

Privacy, POPIA and Data Handling Policy

Customer and Company Data | Ratch Tech (Pty) Ltd | Effective 26 October 2026

This policy explains how Ratch Tech handles personal information, customer-company information and data in its software, SaaS, hosting, consulting and industrial-monitoring services. It is intended as a public privacy notice and statement of data-handling principles. Actual hosting locations, named providers and detailed service retention settings must be confirmed in the relevant service documentation before any contrary or more specific claim is made.

1. Who is responsible and how to contact us

The organisation is **Ratch Tech (Pty) Ltd**, registration **2025/242708/07**, with registered and business address **4 Birmingham Road, Plumstead, 7801, Cape Town, South Africa**. Directors are **Warren Fletcher and Simon Raw**. Privacy and information requests may be sent to **support@ratchtech.com** or made by telephone at **+27 78 004 3426**. Website: **www.ratchtech.com**. The nominated and registered Information Officer's individual details, if required to be separately disclosed, should be made available through this contact once formally confirmed.

2. Meaning of company data and personal information

POPIA (the Protection of Personal Information Act 4 of 2013) protects information about identifiable living natural persons and, where applicable, identifiable existing juristic persons. Therefore, a company name, account identifiers, contact details, business correspondence and other information identifying a business may fall within POPIA. Other operational information, such as anonymous equipment readings, may not be "personal information" unless it identifies a person or company; it may nonetheless be confidential customer information protected by contract and security controls.

For this policy, "**Customer Data**" includes documents, account information, software configurations, device identifiers, plant or equipment measurements, process telemetry, logs, alarms, backups and other material provided to, stored in or generated by the agreed service. "**Personal Information**" has its POPIA meaning. Ratch Tech does not acquire ownership of customer-provided data merely by hosting or processing it.

3. Our POPIA roles

Ratch Tech is generally the **responsible party** for the information needed to run its own business: website enquiries, customer contacts, accounts, quotations, contracts, invoices, service communications and marketing decisions. For hosted applications or customer-controlled systems where a business customer determines the purposes and means of processing personal information, Ratch Tech may act as an **operator** on that customer's instructions. The exact allocation of responsibilities depends on the particular system and contract. Where required, a written DPA will describe instructions, security responsibilities, confidentiality, subprocessors, incident reporting and end-of-service data handling.

4. Categories of information we may process

Depending on the service actually used, categories may include: (a) business identity and registration details; (b) names, titles, addresses, emails and telephone numbers of customers, employees, authorised users and suppliers; (c) quotations, orders, subscriptions, invoices, payment references and payment status; (d) account identifiers, authentication records and permissions; (e) support communications, incident reports and diagnostic logs; (f) device, sensor, controller, equipment and site identifiers; (g) time-stamped telemetry, status values, configuration information, alerts and usage records; and (h) technical and administrative records needed for lawful service operation. We should not request special-category personal information unless a defined lawful purpose and additional legal safeguards justify it.

5. Where information comes from

Information may be obtained directly from a customer, an authorised representative, a website or service form, an accepted order or agreement, a support interaction, an authorised device or integration, or a customer-controlled system. Information may also come from lawful payment or service providers and public corporate registers where relevant to contracting and fraud prevention. The precise sources depend on the transaction. We will provide an appropriate collection notice when required by section 18 of POPIA, including consequences of withholding information where relevant.

6. Purposes and lawful grounds for processing

We process information only for specified, lawful and appropriate purposes, which may include responding to enquiries; preparing quotations; creating and administering accounts; delivering licences, goods and professional services; operating hosted services and technical integrations; issuing invoices and recording payments; handling subscriptions, refunds and support; detecting fraud or security incidents; complying with legal, tax and recordkeeping duties; and communicating service changes. Processing must be justified by a ground recognised in section 11 of POPIA, such as consent, contractual necessity, a legal obligation, protection of a legitimate interest of the data subject, or another lawful basis. Consent is not the only possible basis; when consent is used, applicable withdrawal rights are respected.

7. How company and customer data is processed

For each service, data handling follows the functional stages reasonably needed for that service: **collection or ingestion, validation and normalisation, transmission to authorised service components, storage or short-term buffering where configured, access by authorised users or support personnel, display, reporting or export, backup or disaster recovery where included, and deletion or return at the end of the applicable period.** Industrial telemetry may be aggregated, trended or used to trigger notifications if those functions are enabled by the customer. Processing of personal information in customer-controlled workloads is limited to the customer's documented instructions, applicable law and the contract.

8. Data storage location and hosting providers

Information may be stored on customer-managed systems, Ratch Tech-managed infrastructure or contracted third-party hosting and software platforms, depending on the service selected. **No single cloud provider, datacentre or country of storage is asserted by this general policy:** these must be identified for the relevant service or in its DPA/technical schedule where necessary. If personal information is transferred from South Africa to a recipient in another country, we will assess and implement an applicable condition under **section 72 of POPIA**, including legally adequate safeguards, a recognised contractual necessity or valid consent where appropriate. Customers should receive service-specific information about material hosting regions and subprocessors when it is relevant to informed decisions.

9. Information security standards

Ratch Tech's data-handling standard is to assess reasonably foreseeable confidentiality, integrity and availability risks and apply security safeguards appropriate to the information and system, as required by POPIA section 19. Depending on the applicable service and its implementation, controls may include role-based access, strong authentication, secure transport, protection of secrets, operating-system and application updates, logging, backup and recovery procedures, least-privilege support access, administrative review and incident response. The exact controls and any encryption-at-rest, backup interval, recovery objective or certification must be documented and verified in the applicable security schedule; they are not implied by this public policy alone. Access to customer data for support must be restricted to legitimate authorised purposes.

10. Service providers and operators

We may use contracted providers for payment processing, website or application hosting, notifications, helpdesk functions, analytics where configured, and technical infrastructure. They should receive only the information reasonably necessary for their work. When acting as the responsible party, Ratch Tech will seek the **written contracts and safeguards required by POPIA section 21** for operators processing personal information on its behalf, including confidentiality, appropriate security and reporting of suspected unauthorised access. When acting as a customer's operator, we will follow the applicable authorisation and subcontracting restrictions agreed with that customer. A service-specific list of subprocessors and jurisdictions should be made available where relevant.

11. Disclosure and sharing

We may disclose information to authorised personnel, service providers, professional advisers, auditors, payment processors and public authorities where justified by the agreed service, legitimate needs or the law. We will not sell customer content or use it for unrelated third-party commercial purposes without an appropriate legal basis and authorisation. Public disclosures, regulator requests and compulsory legal process are assessed under applicable law. We do not claim that payment card details are stored or never stored by Ratch Tech without verifying the actual checkout architecture; specific payment handling is described by the provider and checkout notice.

12. Retention, deletion and backups

Personal information is retained no longer than necessary for the purpose collected or as otherwise permitted or required by POPIA section 14, law, contract or a defensible legitimate need. Relevant factors include current service access, tax and financial record requirements, contractual disputes, security investigations and any agreed backup cycle. At termination, data may be returned, exported, restricted, anonymised or securely deleted according to the service agreement and applicable law. Backup deletion may occur at the end of the documented backup lifecycle, subject to legal holds and recoverability limits. **Specific retention durations for invoices, operational telemetry, logs, account records and backups must be set in an internal retention schedule and, where material, the service order or DPA;** this policy does not invent a uniform number of days.

13. Accuracy and minimisation

We seek to collect information relevant to an identified purpose, avoid unnecessary duplication and keep it reasonably accurate where accuracy matters. Account holders should update inaccurate contact or company details promptly. Customers controlling uploaded datasets remain responsible for the lawfulness and accuracy of source material, subject to Ratch Tech's applicable duties as an operator. Aggregated or de-identified data will be handled with safeguards appropriate to any remaining risk of re-identification.

14. Data subject rights and requests

Subject to POPIA and other applicable laws, affected natural persons and qualifying juristic persons may request confirmation of whether we hold personal information, seek access to records, request correction or deletion where legally available, object to certain processing, and withdraw consent where processing relies on it. We may need to verify identity or authority before releasing data and may lawfully decline or limit a request under an applicable exemption or retention obligation. Send requests to support@ratchtech.com with a sufficient description; requests involving a customer-controlled dataset may need to be directed to that customer's responsible party, with our assistance where required.

15. Direct marketing, cookies and website technology

Electronic direct marketing will be conducted in accordance with POPIA section 69 and any applicable consent, existing-customer and opt-out requirements. Transactional notices needed to perform an agreement are distinct from optional marketing. Our website and applications may use essential session technology and, if actually enabled, non-essential analytics or similar tools. Before publishing a final cookie disclosure, Ratch Tech must confirm the technologies in use, their purposes, providers, lifetimes and any applicable consent choices. Users may contact us for information or to exercise applicable marketing objections.

16. Security incidents and notification

We will maintain a procedure to identify, assess, contain and document suspected unauthorised access to personal information. Where there are reasonable grounds to believe personal information has been accessed or acquired by an unauthorised person, we will notify the **Information Regulator and affected data subjects** as required by section 22 of POPIA, as soon as reasonably possible after discovery, subject to lawful investigation and notification exceptions. Where Ratch Tech is only an operator, it will promptly notify the relevant responsible party in accordance with POPIA and the applicable written agreement. There is no universal 72-hour statutory POPIA notification deadline stated here.

17. Data involving children or special personal information

Our ordinary business offerings are not intended to require special personal information or children's personal information. If a project genuinely requires such data, it must be specifically assessed before collection, and any additional POPIA permissions, safeguards or prior authorisation requirements must be addressed. Customers must not upload sensitive or regulated datasets outside the agreed service scope without proper authorisation.

18. Client systems, operational data and confidentiality

Industrial telemetry and equipment logs can reveal commercially sensitive processes even if no individual is identifiable. Such data is therefore treated as customer-confidential information under the applicable agreement. Support, engineering and monitoring access should be limited to authorised personnel and justified troubleshooting or service functions. Telemetry retention, remote access, export controls, logging, failover arrangements and location of processing should be stated in the relevant technical schedule or SLA. This privacy policy is not a substitute for a negotiated industrial confidentiality agreement or customer-specific DPA.

19. International services and cross-border arrangements

Where customers, users or service providers are outside South Africa, additional data protection or sector requirements may apply. Ratch Tech will address applicable obligations in the relevant engagement. This general policy does not imply that data always remains within South Africa or that all services currently involve an international transfer. Any actual transfer of personal information abroad must satisfy section 72 POPIA and any additional contractual restrictions.

20. Information Officer, governance and PAIA

Ratch Tech must identify and register its Information Officer in accordance with applicable POPIA requirements, maintain an appropriate privacy compliance framework, assess its processing activities and security risks, and prepare and make available a PAIA manual where required. The final officer name, registered status, manual location, service provider inventory and operational control evidence should be verified internally. Until a named officer is separately published, requests may be directed to support@ratchtech.com for routing to the responsible person.

21. Complaints to the Information Regulator

Please first contact Ratch Tech at support@ratchtech.com with the concern and relevant context. A person who believes POPIA has been breached may complain to the **Information Regulator (South Africa)** at www.inforegulator.org.za or POPIAComplaints@inforegulator.org.za. General Regulator enquiries: enquiries@inforegulator.org.za or 010 023 5200. This procedure does not limit a person's lawful rights or remedies.

22. Revisions and contact details

We may update this document as services, data practices or the law change. We will publish a revised effective date and give any additional notice required for material changes in processing. Ratch Tech will not rely on a revised notice to make previously unlawful processing lawful. Contact: **Ratch Tech (Pty) Ltd**, registration **2025/242708/07**, **4 Birmingham Road, Plumstead, 7801, Cape Town, South Africa**; support@ratchtech.com; **+27 78 004 3426**; www.ratchtech.com. Privacy policy location: www.ratchtech.com/privacy-policy. Effective and last updated **26 October 2026**.