# Privacy Policy

## How we collect, use, and protect your personal information

**TRUST FRAMEWORK PUBLICATION TC-LEG-001**

Last updated: August 2026

## 1. DOCUMENT CONTROL

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| **Document Title** | Privacy Policy |
| **Document Number** | TC-LEG-001 |
| **Document Owner** | Craig Cloete<br>Information Officer |
| **Applicable Legal Entities** | Teracloud Technologies CC (South Africa)<br>Terracloud Technology GmbH (Germany)<br>Terracloud Technology Ltd (United Kingdom) |
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| **Approved By** | Craig Cloete, Information Officer |

## Revision History

| Version | Date | Summary of Changes | Author |
|---|---|---|---|
| 1.0 | August 2026 | First issue as TC-LEG-001 within the Terracloud Trust Framework. Original document; no prior version exists. | Craig Cloete |

## Introduction

Terracloud Technology is committed to protecting your personal information and ensuring that your privacy is respected. We operate as a compliance-focused IT and cybersecurity provider and apply data protection principles across all our services.

This Privacy Policy explains how we collect, use, and safeguard personal data in accordance with:

- The Protection of Personal Information Act (POPIA) – South Africa
- The General Data Protection Regulation (GDPR) – European Union and United Kingdom

## Who We Are

Terracloud Technology operates across multiple jurisdictions, including South Africa, Germany, and the United Kingdom.

Depending on your interaction with us, the relevant Terracloud entity acts as the **data controller**.

The designated Information Officer (POPIA) and Data Protection Contact (GDPR) is:

**Craig Cloete** — Information Officer

Terracloud Technology (Reg. 2011/083806/23)

Email: privacy@terracloud.technology

## Information We Collect

We collect only the information necessary to provide our services.

**This may include:**

- First Name and Last Name
- Email Address
- Contact Number **(optional)**
- Company Name (optional)
- Information submitted via contact forms or direct communication

## How We Use Your Information

We process personal information for the following purposes:

- Responding to enquiries
- Providing IT, security, and compliance services
- Communicating with prospective or existing clients
- Maintaining business records
- Complying with legal and regulatory obligations

## Legal Basis for Processing (GDPR)

Where GDPR applies, we rely on:

- Consent (submitted via forms)
- Legitimate interest (business communication and service delivery)
- Contractual necessity
- Legal obligations

## POPIA Compliance

We process personal information in accordance with POPIA principles:

- Accountability
- Processing limitation
- Purpose specification
- Further processing limitation
- Information quality
- Openness
- Security safeguards
- Data subject participation

## Data Sharing

We do not sell, rent, or trade personal information.

We may share data with trusted service providers, including:

- Cloud platforms (e.g. Microsoft 365)
- Hosting providers
- Security and IT platforms

All third parties are required to maintain appropriate security and confidentiality.

## Cross-Border Data Transfers

Due to our international operations, personal data may be processed across South Africa, Germany, and the United Kingdom. Specific transfer scenarios include:

- Email and document storage via **Microsoft 365**, hosted in European data centres (EU GDPR Standard Contractual Clauses apply)
- Website hosting via Cloudflare (data processed in accordance with Cloudflare's GDPR-compliant DPA)
- IT and security platform providers operating under data processing agreements that comply with POPIA s.21 and GDPR Art.28

Where personal data is transferred from South Africa to recipients in countries not designated by the Information Regulator as having adequate protection, we rely on binding contractual obligations (POPIA s.72) or the data subject's consent. For transfers from the EU/UK, we rely on Standard Contractual Clauses or adequacy decisions where applicable.

## Data Retention

We retain personal information for the following periods:

- **Website enquiries and contact form submissions:** 24 months from the date of submission, or until the enquiry is resolved, whichever is later
- **Client and service records:** 5 years from the end of the service relationship, in accordance with South African statutory requirements
- **Financial and invoicing records:** 7 years, as required by the South African Income Tax Act and Companies Act
- **Job applications (unsuccessful):** 12 months from date of application, unless the applicant consents to a longer retention period for future opportunities
- **Marketing communications:** Until consent is withdrawn or an opt-out request is received

At the end of each applicable retention period, personal information is securely deleted or anonymised.

## Your Rights

### GDPR (EU / UK)

You have the right to:

- Access your personal data
- Request correction or deletion
- Object to processing
- Restrict processing
- Data portability

### POPIA (South Africa)

You have the right to:

- Access your personal information
- Request correction or deletion
- Object to processing. Data Security

We implement appropriate technical and organisational measures, including:

- Encryption at rest
- Email Encryption
- Access control
- Endpoint protection (AV)
- Monitoring and threat detection (EDR)
- Monthly security scans
- Dark Web Monitoring

## How to Exercise Your Rights

To submit a data subject request, email our Information Officer at privacy@terracloud.technology with the subject line “Data Subject Request”. Please include:

- Your full name and contact details
- The nature of your request (access, correction, deletion, objection, portability)
- Sufficient information to identify the personal data concerned

We will acknowledge your request within 3 business days and respond within 30 days (POPIA) or one calendar month (GDPR). We may request proof of identity before processing your request. There is no charge for a first request in any 12-month period.

## Contact

To exercise any of your rights, or to submit a privacy-related query or complaint, contact our Information Officer:

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| **Security Contact** | security@terracloud.technology |
| **Information Officer** | Craig Cloete |
| **Privacy Contact** | privacy@terracloud.technology |
| **Website** | https://www.terracloud.technology |
| **Trust Centre** | https://www.terracloud.technology/trust-centre |

### Supervisory authorities

If you believe your data protection rights have not been respected, you have the right to lodge a complaint with the relevant supervisory authority:

**South Africa:** Information Regulator of South Africa — inforeg.org.za

**Germany (EU):** Federal Commissioner for Data Protection and Freedom of Information (BfDI) — bfdi.bund.de

**United Kingdom:** Information Commissioner's Office (ICO) — ico.org.uk

## Related Documents

This policy forms part of the Terracloud Trust Framework and should be read together with the following controlled publications:

- TC-LEG-002 — Terms of Use
- TC-LEG-003 —PAIA Manual
- TC-LEG-004—Cookie Policy
- TC-LEG-005 — Applicant Privacy Notice
- TC-LEG-006 — Data Subject Request Form
- TC-SEC-001 — Responsible Disclosure Policy
- TC-SEC-002 — Compliance & Security Statement