

CLIENT PRIVACY NOTICE

Elite Accounting and Tax Solutions CC

In terms of section 18 of the Protection of Personal Information Act 4 of 2013 (POPIA) · Version 2.0 · Effective date: 19 October 2026

This notice explains how Elite Accounting and Tax Solutions CC ("the Practice", "we", "us") collects, uses, shares and protects the personal information of our clients and of the people connected to them, such as directors, members, shareholders, beneficial owners, spouses, dependants and employees of our clients.

Under section 1 of POPIA, personal information includes information about an identifiable, existing juristic person, such as a company or close corporation. This notice therefore also applies to the information of clients that are companies, close corporations and other entities, including their registration, tax and VAT numbers, bank details and financial records, which we protect in the same way as information about individuals.

1. Who we are

- Elite Accounting and Tax Solutions CC (registration number 2009/084706/23)
- Information Officer: Caroline Scopetti (Information Regulator registration no. 2026-068820, registered 9 October 2026)
- Physical address: 34 Boslelie Crescent, Clearwater Estate, Parkhaven Ext 3, Boksburg, 1459
- Postal address: PO Box 7151, Bonaero Park, 1622
- Telephone: 083 483 7661 (the office WhatsApp is on the same number)
- Email: office@elite-accounting.co.za
- Website: www.elite-accounting.co.za

For any privacy request, please contact our Information Officer using the details above.

2. What personal information we collect

- Identity information: names, identity or passport numbers, dates of birth, nationality and marital status;
- Contact information: physical and postal addresses, telephone numbers and email addresses;
- Tax information: income tax, VAT, PAYE and other tax reference numbers, returns, assessments and SARS correspondence;
- Financial information: bank details and statements, income, expenses, assets, liabilities, investments, retirement fund and insurance information;
- Information about spouses and dependants, to the extent needed for tax purposes;
- Medical aid information and medical expenses, and disability information, only where needed to claim tax deductions or credits;
- Payroll information about our clients' employees: names, identity numbers, tax numbers, remuneration, leave, bank details and UIF information;
- Company information: CIPC records, details of directors, members, shareholders and beneficial owners; and
- Information required for client verification and screening under the Financial Intelligence Centre Act.

Elite Accounting and Tax Solutions CC

Reg. No. 2009/084706/23 | VAT No. 4740308954

Caroline Scopetti · Chartered Business Accountant in Practice · CIBA No. CIBA201210-1172
Tax Practitioner · SAIT Member No. 18155880 · SARS Practitioner No. PR-0005114



3. Where we get it

- Directly from you, or from your business when you engage us;
- From SARS eFiling, CIPC and other public or official sources, using the mandates you give us;
- From your bank, employer, medical aid, retirement fund or other third parties who issue tax certificates to you; and
- From your accountant or adviser, if you transfer to us from another practice.

4. Why we use it

- To provide the accounting, bookkeeping, payroll, tax and company secretarial services you engage us for;
- To prepare and submit returns, declarations and other documents to SARS, CIPC, the Department of Employment and Labour and other authorities on your behalf;
- To verify your identity and that of your beneficial owners, assess risk, and screen against sanctions lists, as required by the Financial Intelligence Centre Act;
- To comply with our obligations under tax, company, labour and professional legislation and the rules of our professional bodies (CIBA and SAIT);
- To invoice you and manage our relationship with you; and
- To communicate with you about your affairs and about deadlines and changes in law that affect you.

5. Special personal information

Health and disability information is special personal information. We process it only where needed to claim tax deductions or credits on your behalf, with your consent or as permitted by section 27 of POPIA.

6. Is providing the information voluntary?

Some of the information is required by law, for example under the Financial Intelligence Centre Act and tax legislation, and the rest is needed to render our services. If you do not provide it, we may be unable to accept or continue the engagement, or to submit your returns correctly and on time, which may result in penalties or interest from SARS.

7. Laws that require or authorise collection

- Financial Intelligence Centre Act 38 of 2001;
- Income Tax Act 58 of 1962, Value-Added Tax Act 89 of 1991 and Tax Administration Act 28 of 2011;
- Companies Act 71 of 2008 and Close Corporations Act 69 of 1984;
- Basic Conditions of Employment Act 75 of 1997, Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002; and
- Skills Development Levies Act 9 of 1999.

8. Who we share it with

Recipient	Reason
SARS	Submission of tax returns, declarations, IRP5 certificates and correspondence on your behalf (eFiling and e@syFile)
CIPC	Company and close corporation filings, annual returns and beneficial ownership (CIPC eServices and BizPortal)
Department of Employment and Labour	UIF declarations (uFiling) and Compensation Fund returns of earnings
Rand Mutual Assurance (RMA)	Returns of earnings and claims for compensation for occupational injuries, for clients registered with RMA
Financial Intelligence Centre	Reports required by law
Professional bodies (CIBA, SAIT)	Practice reviews or disciplinary matters, where required
Software and IT service providers	Hosting and processing data on our behalf, under confidentiality obligations
Banks, auditors or other parties	Only on your instruction or with your consent
Courts, law enforcement and regulators	Where required by law

We do not sell your personal information, and we do not use it for third-party marketing.

9. Transfers outside South Africa

We use cloud-based services to store and process information, including Sage Business Cloud Accounting, Sage 200 Evolution (installed on Practice computers), Sage Payroll (including Sage Business Cloud Payroll Professional), SARS eFiling, SARS e@syFile, Win Tax (tax practice software), DraftWorx (annual financial statements), Microsoft 365 (Outlook, OneDrive and Teams), Microsoft Quick Assist, Google (Gmail and Chrome Remote Desktop), TeamViewer, AnyDesk and UltraViewer (remote support sessions by software consultants, for example for Sage 200 Evolution, opened only with the Practice's permission and attended for the whole session), Zoom (online meetings), MWEB (email), Afrihost (Practice email accounts, including office@elite-accounting.co.za), WhatsApp, Dropbox, Infodocs, AutoEntry, Bitwarden, Adobe Acrobat (PDF editing, document sharing and electronic signatures), and Anthropic (Claude, an AI assistant we use to help prepare documents and review records). Some of these providers store data on servers outside South Africa. We use only reputable providers that are subject to laws, binding corporate rules or agreements that provide an adequate level of protection, as required by section 72 of POPIA.

We also submit information on your behalf through official online systems: SARS eFiling and e@syFile (including IRP5 and EMP501 reconciliations), CIPC eServices and BizPortal, the Department of Employment and Labour's uFiling (UIF) and Compensation Fund online systems, and Rand Mutual Assurance (RMA) for clients registered with it for compensation for occupational injuries. These bodies receive the information for their own legal functions.

10. How we protect it

- Access is limited to staff who need the information to do their work, and every staff member is bound by confidentiality in their contract of employment;
- Systems are protected by individual logins and passwords managed through a password manager;
- Electronic records are stored on secure cloud platforms with access controls and backed up to a second, separate location, including encrypted external hard drives kept securely at the Practice;
- Practice laptops are used only for Practice work. They are password-protected, connect only to the employee's own password-protected home Wi-Fi or own mobile hotspot (never to open or public Wi-Fi), store client files only in Sage, the Practice's OneDrive (including the laptop Desktop and Documents folders, which synchronise to it) and the Practice's shared Dropbox folder, and may be inspected, monitored and remotely accessed by the Practice, under our Work From Home and Company Laptop Policy;
- Staff may use internet searches and AI tools only for general questions and item or exchange-rate searches, never with your name, other names or identifying details, and never by uploading your documents;
- Original documents taken home by staff for authorised work are kept secure, returned to the office on the next office day and never photographed with personal devices;
- Staff may communicate with you only through their Practice email address, the office WhatsApp number and the office business phone, and never from a personal phone or personal email;
- Client documents and messages received on the office WhatsApp, on the Information Officer's own WhatsApp and email accounts (Outlook, Gmail and MWEB), and on other mobile devices used for Practice purposes, are saved to the Practice's files where they form part of the client's records. WhatsApp chats and emails with clients are kept as a reference record for as long as the client relationship continues and thereafter for as long as they are reasonably required (see section 11). WhatsApp chat backups are end-to-end encrypted. These devices are protected by a PIN or biometric lock and can be located and wiped remotely if lost or stolen; and
- If we believe your personal information has been accessed or acquired by an unauthorised person, we will notify you and the Information Regulator as required by section 22 of POPIA.

11. How long we keep it

We keep client records, including documents and messages you send us by email or WhatsApp, for as long as the engagement continues and thereafter for at least the periods required by law, which is generally five years under section 29 of the Tax Administration Act and sections 22 and 23 of the Financial Intelligence Centre Act.

We may keep records, in particular emails and WhatsApp messages, for longer where they are reasonably required to deal with enquiries, audits, assessments, disputes or claims by SARS, the Department of Employment and Labour, you or others, which can arise many years after the work was done (section 14(1)(b) of POPIA). We review older records each year and securely destroy or delete them when they are no longer reasonably required.

12. Your rights

Under POPIA you have the right to:

- request confirmation of whether we hold personal information about you, and access to it;

- ask us to correct or delete personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully;
- ask us to destroy or delete personal information we are no longer authorised to keep;
- object, on reasonable grounds, to the processing of your personal information, and object to processing for direct marketing at any time;
- withdraw your consent where processing is based on consent (this does not affect processing that took place before withdrawal, or processing required by law); and
- lodge a complaint with the Information Regulator.

In line with the POPIA Regulations, as amended with effect from 17 April 2025:

- you can exercise these rights free of charge, in writing, by email or by telephone, using the details in section 1; and
- we will respond to requests for correction or deletion of your personal information within 30 days.

If you ask for copies of records, the reproduction fees prescribed under the Promotion of Access to Information Act may apply, as set out in our PAIA Manual, which is available on our website and at our office.

13. Complaints

If you are not satisfied with how we handle your personal information, please contact our Information Officer first. You may also lodge a complaint with the Information Regulator:

Information Regulator (South Africa)	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 • Toll free 0800 017 160
Email	enquiries@inforegulator.org.za
Complaints	inforegulator.org.za/complaints

14. Changes to this notice

We may update this notice from time to time. The latest version is available on our website or on request.

Legal references

Law	Relevance to this notice
Protection of Personal Information Act 4 of 2013	Section 1 (personal information includes juristic persons), section 18 (notice), sections 19 to 22 (security), sections 23 to 25 (data subject rights), section 27 (special personal information), section 72 (transfers)
Financial Intelligence Centre Act 38 of 2001	Sections 21 to 24: client due diligence and record-keeping
Tax Administration Act 28 of 2011	Section 29: retention of tax records

Law	Relevance to this notice
Promotion of Access to Information Act 2 of 2000	Access to records and fees (see our PAIA Manual)
Information Regulator	Complaints and guidance

Acknowledgement

I confirm that I have read and understood this notice.

Name: _____

Signature: _____

Date: _____