MNA INVESTMENTS | BEE PROCURED V5

Privacy and POPIA Statement

How MNA Investments collects, uses, shares, stores and protects personal information in connection with BEE Procured V5.

Document	Details
Document code	BPV5-PRIV-01
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Jurisdiction	Republic of South Africa
Product owner	MNA Investments
Product	BEE Procured V5

Legal review and completion required. This product-specific draft replaces wording relating to the source company. MNA Investments must complete its full registered legal name, registration number, addresses and formal Information Officer details, and obtain South African legal review before adopting or signing the document.

BEE Procured V5 is procurement administration and reporting software. It does not issue B-BBEE verification certificates and does not replace an independent verification decision.

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This document must be read together with the applicable quotation, order form, package schedule, operator agreement and any signed addendum. If there is a conflict, the signed document with the most specific terms prevails.

1. Scope and POPIA roles

This Statement applies to the BEE Procured V5 website, verified demo and account-request forms, subscription platform, support desk and related communications operated by MNA Investments. It applies to visitors, prospects, client representatives, Authorised Users, suppliers, company contacts, certificate subjects, support participants and service providers whose personal information is processed through those services.

MNA Investments is the responsible party for information it collects for enquiries, marketing choices, account administration, billing, platform security, support and legal compliance. A client is generally the responsible party for supplier, employee, contact, procurement, certificate and company information uploaded to its own workspace. For that information, MNA Investments acts as operator under the client's lawful instructions, unless it independently determines a processing purpose.

2. Information collected

- Identity and contact data: names, usernames, work email addresses, telephone numbers, job titles and company details.
- Account and security data: roles, access levels, authentication, verification status, session, IP address, browser, device and audit events.
- Company and supplier data: names, registration numbers, trade names, addresses, contacts, industries and sector information.
- Procurement and B-BBEE business data: spend values, rating periods, enterprise type, ownership information, recognition data, link status and calculations.
- Evidence and review data: certificates, supporting documents, agency details, expiry dates, notes, approval, pre-screening and sampling history.
- Commercial and support data: package, quotation, billing, reminder preferences, tickets, replies, attachments and service history.
- Demo and registration data: verified work email, request details, evaluation criteria, approval and lifecycle status.

Users must not upload personal information that is excessive, irrelevant or not authorised for the business purpose. Identity documents, health information, criminal information and other special personal information should not be uploaded unless necessary, lawful and expressly approved.

3. Sources and purposes

Information is collected directly from a person, from an authorised representative or client, through use of the website and Service, from uploaded records, from public or lawfully accessible business sources, or from contracted service providers.

Purpose	Examples
Provide the Service	Create workspaces, capture procurement, link suppliers, store evidence, calculate and report
Manage access	Verify email, authenticate users, enforce roles, expire inactive sessions and audit activity
Support clients	Receive tickets, assign processors, communicate updates and meet response targets
Administer demos	Review genuine requests, provision Professional demos, restrict access and delete expired data
Operate the business	Quotations, subscriptions, invoicing, records, suppliers and professional advisers
Protect the platform	Detect abuse, investigate incidents, maintain backups and enforce terms

Purpose	Examples
Comply with law	Respond to lawful requests, exercise legal rights and retain required records

4. Lawful grounds and special information

Depending on context, processing is necessary to take requested pre-contractual steps, perform a contract, comply with law, pursue a legitimate business interest that does not override a person's rights, or act on consent where consent is required. Consent may be withdrawn, but withdrawal does not invalidate earlier lawful processing.

B-BBEE-related business records can contain information about race, gender or disability. The client must identify a lawful basis and authority for processing such information. MNA Investments processes it only as required for the authorised Service and agreed roles.

5. Sharing and operators

MNA Investments does not sell personal information. Information may be disclosed only as reasonably necessary to authorised MNA Investments personnel, authorised client users, contracted hosting, email, security and support providers, professional advisers, approved integration providers, verification agencies authorised by the client, regulators, courts or law-enforcement authorities where lawfully required.

Operators and service providers must process information for the agreed purpose, protect confidentiality and apply appropriate security. The client controls which of its users may view or change Client Data. Tenant controls are intended to prevent one client from accessing another client's workspace.

6. Cross-border processing

The location of hosting, backups and service providers may change. If personal information is transferred outside South Africa, MNA Investments will use a mechanism permitted by section 72 of POPIA, such as an adequate legal framework, a binding agreement that provides adequate protection, or another lawful basis. Material changes will be disclosed where appropriate.

7. Security and incidents

MNA Investments uses reasonable safeguards appropriate to the nature of the Service, including role-based access, authentication, secure connections, inactivity timeouts, tenant separation, audit logs, controlled support access, backups, maintenance and access review. No online service can guarantee absolute security.

A suspected loss, unauthorised access, disclosure or security weakness should be reported promptly through the support desk or to masia@econobee.co.za. MNA Investments will assess and contain incidents and will notify the responsible party, Information Regulator or affected data subjects where POPIA requires it.

8. Retention and deletion

Information is retained only for the purpose for which it was collected and for applicable contractual, legal, audit, backup and dispute periods. Production client data is retained for the Subscription Term and agreed exit period. A seven-day demo is disabled at expiry; any conversion grace period does not authorise continued normal use, and demo data may be deleted after the applicable notice period.

Verification files and failed or abandoned requests are removed or anonymised after reasonable anti-abuse, audit and legal periods. Backups rotate on controlled schedules and may retain deleted data temporarily until overwritten. Records may be retained longer where law, litigation or a lawful hold requires it.

9. Cookies and logs

The website and Service use essential cookies or equivalent technologies for authentication, session continuity, security and necessary preferences. Technical logs may record IP address, browser, device, requested page, date, time and account activity. Optional analytics or marketing technologies should operate only with any notice and consent required by law.

A browser may block cookies, but secure functions may then be unavailable. BEE Procured V5 does not rely on a cookie to issue an independent B-BBEE decision.

10. Data-subject rights

Subject to POPIA and lawful limitations, a person may ask whether MNA Investments holds personal information about them, request access, request correction or deletion, object to certain processing, withdraw consent where consent is the basis, object to direct marketing, and complain to MNA Investments or the Information Regulator.

Identity and authority may be verified before a request is actioned. A request concerning information controlled by a client may be referred to that client. Access may be limited where disclosure would affect another person's rights, security, confidentiality, privilege or another lawful ground.

11. Children, marketing and third-party links

The Service is intended for business users aged 18 or older and is not directed at children. If children's personal information is received without lawful authority, it should be reported for assessment and deletion.

Marketing is sent only where permitted. A recipient may opt out using the communication or by contacting MNA Investments. Service and security notices are not marketing and may still be sent to active clients.

Links or integrations operated by third parties are governed by their own terms and privacy notices. MNA Investments is not responsible for an unrelated third party's processing, but remains responsible for selecting and managing its own operators as required by law.

12. Contact, complaints and changes

Contact	Details
MNA Investments / BEE Procured V5	masia@econobee.co.za | 0861 11 3094
Information Officer	Masia - full name, designation and registration details to be completed
Information Regulator	https://inforegulator.org.za/ | enquiries@inforegulator.org.za

MNA Investments may update this Statement when the Service, operators, processing activities or law changes. The version and revision date identify the current document. Material changes will be communicated where appropriate.

Before publication, MNA Investments should confirm its registered Information Officer, legal entity particulars, hosting and backup locations, operator list, retention schedule and incident contact procedure.