



PHAMBANE GROUP HOLDINGS

GROUP HOLDINGS

Privacy Policy

DATA PROTECTION & PRIVACY COMPLIANCE — POPIA & GDPR

Document Version	Effective Date	Next Review
1.0	11 JUNE 2026	11 JUNE 2027
Registered Company:	PHAMBANE GROUP HOLDINGS (Pty) Ltd	
Registration Number:	2025 / 859890 / 07	
Tax Reference:	9881286190	
Directors:	A.M. Phambane & A.K.C. Phambane	
Address:	House No 1336, Section B, Nkhesani Street, Nkowankowa, Tzaneen, Limpopo, 087	
Email:	info@phambanegroupholdingsptyltd.co.za	
Website:	www.phambanegroupholdingsptyltd.co.za	
Trading As:	Phambane Nexus	

■ **CONFIDENTIAL DOCUMENT** — This document contains proprietary and confidential information of Phambane Group Holdings Pty Ltd. Unauthorised disclosure, reproduction, or distribution is strictly prohibited. Subject to applicable South African law.



Phambane Group Holdings (Pty) Ltd ("**we**", "**us**", or "**our**") is committed to protecting the privacy and personal information of all individuals with whom we interact. This Privacy Policy describes how we collect, use, store, and protect personal information in accordance with the **Protection of Personal Information Act, No. 4 of 2013 (POPIA)** and, where applicable, the **EU General Data Protection Regulation (GDPR)**.

This Privacy Policy applies to: (a) clients and prospective clients; (b) contractors and service providers; (c) website visitors; (d) any other individuals whose personal information we process.

1. INFORMATION WE COLLECT

1.1 **Personal Information** we may collect includes: name, identity number / passport number, contact details (email, phone, address), date of birth, financial information, employment details, IP addresses, browser information, and any other information voluntarily provided by you.

1.2 **Special Personal Information:** We do not collect special personal information (e.g., race, religion, health, biometric) without your explicit consent or as permitted by law.

1.3 **How We Collect Information:** Directly from you (forms, emails, meetings); from publicly available sources; automatically through our website (cookies, analytics); and from third parties with your consent.

2. PURPOSE AND LAWFUL BASIS FOR PROCESSING

2.1 We process personal information for the following purposes: (a) providing and managing our services; (b) invoicing and payment processing; (c) communicating with you; (d) legal and regulatory compliance; (e) improving our services; (f) marketing (with your consent).

2.2 **Lawful Basis:** Our lawful basis for processing includes: (a) consent; (b) performance of a contract; (c) compliance with a legal obligation; (d) legitimate interests (balanced against your rights).

2.3 **For EU/EEA Data Subjects (GDPR):** We process personal data under the following lawful bases: consent (Article 6(1)(a)); contract performance (Article 6(1)(b)); legal obligation (Article 6(1)(c)); legitimate interests (Article 6(1)(f)).

3. USE OF AI SYSTEMS AND AUTOMATED DECISION-MAKING

3.1 Where we use AI systems in the provision of services, we will inform you if automated decision-making significantly affects you.

3.2 You have the right to request human review of automated decisions and to express your point of view.

4. DATA SHARING AND TRANSFERS

4.1 We do not sell your personal information.



4.2 We may share personal information with: (a) service providers (operators) who process data on our behalf under strict confidentiality; (b) legal and regulatory authorities where required; (c) payment processors for financial transactions.

4.3 **International Transfers (GDPR):** Where personal data is transferred outside the EEA, we ensure adequate safeguards are in place, such as Standard Contractual Clauses (SCCs) or adequacy decisions.

4.4 Personal data processed by Phambane Group Holdings may be transferred internationally where our AI systems or cloud infrastructure are hosted abroad. Such transfers comply with applicable data protection laws.

5. DATA SECURITY

5.1 We implement appropriate technical and organisational security measures to protect personal information against unauthorised access, loss, or destruction, including: encryption, access controls, regular security assessments, and staff training.

5.2 In the event of a data breach, we will notify the Information Regulator (South Africa) and affected data subjects within **72 hours** where required by POPIA, and within **72 hours** under GDPR.

6. DATA RETENTION

6.1 We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting requirements.

6.2 Retention periods are governed by our Data Retention Policy. Generally, records are retained for a minimum of **5 years** in accordance with South African tax and company law requirements.

6.3 Upon expiry of the retention period, personal information is securely destroyed or anonymised.

7. YOUR RIGHTS

7.1 Under POPIA and GDPR, you have the right to: (a) access your personal information; (b) correct inaccurate information; (c) delete your information ("right to be forgotten"); (d) restrict processing; (e) data portability; (f) object to processing; (g) withdraw consent.

7.2 To exercise any of these rights, please contact us at **info@phambanegroupholdingsptyltd.co.za**. We will respond within **30 days**.

7.3 You have the right to lodge a complaint with the Information Regulator (South Africa) at **inforeg@justice.gov.za** or, for EU data subjects, the relevant supervisory authority.

8. USE OF COOKIES

8.1 Our website uses cookies and similar technologies. Please refer to our Cookie Policy for full details.



8.2 We use essential cookies (required for the website to function), analytics cookies (to understand how visitors use our site), and marketing cookies (with your consent).

9. CHANGES TO THIS POLICY

9.1 We may update this Privacy Policy from time to time. The updated version will be published on our website with the effective date clearly indicated.

9.2 Material changes will be communicated to you via email where you have provided consent for communications.

10. CONTACT US

10.1 For any questions regarding this Privacy Policy or to exercise your data protection rights, please contact:

Information Officer: Phambane Group Holdings (Pty) Ltd

Email: info@phambanegroupholdingsptyltd.co.za

Address: House No 1336, Section B, Nkhesani Street, Nkowankowa, Tzaneen, Limpopo, 0870

10.2 Our Information Officer is registered with the Information Regulator as required by POPIA.