

PRIVACY POLICY

Smilentrepreneurs

Effective Date: January 2026

1. Introduction

Smilentrepreneurs is committed to protecting the privacy and personal information of our clients, website visitors, and all individuals whose data we process. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and other applicable South African legislation.

By engaging our consultancy services, visiting our website, or otherwise providing us with your personal information, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and disclosure of your personal information as described herein.

2. Responsible Party

For purposes of POPIA, Smilentrepreneurs is the responsible party in relation to the personal information we process. Our details are as follows:

Company Name: Smilentrepreneurs

Registration Number: 2017/216161/07

Physical Address: 27 8th St Melville Johannesburg Gauteng South Africa

Email Address: hello@smilentrepreneurs.com

3. Information Officer

In compliance with POPIA, we have appointed an Information Officer who is responsible for ensuring compliance with the conditions for lawful processing of personal information. You may contact our Information Officer for any queries or requests relating to this Privacy Policy or your personal information:

Information Officer: Adam Botha

Email: adam@smilentrepreneurs.com

Telephone: 082 320 5570

4. Personal Information We Collect

We may collect and process the following categories of personal information, depending on the nature of your engagement with us:

4.1 Identity and Contact Information

This includes your name, surname, identity number or passport number, date of birth, gender, physical and postal address, email address, telephone numbers, and professional title or designation.

4.2 Professional and Business Information

This includes your employer details, job title, professional qualifications, business registration details, tax reference numbers, and any other information relevant to providing our consultancy services.

4.3 Financial Information

Where necessary for billing and payment purposes, we may collect banking details, credit or debit card information, VAT registration numbers, and payment history.

4.4 Technical and Usage Information

When you visit our website, we may automatically collect information such as your IP address, browser type and version, operating system, device information, pages visited, time spent on pages, and referring website addresses.

4.5 Communication Records

We retain records of correspondence between us, including emails, meeting notes, and other communications related to our services.

5. How We Collect Personal Information

We collect personal information through various means, including directly from you when you engage our services, complete forms on our website, correspond with us, or attend meetings and workshops. We may also receive information from third parties such as referral sources, business partners, publicly available sources, and credit bureaus where authorised by law.

6. Legal Basis for Processing

In accordance with Section 11 of POPIA, we process your personal information only where we have a lawful basis to do so. This includes processing with your consent, processing necessary to fulfil a contract with you, processing required to comply with legal obligations, processing necessary to protect your legitimate interests or those of another person, and processing for our legitimate business interests where these do not override your rights and interests.

7. Purposes for Processing

We use your personal information for the following purposes: to provide, administer, and improve our consultancy services; to communicate with you regarding our services, including responding to enquiries and providing updates; to process

payments and maintain financial records; to comply with legal, regulatory, and professional obligations; to manage our business relationship with you; to send marketing communications where you have consented; to protect our rights, property, and safety and that of others; to analyse website usage and improve user experience; and for any other purposes to which you have specifically consented.

8. Disclosure of Personal Information

We may share your personal information with the following categories of recipients: service providers and contractors who assist in delivering our services, including IT service providers, accountants, and legal advisers; professional and regulatory bodies where required; government authorities and law enforcement agencies where required by law; and potential acquirers in the event of a business sale, merger, or restructuring. We require all third parties to respect the security of your personal information and to treat it in accordance with applicable law. We do not permit our third-party service providers to use your personal information for their own purposes and only permit them to process your data for specified purposes in accordance with our instructions.

9. Cross-Border Transfers

In accordance with Section 72 of POPIA, we may transfer your personal information to recipients in foreign countries only where the recipient is subject to a law or binding agreement that provides an adequate level of protection substantially similar to POPIA, you have consented to the transfer after being informed of possible risks, the transfer is necessary for the performance of a contract between you and us, or the transfer is necessary for the conclusion or performance of a contract in your interest. Where we transfer personal information to third parties located outside South Africa, we take reasonable steps to ensure your information remains protected.

10. Data Security

We are committed to ensuring the security of your personal information. We have implemented appropriate technical and organisational measures to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures include secure storage systems, access controls, encryption where appropriate, regular security assessments, and staff training on data protection. However, no method of transmission over the Internet or electronic storage is completely secure. While we strive to protect your personal information, we cannot guarantee its absolute security.

11. Security Breach Notification

In the event of a security breach that compromises your personal information, we will notify you and the Information Regulator as soon as reasonably possible, as required by Section 22 of POPIA. Our notification will include a description of the breach, the categories and approximate volume of records and data subjects concerned, the potential consequences, and the measures taken or proposed to address the breach.

12. Data Retention

We will retain your personal information only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the data, whether we can achieve those purposes through other means, and applicable legal requirements. Upon expiry of the applicable retention period, we will securely destroy or anonymise your personal information in accordance with applicable laws and regulations.

13. Your Rights Under POPIA

POPIA provides you with certain rights regarding your personal information. You have the right to be notified that your personal information is being collected and the purpose for collection. You have the right to be notified if your personal information is accessed or acquired by an unauthorised person. You have the right to establish whether we hold personal information about you and to request access to such information. You have the right to request the correction, destruction, or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained personal information. You have the right to object, on reasonable grounds, to the processing of your personal information. You have the right to object to the processing of your personal information for purposes of direct marketing by means of unsolicited electronic communications. You have the right to not be subject to a decision based solely on automated processing of your personal information. You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of your personal information. You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information.

14. How to Exercise Your Rights

To exercise any of your rights or to make a data subject request, please contact our Information Officer using the contact details provided in Section 3. We will respond to your request within a reasonable time and in any event within the timeframes prescribed by POPIA. We may need to verify your identity before processing your request. There is generally no fee for exercising your rights, although we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive, or we may refuse to comply with your request in such circumstances.

15. Cookies and Similar Technologies

Our website may use cookies and similar tracking technologies to enhance your browsing experience, analyse website traffic, and personalise content. Cookies are small text files stored on your device when you visit our website. You can manage your cookie preferences through your browser settings. Please note that disabling certain cookies may affect the functionality of our website. By continuing to use our website, you consent to our use of cookies in accordance with this Privacy Policy.

16. Direct Marketing

We may use your personal information to send you marketing communications about our services, news, and updates that may be of interest to you. We will only send you marketing communications where you have given us consent or where we have a legitimate interest to do so under applicable law. You have the right to opt out of receiving marketing communications at any time by clicking the unsubscribe link in our emails, contacting us directly using the details provided in this Privacy Policy, or by adjusting your preferences where such functionality is available. Even if you opt out of marketing communications, we may still send you non-promotional communications, such as those related to ongoing business dealings.

17. Third-Party Links

Our website may contain links to third-party websites, plugins, or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy practices. We encourage you to read the privacy policy of every website you visit.

18. Children's Privacy

Our services are not directed at children under the age of 18, and we do not knowingly collect personal information from children. If you are a parent or guardian and believe that your child has provided us with personal information without your consent, please contact us immediately, and we will take steps to remove such information from our systems.

19. Changes to This Privacy Policy

We reserve the right to update this Privacy Policy from time to time to reflect changes in our practices or applicable laws. Any changes will be posted on our website with an updated effective date. We encourage you to review this Privacy Policy periodically. Where changes are significant, we will endeavour to notify you directly or through a prominent notice on our website. Your continued use of our services following the posting of changes constitutes your acceptance of such changes.

20. Complaints

If you have any concerns or complaints about how we handle your personal information, please contact our Information Officer in the first instance. We will investigate and attempt to resolve any complaints or disputes regarding our use of your personal information. If you are not satisfied with our response, you have the right to lodge a complaint with the Information Regulator:

Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email: enquiries@infoeregulator.org.za

Website: <https://infoeregulator.org.za>

21. Contact Us

If you have any questions, comments, or requests regarding this Privacy Policy or our data practices, please contact us at:

Smilentrepreneurs

Email: hello@smilentrepreneurs.com

Website: www.smilentrepreneurs.com

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This Privacy Policy was last updated on 14 January 2026.