

POPIA Privacy Policy - Candidates

Effective date: 1 July 2021

Smilers Selection CC is committed to protecting the privacy of personal information of our data subjects. The information you share with us as a data subject allows us to provide you with the best experience with our products and services, or as a stakeholder of Smilers Selection CC.

It is important that you take all necessary and appropriate steps to protect your data yourself (for example, by ensuring that all passwords and access codes are kept secure).

Smilers Selection CC has dedicated policies and procedures in place to protect all personal information collected and processed by us. Please read below for more information on how we collect, process, use and disclose personal information.

Registered address: 17 Dennendal Avenue-East, Tokai Cape Town, South Africa, 7945

Information officer contact details: +27 21 686 0611 or ros@smilers.co.za

Collection of data

Personal data may either be collected directly from you, as data subject, or it may be collected from other sources such as:

- a) From your previous employers
- b) Through credit and criminal checks
- c) Educational institutions
- d) Other relevant sources relating to your application for employment

Where information is not collected directly from you as a data subject, we will take reasonable steps to inform you of the fact that the information was collected and will be processed.

You must not send us personal information about someone else without first getting his or her consent for it to be used and disclosed in the ways set out in this terms and conditions. This is because we will assume he or she has consented although we may still ask for confirmation from them. Where you do give us information about someone else, or someone else discloses a connection with you, that information may be taken into account with your other personal information.

Smilers Selection CC will keep your personal information confidential at all times, however, you agree and consent that Smilers Selection CC may:

- a) Communicate with you electronically in relation with the service or product being provided (email, fax, telephone or through any other relevant or secured electronic platform)
- b) Obtain any relevant personal information, from any person or institution, necessary to comply with the agreement between you and Smilers selection CC

- c) Obtain credit information from any person or institution where necessary
- d) Verify the information provided herein and to contact other third party for purposes of the same
- e) Disclose personal information to regulatory or government agencies in accordance with the relevant legislation or directive
- f) Use personal information to market new or other products of the company which may be suitable or relevant to you

Consent

Where the legal basis for us processing your personal information is consent as above, it will be included in the contract or agreement concluded with you. This consent may be withdrawn at any time, however this withdrawal of consent will not make processing we undertook before your withdrawal unlawful. You will not suffer any detriment for withdrawing your consent.

You may withdraw your consent by contacting our information officer, whose details are provided at the beginning of the privacy policy.

Where the legal basis for processing is for the proper performance of the contract, and you fail to provide us with the information or request us to stop processing this information, it may create limitations on our performance of the contract or agreement.

Sharing information

In processing your personal information, we may share it with third party processors under an operator's agreement. These include but are not limited to:

- a) Payment processors
- b) Email management and distribution tools
- c) Data storage providers
- d) Server hosts

As an operator, these service providers will not be able to process or use your data for any reason other than to provide the service as required by us. They also need to implement proper safeguards to ensure the personal information is secured at all times.

Retention

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 legal rights

You have the following rights under the Protection of Personal Information Act:

- a) Request access to your personal information
- b) Request a correction or deletion of personal information
- c) Object to the processing of personal information
- d) Lodge a complaint to the Information Regulator

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your personal information, please contact the information officer.

Email Disclaimer

Personal information contained in emails received from candidates will only be processed for the purposes obtained as disclosed in our privacy policy. Data subjects who email Smilers Selection CC notes that even though personal information contained in emails may not be processed, it will be stored on the email server as part of the received email itself. Smilers selection CC has safeguards in place to ensure the confidentiality of this personal information.

Changes to this policy

This policy may change from time to time. The latest effective date will be highlighted at the start of the privacy policy.