MUNROFIN (PTY) LTD

(Registration Number: 2017/290148/07)

("Munrofin")

PRIVACY POLICY

In terms of the Protection of Personal Information Act 4 of 2013 ("POPIA")

Version 2 | Updated: November 2026 | First compiled: June 2026

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1. INTRODUCTION

1.1 Munrofin (Pty) Ltd offers professional services including accounting, bookkeeping, payroll, taxation, business advisory, business registration and related services.

1.2 This Policy explains how Munrofin (Pty) Ltd Processes Personal Information when it carries on its operations and fulfils its contractual and legal obligations, and sets out the requirements with which it undertakes to comply.

1.3 Munrofin (Pty) Ltd places a high premium on the privacy of every person and organisation with whom it engages, and handles Personal Information with the reasonable standard of care expected of a responsible professional practice.

1.4 When a Data Subject or Third Party engages with Munrofin (Pty) Ltd, whether in person or through any digital or electronic channel such as the Website, Munrofin (Pty) Ltd will Process their Personal Information in accordance with this Policy and the Applicable Laws.

1.5 Data Subjects may object to the Processing of their Personal Information on reasonable grounds, as set out in section 12. Where Personal Information is required by law or is needed to deliver our services, we may not be able to provide the services without it.

2. DEFINITIONS

Term	Meaning
"Accountable Institution"	A person or entity listed in Schedule 1 to the FIC Act. Munrofin (Pty) Ltd is an accountable institution under item 2 of Schedule 1 (trust and company service provider) and must comply with the obligations in the FIC Act.
"Applicable Laws"	POPIA, the FIC Act, the Companies Act 71 of 2008, the Tax Administration Act 28 of 2011, and any other law, regulation, code or regulatory direction that applies.
"Child"	A natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself.
"Consent"	Any voluntary, specific and informed expression of will in terms of which a Data Subject permits the Processing of Personal Information.
"Cookies"	Small text files sent by a web server and stored by a browser on a user's device to identify the user and remember their preferences or activities across Website visits.
"Data Subject"	The person or entity to whom Personal Information relates, including clients, prospective clients, Website visitors, employees, contractors, job applicants and service providers.
"Direct Marketing"	Approaching a Data Subject, in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply goods or services.
"FICA" or "FIC Act"	The Financial Intelligence Centre Act 38 of 2001.
"Information Officer"	The person responsible for ensuring compliance with POPIA within Munrofin (Pty) Ltd, whose details appear in section 13.
"Operator"	A person or entity that Processes Personal Information for Munrofin (Pty) Ltd in terms of a contract or mandate, without coming under its direct authority.

Term	Meaning
"Personal Information"	Information relating to an identifiable, living, natural person and, where applicable, an identifiable, existing juristic person, including: (a) information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth; (b) information relating to education or medical, financial, criminal or employment history; (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment; (d) biometric information; (e) personal opinions, views or preferences; (f) correspondence of a private or confidential nature; (g) the views or opinions of another individual about the person; and (h) the name of the person if it appears with other Personal Information or would reveal information about the person.
"Policy"	This Privacy Policy, as amended from time to time.
"POPIA"	The Protection of Personal Information Act 4 of 2013.
"Processing"	Any operation or activity concerning Personal Information, whether automated or not, including collection, receipt, recording, organisation, storage, updating, retrieval, use, dissemination, restriction, deletion, destruction or anonymisation.
"Regulator"	The Information Regulator (South Africa) established in terms of POPIA.
"Responsible Party"	The person who, alone or with others, determines the purpose of and means for Processing Personal Information.
"Special Personal Information"	Personal Information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour (including alleged offences and court proceedings).
"Third Party"	Any person or organisation other than the Data Subject or Munrofin (Pty) Ltd, including service providers, technology vendors and public authorities.
"Website"	The website operated by or for Munrofin (Pty) Ltd at https://munrofin.co.za.

3. WHO WE ARE

3.1 Munrofin (Pty) Ltd is a private company, registration number 2017/290148/07, of which MJ Munro is the sole director.

3.2 For the purposes of this Policy, Munrofin (Pty) Ltd is the Responsible Party for the Personal Information it collects and Processes in the course of its business.

Entity name	Munrofin (Pty) Ltd
Physical and postal address	1015 Draaibos Avenue, Weltevredenpark X45, Roodepoort, 1709
Telephone	082 315 3350
E-mail	jhb@munrofin.co.za
Website	https://munrofin.co.za

4. SCOPE AND APPLICATION OF THIS POLICY

4.1 This Policy applies to the Personal Information of:

4.1.1 individuals and entities who are clients of Munrofin (Pty) Ltd;

4.1.2 prospective clients who enquire about our services;

4.1.3 employees, job applicants and independent contractors;

4.1.4 suppliers and service providers;

4.1.5 third parties whose Personal Information is given to us in the course of delivering our services (for example directors, members, trustees, beneficial owners and employees of a client);

4.1.6 visitors to our Website (see section 14); and

4.1.7 any other person whose Personal Information we Process in connection with our practice.

4.2 This Policy covers Personal Information Processed in both physical and electronic form, across all our services.

4.3 This Policy must be read together with the Applicable Laws. Further information about POPIA is available on the Regulator's website, www.inforegulator.org.za.

5. PERSONAL INFORMATION WE COLLECT

We collect only the Personal Information that is adequate, relevant and necessary for the purposes in this Policy. What we collect depends on the services we provide to you.

5.1 Identity and contact information

- Full name and surname; identity number, passport number or company registration number; date of birth; gender;
- Residential or business address; telephone and mobile numbers; e-mail address; and
- any other contact or identification detail required for the engagement.

5.2 Financial and tax information

- Income, expense, asset and liability information; financial statements and supporting records;
- Tax reference numbers, tax registration details, SARS correspondence and assessments; VAT registration and turnover information;
- Payroll and remuneration information; bank account details; and business structure, shareholding and directorship details.

5.3 Business and corporate information

- Company or close corporation name and registration details; CIPC records;
- Trust deeds, partnership agreements and other founding documents;
- Details of directors, members, partners, trustees and beneficial owners; and
- B-BBEE certificates and business licensing, registration and compliance records.

5.4 Employment and payroll information

- Where we provide payroll services: employee personal and contact details, employment contracts, leave records, remuneration, deductions and benefits, PAYE, UIF and SDL details, and banking details for salary payments.

5.5 FICA-related information

As an Accountable Institution, Munrofin (Pty) Ltd collects the following information to identify and verify clients and assess risk:

- **Individuals:** full name, identity number (or passport number and country of origin for foreign nationals) and residential address.
- **Legal entities and trusts:** name and registration number, registered and business addresses, details of all directors, members, partners or trustees (including identity or passport numbers), beneficial ownership information (the natural persons who ultimately own or control 5% or more), founding documents, and any information needed to verify the legal form and control structure.
- **Higher-risk clients:** where required by the client's risk rating, information about the source of funds or wealth, the nature and purpose of the business relationship, and other information required for enhanced due diligence.
- **Sanctions and politically exposed persons:** the results of screening against the Targeted Financial Sanctions List, and declarations on whether a person is a politically exposed person or prominent influential person.

5.6 Information about children

We do not collect information directly from children. In the course of tax and payroll services we may receive information about children (for example dependants for tax or medical aid purposes) from a parent, guardian or employer. We Process it only where it is necessary to deliver the service or to comply with the law, or with the consent of a competent person, and only to the extent needed.

5.7 Special Personal Information

We Process Special Personal Information only where POPIA permits it, for example with the Data Subject's consent or where it is necessary to comply with the law. Examples are:

- criminal record checks on employees and contractors, which we perform with their written consent and to comply with our screening obligations under the FIC Act; and
- health-related payroll information (such as medical aid contributions or sick leave), which we Process only as required to calculate and report payroll.

5.8 Where we get Personal Information

We collect most Personal Information directly from you. We may also obtain it from:

- your employer, company, trust or the client who engages us (for example directors', employees' or beneficial owners' details);
- public registers and authorities, including CIPC and, with your authority, SARS eFiling;
- banks and financial records provided by you or with your authority;
- identity verification, vetting and sanctions screening sources, including the Department of Home Affairs and the FIC's Targeted Financial Sanctions List; and
- our Website (see section 14).

5.9 Is the information mandatory?

Information needed to comply with the FIC Act, tax law and company law is mandatory. If a client does not provide it, Munrofin (Pty) Ltd may be unable to establish, continue or complete the business relationship. Information needed to deliver a service is required for that service. Information for marketing is voluntary.

6. HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Munrofin (Pty) Ltd Processes Personal Information only where a lawful basis exists under POPIA. The purposes and lawful bases are:

Purpose	Examples	Lawful basis (POPIA s 11)
6.1 Delivering our professional services	Accounting, tax, payroll, bookkeeping, advisory and business registration services; preparing and submitting returns, financial statements and filings; communicating with SARS, CIPC and other authorities on your behalf; managing your engagement and client file; invoicing and collecting fees.	Performance of our contract with you; your legitimate interests
6.2 Legal and regulatory compliance	Client due diligence, risk assessment, sanctions screening and reporting under the FIC Act; SARS and Companies Act record-keeping; responding to lawful requests from regulators, law enforcement and the Financial Intelligence Centre.	Compliance with an obligation imposed by law
6.3 Business operations	Managing records and administration; protecting the security of our systems; supervising and training staff and contractors; handling complaints and disputes; improving our services.	Our legitimate interests
6.4 Marketing and updates	Sending information about new services and regulatory updates.	Your consent, or our existing client relationship (POPIA s 69)

You may opt out of marketing communications at any time by contacting us using the details in section 13.

7. SHARING OF PERSONAL INFORMATION

Munrofin (Pty) Ltd does not sell Personal Information. We share it only where necessary for the purposes in this Policy, and only with parties who are contractually or legally required to protect it.

7.1 **Within Munrofin (Pty) Ltd:** our director, employees and contractors may access Personal Information only to the extent needed for their work, including for support, compliance oversight, training and quality management. All are bound by confidentiality obligations.

7.2 **Regulatory authorities,** where required by law, including:

- the South African Revenue Service (SARS);
- the Companies and Intellectual Property Commission (CIPC);
- the Financial Intelligence Centre (FIC), including through statutory reports such as cash threshold reports, suspicious and unusual transaction reports and terrorist property reports;
- the Department of Employment and Labour (including the Unemployment Insurance Fund) and the Department of Home Affairs; and
- any other authority with lawful authority to receive the information.

7.3 **Professional advisers and service providers,** including legal advisers and auditors (subject to professional confidentiality), our professional body for practice reviews, cloud software and system providers (for example accounting, payroll and document storage platforms), and identity verification, vetting and sanctions screening providers.

7.4 **Operators:** service providers who Process Personal Information on our behalf are Operators. We conclude written agreements with them requiring them to Process the information only on our instructions, keep

it confidential, maintain appropriate security measures and notify us immediately of any security compromise, as required by sections 20 and 21 of POPIA.

7.5 **Cross-border transfers:** some of our technology providers, such as Microsoft 365/OneDrive and Sage and Google (for Website analytics), may store or Process information outside South Africa. We transfer Personal Information outside South Africa only where section 72 of POPIA permits it, for example where the recipient is subject to a law, binding corporate rules or an agreement that provides an adequate level of protection, or where the transfer is necessary for the performance of our contract with you or you have consented to it.

8. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We keep Personal Information only for as long as necessary for the purpose for which it was collected, or for longer where the law requires it.

Type of record	Minimum retention period
Client engagement and service records	5 years from the end of the engagement
Tax and financial records	5 years from the date of submission or assessment
FICA records (client due diligence, screening and reports)	5 years from the date of the last transaction or the end of the business relationship
Payroll and employment records	5 years, or longer where labour legislation requires
Employee and contractor screening records	5 years after the employment or appointment ends
Marketing and consent records	For the duration of the relationship plus 1 year
POPIA complaints and queries	3 years

Records may be kept longer where litigation, a regulatory investigation or other legal proceedings require it. When records are no longer needed, we securely destroy or delete them (paper records are shredded and electronic records permanently deleted) or anonymise them so that the Data Subject can no longer be identified.

9. HOW WE PROTECT YOUR PERSONAL INFORMATION

Munrofin (Pty) Ltd maintains reasonable technical and organisational measures to protect Personal Information against loss, damage, unauthorised destruction and unlawful access or Processing, including:

- access controls, unique user accounts and multi-factor authentication on our systems;
- encrypted devices and secure, access-restricted cloud storage, with regular backups;
- confidentiality obligations, screening and POPIA training for employees and contractors;
- written Operator agreements with service providers that Process Personal Information for us;
- locked storage for paper records and secure destruction when they are no longer needed; and
- regular review of our security measures to address new risks.

10. SECURITY COMPROMISES (DATA BREACHES)

If there are reasonable grounds to believe that your Personal Information has been accessed or acquired by an unauthorised person, Munrofin (Pty) Ltd will notify the Regulator and you as soon as reasonably possible after

discovering the compromise, as required by section 22 of POPIA, unless the identity of the affected Data Subjects cannot be established. The notice will give enough information for you to take steps to protect yourself.

11. CONSENT AND WITHDRAWAL OF CONSENT

Where we rely on your Consent (for example for marketing), you may withdraw it at any time. Withdrawal does not affect the lawfulness of Processing before the withdrawal.

Where we Process Personal Information to deliver our services, to comply with the law or for another lawful basis set out in section 6, that Processing does not depend on Consent, and the withdrawal of Consent does not affect our right or obligation to continue it.

12. YOUR RIGHTS UNDER POPIA

Your right	What it means
Access	You may ask whether we hold Personal Information about you and request a record of it. Requests may be made under our PAIA Manual, available on our Website.
Correction or deletion	You may ask us to correct or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained, or that we are no longer entitled to keep (POPIA Regulations, Form 2).
Objection	You may object, on reasonable grounds, to Processing based on legitimate interests, and at any time to Processing for Direct Marketing (POPIA Regulations, Form 1).
Withdraw consent	You may withdraw any Consent you have given (see section 11).
Complain to us	You may lodge a complaint with our Information Officer if you are unhappy with how we have handled your Personal Information.
Complain to the Regulator	You may lodge a complaint with the Information Regulator if you believe your rights under POPIA have been infringed (see section 13.2).

To exercise any of these rights, contact our Information Officer (section 13.1). We may ask you to verify your identity before we act on a request. If you object to Processing that is necessary to deliver our services, we may be unable to continue providing them.

13. CONTACT US

13.1 Munrofin (Pty) Ltd – Information Officer

Information Officer	MJ Munro
E-mail	maryna@munrofin.co.za
Telephone	082 315 3350
Physical address	1015 Draaibos Avenue, Weltevredenpark X45, Roodepoort, 1709
Reference	Data Privacy / POPIA Enquiry

13.2 Information Regulator (South Africa)

If you are not satisfied with how we have handled your Personal Information, or believe your rights under POPIA have been infringed, you may lodge a complaint with the Information Regulator:

Information Regulator	Information Regulator (South Africa)
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 / 0800 017 160 (toll free)
Complaints (POPIA)	POPIAComplaints@inforegulator.org.za
Complaints (PAIA)	PAIAComplaints@inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

14. COOKIES AND OUR WEBSITE

14.1 Our Website uses Cookies. These include Cookies that are necessary for the Website to work properly and to keep it secure, and Google Analytics Cookies, which help us understand how visitors use the Website (for example which pages are visited, how long visitors stay and how they found the Website).

14.2 Analytics Cookies collect information such as your device type, browser, approximate location, the pages you visit and an online identifier. We use this information only in combined form, to improve the Website and our services. We do not use it to identify you personally, and we do not use marketing or advertising Cookies.

14.3 Google Analytics is provided by Google, which may Process this information outside South Africa (see section 7.5). More information is available in Google's privacy policy at https://policies.google.com/privacy.

14.4 You can refuse or delete Cookies through your browser settings, and you can prevent Google Analytics from collecting your information by installing the Google Analytics opt-out browser add-on (https://tools.google.com/dlpage/gaoptout). If you refuse Cookies, some parts of the Website may not work as intended.

14.5 Information you submit through the Website (for example a contact form or WhatsApp link) is Processed in accordance with this Policy.

15. UPDATES TO THIS POLICY

This Policy is reviewed at least once a year and whenever there are material changes to our business, our services or the law. The current version is published on our Website and is available from our Information Officer on request.

Version	Date	Changes
1	June 2026	Policy compiled
2	November 2026	Regulator contact details updated; sections on children, Special Personal Information, sources of information, lawful bases, Operators, cookies (including Google Analytics) and data disposal added; client acknowledgement revised; corrections

16. CLIENT ACKNOWLEDGEMENT

By engaging the services of Munrofin (Pty) Ltd, you acknowledge that:

- you have read and understood this Privacy Policy;
- we will Process your Personal Information for the purposes and on the lawful bases set out in section 6, which include the performance of our contract with you and compliance with the law;
- where you provide the Personal Information of others (for example employees, directors or beneficial owners), you are authorised to do so and have informed them of this Policy; and
- where applicable, providing the information required by the FIC Act is a legal requirement and a condition of our being able to serve you.

Your consent is required only for Direct Marketing and any other Processing for which this Policy states that consent is needed.