject may request the destruction or deletion of a record of personal information that the Company is no longer authorised to retain under Section 14 of the Act. Upon receipt of such a request, which must be submitted on the prescribed Form 2, the Company will take all reasonable steps to confirm the data subject's identity before correcting, deleting, or destroying the information as requested, or providing the data subject with evidence in support of the information if no agreement can be reached. Where a correction or deletion has a material impact on the data subject's profile, Lexsolve will, where reasonably practicable, notify any third parties to whom the information has been disclosed of these changes.

### **Issued by**

**Luttie Jacobs – Information Officer  
Director**