

# TSM Consulting Privacy Policy

Effective date 14 September 2026

TSM Consulting respects your privacy and is committed to protecting personal information in accordance with the Protection of Personal Information Act 4 of 2013 and other applicable South African laws. This Privacy Policy explains how we collect, use, store, share and protect personal information when you visit our website, contact us, submit an enquiry, respond to our marketing, or use our human resources, organisational development and assessment services.

## 1 Who We Are

TSM Consulting provides human resources, organisational development, recruitment, training and behavioural and psychometric assessment services. For purposes of POPIA, TSM Consulting is the responsible party for personal information that it determines how and why to process. In some client engagements, TSM Consulting may process personal information on behalf of a client and in accordance with that client's instructions.

Contact details:

- Email: [consulting@tsm.co.za](mailto:consulting@tsm.co.za)
- Telephone: +27 (0)21 975 8926 / 7000
- Address: 11 Synagogue Street, Paarl, 7646, South Africa
- Website: <https://tsm.co.za/>

## 2 Personal Information We Collect

Depending on how you interact with TSM Consulting, we may collect the following categories of personal information:

- Identity and contact information, including your name, surname, work email address, telephone number, job title, employer and location.
- Enquiry and communication information, including messages, requests, meeting details and records of correspondence.
- Recruitment and employment-related information, including CVs, qualifications, work history, references, screening information and information supplied during a recruitment process.
- Assessment information, including assessment responses, scores, reports, behavioural observations, competency information and development feedback, where TSM Consulting has been appointed to provide assessment services.
- Technical and usage information, including IP address, device and browser information, pages viewed, referral source and interactions with the website or online advertising.

- Marketing information, including communication preferences, advertising interactions and information supplied through LinkedIn or other lead-generation forms.
- Any other information you voluntarily provide to us.

### **3 How We Collect Personal Information**

We may collect personal information directly from you, from the organisation that employs or engages you, from clients that appoint us, from candidates and referees, from assessment and service providers, from publicly available professional sources, and automatically through our website and approved analytics or advertising technologies.

### **4 Why We Process Personal Information**

We process personal information for legitimate and specific business purposes, including to:

- Respond to enquiries and arrange consultations.
- Provide proposals, quotations and information about our services.
- Deliver HR, organisational development, recruitment, training and assessment services.
- Administer assessments, prepare reports and provide feedback to authorised recipients.
- Manage client and supplier relationships and fulfil contractual obligations.
- Verify candidate information and conduct agreed recruitment or screening activities.
- Operate, secure, maintain and improve our website and services.
- Measure marketing and website performance and understand how visitors interact with our content.
- Send relevant business communications where permitted, and manage objections or opt-out requests.
- Meet legal, regulatory, professional, accounting and record-keeping obligations.
- Establish, exercise or defend legal rights.

### **5 Lawful Grounds for Processing**

Depending on the circumstances, TSM Consulting may process personal information with consent; when necessary to enter into or perform a contract; to comply with a legal obligation; to protect a legitimate interest of the data subject; or where processing is necessary for the legitimate interests of TSM Consulting or a third party and those interests are not overridden by the data subject's rights.

Where consent is the appropriate basis, you may withdraw it at any time. Withdrawal does not affect processing that took place lawfully before consent was withdrawn.

### **6 Assessment and Candidate Information**

Assessment and candidate information can be sensitive and is handled with additional care. TSM Consulting will process this information only for the agreed selection, development, talent-management or related purpose. Information may be provided to the client organisation, employer or other authorised recipient that commissioned the service, subject to the applicable engagement, consent and legal requirements.

TSM Consulting may use licensed assessment platforms and professional test providers to administer assessments or generate reports. These providers may process information as operators,

independent responsible parties, or equivalent parties under their own terms and privacy practices. TSM Consulting will use appropriate contractual and security measures where required.

Assessment outcomes support professional decision-making but should not be treated as the sole basis for an employment or development decision unless this is lawful, appropriate and agreed.

## **7 Sharing Personal Information**

We do not sell personal information. We may share personal information only where reasonably necessary with:

- The client, employer or authorised organisation that commissioned the relevant service.
- Assessment publishers, platforms, consultants, associates and service providers involved in delivering the service.
- Website hosting, information technology, customer relationship management, communications, analytics and advertising providers.
- Professional advisers, auditors, insurers, regulators, law-enforcement bodies or courts where required or permitted by law.
- A successor or relevant party in connection with a lawful business restructuring, subject to appropriate safeguards.

All recipients must receive only the information reasonably necessary for their role and must protect it in accordance with applicable law and contractual obligations.

## **8 International Transfers**

Some assessment, cloud, analytics, advertising or technology providers may store or process personal information outside South Africa. Where personal information is transferred across borders, TSM Consulting will take reasonable steps to ensure that the transfer complies with POPIA, including by using appropriate contractual protections or transferring information to a recipient subject to an adequate level of protection.

## **9 Cookies Analytics and Advertising**

Our website may use cookies and similar technologies to operate securely, remember preferences, understand website usage and measure advertising effectiveness. These technologies may include Google Analytics and the LinkedIn Insight Tag.

Essential cookies support website operation and security. Analytics and advertising cookies help us understand website activity, measure campaigns, create relevant audiences and improve our communications. Where consent is required, non-essential cookies should be activated only after consent has been obtained through the website's cookie controls.

You can manage cookies through the website's cookie settings, where available, or through your browser settings. Blocking some cookies may affect website functionality. Google and LinkedIn may process information in accordance with their own privacy policies and account settings.

## 10 Direct Marketing

TSM Consulting may send relevant business-to-business communications where permitted by law. Where consent is required, we will request it. You may object to direct marketing or unsubscribe at any time by using the unsubscribe method provided or by contacting [consulting@tsm.co.za](mailto:consulting@tsm.co.za). We will retain the minimum information necessary to record and respect an opt-out request.

## 11 Information Security

TSM Consulting uses reasonable technical and organisational safeguards to protect personal information against loss, misuse, unauthorised access, interference, alteration, disclosure or destruction. Safeguards may include access controls, confidentiality obligations, secure systems, service-provider due diligence, backups and incident-response procedures.

No electronic transmission or storage method is completely secure. If a security compromise affects personal information, TSM Consulting will respond and notify the Information Regulator and affected data subjects where required by law.

## 12 Retention

We retain personal information only for as long as reasonably necessary for the purpose for which it was collected, to fulfil contractual or professional obligations, to comply with legal and record-keeping requirements, or to establish, exercise or defend legal rights. Retention periods vary according to the type of record and the client engagement. When information is no longer required, it will be securely deleted, destroyed or de-identified where reasonably practicable.

## 13 Your Rights

Subject to POPIA and applicable legal limitations, you may:

- Ask whether TSM Consulting holds personal information about you.
- Request access to your personal information.
- Request correction or deletion of inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained information.
- Object to certain processing, including direct marketing.
- Withdraw consent where processing is based on consent.
- Request information about the identity of third parties that have had access to your information where applicable.
- Submit a complaint to the Information Regulator.

To exercise these rights, contact [consulting@tsm.co.za](mailto:consulting@tsm.co.za). We may need to verify your identity before responding. Requests will be handled within the periods required by applicable law.

## 14 Information About Children

TSM Consulting's website and marketing are directed primarily to organisations and working professionals. We do not knowingly collect personal information from children through the website

without appropriate authorisation. Where a service lawfully involves a child, information will be processed only with the authorisation required by law and with suitable safeguards.

## **15 Third Party Websites**

Our website may link to third-party websites or services. TSM Consulting is not responsible for the privacy practices or content of those third parties. You should review their privacy policies before providing personal information.

## **16 Complaints**

Please contact TSM Consulting first so that we can try to resolve any privacy concern. You may also submit a complaint to the Information Regulator of South Africa. Current complaint channels and contact details are available at <https://inforegulator.org.za/complaints/>.

## **17 Changes to This Policy**

We may update this Privacy Policy when our services, technologies or legal obligations change. The latest version will be published on the TSM Consulting website with its effective date.

## **18 Contact Us**

Questions, requests or objections concerning this Privacy Policy or TSM Consulting's processing of personal information may be directed to:

- The Information Officer, TSM Consulting
- Email: [consulting@tsm.co.za](mailto:consulting@tsm.co.za)
- Telephone: +27 (0)21 975 8926 / 7000
- Address: 11 Synagogue Street, Paarl, 7646, South Africa