



## Protection Of Personal Information Act Privacy Notice

## 1. INTRODUCTION

- 1.1 Nomin8 Recruitment (“NOMIN8 RECRUITMENT”) is a leading South African Recruitment firm that provides recruitment services to the mining industry both locally (South Africa) and Internationally (Rest of Africa and Globally). NOMIN8 RECRUITMENT talent maps locate and recruit domestic and expatriate professionals for corporate and site operations. With an extensive track record of success and a passion for what they do in their mission to help organizations find the right people, with the right skills at the right time.
- 1.2 Each business unit is structured to serve specific customer needs and to meet specific regulatory requirements. As part of managing the business and creating value for its various clients and candidates, NOMIN8 RECRUITMENT is required to process personal information. Accordingly, NOMIN8 RECRUITMENT is required to protect the personal information as set out in the Protection of Personal Information Act 4 of 2013, including its Regulations (POPI Act).
- 1.3 This notice constitutes NOMIN8 RECRUITMENT’S policy statement to declare its commitment to comply with the POPI Act. Accordingly, it provides insights on how NOMIN8 RECRUITMENT processes personal information of data subjects as set out in the POPI Act.
- 1.4 NOMIN8 RECRUITMENT shall ensure that personal information is processed within the parameters of the law.
- 1.5 This notice must be read in conjunction with the POPI Act and its Regulations, where applicable.

## 2. OBJECTIVE

- 2.1 The objective of this notice is to give effect to the POPI Act and to provide clarity on the following:
  - 2.1.1 What personal information NOMIN8 RECRUITMENT collects about a data subject and the basis thereof;
  - 2.1.2 How NOMIN8 RECRUITMENT uses and protects the personal information of a data subject;
  - 2.1.3 How long NOMIN8 RECRUITMENT keeps the personal information of a data subject;
  - 2.1.4 The rights of a data subject regarding their personal information; and
  - 2.1.5 What the data subject should do if he/she does not want to provide NOMIN8 RECRUITMENT with his/her personal information.

## 3. PROCESSING OF PERSONAL INFORMATION

- 3.1 Personal information NOMIN8 RECRUITMENT collects about a data subject and the basis thereof:

The Personal information NOMIN8 RECRUITMENT collects in the ordinary course of business includes:

- a. Only information that is adequate, necessary, and relevant to enable it to effectively render a service or assist in any manner required, such as the Data subject’s name,

- curriculum vitae, identity number (where applicable), registration number, Data subject's employees or its director's personal information, contact information, etc;
- b. Electronic communications sent to NOMIN8 RECRUITMENT;
  - c. Information submitted to NOMIN8 RECRUITMENT in response to a vacancy advertisement;
  - d. Technical information, for instance through the use of cookies, such as - activity data, such as when the Data subject completes a form on NOMIN8 RECRUITMENT'S website, subscribes to a newsletter, alerts or other services from NOMIN8 RECRUITMENT;
  - e. Information from the Data subject's visits to the NOMIN8 RECRUITMENT'S website, including the type of browser and operating system that the Data subject uses, access times, pages viewed, URLs clicked on, his IP address, and the pages visited before and after navigating the NOMIN8 RECRUITMENT website;
  - f. Social media tracking pixels that allow platforms such as Facebook, Instagram, LinkedIn and Twitter to interact with the NOMIN8 RECRUITMENT website and give feedback on the Data subject's actions;
  - g. Device information, including the unique device identifier, hardware model, operating system, version and mobile network information;
  - h. Personal information that NOMIN8 RECRUITMENT collects when it monitors other websites may include the Data subject's public Personal information, for example when NOMIN8 RECRUITMENT monitors digital conversations on public platforms to understand what people are saying about it or the recruitment industry in general. NOMIN8 RECRUITMENT may combine information that it has about a Data subject from various sources; and
  - i. Personal information that NOMIN8 RECRUITMENT collects when a Data subject reports a possible side effect or adverse event associated with one of its products may include information such as gender, date of birth and information about the Data subject's designation and work history.
  - j. The NOMIN RECRUITMENT website uses various technologies including "cookies" which allow the website to recognize and respond to the Data subject as an individual. The Data subject can elect to accept or decline cookies. If a Data subject elects to decline cookies, not all elements of the website may function as intended, so their website experience may be affected.

### 3.2 Protecting the Data subject's Personal information:

- a. NOMIN8 RECRUITMENT uses a variety of security measures and technologies to help protect the Personal information of a Data subject from unauthorized access, use, disclosure, alteration, or destruction in line with applicable Personal information protection and privacy laws. For example, when NOMIN8 RECRUITMENT shares the Personal information of a Data subject with external clients, it shall put in place a written agreement which commits the suppliers to keep the Data subject's Personal information confidential and to put in place appropriate security measures to keep it secure.
- b. The transmission to NOMIN8 RECRUITMENT of information via the internet or a mobile phone network connection may not be completely secure and any transmission is at the Data subject's risk.
- c. Despite the security measures NOMIN8 RECRUITMENT has in place to protect Personal information of a Data subject (firewalls, password access, and encryption

methods), the Data subject acknowledges that it may be accessed by an unauthorized third party, e.g. as a result of illegal activity.

- d. From time to time NOMIN8 RECRUITMENT may provide links to websites or communicate via mobile applications that it does not own or control. This Notice does not apply to those websites. If a Data subject chooses to use those websites, he must check the legal and privacy policies or statements posted on each website or mobile application he accesses to understand their privacy practices.

**3.3 How does NOMIN8 RECRUITMENT use the Personal information of a Data subject:**

NOMIN8 RECRUITMENT may use the Personal information of a Data subject to provide the Data subject with information and services including:

- a. Online events, such as webcast events or virtual interviews
- b. Press releases;
- c. Job postings;
- d. Financial results;
- e. Marketing communication about NOMIN8 RECRUITMENT products and services. NOMIN8 RECRUITMENT will obtain consent for marketing to the extent required by law.
- f. Contact and interact with the Data subject, including:
  - i. Respond to requests from the Data subject (for instance in case the Data subject applied for employment); and
  - ii. Provide important notices and updates, such as changes to terms, standard operating procedures (SOPs), policies, security alerts, and administrative messages.
- g. Operate NOMIN8 RECRUITMENT's business, including:
  - i. Completing the attendance register for security purposes to ensure that only authorized persons enter the premises of NOMIN8 RECRUITMENT.
  - ii. Complying with applicable laws, regulations, and guidance; and
  - iii. Complying with demands or requests made by regulators, governments, courts, and law enforcement authorities.
- h. Improving NOMIN8 RECRUITMENT's day-to-day operations include:
  - i. For internal purposes such as auditing, data analysis, and research to help NOMIN8 RECRUITMENT deliver and improve its digital platforms, content, and services;
  - ii. To monitor and analyze trends, usage, and activities in connection with NOMIN8 RECRUITMENT products and services to understand which parts of NOMIN8 RECRUITMENT's digital platforms and services are of the most interest and to improve the design and content of those platforms;
  - iii. To improve NOMIN8 RECRUITMENT's products and services and communications to the Data subject; and
  - iv. To ensure that NOMIN8 RECRUITMENT has up-to-date contact information for the Data subject, where applicable.

**3.4 How long will NOMIN8 RECRUITMENT keep Personal information of a Data subject:**

NOMIN8 RECRUITMENT will always keep the Personal information of a Data subject for the period required by law and where it needs to do so in connection with legal action or an investigation in which it is involved. Otherwise, NOMIN8 RECRUITMENT will keep Personal information of a Data subject:

- a. For as long as needed to provide the Data subject with access to services he/she has requested;
- b. Where the Data subject has contacted NOMIN8 RECRUITMENT with a question or request, for as long as necessary to allow NOMIN8 RECRUITMENT to respond to the question or request and as required by law.

**3.5 Instances where sharing of Personal information of a Data subject by NOMIN8 RECRUITMENT is permitted:**

- a. NOMIN8 RECRUITMENT may share Personal information of a Data subject with the following third parties:
  - i. NOMIN8 RECRUITMENT's agents and clients, including those who provide it with technology services such as data analytics, hosting, and technical support;
  - ii. NOMIN8 RECRUITMENT's professional advisors, auditors, and business partners; regulators, governments, and law enforcement authorities; and
  - iii. Other third parties in connection with re-organizing all or any part of NOMIN8 RECRUITMENT's business.
- b. Personal information of a Data subject may be processed by NOMIN8 RECRUITMENT and NOMIN8 RECRUITMENT's third-party suppliers outside of the Data subject's home country. Personal information laws in the countries to which the personal information of a Data subject is transferred may not be equivalent to or as protective as, the laws in the Data subject's home country.
- c. NOMIN8 RECRUITMENT will implement appropriate and reasonable measures to ensure that the personal information of a Data subject remains protected and secure when it is transferred outside of the Data subject's home country, in accordance with applicable personal information protection and privacy laws. These measures include data transfer agreements implementing standard data protection clauses.

**3.6 The Data subject's rights regarding his Personal information:**

The Data subject is entitled to:

- a. Request NOMIN8 RECRUITMENT for access to Personal information NOMIN8 RECRUITMENT holds about him/her;
- b. Request the correction and/or deletion of his personal information;
- c. Request the restriction of the processing of his personal information, or object to that processing;
- d. Withdraw his consent to the processing of his personal information (where NOMIN8 RECRUITMENT is processing his personal information based on his consent);
- e. Withdraw his consent to receive marketing messages;
- f. Complain to his local data protection authority if his privacy rights are violated, or if he has suffered as a result of unlawful processing of his Personal information.

**3.7 What the Data subject should do if he/she does not want to provide NOMIN8 RECRUITMENT with his Personal information:**

- 3.7.1 Where a Data subject is given the option to share his Personal information with NOMIN8 RECRUITMENT, he/she can always elect not to do so.
- 3.7.2 If a Data subject objects to the processing of his personal information, or if he has provided his consent to processing and he later chooses to withdraw it, NOMIN8 RECRUITMENT will comply with the request in accordance with its legal

obligations. NOMIN8 RECRUITMENT'S legal obligations in respect of the withdrawn information shall therefore cease to exist.

#### **4. IMPORTANT NOTICE TO DATA SUBJECTS**

4.1 By visiting NOMIN8 RECRUITMENT'S website and communicating electronically with NOMIN8 RECRUITMENT, the Data subject consents to the processing, including transfer of his/her personal information as set out in this Notice.

4.2 NOMIN8 RECRUITMENT is continually improving its methods of communication and adding new functionality and features to its website. Due to these ongoing changes, changes in the law and the changing nature of technology, NOMIN8 RECRUITMENT'S data protection practices will change from time to time. If and when its protection practices change, NOMIN8 RECRUITMENT will update this Notice to describe its new practices. The Data subject is encouraged to check it regularly.

#### **5. CONTACT US**

5.1 For any questions or requests regarding this Notice or if a Data Subject would like to exercise his/her rights including contacting the Information officer, please use the following contact information:

Contact +27 32 586 0819 or Email [info@nomin8.co.za](mailto:info@nomin8.co.za)