

## **PROTECTION OF PERSONAL INFORMATION POLICY**

### **1. PURPOSE AND OBJECTIVE**

- 1.1. The purpose and objective of this policy is to give effect to the provisions of the Protection of Personal Information Act 4 of 2013 (hereinafter referred to as the POPI Act) to safeguard personal information.
- 1.2. SL Personnel (hereinafter referred to as “the company”) renders and/or market its human resources and recruitment services to its website users, clients as well as placing prospective candidates with clients for recruitment (hereinafter collectively referred to as “data subjects”) and in doing so, it collects, processes, store and share personal information of these data subjects.
- 1.3. This policy sets out the measures and standards for the protection and lawful processing of personal information of the data subjects concerned.
- 1.4. All employees, subsidiaries, business units, departments and individuals directly associated with the company are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer.
- 1.5. Any service provider that provides informational technology services, including data storage facilities, to the company must adhere to the requirements of the POPI Act to ensure adequate protection of personal information held by them on the company’s behalf.

### **2. MEASURES AND STANDARDS**

- 2.1. The company agrees that the collection, processing, storage and sharing of personal information obtained from data subjects is in compliance and in accordance with the laws applicable to the protection of personal information.
- 2.2. The company shall ensure that the data subjects are aware that their information is being collected, who is collecting their information by providing them with the company’s details and of the specific reason why the company is collecting their information. The company shall also ensure that the data subjects’ personal information is obtained with their consent.
- 2.3. The company will collect personal information directly from data subjects. Should



personal information be collected from a source other than directly from the data subjects, The company shall ensure that the data subjects are aware that their information is being collected, who is collecting their information by providing them with the company's details and of the specific reason why the company is collecting their information.

- 2.4. The company undertakes to only obtain personal information in a manner relevant for the specific purpose for which it is to be processed. Personal information shall not be processed further in a way that is incompatible with the purpose for which the information was collected initially.
- 2.5. Once the data subject's information is in the company's possession, it shall ensure that it will only process and release the data subject's personal information with their consent, except where the company is required to do so by law. In the latter instance, the company will inform the data subject thereof.
- 2.6. The nature of the personal information which is collected and processed by the company relates to information which includes but is not limited to names and surnames, addresses, contact details, tax information, banking details, identity numbers, medical records, criminal records, academic records and references.
- 2.7. Processing of the personal information includes, but is not limited to collection, receipt, recording, collation, storage, updating or modification, retrieval, adaption or alterations, consultation, use provision, dissemination by means of transmission, distribution or making available in any other form, erasure or deletion of data.
- 2.8. The company is responsible for ensuring that data subject information is complete, up to date and accurate before it is used. This entails that it may be necessary to request data subjects, from time to time, to update their personal information provided and confirm that it is still relevant. Should the company not be able to reach data subjects for this purpose, their information shall be deleted from the company's records.
- 2.9. Data subjects are entitled to know particulars of their personal information held by the company and to correct any personal information held by the company.
- 2.10. The company will take all reasonable steps to ensure that personal information obtained from data subjects is stored safely and securely.



- 2.11. The company shall ensure that technical and organisational measures are in place to ensure the integrity of personal information, and guard against the risk of loss, damage or destruction thereof. Personal information shall also be protected against any unauthorised or unlawful access or processing.
- 2.12. Notwithstanding the technical and organisational security measures taken by the company, manipulation by third parties or loss of data cannot be completely ruled out. In case of any data breach, the company will promptly report this to the affected data subject and the relevant authority.

### **3. INFORMATION OFFICER AND OPERATIONAL CONSIDERATIONS**

- 3.1. The Information Officer shall be responsible for administering and overseeing the implementation of this policy and, as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes.
- 3.2. All employees, subsidiaries, business units, departments and individuals directly associated with the company are to be trained, according to their functions, in the regulatory requirements and guidelines as set out in this policy's measures and standards to govern the protection of personal information. The company will conduct periodic reviews and audits, where appropriate, to ensure compliance with this policy and its guidelines.
- 3.3. The details of the Information Officer can be obtained directly from the company should there be any questions and/or queries pertaining to this policy.

### **4. AMENDMENTS, BREACH AND RIGHT TO DISCIPLINE**

- 4.1. Amendments of this policy will take place on an ad hoc basis as or when required by the company.