

POLICY

Privacy policy

REFERENCE	REVISION	DATE	APPROVED
RCL-P-2026-002	A	16 October 2026	Renier Cloete

1 Purpose

This policy says what personal information we collect, why, who we share it with, how long we keep it, and what your rights are. It applies to everyone whose information we hold: visitors to our website and people who contact us, our clients and the people we deal with at their organisations, our employees, our suppliers and subcontractors, and the people who use our software. We handle personal information in line with the Protection of Personal Information Act, 2013 (POPIA).

2 Who we are

RCL Consulting (Pty) Ltd, registration 2015/039468/07, 321 Olivier Street, Brooklyn, Pretoria 0181, South Africa. We are the responsible party for the information in this policy.

Our Information Officer is Renier Cloete, registered with the Information Regulator. You can reach him at info@rcl.co.za or +27 82 454 2594.

3 What we collect

When you visit our website. Our host keeps standard web server logs: your IP address, the pages you requested and the time. We use them for security, for troubleshooting and for visitor counts from the logs. The website sets no cookies, uses no analytics or tracking services, and loads nothing from other websites.

When you contact us. The details you give us in the contact form or an email: your name, company, email address, what you are interested in and your message. We also keep the IP address the form was sent from, to limit abuse.

When you are our client. The names, roles and contact details of the people we work with at your organisation, the details we need to invoice you (company name, address and VAT number), and our correspondence. Project material, such as drawings, reports and site records, can contain personal information about other people, for example names on drawings and site contacts. We receive it from you or from others working on the project.

When you work for us. Your name, identity number, contact details and address, your tax number and the bank details we pay you into, your qualifications, your employment contract, and records of your pay and leave. We collect them from you, and keep them for as long as the law requires (see section 9).

When you supply us. The names and contact details of the people we deal with, and the banking details we need to pay you.

When you use our software. Our software does not send us any information, and downloading it from our website needs no account or registration. If you ask us for support, we hold what you send us, as for any other enquiry.

4

Why we use it

- To answer your enquiry, and to deliver and invoice our work.
- To employ and pay our staff.
- To pay our suppliers and subcontractors.
- To keep the records that tax, company and employment law require.
- To keep our website and systems secure.

We do not sell personal information, and we do not use it for any other purpose without telling you first.

5 Whether you must give it

Giving us your information is voluntary. Without your name and an email address we cannot reply to an enquiry, and without your invoicing or banking details we cannot invoice you or pay you. Tax law requires your company name, address and VAT number on our tax invoices.

6 Who we share it with

- **Our hosting providers.** Our website and email are hosted by Cool Ideas and Diamatrix, on servers in South Africa. Your enquiries and our correspondence are stored there.
- **AI tools, only with a client's consent.** We put a client's project information into an AI tool only with that client's written consent, given for the project, as our policy on the use of artificial intelligence sets out. That information goes to Anthropic, in the United States (see section 7).
- **Others working on a project.** We share project information with the client's other consultants, contractors and authorities as the project needs, and as the client agrees.
- **Where the law requires it.** For example, with the South African Revenue Service or our auditors, and, for our employees, with the Unemployment Insurance Fund and the Compensation Fund.

We do not share your information with anyone else.

7 Information sent outside South Africa

We keep personal information in South Africa, with one exception: the project information of a client who has consented in writing to our using AI tools on the project. That information goes to Anthropic in the United States, under Anthropic's commercial terms, under which Anthropic does not train its models on what we send and keeps it for 30 days. Those terms include a data processing agreement that binds Anthropic to protect personal information. We send nothing else outside South Africa.

Before project material goes into an AI tool, we remove the names and contact details of people that the work does not need.

8 How we keep it safe

- Only the people working on a project have access to its information.
- We protect our computers and accounts with passwords and keep their software up to date.
- We bind the suppliers who hold information for us to keep it confidential.

If we believe someone has had unauthorised access to your personal information, we will tell you and the Information Regulator as soon as reasonably possible, as POPIA requires. We will say what happened, what it could mean for you, what we are doing about it, and what you can do to protect yourself.

9 How long we keep it

INFORMATION	HOW LONG WE KEEP IT
Web server logs	As long as our host keeps them for security and troubleshooting
Enquiries that do not lead to work	12 months after our last contact
Client, supplier and project records	As long as tax and company law require, normally five to seven years after the work ends
Employee records	As long as tax and employment law require, normally five years after employment ends

After that we delete it, unless a law or a legal claim requires us to keep it longer.

10 Marketing

We do not send marketing emails to people who have not asked for them. If we write to a client about our services, every message tells you how to stop them, and we stop when you ask.

11 Your rights

You can:

- ask whether we hold personal information about you, and for a copy of it;

- ask us to correct or delete information that is wrong, out of date or no longer needed;
- object to how we use it;
- withdraw consent you have given, without affecting what we did before you withdrew it.

Write to our Information Officer at info@rcl.co.za. We will answer within 30 days. We may ask you to prove who you are before we give you any information.

12 Complaints

If you are not satisfied with our answer, you can complain to the Information Regulator (South Africa): Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg 2191; POPIAComplaints@inforegulator.org.za; 010 023 5200; inforegulator.org.za.

13 Review

We review this policy every year, and sooner when what we collect, our suppliers or the law change.