

## C&L Developments

# Protection of Personal Information Act (POPIA)

## Website Privacy Notice

*Prepared for use on the C&L Developments website and related online enquiry forms*

Entity	C&L Developments
Website	cldev.co.za
Version	Website Privacy Notice – March 2026 draft
Primary purpose	To explain how personal information is collected, used, stored, shared, and protected in line with POPIA.

**Important:** This document is drafted as a practical website privacy notice for C&L Developments. It should be published with the website and aligned with any internal PAIA Manual, POPIA internal procedure, cookie banner, and form consent wording used by the company.

## 1. Introduction

C&L Developments respects the privacy of every person who visits its website, contacts the business, requests information, or submits details through an online form. This Privacy Notice explains how personal information may be collected and processed through the C&L Developments website and related digital communication channels.

This notice is intended to support compliance with the Protection of Personal Information Act 4 of 2013 (“POPIA”) and should be read together with any terms of use, quotation terms, engagement terms, and internal information governance procedures adopted by C&L Developments.

## 2. Responsible Party

For purposes of this website and its related online interactions, the responsible party is C&L Developments.

- Secunda office: 48 Drakensberg Street, Secunda, 2302
- Sasolburg office: 21 Riemland Street, Sasolburg, 1947
- Telephone: 017 634 5169
- Telephone: 016 973 2145
- Email: secunda@cldev.co.za
- Email: sasolburg@cldev.co.za

Privacy-related requests may be directed to the company through the above contact channels until a dedicated Information Officer contact is published on the website.

## 3. What personal information we may collect

Depending on how a visitor interacts with the website, C&L Developments may collect the following categories of personal information:

- Basic identification information, such as a name, surname, company name, and job title.
- Contact information, such as email address, telephone number, and physical or business address.
- Enquiry details, quotation requests, project information, tender-related details, and any documents voluntarily submitted by the user.
- Technical information, such as IP address, browser type, device information, pages visited, date and time of access, and general website usage information.
- Communication records, including emails, web form messages, call-back requests, and follow-up correspondence.

## 4. How personal information is collected

Personal information may be collected directly from the data subject when that person completes a contact form, requests a quotation, submits tender or project information, emails the company, telephones the company, or otherwise engages through the website.

Certain technical information may also be collected automatically through the operation of the website, server logs, analytics tools, cookies, or similar technologies used to improve security, performance, and user experience.

## 5. Purpose for processing personal information

C&L Developments will process personal information only for a specific, lawful, and business-related purpose. These purposes may include:

- Responding to website enquiries and contact requests.
- Preparing quotations, proposals, tenders, and service-related communications.
- Assessing client requirements and providing quantity surveying, cost management, maintenance cost verification, project management, or related commercial support services.
- Maintaining communication with existing and prospective clients, suppliers, service providers, and business contacts.
- Operating, securing, monitoring, and improving the website and its functionality.
- Complying with legal, regulatory, audit, contractual, and record-keeping obligations.
- Establishing, exercising, or defending legal rights where necessary.

## 6. Lawful basis for processing

C&L Developments will process personal information only where such processing is lawful under POPIA. Depending on the circumstances, processing may be based on consent, the need to take steps at the request of the data subject before entering into a contract, performance of a contract, compliance with legal obligations, legitimate business interests, or another lawful ground recognised under POPIA.

Where consent is required, the company will request it in a manner appropriate to the relevant interaction. A data subject may withdraw consent where the processing is based on consent, subject to any lawful basis that may still apply to continued retention or processing.

## 7. Cookies, analytics, and website tracking

The website may use cookies or similar technologies to improve website functionality, understand user behaviour, enhance security, and support performance monitoring. Cookies may remember preferences, help identify repeat visits, or generate aggregated usage statistics.

Where non-essential cookies or analytics tools are used, the website should display a suitable cookie notice or consent mechanism. Users may usually manage cookies through their browser settings, although disabling certain cookies may affect website functionality.

## 8. Disclosure of personal information

C&L Developments does not sell personal information. Personal information may, however, be shared where reasonably necessary and lawful, including with:

- Internal authorised personnel who require the information to respond to enquiries or deliver services.
- Website hosting providers, IT administrators, cloud or email service providers, and other operators who process information on behalf of the company under appropriate confidentiality and security obligations.
- Professional advisers, auditors, insurers, legal representatives, or debt recovery agents where required for legitimate business or legal purposes.
- Regulators, courts, law-enforcement agencies, or other persons where disclosure is required by law or necessary to protect rights or investigate misconduct.
- Third parties involved in a tender, project, claim, or dispute process where disclosure is necessary and lawful for the matter concerned.

Where an operator processes personal information on behalf of C&L Developments, the company should ensure that appropriate contractual obligations are in place as contemplated by POPIA.

## 9. Direct marketing

C&L Developments may from time to time send service-related updates or business communications. Direct marketing by electronic means will only be undertaken where permitted by POPIA and, where required, with the necessary consent or opt-in mechanism.

Any person receiving marketing communications should be given a practical opportunity to opt out or unsubscribe. Opt-out requests must be respected and actioned within a reasonable time.

## 10. Security safeguards

C&L Developments will take appropriate, reasonable technical and organisational measures to prevent loss of, damage to, unauthorised destruction of, unlawful access to, or unlawful processing of personal information. These safeguards may include access controls, password protection, limited user permissions, backups, secure hosting arrangements, anti-malware protection, and controlled document handling practices.

No online environment can be guaranteed to be completely secure. Users should therefore avoid sending highly sensitive confidential information through unsecured channels unless specifically requested and protected by suitable security measures.

## 11. Retention of personal information

Personal information will be retained only for as long as reasonably necessary to fulfil the purpose for which it was collected, to respond to enquiries, to maintain business records, to comply with legal or contractual obligations, or to resolve disputes.

When personal information is no longer required, C&L Developments should securely delete, destroy, de-identify, or anonymise it, unless a longer retention period is required or permitted by law.

## 12. Cross-border transfers

If personal information is stored or processed using systems, operators, or service providers located outside South Africa, C&L Developments should ensure that any cross-border transfer takes place in a manner permitted by POPIA, including where the recipient is subject to adequate protection obligations or where another lawful basis for transfer applies.

## 13. Data subject rights

Subject to POPIA and any other applicable law, a data subject may have the right to:

- Request confirmation of whether C&L Developments holds personal information about them.
- Request access to their personal information.
- Request correction, updating, or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading, or unlawfully obtained personal information.
- Object, on reasonable grounds, to the processing of personal information in certain circumstances.
- Object to processing for purposes of direct marketing.
- Withdraw consent where processing is based on consent.
- Lodge a complaint with the Information Regulator if they believe their rights have been infringed.

Requests may be made using the company contact details published in this notice. C&L Developments may request sufficient information to verify the identity of the requester before actioning the request.

## 14. Complaints to the Information Regulator

If a person believes that their personal information has been processed contrary to POPIA, they may first raise the matter with C&L Developments so that the company has an opportunity to address the concern. A complaint may also be submitted to the Information Regulator of South Africa using the complaint procedures and forms published by the Regulator.

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

## 15. Children's information

The website is not intended to actively solicit personal information from children. If any personal information relating to a child is processed, this should occur only where lawful and appropriate in terms of POPIA and any other applicable legal requirements.

## 16. Third-party links

The website may contain links to third-party websites or platforms. C&L Developments is not responsible for the privacy practices, content, or security of third-party websites, and users should review the privacy notices applicable to those websites separately.

## 17. Updates to this notice

C&L Developments may update this Privacy Notice from time to time to reflect changes in law, business operations, website features, or information processing activities. The latest version published on the website will apply from the effective date stated in that version.

## 18. Recommended website footer reference

For practical website use, the footer may include a short link reference such as: “Privacy Notice | POPIA | Terms & Conditions”. The full Privacy Notice should be accessible from all pages that collect personal information, especially the contact page and any quotation, upload, or tender enquiry forms.

## 19. Internal implementation notes

Before publication, C&L Developments should confirm the following operational points:

- Whether a formal Information Officer and any Deputy Information Officer details must be inserted.
- Whether the website uses analytics, tracking scripts, form plugins, CAPTCHA tools, or embedded third-party services that should be named more specifically.
- Whether the company intends to send newsletters or promotional emails and therefore needs a compliant consent and opt-out process.
- Whether a separate PAIA Manual link will also be published on the website.

## Source note

This document was drafted using C&L Developments company information made available in the company profile, including the company’s service positioning and published contact details, together with South African POPIA guidance published by the Information Regulator and the official POPIA text.