

MEASURED ABILITY GROUP HOLDINGS

CLIENT AND USER - DATA SUBJECTS PRIVACY POLICY

Incorporating:

Measured Ability Group Holdings (Pty) Ltd – Co. Reg. No: 2013/023268/07

MASA Outsourcing (Pty) Ltd – Co. Reg. No: 2017/455260/07

Greys MASA Measured Ability South Africa (Pty) Ltd – Co. Reg. No: 2008/016985/07

MASA Upliftment Trust – Co. Reg. No: IT000135/2019(N)

MASA Training Academy (Pty) Ltd – Co. Reg. No: 2018/331299/07

1. PREAMBLE

This Privacy Policy should be read and understood together with the PAIA Manual (The Promotion of Access to Information Act Manual) and our general terms and conditions of business for Clients, Suppliers, Employees, Assignees and Candidates seeking employment. It applies to all the companies within the Measured Ability Group namely, Measured Ability Group Holdings (Pty) Ltd, MASA Outsourcing (Pty) Ltd, Greys MASA Measured Ability South Africa (Pty) Ltd, MASA Upliftment Trust and MASA Training Academy (Pty) Ltd.

The purpose of this policy is to advise clients and data subjects of the Measured Ability Group of companies, why data is collected and processed by the companies within the group, what data is collected and how it is processed.

The Group is committed to full compliance with the POPI Act insofar as the utilisation and disclosure of data subject personal information (PI) is concerned. Hence, technical and operational measures have been put in place to protect data subject privacy and the Group invites all data subjects and/ or requesters of (PI) to engage with its Information Officer (IO) in respect of any matter related hereto.

This Privacy Policy:

- Outlines the Measured Ability Group's practices and commitment to complying with POPIA;
- Sets out the categories of personal information companies within the Measured Ability Group may collect from third parties or other sources;
- Outlines how the Measured Ability Group processes personal information; and
- Is fully binding on all stakeholders.

This privacy policy is an evolving document.

2. SCOPE OF APPLICATION

This policy applies to data subjects under the POPI Act and its principles extend to the Promotion of Access to Information Act (PAIA) in respect of requesters of records held by the Measured Ability Group of Companies. PI applies to both natural and juristic persons. Data subjects and requesters are invited to engage with the Group's Information Officer about any matter pertaining to the POPIA and PAIA, including but not limited to updating PI, deletion of PI, complaints in respect of how PI is being processed and updating consent for electronic direct marketing. The "Information Officer" details are contained herein below for these types of engagement.

3. ABOUT THE COMPANY

The Measured Ability Group comprises of a group of companies specialising in National and International employment and staffing. Each company within the group specializes in its respective area offering services in blue collar recruitment, labour broking, labour hire, labour outsourcing, temporary employment services, white collar temporary & permanent recruitment, nursing and cleaning staff as well as industrial relations, human resources and payroll services, skills development and training and international recruitment.

The Group is a member of both APSO (Association of Personnel Service Organisations) and CAPES (Confederation of Associations in the Private Employment Sector). It employs staff under numerous bargaining councils and has a strong Industrial Relations, Human Resources, Payroll and Recruitment team who are specialists in the industry. More details in this regard can be obtained from the Company website.

4. PURPOSE OF POPIA

POPIA was promulgated to regulate the constitutional right to privacy and aims to protect the free-flow of information and advance the right of access to information whilst giving effect to the right to privacy. The purpose of POPIA is to ensure that when a responsible party is in possession of "personal information", certain protective measures are taken to ensure that the information is protected.

POPIA describes personal information any information about an individual or entity that is in the possession of the Company.

5. PURPOSE OF PAIA

The general purpose of The Promotion of Access to Information Act, No. 2 of 2000 (PAIA) was enacted to give effect to the constitutional right of access to information is to promote transparency. It is intended to give effect to the access of information and to provide for different criteria and processes for when information is being sought from public bodies and/or private persons. Details regarding the access to information is available below.

6. DEFINITION OF PERSONAL INFORMATION (PI)

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

- a. information relating to the 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;
- b. information relating to the education or the medical, financial, criminal or employment history of the person;
- c. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d. the biometric information of the person; (e) the personal opinions, views or preferences of the person;
- e. 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;
- f. the views or opinions of another individual about the person; and
- g. 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;

7. PURPOSE OF COLLECTING AND PROCESSING PI

Companies within the Measured Ability Group process and use PI for various purposes including for:

- a. Performing its duties in pursuance of any agreement or contract
- b. Carrying out market research, business and statistical analysis
- c. Engaging in various forms of direct marketing
- d. Facilitating transactions with data subjects
- e. Collecting data for business intelligence purposes to improve its services by using cookies
- f. Fulfilling its contractual obligations to its clients and client contacts
- g. Providing recruitment services
- h. Streamlining the job application process by enabling candidates to submit their applications and CV's via its website
- i. To send out candidate information to clients in order to apply for employment or to assess eligibility for employment
- j. To disclose information to third parties in order to verify details provided by candidates, through reference checks, qualification checks, credit checks, criminal checks and psychometric or skills assessments
- k. Complying with the provisions of statute and regulations
- l. Attending to the legitimate interests of data subjects
- m. Identifying prospects for enhanced service delivery and business sustainability
- n. Making contact, if and when required, to promote its services or in relation to a customer care query
- o. Tracking data subject activity on the website and its links as well as their transactions with the Measured Ability Group
- p. Providing data subject information to the Group's partners in order for them to use the information to market their services to data subjects who are current clients and/ or who have consented as envisaged in the POPI Act. These Group partners who are recipients of PI are business organizations who are permitted to use the information only for lawful sales, marketing and engagement and with the permission of the data subject
- q. Confirming and verifying data subject identity or to verify that they are authorised users for security purposes

- r. Conducting market research
- s. Auditing and record keeping purposes
- t. In connection with legal proceedings
- u. Carrying out any other reasonable business operations

Information may also be used for other purposes for which permission is given, if required to by law, or if it is of public interest to disclose such information. The Measured Ability Group undertakes to only process information that is required and relevant for the purposes set out above.

The Company will not intentionally collect information about children and will only process information about children with the consent of a parent or guardian, or if otherwise required to do so by law.

The Company does not intend to process any “special personal information” as defined in POPIA, which includes for example political, religious or health-related information, and will only process special personal information with the stakeholders’ consent, or if otherwise allowed to do so in law if for a specific operational reason.

Stakeholders may on reasonable grounds object to the processing of information, after which the Group undertakes not to continue to process, except when required to do so by law.

8. LAWFUL BASIS

In respect of the processing of PI as provided for above, The Measured Ability Group will adhere to all conditions for the lawful processing of PI, based on its desire to provide its data subjects with services in their best interests as well as a legitimate interest of the Group to achieve its business objectives.

9. DATA SUBJECTS RIGHTS

Data subjects have the right to request that the Measured Ability Group provides them with access to their PI, to rectify or correct their personal information, erase PI or restrict the processing of PI, including refraining from sharing it or otherwise providing it to any third parties.

Data subjects 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. In order to access any of these rights, they may contact the Information Officer.

10. PERIOD OF HOLDING PERSONAL INFORMATION

All companies that fall under the Measured Ability Group endeavour to provide the most accurate information as possible to their stakeholders, including their data subjects. The Group seeks to verify the accuracy of its information as frequently as possible and to remove information that it learns to be inaccurate. Thus, the Group intends to process the information it has about data subjects for as long as it is legally specified or until the data subject gives any instruction to refrain from processing it.

In order to instruct any company within the Measured Ability Group to refrain from collecting and/ or processing their PI, data subjects may contact the Information Officer.

Notwithstanding the above, the Measured Ability Group shall hold PI for such period as may be required in terms of statutes such as the Companies Act and various labour laws.

11. CONSENT

The supply of PI to any company within the Group by any of its stakeholders is at the stakeholders’ discretion. By supplying their information, stakeholders are accepting the practices and terms contained in this privacy policy.

The Measured Ability Group will not process stakeholders’ PI without obtaining stakeholders’ consent.

In respect of all marketing activities relating to the Company's services and/or products, consent to collect or use PI will be obtained.

In respect of other activities, consent to collect or use will be obtained via acknowledgement by the stakeholder concerned, that a company within the Group is collecting his or her PI. This acknowledgment will be contained in all documents where PI is collected, including any agreements and/or contracts concluded between the relevant company and the stakeholder, where the stakeholder will be specifically requested to sign an acknowledgment of the collection of PI.

If PI is collected through a third party, the third party will be requested to sign a declaration that they comply with POPIA requirements.

The Measured Ability Group processes and shares stakeholder information internally and will only share PI relating to that stakeholder internally in instances where operationally required or where it is obliged to disclose certain categories of information relating to regulatory, statutory and legal purposes.

12. CATEGORIES OF PERSONAL INFORMATION COLLECTED AND PROCESSED

The Measured Ability Group collects information about data subjects who may be clients or prospective clients. It also collects information on its employees, assignees, candidates, consultants, agents and suppliers as well as third parties that are part of its scope of operations.

In respect of clients and prospective clients, the Measured Ability Group profiles business organizations and the contacts who work for said organisations and it may have some or all of the following categories of personal information on data subjects, historical or current:

- Name and Surname
- Identity Number
- Equity, Gender & Disability Status
- Contact Details (email, contact numbers)
- Birth date
- Position held and responsibilities
- Areas of interest in respect of any of the Measured Ability Group offerings
- Sales and transaction history
- Record of services used
- Email correspondence and attachments
- Organisation details
- Office address
- Office contact details
- Organisation email address
- Organisation and data subject Social media URL's
- Other information that is available in the public domain

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

Website usage information may be collected using "cookies" which allows the Measured Ability Group to collect standard internet visitor usage information.

13. COOKIES POLICY

A cookie is essentially a piece of code saved by a website onto the cookie file of the data subject's web browser (onto the specific device they are using) when a browsing session is initiated, so that the website can remember who they are and create a better experience for the data subject. They have many uses but the most important ones are session management, user personalisation and tracking.

Cookies are not programs; they do not perform any functions. These are simple text files that help a website to arrange content to match preferred interests quicker.

Cookies alone cannot be used to identify a data subject. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie and a value, usually a randomly generated unique number.

The Measured Ability Group's website uses two types of cookies:

1. **Session Cookies:** These are temporary cookies that remain in the cookie file of the data subject's browser until he/she leaves the site. They also allow the data subject to carry information across pages of the website and avoid having to re-enter information.
2. **Persistent Cookies:** These remain in the cookie file of the data subject's browser for longer (though how long depends on the lifetime of the specific cookie) and help to recognise the data subject as a unique visitor (using a number, he/she cannot be identified personally) when returning to the website. These cookies are also used to compile anonymous, aggregated statistics that allow the Group to understand how data subjects use the website in order to improve the structure of it. Data subjects cannot be identified personally in this way.

A data subject can delete any cookies that have been installed in the cookie folder of their browser. To do this using Microsoft Windows Explorer:

- Open 'Windows Explorer'
- Click on the 'Search' button on the tool bar
- Type "cookie" into the search box for 'Folders and Files'
- Select 'My Computer' in the 'Look In' box
- Click 'Search Now' * Double click on the folders that are found
- 'Select' any cookie file
- Hit the 'Delete' button on your keyboard

(If Microsoft Windows Explorer is not being used, then one can select "cookies" in the "Help" function or device manual for information on where to find their cookie folder.?)

Upon using the Groups website a data subject has a choice whether or not to allow cookies.

14. COLLECTING INFORMATION AND SOURCES OF INFORMATION

The type of information collected varies. Information includes any personal information as defined in POPIA, but is not limited to details such as company information, partner agreements, name, age, ID numbers, registration numbers, addresses and other contact details, previous employment history, educational information, salary information, liabilities, income and payment records, financial information and banking details such as account numbers and biometric details such as fingerprints.

Stakeholders' information in general refers to information submitted to the Measured Ability Group through:

- its website:
 - that identifies or relates to an online visitor or customer, whether they are an individual or a business or

- where job seekers may register via the portal to join the data base for prospective employment opportunities or to apply for specific jobs that have been advertised
- agreements and/or contracts concluded with the Company;
- third party sources where allowed to do so in law;
- emails
- social media
- registers
- employment
- other communications sources

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 one particular piece of information.

15. SHARING AND DISCLOSURE OF INFORMATION

The Measured Ability Group will only share information with third parties with a stakeholder's consent or if otherwise required to do so by law.

The Group may disclose data subject PI to its service providers who are involved in the delivery of products or services. In this case, the Group has trusted relationships with selected third parties who perform services on its behalf. All service providers are bound by contract to maintain the security of the Groups stakeholders' information, ensure that it complies with the privacy requirements as required by the POPI Act and to use it only as permitted.

Companies within the Measured Ability Group may also disclose data subject PI:

- Where they have a duty or a right to disclose in terms of law and/ or industry codes;
- Where they believe it is necessary to protect their rights.

16. INFORMATION SECURITY AND SAFEGUARDING

The Measured Ability Group understands the value of information and will take all reasonable steps to protect the information from loss, misuse, or unauthorised access.

As such, all Companies within the Group are legally obliged to and take responsibility for:

- Protecting and managing the PI that it holds about its stakeholders;
- Making use of electronic and computer safeguards, such as firewalls and data encryption, to secure stakeholders' information;
- Ensuring physical and electronic access control to its premises; and
- Only authorising access to information to those employees who require it to fulfil their designated responsibilities;
- Reviewing their security controls and related processes on a regular basis to ensure that the PI of data subjects remains secure.

The Group has conducted an impact assessment across all of its operations and used the findings thereof to manage risk optimally as well as to provide imperative improvements on an ongoing basis. Its policies and procedures cover 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.

Stakeholders can also help maintain the security of information by becoming familiar with POPIA and implementing their own security measures and procedures.

17. ACCESS TO INFORMATION – HOW TO CONTACT THE COMPANY

Stakeholders have the right to access information, including certain personal information held by the Measured Ability Group. Requests for information must be made to the Information Officer at our Head Office:

Name: Ayanda Khuzwayo
 Telephone number: +27 31 312 6453
 Postal address: PO Box 22240, Glenashley, 4022
 Physical address: 3rd Floor Island Circle, 22 Island Circle Drive, Riverhorse Valley Business Estate
 Riverhorse Valley, Durban, 4017, South Africa
 Email address: information.officer@masa.co.za

Access to information in terms of the PAIA must be obtained in accordance with the Access to Information Manual, which is available on Measured Ability Group website at www.measuredability.com

A stakeholder, having provided adequate proof of identity, has the right to:

- Request a responsible party to confirm whether or not the Measured Ability Group holds personal information about them; and
- Request from a responsible party the record or a description of the personal information about themselves held by a company within the group, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to their information.

A stakeholder may, in the prescribed manner, request the Measured Ability Group to:

- Correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- Destroy or delete a record of personal information about a data subject that the Measured Ability Group is no longer authorised to retain in terms of POPIA.