



EthicSuite™

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VERSION 2.2 · FINAL

Data Protection / POPIA Policy

How EthicSuite lawfully processes personal information

Document ID	ES-POL-003
Version	2.2
Status	Final
Classification	Internal
Policy owner	Information Officer
Approved by	Justin Veeran, Chief Executive Officer, on behalf of the Board of Directors of Ethics Helpdesk (Pty) Ltd
Policy period	28 February 2026 – 1 March 2027
Effective date	28 February 2026
Next review	1 March 2027

Approval

Signature	
Name	Justin Veeran
Title	Chief Executive Officer, Ethics Helpdesk (Pty) Ltd
Date	28 February 2026

Version history

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2.2	28 February 2026	Current issue, valid 28 February 2026 – 1 March 2027

1. Purpose

This policy describes how EthicSuite processes personal information in line with the Protection of Personal Information Act 4 of 2013 (POPIA), the POPIA Regulations (as amended in 2025), the Promotion of Access to Information Act 2 of 2000 (PAIA) and, where applicable, other data protection laws such as the GDPR for tenants operating outside South Africa.

2. Scope

This policy applies to all personal information processed by or on behalf of EthicSuite, including information about tenants' employees, reporters and whistle-blowers, persons named in reports, witnesses, EthicSuite personnel, prospects and suppliers.

3. EthicSuite's Role under POPIA

Role	When it applies
Operator (processing on the tenant's behalf)	For case, report and investigation data in the platform. The tenant is the responsible party and decides why and how the data is processed. EthicSuite only processes it on the tenant's documented instructions under a written operator agreement (POPIA sections 20 and 21).
Responsible party	For EthicSuite's own data: its employees, tenant account contacts, billing, marketing, website visitors and suppliers.

4. Conditions for Lawful Processing

EthicSuite applies the eight POPIA conditions to all processing:

Condition	How EthicSuite meets it
Accountability	Information Officer appointed; this policy and supporting procedures in place; compliance monitored.
Processing limitation	Only the minimum data needed is collected; each processing activity has a lawful basis (see section 5).
Purpose specification	Purposes are recorded in the processing register; retention is limited under the Data Retention Policy.
Further processing limitation	Data is not reused for unrelated purposes (including AI training) without a lawful basis and tenant agreement.
Information quality	Data subjects and tenants can correct data; case records keep a full change history.
Openness	Privacy notice and PAIA manual published; processing register maintained.
Security safeguards	Controls set out in the Information Security Policy (ES-POL-001).
Data subject participation	Rights handled as set out in section 9.

5. Lawful Basis for Processing

The lawful basis for each main processing activity is:

Processing activity	Lawful basis (POPIA section 11)
Ethics reports, case management and investigations (as operator)	The tenant's lawful basis — typically compliance with a legal obligation (s11(1)(c), e.g. Companies Act s159 and the Protected Disclosures Act) or the tenant's legitimate interest (s11(1)(f)). Defined in each tenant agreement.
Tenant account set-up and service delivery	Performance of a contract (s11(1)(b))
Billing and financial records	Contract (s11(1)(b)) and legal obligation (s11(1)(c)), e.g. tax law
Security logging and fraud prevention	Legitimate interest (s11(1)(f))
Direct marketing	Consent (s69), or existing-customer exception for similar services with an opt-out
EthicSuite employee records	Contract and legal obligation (employment and tax law)

6. Special Personal Information and Children

Ethics reports can contain special personal information (for example health information or alleged criminal behaviour) or information about children. This information is processed only where an authorisation in POPIA sections 27 to 35 applies, is classified as Restricted, and is limited to what the investigation genuinely needs.

7. Reporter Confidentiality and Anonymity

- Reporters may report anonymously. EthicSuite does not attempt to identify anonymous reporters and designs its channels so that identifying data (such as IP addresses) is not recorded.
- A reporter's identity is never disclosed to the tenant or anyone else without the reporter's consent, unless required by law.
- Where a person named in a report asks for access to their information, EthicSuite (or the tenant) may refuse or redact information that would reveal the reporter, using the grounds available under POPIA section 23 and PAIA.
- Protections under the Protected Disclosures Act 26 of 2000 are respected at all times.

8. Privacy by Design and Privacy Impact Assessments

Privacy is built into the design of the platform and set to the most protective option by default. A privacy impact assessment (PIA) is completed and approved by the Information Officer before:

- launching a feature that processes Restricted or special personal information;
- onboarding a new sub-processor;
- any new cross-border transfer;
- introducing AI or automated decision-making that affects individuals.

9. Data Subject Rights

Data subjects may request access to (s23), correction or deletion of (s24) their personal information, and may object to processing (s11(3)), subject to legal exceptions including reporter anonymity protections. Requests are handled as follows:

Step	Timeframe
Acknowledge receipt of request	Within 5 working days
Where EthicSuite is operator — forward to the tenant (responsible party)	Within 2 working days
Respond in full (where EthicSuite is responsible party)	Within 30 days, in line with PAIA and the 2025 POPIA Regulations (Forms 1 and 2)

Objections to processing are free of charge. The identity of the requester is verified before any information is released.

10. Operators and Sub-processors

EthicSuite only uses sub-processors that provide sufficient security and privacy guarantees, under written contracts that meet POPIA sections 20 and 21. Tenants receive 30 days' notice of new sub-processors and may object.

11. Cross-Border Transfers

Platform data is hosted with established cloud service providers under written operator agreements. Where personal information is transferred outside South Africa, this is done only under POPIA section 72, using a written data transfer agreement with protections substantially similar to POPIA (s72(1)(a)) for every foreign recipient, supported by an up-to-date transfer register; data subject consent is only used where no other mechanism applies.

12. Security Safeguards

EthicSuite secures personal information in line with POPIA section 19 through the measures set out in the Information Security Policy (ES-POL-001) and Access Control Policy (ES-POL-002).

13. Breach Notification

POPIA has no minimum threshold: every security compromise involving personal information must be reported.

- **As operator** — EthicSuite notifies affected tenants without undue delay and within 24 hours of having reasonable grounds to believe their personal information has been compromised (s21(2)).
- **As responsible party** — EthicSuite notifies the Information Regulator through its eServices portal (mandatory since 1 April 2025) as soon as reasonably possible, with a target of 72 hours of discovery, and affected data subjects as soon as reasonably possible (s22).
- Notifications to data subjects include the possible consequences, the measures taken, recommended protective steps and, if known, the identity of the unauthorised person.

Full procedures are in the Incident Response Policy (ES-POL-005).

14. Data Retention

Personal information is retained only as long as needed for its purpose or as required by law (s14). Retention periods by data category are set out in the Data Retention Policy (ES-POL-004).

15. Direct Marketing

Electronic direct marketing is sent only with consent or to existing customers for similar services, as permitted by POPIA section 69. Every message includes a free and easy way to opt out.

16. Training and Awareness

All personnel complete POPIA training on joining and annually. Staff handling Restricted data receive additional training on reporter confidentiality.

17. Information Officer and Complaints

Enquiries and complaints regarding this policy may be directed to EthicSuite's Information Officer, Justin Veeran (Chief Executive Officer), using the contact details published on the EthicSuite website.

If a data subject is not satisfied with EthicSuite's response, they may complain to the Information Regulator (South Africa) — www.inforegulator.org.za.

EthicSuite's PAIA Manual (ES-POL-006) is available on the EthicSuite website.

18. Monitoring and Review

The Information Officer reports on POPIA compliance, data subject requests and breaches to the Board quarterly. This policy is reviewed at least annually or following a material change in law or processing.