CAITLYN BOOKKEEPING (PTY) LTD

Numbers with Grace.

CLIENT PRIVACY NOTICE

Your trust matters to me. When you share your financial records, you're trusting me with some of the most personal information about your business and the people who work for you. This notice explains, in plain language, how Caitlyn Bookkeeping (Pty) Ltd ("we", "us") collects, uses and protects your personal information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA).

It forms part of, and should be read with, your Engagement Letter and Terms and Conditions. It also applies to information you share for a Grace Clarity Check before you become a client, and to enquiries you send through our website.

In short

I only collect what I need to look after your books, I keep it confidential and secure, I never sell it, and I only share it where the law requires or you agree. You can ask to see, correct or delete your information at any time, subject to legal retention requirements.

1. Who We Are

Caitlyn Bookkeeping (Pty) Ltd, registered in South Africa under CIPC registration number 2026/748005/07, is the responsible party for the personal information you provide to us about yourself and your business.

Where we process personal information about your employees, customers or suppliers on your behalf, for example in payroll reports or source documents, you are the responsible party and we act as your operator, under Annexure A (POPIA Operator Agreement) of your Engagement Letter.

Our Information Officer is Caitlyn Crous, registered with the Information Regulator under registration number 2026-068241.

2. What Information We Collect

Only what we need to deliver your bookkeeping services.

- **Contact details:** your name, business name, email, phone number and address
- **Registration numbers:** CIPC registration number, income tax number, VAT number and PAYE/UIF reference
- **Financial records:** bank and credit card statements, invoices, receipts and other source documents
- **Grace Clarity Check information:** your questionnaire answers and the sample bank statement you share so I can quote for your books
- **Employee information:** names, ID numbers, tax numbers, remuneration and deductions as shown in the payroll reports you provide, where payroll support is included
- **Banking details:** as needed for bank and credit card reconciliations
- **Correspondence:** letters from SARS, CIPC or other regulatory bodies relevant to your business
- **Newsletter:** if you subscribe to the Grace Newsletter, your first name and email address
- **Website enquiries:** the name, business name, email, phone number and message you send through the booking form on our website

3. Why We Collect It

Your information is used for your services, and nothing else.

- To provide the bookkeeping, reporting, VAT record-keeping and payroll support services you've engaged us for
- To prepare accurate financial records and reports for your business
- To review your books and prepare a quote, if you ask for a Grace Clarity Check
- To communicate with you about your account and our services
- To reply to your website enquiry and arrange your free call
- To send you the Grace Newsletter, only if you have subscribed. You can unsubscribe at any time using the link in every email
- To meet our own legal and regulatory obligations, such as record-keeping requirements

4. Where Your Information Is Processed

Our services are rendered from within South Africa. We use reputable cloud-based service providers, including our accounting software provider (Sage), our document capture app (AutoEntry, a Sage service), our email and hosting providers, our newsletter provider (MailerLite) and AI assistant tools that help me draft and check work, which may store information on servers located outside South Africa. Where this happens, we only use providers that are subject to laws, binding rules or agreements that give your information a level of protection substantially similar to POPIA, as required by section 72 of POPIA.

When I use AI assistant tools, I don't enter identity numbers or banking details, I check everything they produce myself, and no decision about you is ever made by automated means alone.

If you choose to send photos of slips or invoices by WhatsApp, they are end-to-end encrypted while being sent. I save them to your records and then remove them from our chat. Please don't send payroll reports, bank statements or identity documents by WhatsApp; use AutoEntry or email instead.

5. How We Protect Your Information

Your information is kept confidential and stored securely, with access limited to what is necessary to provide our services to you. We take reasonable technical and organisational measures to protect it against loss, damage, unauthorised access or disclosure.

If we have reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, we will notify you and the Information Regulator as soon as reasonably possible, as required by POPIA. Where it concerns information we process on your behalf as your operator, we will tell you immediately, so that you can notify the Information Regulator and the people affected.

6. Who We Share It With

We never sell or rent your information.

- **SARS and other authorities,** where required by law or where you have authorised us in writing to act on your behalf
- **Your tax practitioner, auditor, independent reviewer or accountant,** at your request or with your consent
- **Your payroll provider,** where needed to reconcile your payroll figures
- **Our service providers,** such as Sage, AutoEntry, our email and hosting providers and AI assistant tools, which process information on our behalf only as needed to deliver our services

We do not share your information with any other third party without your consent, except where required by law.

7. How Long We Keep Your Information

We retain copies of working papers and processed records for 7 years, in line with South African record-keeping requirements, including the Tax Administration Act and the Companies Act. After this period, records are securely deleted or disposed of, unless a longer period is required by law.

If you have a Grace Clarity Check and decide not to go ahead, I delete your questionnaire and sample statement within 30 days, unless you ask me to keep them for a later quote.

If you send a website enquiry and don't become a client, I delete your details within 12 months.

Your original financial records remain your property at all times. You remain responsible for keeping your own records for the periods required by law, as set out in your Engagement Letter and Terms and Conditions.

8. Your Responsibilities

Where you provide us with personal information about other people, such as your employees, customers or suppliers, you confirm that you are entitled to share it with us for the purpose of our services, and that those individuals have been informed where required by POPIA. Please let us know promptly if any information you have given us changes.

9. Your Rights

Under POPIA, you have the right to:

- Request access to the personal information we hold about you
- Request correction of any inaccurate or outdated information
- Request deletion of your information, subject to our legal retention obligations
- Object to the processing of your personal information in certain circumstances
- Lodge a complaint with the Information Regulator if you believe your information has been mishandled

10. Contact Us

If you have any questions about this notice or how your information is handled, I'm always happy to help. Please contact our Information Officer at info@caitlynbookkeeping.co.za or via the contact details in your Engagement Letter.

Our PAIA Manual, which explains what records we keep and how to request access to them, is available on our website at caitlynbookkeeping.co.za/paia-manual.pdf.

To lodge a complaint directly with the Information Regulator (South Africa):
Website: inforegulator.org.za (complaints can be lodged online) | Email: enquiries@inforegulator.org.za

Thank you for trusting me with your business.

Warm regards,

Caitlyn Crous
Founder and Information Officer, Caitlyn Bookkeeping (Pty) Ltd