

PRIVACY AND DATA PROTECTION POLICY

10-BRAVO (PTY) LTD

Registration Number: 2026/145815/07

Version 1.0 | April 2026

1. INTRODUCTION

This Privacy and Data Protection Policy ("Policy") describes how 10-Bravo (Pty) Ltd (Registration Number: 2026/145815/07) ("10-Bravo", "we", "us", "our") collects, uses, stores, and protects personal information in connection with its operations as an IT managed services provider and through the use of its website at <https://10-bravo.com>.

This Policy is issued in terms of section 18 of the Protection of Personal Information Act 4 of 2013 ("POPIA") and applies to all personal information processed by 10-Bravo as a responsible party, as well as personal information processed by the Company on behalf of its clients as an operator.

By engaging with 10-Bravo, using the Website, or submitting personal information to the Company, you acknowledge that your personal information will be processed in accordance with this Policy.

10-Bravo does not sell personal information to third parties. Personal information is used only for the purposes set out in this Policy.

2. DEFINITIONS

“Data Subject” An identified or identifiable natural person, and where applicable under POPIA, an identifiable existing juristic person, to whom personal information relates.

“Information Officer” The person designated by 10-Bravo in terms of POPIA to ensure compliance with POPIA and to handle PAIA requests. Currently: Jan-Carel Coetzee (dpo@10-bravo.com).

“Operator” A person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of the responsible party. 10-Bravo acts as an operator when processing client data as part of service delivery.

“Personal Information” Information relating to an identifiable natural or juristic person, as defined in section 1 of POPIA, including but not limited to names, contact details, identification numbers, financial information, location data, and online identifiers.

“Processing” Any operation performed on personal information, including collection, recording, storage, update, retrieval, use, disclosure, erasure, or destruction.

“Responsible Party” The entity that determines the purpose and means of processing personal information. 10-Bravo is the responsible party for personal information it processes about its own employees, contractors, and website visitors.

“Special Personal Information” A category of personal information subject to stricter processing conditions under POPIA, including health information, racial or ethnic origin, religious beliefs, political opinions, trade union membership, criminal records, biometric information, and children's information.

“Website” The 10-Bravo website accessible at <https://10-bravo.com> and all associated pages and content.

3. THE INFORMATION OFFICER

10-Bravo has designated an Information Officer and Deputy Information Officer as required by POPIA. The Information Officer is responsible for ensuring the Company's compliance with POPIA and for handling PAIA requests and data subject enquiries.

Information Officer	Jan-Carel Coetzee
Email	dpo@10-bravo.com
Deputy Information Officer	Themba Ndlovu
Website	https://10-bravo.com/legal

4. WHAT PERSONAL INFORMATION WE COLLECT

10-Bravo collects and processes personal information across the following categories of data subject:

Clients and client employees	Names, job titles, contact details, email addresses; IT system access information, device and system data processed in the course of managed services delivery.
Employees and contractors	Full names, identity numbers, contact details, employment history, banking details, tax information, payroll data, leave records, disciplinary records, and performance information.
Prospective clients and leads	Names, business contact details, company name, records of communications, proposals sent, and meeting notes.
Vendors and suppliers	Names, contact details, company registration details, VAT numbers, and banking details.
Website visitors	IP addresses, browser type and version, device type, pages visited, time and duration of visit, referral source, and cookie identifiers. See Section 9 for full cookie details.
Contact form and enquiry submitters	Name, email address, company name, and the content of the enquiry submitted via the Website contact form.

10-Bravo does not knowingly collect or process special personal information except where required by law or with the explicit consent of the data subject. The Company does not knowingly collect personal information from children under the age of 18 without verifiable parental or guardian consent.

5. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information through the following means:

- Directly from data subjects when they contact us, submit an enquiry via the Website, request a quote, enter into a contract, or communicate with us by email, phone, or in person.
- In the course of providing managed IT services, where we access client systems and process information on behalf of the client as an operator.
- Automatically through the Website via cookies, server logs, and analytics tools when a visitor browses the Website. See Section 9.
- From publicly available sources, such as company registers, LinkedIn, and business directories, in connection with business development activities.
- From third parties such as referral partners, resellers, or vendors, where they are authorised to share that information with us.

6. PURPOSES OF PROCESSING AND LAWFUL BASIS

We process personal information only for the purposes set out below, and only where we have a lawful basis to do so under POPIA.

Purpose	Description	Lawful basis
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Service delivery	Providing IT managed services, remote monitoring, helpdesk support, project delivery, and related services to clients.	Contract performance; legitimate interest
Contract management	Administering client, vendor, and contractor agreements, including invoicing, payment, and record-keeping.	Contract performance; legal obligation
Employee administration	Managing employment relationships, payroll, leave, performance, and HR processes.	Contract performance; legal obligation
Legal and regulatory compliance	Meeting obligations under SARS, CIPC, POPIA, PAIA, and other applicable legislation.	Legal obligation
Business development	Sending marketing communications and proposals to prospective clients where consent exists or a legitimate interest applies.	Consent; legitimate interest
Security and monitoring	Monitoring Company systems and client environments for security threats, incidents, and anomalies.	Legitimate interest; contract performance
Website analytics	Understanding how visitors use the Website to improve content and user experience.	Legitimate interest (with opt-out available)
POPIA compliance	Maintaining a processing register, responding to data subject requests, and managing data breach procedures.	Legal obligation

7. DISCLOSURE OF PERSONAL INFORMATION

We do not sell, rent, or trade personal information. We may share personal information with the following categories of recipients, subject to confidentiality and data processing obligations:

- Cloud and SaaS platform providers used in service delivery (including Microsoft 365, remote monitoring and management platforms, and cybersecurity tooling).
- BoldSign (SynCFusion Inc.) as the Company's electronic signature platform, for processing of signatory name, email address, and signature data on executed documents.
- Third-party IT vendors and subcontractors engaged on specific client engagements, under written confidentiality obligations.
- Accounting, payroll, tax, and legal professional service providers, on a need-to-know basis.
- Financial institutions and payment processors in connection with invoicing and payments.
- Regulatory and government authorities where required by law, including SARS, CIPC, the Information Regulator, and the South African Police Service.
- Potential acquirers or investors in the event of a merger, acquisition, or business sale, subject to appropriate confidentiality protections.

All third-party recipients who process personal information on our behalf do so under written data processing agreements and are obligated to implement appropriate security measures.

8. TRANSBORDER FLOWS OF PERSONAL INFORMATION

Certain cloud platforms and service providers used by 10-Bravo process personal information outside the Republic of South Africa. Where such transfers occur, we ensure that:

- The recipient country or recipient organisation provides an adequate level of protection for personal information, substantially equivalent to POPIA.
- A written data processing agreement or equivalent contractual safeguard is in place with the recipient.
- The transfer is otherwise permitted under POPIA section 72.

Platforms currently used that may process data outside South Africa include Microsoft 365 (EU and US datacentres), BoldSign (US), and selected cloud-hosted RMM and security tools. We review these arrangements regularly.

9. COOKIES AND WEBSITE TRACKING

9.1 What cookies are

Cookies are small text files placed on your device when you visit the Website. They allow the Website to recognise your device and remember certain information about your visit.

9.2 Cookies we use

Type	Purpose	Duration	Consent
Strictly necessary	Required for the Website to function. Cannot be disabled. Include session management and security cookies.	Session / persistent	No consent required
Analytics and performance	Help us understand how visitors use the Website (page views, traffic sources, time on page). No personally identifiable information is collected without aggregation.	Persistent (up to 13 months)	Consent required
Functional	Remember your preferences and settings across visits.	Persistent (up to 12 months)	Consent required
Marketing	10-Bravo does not currently use marketing or advertising cookies.	N/A	N/A

9.3 Managing cookies

You can control and delete cookies through your browser settings. Disabling cookies may affect the functionality of the Website. Consent for non-essential cookies may be withdrawn at any time by adjusting your browser settings or using the cookie preference tool on the Website.

10. DATA SECURITY

10-Bravo implements the following technical and organisational security measures to protect personal information:

- Encryption of personal information in transit using TLS and at rest where technically feasible.
- Role-based access controls limiting access to personal information to authorised personnel.
- Multi-factor authentication on all systems that process personal or client information.
- Continuous monitoring and alerting on Company and client environments for security anomalies.
- Vendor due diligence and written data processing agreements with all sub-processors.
- Documented incident response and data breach notification procedures.
- Regular review of access rights, system configurations, and security controls.

In the event of a data breach involving personal information that poses a risk to data subjects, 10-Bravo will notify the Information Regulator and affected data subjects as soon as reasonably possible and in accordance with section 22 of POPIA.

11. RETENTION OF PERSONAL INFORMATION

We retain personal information only for as long as is necessary for the purpose for which it was collected or as required by law. Our retention schedule is set out in full in the Company's PAIA Manual, available at <https://10-bravo.com/legal>. Key periods include:

- Client contract and engagement records: 5 years after termination of the client relationship.

- Financial and accounting records: 7 years (Income Tax Act and SARS requirements).
- Employee records: 3 years after termination of employment.
- Payroll records: 5 years.
- Website usage and analytics data: 13 months.
- Contact form and enquiry records: 2 years from date of submission, or until the enquiry is resolved.

12. YOUR RIGHTS AS A DATA SUBJECT

Under POPIA, you have the following rights in relation to your personal information held by 10-Bravo:

- Right to be notified of the collection and processing of your personal information.
- Right of access: to request what personal information we hold about you.
- Right to correction or deletion: to request that inaccurate, irrelevant, excessive, outdated, or unlawfully obtained personal information be corrected or deleted.
- Right to object: to object to the processing of your personal information, including for direct marketing purposes.
- Right to complain: to lodge a complaint with the Information Regulator at POPIAComplaints@inforegulator.org.za if you believe your personal information has been processed unlawfully.

To exercise any of the above rights, submit a written request to the Information Officer at dpo@10-bravo.com. The Company will respond within 30 calendar days. The procedure for access requests is set out in the PAIA Manual.

13. LINKS TO THIRD-PARTY WEBSITES

The Website may contain links to third-party websites. 10-Bravo is not responsible for the privacy practices or content of those websites and encourages visitors to review the privacy policies of any linked sites before providing personal information.

14. UPDATES TO THIS POLICY

This Policy is reviewed at least annually and updated whenever material changes occur that affect how we process personal information. The current version is published on the Website. Continued use of the Website or the Company's services after an update constitutes acceptance of the revised Policy.

This Policy was first published on 6 April 2026. Current version: Version 1.0 | April 2026.

15. CONTACT US

Company	10-Bravo (Pty) Ltd
Registration number	2026/145815/07
Website	https://10-bravo.com
Information Officer	Jan-Carel Coetzee
Data protection enquiries / POPIA	dpo@10-bravo.com
General enquiries	info@10-bravo.com
Information Regulator (complaints)	POPIAComplaints@inforegulator.org.za