

BLACK HEATH ADVISORY INC.

POPIA Privacy Policy and PAIA Manual

Version 4.1. Effective 19 July 2026.

FINAL PUBLIC DOCUMENT

Supersedes v4.0 of 19 July 2026. See the Document history at the end of this manual.

Published by Black Heath Advisory Inc. (registration number 2013/084518/21), a personal liability company, in compliance with section 51 of the Promotion of Access to Information Act, 2000, and in support of the firm's transparency obligations under section 18 and following of the Protection of Personal Information Act, 2013.

16 Invicta Road, Thandanani Office Park, Midrand, 1685

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Web: blackheathadvisory.co.za

Registered with SAICA and SARS.

Document control

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Published by Black Heath Advisory Inc. (registration number 2013/084518/21), a personal liability company, in compliance with section 51 of the Promotion of Access to Information Act, 2000 (Act 2 of 2000) (PAIA), and in support of the firm's transparency obligations under section 18 and following of the Protection of Personal Information Act, 2013 (Act 4 of 2013) (POPIA).

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Relationship to the website Privacy Notice

The firm also publishes a Privacy Notice at blackheathadvisory.co.za/privacy. That notice is the section 18 notification for personal information collected through the website, such as Contact form enquiries. This document governs the firm's processing more broadly, including client engagements. Where the two overlap, the website notice governs website data and this document governs everything else.

Part A. POPIA Privacy Policy

Protection of Personal Information Act, 2013. Last reviewed July 2026.

1. Introduction and scope

Black Heath Advisory Inc. (the firm) is a responsible party under POPIA. The firm processes personal information in the course of delivering audit, tax, advisory and consulting services to clients across South Africa and selected international markets. This policy sets out how the firm collects, processes, stores, retains and protects personal information, and how data subjects may exercise their rights under POPIA.

This policy applies to all directors, employees, contractors and operators of the firm, and to all personal information processed by or on behalf of the firm, irrespective of medium or format.

2. Information Officer

The firm's Information Officer is registered with the Information Regulator in accordance with section 55 of POPIA. The Information Officer is responsible for the firm's compliance with POPIA, the handling of data subject requests, and engagement with the Information Regulator.

INFORMATION OFFICER

Mr Nkhumeleni Musekwa | Title: Director

Email: info@blackheathadvisory.co.za | Telephone: 010 502 0108

Registered with the Information Regulator on 18 July 2026, registration number 2026-062445.

DEPUTY INFORMATION OFFICER

None appointed.

3. Categories of personal information processed

- Identifying information (full name, identity number, passport number, date of birth, nationality).
- Contact information (residential and business address, email address, telephone numbers).
- Financial information (bank account details, source of funds, tax registration numbers, financial statements provided by clients).
- Employment information (job title, employer, employment history, professional qualifications).
- Special personal information processed only with consent or under another lawful basis in section 27 of POPIA.

4. Purposes of processing

The firm processes personal information for the following purposes: provision of contracted professional services; client acceptance and continuance procedures, including FICA-mandated Know-Your-Client checks; engagement letter and contract administration; billing, collection and accounting; statutory and regulatory reporting; quality management and engagement quality review in line with ISQM 1; engagement with SARS, IRBA, SAICA and other regulators where required; responding to legal process; and internal training and continuing professional development.

5. Lawful basis and consent

The firm relies on the lawful processing grounds set out in sections 11 and 27 of POPIA. In most cases processing is necessary for the performance of a contract with the data subject, for compliance with an obligation imposed by law (including the Financial Intelligence Centre Act and the Auditing Profession Act),

or for the legitimate interests of the firm or a third party. Where none of these apply, the firm relies on the data subject's consent, which may be withdrawn at any time without affecting the lawfulness of processing prior to withdrawal.

6. Recipients and cross-border transfers

Personal information may be shared with: contracted operators who process information on the firm's instructions and under written agreement; regulators (SARS, SAICA, IRBA, the Information Regulator, the Financial Intelligence Centre); legal advisors; the firm's bankers and insurers; and other professional advisors authorised by the client.

Personal information may be transferred outside the Republic only on a ground permitted by section 72 of POPIA. The ground relied on depends on the transfer:

Website enquiries. Where personal information is submitted through the firm's website, the firm relies on the data subject's consent, given when the enquiry is submitted and after being informed that the transfer occurs, and on the transfer being necessary to respond to the enquiry the data subject has made. This matches the firm's published website Privacy Notice.

Client engagement information. Where personal information forms part of a client engagement, the firm relies on the ground applicable to that transfer, which may include that the transfer is necessary for the performance of the engagement, that it is necessary for the conclusion or performance of a contract concluded in the interest of the data subject, or that the recipient is subject to a law, binding corporate rule or binding agreement upholding principles for the lawful processing of personal information that are substantially similar to those in POPIA.

The firm contracts with its operators in writing in line with section 21 of POPIA, and those agreements address the protection of personal information transferred to them.

7. Retention periods

Personal information is retained only for as long as required to fulfil the purpose for which it was collected, or as required by law. The firm applies the following minimum retention periods:

- Audit working papers and engagement records: a minimum of five years from the date of the auditor's report, in line with the Auditing Profession Act and IRBA requirements.
- Tax records and SARS correspondence: a minimum of five years from the date of submission, in line with section 29 of the Tax Administration Act.
- FICA records (identification, verification, transaction records): a minimum of five years from the end of the business relationship, in line with section 23 of FICA.
- Company secretarial records: as required by the Companies Act for the lifetime of the entity and seven years thereafter.
- Marketing and prospecting information: until consent is withdrawn or two years after last contact, whichever is sooner.

Website enquiries. Enquiries submitted through the firm's website that do not become an engagement are retained for 12 months from last contact. Records of consent, and of any withdrawal of consent, are retained for 3 years thereafter. Where a website enquiry becomes an engagement, the periods above apply instead.

8. Data subject rights

Data subjects have the following rights under POPIA: to be notified that personal information about them is being collected; to request access to personal information held by the firm; to request the correction or

deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; to object to processing on reasonable grounds; to object to direct marketing; and to submit a complaint to the Information Regulator.

Requests are submitted in writing to the Information Officer using the procedures set out in Part B of this document, and are responded to within 30 days unless a permitted extension applies.

9. Security safeguards

The firm has implemented and maintains reasonable, appropriate, technical and organisational measures to protect personal information from loss, damage, unauthorised destruction, and unlawful access or processing. These measures include access controls and least-privilege provisioning; full-disk and transport-layer encryption; multi-factor authentication on remote access and privileged accounts; documented backup and recovery procedures; secure document management and physical access controls at the firm's premises; pre-employment screening and ongoing security awareness training; written operator agreements in line with section 21 of POPIA; and periodic independent security testing.

The firm works with sensitive and confidential client information. Where an assignment requires a higher standard of personnel assurance, the firm additionally obtains police clearance or state security vetting for the personnel assigned to that engagement, to the standard required by the client or by the applicable regulatory framework.

10. Breach response

Where the firm has reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by an unauthorised person, the firm will notify the Information Regulator and the affected data subject as soon as reasonably possible after the discovery of the compromise, in line with section 22 of POPIA. The firm targets notification to the Information Regulator within 72 hours of discovery as a matter of internal standard.

INFORMATION REGULATOR (SOUTH AFRICA)

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Postal: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email: enquiries@inforegulator.org.za

Telephone: 010 023 5200 | Toll free: 0800 017 160 | Web: inforegulator.org.za

11. Complaints and contact

Data subjects who believe their personal information has been processed in a manner inconsistent with this policy or POPIA may lodge a complaint with the Information Officer in writing. The firm will acknowledge receipt within five business days and respond on the substance within 30 days. Complaints may also be lodged directly with the Information Regulator at the address above.

Part B. PAIA Manual

Promotion of Access to Information Act, 2000. Section 51 Manual.

1. Particulars of the firm

Name of body	Black Heath Advisory Inc.
Type of body	Private body: personal liability company, professional services
Registration number	2013/084518/21
Head of body	Mr Nkhumeleni Musekwa, Director
Physical address	16 Invicta Road, Thandanani Office Park, Midrand, 1685
Postal address	As above
Telephone	010 502 0108
Email	info@blackheathadvisory.co.za
Web	blackheathadvisory.co.za

2. Information Officer and Deputy Information Officer

INFORMATION OFFICER

Mr Nkhumeleni Musekwa, Director

Email: info@blackheathadvisory.co.za | Telephone: 010 502 0108

Information Regulator registration number 2026-062445, registered 18 July 2026.

DEPUTY INFORMATION OFFICER

None appointed. All requests are directed to the Information Officer.

3. PAIA Guide and section 14 and 15 records

The PAIA Guide compiled by the Information Regulator under section 10 of PAIA is available in all official languages on the Information Regulator's website at infoeregulator.org.za. It provides general guidance to members of the public on how to exercise rights under PAIA.

Records voluntarily disclosed by the firm in terms of section 15 of PAIA are published on the firm's website at blackheathadvisory.co.za.

4. Records held by the firm

Records are held in the following categories:

- Statutory records: company registration documents, share register, directors register, minutes of board and shareholder meetings, annual returns, beneficial ownership register.
- Financial records: general ledger, trial balances, management accounts, annual financial statements, audit working papers, tax returns and SARS correspondence.
- Client records: engagement letters, client identification and verification records (FICA), correspondence, deliverables, working papers and final reports.
- Human resources records: employment contracts, personnel files, payroll, leave and disciplinary records, qualifications and continuing professional development records.

- Operational records: insurance policies, banking records, supplier contracts, lease and property records, information technology and security policies.
- Marketing and prospect records: contact lists, marketing consents, opt-outs, and prospect engagement notes.

5. Request procedures

Requests for access to records held by the firm are made on Form 02 prescribed by the Information Regulator. The form must be completed in full and submitted by email to the Information Officer at info@blackheathadvisory.co.za or by hand at the firm's physical address. The requester must identify the record sought with sufficient particularity, provide proof of identity (and proof of authority where acting on behalf of another), and state the form of access sought.

The Information Officer will respond to a request within 30 days of receipt, which may be extended by a further 30 days where one or more of the grounds in section 57 of PAIA applies. The requester will be notified in writing of any extension.

6. Fees

Personal requesters seeking records about themselves do not pay a request fee. Other requesters pay the prescribed request fee on submission of the request, and an access fee calculated at the rates set out in the regulations published under PAIA, covering reproduction, search and preparation time, and postage where applicable. The Information Officer will provide a fee estimate before any access fee is incurred.

7. Grounds for refusal

The firm may refuse access to a record on the grounds set out in Chapter 4, Part 3 of PAIA, including:

- Mandatory protection of the privacy of a third party who is a natural person (section 63).
- Mandatory protection of commercial information of a third party (section 64).
- Mandatory protection of confidential information of a third party (section 65).
- Mandatory protection of the safety of individuals and the protection of property (section 66).
- Mandatory protection of records privileged from production in legal proceedings (section 67).
- Commercial information of the firm itself (section 68).
- Research information of the firm and third parties (section 69).

8. Remedies when a request is refused

PAIA does not provide for an internal appeal against a decision of a private body; the internal appeal procedure in the Act applies to public bodies only. A requester whose request has been refused or deemed refused, who disputes the fees charged or the form of access granted, or who is otherwise dissatisfied with a decision of the firm may:

- ask the firm in writing to reconsider the decision. The firm voluntarily undertakes that a reconsideration request will be considered afresh by the Information Officer and answered within 30 days. This reconsideration is offered as good practice; it is not a statutory step, and it does not suspend or limit the statutory remedies below;
- lodge a complaint with the Information Regulator in terms of section 77A of PAIA, using the complaint form available from the Regulator. The Regulator's contact details appear in section 9 below; or
- apply to a court of competent jurisdiction in terms of section 78 of PAIA.

9. Information Regulator contact details

INFORMATION REGULATOR (SOUTH AFRICA)

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Postal: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email: enquiries@inforegulator.org.za

Telephone: 010 023 5200 | Toll free: 0800 017 160 | Web: inforegulator.org.za

10. Annexures

Form 02 (Request for Access to Record of Private Body) is available from the Information Regulator's website at inforegulator.org.za and from the firm's Information Officer on request. A current signed copy of this manual is held at the firm's registered office and is available for inspection during ordinary business hours.

Document history

v4.0, 19 July 2026. First published edition. Corrected the unpublished v3.0, which carried the wrong legal entity throughout, unfilled template placeholders and an out-of-date Information Regulator address.

v4.1, 19 July 2026. Part B section 8 corrected: the previous wording offered an internal appeal in terms of section 74 of PAIA, but that procedure applies to public bodies. The section now sets out the remedies actually available against a private body: voluntary reconsideration by the firm, a complaint to the Information Regulator under section 77A, and an application to court under section 78. The website Privacy Notice address was updated to its current form (blackheathadvisory.co.za/privacy). No other content changed.

Approved by the Information Officer, Black Heath Advisory Inc.

INFORMATION OFFICER / SIGNATURE: _____ DATE: 19 July 2026