

Privacy Notice

How Eagles Unchained (Pty) Ltd collects, uses, shares and protects personal information, in terms of the Protection of Personal Information Act 4 of 2013 (POPIA).

1. Who we are

Eagles Unchained (Pty) Ltd (“we”, “us”, “the Company”) is a South African technology and business consultancy. We respect your privacy and handle personal information lawfully, transparently and securely.

This notice explains what personal information we collect, why we process it, who we share it with, and the rights you have. It applies to our website, our services, and our dealings with clients, suppliers, employees and enquirers.

Responsible party	EAGLES UNCHAINED (PTY) LTD
Registration number	2025/346530/07
Information Officer	Nkululeko José Mampana
Address	16 Hlobane Crescent, Crystal Park, Benoni, Gauteng, 1501
Email	nkulee86@gmail.com
Telephone	073 870 8031

When we act for a client. Where we build, host or maintain a system for a client, the personal information inside that system belongs to and is controlled by that client. We process it as an **operator** on their written instructions, and you should direct requests about that information to them.

2. Information we collect

WHO YOU ARE	WHAT WE MAY COLLECT
Website visitors & enquirers	Name, email address, telephone number and the content of your message.
Clients & prospective clients	Contact and company details, physical and postal address, company registration and tax numbers, banking details for invoicing, contracts, project records and correspondence.
Suppliers & operators	Contact details, account and banking information, and contractual records.
Employees & contractors	Identity and contact details, ID number, banking, tax and payroll information, and employment records.
Technical data	Basic information your browser sends when you visit our website, such as pages viewed and general location, used to keep the site secure and working.

We do not seek special personal information — such as race, health, religious or political beliefs, or biometric data — unless it is necessary for a specific lawful purpose and we have the authorisation POPIA requires.

3. How we collect it

- **Directly from you** — when you contact us, request a quotation, sign an agreement, or work with us.
- **Through our website** — when you complete the contact form or email us.
- **From your organisation** — where a colleague or employer provides your work contact details.
- **From public sources** — such as company registers, where we need to verify a business.

We collect information directly from you wherever it is practicable to do so.

4. Why we process it, and our lawful basis

POPIA requires a lawful justification for every use of personal information. Ours are set out below.

PURPOSE	LAWFUL BASIS
Responding to your enquiry	Your consent, or our legitimate interest in answering you
Preparing quotations and agreements	Steps taken at your request before concluding a contract
Delivering our services and support	Performance of our contract with you
Invoicing and collecting payment	Performance of our contract; our legitimate interests
Accounting, tax and statutory records	Compliance with a legal obligation
Managing employees and suppliers	Contract and legal obligation
Securing our systems and preventing fraud	Our legitimate interests
Sending service updates or marketing	Consent, or the existing-customer exception in section 69 of POPIA

5. Providing your information

Supplying your personal information is voluntary. However, some information is necessary for us to act — for example, we cannot prepare a quotation, conclude an agreement or invoice you without your contact and billing details. If you choose not to provide it, we may be unable to provide the service you have asked for.

Certain information is required by law, such as the records we must keep for tax purposes.

6. Who we share it with

We do not sell your personal information. We share it only where necessary, and every operator who processes information on our behalf is bound by a written agreement in terms of section 21 of POPIA requiring confidentiality and appropriate security.

RECIPIENT	WHY
Hosting & cloud providers	Hosting websites, applications and stored files
Email & productivity platforms	Business email, documents and calendars
Application development platforms	Building and running the systems we deliver
Messaging & communication providers	Sending notifications you have asked for, such as WhatsApp or SMS updates
Accounting & payroll providers	Bookkeeping, invoicing and payroll administration
Banks & payment providers	Receiving and processing payments
Regulators, SARS & professional advisors	Where required by law, or to establish or defend a legal claim

7. Cross-border transfers

Some of the cloud services we rely on — including email, storage and application hosting — store or process information on servers outside South Africa.

Where that happens, we transfer information in terms of **section 72 of POPIA**, relying on data-processing agreements and standard contractual terms with those providers that give your information a level of protection substantially similar to POPIA, or on your consent where that is required. We tell clients where their data will be hosted.

8. How long we keep it

We keep personal information only as long as necessary for the purpose it was collected for, unless the law requires longer or we need it to establish or defend a legal claim. When a retention period ends, we securely destroy or de-identify the records.

RECORDS	RETENTION
Accounting and tax records	5 years
Company statutory records	7 years or longer
Client contracts and project records	5 years after the engagement ends
Employee records	5 years after termination
Website enquiries and marketing contacts	2 years from last contact
Client system data (held as operator)	As instructed by the client

9. How we protect it

We apply appropriate, reasonable technical and organisational measures to keep personal information secure, and we review them periodically. These include:

- Access controls and multi-factor authentication on business accounts, granted on a least-privilege basis.
- Encryption of devices and disks, and encrypted transmission (SSL/TLS) on our websites and client systems.
- Credentials and API keys stored in an encrypted vault, never in plain text.
- Regular backups with periodic restore testing.
- Written agreements with every operator, and secure disposal of paper records.

If something goes wrong. If we have reasonable grounds to believe your personal information has been accessed by an unauthorised person, we will notify the Information Regulator and you as soon as reasonably possible, as section 22 of POPIA requires, and tell you what happened and what you can do about it.

10. Your rights

Under POPIA you have the right:

- To be told when we collect your personal information, and when it has been accessed without authorisation.
- To ask us to confirm, **free of charge**, whether we hold personal information about you, and to request a copy of it (a fee may apply to the copy).
- To ask us to correct or delete information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained.
- To object, on reasonable grounds, to our processing of your information.
- To withdraw your consent at any time, where processing is based on consent. This does not affect processing that already happened.
- To object to direct marketing and unsubscribe at any time.
- To complain to the Information Regulator, and to institute civil proceedings.

To exercise any of these rights, contact our Information Officer at nkulee86@gmail.com. We will verify your identity and respond within **30 days**. Formal access requests follow the procedure in our [PAIA Manual](#).

11. Direct marketing

We may send you information about our services by email or electronic message if you have consented, or if you are an existing customer and we obtained your details in the course of a sale of similar services. You were given the chance to object when we collected your details, and every message we send includes a way to opt out.

If you are not an existing customer, we may approach you only once to ask for your consent, and we will not approach you again if you decline. To stop marketing at any time, reply to any message or email us.

12. Cookies and our website

Our website is deliberately simple. It does not set advertising or tracking cookies and does not profile visitors. Your browser may store basic technical information needed for the site to display correctly and securely.

If we add analytics or other cookies in future, we will update this notice and, where the law requires it, ask for your consent first.

13. Children's information

Our services are aimed at businesses, and we do not knowingly collect the personal information of children. Where processing children's information is genuinely necessary for a client project, we do so only with the consent of a competent person or under another authorisation permitted by POPIA. If you believe we hold a child's information without proper authorisation, please contact us and we will address it.

14. Changes to this notice, and how to complain

We review this notice at least annually and whenever our services, systems or the law change materially. The current version is always published on this page.

If you have a concern, please contact our Information Officer first — we would like the chance to put it right. You also have the right to complain directly to the Information Regulator:

**Information
Regulator (South
Africa)**

JD House, 27 Stiemens Street, Braamfontein,
Johannesburg, 2001

Website

www.inforegulator.org.za

POPIA complaints

POPIAComplaints@inforegulator.org.za

PAIA enquiries

PAIAComplaints@inforegulator.org.za

Version

1.0

Approved by

Nkululeko José Mampana, Information Officer