

PRIVACY POLICY

As soon as you visit our website <https://www.transparent-insights.com>, submit a contact form or application form, use our services or otherwise interact with us, we receive personal data about you. In order to contact you, evaluate applications or provide our services to you, we need to process that personal data. This privacy policy applies to all personal data we process, including personal data we process through our website, contact forms, email, recruitment tools such as Microsoft Forms and other communication channels, as well as data processed in the context of delivering our services.

We believe it is important to treat your personal data carefully and securely. We process your personal data only in accordance with the General Data Protection Regulation (GDPR) of the European Union, and in terms of the Protection of Personal Information Act 4 of 2013 (POPIA) of South Africa, to the extent that it applies. In this privacy policy, we explain how we handle your data, why we collect it and what your rights are.

1. What personal data do we process?

Depending on the nature of our interaction with you, we may process the following personal data:

- First and last name;
- Email address;
- Telephone number;
- Date of birth;
- Country of citizenship;
- Information submitted via contact or application forms;
- Any other you voluntarily provide during communication or our services.

We do not use your personal data for automated decision-making or profiling.

Our services and website are not intended for individuals under the age of 18. We do not knowingly collect personal data from minors without appropriate consent.

If you are under 18 years of age, you may only use our website or submit personal data with the explicit consent of a parent or legal guardian. By using our website or providing personal data, you confirm that you have obtained such permission. If we discover that we have inadvertently collected personal data from a minor without appropriate consent, we will delete this information as soon as possible.

2. Why do we use your personal data?

We only use your personal data for the following purposes:

- to provide our services to you, in accordance with any agreement we may have entered;
- to contact you about our services;
- to respond to your questions, requests or contact form submissions, and to provide quotations or relevant information;
- to process payments and send invoices;
- to continuously evaluate and improve the quality, security and functionality of our services;
- to assess and process job applications, including those submitted via our website or recruitment tools;
- to comply with applicable legal obligations, such as those related to tax, accounting or data protection regulations.

3. What is the legal basis for processing your data?

We process your personal data only when we have a valid legal basis under Article 6 of the GDPR, and section 11 of POPIA, where applicable. Depending on the specific context, we rely on one or more of the following legal grounds:

- Performance of a contract: when the processing is necessary to enter or fulfil an agreement with you, for example to provide our services;
- Consent: when you have explicitly given us permission, such as when you submit a contact or application form and we follow up with you;
- Legal obligation: when we need to process your data to comply with statutory duties, for example in the context of tax or financial regulations;
- Legitimate interest: when the processing is necessary for our legitimate business interests, such as improving our services, ensuring security or maintaining effective communication, provided that your rights and interests do not outweigh those interests.

4. Who do we share your personal data with?

We do not share your personal data with third parties unless you explicitly consent, or unless it is necessary for providing our services or complying with legal obligations. For instance, we may engage third parties such as:

- IT service providers, including platforms like Microsoft Forms which we use to collect and manage candidate or contact data;
- Government authorities or regulators if we are legally required to disclose certain information.

Any third party we engage will be carefully selected and bound by appropriate agreements. If a third party processes personal data on our behalf, we will enter into a Data Processing Agreement (DPA) to ensure that your data is handled securely and in accordance with the GDPR, or POPIA where applicable. If a third party acts as an independent data controller, they are fully responsible for their own compliance with the GDPR, or POPIA where applicable.

5. How long do we retain your personal data?

We retain your personal data no longer than necessary for the purpose for which it was collected, unless we are legally required to keep it longer. For example, if you are a customer with us, we store your data according to the statutory retention period of seven years. In general, personal data will not be retained longer than seven years after the termination of our business relationship.

If the processing of your data was based on consent and you choose to withdraw that consent, we will delete the associated personal data unless we are under a legal obligation to retain it.

6. Where is your personal data stored?

Your personal data is stored and processed exclusively within the European Economic Area, or if you are a South African resident and POPIA applies, it may be stored within South Africa. We make use of Microsoft 365 environments to manage and safeguard data. These environments comply with strict security standards and are configured to align with the GDPR, and POPIA where applicable.

7. How do we protect your personal data?

We take both technical and organisational measures to protect your personal data against misuse, loss, unauthorised access or disclosure. Our systems and communication channels are protected in accordance with recognised information security standards. Specific measures include:

- Role-based access controls, so that only authorised personnel can access personal data;
- The use of secure cloud environments (e.g. Microsoft 365), compliant with the GDPR, and POPIA where applicable.

If you would like to know more about the specific security measures we apply, feel free to contact us.

8. What are your rights?

Because we use your personal data, you have various rights under the GDPR, or POPIA where applicable. We have listed these rights for you below.

- Right to information and access

You have the right to request information about whether or not we process your personal data, and to access that data.

- Right to correction

If your personal data is incorrect or incomplete, you may ask us to correct or complete it.

- Right to object

You may object to the processing of your data, for instance if you believe your personal situation outweighs our interest in processing it or if it is used for direct marketing.

- Right to data portability

You may request to receive your personal data in a structured, commonly used and machine-readable format or to transmit it to another data controller.

- Right to restriction

You may ask to limit the processing of your personal data.

- Right to be forgotten

You may ask us to delete all personal data we have about you, provided there is no legal obligation for us to retain it.

- Right to withdraw consent

If we process your data based on your consent, you may withdraw this consent at any time.

To exercise any of your rights under the GDPR, or POPIA as the case may be, please send us a written request using the contact details provided below.

In order to protect your privacy and prevent misuse, we may ask you to verify your identity. In that case, we will ask you to provide a copy of a valid identity document, with your photo and citizen service number (BSN) redacted.

We aim to process every request or complaint within one (1) month. If you submit multiple or complex requests, it may take longer. In such cases, we will notify you within three (3) months and explain the reason for the delay.

Please note that we may not always be able to fulfil your request. For example, we might be legally required to keep certain information, or there may be other important reasons why we cannot (fully) comply. If that happens, we will let you know why in our response.

9. Failure to provide information

Where provision and collection of data is authorised or mandated by law, we will generally indicate under which law it is so authorised or required.

Whether or not the provision or collection of data is voluntary or authorised or mandated, failure to provide information may result in us not being able to engage with you, start a business relationship with you, provide or perform any services, or contract with you.

10. Questions or complaints

If you have any questions about how we process your personal data or if you are dissatisfied with our handling of your personal data, please contact us via info@transparent-insights.com. We will do our best to resolve the matter with you.

If you are not satisfied with our response, you have the right to submit your complaint to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) via www.autoriteitpersoonsgegevens.nl.

11. Relevant parties and contact information

For engagement with Transparaet.in, the relevant party and contact details are as follows:

Transparent Insights
Fred. Roeskestraat 115
1076 EE AMSTERDAM
Chamber of Commerce number 78417902
info@transparent-insights.com

For engagement with [SA Company], and where POPIA applies, the relevant party and contact details are as follows:

TRANSPARENT INSIGHTS (PTY) LTD
Registration number - 2025/784984/07
1st Floor, Century Way, The Colosseum,
Cape Town,
7441, South Africa
info@transparent-insights.com

11. Which cookies do we use?

We use non-functional analytical cookies on our website to analyse visitor behaviour and improve website performance. These cookies are not essential and are only placed with your explicit consent.

In accordance with the GDPR and Dutch Telecommunications Act, you can manage or withdraw your consent at any time via the cookie banner or your browser settings.

If we expand our use of cookies in the future—for example, for personalised content or marketing—we will update this privacy policy accordingly.

12. Changes to this privacy policy

We may amend this privacy policy if necessary. We recommend that you regularly review this privacy policy so that you are aware of these changes. This version of the privacy policy is effective as of April 2025.