

POPIA Compliance Overview

Jürgen's Photography CC • Reg 2007/001109/23 • Version 1.0, May 2026

4 Dawlish Road, Plumstead, Cape Town, 7801.

Effective date: 8 May 2026. Next review: May 2027.

Purpose of this document

This overview sets out how Jürgen's Photography CC complies with the Protection of Personal Information Act 4 of 2013 (POPIA) when processing personal information in the course of providing corporate photography services. It is intended for procurement and compliance teams onboarding Jürgen's Photography as a vendor.

It should be read alongside three operational documents already published on the Jürgen's Photography website:

- Event Photography Consent Notice
- Delegate Opt-Out Protocol
- Image Storage and Deletion Policy

All three are available at jorgen.co.za/downloads/compliance/.

1. Information Officer

In line with section 55 of POPIA, the Information Officer for Jürgen's Photography CC is the owner of the business.

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| Name | Jürgen Banda-Hansmann |
| Role | Owner, sole Information Officer |
| Email | jorgen@jorgen.co.za |
| Phone | +27 78 919 0454 |
| Postal address | 4 Dawlish Road, Plumstead, Cape Town, 7801 |

The Information Officer is registered with the Information Regulator and is the single point of contact for all POPIA-related queries, requests, and complaints.

2. Categories of personal information processed

Jürgen's Photography processes the following categories of personal information:

- Client contact details. Name, email address, telephone number, job title, and company name of the individual commissioning the work, plus relevant colleagues involved in the project.
- Subject likeness. Photographic images of individuals appearing in commissioned work. This includes employees of client companies, executives, conference speakers, and conference delegates.
- Banking and billing details. Bank account name, branch, and account number where these are required for invoicing and payment.
- Image metadata. Technical metadata captured by the camera at the time of the shoot, including date, time, and (where geotagging is enabled) location.

No special personal information (as defined in section 26 of POPIA) is processed in the ordinary course of business. Children's personal information (section 34) is not processed unless a client specifically commissions a shoot involving minors, in which case parental or guardian consent is obtained in writing before processing.

3. Purposes of processing and lawful basis

Each processing activity is matched to a lawful basis under section 11 of POPIA.

| Purpose | Lawful basis (section 11) |
|--|--|
| Quoting, contracting, invoicing, and project communication with the client | Performance of a contract (s11(1)(b)) |
| Capturing and delivering photographs of subjects under a commissioned brief | Performance of a contract with the client (s11(1)(b)), supported by consent from subjects where required (s11(1)(a)) |
| Photographing conference and event delegates as part of an event coverage brief | Legitimate interest of the client and the photographer (s11(1)(f)), with notice and an opt-out mechanism for delegates |
| Storing and backing up final image files for client re-access and warranty | Performance of contract (s11(1)(b)) and legitimate interest (s11(1)(f)) |
| Retaining a limited portfolio of images for marketing and case studies | Consent from the client and, where applicable, the subject (s11(1)(a)) |
| Tax, accounting, and statutory record-keeping | Compliance with an obligation imposed by law (s11(1)(c)) |

4. Sources of personal information

Personal information is collected from two sources:

- Directly from the data subject in the case of clients, who supply their own contact and billing details when commissioning work, and in the case of headshot subjects who participate in a session and complete release or consent steps.
- From the client commissioning the shoot in the case of conference and event coverage, where attendee lists, speaker schedules, and agendas may be shared with Jürgen's Photography for production purposes. In these cases the client remains the responsible party for providing notice to delegates, and Jürgen's Photography supplies the on-site signage and opt-out protocol.

5. Recipients and third-party operators

Personal information is shared only with the categories of operator listed below. All operators are engaged under terms that require them to process personal information on our instructions only and to maintain appropriate security safeguards, in line with section 21 of POPIA.

| Category | Purpose |
|---|---|
| Cloud storage and backup providers | Encrypted storage of working and archived image files |

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|---|---|
| Transactional email service | Sending automated emails such as quote confirmations and gallery delivery notifications |
| Image delivery and gallery platforms | Hosting client galleries for review, selection, and download |
| Accounting and invoicing software | Generating invoices and managing financial records |
| Banking partners | Processing electronic funds transfers |

We do not sell personal information to third parties. We do not share personal information with any party for direct marketing purposes.

6. Cross-border transfer

Some operators host data on infrastructure located outside the Republic of South Africa, primarily in the European Union, United Kingdom, or United States. Where this occurs, transfers are made on the basis permitted by section 72 of POPIA, namely that the recipient is subject to a law, binding corporate rules, or contractual terms that provide an adequate level of protection substantially similar to POPIA.

Operators are selected on the basis of their published data protection terms, encryption in transit and at rest, and their contractual commitment to act on documented instructions only. A current list of operators and their hosting jurisdictions is available from the Information Officer on request.

7. Retention

Image files and supporting personal information are retained in line with the published Image Storage and Deletion Policy, available at jurgen.co.za/downloads/compliance/jurgens-photography-image-storage-deletion-policy.pdf.

Financial records and tax-related information are retained for the period required by the Tax Administration Act and the Companies Act, currently five years from the end of the relevant tax year.

Information no longer required is destroyed or de-identified in line with section 14 of POPIA.

8. Security safeguards

Section 19 of POPIA requires the responsible party to secure the integrity and confidentiality of personal information through appropriate, reasonable technical and organisational measures.

The following measures are in place:

- All devices used for processing are protected by strong passwords and disk encryption.
- Two-factor authentication is enabled on all email, cloud storage, accounting, and gallery delivery accounts.
- Backups are encrypted and stored in geographically separate locations.
- Access to client image folders and contact records is restricted to the Information Officer.
- Operators are selected only where they provide encryption in transit and at rest, role-based access control, and a documented incident response process.
- Working files relating to a project are removed from active devices in line with the retention schedule and retained only in archival storage.
- In the event of a security compromise affecting personal information, affected data subjects and the Information Regulator will be notified as required by section 22 of POPIA.

9. Data subject rights

Under sections 23, 24, and 25 of POPIA, data subjects have the right to:

- Confirm whether Jürgen's Photography holds their personal information.
- Request access to that information.
- Request correction or deletion of inaccurate, irrelevant, excessive, or unlawfully obtained information.
- Object to processing on reasonable grounds.
- Withdraw consent, where consent is the lawful basis for processing.
- Lodge a complaint with the Information Regulator.

To exercise any of these rights, data subjects may write to the Information Officer at jurgen@jurgen.co.za. Requests are acknowledged within five business days and resolved within thirty days, in line with the Promotion of Access to Information Act (PAIA).

10. Consent for event and conference photography

For commissioned events and conferences, consent and notice are managed through two operational documents:

- Event Photography Consent Notice. Supplied to the client for display at registration desks and on event signage. Available at jurgen.co.za/downloads/compliance/jurgens-photography-event-consent-notice.pdf.
- Delegate Opt-Out Protocol. Sets out how delegates who do not wish to be photographed signal that preference, how the photographer recognises the signal on the day, and how affected images are handled in post-production. Available at jurgen.co.za/downloads/compliance/jurgens-photography-delegate-opt-out-protocol.pdf.

Together these documents implement the notification and opt-out mechanism required where photography of attendees is conducted on the basis of legitimate interest under section 11(1)(f).

11. Complaints

Data subjects who believe their personal information has been processed in a manner inconsistent with POPIA may lodge a complaint directly with the Information Officer at jurgen@jurgen.co.za. We will investigate and respond within thirty days.

Data subjects also have the right to lodge a complaint with the Information Regulator.

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| Authority | Information Regulator of South Africa |
| Phone | 010 023 5200 |
| Email | complaints.IR@justice.gov.za |
| Address | JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 |

12. Document control

This overview is reviewed annually by the Information Officer or sooner if there is a material change in processing activities, operators, or applicable law.

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| Document owner | Jürgen Banda-Hansmann, Information Officer |
| Version | 1.0 |

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| Effective date | 8 May 2026 |
| Next scheduled review | May 2027 |

Jürgen's Photography CC is a registered Close Corporation in the Republic of South Africa (Reg 2007/001109/23) and a B-BBEE Level 4 EME contributor with 100% procurement recognition.