

ETSILE INFRASTRUCTURE

PRIVACY POLICY AND COOKIE POLICY

Effective Date: 01 March 2026

Last Updated: 08 September 2026

1. INTRODUCTION

ETSILE Infrastructure (Pty) Ltd (“ETSILE”, “we”, “us” or “our”) respects the privacy of persons who interact with us.

This Privacy Policy explains how ETSILE collects, uses, stores, protects and otherwise processes personal information obtained through:

- the ETSILE website;
- website enquiry forms;
- project enquiries;
- contractor enquiries;
- partnership enquiries;
- recruitment applications;
- email communications;
- telephone communications;
- business-development activities;
- events and meetings; and
- other lawful business interactions.

This Privacy Policy is intended to explain ETSILE’s approach to personal information in accordance with the **Protection of Personal Information Act 4 of 2013 (“POPIA”)**, where applicable, and other applicable South African law.

PART A — PRIVACY POLICY

2. RESPONSIBLE PARTY

For purposes of POPIA, the responsible party is:

ETSILE INFRASTRUCTURE (PTY) LTD

Registration Number: **2018/612483/07**

Physical Address: **7 Frere Rd, Vincent, KuGompo City, 5201**

Postal Address: **7 Frere Rd, Vincent, KuGompo City, 5201**

Telephone: **081 093 0491/043 783 9100**

Email: **info@etsileinfrastructure.co.za**

Information Officer: **Mbali Mbele**

Information Officer Email: **mbali@etsileinfrastructure.co.za**

3. PERSONAL INFORMATION WE MAY COLLECT

Depending on your interaction with ETSILE, we may collect:

Identification information

- name and surname;
- company name;
- job title;
- professional details;
- identification information where legitimately required.

Contact information

- email address;
- telephone number;
- physical address;
- postal address;
- business address.

Business information

- company details;
- project details;
- project location;
- project value;
- contractor information;
- professional credentials;
- procurement information;
- tender information;
- commercial information;
- partnership information.

Recruitment information

Where you apply for employment or an opportunity with ETSILE, we may collect:

- CVs;
 - employment history;
 - qualifications;
 - professional registrations;
 - references;
 - contact details;
 - information reasonably required for recruitment and employment processes.
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4. PURPOSES FOR WHICH INFORMATION IS COLLECTED

ETSILE may process personal information for purposes including:

- responding to enquiries;
- evaluating project opportunities;
- assessing business proposals;
- communicating with clients and prospective clients;
- managing commercial relationships;
- evaluating contractor opportunities;
- evaluating partnerships;
- responding to funding or infrastructure-related enquiries;
- recruitment;
- business administration;
- compliance;
- fraud prevention;
- cybersecurity;
- legal proceedings;
- record keeping;
- improving the Website;
- Website analytics;
- communicating relevant business information; and
- other lawful purposes connected with ETSILE's business.

ETSILE will not process personal information for purposes materially incompatible with the purpose for which it was collected unless permitted by law or otherwise appropriately authorised.

5. LEGAL BASIS FOR PROCESSING

ETSILE processes personal information only where there is a lawful basis to do so.

Depending on the circumstances, processing may be based on:

- consent;
- performance of a contract;
- taking steps at the request of a data subject prior to entering into a contract;
- compliance with a legal obligation;
- legitimate business interests;
- protection of rights;
- prevention of fraud or unlawful activity; or
- another lawful basis recognised by applicable law.

6. VOLUNTARY PROVISION OF INFORMATION

Where personal information is requested through a Website form, ETSILE will indicate where information is necessary to process an enquiry.

You may choose not to provide certain information.

However, failure to provide information that is reasonably necessary may prevent ETSILE from responding to an enquiry or providing a requested service.

7. MARKETING COMMUNICATIONS

Where required by law, ETSILE will obtain appropriate consent before sending direct electronic marketing communications.

You may request that ETSILE stop sending direct marketing communications at any time.

Every marketing communication will provide an appropriate mechanism for opting out where required.

8. DISCLOSURE TO THIRD PARTIES

ETSILE may disclose personal information where reasonably necessary to:

- service providers;

- professional advisers;
- legal advisers;
- auditors;
- technology providers;
- website hosting providers;
- recruitment service providers;
- project partners;
- contractors;
- clients;
- government authorities;
- regulatory authorities;
- law-enforcement authorities; or
- other parties where disclosure is permitted or required by law.

ETSILE will take reasonable steps to ensure that third parties processing personal information on ETSILE's behalf are subject to appropriate confidentiality and data-protection obligations.

9. INTERNATIONAL TRANSFERS

Some technology, hosting, cloud-storage or service providers may process information outside South Africa.

Where personal information is transferred outside South Africa, ETSILE will take reasonable steps to ensure that the transfer is undertaken in accordance with applicable legal requirements.

10. RETENTION

ETSILE will retain personal information only for as long as reasonably necessary for the purpose for which it was collected, unless a longer retention period is required or permitted by law.

Retention periods may depend on:

- the nature of the information;
- the purpose for which it was collected;
- contractual requirements;
- legal requirements;
- regulatory requirements;

- dispute resolution requirements; and
 - legitimate business requirements.
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11. SECURITY

ETSILE will implement reasonable technical and organisational measures designed to protect personal information against:

- loss;
- damage;
- unauthorised access;
- unauthorised disclosure;
- unlawful processing;
- alteration;
- destruction; and
- other reasonably foreseeable risks.

Security measures may include access controls, authentication, secure hosting, backups, confidentiality obligations and other appropriate safeguards.

No electronic system can be guaranteed to be completely secure.

12. SECURITY COMPROMISES

Where required by applicable law, ETSILE will take appropriate steps following a security compromise, including assessment, containment, remediation and notification to relevant parties and/or the Information Regulator where legally required.

13. YOUR RIGHTS

Subject to applicable law, you may have rights to:

- request access to personal information held about you;
- request correction of inaccurate or incomplete information;
- request deletion of information where legally permissible;
- object to certain processing;
- object to direct marketing;
- withdraw consent where processing is based on consent;
- lodge a complaint concerning the processing of your personal information; and

- exercise other rights provided under applicable data-protection law.

Requests should be directed to the Information Officer.

14. VERIFICATION OF REQUESTS

For security purposes, ETSILE may take reasonable steps to verify the identity of a person making a request relating to personal information.

ETSILE will not request unnecessary sensitive information for verification.

15. CHILDREN'S INFORMATION

The Website is primarily directed at businesses, professionals, contractors, project stakeholders and other adults.

ETSILE does not intentionally collect personal information from children through the Website unless permitted by applicable law and subject to the required protections.

PART B — COOKIE POLICY

16. WHAT ARE COOKIES?

Cookies are small text files stored on a device when a website is accessed.

They may be used to enable website functionality, remember preferences, analyse website usage and improve user experience.

17. TYPES OF COOKIES

ETSILE may use:

Essential cookies

These are necessary for basic Website functionality, security and operation.

Functional cookies

These may remember user preferences and settings.

Analytics cookies

These may help ETSILE understand how visitors use the Website, including pages viewed, approximate usage patterns and technical information.

Marketing cookies

If used, these may help measure or personalise marketing activities.

ETSILE will implement appropriate consent mechanisms where required by law.

18. THIRD-PARTY TECHNOLOGIES

The Website may use third-party technologies such as:

- website analytics;
- embedded maps;
- video platforms;
- social media integrations;
- recruitment platforms;
- customer relationship management systems;
- contact-form providers; and
- security services.

Such providers may process information in accordance with their own privacy policies.

19. MANAGING COOKIES

Most modern browsers allow users to:

- block cookies;
- delete cookies;
- receive warnings when cookies are used; or
- manage cookie preferences.

Disabling certain cookies may affect Website functionality.

20. CHANGES TO THIS POLICY

ETSILE may amend this Privacy and Cookie Policy from time to time.

The updated version will be published on the Website with a revised “Last Updated” date.

21. CONTACT — PRIVACY MATTERS

For privacy-related questions, requests or complaints, contact:

Information Officer

ETSILE Infrastructure (Pty) Ltd

Email: mbali@etsileinfrastructure.co.za

Telephone: **081 093 0491**

Physical Address: **7 Frere Rd, Vincent, KuGompo City, 5201**

22. INFORMATION REGULATOR

Where appropriate, a data subject may lodge a complaint with the South African Information Regulator.

Information Regulator of South Africa

Website: www.inforegulator.org.za

Last Updated: 08 September 2026