



POPIA Compliance Policy (Beeline Learn (Pty) Ltd)

Approved: 24 June 2025

Last Edited: 18 September 2025

Next Review: within 12 months of approval or upon material change

1. Purpose

Beeline Learn (Pty) Ltd ("Beeline") is committed to protecting the privacy and personal information of all users, clients, staff, and partners. This policy sets out how Beeline complies with the Protection of Personal Information Act ("POPIA") and ensures the responsible collection, processing, and safeguarding of personal information.

2. Scope

This policy applies to all employees, contractors, and third parties who access or process personal information on behalf of Beeline Learn (Pty) Ltd.

3. Responsible Data Officers

- **Information Officer:** Dylan Evans, dylan@beelinelearn.com
- **Deputy Information Officer:** Peter Turner, peter@beelinelearn.com

The Information Officer (IO) is registered with the Information Regulator (South Africa) and oversees POPIA and PAIA compliance, including requests, complaints, training, and audits.



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Information Regulator (South Africa) — Contact

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

PO Box 31533, Braamfontein, Johannesburg, 2017

Email: infoereg@justice.gov.za

Website: www.justice.gov.za/infoereg

4. Roles Under POPIA

Beeline may act as:

- Responsible Party — for personal information of our own users, website visitors, employees, and suppliers.
- Operator — when processing personal information on behalf of clients (e.g., learners, staff of client organisations).

Beeline ensures appropriate Operator agreements and safeguards in both roles.

5. Definition

Personal Information means any information relating to an identifiable, living natural person or an identifiable, existing juristic person. This includes (but is not limited to): name, email, phone number, address, role, identity number, online identifiers, and usage data.

6. Purpose of Processing

Beeline processes personal information to:

- Deliver, support, and improve its products and services
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- Manage user accounts and communications
 - Comply with legal, financial, and regulatory obligations
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7. Collection & Usage Principles

- **Minimal & Relevant:** Only collect necessary information
 - **Lawful & Fair:** Processing is based on one or more lawful grounds under POPIA s11, including consent, contractual necessity, compliance with legal obligations, or legitimate interests balanced with data subject rights.
 - **Secure:** Data is protected by encryption, secure access controls, and regular audits
 - **Transparent:** Our Privacy Policy (<https://www.beeline.life/privacy-policy>) and T&Cs (<https://www.beeline.life/terms-of-service>) explain our practices
 - **Direct Marketing:** When applicable, Beeline complies with POPIA s69 (opt-in/opt-out, sender identification, and unsubscribe mechanisms).
 - **Records:** Beeline maintains records of processing activities and trains staff on this policy and related procedures.
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8. Sharing Categories

Personal information may be shared with:

- Service providers (hosting, payment, analytics)
 - Legal and tax authorities (e.g., SARS, UIF)
 - Law enforcement or regulators if required by law
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All sharing is in line with legal requirements and legitimate business operations.

Where Beeline appoints Operators/sub-processors (e.g., hosting, analytics, email, payments), we execute written Operator agreements per POPIA s20 to ensure appropriate security, confidentiality, and only-on-instructions processing.

9. Data Retention & Access

- **Retention:** Personal information is retained only as long as needed for its original purpose or as required by law. Beeline follows a standard Retention Schedule (e.g., account data = life of account + 12 months; logs = up to 12 months; backups = up to 35 days), after which information is securely deleted or archived.
- **Data subject requests:** Individuals may request access, correction, or deletion of their personal information (subject to legal obligations). Formal access requests must follow the procedures in Beeline's PAIA Manual.
- **How to request:** Submit requests to the Information Officer (see §3). Staff must direct requesters to the PAIA Manual and follow the procedures set out therein.

10. Data Subject Rights

Under POPIA, data subjects have the right to:

- Access or correct their personal information
- Request deletion, object to processing
- Lodge complaints with Beeline or the Information Regulator (www.justice.gov.za/inforeg)



Complaints may be lodged with Beeline's Information Officer (see §3) or directly with the Information Regulator (contact details in §3).

11. Security Measures

Beeline uses standard security safeguards, including:

- Encryption and access controls
- Secure cloud hosting (e.g., AWS, Google)
- Staff training on data protection
- Incident response protocols for data breaches

Security Compromise Notification: In the event of a security compromise, Beeline will assess impact and notify the Information Regulator and affected data subjects without undue delay, in line with POPIA s22 and our Incident Response Plan.

12. Policy Updates

This policy will be reviewed annually or when material changes occur. Updates will be published and communicated as appropriate.

13. Processing of Children's Personal Information

Beeline may process children's personal information when acting as an **Operator** for clients such as schools or training providers. Beeline contractually requires the **Responsible Party** (the client) to obtain **verifiable consent from a Competent Person** before any child's data is captured on the platform. Beeline may request evidence of such consent and **reserves the right to audit** client compliance with this obligation. Processing will be limited to what is necessary for the specified educational/service purposes and subject to appropriate safeguards.



Beeline does not knowingly collect children's personal information as a Responsible Party; where Beeline acts as an Operator, processing is strictly limited to agreed purposes with appropriate safeguards.

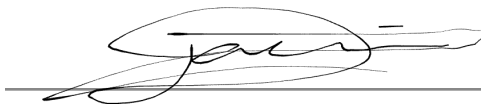
14. Special Personal Information

Beeline avoids processing Special Personal Information (as defined in POPIA ss26–33, e.g., health, biometrics, religious or philosophical beliefs) unless an applicable exception applies (e.g., data subject consent, legal obligation, or processing by/for a not-for-profit with appropriate safeguards). Where clients require such processing, they must ensure a valid exception applies and provide Beeline with appropriate written assurances, which Beeline may audit.

15. Cross-Border Transfers

Where personal information is transferred outside South Africa, Beeline ensures the recipient is subject to a law, binding corporate rules, or contract that provides an adequate level of protection as contemplated by POPIA s72, or relies on explicit data subject consent where appropriate.

Review & Sign-off:



Information Officer – Dylan Evans, 24 June 2025