



WE DO **IT** YOUR WAY

**EQ PLUS TECHNOLOGIES
PRIVACY AND DATA PROTECTION POLICY (POPIA)**

DOCUMENT CONFIGURATION

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1 INTRODUCTION

We value your Personal Information and intend to give you as much control as possible over the information we collect. We are also committed to protecting your Personal Information and your right to privacy. The purpose of the below is to inform you on what Personal Information we collect, how we obtain and use this Personal information, as well as comply to protect your personal data.

2 CONSUMER PROTECTION ACT AND THE PROTECTION OF PERSONAL INFORMATION ACT

If any party of this Privacy Notice is regulated by or subject to the Consumer Protection Act or the Protection of Personal Information Act, No. 4 of 2013 ("POPIA"), it is not intended that any part of this Privacy Notice contravenes any provision of the Consumer Protection Act or POPIA. Therefore, all provisions of this Privacy Notice must be treated as being qualified, to the extent necessary, to ensure that the provisions of the Consumer Protection Act and POPIA are complied with. No provisions of this Privacy Notice (or any contract governed by this Privacy Notice):

- does or purports to limit or exempt us or any person or entity from any liability (including, without limitation, for any loss directly or indirectly attributable to our gross negligence or wilful default or that of any other person acting for or controlled by us) to the extent that the law does not allow such a limitation or exemption;
- requires you to assume risk or liability for the kind of liability or loss, to the extent that the law does not allow such an assumption of risk or liability; or
- limits or excludes any warranties or obligations which are implied into this Privacy Notice (or any contract governed by this Privacy Notice) by the Consumer Protection Act or POPIA (to the extent they are applicable) or which we give under the Consumer Protection Act or POPIA (to the extent they are applicable), to the extent that the law does not allow them to be limited or excluded.

3 COMMITMENT

EQPlus strives to ensure that our use of Personal Information of data subjects is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving our offerings and your experience. Reference to "EQPlus", "we", "us" or "our" in this notice means EQPlus Technologies. EQPlus respects privacy and is committed to protecting the privacy of visitors to this site. EQPlus seeks to employ best practice when it comes to the collection and processing of personal information in accordance with data protection or privacy legislation.

EQPlus is not responsible for information captured and processed on any website linked to our website.

This Online Privacy Notice sets out what we will do with any Personal Information we collect from or about you, or that you provide to us, when you use our services or apply for any Job Opportunity.

Please read this Privacy Notice carefully to understand our views and practices regarding your Personal Information and how we will treat it.

This will enable you to properly understand the manner in which EQPlus will process your Personal Information.

4 PERSONAL DATA WE COLLECT

EQPlus may collect, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your Personal Information in a way set out in this Privacy Notice. When we do one or more of these actions with your Personal Information, we are "Processing" your personal information. "Personal Information" refers to private information about an identifiable person (which includes natural persons as

well as juristic persons, such as companies or trusts). Personal information does not include information that does not identify a person (including in instances where that information has been de-identified). The type of personal information that we collect about you may differ based on the services that you receive from EQPlus.

We may process different kinds of personal data about you which we have grouped together as follows:

- Identity Data, which includes information concerning your name, username or similar identifier, marital status, title, date of birth, gender, race and legal status, as well as copies of your identity documents, photographs, identity number, registration number and qualifications.
- Contact Data, which includes billing addresses, delivery addresses, email addresses and telephone numbers.
- Financial Data, which includes bank account and payment card details, insurance information, and financial statements.
- Transaction Data, which includes details about payments to and from you.
- Service Data, which includes information concerning your interactions with EQPlus.
- Marketing and Communications Data, which includes your preferences in receiving marketing from and your communication preferences.

If any of the information you provide to us contain special personal information such as health, religion, ethnic or race information, your consent is the lawful basis on which we rely to process such information unless any other lawful basis exists allowing us to process such information. We do not provide services directly to children, and our site is not available for use by any person under the age of 18 years without consent and supervision from a competent person such as parent or a legal guardian. This Privacy Notice also applies in a case where a child makes use of our website with the consent from a competent person. Use of our website by a child without the relevant consent from a competent person is prohibited. EQPlus may also process, collect, store and/or use aggregated data, which may include historical or statistical data ("Aggregated Data") for any purpose. Aggregated Data could be derived from your personal information but is not considered personal information as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we will treat the combined data as personal information which will be used in accordance with this Privacy Notice.

5 HOW WE COLLECT PERSONAL INFORMATION

We collect your personal information in two ways, namely:

- through direct or active interactions with you; and
- from third parties.

Direct or active collection from you, we may require you to submit certain information in order for you to access certain portions of the Website and to enable us to provide certain services to you (e.g. providing further requested information, applying for a vacancy, etc.) or to conclude an agreement with us, or to fulfil our statutory obligations. We also collect information directly from you when you communicate directly with us, for example via e-mail, telephone calls.

We may also collect your details through general feedback forms, site comments and forums. If you contact us, we may keep a record of that correspondence.

Information collected from third parties EQPlus may receive personal information about you from various third parties and public sources and will treat that information with due care.

6 HOW THE INFORMATION WE COLLECT IS USED

Personal information provided to EQPlus by you will only be used for the purposes stated when the personal information is requested. We may use your personal information:

- to provide our services to you.
- to conduct EQPlus' recruitment exercises, including referrals, and hiring processes, including the capturing of a job applicant's details and the providing of status updates to such a job applicant. In this context EQPlus will conduct criminal record and credit checks;
- to provide you with marketing that is relevant to you, or to direct information concerning EQPlus;
- maintain and update our customer, or potential customer databases;
- to protect our rights in any litigation;
- communicate with you and keep a record of our communications with you and your communications with us;
- inform you about any changes to the Website, the Privacy Notice or other changes which are relevant;
- for any other purposes relevant to our business activities, provided they are lawful. EQPlus will restrict its processing of your Personal Information to the original purposes for which it was collected, unless EQPlus reasonably considers that it is required to be processed for another purpose and that purpose is compatible with the original purpose. If you would like us to explain how the further processing for the new purpose is compatible with the original purpose, please contact us.

7 SHARING OF YOUR PERSONAL INFORMATION

We will not intentionally disclose, for commercial gain or otherwise, your Personal Information other than as set out in this Privacy Notice or without your permission. EQPlus may share your Personal Information under the following circumstances:

- to our agents, advisers, service providers and suppliers which have agreed to be bound by this Privacy Notice or on terms which offer the same level of protection as this Privacy Notice;
- to our employees, suppliers, service providers and agents if and to the extent that they need to know the information in order to provide the services for or to us for which they have been appointed, such as hosting, development and administration, technical support and other support services relating to the Website or the operation of the EQPlus business. We will authorise any information processing done by a third party on our behalf, amongst other things by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions;
- in order to enforce or apply any other contract between you and us;
- in order to protect our rights, property or safety or that of our customers, employees and prospective employees, contractors, candidates and prospective candidates, suppliers, service providers, agents and any other third party;
- in order to mitigate any actual or reasonably perceived risk to us, our customers, employees and prospective employees, contractors, candidates and prospective candidates, agents or any other third party; and
- to governmental agencies, exchanges and other regulatory or self-regulatory bodies if required to do so by law or if we reasonably believe that such action is necessary:
 - to comply with the law or any legal process;
 - protect and defend the rights,
 - property or safety of EQPlus,
 - or our customers, employees and prospective employees, contractors, candidates and prospective candidates, suppliers, service providers, agents or any third party;
 - detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorized use of the Website and/or contravention of this Privacy Notice; and

- protect the rights, property or safety of members of the public. If you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities.

8 CROSS BORDER SHARING OF YOUR PERSONAL INFORMATION

Information that we collect from you may be collected in, or transferred to, a destination outside of South Africa. Such destination may not have comparable data protection legislation, and such collected information may also be processed by staff operating outside South Africa who work for us or by one of our contractors. However, we will ensure that there is either binding corporate rules or a binding agreement in place to ensure your information is processed in line with South African privacy legislation and this Privacy Notice. Please contact us if you want further information on the specific mechanism used by us when transferring your personal information outside of South Africa or the destination in which we collected the personal information.

9 STORING OF PERSONAL INFORMATION

Personal information that you provide to us will be stored electronically on our servers or those of our service providers, with reasonable organisation and technical safeguards in place to protect this personal information.

We may keep and process some or all of your personal information if and for as long as:

- we are required or permitted by law or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

To determine the appropriate retention period for personal information, EQPlus will consider, among other things, the quantity, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means. EQPlus will always comply with applicable legal, regulatory, tax, accounting or other requirements as they pertain to the retention of personal information.

10 PROTECTION OF PERSONAL INFORMATION

We make every effort to keep the personal information we hold updated, complete and accurate. It is your duty to provide EQPlus with your most up to date personal information and you can do so in the following ways:

- Update your information on our website: www.eqplus.co.za
- Send updated information to your Recruiter / Account Manager or email info@eqplus.co.za:
 - To require access to any of your personal information we have on our database; or
 - If you wish to notify us of any change, modification or correction; or
 - Would like to have your personal information removed from our records.

We will require suitable proof of identity from you before we can action any of the above requests.

11 YOUR RIGHTS

Please note that, you have rights under data protection laws in relation to your personal information. You have the right to:

- Request access to your personal information (commonly known as a "data subject" access request"). This enables you to receive a copy of the personal information that EQPlus has about you. We may refuse your request for access or disclosure of your personal information if any of the grounds permitted in law applies.
- Request correction of the personal information that we hold about you. This enables you to ensure that any incomplete or inaccurate data that EQPlus holds about you is corrected. To exercise this right, you should contact us via email and inform us that your data is incomplete and/or inaccurate. You will need to point out what you believe is inaccurate or incomplete and explain to us how we should correct or complete it as well as provide us with the evidence of inaccuracies where available. On receipt of your request, we will, as soon as reasonably practicable, correct or complete your personal information.
- Request erasure of your personal data. This enables you to request that EQPlus delete or remove personal information where there is no lawful basis for us continuing to process or retain it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to the processing thereof where we may have processed your information unlawfully or where we are required to erase or de-identify your personal information to comply with applicable law. EQPlus may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Withdraw consent at any time where we are relying on consent to process your personal information. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at any time you withdraw your consent. Please note that we may continue to process your personal information in certain instances where we are not relying on your consent.
- Right to object. You have a right to object in accordance with applicable data protection or privacy legislation, at any time, from us processing or using your personal information and we may no longer process your personal information. Should you require to exercise your right to object, you should inform us that you do not want us to process your personal information and state the reasons why we should stop using such personal information to which you object.

12 REVISIONS TO THE POLICY

We may amend this Privacy Policy from time to time in order to stay compliant with relevant laws.

13 CONTACTING EQPLUS IN RELATION TO PERSONAL DATA

Please send any queries to info@eqplus.co.za. In addition, you can also contact 012 640 0147

14 APPROVAL

Frik van der Westhuizen

Chief Executive Officer

Date: