

WEBSITE PRIVACY NOTICE

Field	Detail
Document Title	Kairos Website Privacy Notice
Document Reference	KAIROS-PRIVACY-NOTICE
Organisation	Kairos Computer Risk Management
Registration Number	2009/034954/23
Classification	Public / External
Version	1.0 Draft
Status	Website Publication
Effective Date	17 October 2025
Website	https://kairoscrm.co.za
Document Owner	Information Officer / CTIO
Information Officer	Gary Grant Adams, CTIO
Related Documents	Kairos PAIA Manual; Kairos Website Terms and Conditions

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1. Introduction

1.1 Purpose of this Privacy Notice

1.1.1 Kairos Computer Risk Management (“Kairos”, “we”, “us” or “our”) respects privacy and is committed to protecting personal information processed through our website, business operations and IT services.

1.1.2 This Privacy Notice explains how Kairos may collect, use, disclose, store, protect and retain personal information when you:

1. visit our website;
2. contact us through the website, email, telephone or other communication channels;
3. request a quotation or service information;
4. become or act on behalf of a client, supplier, contractor or service provider;
5. interact with Kairos in relation to IT support, governance, service management, cybersecurity or related services;
6. submit a POPIA, PAIA or privacy-related request.

1.1.3 This Privacy Notice should be read together with the Kairos PAIA Manual and Kairos Website Terms and Conditions.

2. Kairos Details

2.1 Organisation Details

Item	Detail
Organisation	Kairos Computer Risk Management
Registration Number	2009/034954/23
Website	https://kairoscrm.co.za
Main Contact Email	info@kairoscrm.co.za
Telephone	0215197116
Address	First Floor, Constantia Emporium, c/o Ladies Mile Road and Spaanschemat River Road, Constantia, Cape Town, South Africa, 7806

2.2 Information Officer Details

Role	Detail
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Information Officer	Gary Grant Adams
Title	CTIO
PAIA / POPIA Email	informationofficer@kairoscrm.co.za
Telephone	0215197116

3. Scope of this Privacy Notice

3.1 Website and Business Processing

3.1.1 This Privacy Notice applies to personal information processed by Kairos through its website and normal business operations.

3.1.2 This may include personal information relating to clients, client representatives, suppliers, contractors, website visitors, people making enquiries, employees, job applicants and users supported in client environments.

3.2 Kairos as Responsible Party and Operator

3.2.1 Kairos may process personal information as a Responsible Party where Kairos determines the purpose and means of processing. This may include processing for Kairos' own business operations, client administration, billing, supplier management, staff administration, marketing, governance, security and compliance.

3.2.2 Kairos may also process personal information as an Operator where Kairos processes personal information on behalf of a client Responsible Party. In those cases, Kairos processes personal information according to the client's documented instructions, applicable agreements and POPIA requirements.

4. Personal Information We May Collect

4.1 General Personal Information

4.1.1 Kairos may collect or process the following categories of personal information where lawful, necessary and relevant:

1. names and surnames;
2. business contact details;
3. email addresses and telephone numbers;
4. company or organisation details;
5. job titles and roles;
6. enquiry details;



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7. quotation, invoice, billing and payment-related information;
8. supplier and contractor information;
9. correspondence and communication records;
10. support ticket information;
11. service desk records;
12. device, endpoint, system and account information;
13. logs, audit records and security event information;
14. information contained in documents submitted to Kairos;
15. information required for POPIA, PAIA, governance, contractual or legal purposes.

4.2 Website Information

4.2.1 When you use the Kairos website, Kairos may process technical or usage information such as:

1. IP address;
2. browser and device information;
3. pages visited;
4. date and time of access;
5. referring website or source;
6. information submitted through website forms;
7. cookie or analytics information where applicable.

4.2.2 The specific cookies, analytics tools, embedded content and website technologies used by the Kairos website must be verified before publication.

4.3 Special Personal Information and Children's Information

4.3.1 Kairos does not intentionally collect special personal information or children's information through the website unless it is lawful, necessary and authorised.

4.3.2 If you voluntarily submit special personal information or children's information to Kairos, Kairos will process it only where lawful, appropriate and necessary for the relevant purpose.

5. How We Collect Personal Information

5.1 Sources of Personal Information

5.1.1 Kairos may collect personal information directly from you when you:

1. submit a website enquiry;

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2. email or call Kairos;
3. request a quotation;
4. request IT support;
5. enter into a client, supplier or contractor relationship with Kairos;
6. submit documents or information to Kairos;
7. communicate with Kairos through business channels;
8. submit a PAIA, POPIA or data subject request.

5.1.2 Kairos may also receive personal information from:

1. client Responsible Parties;
2. authorised client representatives;
3. suppliers and service providers;
4. contractors;
5. cloud, security, support and communication platforms;
6. public sources where lawful and relevant;
7. professional advisers or authorities where legally permitted.

6. Why We Process Personal Information

6.1 Purposes of Processing

6.1.1 Kairos may process personal information for legitimate business, operational, legal, security and service-related purposes, including:

1. responding to enquiries;
2. preparing quotations and proposals;
3. delivering IT services;
4. providing helpdesk, support and managed services;
5. supporting client systems and client environments;
6. managing client relationships;
7. managing supplier and contractor relationships;
8. billing, invoicing and payment administration;
9. governance consulting and service management;



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10. cybersecurity support and security incident response;
11. identity, access and account administration where authorised;
12. recordkeeping and audit purposes;
13. compliance with POPIA, PAIA and other applicable legal obligations;
14. managing data subject requests;
15. handling complaints, disputes or legal matters;
16. maintaining website functionality, security and performance;
17. sending service communications, security notices, business updates or marketing communications where lawful.

7. Lawful Basis for Processing

7.1 Lawful Processing

7.1.1 Kairos processes personal information only where there is a lawful and legitimate basis to do so.

7.1.2 Depending on the context, Kairos may process personal information where:

1. you have consented;
2. processing is necessary to perform or enter into a contract;
3. processing is necessary for compliance with a legal obligation;
4. processing protects a legitimate interest of Kairos, a client or another party;
5. processing is necessary for the proper performance of a public law duty by a public body, where applicable;
6. processing is required in terms of a client instruction where Kairos acts as Operator.

8. Sharing of Personal Information

8.1 Recipients of Personal Information

8.1.1 Kairos may share personal information only where lawful, necessary and appropriate.

8.1.2 Personal information may be shared with:

1. authorised Kairos employees, contractors and consultants;
2. clients and authorised client representatives;
3. service providers, operators and sub-operators;
4. cloud, email, backup, cybersecurity, support and business system providers;
5. payment, accounting, finance or administrative service providers;



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- 6. professional advisers, auditors or legal advisers;
- 7. regulatory authorities or law enforcement bodies where required or permitted by law;
- 8. other parties where necessary for the relevant service, contract, instruction, legal obligation or legitimate business purpose.

8.1.3 Kairos does not sell personal information.

9. Client Information and Operator Processing

9.1 Processing on Behalf of Clients

9.1.1 Where Kairos processes personal information on behalf of a client, the client remains the Responsible Party unless otherwise agreed or required by law.

9.1.2 Kairos will process client personal information only in accordance with the client's documented instructions, applicable agreements, service scope and lawful requirements.

9.1.3 Kairos may assist client Responsible Parties with access, correction, deletion, objection, security incident and related data protection requests where required by contract, law or documented instruction.

10. Cross-Border Transfers

10.1 Storage or Processing Outside South Africa

10.1.1 Personal information may be stored, accessed or processed outside South Africa where Kairos uses cloud services, email platforms, security tools, backup platforms, support systems or other authorised services.

10.1.2 Where personal information is transferred outside South Africa, Kairos will take reasonable steps to ensure that appropriate safeguards, contractual protections, client instructions or lawful transfer mechanisms are in place where required.

10.1.3 Kairos is formalising a Cross-Border Transfer Register to support client and operator due diligence requirements.

11. Security Safeguards

11.1 Protection of Personal Information

11.1.1 Kairos implements reasonable technical and organisational safeguards to protect personal information against unauthorised access, loss, damage, misuse, alteration, disclosure or destruction.

11.1.2 These safeguards may include:

- 1. access control;
- 2. least privilege;
- 3. multi-factor authentication where appropriate;



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- 4. endpoint protection;
- 5. secure configuration;
- 6. backup and recovery controls;
- 7. incident response procedures;
- 8. physical security;
- 9. acceptable use controls;
- 10. confidentiality obligations;
- 11. supplier and third-party controls;
- 12. staff awareness and governance measures.

11.1.3 Kairos does not publicly disclose detailed internal security architecture, technical configurations or client security information.

12. Cookies and Website Analytics

12.1 Cookies and Similar Technologies

12.1.1 The Kairos website may use cookies, analytics tools, security tools, embedded content or similar technologies to support website functionality, security, performance, user experience and website usage analysis.

12.1.2 Cookies may include essential cookies, functionality cookies, analytics cookies, embedded content cookies or marketing cookies where applicable.

12.1.3 The specific cookies and similar technologies used by the Kairos website must be verified before publication.

12.1.4 Where required, Kairos will provide appropriate notice and, where applicable, obtain consent through a cookie banner, cookie notice or browser-based settings.

12.1.5 A separate Kairos Cookie Notice may be published where appropriate.

13. Retention of Personal Information

13.1 Retention Principles

13.1.1 Kairos will not retain personal information for longer than necessary for the purpose for which it was collected, unless retention is required or permitted by law, contract, legitimate business need, audit requirement, dispute management or approved retention schedule.

13.1.2 Retention periods may differ depending on the type of record, legal requirements, contract requirements, client instructions, service relationship, security need or business purpose.



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13.2 Secure Deletion

13.2.1 Where personal information is no longer required, Kairos will take reasonable steps to delete, destroy, de-identify or archive the information securely, subject to legal, contractual, operational and backup retention requirements.

14. Your Rights

14.1 Data Subject Rights

14.1.1 Subject to applicable law, you may have the right to:

1. ask whether Kairos holds your personal information;
2. request access to your personal information;
3. request correction of inaccurate, outdated, incomplete or misleading personal information;
4. request deletion or destruction of personal information where legally permitted;
5. object to processing in certain circumstances;
6. withdraw consent where processing is based on consent;
7. submit a complaint regarding the processing of your personal information.

14.2 Requests Relating to Client Data

14.2.1 Where Kairos processes personal information as Operator for a client, Kairos may need to refer your request to the relevant client Responsible Party.

14.2.2 Kairos will assist the client Responsible Party according to documented instructions, applicable agreements and lawful requirements.

15. PAIA and Access to Records

15.1 Access to Records

15.1.1 Requests for access to records held by Kairos may be handled under PAIA, POPIA or both, depending on the nature of the request.

15.1.2 Requesters should refer to the Kairos PAIA Manual for information on how to request access to records, the categories of records held by Kairos, possible grounds for refusal, fees and complaint routes.

16. Security Compromises and Incidents

16.1 Incident Handling

16.1.1 Kairos maintains internal processes for reporting, assessing, containing, investigating and responding to suspected or confirmed personal information incidents.



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16.1.2 Where Kairos acts as Responsible Party, Kairos will assess whether notification to the Information Regulator and affected data subjects is required.

16.1.3 Where Kairos acts as Operator, Kairos will notify and support the relevant client Responsible Party in accordance with applicable agreements, documented instructions and legal requirements.

17. Direct Marketing and Communications

17.1 Service and Business Communications

17.1.1 Kairos may communicate with you electronically for business, administrative, service, support, security, billing, legal, governance or relationship-related purposes.

17.1.2 These communications may be necessary for the relevant relationship or transaction and may not always be optional.

17.2 Optional Marketing Communications

17.2.1 Kairos may send newsletters, service updates, event invitations, security advisories or marketing communications where lawful.

17.2.2 You may unsubscribe from non-essential electronic marketing communications using the unsubscribe method provided or by contacting Kairos.

18. Third-Party Websites and Services

18.1 External Platforms

18.1.1 The Kairos website or communications may contain links to third-party websites, platforms or services.

18.1.2 Kairos is not responsible for the privacy practices, security, content, terms or availability of third-party websites or services.

18.1.3 Users should review the applicable third-party privacy notices and terms before using third-party platforms or services.

19. Complaints

19.1 Contact Kairos First

19.1.1 If you have a privacy concern, POPIA request or complaint, you may contact the Kairos Information Officer using the details below:

Information Officer: Gary Grant Adams

Title: CTIO

Email: informationofficer@kairoscrm.co.za



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Telephone: 0215197116

19.2 Information Regulator

19.2.1 You may also contact the Information Regulator if you are not satisfied with how your personal information or access-to-information request has been handled.

Information Regulator Website: <https://inforegulator.org.za>

General Email: enquiries@inforegulator.org.za

PAIA Complaints: PAIAComplaints@inforegulator.org.za

POPIA Complaints: POPIAComplaints@inforegulator.org.za

20. Updates to this Privacy Notice

20.1 Review and Changes

20.1.1 Kairos may update this Privacy Notice from time to time to reflect changes in law, business operations, website functionality, systems, services, processing activities or governance requirements.

20.1.2 The updated version will be made available on the Kairos website or through another reasonable public access channel.

21. Contact Information

21.1 Organisation contact details

Kairos Computer Risk Management

First Floor, Constantia Emporium

c/o Ladies Mile Road and Spaanschemat River Road

Constantia, Cape Town

South Africa

7806

Telephone: 0215197116

Website: <https://kairoscrm.co.za>

General enquiries: info@kairoscrm.co.za

PAIA / POPIA requests: informationofficer@kairoscrm.co.za

Security reporting: cybersecurity@kairoscrm.co.za

Support enquiries: support@kairoscrm.co.za

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22. Related Documents

22.1 Related documents

This Privacy Notice should be read together with the following Kairos documents, where applicable:

1. Kairos PAIA Manual;
2. Kairos Website Terms and Conditions.