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#### Amendment History

Issue	Date	Amendment Details	Requested By
01	21/06/2021	New Document	Jeandie Leonie

## **1. INTRODUCTION**

- 1.1 Workforce Holdings Ltd (hereinafter referred to as “Workforce”, “the Group”, “we”, “our”, “us”) understand the importance of protecting the personal information of our employees, trainees, clients, customers, business partners, suppliers and visitors and users (“users”/ “you”/ “your”) of the Workforce website at [www.workforce.co.za](http://www.workforce.co.za), social media sites and mobile applications (“Sites”).
- 1.2 This Privacy Policy represents our commitment to compliance with all relevant data protection legislation and has been published to help you understand our privacy practices.
- 1.3 This Privacy Policy describes what personal information we collect from you and how we process it in line with applicable data protection legislation, including the Protection of Personal Information Act (“POPIA”).
- 1.4 Please read this Privacy Policy carefully to understand your rights. If you have any questions, please contact us by submitting a request through the “Contact Us” form on our website or by contacting our information officer at [popia@workforce.co.za](mailto:popia@workforce.co.za).

## **2. WHO ARE WE?**

- 2.1. Workforce Holdings Limited is a leading, trusted provider of Employment, Training, Healthcare, Wellness and Financial and Lifestyle services to individuals and their employers.
- 2.2. Our Head Office is based at 11 Wellington Road, Parktown, Johannesburg, 2193.
- 2.3. We will refer to the business and offerings of Workforce as “products and services” for the purpose of this Privacy Policy.
- 2.4. Our business is conducted in South Africa, Botswana, Mozambique, Mauritius and other overseas territories.

## **3. APPLICATION OF THIS PRIVACY POLICY**

- 3.1. This Privacy Policy applies to personal information that we collect from you or third parties during your interactions with us online, including through our Sites and personal information that we may collect offline whether face to face or telephonically, in writing or verbally, and/or personal information we may receive from third parties about you as explained below.
- 3.2. By sharing your personal information details with us and/ or visiting or using the Sites you accept the application of this Privacy Policy and consent to the processing of your personal information in the way described herein.
- 3.3. We review our privacy policies regularly and occasionally may need to change or update them. The most current version of this Privacy Policy will always be posted under the Privacy Policy tab of the Site and will be effective from the date of posting.

- 3.4. You agree that you will check the Privacy Policy from time to time. By continuing to engage with us, purchase or use our products and services and/or continuing to access and/or use the Sites after we make changes to this Privacy Policy, you agree to be bound by the revised Privacy Policy.

#### **4. WHAT IS PERSONAL INFORMATION?**

- 4.1. Personal information is defined in the Protection of Personal Information Act (“POPIA”) as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, and includes any information that identifies or relates specifically to you, including, for example, your name, age and identity number or other national identifier, your contact address, your location, your banking details, and contact numbers. In short, any information that we can use to specifically identify you will be personal information.
- 4.2. Some types of personal information are considered special personal information. These include personal information revealing or related to a person’s health, racial or ethnic origin, religious or philosophical beliefs, sex life, political affiliation, or trade union membership; criminal behaviour and proceedings related thereto. We apply additional safeguards to the privacy of special personal information as required by the relevant data protection legislation.

#### **5. WHAT IS PROCESSING?**

- 5.1. Processing is defined in POPIA as any operation or activity or set of operations involving personal information, whether or not by automatic means, including collecting, receiving, recording, organising, collating, storing, updating, modifying, retrieving, altering, consulting or using; disseminating by means of transmission, distribution or making available in any other form; or merging, linking, as well as restriction, degradation, erasure or destruction of personal information. In short anything that is done with personal information from collection to destruction is processing.

#### **6. PERSONAL INFORMATION WE COLLECT FROM YOU**

- 6.1. Employees/prospective employees
- Basic information: name, surname, ID number (or where applicable passport number), income tax number, telephone number, email address, marital status, parental status, nationality, language, date of birth, drivers’ licenses, work permits, temporary residence permit, asylum status, signature, and copies of any documents ancillary to the information.

- Special Personal Information: race, gender, trade union membership, health declaration (including disability, physical and mental health), biometric information, criminal history (including current and past criminal records and information relating to proceedings or the disposal of such proceedings), religion (at your discretion), culture and any documents ancillary to the information.
- Credit information: information relating to your credit history, historical payment patterns, credit score and credit activities, including any current/past civil judgments against you and copies of any documents ancillary to the information.
- Employment history: information relating to your past (or in the case of prospective employees current) employers, earnings, payslips, contract of employment, and references.
- Education information: information relating to your secondary education history, learnerships, internships, tertiary and postgraduate education history, professional affiliations/ memberships, membership number relating to professional affiliations/memberships and copies of any documentation or licenses ancillary to such information.
- Location information: information relating to your location and travel arising from the use/possession of Workforce property, i.e. by means of Workforce vehicle tracking systems or any other technology/device owned/rented or operated by Workforce.
- Your personal views/opinions/preferences expressed during interviews, or disclosed voluntarily for purposes of internal communications, campaigns, and publications.
- Online identifiers/ symbols such as social media profiles and other online activities.
- Views/opinions of others about you expressed during interviews, performance assessments, or considerations for promotions or transfers within the group of companies.
- Medical information to the extent necessary to comply with relevant legislation and/or the inherent requirements of the job.
- Financial information: banking details and documentation in proof thereof.
- Photos of you for purposes of internal communications and publications.
- Where you are an employee who support Workforce as a public relations representative: your current professional and employment credentials, photos of you, recordings of you (voice or visual) in the context of your public relations activities.

## 6.2. Clients

- Trade name, registration number, registered address, VAT number, addresses and telephonic/facsimile/email contact details of all operating branches.
- Trade name, registration number, registered address, VAT number, addresses and telephonic/facsimile/email contact details of a supplier's holding company, subsidiaries and operating divisions.
- Name, designation, telephonic/facsimile/email contact details, signature of appointed key personnel.
- Name, designation, telephonic/facsimile/email contact details, signature of authorised representative(s) for purposes of completing documentation and entering into Service Level Agreements.
- Company letterhead and/or logo.
- Proof of banking details in the form of a cancelled cheque, bank letter or bank statement.
- BEE status and certificate.
- Information relating to turnover and debt patterns.
- Credit information obtained by means of credit checks and application forms.
- Personal information of directors (full names, ID number (or where applicable passport number), address, copy of ID and other business interests held).
- Recorded judgments against the client, its owner(s) and/or director(s).
- Correspondence received which is implicitly or explicitly of a private or confidential nature.

## 6.3. Students, learners, interns/ prospective students, learners, interns.

- Basic information: name, surname, ID number (or where applicable passport number), income tax number, telephone number, email address, marital status, parental status, nationality, language, date of birth, drivers' licenses, work permits, temporary residence permit, asylum status, signature, and copies of any documents ancillary to the information.
- Special Personal Information: race, gender, health declaration (including disability, physical and mental health), biometric information, criminal history (including current and past criminal records and information relating to proceedings or the disposal of such proceedings), and any documents ancillary to the information.
- Education information: information relating to your secondary education history, learnerships, internships, tertiary and postgraduate education history, professional affiliations/ memberships, membership number relating to professional affiliations/memberships and copies of any documentation or licenses ancillary to such information.

- Your personal views/opinions/preferences expressed during contact sessions, assignments, examinations, online student platforms and faculty engagements.
- Medical information to the extent necessary to make accommodations or adaptations for special needs or disabilities.
- Employment information: employment status at the time of application, occupation, employer, manager/supervisor, contact details of your employer and manager/supervisor.
- Photos of you, recordings of you (voice or visual) in the context of your participation in educational sessions/activities.

#### 6.4. Suppliers and third parties

- Trade name, registration number, registered address, VAT number, addresses and telephonic/facsimile/email contact details.
- Trade name, registration number, registered address, VAT number, addresses and telephonic/facsimile/email contact details of a supplier's holding company, subsidiaries and operating divisions.
- Name, telephonic/facsimile/email contact details, signature of appointed key personnel.
- Name, designation, telephonic/facsimile/email contact details, signature of authorised representative(s) for purposes of completing documentation and entering into Service Level Agreements.
- Company letterhead and/or logo.
- Proof of banking details in the form of a cancelled cheque, bank letter or bank statement.
- BEE status and certificate.
- Personal information of directors (full names, ID number (or where applicable passport number), address, copy of ID and other business interests held).
- Recorded judgments against the client, its owner(s) and/or director(s).
- Information relating to your secondary education history, learnerships, internships, tertiary and postgraduate education history, professional affiliations/memberships, membership number relating to professional affiliations/memberships and copies of any documentation or licenses ancillary to such information.
- Correspondence received which is implicitly or explicitly of a private or confidential nature.

- 6.5. We may also collect other information that does not personally identify you. This includes browser and device information, website and application usage data, IP addresses, demographic information such as marketing preferences, geographic location, home language, and information collected through cookies and other technologies or information that has been anonymized or aggregated. If we link this information with your personal information, we will treat such linked information as personal information.
- 6.6. You can choose not to provide personal information to us when requested. However, if this is necessary to provide you with our solutions, products and/or services, access to our Sites, or to perform administrative functions, we may be unable to do these things.

## **7. HOW WE COLLECT PERSONAL INFORMATION**

7.1. Personal Information you give us directly.

7.1.1. Generally, Workforce collects personal information from you in the following ways:

- Information given by you when you access our Site or interact with us in any other way or channel to enquire about or use our products and services.
- In the course of employment or training.
- Upon submission of an application form or other forms relating to any of Workforce's products or services.
- When you place orders for our products and services.
- When there is a response to Workforce promotions, initiatives or to any request for additional Personal Information.
- When contacted by or responding to Workforce marketing representatives and customer service officers.
- When Workforce receives references from business partners and third parties which you have agreed to.
- When we process payment transactions and/ or orders.
- When we perform administrative and business functions.
- When you register for our events, workshops and seminars or subscribe to our mailing lists and newsletters.
- When you complete a survey, enter a competition.
- When you communicate with us.
- When we respond to your enquiries and requests, obtain feedback from you about our solutions, products and services.
- When you contact us for information, products or services with our customers, vendors and other business contacts.



- When you send information to us by posting to a forum or blog or in an advertisement, it is stored on our servers. We do not specifically use that information except to allow it to be read, but we reserve a right to use it in any way we decide.
  - When Workforce seeks information from third parties in connection with employment, training the products and/ or services applied for; and
  - Upon submitting personal information to Workforce for any other reason.
  - If you contact us, including for customer support or complaints we want to provide you with the best possible service, so calls to Workforce may be recorded and/or monitored for quality checks and staff training. Recordings may also be used to help us combat fraud.
- 7.2. Personal Information we collect automatically.
- 7.2.1. We receive and store certain types of personal information whenever you interact with us online. For example, we use cookies and tracking technologies to obtain personal information when your web browser accesses our Sites or advertisements and other content served by or on our on other websites.
- 7.2.2. We track the products and services you enquire about or contract for when you click on one of our display adverts and go on to contract with us for products and/ or services.
- 7.2.3. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.
- 7.2.4. When you send a message, we collect the data you have given to us in that message in order to obtain confirmation that you are entitled to receive the information and to provide to you the information you need. We record your request and our reply in order to increase the efficiency of our business.
- 7.3. Personal Information we collect from other sources.
- 7.3.1. We collect personal information from third parties, including public databases, social media sites, business partners with whom we offer co-branded services or engage in joint marketing activities.
- 7.3.2. We collect information about you and your activities from a third-party when we jointly offer services or products, or from third-party data analytics and enrichment providers who may deliver insights to us about the Personal Information we hold.
- 7.3.3. We collect information from payment processors, marketing service providers, third party business partners and relevant governmental departments.
- 7.3.4. In circumstances where you have consented thereto, we collect information from previous employers, credit references, Credit Bureaus and other credit verification agencies.



## **8. LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION.**

- 8.1 When we process your personal information in connection with the purposes set out in this Privacy Policy, we may rely on one or more of the following legal bases, depending on the purpose for which the processing activity is undertaken and the nature of our relationship with you:
- 8.1.1. Our legitimate interests (or those of a third party with whom we share your personal information) for the purpose of managing, operating or promoting our business, including direct marketing, and transfers within Workforce of personal information for business and administrative purposes.
  - 8.1.2. To protect the vital interests of any individual.
  - 8.1.3. Where you have consented for such processing to take place.
  - 8.1.4. Where we are required by law to do so.

## **9. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION.**

- 9.1 We may process and disclose your personal information for the following purposes:
- 9.1.1. To provide you with the products and services which you request.
  - 9.1.2. To verify your identity for security purposes.
  - 9.1.3. To respond to your requests and enquiries.
  - 9.1.4. To detect and investigate disputes, billing, suspected illegal activities or fraud and manage commercial risks of Workforce and its customers and/ or third parties with whom it contracts.
  - 9.1.5. To perform a contract or for contract negotiations with or about you.
  - 9.1.6. To manage the administrative and business operations of Workforce and comply with internal policies and procedures of Workforce.
  - 9.1.7. To monitor or record phone calls and customer facing interactions for quality assurance, employee training, performance evaluation and identity verification.
  - 9.1.8. For legal purposes (including obtaining legal advice and dispute resolution).
  - 9.1.9. To meet or comply with any applicable laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on Workforce.
  - 9.1.10. In other ways naturally associated with the circumstances in which you provided the information. For example, we may use your e-mail address to send you a confirmation notice.
  - 9.1.11. To communicate information to you and to manage your registration on our Site and/or subscription to our newsletter or other communications.
  - 9.1.12. To authenticate the identity of individuals contacting us by telephone, electronic means or otherwise.

- 9.1.13. To enforce this Privacy Policy and other rules about your use of our Site, products or services.
- 9.1.14. To protect someone's health, safety or welfare.
- 9.1.15. To protect our rights or property.
- 9.1.16. To comply with a law or regulation, court order or other legal process.
- 9.1.17. To record your opt-in or opt-out preferences.
- 9.1.18. For our other legitimate interests unless such processing will unfairly prejudice your rights or freedoms.
- 9.1.19. In other ways which you consent to.
- 9.2 In addition, Workforce uses and discloses personal information where you are a client, employee, learner, trainee or trainee of a client or Workforce for:
  - 9.2.1. Opening or continuation of accounts and establishing or providing users with the products and services contracted for.
  - 9.2.2. Facilitating the continuation or termination of Workforce products and services.
  - 9.2.3. Facilitating the daily operation of the products and services (including but not limited to billing, customer service, customer verification, technical support, network maintenance and troubleshooting).
  - 9.2.4. Facilitating third party services if purchased, obtained, administered or processed through Workforce.
  - 9.2.5. To process your payroll payments, and/ or payroll deductions where relevant.
  - 9.2.6. To process payments where you purchase products or services.
  - 9.2.7. To provide you with your order status and assess and handle any complaints.
  - 9.2.8. To facilitate delivery of products and services.
  - 9.2.9. Managing and executing service level agreements with service providers and customers.
  - 9.2.10. Processing of payment instructions, direct debit facilities and/or credit facilities requested by customers, employees or service providers.
  - 9.2.11. Enforcement of payment and/ or repayment obligations (including but not limited to debt collection, filing of claims and retrieval of payments from losses made by service partners).
  - 9.2.12. Administering and processing any insurance claims and payments, where applicable.
  - 9.2.13. Credit and internal risk management (including but not limited to performing credit checks and disclosures to law enforcement agencies).
  - 9.2.14. Generation of internal reports (including but not limited to annual, operational and management reports).
  - 9.2.15. Processing referral payments and commission fees to Workforce's external partners.
  - 9.2.16. Administering fee adjustments, refunds and waivers.

- 9.2.17. Notifying users of their entitlements under loyalty and reward programmes with Workforce.
- 9.2.18. Internal communications and newsletters, reports, marketing material and public relations campaigns.
- 9.2.19. For purposes which are reasonably related to the aforementioned.
- 9.3 Furthermore, Workforce may also collect, use and disclose your personal information for the following additional purposes:
  - 9.3.1. For analytics and tracking, including facilitating the sale of analytical data.
  - 9.3.2. To conduct market research and surveys to enable Workforce to understand and determine customer location, preferences, and demographics in order to develop special offers and marketing programmes in relation to Workforce products and services, and to improve our service delivery and customer/ employee / trainee experience.
  - 9.3.3. To provide additional products, services, and benefits to you, which include promotions, loyalty and reward programmes from Workforce.
  - 9.3.4. To match personal information with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services by Workforce.
  - 9.3.5. For lead generation and management of marketing Workforce products and services.
  - 9.3.6. To administer contests, competitions, and marketing campaigns, and personalize user experience.
  - 9.3.7. To communicate advertisements involving details of Workforce products and services, special offers and rewards, either to general customers, or to communicate advertisements which Workforce has identified as being of interest to specific users (this includes but is not limited to upselling, cross selling, and telemarketing).
  - 9.3.8. To organise promotional events and corporate social responsibility projects.
  - 9.3.9. For purposes which are reasonably related to the aforementioned.
- 9.4 In relation to particular products and services or user interactions, Workforce may also specifically notify you of other purposes for which personal information is collected, used, or disclosed.

## **10. WHO WILL YOUR PERSONAL INFORMATION BE SHARED WITH?**

- 10.1 Workforce will not share your personal information with an unrelated third party without your permission, except to fulfil the purposes of processing referred to above or as otherwise provided in this Privacy Policy.
- 10.2 Accordingly, we may share your personal information for the purposes set out in this Privacy Policy:

- 10.2.1. With our members of the Workforce Holdings Limited Group of Companies.
- 10.2.2. With business partners with whom we offer co-branded services or engage in joint marketing activities.
- 10.2.3. With business partners on whose behalf, we are appointed to sell products and services.
- 10.2.4. With service providers to provide operational services or facilitate transactions on our behalf, including but not limited to processing of orders, assisting with sales-related activities or post-sales support, client support, email delivery, data analytics and auditing.
- 10.2.5. Where you consent to the sharing of your personal information.
- 10.2.6. In connection with any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company.
- 10.2.7. With payment processors and banking platforms who process the payment through our online store and / or facilitate the payment process.
- 10.2.8. With relevant insurers, where required.
- 10.2.9. With credit bureaus, fraud prevention or business scoring agencies, or other credit scoring agencies.
- 10.2.10. With debt collection agencies or other debt recovery organisations.
- 10.2.11. In response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process.
- 10.2.12. To relevant regulators or law enforcement agencies or other third parties as required by law.
- 10.2.13. To any person who is required to have access for the purposes referred to above.
- 10.2.14. To any person other than as described herein if we notify you and you consent to the sharing.
- 10.2.15. In the ordinary course of business, we will share some personal information with companies that we hire to perform services or functions on our behalf. For example, we may use different service providers or suppliers. In these cases, we provide the service provider or supplier with your information.
- 10.2.16. In all cases in which we share your personal information with a third party, we will not authorise them to keep, disclose or use your information with others except for the purpose of providing the services we asked them to provide and in terms of our Privacy Policy.
- 10.2.17. Such recipients will only have access to your personal information as required by them to perform their functions and are not permitted to use such personal information for any other purposes. These recipients will be subject to contractual confidentiality obligations.

- 10.2.18. Any third parties with whom we share personal information are contractually required to implement appropriate data protection and security measures to protect personal information and are not permitted to use personal information for any purpose other than the purpose for which they are provided with or given access to personal information.
- 10.2.19. We may share your personal information to relevant parties in conjunction with a corporate sale, merger, dissolution, or acquisition.

## **11. PROCESSING OF PERSONAL INFORMATION**

- 11.1 By providing personal information to Workforce, you acknowledge that the information has been collected from you directly and there is consent for Workforce to process such information.
- 11.2 Workforce will apply the following principles in the processing of such information:
- 11.2.1. Workforce will only collect personal information for a purpose consistent with the purpose for which it is required and in terms of this Privacy policy. The specific purpose for which information is collected will be apparent from the context in which it is requested.
- 11.2.2. Workforce will only process personal information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed as read with this Privacy Policy.

## **12. PROCESSING OF SPECIAL PERSONAL INFORMATION**

- 12.1 To the extent that Workforce may collect and process special personal information, it will only do so:
- 12.1.1. In ways for which you have given express consent.
- 12.1.2. To protect your legitimate interests.
- 12.1.3. As required by the relevant law.
- 12.1.4. Where the information has been made public by you deliberately.
- 12.2 For example:
- 12.2.1. we may collect special personal information about you from our customers, service providers, or other business contacts when we provide healthcare services or employee benefit services.
- 12.2.2. We may collect special personal information about persons when we receive questions and suggestions about our products and services.
- 12.2.3. We may collect special personal information as required by certain governmental authorities in order to assure safe and effective use of our products and services.
- 12.2.4. We may collect special personal information directly from you when you voluntarily provide it to us.

### **13. SECURITY OF YOUR PERSONAL INFORMATION**

- 13.1 Workforce is committed to protecting your personal information and in all circumstances the information is held by us on our secure systems. We take all reasonable and appropriate technical and organisational steps to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, misuse, unauthorised disclosure, loss, interference, destruction or damage, alteration, disclosure or access.
- 13.2 Our security systems are in line with industry standards and we monitor developments to ensure that our security systems evolve, as required. We also test our systems regularly.
- 13.3 We also contractually require that third parties to whom we disclose your personal information have appropriate security systems and protocols in place.
- 13.4 Personal information is destroyed or anonymised when no longer needed or when we are no longer required by law to retain it (whichever is the later).
- 13.5 We will promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information.
- 13.6 We may store your personal information with the web-hosting service provider appointed by us from time to time. The storage may be in South Africa or in another country.
- 13.7 Where storage is in another country, your personal information will be stored in a jurisdiction that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to observe data protection requirements equivalent to or better than those applicable in South Africa.
- 13.8 Notwithstanding the above, no data transmission over the Internet or data storage system can be guaranteed to be completely secure. Please do not send us sensitive information through email. If you have reason to believe that your interaction with us is not secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us at [popia@workforce.co.za](mailto:popia@workforce.co.za), or (011) 532 0000.

### **14. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?**

- 14.1 We will retain your personal information for as long as is necessary to fulfil the purpose for which it was collected unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. The criteria we use to determine retention periods include whether:
- 14.1.1. We are under a legal, contractual or other obligation to retain personal information, or as part of an investigation or for litigation purposes.
- 14.1.2. Personal information is needed to maintain accurate business and financial records.



- 14.1.3. A request from you to access and delete your personal information.
- 14.1.4. You have consented to us retaining your personal information for a longer retention period, in which case, we will retain personal information in line with your consent.
- 14.1.5. We will continue to treat your personal information in accordance with this Privacy Notice so long as we retain it.

## **15. CROSS BORDER TRANSFERS OF PERSONAL INFORMATION**

- 15.1 Workforce may transfer personal information out of the country in which it was collected to another country or territory.
- 15.2 We will transfer information to other areas only if:
  - 15.1.1. the transfer is necessary for the performance of a contract between you and Workforce or for pre-contractual measures taken in response to your request; or
  - 15.1.2. if you consent to the transfer; and
  - 15.1.3. if the data will be adequately protected in the other country, by contract or law.

## **16. LINKS TO THIRD PARTY WEBSITES AND APPLICATIONS**

- 16.1 Our Site may contain links to third party websites and applications. We are not responsible for and make no representations or warranties in relation to the privacy practices or content of any third-party websites and applications. Your use of such sites and applications is subject to the applicable third-party privacy notice and is at your own risk.

## **17. DIRECT MARKETING**

- 17.1. We may send you direct marketing communications about our products and services.
- 17.2. You can choose whether you wish to receive marketing communications from Workforce by email, SMS, and / or telephone call.
- 17.3. You may opt out of receiving marketing materials from us at any time and manage your communication preferences by:
  - 17.3.1. Following the unsubscribe instructions included in each marketing email or SMS text message from us.
  - 17.3.2. Sending an email to the sender of the marketing communications; or
  - 17.3.3. Writing to our contact address listed below.
- 17.4. You will need to include your details and a description of the marketing material you no longer wish to receive from us. We will comply with your request as soon as is reasonably practicable. Therefore, users may continue to receive marketing or promotional materials/communication during the period of time during which we are updating our records.



- 17.5. If you opt out of receiving marketing related communications from us, we may still send you administrative messages as part of your ongoing use of our products, solutions and services, which you will be unable to opt out of.

## **18. WHAT ARE YOUR RIGHTS?**

- 18.1. Under applicable data protection laws, you have the following rights:
- 18.1.1. Right to access and obtain a copy of your personal information: You are entitled to request confirmation whether we process any of your personal information. Where this is the case, you may have access to your personal information and to certain information about how it is processed. In some cases, you can ask us to provide you with an electronic copy of your information.
- 18.1.2. To correct your personal information: If you can demonstrate that the personal information, we hold about you is not correct, you can ask that this information is updated or otherwise corrected.
- 18.1.3. To have data deleted: In certain circumstances you have the right to have your personal data deleted. You may make such a request at any time and Workforce will evaluate if your request should be granted, however this right is subject to any legal rights or obligations we may have to retain data. For situations where in accordance with the law, we determine that your request to have your personal information deleted must be granted, Workforce will do so without undue delay.
- 18.1.4. To restrict or object to the processing of your data: In certain circumstances you have the right to obtain restriction of the processing of your personal information, or to object on certain processing thereof on grounds relating to your particular situation.
- 18.2. If you are a party to an agreement with us, we may not be able to continue that agreement if you withdraw our rights to process your personal information for purposes thereof. Accordingly, such withdrawal of consent may require and/ or entitle us to terminate the relevant agreement without further cause or damages.
- 18.3. You also have the right to lodge a complaint with a Regulatory Authority. You have the right to lodge a complaint directly with any local Regulatory Authority about how we process your Personal Information.

## **19. DISCLAIMER AND INDEMNITY**

- 19.1. Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence or non-compliance with applicable laws.

19.2. If you disclose your personal information to a third party, such as an entity which operates a website or mobile application linked to the Site or anyone other than Workforce, Workforce SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD PARTY. This is because we do not regulate or control how that third party uses your personal information. You should always ensure that you read the privacy policy of any third party.

## **20. UPDATES TO THIS PRIVACY POLICY**

20.1. We may update this Privacy Policy at any time.

20.2. We encourage you to regularly review this Privacy Policy to stay informed about our privacy practices.

## **21. HOW TO CONTACT US**

21.1 If you have any complaints, requests or questions about how your personal information is handled by Workforce you have a privacy concern or you wish to make a request or a complaint relating to your personal information, please contact us.

21.2 You can reach us at: [popia@workforce.co.za](mailto:popia@workforce.co.za).

21.3 You also have the right to lodge a complaint with the Information Regulator.

## **22. REVIEW**

This policy will be reviewed annually to ensure it meets the objectives of the relevant legislation and remain effective for the Group and may be changed at any time at the discretion of the Board of Directors.