

Privacy Policy - South Africa

1 INTRODUCTION

1.1 We, BAIR Recruitment Group Proprietary Limited, a company incorporated in accordance with the laws of the Republic of South Africa, with registration number 2018/589741/07 , and registered address at 1st Floor, 1 Bompas Road, Dunkeld West, Johannesburg, Gauteng, 2196 ("BAIR", "we" or "us") are the "responsible party" for purposes of applicable data protection legislation in respect of all your Personal Information that you submit to us via the website: <https://www.bair.co.za> ("Website") and/or that may be collected by us through any correspondence and/or communication with you. Please note paragraph 9 below as it deals with Personal Information you submit to third parties.

1.2 Part of the services that we provide to our clients, is to survey the market and identify potentially suitable candidates for certain roles or employment opportunities, and pursuant to these services we collect Personal Information (as defined in paragraph 2.2 below) about such potential candidates. Should you be such a potential candidate and wish to apply for a vacancy or position at one of our clients, we will facilitate this process. This Privacy Policy sets out the basis on which any Personal Information that we collect about you, or that you provide to us, will be used, stored and processed by us.

1.3 You agree to your Personal Information being collected, used and disclosed in the manner set out in this Privacy Policy.

1.4 The primary purpose of the Website is to provide you with information regarding the services provided by the BAIR group of companies and consultants to its clients.

1.5 We recognise the importance of protecting your privacy in respect of Personal Information collected by us.

2 INFORMATION WE MAY COLLECT ABOUT YOU

2.1 When you visit the Website, we may collect certain information that is not Personal Information such as your Internet Protocol ("IP") address (see paragraph 7.1 below), operating system, browser type, and Internet service provider. This type of information does not identify you personally.

2.2 For purposes of this Privacy Policy, "Personal Information" shall mean any information of a personal nature by which you can be identified as an individual such as your name, postal address, email address, telephone number, home country, postal code, your fax number, gender, age, financial

details and/or company name. We may collect and process the following information (which may include Personal Information) about you:

2.2.1 information that you provide by filling in forms on the Website. This includes information provided at the time of registering to use the Website, subscribing to our services posting material or requesting further services;

2.2.2 if you proceed with a job application, additional information that you may be required to submit, such as your date of birth, your education and career history and a curriculum vitae or resume;

2.2.3 information relating to protected characteristics, such as your race or marital status, that we may ask you to provide to us from time to time;

2.2.4 information about you, found through any third party subscriptions, such as LinkedIn;

2.2.5 information provided by you if you contact us, or if we contact you, and we may keep a record of that correspondence;

2.2.6 any information about you in the public domain;

2.2.7 information about you received from outplacement providers;

2.2.8 information about you obtained from third parties by way of referrals from such third parties;

2.2.9 information collected through user satisfaction surveys that we may ask you to complete and that we use for research purposes, although you do not have to respond to them;

2.2.10 your name, email address, job title, company name and country of residence if you would like to receive one of our newsletters; and

2.2.11 details of your visits to our Website (including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise) and the resources that you access.

2.3 In certain countries, you may be able to set up a user account. You will be asked to register a username and password so that you can gain secure access to your account.

2.4 The supply of your Personal Information is voluntary, however you

acknowledge that we cannot make certain services available to you on the Website if you do not wish to supply such Personal Information.

2.5 By continuing to use the Website, or any service that we may provide to you, or by providing us with any of your Personal Information or any confirmation in relation to the services that we provide to our clients, you consent to the processing, collection, storage, and use of your Personal Information for purposes of any of the services that we offer our clients and for the purposes set out in this Privacy Policy, and you consent to our collection of any changes or updates to such Personal Information collected by us, that you may provide. If you do not agree to the Privacy Policy, please do not use the Website.

2.6 Where you provide us with Personal Information relating to a third party data subject (for example, details of a referee or potential contact), you warrant that you have obtained all necessary consents from such third party, including the third party's consent for you to share such Personal Information with us to process on your behalf.

3 HOW YOUR INFORMATION IS USED AND DISCLOSED

3.1 If you wish to apply for a job, we will need to collect basic information about you, including your Personal Information.

3.2 We use the Personal Information we collect about you for a number of purposes:

3.2.1 personalising the look and feel of the Website, to fit personal preferences which we have inferred from your usage of the site (see the and "Cookies" section for more information);

3.2.2 rendering of our services, in partnership with our clients, on whose behalf we are instructed to find a suitable candidate for a role. This means that if we obtain your information directly or indirectly we may pass your details on to the relevant client to proceed with the application and you understand and agree that this means you may receive further direct correspondence from them;

3.2.3 rendering of our services and processing job applications, in partnership with our clients, on whose behalf we are instructed to advertise job vacancies. This means that if you apply for a specific job from an advertisement we may pass your details on to the relevant client to proceed with the application and you understand and agree that this means you may receive further direct correspondence from them;

3.2.4 for equality monitoring purposes, to understand the diversity of our applicant pool (this information is anonymised and aggregated);

3.2.5 to add to and maintain our proprietary database of potential candidates; and

3.2.6 improving the services, we offer – for example you may be asked to complete one of our online surveys.

3.3 We will only use your Personal Information for the purposes set out above, in accordance with the specific role or position, or multiple roles or positions, as instructed by you and otherwise in accordance with this Privacy Policy, or where we are required or authorised by law to disclose your information to others, or have your permission to do so.

3.4 We will not use your Personal Information for any purpose (other than as stated above) without your express consent. We will not use or disclose your Personal Information to third parties without your consent, unless the use or disclosure is –

3.4.1 required in order to comply with applicable law, order of court or legal process served on BAIR; and/or

3.4.2 disclosure is necessary to protect and defend the rights or property of BAIR.

3.5 We work closely with trusted partners with whom we need to share Personal Information to help us run this Website and provide our executive search services. Our partners include:

3.5.1 Online psychometric assessment entities around the world; and

3.5.2 our clients, for whom we provide search services.

3.6 We will share information only as anticipated within this Privacy Policy and wherever appropriate, try to limit disclosure to information in aggregated form, to avoid or limit identifying you personally.

3.7 We may also provide information to third party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services and customer services.

3.8 Your information may be shared with organisations located in other

countries around the world. We only make arrangements to transfer data overseas where we are satisfied that adequate levels of protection are in place to protect any information held in that country or that the service provider acts at all times in compliance with applicable privacy laws. Where required under applicable laws we will take measures to ensure that Personal Information handled in other countries will receive at least the same level of protection as it is given in this Privacy Policy.

3.9 You understand that we may disclose or share Personal Information with third parties as outlined above to operate the Website and provide our search services. If you are concerned about these arrangements, you should not use the Website.

3.10 We will be entitled to disclose your Personal Information to those of our affiliates, agents, advisors, employees and/or third party service providers and suppliers who assist us to interact with you via our Website, mobile communications and/or email, and thus need to know your Personal Information in order to assist us to communicate with you properly and efficiently. We will ensure that all such employees and/or third party service providers having access to your Personal Information are bound by appropriate and legally binding confidentiality and non-use obligations in relation to your Personal Information.

3.11 On rare occasions, we may be required to disclose your Personal Information due to legal or regulatory requirements. In such instances, we reserve the right to disclose your Personal Information as required in order to comply with our legal obligations, including but not limited to complying with court orders, warrants, subpoenas, service of process requirements or discovery requests.

3.12 We may also disclose information about our users to law enforcement officers or others, in the good faith belief that such disclosure is reasonably necessary to enforce this Privacy Policy, respond to claims that any content violates the rights of third-parties; or protect the rights, property, or our personal safety or the personal safety of our users or the general public.

4 COMMUNICATIONS FROM US

4.1 Where you have indicated that you would like to receive newsletter(s) from us, we may send email alerts and bulletins to inform you about our services (and about jobs we think you may be interested in).

4.2 You can also unsubscribe from receiving electronic marketing messages by following the "unsubscribe" instructions included in our communication

(and you may change your preferences and cease receiving direct marketing from us through your account settings).

5 PROTECTION OF YOUR PERSONAL INFORMATION

5.1 We recognize that protecting your privacy is important to you. For this reason, we are committed to protecting the Personal Information you provide in a variety of ways.

5.2 We will:

5.2.1 treat your Personal Information as strictly confidential;

5.2.2 take appropriate technical and organisational measures to ensure that your Personal Information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;

5.2.3 promptly notify you if we become aware of any unauthorised use, disclosure or processing of your Personal Information;

5.2.4 provide you with reasonable evidence of our compliance with our obligations under this Privacy Policy on reasonable notice and request; and

5.2.5 upon your request, promptly return or destroy any and all of your Personal Information in our possession or control.

5.3 We will not retain your Personal Information longer than the period for which it was originally required, unless we are required by law to do so, or you consent to us retaining such information for a longer period. Where your information is no longer required, we will ensure it is disposed of in a secure manner and, where required by applicable law we will notify you when such information has been disposed of.

5.4 If you register with us, or with a local partner who provides a job application portal on our behalf, please do keep your details up to date and notify us of any changes to the Personal Information. You can do this by updating your user preferences through your account login or by contacting us using the details set out in paragraph 8.4 below.

6 STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

6.1 We will do our best to protect your Personal Information, and we will use technology that will help us to do this, however, the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your information transmitted to our Website. Any transmission of your information to our Website is entirely at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping that password confidential. Please do not share your password with anyone.

6.3 You hereby consent to the transfer, storage or hosting of your Personal Information on servers outside of South Africa. We will at all times ensure that appropriate security safeguards are in place to secure and protect such Personal Information.

7 COOKIES AND IP ADDRESSES

7.1 We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

7.2 We may use cookies to manage our users' sessions and to store preferences, tracking information, and language selection. Cookies may be used whether you register with us or not. "Cookies" are small text files transferred by a web server to your hard drive and thereafter stored on your computer. The types of information a Cookie collects include the date and time you visited the Website, your browsing history, your preferences, and your username.

7.3 In some instances, our third-party service providers may use Cookies on the Website. We cannot control or access Cookies used by third party service providers. This Privacy Policy covers only Cookies used by us, and not any Cookies used by third parties.

7.4 Cookies enable us to:

7.4.1 estimate our Website's audience size and usage pattern;

7.4.2 store information about your preferences, which allows us to customise the Website according to your individual interests;

7.4.3 speed up your searches; and

7.4.4 recognise you when you return to the Website.

7.5 You have the ability to either accept or decline the use of Cookies on your computer, whether you are registered with us or not. Typically, you can configure your browser to not accept Cookies. However, declining the use of Cookies may limit your access to certain features of the Website. For example, you may have difficulty logging in or using certain interactive features of the Website.

8 ACCESS RIGHTS

8.1 In some jurisdictions you may have the right to request copies of your Personal Information which is within our custody and control together with details about how we use that information. If you think any of the Personal Information we hold about you is inaccurate, you may also request us to correct it. You may also have a right, in certain circumstances, to require us to stop processing your Personal Information.

8.2 In relation to all of these rights, please email or write to us at the address set out in paragraph 8.4 below. Please note that we may, where permitted under applicable law, charge a small administrative fee and/or request proof of identity. We will respond to your requests within all applicable timeframes.

8.3 In certain circumstances (for example where required or permitted by law) we might not be able to provide you with access to some of your Personal Information, but where appropriate we will notify you of the reasons for this.

8.4 You may request access to the Personal Information that we collect about you by sending an email to us at andrewc@bair.co.za . You also have the right to lodge a complaint with the information regulator if you think we are in breach of any applicable data protection legislation.

9 THIRD PARTIES

9.1 This Privacy Policy applies to this Website. If you click on the links to Third-Party Websites, you leave the Website. We are not responsible for the content of these Third-Party Websites or for the security of your Personal Information when you use the Third Party Websites. These third-party service providers and Third-Party Websites may have their own privacy policies governing the storage and retention of your Personal Information that you may be subject to. They may also collect information that is not Personal Information such as

your IP address, browser specification, or operating system.

9.2 This Privacy Policy does not govern Personal Information provided to, stored on, or used by these third-party providers and Third-Party Websites. We recommend that when you enter a Third-Party Site, you review the Third Party Website's privacy policy as it relates to how such third parties collect, process, store and protect your Personal Information.

10 GENERAL

10.1 This Privacy Policy governs the ways in which we collect and use information about you.

10.2 You agree to provide accurate, truthful and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything. Failure to adhere to this requirement will entitle BAIR inter alia, to terminate your use of the Website and/or the services.

10.3 You may access, remove, review, and/or make changes to Personal Information that you have provided to us. If you register, we may send you certain notifications and advertisements. We may also send you any legally required notifications and certain notifications, including but not limited to, service related notices or notices regarding a change to any of our policies. For example, we may send you a notice regarding server problems or scheduled maintenance to the Website. In order to opt-out of receiving these notices, you may need to deactivate your account. You can opt out of certain email communications from us including our marketing and promotional communications by emailing us at info@bair.co.za.

10.4 If this Privacy Policy or any provision in this Privacy Policy is regulated by or subject to the Protection of Personal Information Act ("POPI") or other data protection legislation it is not intended that any provision of this Privacy Policy contravenes any provision of POPI or other data protection legislation. Therefore, all provisions of this Privacy Policy must be treated as being qualified, to the extent necessary, to ensure that the provisions of POPI or other data protection legislation are complied with.

11 NOTIFICATION OF CHANGES

We reserve the right to change this Privacy Policy from time to time, and in our sole discretion. We may send you a notice regarding material changes to this Privacy Policy, but we encourage you to frequently check this Privacy Policy for any changes. Your continued use of the Website and/or the services after any change in this Privacy Policy will constitute your acceptance of such changes.

12 HOW TO CONTACT US

If you have questions about this Privacy Policy, please contact us at andrewc@bair.co.za with "Privacy Policy" in the subject line.



B A I R

Recruitment Group