



HR PROCESSING NOTICE

REVISION NUMBER.

Version 1

DATE

17/06/2021

1. PURPOSE OF THIS NOTICE

Compass Visual Security (Pty) Ltd (collectively referred to as “we”, “us”, or “the company”) in our capacity as a Responsible Party, in order to engage with you, will have to process your 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.

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.

2. APPLICATION

This Processing Notice applies to the following persons:

- Applicants: persons who wish to apply for an employment position within Compass Visual Security (Pty) Ltd ;
- Employees: persons who are employed by Compass Visual Security (Pty) Ltd

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, education and employment history and qualifications, and or any performance or employee related history.	YES	NO
Employment- potential – legitimate purpose: To conduct and communicate with you regarding recruiting, potential employment and human resources administration.	YES	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.	YES	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.	YES	NO



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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.	YES	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 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.	YES	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, 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 SAP official, investigator or court official, regulator, or public authority and / or to manage and attend to insurance matters.	YES	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.	YES	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.	YES	NO
Occupational health - compliance with laws: To manage occupational health and absence and fitness for work and notifying family members in emergencies.	YES	NO
Travel - contractual: To facilitate business travel, travel-related support including conference attendance, bookings, and emergency support services.	YES	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.	YES	NO
For internal research and development purposes - Legitimate purpose: To conduct internal research and development.	YES	NO



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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.

YES

NO

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

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



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- 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.
- 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.
- 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.

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

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:

5.1.1. Direct collection: You provide Personal Information to us when you:

- interact with us;
- enquire about, or apply for a position
- express an interest in working 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.

5.1.2 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;
- open emails or click on links in emails or advertisements from us;
- Otherwise interact or communicate with us.

5.1.3 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;
- SAP, 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.



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6. HOW WE SHARE INFORMATION

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 COMPASS VISUAL SECURITY (PTY) LTD for employment, HR, business and operational purposes.
- Your Contacts and other employees. We may share your Personal Information with other COMPASS VISUAL SECURITY (PTY) LTD 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.
- 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.
- 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.
- 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.
- Potential sale transactors: We may provide relevant parts of your Personal Information to any potential acquirer of or investor in any part of COMPASS VISUAL SECURITY (PTY) LTD's business for the purpose of that acquisition or investment.
- 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.

7. SECURITY OF INFORMATION

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 organizational 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.



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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.

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 the COMPASS VISUAL SECURITY (PTY) LTD records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types.

8. YOUR RIGHTS

You as a Data Subject have certain rights,

- The right of access
- The right to rectification
- The right to erasure (the 'right to be forgotten')
- The right to object to and restrict further processing
- The right to withdraw consent
- The right to data portability

ACCEPTANCE AND BINDING NATURE OF THIS DOCUMENT

By providing Compass Visual Security (Pty) Ltd 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.

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