



FlowCentric

# Unified Global Privacy Policy (Privacy Notice)

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<b>Document Title</b>	<b>Unified Global Privacy Policy (Privacy Notice)</b>		
<b>Document Number</b>	ISMS-DOC-A05-34-4	<b>Revision Number</b>	01
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<b>DOCUMENT OWNER</b>	Information Officer

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## 1 Introduction

FlowCentric (Pty) Ltd ("FlowCentric", "we", "our", "us") is committed to protecting personal information in accordance with the **Protection of Personal Information Act (POPIA)** (South Africa), the **General Data Protection Regulation (GDPR)** (EU/UK), the **Australian Privacy Act 1988**, and other applicable international privacy frameworks.

This Privacy Policy explains how we collect, use, disclose, store, transfer, and protect personal information when providing our software development, process management, and consultancy services.

By engaging with us, accessing our systems (Processware, DSO), visiting our website, or using our services, you agree to the practices described in this Privacy Policy.

## 2 What Personal Information We Collect

We may collect the following categories of personal information:

### 2.1 General Personal Information

- Names, titles, and organizational details.
- Contact information (email, phone, physical address).
- Communications and engagement details.

### 2.2 Technical and Operational Information

- Usernames, authentication credentials, and access logs for our platforms.
- IP addresses, device identifiers, and audit trails.
- System usage information within Processware or DSO.

### 2.3 Sensitive / Special Personal Information

Where necessary and authorized by law (e.g., for our DSO product or HR purposes), we may collect:

- Biometric information (for access control or identity verification).
- Identity verification details.
- Background screening information.
- Note: We only collect sensitive information with explicit consent or as legally required.*

### 2.4 Website, Cookies, and Analytics

- Browsing behaviour.
- Cookie data and similar tracking technologies.

### 2.5 Employment and Recruitment Data

- CVs, qualifications, and employment history.
- References and background check information.
- Payroll information (bank, tax).

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### 3 How We Collect Personal Information

We may collect information through:

- Direct interactions (email, phone, meetings, forms).
- Access to our systems, platforms, or cloud services.
- Recruitment, onboarding, and HR processes.
- Website interactions.
- Third-party providers (e.g., LinkedIn, PNET).

### 4 Why We Collect and Use Personal Information

We collect, hold, and use personal information to:

#### 4.1 Service Delivery

- Provide our software platforms (Processware) and professional services.
- Support digital transformation and process automation.

#### 4.2 Compliance and Governance

- Meet regulatory (POPIA, SARS, Labour Law) and contractual obligations.
- Maintain cybersecurity and operational integrity.

#### 4.3 Business Operations

- Manage client relationships, contracts, and finance.
- Conduct marketing (only with consent where required).

#### 4.4 Human Resources

- Recruitment, onboarding, payroll, and performance management.

### 5 Lawful Basis for Processing (GDPR / POPIA)

We process personal data under the following lawful bases:

- **Performance of a contract:** To deliver the services you have engaged us for.
- **Legitimate interests:** For security, analytics, and business continuity.
- **Compliance with legal obligations:** To meet tax, labour, and reporting laws.
- **Consent:** Where explicitly required (e.g., for marketing or biometric processing).

### 6 International Transfers of Personal Information

FlowCentric is a global organization. We may transfer personal information to locations outside your home country, including:

- FlowCentric entities in the **United Kingdom and Australia**.
- Global cloud hosting regions (e.g., **Microsoft Azure** data centers).

Where required, we implement:

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- Standard Contractual Clauses (SCCs).
- Data Processing Agreements (DPAs).
- Encryption and strict access controls.

## 7 Disclosure of Personal Information

We may disclose personal information to:

- FlowCentric Group entities for technical support.
- Cloud hosting (Microsoft Azure) and cybersecurity (Darktrace) providers.
- Legal, financial, and audit advisors.
- Regulatory bodies (e.g., Information Regulator, SARS) as required by law.

## 8 Data Security

We apply multi-layered security controls, aligned with **ISO/IEC 27001**, including:

- Encryption at rest and in transit (AES-256, TLS 1.2).
- Strict Identity and Access Management (MFA, RBAC).
- Continuous monitoring and intrusion detection.
- Secure development practices.

## 9 Your Rights

### 9.1 South Africa (POPIA)

Under POPIA, you have the right to:

- **Notification:** Know when your personal information is being collected.
- **Access:** Request a record of the personal information we hold about you.
- **Correction:** Request the correction or deletion of inaccurate, irrelevant, or outdated information.
- **Objection:** Object to the processing of your personal information on reasonable grounds.
- **Complaint:** Submit a complaint to the Information Regulator (South Africa) if you believe your rights have been infringed.

### 9.2 Australian APP Rights

You may request access to your personal information and corrections to inaccurate information.

### 9.3 EU / UK GDPR Rights

You have the right to Access, Rectification, Erasure ("right to be forgotten"), Restriction, Objection, Data portability, and to Withdraw consent.

## 10 Cookies and Tracking Technologies

We use cookies for website functionality, analytics, and security. You may adjust your browser settings to reject cookies, though some features may be limited.

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## 11 Data Retention

We retain personal information only as long as necessary to meet legal, contractual, or operational requirements. Once the retention period expires, data is securely deleted or de-identified.

## 12 Children's Data

We do not knowingly collect personal information from individuals under 18 years of age without parental consent.

## 13 Automated Decision-Making

We do not use automated decision-making that produces legal or significant effects on individuals.

## 14 Contact Us

For privacy enquiries, rights requests (DSAR), or complaints, please contact our Information Officer / Data Protection Officer:

**Information Officer:** Denis Bensch (CIO)

**Email:** [privacy@flowcentric.com](mailto:privacy@flowcentric.com)

**Phone:** +27 12 020 4488

**Physical Address:** 146 Boeing Street East, Monument Park, Pretoria, 0181, South Africa

### 14.1 Supervisory Authorities:

- **South Africa:** Information Regulator ([info regulator.org.za](http://info regulator.org.za))
- **Australia:** Office of the Australian Information Commissioner (OAIC)
- **UK:** Information Commissioner's Office (ICO)

## 15 Changes to This Policy

We may update this Policy periodically. The latest version will always be available on our website.