

PRIVACY POLICY

2024



SOUTH AFRICA PRIVACY POLICY

Right to Object: You have a legal right to object at any time to:

- (i) use of your personal information for direct marketing purposes; and
- (ii) processing of your personal information, which is based on our legitimate interests, unless there are compelling legitimate ground for our continued processing

Jelocorp (Pty) Ltd ("we", "us" or "our" "Jelocorp") is committed to protecting the privacy of our candidates, clients and users of our website. We want to provide a safe and secure user experience. We will ensure that the information you submit to us, or which we collect, via various channels (including our website, through written correspondence (including e-mail), conversations or meetings with our consultants, or through any of our offices or websites globally), is only used for the purposes set out in this policy.

Through this Privacy Policy we aim to inform you about the types of personal data we collect from candidates, the purposes for which we use the data and the ways in which the data is handled. We also aim to satisfy the obligation of transparency under the **PROTECTION OF PERSONAL INFORMATION ACT, 2013** and national laws implementing it.

For the purpose of this Privacy Policy the controller of personal data is Jelocorp (and our contact details are set out in at the end of this Privacy Policy. References in this Privacy Policy to our Group of companies is to the parent company of **Jelocorp (Pty) Ltd, ("Jelocorp")**.

THE INFORMATION WE COLLECT

We will collect your personal details, including but not limited to your name and contact details (together with your e-mail address) and other relevant information from your Curriculum Vitae ("CV"). On occasion this will also include sensitive personal information such as details of confirming your identity, passport number, criminal convictions and ethnic origin. When we receive your details and CV electronically, this may be through a direct application on one of our websites, Jelocorp Recruitment email or an application that you have made through a third party job board.

JELOCORP GROUP_ PRIVACY POLICY_ JAN 2024

We will likely obtain further personal information about you during the course of our relationship with you. This information may be obtained from you directly or from third parties, such as organisations to whom we have provided your CV and who have engaged with you as part of a job application.

HOW WE COLLECT THE INFORMATION FROM YOU

We collect and receive information about you by information you provide to us directly (i.e. when you sign-up to utilise our services, by filling in forms on our website or those provided to you, when you enter a competition, promotion or complete a survey, by you posting comments or content on our social media pages or when you contact us or we contact you and you provide information to us directly.

We collect information when you use websites or social media platforms by using cookies, web beacons and other technologies. Depending on how you access and use websites, we may receive: Log information, Information we infer about you based on your interaction with products and services, Device information (for example the type of device you're using, how you access platforms, your browser or operating system and your Internet Protocol ("IP") address), you can obtain our cookies policy from our website developer more information. If you wish to reject our cookies, you can configure your browser to do so.

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

HOW WE USE YOUR PERSONAL INFORMATION

We will hold, use and disclose your personal information, for our legitimate business purposes including:

1. to provide our services to you;

JELOCORP GROUP_ PRIVACY POLICY_ JAN 2024

2. to maintain our business relationship, where you are a user of our website, a client or candidate;
3. to enable you to submit your CV for general applications, to apply for specific jobs or to subscribe to our job alerts. Please see the separate section on your CV below which outlines additional uses and disclosures;
4. to match your details with job vacancies, to assist us in finding a position that is most suitable for you and to send your personal information (including sensitive personal information) to clients in order to apply for jobs;
5. to retain your details and notify you about future job opportunities other than the specific role for which you have contacted us;
6. to answer your enquiries;
7. to direct-market products and services, advise you of news and industry updates, events, promotions and competitions, reports and other information. Before we do so, you will be given an option to opt-out of such communications and an option to unsubscribe will also be provided with each communication;
8. to fulfill contractual obligations with our clients;
9. to provide further services to you by sharing your personal information with other companies within our Group of companies as well as trusted third parties. Further details about this are set out in the separate section below on Sharing your Personal Information;
10. to release personal information to regulatory or law enforcement agencies, if we are required or permitted to do so;
11. our website uses a website recording service which can record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. Data collected by this service is used to improve our website usability. The information collected is stored and is used for aggregated and statistical reporting, and is not shared with anybody else.

12. In order to provide you with personalised content on our website, with more relevant communication in our emails, and with a tailored service from our consultants, we track and record your usage and interaction with our website and emails. We employ a third party service provider to help us record, store and analyse this information to determine how we might best deliver your engagement. We ensure that no personally identifiable attributes are recorded in this database and, other than our chosen service provider, we do not share this information with any other business or affiliate.

We may process, in accordance with local regulations, certain sensitive personal data (known as special category data in **PROTECTION OF PERSONAL INFORMATION ACT, 2013** where you include it in information you send to us e.g. if you include information about your health, religion or ethnic origin in the CV you send to us. We may also be required to conduct a criminal records check against your details. We have processes in place to limit our use and disclosure of such sensitive data other than where permitted by law.

THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

Under **PROTECTION OF PERSONAL INFORMATION ACT, 2013** the main grounds that we rely upon in order to process personal information of clients and candidates are the following:

(a) **Necessary for entering into, or performing, a contract** – in order to perform obligations that we undertake in providing a service to you, or in order to take steps at your request to enter into a contract with us, it will be necessary for us to process your personal data;

(b) **Necessary for compliance with a legal obligation** – we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;

(c) **Necessary for the purposes of legitimate interests** - either we, or a third party, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests

include responding to requests and enquiries from you or a third party, optimising our website and customer experience, informing you about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner;

(d) **Consent** – in some circumstances, we may ask for your consent to process your personal data in a particular way.

HOW WE SHARE YOUR PERSONAL INFORMATION

We are based in and operate from South Africa. Your information, including personal information, may be transferred to and maintained on servers located outside of your country of residence, where the data privacy laws, regulations and standards, may not be equivalent to the laws in your country of residence.

We might transfer your personal information to places outside of South Africa and store it there, where our suppliers might process it. **If that happens, your personal information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.**

Your use of our website, followed by your submission of information to us, represents your consent to such transfer. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy policy. In certain circumstances, we will share your personal information with other parties. Details of those parties are set out below along with the reasons for sharing it.

OTHER COMPANIES WITHIN OUR GROUP OUTSIDE SOUTH AFRICA

We may pass your personal information to, or allow access to such information by, other companies within our Group of companies worldwide so they can use it for the purposes set out above.

If you would like details of the particular companies within our Group which can access your personal information, please contact us at legal@jelocorp.com.

We apply equal rigour to the security of data held and processed across the whole of our global network. Each company within our Group of companies outside South Africa with access to data in South Africa enters into a specific data protection agreement with Jelocorp thereby undertaking to meet the same standards of data security and to act in accordance with data protection principles applicable under the strict European data protection laws. If you would like a copy of this agreement, please contact us at legal@jelocorp.com.

CLIENTS

We disclose your personal information to clients and potential clients who have vacancies for jobs in which you are interested.

TRUSTED THIRD PARTIES

We will share your personal information and, where necessary, your sensitive personal information with trusted third parties where we have retained them to provide services that you or our clients have requested, such as:

- employment reference checking;
- qualification checking;
- criminal reference checking (as required);
- verification of details you have provided from third party sources; and/or

JELOCORP GROUP_ PRIVACY POLICY_ JAN 2024

- psychometric evaluations or skills tests.

We will also share your personal information with third parties who perform functions on our behalf and provide services to us such as:

- professional advisors;
- data analytics providers;
- IT consultants carrying out testing and development work on our business technology systems;
- research and mailing houses; and/or
- function co-ordinators. We require minimum standards of confidentiality and data protection from such third parties.

To the extent that any personal information is provided to third parties outside the South Africa, or who will access the information from outside the South Africa, we will ensure that approved safeguards are in place.

REGULATORY AND LAW ENFORCEMENT AGENCIES

As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under **PROTECTION OF PERSONAL INFORMATION ACT, 2013** and other laws, we may disclose certain personal information to such bodies or agencies.

NEW BUSINESS OWNERS

If we or our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company and their advisors. If this happens, you will be sent notice of such event.



HOW LONG WE WILL HOLD YOUR INFORMATION

The length of time we will hold or store your personal information for will depend on the services we perform for you and for how long you require these. As we often support candidates with placements over many years, and potentially throughout their careers, the purpose for which we retain candidate data is often an ongoing purpose.

We conduct regular data-cleansing and updating exercises with our candidates to ensure that (a) the data that we hold is accurate and;

(b) we are not holding data for too long.

Our standard terms of business state that our clients should retain candidate data such as CVs for the purposes of the specific role you apply for and that, as controllers of your data, they should inform you if they plan to retain your CV on file in order to notify you about potential future roles, or to otherwise hold or use your data for other purposes.

YOUR RIGHTS ON INFORMATION WE HOLD ABOUT YOU

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

RIGHT TO NOT BE CONTACTED FOR MARKETING PURPOSES

You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" or "unsubscribe" options that we will always provide to you when we communicate with you. We won't send you marketing messages if you tell us not to but we will still need to send you service-related messages.

RIGHT OF ACCESS

You have the right at any time to ask us for a copy of the personal information about you that we hold. Where we have good reason, and if the PROTECTION OF PERSONAL INFORMATION ACT, 2013 permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

RIGHT OF CORRECTION

If personal information we hold about you is not accurate, out of date or incomplete, you have a right to have the data corrected, updated or completed. You can let us know by contacting us at legal@jelocorp.com.

RIGHT OF DESTRUCTION OR DELETION

In certain circumstances, you have the right to request that personal information we hold about you be destroyed or deleted e.g. if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

RIGHT TO OBJECT TO OR RESTRICT PROCESSING

In certain circumstances, you have the right to object to our processing of your personal information by contacting us at legal@jelocorp.com. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your personal information for direct marketing purposes.

JELOCORP GROUP_ PRIVACY POLICY_ JAN 2024

You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

RIGHT NOT TO BE SUBJECT TO A DECISION BASED SOLELY ON AUTOMATED PROCESSING

Jelocorp does not make decisions based solely on automated processing, including profiling.

You can exercise any of the above rights by contacting us at legal@jelocorp.com. Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

You have a right to contact us for more information about the safeguards we have put in place (to ensure the adequate protection of your Personal Data when this is transferred as mentioned above. You also have the right to non-discrimination when you exercise any of the above rights.

CONSENT

To the extent that we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us at legal@jelocorp.com

JOB ALERTS

To subscribe to job alerts emails, you will be required to provide your name and e-mail address, which will be used for the purpose of keeping you informed, by e-mail, of the latest jobs in your nominated industry and to provide you with industry news and other information related to our services.

JELOCORP GROUP_ PRIVACY POLICY_ JAN 2024

Should you decide that you no longer wish to receive this information, unsubscribe links are provided in every job alert email that you receive.

Job alerts emails are sent by Jelocorp or a company within our Group of companies. Where the sender is based outside South Africa your details will be sent to or accessed by that entity to enable them to issue the relevant job e-mail alert to you.

CURRICULUM VITAE

We give you the option of submitting your CV via our app or by providing your CV to one of our consultants/ recruiters. You can do this either to apply for a specific advertised job or for consideration by our recruitment consultants / recruiters for positions as they come up. Your CV will be stored in our database, and will be accessible by our recruitment consultants.

Your CV may also be emailed directly to other companies within our Group of companies for review and entry onto their database to enable them to provide their services to you. You are able to withdraw your permission for your data being processed outside South Africa upon completing your registration form with us.

You can update your CV at any time, simply by following the same procedure to submit a new CV. Your old CV will automatically be archived providing the submission details remain the same (for example you submit both CVs using the same email address or you advise the relevant contact of your new submission).

LINKS TO OTHER WEBSITES

Our website or social media platforms may contain links to and from websites, mobile applications or services of third parties, advertisers or affiliates. Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy statements of each website you visit which collects personal information.

OUR COMMITMENT TO SECURITY

While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. However, we do employ a number of safeguards intended to mitigate the risk of unauthorized access or disclosure of your information. We will do our best to protect your personal information and we will use up to date technology that will help us to do this. We will at all times comply with our obligation under applicable law.

CHANGES TO THIS PRIVACY POLICY

We may update this privacy policy from time to time. Any changes that we may make to our privacy policy will be posted on our website and will be effective from the date of posting. The security of your personal information is important to us.