

PRIVACY POLICY

Last updated 12 September 2026

Responsible party: RVZ International Group (Pty) Ltd
Registration: 2023/905207/07
Policy reference: POL-DATA-01
Governing law: Protection of Personal Information Act 4 of 2013

RVZ International Group (Pty) Ltd ("RVZ", "we", "us", "our") is a South African multi-industry group operating through the divisions RVZ Marketing & Design, RVZ Personnel Services, RVZ Events & Functions, RVZ Productions, RVZ Travel, RVZ Business Solutions and the RVZ Shop. We are the responsible party, as defined in section 1 of the Protection of Personal Information Act 4 of 2013 ("POPIA"), for the personal information described in this policy.

This policy is the notification we are required to give you under POPIA section 18. It explains what personal information we collect, where we get it from, why and on what lawful basis we process it, who we share it with, whether it leaves South Africa, how long we keep it, how we protect it, and the rights you have and how to exercise them. It applies to rvzgroup.co.za, shop.rvzgroup.co.za, our client, vendor and staff portals, our recruitment services, and every other way you deal with us.

1. Information Officer

1.1 Under POPIA section 55, read with section 1 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), the head of a private body is its Information Officer. RVZ's Information Officer is its Chief Executive Officer, Ryan Massey-Hicks. The Information Officer is responsible for encouraging and ensuring RVZ's compliance with POPIA, dealing with requests made under POPIA and PAIA, and working with the Information Regulator in any investigation.

1.2 Requests, questions and complaints about your personal information should be addressed to the Information Officer at ryan@rvzgroup.co.za, or in writing to RVZ International Group (Pty) Ltd, Habersfeld Street, Klissersville, Kimberley, Northern Cape 8301. General enquiries may also be sent to info@rvzgroup.co.za.

2. Personal information we process

2.1 Depending on how you deal with us, we may process the following categories of personal information:

- Identity and contact details: name, title, company and position, postal and email address, telephone and WhatsApp numbers.
- Enquiry, booking and service details: the division you contact, appointment dates and times, event details (dates, venues, guest numbers, dietary and accessibility requirements), travel details (traveller names as they appear on identity documents, dates of birth, passport numbers and expiry dates, routes, preferences), creative briefs, and any other information you give us so that we can provide a service.
- Transaction and account details: quotations, orders, invoices, payment status and history, delivery addresses, VAT and purchase-order numbers, and client, vendor or portal account credentials and activity logs.
- Payment information: the amount, date and reference of a payment. Card details are captured and processed by our payment provider (currently Paystack) on its own PCI DSS-compliant systems; RVZ

never receives or stores your full card number, CVV or PIN.

- Recruitment and placement information: described separately in section 7.
- Communications: emails, messages, web-form submissions, and telephone calls and messages that may be recorded or logged as described in our Communications and Call Recording Notice .
- Marketing preferences: your newsletter subscription status, consents and opt-outs.
- Technical information: IP address, browser and device type, pages visited and referring site, collected through cookies and similar technologies described in section 16 and in our Cookie Policy .
- Compliance and reporting information: information you provide when making a whistleblowing report, grievance or complaint, or when applying to become a vendor.

2.2 Where a field is mandatory we tell you so on the form. Providing information that is not mandatory is voluntary; if you choose not to provide mandatory information we may be unable to respond to you or provide the service you have asked for (POPIA section 18(1)(d) and (e)).

3. Where we get it from

3.1 In accordance with POPIA section 12 we collect personal information directly from you wherever reasonably possible — through our website forms, portals, email, telephone, WhatsApp, in person, or the documents you give us.

3.2 We collect information from other sources only where section 12(2) permits it, for example: from a client employer when it briefs us on a vacancy; from a referee you have nominated; from public sources such as CIPC or a professional register; from a travel supplier or venue in the course of managing your booking; from our payment provider to confirm a payment; or where you have consented.

4. Why we process it, and on what lawful basis

4.1 POPIA section 13 requires us to collect personal information only for a specific, explicitly defined and lawful purpose related to our functions, and section 11 requires each processing activity to rest on one of the lawful grounds in section 11(1). The table below sets these out.

Purpose Lawful basis (POPIA s 11(1))
Responding to an enquiry, providing a quotation, and providing the goods or services you request Lawful basis (POPIA s 11(1)) Necessary to conclude or perform a contract to which you are a party (s 11(1)(b))
Managing bookings, events, travel arrangements and creative projects, including sharing details with venues, suppliers and fulfilment partners Lawful basis (POPIA s 11(1)) Contract performance (s 11(1)(b)); our and your legitimate interests (s 11(1)(f))
Processing payments, issuing invoices and statements, credit control and debt recovery Lawful basis (POPIA s 11(1)) Contract performance (s 11(1)(b)); compliance with the Tax Administration Act, VAT Act and Companies Act (s 11(1)(c))
Recruitment, candidate assessment and placement Lawful basis (POPIA s 11(1)) Steps at your request before a contract (s 11(1)(b)); consent for checks that require it (s 11(1)(a)); compliance with the Employment Services Act (s 11(1)(c))
Operating client, vendor and staff portals, and keeping accounts secure Lawful basis (POPIA s 11(1)) Contract performance (s 11(1)(b)); legitimate interests in security (s 11(1)(f))

Sending our newsletter and marketing communications

Lawful basis (POPIA s 11(1))

Consent (s 11(1)(a)), or the existing-customer basis in s 69(3) with an opt-out in every message

Investigating and resolving complaints, grievances and whistleblowing reports

Lawful basis (POPIA s 11(1))

Legitimate interests (s 11(1)(f)); legal obligations under the CPA and Protected Disclosures Act (s 11(1)(c))

Recording calls and messages for quality, training, dispute resolution and evidence of transactions

Lawful basis (POPIA s 11(1))

Legitimate interests (s 11(1)(f)); RICA s 4–6 where a party to the call records it

Complying with legal obligations, including tax, company-law, health-and-safety, labour and accounting record-keeping

Lawful basis (POPIA s 11(1))

Legal obligation (s 11(1)(c))

Website analytics and improvement

Lawful basis (POPIA s 11(1))

Consent to non-essential cookies (s 11(1)(a)); legitimate interests in essential operation (s 11(1)(f))

Establishing, exercising or defending legal claims; preventing fraud

Lawful basis (POPIA s 11(1))

Legitimate interests (s 11(1)(f))

4.2 Where we rely on our legitimate interests, we have assessed that those interests are not overridden by your rights, and you may object under section 11(3) — see section 17 below.

4.3 We do not process personal information for a purpose incompatible with the purpose for which it was collected, unless POPIA section 15 permits it (for example, with your consent, or where the further processing is required by law). Candidate information is never used for unrelated marketing.

4.4 We take reasonably practicable steps to keep personal information complete, accurate, not misleading and up to date, as section 16 requires. Please tell us if your details change.

5. Special personal information

5.1 "Special personal information" (POPIA section 26) includes information about your religious or philosophical beliefs, race or ethnic origin, trade-union membership, political persuasion, health or sex life, biometric information, and criminal behaviour. We process it only where one of the authorisations in sections 27 to 33 applies — most commonly your explicit consent, or where the processing is necessary for the establishment, exercise or defence of a right or obligation in law.

5.2 Examples in our business: dietary or accessibility requirements you give us for an event (health, processed with your consent to accommodate you); passport nationality and date of birth for travel (processed as necessary for the booking); race and gender information reported under the Employment Equity Act where we are a designated employer (section 27(1)(b)); and criminal-record or health checks in recruitment, only where lawful, relevant, proportionate and specifically authorised by you (see section 7).

6. Children

6.1 Our services are directed at adults and businesses. Under POPIA section 34 we do not process the personal information of a child (a person under 18) unless section 35 applies — principally, with the prior consent of a competent person (a parent or guardian). Where a client provides us with a child's details for an event or travel booking, the client warrants that it has that consent.

6.2 If you believe we have collected a child's information without appropriate consent, please contact the

Information Officer and we will delete it.

7. Recruitment and labour-hiring data

7.1 RVZ Personnel Services processes candidate and placed-worker information as a private employment service under the Employment Services Act 4 of 2014 and, for labour hiring, as an employer under section 198 of the Labour Relations Act 66 of 1995. Some recruitment functions are delivered through our related job platform at nhestate.co.za, which publishes its own privacy notice.

7.2 Candidate information may include your CV, identity number, qualifications, employment history, references, right-to-work documents, and remuneration expectations. Criminal-record, credit, qualification-verification, medical or social-media checks are performed only where lawful, relevant to the role, proportionate, and specifically authorised by you in writing, and a check report records its source and scope.

7.3 Your information is shared with a prospective employer only for a specific vacancy, only with the decision-makers for that vacancy, and only after you have agreed to be put forward. Our client agreements prohibit the client from adding you to marketing lists or retaining your details beyond the recruitment purpose.

7.4 We do not charge work seekers any fee, and we do not sell candidate data.

7.5 For placed workers, payroll, tax, UIF, COIDA, time and attendance, and health and safety records are processed as required by the Basic Conditions of Employment Act, the Income Tax Act, the Unemployment Insurance Act, COIDA and the Occupational Health and Safety Act, and are retained for the periods those Acts prescribe.

8. Who we share it with

8.1 We do not sell personal information. We share it only as described here, only to the extent necessary, and under confidentiality obligations.

- Within RVZ: between divisions where you have asked for a service that spans more than one, and with the staff who need it to do their work, under role-based access.
- Service providers (operators): described in section 9.
- Suppliers involved in your service: venues, caterers and event suppliers; airlines, accommodation, transport and tour operators, and travel insurers; the print-on-demand fulfilment partner for RVZ Shop orders; distributors and collecting societies for music releases. Each receives only the information needed for its part of your service.
- Prospective employers: for candidates, as described in section 7.
- Professional advisers: our attorneys, accountants, auditors and insurers, under professional duties of confidentiality.
- Regulators and authorities: SARS, the Department of Employment and Labour, the Compensation Fund, the CIPC, the Information Regulator, the National Consumer Commission, a court or law-enforcement agency, where the law requires or permits disclosure.
- A successor: if RVZ or a division is sold, merged or restructured, to the acquirer, provided the same safeguards continue and you are notified where the law requires.

9. Operators processing on our behalf

9.1 An "operator" (POPIA section 1) processes personal information for us under our instructions. Section 20 requires an operator to process only with our authorisation and to keep the information confidential, and section 21 requires us to have a written contract with each operator requiring it to maintain appropriate security safeguards and to notify us immediately of any suspected security compromise. Our operators include:

- our web-hosting provider (Xneelo, South Africa), which hosts this website, our portals and our databases;
- our payment provider (Paystack), which processes card and instant-EFT payments;
- our transactional and newsletter email service;

- the print-on-demand fulfilment partner for the RVZ Shop, which receives your name, delivery address and order to manufacture and ship it;
- Google (Analytics and Tag Manager) for website analytics, where you have consented to analytics cookies;
- cloud productivity, storage and collaboration tools used by our staff.

9.2 We assess each operator's security before appointing it, and our operator agreements incorporate the POPIA Data-Processing Addendum in Annexure C of our Terms and Conditions.

10. Transfers outside South Africa

10.1 Some operators and suppliers process information outside South Africa — for example, our email and analytics providers, the print-on-demand fulfilment partner, and foreign airlines, hotels and tour operators for international travel.

10.2 POPIA section 72 permits a transfer only where the recipient is subject to a law, binding corporate rules or a binding agreement providing substantially similar protection to POPIA; or you consent; or the transfer is necessary to perform a contract with you or a contract in your interest; or it is for your benefit and consent is not reasonably practicable to obtain. We rely on binding agreements with our operators and, for travel and international orders, on the transfer being necessary to perform your contract. We do not transfer personal information abroad for any purpose beyond these.

11. How long we keep it

11.1 POPIA section 14 requires us not to retain personal information longer than is necessary to achieve the purpose for which it was collected, unless the law requires or authorises longer retention, we reasonably need it for a lawful purpose related to our functions, retention is required by contract, or you have consented. Our baseline periods are:

Record Baseline retention Basis
Enquiries that do not lead to a contract Baseline retention 24 months after last contact Basis Legitimate interest in follow-up and dispute resolution
Quotations, orders, invoices, statements and payment records Baseline retention At least 5 years after the end of the tax year, and 7 years for accounting records Basis Tax Administration Act 28 of 2011 s 29; Companies Act 71 of 2008 s 24 and Regulation 25
Contracts and statements of work Baseline retention Duration plus 7 years Basis Companies Act; prescription period for contractual claims
Client, vendor and portal account data Baseline retention Life of the account plus 5 years Basis Contract and dispute resolution
Unsuccessful candidate records Baseline retention 12 months after the vacancy closes, unless you ask us to keep your CV on file (then 24 months, renewable)

Basis
Employment Equity Act s 21 and Regulations; legitimate interest

Placed-worker employment, payroll and time records

Baseline retention
3 years after termination (BCEA s 31); 5 years for tax; longer where a dispute or COIDA claim exists

Basis
BCEA; Tax Administration Act; COIDA

Health and safety incident records

Baseline retention
Period prescribed for the record type under OHSA regulations; serious-incident files longer

Basis
Occupational Health and Safety Act

Complaints, grievances and whistleblowing reports

Baseline retention
5 years after closure

Basis
CPA Regulations; Protected Disclosures Act; dispute resolution

Marketing consents and suppression records

Baseline retention
For as long as the consent or opt-out is relied on, then 3 years as evidence

Basis
POPIA s 69; proof of compliance

Call recordings

Baseline retention
90 days, unless required for a dispute or legal hold

Basis
Legitimate interest; RICA

Website server logs

Baseline retention
90 days

Basis
Security and fraud prevention

11.2 Where a dispute, investigation, regulator enquiry or legal hold applies, the affected records are retained until it concludes. When a retention period ends we destroy, delete or de-identify the information in a manner that prevents its reconstruction, as section 14(4) and (5) require.

12. How we protect it

12.1 POPIA section 19 requires us to secure the integrity and confidentiality of personal information through appropriate, reasonable technical and organisational measures. Our measures include: encrypted connections (TLS) to all our websites and portals; role-based access to our administration and portal systems, with staff seeing only what their role requires; strong authentication and session controls; hashed password storage; server-side access restrictions on uploaded documents; regular backups; vendor security assessment; staff training; and the operator contracts described in section 9.

12.2 We periodically review these measures against identified risks and generally accepted information-security practices, and our internal Information Security policy (POL-TECH-01) is aligned to ISO/IEC 27001 as a voluntary framework.

13. Security compromises

13.1 If we have reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, POPIA section 22 requires us to notify the Information Regulator and you as soon as reasonably possible after discovery. Our notification will describe the possible consequences, the measures we are taking, what you can do to mitigate any harm, and, where known, the identity of the unauthorised person. Notification may be delayed only where a law-enforcement body or the Regulator determines that it would impede a criminal investigation.

13.2 Our operators are contractually required to notify us immediately of any suspected compromise so that we can meet this duty.

14. Direct marketing

14.1 We send electronic direct marketing (email, SMS, WhatsApp) only where POPIA section 69 permits: either you have consented, or you are an existing customer, your details were obtained in the context of a sale, the marketing relates to similar goods or services, and you were given a reasonable opportunity to object when your details were collected and in every message since.

14.2 If you are not yet a customer we may approach you for consent only once, and will not approach you again if you decline.

14.3 Every marketing message identifies RVZ and contains a simple, free unsubscribe. An opt-out is honoured without delay and recorded on a suppression list. You may also opt out at any time by emailing ryan@rvzgroup.co.za.

14.4 Telephonic and other direct marketing complies with the Consumer Protection Act, including the prohibited contact times in CPA Regulation 4, and with your right under CPA section 11 to pre-emptively block it. See our Consumer Protection and Service Delivery Policy.

15. Automated decision-making and AI

15.1 POPIA section 71 gives you the right not to be subject to a decision that has legal or similarly significant consequences for you and that is based solely on automated processing intended to profile you. RVZ does not make such decisions. Every consequential decision about a person — a hiring recommendation, a credit or payment-terms decision, a complaint outcome — is made or meaningfully reviewed by a person with authority to change it.

15.2 We use artificial-intelligence tools for limited internal purposes such as drafting marketing copy and content, always with human review before publication. Under our AI Usage Policy and POL-TECH-05, personal information, special personal information and confidential client material may not be entered into public AI services, and any material use of generative AI in a client deliverable is disclosed and approved.

16. Cookies and website analytics

16.1 Our websites use strictly necessary cookies to function (session and security cookies, your cookie-consent choice) and, only if you consent through our cookie banner, analytics cookies set by Google Analytics through Google Tag Manager to understand how the site is used. We implement Google Consent Mode so that no analytics or advertising storage is used until you consent, and you can withdraw consent at any time. Full details are in our Cookie Policy.

17. Your rights and how to exercise them

17.1 Under POPIA you have the right to:

- be notified that your personal information is being collected, and of any unauthorised access to it (sections 18 and 22);
- confirm, free of charge, whether we hold personal information about you, and to access a record or description of it, in the manner and subject to the fee provisions of section 23 and PAIA;

- request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained, and destruction or deletion of a record we are no longer authorised to retain (section 24);
- object, on reasonable grounds relating to your particular situation, to processing based on our or a third party's legitimate interests (section 11(3)), and to object at any time to processing for direct marketing (section 11(3)(b) and section 69);
- withdraw consent at any time where processing is based on consent, without affecting the lawfulness of processing before withdrawal (section 11(2)(b));
- not be subject to a decision based solely on automated processing (section 71);
- complain to the Information Regulator (section 74) and to institute civil proceedings (section 99).

17.2 To exercise a right, contact the Information Officer at ryan@rvzgroup.co.za. For access requests you may use Form 2 prescribed under the POPIA Regulations, and for objections Form 1; we will accept a clear written request in any form. We may ask you to verify your identity proportionately before acting. We respond within the periods POPIA and PAIA prescribe — ordinarily within 30 days — and if we refuse a request in whole or part we will give you written reasons and tell you how to challenge the decision.

17.3 A request for access to a record that is not your own personal information is dealt with under PAIA; see our PAIA Manual.

18. Complaints and the Information Regulator

18.1 If you are unhappy with how we have handled your personal information or a request, please raise it with the Information Officer first so that we can put it right. You are not obliged to do so before approaching the Regulator.

18.2 You may lodge a complaint with the Information Regulator (South Africa) under POPIA section 74:

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

Email: complaints.IR@justice.gov.za (complaints) | enquiries@inforegulator.org.za (enquiries)

Website: inforegulator.org.za

19. Changes to this policy

19.1 We review this policy at least annually and whenever our processing, systems, suppliers or the law change materially. The "last updated" date at the top of this page shows the current version. Where a change materially affects how we process your information we will notify you by email or a prominent notice on our website before it takes effect. Continued use of our services after that date constitutes acceptance of the updated policy, but does not affect any right you have already acquired.

20. Legal references

- Protection of Personal Information Act 4 of 2013 — Chapter 3 (conditions for lawful processing: accountability s 8; processing limitation ss 9–12; purpose specification ss 13–14; further processing limitation s 15; information quality s 16; openness ss 17–18; security safeguards ss 19–22; data subject participation ss 23–25); Part B of Chapter 3 (special personal information ss 26–33; children ss 34–35); Chapter 5 Part B (Information Officer ss 55–56); Chapter 8 (direct marketing s 69; automated decision-making s 71); Chapter 9 (transborder information flows s 72); Chapter 10 (enforcement ss 73–99); and the Regulations relating to the Protection of Personal Information, 2018.
- Promotion of Access to Information Act 2 of 2000 — requests for access to records, the private-body manual (s 51) and fees.
- Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002 (RICA) — sections 4 to 6, recording of communications by a party to them.
- Electronic Communications and Transactions Act 25 of 2002 — Chapter VIII (protection of personal information in electronic transactions) and s 45 (unsolicited communications).
- Consumer Protection Act 68 of 2008 — ss 11–12 (right to privacy and to restrict unwanted direct marketing) and Regulation 4.

- Cybercrimes Act 19 of 2020 — unlawful access, interception and interference with data; reporting duties.
- Employment Services Act 4 of 2014 , Labour Relations Act 66 of 1995 , Basic Conditions of Employment Act 75 of 1997 and Employment Equity Act 55 of 1998 — the lawful basis and retention periods for recruitment and employment records.
- Tax Administration Act 28 of 2011 , Value-Added Tax Act 89 of 1991 and Companies Act 71 of 2008 — financial record-keeping periods.
- Constitution of the Republic of South Africa, 1996 — section 14 (right to privacy).

This policy gives effect to RVZ's Protection of Personal Information and Privacy policy (POL-DATA-01) and reflects POPIA and the other legislation cited as at the date shown above. It is reviewed at least annually. It is not legal advice; if you require advice on your rights, consult a qualified South African attorney or the Information Regulator.

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