JEQE Management

HR PROCESSING NOTICE

1. PURPOSE OF THIS NOTICE AND TERMS

1.1 In order to do business, JEQE Management (Pty) Ltd, bearing Registration Number 2023/542894/07 ("we", "us", "JEQE" or "the company") in our capacity as a Responsible Party, will have to process Personal Information, and in doing so, will have to comply with a law known as the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as "POPIA"), which regulates and controls the processing of a legal entity's and/or an individual's Personal Information in South Africa, (hereinafter referred to as a "Data Subject"), which processing includes the collection, use, and transfer of a Data Subject's Personal Information.

1.2 In terms of POPIA, where a person processes another's Personal Information, such processing must be done in a lawful, legitimate and responsible manner and in accordance with the provisions, principles and conditions set out under POPIA.

1.3 In order to comply with POPIA, a Responsible Party processing a Data Subject's Personal Information must:

1.3.1 provide the Data Subject with a number of details pertaining to the processing of the Data Subject's Personal Information, before such information is processed; and

1.3.2 get permission or consent, explicitly or implied, from the Data Subject, to process his / her / its Personal Information, unless such processing:

- is necessary to carry out actions for the **conclusion or performance of a contract** to which the Data Subject of the Personal Information is a party;
- is required in order to comply with an **obligation imposed by law**; or
- is for a **legitimate purpose or is necessary to protect the legitimate interest (s) and/or for pursuing the legitimate interests** of i) the Data Subject; ii) the Responsible Party; or iii) that of a third-party to whom the Personal Information is supplied; or
- is necessary for the proper performance of a **public law duty**.

1.4 In accordance with the requirements of POPIA, and because your privacy and trust is important to us, we set out below how we, JEQE collect, use, and share your Personal Information and the reasons why we need to use and process your Personal Information.

2. APPLICATION

2.1 This Processing Notice applies to the following persons:

2.1.1 **Applicants:** persons who wish to apply for an employment position within JEQE, or who wish to apply for a learnership or bursary, scholarship, or study assistance;

2.1.2 **learnership or bursary recipients:** persons who have been granted a bursary, learnership, scholarship, or study assistance by JEQE;

2.1.2 **Employees:** persons who are employed by JEQE.

3. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION

3.1 Your Personal Information will be processed by us for the following purposes:

SUMMARY OF THE PURPOSE OF COLLECTION	**Lawfulness Consent required**
Due diligence purposes – legitimate purpose: To carry out a due diligence before we decide to engage or interact with you, including obtaining and verifying your credentials, including your personal details, medical status, health history and related records, education and employment history and qualifications, credit and financial status and history, tax status, B-BBEE status, and or any performance or employee related history. **Lawfulness - YES** **Consent required - NO**	
Employment - potential – legitimate purpose: To conduct and communicate with you regarding recruiting, potential employment and human resources administration. **Lawfulness - YES** **Consent required – NO**	
Employment - actual - to contract with you: To conclude an employment contract with you, and to manage the employment relationship including managing you, communicating with you regarding your employment, performing human resources administration, operational, financial, and organizational matters, providing you with training and skills development, providing you with employee benefits such as pension and medical aid benefits, and conducting performance assessments and disciplinary matters. **Lawfulness - YES** **Consent required - NO**	

Potential scholarships, bursaries, study assistance, learnerships recipients – legitimate purpose: To investigate whether we are able or willing to conclude a contract with you based on the findings of any due diligence, and if in order to conclude a scholarship, bursary, study assistance, or CSI contract.

Lawfulness - YES
Consent required - NO

Scholarships, bursaries, study assistance, and learnership recipients – to contract with you: To conclude a contract with you, and to manage the relationship.

Lawfulness - YES
Consent required - NO

Attending to financial matters pertaining to your employment - contract and legitimate purpose: To administer payroll including payment of statutory levies, deductions, fees owed to Organization, registrations, subscriptions, or payment of refunds.

Lawfulness - YES
Consent required - NO

Communications - legitimate purpose: To make contact with you and to communicate with you generally or specifically, i.e. in respect of our or your requirements, or instructions, or to respond to you in order to comply with your specified or general instructions.

Lawfulness - YES
Consent required - NO

Risk assessment and anti-bribery and corruption matters - **legitimate purpose:** To carry out organizational and enterprise wide risk assessments, in order to detect and prevent bribery, corruption, fraud and abuse, to comply with ABC laws, as well as to identify and authenticate your access to our assets, systems, goods, services or premises and generally to ensure the security and protection of all persons including employees, and persons when entering or leaving our sites and/or to exercise our rights and to protect our and others' rights and/or property, including to take action against those that seek to violate or abuse our assets, systems, services, customers or employees and/or other third parties where applicable.

Lawfulness - YES
Consent required - NO

Legal rights, duties and obligations and insurance matters - comply with law and protect legitimate interests: To comply with the law and our legal obligations, exercise legal rights and duties, including to register with Regulators, obtain and hold permits and certificates, ensure a safe and healthy work environment, register for VAT, Tax, PAYE, SDL, COIDA and UIF etc, provide medical care and facilities, to submit reports or provide various notices or returns, to litigate, to proceed to protect the company's legal rights, collect debts or enforce contractual or employment rights, and/or to respond to a request or order from a SAPS official, investigator or court official, regulator, or public authority and/or to manage and attend to insurance matters.

Lawfulness - YES
Consent required - NO

Security purposes - legitimate purpose and to comply with laws: To permit you access to our offices, facilities, manufacturing or parking areas, as well as to controlled areas, for the purposes of monitoring via CCTV, your interaction and access in and from our facilities described above, and for general risk management, security and emergency incident control purposes as well as for data and cybersecurity purposes.

Lawfulness - YES
Consent required - NO

Operational issues - compliance with law and manage the contract: To communicate, enforce and ensure you comply with policies, including in relation to claims, disciplinary actions or legal requirements and conducting investigations and incident response, including reviewing your communications in these situations in accordance with relevant internal policies and applicable law.

Lawfulness - YES
Consent required - NO

Occupational health - **compliance with laws:** To manage occupational health and absence and fitness for work and notifying family members in emergencies and to manage COVID-19.

Lawfulness - YES
Consent required - NO

Travel - contractual: To facilitate business travel, travel-related support including conference attendance, bookings, and emergency support services.

Lawfulness - YES
Consent required - NO

B-BBEE - compliance with laws: To monitor equal employment opportunities, in respect of diversity categories including but not limited to age, gender, ethnicity, nationality, religion, disability, sexual orientation, and marital or family status.

Lawfulness - YES
Consent required - NO

IR and Labour relations - compliance with laws: To manage membership to trade unions and collective agreements for administering collective employee arrangements where these are in place **Lawfulness - YES** **Consent required - NO**
For internal research and development purposes - **Legitimate purpose:** To conduct internal research and development. **Lawfulness - YES** **Consent required - NO**
Effectuate the sale, merger, acquisition, or other disposition of our business (including in connection with any bankruptcy or similar proceedings) - Legitimate interest: to comply with our legal obligations and to change our business structure we may disclose your Personal Information in connection with proceedings or investigations anywhere in the world to third parties, such as public authorities, law enforcement agencies, regulators and third-party litigants. We may also provide relevant parts of your Personal Information to any potential acquirer of or investor in any part of the Group's business for the purpose of that acquisition or investment. **Lawfulness - YES** **Consent required - NO**

4. WHAT PERSONAL DATA OR INFORMATION DO WE COLLECT FROM YOU?

4.1 In order to engage and/or interact with you, for the purposes described above, we will have to process certain types of your Personal Information, as described below:

Your contact information, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar contact data, and other contact information including details of your previous employers serial numbers of equipment, details regards the possession of dangerous weapons, memberships or affiliations, including professional bodies and trade unions, and similar data, which are required for various legitimate interest, contractual and/or lawful reasons pertaining to your application for employment or actual employment with the Organization or pertaining to your application for a scholarship, bursary, learnership or study assistance or where you are granted a scholarship, bursary, learnership or study assistance. **Lawfulness - YES** **Consent required - NO**
Career, Education, and Employment Related Information, such as job preferences or interests, work performance and history, salary history, nationality and immigration status, demographic data, professional licensure information and related compliance activities, accreditations and other accolades, education history (including schools attended, academic degrees or areas of study, academic performance, and rankings), and similar data, which are required for contractual or employment related matters or which are required to comply with laws and public duties. **Lawfulness - YES** **Consent required - NO**
Specific identifiers, known as **Special Personal Information**, which are required in order to protect legitimate interests, comply with legal obligations or public legal duties, or in order to accommodate you in our workplaces, such as your race, disability-related information (B-BBEE related)**,** religion (correct and fair treatment related), sexual and medical history including any medical conditions (to comply with laws and related to correct and fair treatment issues), trade union matters (to comply with laws and related to correct and fair treatment issues), and financial, credit, deviant and criminal history, (to protect our legitimate interests and to perform risk assessments), as well as children's details (benefits related) and Biometrics such as finger prints, which are required in order to provide you with access to our facilities, give you access to our IT infrastructure, for security monitoring purposes and in order to comply with health and safety requirements in the workplace. **Lawfulness – YES** **Consent required – NO**

Demographic Information, such as country, preferred language, age and date of birth, marriage status, gender, physical characteristics, personal or household / familial financial status and metrics, and similar data, which are required for various legitimate interests, as well as contractual and/or other legal reasons.

Lawfulness – YES
Consent required – NO

Your Image, still pictures, video, voice, and other similar data, which are required in order to provide you with access to our facilities, give you access to our IT infrastructure, for security monitoring purposes as well for various public relations and corporate affairs purposes.

Lawfulness – YES
Consent required – NO

Public issued Identity Information, such as government-issued identification information, tax identifiers, social security numbers, other government-issued identifiers, and similar data, which are required to comply with laws and public duties.

Lawfulness – YES
Consent required – NO

Tax and Financial Information, banking details, and tax registration number and status, which are required to perform contractual matters and to comply with tax laws and public duties.

Lawfulness – YES
Consent required – NO

IT Information, including IT security-related information (including IT user names and passwords, authentication methods, and roles), and similar data, which are required for various legitimate and legal purposes.

Lawfulness – YES
Consent required – NO

Health history and records, which is classified as Special Personal Information, such as medical status and history, examinations, blood type, medical aid history, disability-related information, biometrics, medicals, psychometrics and similar data, which are required for contractual or employment related matters or which are required to comply with laws and public duties.

Lawfulness – YES
Consent required – NO

Social Media and Online activities and presence, such as information placed or posted in social media and online profiles, online posts, and similar data, which are required for contractual or employment related matters or which are required to comply with laws and public duties.

Lawfulness – YES
Consent required – NO

5. SOURCES OF INFORMATION - HOW AND WHERE DO WE COLLECT YOUR PERSONAL INFORMATION

5.1 Depending on your requirements, we will collect and obtain Personal Information about you either directly from you, from certain third parties or from other sources which are described below:

Direct collection

You provide Personal Information to us when you:

- interact with us;
- enquire about, or apply for a position within the JEQE, including requesting or signing up for information;
- express an interest in working with us or apply for a job or position or bursary, learnership or scholarship with us;
- take up a job or position with us;
- conclude a contract with us;
- communicate with us by phone, email, chat, in person, or otherwise;
- complete a questionnaire, or other information request form.

Automatic collection

We collect Personal Information automatically from you when you:

- search for, visit, interact with, or use our websites, applications, mobile applications, or social media portals or platforms;
- access, use, or download content from us;
- open emails or click on links in emails or advertisements from us;
- Otherwise interact or communicate with us.

Collection from third parties

We collect Personal Information about you from third parties, such as:

- recruitment or employment agencies, previous employees and colleagues;
- your previous employer;
- regulators, professional or industry organizations and certification / licensure agencies that provide or publish Personal Information related to you;
- third parties and affiliates who deal with or interact with us or you;
- service providers and business partners who work with us and that we may utilize to deliver services;
- SAPS, Home Affairs, Credit bureaus and other similar agencies;
- Government agencies, regulators and others who release or publish public records;
- Other publicly or generally available sources, such as social media sites, public and online websites, open databases, and data in the public domain.

6. HOW WE SHARE INFORMATION

6.1 We share Personal Information for the purposes set out in this Processing Notice with the following categories of recipients:

Our employees, and our affiliates. We may share your Personal Information amongst our employees, affiliates and the companies within the JEQE for employment, HR, IR, business and operational purposes. **Lawfulness – YES** **Consent required – NO**
Your Contacts and other employees. We may share your Personal Information with other JEQE employees, with others with whom you or we have a relationship with, in order to fulfil or perform a contract or other legal obligation, including with third parties that arrange or provide us or you with goods or services. **Lawfulness – YES** **Consent required – NO**
Business Partners and Third-Party Service Providers, as well as Operators. We may share your Personal Information with our third-party service providers to perform tasks on our behalf and which are related to our relationship with you, including financial, benefits, health and medical, and wellness benefits etc and to assist us in offering, providing, delivering, analysing, administering, improving, and personalizing such services or products. **Lawfulness – YES** **Consent required – NO**
Third-Party Content Providers. We may share your Personal Information with our third-party content providers to perform tasks on our behalf and to assist us in providing, delivering, analysing, administering, improving, and personalizing content related to our relationship with you, including financial, benefits, health and medical, and wellness benefits etc and may to this end pass certain requests from you to these providers. **Lawfulness – YES** **Consent required – NO**
Cyber Third-party Service Providers. We may share your Personal Information with our third-party cyber service providers to perform tasks on our behalf and which are related to our relationship with you, including those who provide technical and/or customer support on our behalf, who provide application or software development and quality assurance, who provide tracking and reporting functions, research on user demographics, interests, and behaviour, and other products or services. These third-party service providers may also collect Personal Information about or from you in performing their services and/or functions. We may also pass certain requests from you to these third-party service providers. **Lawfulness – YES** **Consent required – NO**

Advertisers. We may share your Personal Information with advertisers, advertising exchanges, and marketing agencies that we engage for advertising services, to deliver advertising, and to assist us in advertising our brand and products and services.

Lawfulness – YES
Consent required – NO

Regulators and law enforcement agencies. We may disclose your Personal Information to regulators and other bodies in order to comply with any applicable law or regulation, to comply with or respond to a legal process or law enforcement or governmental requests. We may also disclose your Personal Information in connection with proceedings or investigations anywhere in the world to third parties, such as public authorities, law enforcement agencies, regulators and third-party litigants.

Lawfulness – YES
Consent required – NO

Potential sale transactors: We may provide relevant parts of your Personal Information to any potential acquirer of or investor in any part of JEQE's business for the purpose of that acquisition or investment.

Lawfulness – YES
Consent required – NO

Other Disclosures. We may disclose your Personal Information to third parties if we reasonably believe that disclosure of such information is helpful or reasonably necessary to enforce our terms and conditions or other rights (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of the group, our employees, any users, or the public.

Lawfulness – YES
Consent required – NO

7. SECURITY OF INFORMATION

7.1 The security of your Personal Information is important to us. Taking into account the nature, scope, context, and purposes of processing Personal Information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organisational measures designed to protect the security of Personal Information. In this regard we will conduct regular audits regarding the safety and the security of your Personal Information.

7.2 Your Personal Information will be stored electronically and in some cases in hard copy in files and records, which information, for operational reasons, will be accessible to and or provided to persons employed or contracted by us on a need to know basis.

7.3 Once your Personal Information is no longer required due to the fact that the purpose for which the Personal Information was held has come to an end, such Personal Information will be retained in accordance with JEQE records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We calculate retention periods based upon and reserve the right to retain Personal Information for the periods that the Personal Information is needed to: (a) fulfil the purposes described in this Processing Notice, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

7.4 Notwithstanding the contents housed under clauses 7 and 8, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect Personal Information, we cannot guarantee its absolute security.

8. ACCESS BY OTHERS AND CROSS BORDER TRANSFER

8.1 JEQE may from time to time have to disclose your Personal Information to other parties, including the JEQE subsidiaries, trading partners, agents, auditors, organs of state, regulatory bodies and/or national governmental, provincial, or local government municipal officials, or overseas trading parties or agents, but such disclosure will always be subject to an agreement which will be concluded as between ourselves and the party to whom we are disclosing your Personal Information to, which contractually obliges the recipient of your Personal Information to comply with strict confidentiality and data security conditions.

8.2 Where Personal Information and related data is transferred to a country which is situated outside South Africa, your Personal Information will only be transferred to those countries which have similar data privacy laws in place or where the recipient of the Personal Information concludes an agreement which contractually obliges the recipient to comply with strict confidentiality and data security conditions and which in particular will be to a no lesser set of standards than those imposed by POPIA.

9. YOUR RIGHTS

9.1 You as a Data Subject have certain rights, which are detailed below:

- **The right of access** - You may ask JEQE (free of charge) to confirm that we hold your Personal Information, or ask us to provide you with details, (at a fee) on how we have processed your Personal Information, which request must be done by following the process set out under the JEQE PAIA Manual.

- **The right to rectification** - You have the right to ask us to update or rectify any inaccurate Personal Information which we hold of yours, which can be done by accessing the update / rectification request.

- **The right to object to and restrict further processing** - Where we do not need your consent to process your Personal Information, but you are not in agreement with such processing, you may lodge an objection to such processing by accessing the objection request.

- **The right to withdraw consent** - Where you have provided us with consent to process your Personal Information, you have to right to subsequently withdraw your consent, which can be done by accessing the withdrawal of consent request.

9.2 These rights may be exercised by using the relevant forms housed on the JEQE Website at : https://jeqe.co.za

10. CHANGES TO THIS PRIVACY STATEMENT

10.1 As JEQE changes over time, this Processing Notice is expected to change as well.

10.2 JEQE reserves the right to amend the Processing Notice at any time, for any reason, and without notice to you other than the posting of the updated Processing Notice on the JEQE Website.

10.3 We therefore request that you to visit our Website frequently in order to keep abreast with any changes.

11. PROCESSING OTHER PERSONS' PERSONAL INFORMATION

11.1 If you process another's Personal Information on JEQE's behalf, or which we provide to you in order to perform your contractual or legal obligations or to protect any legitimate interest, you will

- if you are processing such Personal Information as our Operator as defined under POPIA, process all and any such Personal Information in compliance with the obligations set out under our standard "Operator Agreement" housed on our website; or

- where not acting as an Operator, nonetheless keep such information confidential and secure as per POPIA and you will not, unless authorized to do so, process, publish, make accessible, or use in any other way such Personal Information unless in the course and scope of your duties, and only for the purpose for which the information has been received and granted to you, and related to the duties assigned to you.

12. COMPLAINTS OR QUERIES - CONTACT US

12.1 Any comments, questions or suggestions about this Processing Notice or our handling of your Personal Information should be emailed to our Information or Deputy Information officers at the details below.

Information Officer	**Deputy Information Officer**
Name: Ritesh Maharaj **Address:** Unit 8 Block B First Floor, 34 Impala Road, Chiselhurston, Gauteng, 2196 **Tel:** 011 884-4717 **Email:** riteshm@jeqe.co.za	**Name: Thulani Mciwa** Unit 8 Block B First Floor, 34 Impala Road, Chiselhurston, Gauteng, 2196 **Tel:** 011 884-4717 **Email:** thulani@jeqe.co.za

12.2 Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

12.3 Our offices are open 9:00 am – 4.00 pm GMT, Monday to Friday.

12.4 Should you feel unsatisfied with our handling of your Personal Information, or about any complaint that you have made to us, you are entitled to escalate your complaint to the South African, Information Regulator who can be contacted at <https://www.justice.gov.za/inforeg/>.

13. ACCEPTANCE AND BINDING NATURE OF THIS DOCUMENT

13.1 By providing the JEQE with the Personal Information which we require from you as listed under this Processing Notice:

- you acknowledge that you understand why your Personal Information needs to be processed;
- you accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross-border;
- where consent is required for any processing as reflected in this Processing notice, you agree that we may process this particular Personal Information.

13.2 Where you provide us with another person's Personal Information for processing, you confirm that you have obtained the required permission from such person(s) to provide us with their Personal Information for processing.

13.3 The rights and obligations of the parties under this Processing Notice will be binding on, and will be of benefit to, each of the parties' successors in title and/or assigns where applicable.

13.4 Should any of the Personal Information concern or pertain to a legal entity whom you represent, you confirm that you have the necessary authority to act on behalf of such legal entity and that you have the right to provide the Personal Information and/or the required permissions in respect of the processing of that Organization or entities' Personal Information.

End