



## **Privacy Notice**

At Bartley Thomas Motsoeneng & Associates, we treat Personal Information with care and handle it in line with the Protection of Personal Information Act (POPIA) and other applicable legal requirements. We also take reasonable steps to keep the information we hold secure.

This Notice explains what information we collect, how we use and share it when necessary and the rights you have in relation to your Personal Information.

This Notice sets out:

- Who we are
- The Information we collect
- Purpose for which we use information
- How Personal Information is collected
- The sharing of Personal Information
- Information security at BTMA
- Retention of Personal Information
- Data Subject Rights
- Cookies and Website Usage
- Changes to this Privacy Notice
- BTMA's Information Officer's contact details
- The Information Regulator's contact details

### **WHO WE ARE**

In this Notice, "Bartley Thomas Motsoeneng & Associates", "BTMA", "the Company", "we", "us" or "our" refers to Bartley Thomas Motsoeneng & Associates (Pty) Ltd.

### **THE INFORMATION WE COLLECT**

As a business management consultancy, incorporating Health and Safety, Recruitment and Human Resource services, BTMA may collect and process Personal Information relating to clients, employees, candidates, contractors, suppliers and other individuals engaged with the Company. Depending on the nature of the services provided, this information may include identification and contact details, employment and educational history, recruitment and payroll information, health and safety records, compliance documentation, contractual information, financial details and communication records required for operational, legal and service-related purposes.

### **PURPOSE FOR WHICH WE USE INFORMATION**

We may process Personal Information for purposes including:

- Recruitment and employment administration

- Human resources management
- Payroll administration
- Client relationship management
- Service delivery
- Health and safety compliance
- Contractor and supplier management
- Financial and accounting administration
- Compliance with legal and regulatory obligations
- Security and operational purposes
- Communication and business administration

## **HOW PERSONAL INFORMATION IS COLLECTED**

Personal Information may be collected directly from individuals during the course of recruitment, employment, contractual or business engagements with the BTMA. Information may also be obtained through communication with the Company, authorised third parties or publicly available sources where permitted by law.

## **SHARING OF PERSONAL INFORMATION**

Personal Information may be shared where necessary with regulatory authorities, payroll and benefits administrators, IT and cloud service providers, professional advisors, recruitment platforms, financial institutions, contractors and other service providers involved in supporting the Company's operations, as well as any other third parties where disclosure is required by law. The Company takes reasonable steps to ensure that any third parties receiving such information implement appropriate confidentiality and security safeguards to protect it.

## **INFORMATION SECURITY AT BTMA**

BTMA has implemented reasonable technical and organisational measures to protect Personal Information against loss, unauthorised access, disclosure, damage, misuse and unlawful processing.

These measures may include access controls, password protection, anti-virus and firewall systems, secure cloud based platforms, restricted access to records and employee confidentiality and awareness obligations designed to support the protection of information across all areas of the business.

## **RETENTION OF PERSONAL INFORMATION**

Personal Information will only be retained for as long as necessary to fulfil the purpose for which it was collected or as required by law. Where information is no longer required, the Company will take reasonable steps to securely destroy or delete such information.

## **DATA SUBJECT RIGHTS**

Subject to applicable law, individuals may request access to their Personal Information, ask for corrections where details are inaccurate, object to certain forms of processing or request deletion of information where this is legally permitted. Individuals may also raise concerns or lodge complaints regarding how their Personal Information is being processed.

All such request should be directed to the Information Officer using the contact details provided in this Notice.

## **COOKIES AND WEBSITE USAGE**

Where applicable, our website may use cookies or similar technologies to improve functionality, enhance user experience and support basic website analytics. Users can adjust their browser setting to manage or disable cookies if they prefer.

## **CHANGES TO THIS PRIVACY NOTICE**

BTMA may update this Privacy Notice from time to time to reflect operational, legal or regulatory changes. The most recent version will always apply and will be made available where required.

## **INFORMATION OFFICER CONTACT DETAILS**

Requests, queries or complaints relating to this Privacy Notice or the processing of Personal Information may be directed to:

|                     |                                                        |
|---------------------|--------------------------------------------------------|
| Information Officer | Linda Mc Elhenny                                       |
| Contact Number      | (+27) 11 478 1536                                      |
| E-mail address      | <a href="mailto:linda@btma.co.za">linda@btma.co.za</a> |

## **INFORMATION REGULATOR**

You have the right to lodge a complaint with the Information Regulator if you believe your personal information has been handled in a way that does not comply with privacy laws.

Website: <https://inforegulator.org.za>  
General enquiries: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)  
Complaints: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)

*Version 1, May 2026*