



**MOBIUS**  
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**PRIVACY NOTICE**

MAY 2021

## PRIVACY NOTICE

*Last revision: April 2021* "We", "us" and "our" refers to Mobius Holdings, a registered company in The Republic of South Africa, and includes any parent, subsidiary or related companies, as referenced in the table below.

### Subsidiaries and member companies

Member company	Address	Information Officer
Mobius Services (Pty) Ltd	Unit B107 Buchanan Square 160 Sir Lowry Road	Roelien Howell, Principal Consultant
Phinity Risk Solutions (Pty) Ltd	Woodstock Cape Town 7925	Patrick Ryan, Director
Mobius Holdings (Pty) Ltd		Patrick Ryan, Director
Mobius Partners (Pty) Ltd		Patrick Ryan, Director
Mobius Academy (Pty) Ltd		Lynn Martin, Director
Mobius Professional Services Limited	30 Gay Street Bath United Kingdom BA1 2PA	Patrick Ryan, Director
Mobius Consulting Africa Limited	The Catalyst Building 302 B, 3rd Floor Ebene Mauritius 72201	Vanida Paupiah, Director
Mobius Consulting (Mauritius) Limited	The Catalyst Building 302 B, 3rd Floor Ebene Mauritius	Vanida Paupiah, Director

<b>Member company</b>	<b>Address</b>	<b>Information Officer</b>
	72201	
Mobius International Holdings Limited	The Catalyst Building 302 B, 3rd Floor Ebene Mauritius 72201	Vanida Paupiah, Director
Phinity Risk Solutions International Limited	3rd Floor Ulysses House Foley Street Dublin, 1	Bernard McLoughlin, Director

This privacy notice applies to all prospective, present and past Mobius Stakeholders (Stakeholders), including but not limited to the following:

- Employees, affiliates, consultants and contractors
- Customers (including persons that are involved in the course of service delivery)
- Visitors to our website
- Third Party Service Providers / partners / operators / resellers
- Any party who contracts with us or otherwise uses our products and/or services

We may update this Privacy Notice from time to time and encourage you to review it online periodically.

We are committed to protecting the privacy rights of our Stakeholders. This privacy notice describes our information handling and associated privacy practices. This includes:

- How we collect personal information about our Stakeholders
- How we process and use such personal information
- How we may share personal information
- How we secure personal information



- Stakeholder rights

Our information practices are subject to applicable laws in the countries in which we operate. This means that we engage in the practices described in this notice in a particular country only if permitted under the laws of that country.

We only collect, store and process personal information in accordance with applicable laws and regulations.

### **Types of personal information collected**

We may collect the following types or categories of personal information, including:

- Contact details such as name, email address, telephone number and work location.
- Company details required for third parties and customer administration.
- Confidential information that relates to organisations, for example, information security risks and controls.
- Government issued identification numbers for the purposes of employee application validation, employee administration and third party's registration and administration.
- Information related to candidate or employee race and disability status for BBBEE reporting purposes.
- Other relevant personal information to enable the conduct of business.

### **Personal Information Handling Practices**

We endeavor to notify our Stakeholders about the manner in which, and the purposes for which, we collect and use their personal information. We collect and use personal information for the following purposes:

- To establish and maintain a relationship with our customers, enabling ongoing service delivery.
- To understand customer needs and preferences. For example, we maintain a record of services you have purchased or signed up for.
- Where the collection and processing is required by Law, for example, mandatory tax reporting requirements.



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- For audit and record keeping requirements.
- To conduct statistical or market related research.
- For the administration of remuneration, employment benefits and accounts payable / receivable.
- To evaluate candidates and applicants who submit personal information for employment opportunities.
- To effectively respond to queries submitted through our online "contact us" feature or to individual team members.
- To communicate relevant services and information to Stakeholders.

We may use your personal information collected including but not limited to your name, email, company and job title for purposes of contacting you, sending notifications, updates and invitations to events. If you would like to withdraw your consent for such processing, you may use the "contact us" feature on this website.

Unless required or permitted by law, we shall not use or disclose personal information or sensitive personal information for a new purpose that has not been identified and consented to by you.

## **Cookies**

Currently we only use cookie technology that is strictly necessary for administration and operation of our website. These are necessary to enable you to click through our website.

## **Choice and Consent**

In most circumstances, we receive personal information directly from you. For example, when you request services or tools from us, we may require personal information for contact or billing purposes.

We will only require you to consent to the collection, use or disclosure of personal information as per the identified purposes in this notice. We will not unreasonably withhold products, services or information if you refuse or withdraw your consent.

You may withdraw or modify your consent at any time, subject to legal and contractual restrictions, provided that reasonable notice is given to us. If you would like to withdraw



your consent for such processing, you may use the “contact us” feature on this website or send a query to [info@mobiusgroup.com](mailto:info@mobiusgroup.com). Please allow at least 30 days for us to effect changes in communication preferences.

### **Third Parties**

We may make use of third party services to support our service delivery to Stakeholders. Our third parties are vetted in terms of information protection risks and agree to required privacy practices and controls. Examples of third parties with whom we may share personal information, include:

- Member companies within Mobius
- Regulators
- Selected and contracted service providers that support our service delivery
- Persons acting on our behalf (incl. affiliate consultants and third parties)
- Auditors

We will not share personal information with third parties other than as disclosed in this notice or explicitly agreed with you. Further, we will only disclose your personal information if:

- The law requires it.
- We have a public duty to disclose the information.
- If it is reasonably necessary to prevent illegal activity.
- Our or your legitimate interests require disclosure.
- You consented to such disclosure.

### **Cross Border Transfer**

We operate globally, and in certain instances, may process personal information in other countries to support ongoing business delivery. Some countries may not be subject to data protection laws or policies which are as stringent as the data protection laws applicable to



the European Union and/or in South Africa. Where this is the case, we will ensure that the receiving party agrees in writing to implement adequate privacy principles before we share any personal information with such party.

### **How we secure Personal Information**

We endeavor to protect the security, availability and confidentiality of personal information by implementing and maintaining reasonable technical and organisational controls. Our controls are aligned to leading practices and frameworks, including ISO27000 series and other generally accepted controls for information security.

### **Your Privacy rights**

We take note of your rights under applicable data privacy and related legislation, specifically your right to object, upon reasonable grounds, to your personal information being processed. Further, you have the right to request access to the personal information we hold about you by contacting us or completing the PAIA Request Form available at [http://www.justice.gov.za/forms/paia/J752\\_paia\\_Form%20C.pdf](http://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf).

Alternatively, and in countries outside of South Africa you may write to us and send your request to [info@mobiusconsulting.co.za](mailto:info@mobiusconsulting.co.za).

### **Queries and complaints**

If you have any queries or complaints about Privacy, please contact us via email at [info@mobiusgroup.com](mailto:info@mobiusgroup.com)

### **External links**

Our website may contain links to external websites and sources of information. This does not indicate endorsement by us and due care should be taken before following such links.



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### **Information Regulator**

Should you wish to contact the South African Information Regulator, we have provided their contact details:

Telephone: 012 406 4818

Fax: 086 500 3351

Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

### **Supervisory Authority**

Should you wish to contact the supervisory authority applicable to your member state, please email us at [info@mobiustgroup.com](mailto:info@mobiustgroup.com) to request the relevant contact details.