

POPIA POLICY MANUAL AND COMPLIANCE FRAMEWORK

(Prepared in terms of Chapter 3 - Part A of the Protection of Personal Information Act, 2013 - POPIA)

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1. Introduction

NCLC is a generalist Recruitment and Human Resources Solutions Company. We provide a professional recruitment service to companies across a broad spectrum of disciplines. We assist with:

Temporary Employment Services, Permanent Staffing Solutions, Independent Payroll Solutions and Verification Checks.

As the Responsible Party, NCLC is committed to complying with The Protection of Personal Information (POPI) Act which requires us to:

- 1.1. Sufficiently inform candidates/applicants/jobseekers (data subjects), hereafter referred to as candidates, of the purpose for which we will process their personal information.
- 1.2. Protect our Information assets from threats, whether internal or external, deliberate, or accidental, to ensure business continuation, minimize business damage and maximize business opportunities.

This policy and compliance framework establishes measures and standards for the protection and lawful processing of personal information within the Company and provides principles regarding the right of an individual to privacy and the reasonable safeguarding of their personal information.

All employees, subsidiaries, business units, departments and individuals directly associated with NCLC are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer.

Any Service Provider that provides Information Technology services, including data storage facilities, to our organization must adhere to the requirements of the POPI Act to ensure Adequate protection of personal information held by them on our behalf. Written confirmation to this effect must be obtained from relevant service providers.

2. Purpose

The purpose of this policy is to inform candidates and enable NCLC to:

- 2.1. Comply with the laws in respect of all personal information it holds about candidates;
- 2.2. Follow good practice;
- 2.3. Protect NCLC's reputation;
- 2.4. Protect NCLC from the consequences of a breach of its responsibilities;
- 2.5. Protect the candidates against loss or breach of their personal information.

3. Policy Principles

3.1. Accountability

- NCLC will take reasonable steps to ensure that all personal information obtained from candidates is stored safely and securely.
- This includes CVs, References, Qualifications, Integrity Checks and any other personal information that may be obtained for candidate representation.

3.2. Processing Limitation

- NCLC will collect personal information directly from candidates.
- NCLC will obtain personal information from its website where candidates register and apply for positions.
- Once in our possession, NCLC will only process or release candidate information with a candidate's consent, except where we are required to do so by law. In the latter case NCLC will always inform the candidate.

3.3. Specific Purpose

- NCLC collect personal information from candidates for presentation to our clients for the purpose of recruitment.

3.4. Limitation on Further Processing

- Personal information may not be processed further in a way that is incompatible with the purpose for which the information was collected initially. NCLC collect personal information for recruitment purposes. It will only be used for this purpose.

3.5. Information Quality

- NCLC is responsible for ensuring that candidate information is complete, up-to-date and accurate before use. 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.

3.6. Transparency/Openness

- Where personal information is collected from a source other than directly from a candidate (EG social media, recruitment portals, etc.) NCLC is responsible for ensuring that the candidate is aware:
 - That their information is being collected;
 - Who is collecting their information by giving them our details;
 - Of the specific reason for the collection of their information.

3.7. Security Safeguards

- NCLC will ensure technical and organisational measures to secure the integrity of personal information.
- Guard against the risk of loss, damage, or destruction thereof. Personal information must also be protected against any unauthorised or unlawful access or processing.
- NCLC is committed to ensuring that information collected is only used for legitimate purposes with candidate consent and only by authorised employees of our agency.

3.8. Participation of Individuals

- Candidates are entitled to know the particulars of their personal information held by NCLC, as well as the identity of any authorised employee of our Company that has access thereto.
- Candidates are entitled to correct any information at any time.
- Candidates are entitled to request NCLC to remove their information from its records at any time.

4. Operational Considerations

4.1. Monitoring

- Management and the Information Officer are 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.
- All employees, subsidiaries, business units, departments and individuals directly associated with NCLC are to be trained, according to their functions, in the regulatory requirements, policies and guidelines that govern the protection of personal information.
- NCLC will conduct periodic reviews and audits, where appropriate, to ensure compliance with this policy and guidelines.

4.2. Operating controls

NCLC will establish appropriate standard operating procedures that are consistent with this policy and regulatory requirements. This will include:

- Allocation of information security responsibilities.
- Incident reporting and management.
- User ID addition or removal.
- Information security training and education.
- Data backup.

5. Storage of Information

NCLC makes use of a cloud storage service and the server which holds our information is based in the USA. In terms of Section 72 of the POPIA, NCLC must adhere to the following conditions:

- The recipient of the information (cloud service) is subject to a law which regulates trans-border information flow and personal information in a way which is substantially similar to POPIA;
- NCLC must obtain a candidate's consent;
- NCLC must inform a candidate where his/her information is stored.

The cloud services utilized by NCLC is fully compliant with The General Data Protection Regulation (GDPR) which is globally recognized. The GDPR is a unified framework of data privacy rules which is similar to that of the POPIA and it imposes strict regulations on how organizations collect, store and manage personal information.

The cloud service has a dedicated team of security experts who constantly monitors and improves its security policies to help protect data in line with the provisions of the GDPR. NCLC's data is stored on their USA servers for as long as we need and we have the ability to the complete removal of information at any moment in time.

6. Company and Information Officer Details

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The Information Officer is responsible for:

- Conducting a preliminary assessment;
- The development, implementation and monitoring of this policy and compliance framework;
- Ensuring that this policy is supported by appropriate documentation;
- Ensuring that documentation is relevant and kept up to date;
- Ensuring this policy and subsequent updates are communicated to relevant recruiters, consultants, representatives and associates, where applicable.

7. Policy Compliance

Any breach of this policy may result in disciplinary action and possible termination of employment.