

# THE INTEGRATED APPROACH

CB | Web Design **POPIA: Data Protection Policy, Procedures & Manual Effective**  
**Date:** 1 September 2025

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[theintegrated.co.za](http://theintegrated.co.za) | [celmabrummer.com](http://celmabrummer.com)

## 1. Introduction

The Integrated Approach, including its division CB | Web Design, ("the Company") is committed to ensuring compliance with the Protection of Personal Information Act (Act 4 of 2013) ("POPIA"). This policy outlines our commitment to protecting personal information in accordance with POPIA.

## 2. Definitions

**Personal Information:** Information relating to an identifiable, living, natural person, and juristic person.

**Data Subject:** The individual or company to whom personal information relates.

**Responsible Party:** The Company, which determines the purpose of processing personal information.

**Operator:** A person who processes information on behalf of the Responsible Party.

## 3. Purpose of Processing Personal Information

We process personal information to:

Provide, manage and improve services (including CB | Web Design services).

Contact our clients, suppliers, and service providers.

Marketing, transaction processing, and regulatory compliance.

## 4. Types of Personal Information Collected

May include:

Names, contact details (email, telephone, address).  
Company details, VAT/registration numbers.  
Demographic information, website analytics.  
Project/job information, payment/transaction details.  
Any other information necessary for providing services.

## **5. Legal Basis for Processing**

We process personal information:

With the consent of the Data Subject.  
To fulfil contractual obligations.  
To comply with legal requirements.  
When it is in our legitimate interests.

## **6. How Information Is Collected**

Website forms (including [theintegrated.co.za](http://theintegrated.co.za), [celmabrummer.com](http://celmabrummer.com))  
Direct email/telephonic contact  
Contracts/quotations/proposals  
Invoices, payment gateways  
Third-party referrals

## **7. How Information Is Stored**

Secure cloud platforms (with password access)  
Secure on-premises computers/devices  
Password-protected internal databases or folders  
Encrypted backup solutions  
Physical and digital security measures are in place and reviewed annually.

## **8. Disclosure and Sharing of Information**

Personal information is *never* sold. It is shared only to the extent necessary, e.g.:

To personnel and service providers, strictly for administrative/fulfillment purposes.

With consent, or as required by law.

## 9. Data Subject Rights

Data Subjects have the right to:

Access their personal information.

Request correction, deletion, or destruction of their data.

Object to processing.

Withdraw consent at any time.

**Request Procedure:** Requests can be submitted to [celma@theintegrated.co.za](mailto:celma@theintegrated.co.za) or via the web forms. Requests are processed per PAIA guidelines, within indicated statutory timeframes.

## 10. Information Officer

**Name:** Celma Brummer **Contact:** [celma@theintegrated.co.za](mailto:celma@theintegrated.co.za) | +27 72 612 6580

The Information Officer is responsible for:

Ensuring data protection and legal compliance.

Processing any requests regarding personal information.

Training staff and conducting audits.

## 11. Information Security Measures

Staff training on POPIA

Password-protected files/folders

Regular password updates

Internal access controls and permissions

Use of reputable security software/firewalls

Backups and recovery protocols

## **12. Data Retention**

Data is retained as required by law, tax, or contractual need.

When no longer required, information is securely deleted or destroyed.

## **13. Data Breach Procedure**

Any suspected data breach will be:

Reported immediately to the Information Officer.

Investigated and contained.

Data subjects and, if required, the Information Regulator will be notified.

Records of the breach and remedial actions will be kept.

## **14. Direct Marketing**

Personal information is used for direct marketing only with consent. Data subjects can opt out at any time by emailing [celma@theintegrated.co.za](mailto:celma@theintegrated.co.za) or clicking unsubscribe links where available.

## **15. Updating of Policy**

This policy is reviewed annually and updated as required.

## **16. Complaints**

Complaints regarding the processing of personal information can be submitted to:

**Information Officer:** [celma@theintegrated.co.za](mailto:celma@theintegrated.co.za)

Or, if unsatisfied, the South African Information Regulator: Email: [POPIAComplaints@info regulator.org.za](mailto:POPIAComplaints@info regulator.org.za)

## **17. POPIA Manual Management**

This document is the current manual and is available for perusal on request, or via our websites.

## 18. Approval and Version Control

Version	Date	Responsible	Comments
1.0	1 September 2025	Celma Brummer	Initial Publication

### Attachments

**PAIA Manual** (already available, reviewed for alignment with this policy)

**Staff Declaration (sample):** I have read and understood the POPIA Manual and will comply with its provisions.

Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_