

PROTECTION OF PERSONAL INFORMATION ACT POLICY

SET Recruitment Consultants (Pty) Ltd is committed to compliance with and adheres to the Protection of Personal Information Act 4 of 2013 and confirm that we are compliant with this legislation.

1. INTRODUCTION

The POPI Act requires SET Recruitment Consultants (Pty) Ltd to:

- 1.1 Sufficiently inform candidates/applicants/jobseekers (data subjects), hereinafter referred to as candidates, the purpose for which we will process their personal information
- 1.2 Protect our information threats, whether internal or external, deliberate, or accidental to ensure business continuation, minimise business damages and maximise business opportunities.

This Policy and Compliance Framework establishes measures and standards for the protection and lawful processing of personal information within our organisation and provides principles regarding the right of individuals to privacy and to the reasonable safeguarding of their personal information.

1.3 The Information Officer

The Information Officer is responsible for:

- 1.3.1 The monitoring of this policy
- 1.3.2 Ensuring that this policy is supported by appropriate documentation
- 1.3.3 Ensuring that this policy and subsequent updates are communicated to relevant managers, representatives, staff, and associates, where applicable.

All employees are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer.

Service Providers that provide IT and/or Off-site Data Storage services, to our organisation must satisfy us that they provide adequate protection of data held by them on our behalf.

2. POLICY PRINCIPLES

2.1 Principle 1: Accountability

- 2.1.1 We shall take reasonable steps to safeguard all Data and Personal Information collected from Candidates for the purpose of Permanent or Temporary recruitment and ensure that the data is stored safely and securely.

2.2 Principle 2: Processing Limitation

- 2.2.1 We will collect personal information directly from candidates
- 2.2.2 Personal Information from Social Networks and Job-seeker portals will be collected with express consent of the Candidate/s

2.2.3 Once in our possession we will only process or further process candidate information with their consent, except where we are required to do so by law. In the latter case we will always inform the candidate.

2.3 Principle 3: Specific Purpose

2.3.1 Personal information is collected from candidates to enable us to represent them to our clients for the purpose of recruitment.

2.4 Principle 4: Limitation on Further Processing

2.4.1 Personal information may not be processed further in a way that is incompatible with the purpose for which the information was collected for initially. We collect personal information for recruitment and it will only be used for the sole purpose thereof.

2.5 Principle 5: Information Quality

2.5.1 We are responsible for ensuring that candidate information is complete, up to date and accurate before we use it. This means that it may be necessary to request candidates from time to time to update their information and confirm that it is still relevant. If we are unable to reach a candidate for this purpose, their information will be deleted from our records.

2.6 Principle 6: Transparency/Openness

2.6.1 Where personal information is collected from a source other than directly from a candidate (e.g., social media, job portals) we are responsible for ensuring that the candidate is aware that their information is being collected, who is collecting the information by providing them with our details and inform them of the specific reason why their information is being collected.

2.7 Principle 7: Security Safeguards

2.7.1 We will ensure technical and organisational measures to secure the integrity of personal information and guard against risk of loss, damage, or destruction thereof. Personal information must also be protected against any unauthorised or unlawful access or processing. We are committed to ensure that information is used for legitimate purposes with candidate consent and only by authorised employees within our organisation.

2.7.2 We will implement sufficient measures to guard against the risk of unlawful access, loss, damage, or destruction of personal information that is held:

2.7.2.1 physically

2.7.2.2 in our electronic data base

2.7.2.3 by a Data Storage Service Provider

2.7.2.4 in any electronic devices (that will be Password protected)

2.7.3 Data encryption of storage devices will be installed

2.7.4 Once a candidate process has been concluded (e.g. successfully placed/ declined), all candidate files containing personal information shall be stored in the storage room and may be retrieved upon request.

2.7.5 Personal information shall only be printed as and when necessary for interview purposes and if not in use, safely file or shred the documents

2.8 Principle 8: Participation of Individuals

2.8.1 Candidates are entitled to know particulars of their personal information held by SET Recruitment Consultants (Pty) Ltd as well as the identity of any authorised employees within the organisation that has/had access thereto. They are entitled to correct any data/information held by the organisation.

3. PARTICIPATION OF INDIVIDUALS/COMPLAINTS

- 3.1 Candidates are entitled access to, and to correct any information held by us
- 3.2 Complaints should be submitted in writing to the Information Officer for Resolution
- 3.3 Requests to Access, Correct or Delete information must be made on the attached Annexures 1 and 2 and submitted to the Information Officer.

4. OPERATIONAL CONSIDERATIONS

4.1 Monitoring

- 4.1.1 The Board/Management and Information Officer are responsible for ensuring adherence to Standard Operating Procedures
- 4.1.2 All employees and individuals directly associated with recruiting activities will be trained in the regulatory requirements governing the protection of Personal Information
- 4.1.3 We will conduct periodic reviews and audits, where appropriate, to ensure compliance with this policy and guidelines

4.2 Policy Compliance

- 8.2.1 Breach/es of this policy could result in disciplinary action and/or termination of employment.

5. COMPANY INFORMATION

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