

<b>POLICY AND PROCEDURE TITLE</b>	<b>POPIA CLIENT / USER PRIVACY PROTOCOLS POLICY</b>
<b>POLICY AND PROCEDURE NUMBER</b>	2021/06/rev1
<b>IMPLEMENTATION DATE</b>	June 2021

## Document History

Rev No	Date	Section	Pages	Description	Approval
1	June 2021	All	All	Revision for implementation	PV

### 1. INTRODUCTION

The purpose of this policy is to advise the client / user (data subject) of JorDan Human Resources (Pty) Ltd. Services, both electronic and otherwise. Why data is being collected, processed and what data is in focus as well as how it will be processed. JorDan Human Resources is committed to being fully compliant with the POPI Act as far as the utilization and disclosure of data subject personal information (PI) is concerned. Technical and operational measures have been put in place to protect our data subject privacy and JorDan Human Resources invites all data subjects and / or requesters to engage with its Information Officer (IO) in perspective of any matter related hereto.

### 2. SCOPE OF APPLICATION

In the Promotion of Access to Information Act (PAIA) this policy applies to data subjects under the POPI Act in respect of requesters of records held by JorDan Human Resources. Personal Information (PI) applies to both, the natural and juristic persons. Our data subjects are invited to engage with JorDan Human Resources' Information Officer (IO) about any matters pertaining the POPI and PAIA, including but not limited to updating Personal Information (PI), deleting of PI. Complaints in respect of how PI is being processed and updating consent for electronic direct marketing. The Information Officer portal on the website facilitates these types of engagement.

### 3. PERSONAL INFORMATION (PI)

Personal information relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to:

- Information relating to race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person
- Information related to education or the medical, financial, criminal or employment history of the person



- Biometric information of a person, the personal opinions, views, or preferences of the person
- Any correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence
- Views or opinions of another individual about the person
- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

#### **4. PURPOSE OF COLLECTING AND PROCESSING PERSONAL INFORMATION (PI)**

JorDan Human Resources processes PI for various purposes including for:

- Engaging in various forms of recruitment
- Facilitation transactions with data subjects
- Complying with the provisions of statute and regulations
- Attending to the legitimate interest of data subjects
- Providing data subject information to JorDan Human Resources partners, to use data subject information to market their services to current clients and/or who have consented as envisaged in the POPI Act. JorDan Human Resources partners who are recipients of PI are business organisations who are permitted to use the information only for lawful sales, marketing, and engagement
- Confirm and verify data subject identity or to verify that they are authorised users for security purposes
- Conduct market or customer satisfaction research
- Audit and record keeping purposes
- In connection with legal proceedings

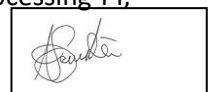
#### **5. LAWFUL BASIS**

In response of processing PI as mentioned above, JorDan Human Resources will adhere to the conditions for the lawful processing of PI, based on its desire to provide data subjects services in their best interest as well as a legitimate interest of JorDan Human Resources to achieve its business objectives.

#### **6. PERIOD OF HOLDING PERSONAL INFORMATION**

JorDan Human Resources endeavours to provide the most accurate information as possible to its stakeholders as well as data subjects. JorDan Human Resources seeks to verify the accuracy of its information as frequently and to remove information when it learns to be inaccurate.

JorDan Human Resources intend to process information that it has on data subjects for so long as it is accurate or until the data subject instructs JorDan Human Resources to refrain from process the information. To instruct JorDan Human Resources to refrain from collecting and/or processing PI, please contact our Information Officer.



JorDan Human Resources shall hold PI for such period as may be required in terms of the statutes such as the Companies Act and various labour laws.

## **7. DATA SUBJECT RIGHTS**

Data subjects have the right to request that JorDan Human Resources provide them with access to their PI, to rectify or correct their PI, delete PI, or restrict the processing of their PI. This includes refraining from sharing or providing it to any third party. Data subject also have the right to raise complaints with the Information Regulator. The afore-going rights may be subject to certain limitations pursuant to applicable law. To access any of these rights, contact our Information Officer.

## **8. SOURCES OF PERSONAL INFORMATION (PI)**

JorDan Human Resources gathers PI from several sources, which include directly from data subject, publicly available sources such as websites, social medial, LinkedIn, commercial transactions with JorDan Human Resources. Referrals, prospects, partner agreements, training engagements, conferences. Given that PI can be extracted and/or obtained from several sources and consolidated into one CRM or other similar systems of record, it may be difficult or impossible to identify the exact source of a particular piece of information.

## **9. CATEGROEIS OF PERSONAL INFORMATION (PI) COLLECTED AND PROCESSED**

JorDan Human Resources collects information of data subjects who may be clients, client contacts, prospective clients, and prospective client contacts, candidates, prospective candidates, and candidate contacts listed on our application form. Information is also collected on its employees and suppliers, as well as third parties that forms part of its scope of operations.

In respect of all of the above listed JorDan Human Resources may have some or all the following categories of PI on the data subjects, historical and/or current:

- Full Name and Surname
- ID Number
- Equity, Gender, Disability status
- Contact Details (email/mobile number), alternative contact details of a family member or friend
- Date of Birth
- Position held and responsibilities
- Area of interest in respect of vacancies on offer
- Record of services used
- Email correspondence and attachments
- Organisation details
- Address details
- Organisation contact details
- Organisation email address



- Organisation and data subject on social media and URL's
- Other information that is available on public domain

JorDan Human Resources collect and process personal information mainly to contact data subjects for the purpose of understanding their requirements and delivering services accordingly. Where possible, JorDan Human Resources will inform data subjects what information they are required to provide JorDan Human Resources and what information is optional, as well as the consequences of not providing the said information.

Website information that is being used may be collected using LinkedIn and other website information which allows JorDan Human Resources to collect standard contact information. Website usage information may also be collected using "cookies" which allows JorDan Human Resources to collect standard internet visitor usage information.

## **10. DISCLOSURE OF INFORMATION**

JorDan Human Resources may disclose data subject's personal information to its service providers who are involved in the delivery of products or services data subjects. JorDan Human Resources have agreements in place to ensure that it complies with the privacy requirements as required by the POPI Act.

JorDan Human Resources may also disclose data subject Personal Information:

- Where it has a duty or a right to disclose in terms of law and/or industry codes
- Where it believes it is necessary to protect its rights

## **11. INFORMATION SECURITY**

JorDan Human Resources is legally obliged to provide adequate systems, technical and operational protection for the PI that it holds and to prevent unauthorised access to as well as prohibited use of PI.

JorDan Human Resources will therefore on a regular basis review the security controls and related processes to ensure that the PI of the data subjects remains secure.

JorDan Human Resources conducted an impact assessment across all its functions and used the finds thereof to manage risk optimally as well as to provide iterative improvements on an ongoing basis.

JorDan Human Resources' policies and procedures covers the following aspects:

- Physical security
- Computer and network security
- Access to personal information
- Secure communications
- Security in contracting out activities or functions
- Retention and disposal of information



- Acceptable usage of personal information
- Governance and regulatory issues
- Monitoring access and usage of private information
- Investigating and reacting to security incidents

JorDan Human Resources also ensures that its contacts with Operators as required by POPI and it requires appropriate security, privacy, and confidentiality obligations of these operators to ensure that personal information (PI) is kept secure. The same protocols apply to any whom JorDan Human Resources may pass personal information on to for the purpose mentioned herein.

## 12. CONTACT OUR INFORMATION OFFICER

Information Officer: Anett Sevenster  
Email: [anetts@jordanhhr.co.za](mailto:anetts@jordanhhr.co.za)  
Mobile: 072 833 2365  
Head Office: Units 1-2 Oaklane Office Park, Grippen Road, Bartletts, Bartlett AH,  
Boksburg, 1459



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**Anett Sevenster**

**JorDan Human Resources - Information Officer**

