GLS Consulting – Consulting Services Client Data - Privacy Policy
Ver 1.07: Updated 2025/09/01

General

Our data privacy policy conforms to the South African Protection of Personal Information (POPI) Act that is aligned with the European General Data Protection Regulation (GDRP). The information below pertains specific to GLS Consulting – Consulting Services Client Data.

Generally, you can browse through our website without giving us any information about yourself. When personal data is required, e.g. on the contact form, this policy describes how that information is collected and stored in our Customer Relationship Management (CRM) system.

We do not knowingly allow access or collect any personal data from children. The GLS Consulting Services is targeting adults with or busy with tertiary education. If we become aware a user under the age of 18 provided personal data without parental consent, we will delete personal data from our records.

GLS Consulting as Data Processor of Utility Billing Data

GLS Consulting is the *Data Processor* for Utility Billing Data when processed by GLS Consulting in the GLS Swift™ software and other GLS software products. GLS Consulting signs a Service Level Agreement (SLA) with the *Data Controller*, our Client, typically a Utility, Municipality, Local Authority or other Consultant. A Data Privacy and Protection Agreement is included in this SLA.

The Client then facilitates the provision of the data extract from the Utility Billing Dataset, for value-added processing by GLS Consulting. GLS Consulting then provides processed data back to the Client in GLS' Swift™ software or via the IMQS™ web-based reporting system, provided by IMQS Software (Pty) Ltd.

A separate SLA or Annual Licensing Service and Maintenance Agreement (ALSMA) is concluded between the Client and IMQS that covers specific data privacy requirements in terms of POPI between the Client and IMQS Software (Pty) Ltd. GLS Consulting has a general Data Privacy and Protection Agreement in place with IMQS Software (Pty) Ltd that addresses the requirements of POPI.

We respect the personal data as included in the Utility Billing Data and this Privacy Policy details how we handle the data in general. Our Client is however ultimately responsible for obtaining any necessary consent and/or ensuring that they have the lawful basis for processing personal data and transferring the personal data to a *Data Processors* such as GLS Consulting.

What personal data do we collect: CRM via the website contact form

We collect some basic personal information to identify you, such as your name, company name, and email address. The public IP address of your computer maybe also be collected. We validate some data, e.g. email address, where we can.

Optional personal data what we collect: CRM via the website contact form

Optionally your business address and business telephone number can also be provided. By leaving them blank, you opt not to provide them.

Opting out of marketing email from our CRM

You have the right to opt out of marketing email from GLS Consulting. All automated emails from GLS Consulting have a banner at the bottom, with simple instructions to permanently opt out of marketing email. Your choice is recorded with date and time, and the preference is stored in the database of our international CRM provider and automatically applied to all future marketing email sent by GLS Consulting.

Cookies, tracking technologies and logfiles on our website

When you visit our website, third parties such as our international analytics providers use cookies, web beacons, and other technologies to collect information about your online activities over time and across different websites or online services. As is true with most web sites, we collect certain data automatically and stores it in log files. This information may include internet protocol addresses as well as browser, internet service provider, referring/exit pages, operating system, date/time stamp, and click stream data. Occasionally we may connect personal information to data gathered in our log files, as necessary to improve our service to individual customers. Otherwise, we mostly use this information with no connection to individual users, to analyse trends, administer our site, or track usage of various features within our site.

Secure international transfer of personal data: CRM Data

All personal data captured from our website forms is automatically transferred on end-user confirmation, via encrypted secure socket layer technology (SSL) to our international CRM provider for use only be selected GLS staff.

In terms of the POPI Act and GDPR, GLS Consulting is the *Data Controllers* and *Data Processors*, and our international service provider are only the *Data Processors* of your personal data.

Secure storage of data: CRM Data

No personal data from the website form is stored at GLS Consulting.

All data stored at our international service provider is securely stored and they have policies in place to protect the confidentiality of your personal data and to protect your personal data from loss, damage and unintended destruction.

We have license agreements in place with our international service providers. They all conform to GDPR or equivalent regulation and their data privacy policy is available on request from www.gls.co.za/consulting/contact.html. Should GLS Consulting be made aware in the unlikely case of a data breach at its international service providers, you will be informed via email, if you were affected.

Secure storage of data: Utility Billing Data

All Utility Billing Data is stored securely on GLS' internal servers in a secured server room. GLS employs internally patched Servers to host the data and applies group access with password security. Only staff who are part of the smallest required group have access to a specific project containing Utility Billing Data. As part of their employment contract, staff signed data confidentiality agreements.

Secure offsite backups are kept of all data, only accessible to GLS IT administrators.

Should GLS Consulting be made aware in the unlikely case of a data breach the Client will be informed via email.

Intended purpose and data sharing policies

Your personal data collected from website form data is solely collected and stored for use by selected staff at GLS Consulting to stay in contact with your and to market GLS Consulting products and services to you.

Personal data contained in Utility Billing Data is only used to report back to the Client, e.g. anomalies in consumption or billing.

The personal data will never be shared or sold by GLS Consulting to other third parties, unless required by court order, or requested in writing by the Client.

Data retention

GLS Consulting will retain personal data for as long as needed to provide the service to our client, subject to this policy and to comply with legal obligations. Records in the CRM with no activity, for longer than 3 years may be deleted periodically. Records in the Utility Billing Data may be depersonalised or deleted, depending on the agreement with the Client, at the end of the contract.

Your right to update your personal data: CRM Data

You can send a request via www.gls.co.za/contact.html where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity.

Your right to request a copy of your personal data: CRM Data

You may request a copy of all your personal data collected by GLS Consulting as a human readable PDF document via www.gls.co.za/contact.html where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity. You will be notified via email of completion of this task and the data will be available for download from a secure server.

Your right to delete your personal data: CRM Data

You can request to have all your personal data collected by GLS Consulting deleted via www.gls.co.za/contact.html where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity. You will be notified via email of completion of this task.

Your right to withdraw general consent: CRM Data

You can request to withdraw general consent for GLS Consulting to use your personal data collected by GLS Consulting via www.gls.co.za/contact.html where the request will be processed by a GLS

Consulting staff member within 30 days, after verifying your identity. You will be notified via email of completion of this task.

Your right to be notified should your personal data be provided to any other entity for legal reasons

Should your personal data have to be provided to another entity for legal reasons, you will be notified via email within 30 days.

Changes to the Privacy Policy: CRM Data

If we make substantial changes to this policy, we will notify you as contact in our CRM via email at least 30 days before they are implemented. Should you not want to accept the updated Privacy Policy, you have the right to have all your personal data deleted, by sending us a notification via www.gls.co.za/contact.html or email via info@gls.co.za within 30 days.

The latest copy will always be available on our website under, https://www.gls.co.za/privacy/

Additional data available on request: CRM Data & Utility Billing Data

A list of all personal data items with their purpose for the different systems is stored securely in a data inventory at our international CRM provider is available via www.gls.co.za/contact.html where the request will be processed by a GLS Consulting staff member within 30 days, after verifying your identity. You will be notified via email of completion of this task.

History of Changes

Ver 1.04: Updated 2021/04/29: Additional task to be implemented
Ver 1.05: Updated 2021/05/20: Minor corrections
Ver 1.06: Updated 2021/06/10: Minor corrections
Ver 1.07: Updated 2025/09/01: Minor corrections