

Privacy Policy – Oaths.co.za™

⚠ IMPORTANT LEGAL NOTICE

1. This document has been updated to improve consistency, clarity, and legal defensibility based on the materials provided.
2. Any statement suggesting formal **registration, approval, endorsement, or good standing** with the Information Regulator or any other regulator should only be included if independently verified. For that reason, this version does **not** repeat any unverified regulator-registration claim.
3. Any public statement relating to **blockchain, Microsoft Azure Confidential Ledger, immutable logs, cryptographic deletion, penetration testing, exclusive South African hosting**, or similar technical architecture should only remain in published documents if operationally accurate and capable of proof. Where not yet verified, wording has been moderated.
4. This Privacy Policy is drafted on the basis that Oaths.co.za™ facilitates **true-copy certification only** and does **not** facilitate the remote commissioning of affidavits, affirmations, or sworn declarations.
5. This Privacy Policy uses cautious wording regarding **cross-border transfers, minor-data safeguards, and retention/deletion** so that the document remains accurate even where external vendors, support tools, analytics tools, payment providers, or legal retention duties may apply.

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1. Introduction

1. This Privacy Policy explains how **Beantech (Pty) Ltd**, operating **Oaths.co.za™**, collects, uses, stores, protects, and otherwise processes personal information.
2. This policy is intended to align with applicable South African privacy and access-to-information requirements, including the **Protection of Personal Information Act 4 of 2013** and related legal obligations.
3. Oaths.co.za™ is a digital platform designed to facilitate the certification of **true copies of supported South African documents** by duly appointed Commissioners of Oaths.
4. This policy must be read together with the:
 1. Terms and Conditions;
 2. Prohibited Use Policy;
 3. PAIA Manual; and
 4. any applicable consent notices or onboarding disclosures presented during registration or use.

2. Who We Are

1. **Operator:** Beantech (Pty) Ltd
2. **Registration Number:** 2010/008997/07
3. **Platform:** Oaths.co.za™
4. In this policy, “we”, “us”, and “our” refer to Beantech (Pty) Ltd.
5. **[FLAG: Verify whether any regulator reference is factually accurate and appropriate before publication]**

3. Information We Collect

1. Depending on how you use the platform, we may collect and process the following categories of personal information:

Category	Examples
Identity Information	Full names, surname, South African ID number, facial or biometric verification data, passport or document details
Contact Information	Email address, mobile number, residential or physical address
Document Information	Copies, images, captures, uploads, or metadata relating to supported documents submitted through the platform
Technical Information	Device details, browser type, IP address, operating system, usage logs, session information

Verification and Compliance Information	Identity verification results, liveness checks, fraud indicators, compliance-screening results where applicable
Guardian Information	Parent or legal guardian name, ID number, contact details, relationship to the minor, consent records
Support and Communication Information	Queries, complaints, correspondence, support records, and service-related communications

2. We collect only information reasonably necessary for the lawful operation of the platform, its verification and certification workflow, related compliance functions, support services, and record-keeping.

4. How We Collect Information

1. We may collect information:
 1. directly from you when you register, subscribe, upload documents, complete identity verification, request support, or otherwise use the platform;
 2. automatically through platform logs, security tools, device and browser interactions, cookies, and session monitoring;
 3. from parents or legal guardians where a minor user is involved; and
 4. from trusted service providers or verification sources where this is lawful and necessary for identity verification, fraud prevention, payment processing, hosting, support, or compliance functions.

5. Purposes of Processing

1. We may process personal information for purposes that include:
 1. creating and administering user accounts;
 2. verifying identity and helping prevent impersonation, fraud, or misuse;
 3. facilitating the submission, review, and certification workflow for supported documents;
 4. enabling secure storage, retrieval, verification, audit logging, and related platform functionality;
 5. recording and managing guardian consent for eligible minor users;
 6. communicating with users regarding their accounts, subscriptions, support requests, or compliance matters;
 7. improving platform reliability, usability, security, and service performance;
 8. complying with legal, regulatory, audit, evidentiary, and record-keeping obligations; and
 9. investigating complaints, incidents, disputes, suspected fraud, or unlawful activity.

2. Certification through the platform confirms only that a copy corresponds with the original presented through the platform process. It does **not** confirm the authenticity, validity, or legal status of the original document itself.

6. Lawful Grounds for Processing

1. We may process personal information on one or more lawful grounds, including:
 1. your consent;
 2. steps taken at your request before entering into a contract or the performance of a contract with you;
 3. compliance with legal obligations;
 4. a legitimate interest of the Company or another lawful interest recognised under applicable law, including platform security, fraud prevention, and service integrity; and
 5. guardian consent in relation to an eligible minor user, where applicable.
2. Where processing is based on consent, you may withdraw that consent, subject to any lawful basis we may have to continue retaining or processing specific information.

7. Sharing of Personal Information

1. We share personal information only where lawful and reasonably necessary.
2. Personal information may be shared with:
 1. duly appointed Commissioners of Oaths for certification-related purposes;
 2. trusted service providers that support hosting, verification, fraud prevention, communications, analytics, payment processing, security, compliance, or technical operations;
 3. professional advisers, auditors, insurers, or service providers assisting with lawful business, compliance, dispute, or risk-management matters; and
 4. regulators, courts, law-enforcement agencies, or other competent authorities where disclosure is required or permitted by law.
3. We do **not** sell personal information.
4. Where third parties process personal information on our behalf, we require that they are subject to appropriate confidentiality, security, and lawful-processing obligations.

8. Security Safeguards

1. We apply reasonable technical and organisational safeguards intended to protect personal information against loss, misuse, unauthorised access, disclosure, alteration, or destruction.
2. These safeguards may include:
 1. encryption in transit and at rest;
 2. restricted access controls and authentication measures;

3. role-based permissions and internal access limitation on a need-to-know basis;
 4. audit logging and monitoring;
 5. identity verification and fraud-detection controls; and
 6. secure hosting and related operational security measures.
3. No method of transmission, storage, or processing is completely secure, and we therefore cannot guarantee absolute security.
 4. **[FLAG: Retain any specific public claim regarding AES-256, Confidential Ledger, blockchain, penetration testing, immutable logs, or cryptographic deletion only if verified as implemented and provable]**

9. Data Location and Cross-Border Transfers

1. Based on the materials provided, Oaths.co.za™ is intended to operate with data hosted in South Africa.
2. We will not transfer personal information outside South Africa unless:
 1. the transfer is lawful;
 2. it is necessary for service delivery, operational support, or legal compliance;
 3. adequate protection is in place; or
 4. consent has been obtained where required.
3. Where cross-border processing occurs through a service provider, support tool, or other operational dependency, we will seek to ensure that appropriate safeguards are in place in accordance with applicable law.
4. **[FLAG: Do not publish an absolute statement that “no data leaves South Africa” unless this has been technically and contractually verified across all vendors, backups, email systems, analytics tools, and payment flows]**

10. Minors and Guardian Consent

1. Oaths.co.za™ may permit eligible users aged **16 to under 18 years** to use the platform, subject to valid and verifiable parent or legal guardian consent.
2. We process minor-user information only where the platform’s eligibility, consent, and verification requirements have been satisfied.
3. Guardian information may be collected and retained for purposes that include:
 1. verifying identity, authority, and consent;
 2. recording and managing consent status;
 3. administering access to a minor user account; and
 4. responding to support, compliance, legal, or dispute matters involving the minor user account.
4. If guardian consent is withdrawn, we may restrict or terminate the minor user’s future access to the platform, subject to any lawful retention obligations that continue to apply.
5. We apply additional safeguards to information relating to minor users.

6. **[FLAG: Use cautious wording such as “additional safeguards apply” unless ring-fenced ledger architecture, separate encrypted environments, and deletion processes are fully implemented and provable]**

11. Your Rights

1. Subject to applicable law, you may have the right to:
 1. request access to personal information we hold about you;
 2. request correction of inaccurate, incomplete, or outdated information;
 3. object to certain processing;
 4. request deletion of information where legally permissible;
 5. withdraw consent where processing is based on consent; and
 6. lodge a complaint with the appropriate South African authority.
2. Where a minor user is involved, a parent or legal guardian may exercise rights on the minor’s behalf to the extent permitted by law and platform process.
3. Rights requests may be directed to compliance@oaths.co.za.
4. We may require proof of identity, authority, or additional information before acting on a request.

12. Retention and Deletion

1. We retain personal information only for as long as reasonably necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by law.
2. Retention periods may be influenced by:
 1. legal and regulatory obligations;
 2. fraud prevention and security monitoring needs;
 3. dispute resolution and complaint handling;
 4. audit and evidentiary requirements; and
 5. operational record-keeping.
3. When an account closes or a subscription ends, some information may remain retained for lawful compliance, security, audit, fraud-prevention, or evidentiary purposes.
4. Where deletion is requested, we will assess the request against any legal or operational basis for continued retention.
5. **[FLAG: Verify whether any stated post-subscription retrieval window, such as a 60-day period, is operationally accurate before publication]**

13. Cookies and Analytics

1. Oaths.co.za™ may use cookies or similar technologies for purposes that include:
 1. security;
 2. session management;
 3. platform functionality;
 4. performance monitoring; and

5. user-experience improvement.
2. Analytics tools, where used, should be configured in a manner consistent with this policy and applicable law.
3. Users may be able to manage certain cookie settings through their browser, subject to the effect this may have on platform functionality.

14. Complaints and Contact Details

1. Questions, requests, complaints, or privacy-related communications may be directed to:

Information Officer

Mr J.M. van der Westhuizen

Professional Accountant (SA) | Commissioner of Oaths (Ex Officio)

Email: compliance@oaths.co.za

Address: **Regus Cradlestone Mall, Entrance 5, L2, 17 Hendrik Potgieter Road, Krugersdorp, Gauteng 1739**

2. If you believe your personal information has been processed unlawfully, you may also lodge a complaint with the appropriate South African regulator or seek another lawful remedy.

15. Revision History

Version	Date	Summary of Change
1.0	20 May 2025	Initial issue
1.1	19 October 2025	Added minor and guardian consent framework
2.0	25 May 2026]	Updated and harmonised privacy wording, lawful grounds, sharing, retention, security, cross-border transfer, and minor-processing provisions