



## Redheads Group

Redheads Engineering Solutions (Pty) Ltd

Registration number 2006/031505/07

Redheads Engineering Services (Pty) Ltd

Registration number 2009/022667/07

Redheads SRE (Pty) Ltd

Registration number 2017/241432/07

Redheads TMS Turbomachinnenservice SA (Pty) Ltd

Registration number 2021/421353/07

## Protection of Personal Information Act 4 of 2013 Policy

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## Introduction

The Redheads Group, founded in Germany, is an international provider of engineering services to industrial, commercial, retail, institutional and government sector clients.

We offer clients the option to use Redheads Group as a service provider, thereby accepting full responsibility for project completion and correctness. Redheads Group can also provide seconded staff to help clients complete projects, or even supply consultants to give insights onto project matters. If specialized staff are needed by a client, Redheads Group can be used to find these individuals by means of recruitment, or to use these individuals on service provider contracts.

Redheads Group is committed to protecting your privacy and complying with applicable data protection and privacy laws set out by the Protection of Personal Information Act 4 of 2013 Policy that has come into effect on the 1<sup>st</sup> of July 2021. This POPI Privacy Policy will inform you as to how we process your Personal Information and tell you about your privacy rights and how the law protects you as our client and candidate.

Clients, job applicants or employee (hereafter referred to in the first person "you") who submit Personal Information to the Redheads Group (hereafter referred to in the first person plural "we") will be seen as your consent for us to process the provided Personal Information.

## Important information

### Purpose of this POPI Privacy Policy

This POPI Privacy Policy aims to provide you with information on how The Redheads Group processes Personal Information. This could be done through sourcing or gathering of personal or special Personal Information through various third-party organisations, including but not limited to any data you may provide when you apply to any publicly posted employment opportunities, through information received on our webpage job portal, or by direct contact made to us in any form digital, verbal or by presenting a hardcopy.

It is important that you read this POPI Privacy Policy so that you are fully aware of how and why The Redheads Group are using your Personal Information. This POPI Privacy Policy is there to supplement other notices and privacy policies and is in no way intended to override them.

### Responsible Party

The Redheads Group is the responsible party for your Personal Information that you have provided us consent to process.

The Redheads Group have appointed an information officer who is responsible for overseeing questions in relation to this POPI Privacy Policy. Should you have any questions about this POPI Privacy Policy, including any requests or query's, please feel free to contact the Information Officer by using the details supplied details below.

### Contact details

Our Information Officer's contact details:

Name: Swen Nürnberger  
Postal Address: PO Box 71043, The Willows, 0041, South Africa  
Physical Address: Unit C2, Office@Nature, 500 Botterklapper Street, The Willows, 0041  
Telephone: +27.12.816735  
Email: swen@redheads.co.za  
Website: www.redheads.co.za

You have the right to submit a complaint at any time to the Information Regulator (South Africa) under the following page (<https://www.justice.gov.za/inforeg/index.html>). The Redheads Group would, however, appreciate the opportunity to address any of your concerns before you approach the Information Regulator. Any such contact can be directed in the first instance to the Information Officer at the above contact details. He will strive to resolve the complaint as good and swiftly as he can.

### Changes to the POPI Privacy Policy and your duty to inform us of changes

Our Information Officer will keep our POPI Privacy Policy under regular review. This version was last updated on 27.09.2020. The Redheads Group does have archived versions available. These can be obtained by contacting the Information Officer via the contact details provided. Any changes made to our POPI Privacy Policy in future will be made available to you on our website. The new POPI Privacy Policy will come into effect the moment The Redheads Group makes it available on our website or by reference in any communication to the relevant person whose Personal Information we have on record.

It is important that the Personal Information we hold about you is accurate and current. The Redheads Group therefore request that you keep us informed should your Personal Information changes during your relationship with us.

The Redheads Group does not have control over the third-party websites sites or portals who provide us with a service as part of their own offering, or how these sites gather and process your Personal Information. We cannot be held responsible for any wrongful handling of Personal Information by our suppliers.

Our job posts may be linked to third-party websites or portals. These may require signing in or providing additional Personal Information. Submitting your Personal Information via a third-party website or portal or applying to a job post on any third-party website, and in the process providing such sites with your Personal Information, requiring you to disclose your Personal Information to such a third-party site or entity which operates a website linked to us is done so under your express knowledge and consent. The Redheads Group shall not be liable for any loss or damage, howsoever arising, suffered by you because of the disclosure of such information to the third-party website or platform. This is because we do not regulate or control how any such third-party website or platforms use your Personal Information. You should always ensure that you read the POPI Privacy Policy of any third-party website or platforms you use. When you leave our website, we encourage you to read the POIP Privacy Policy of whatever website or Portal you visit.

## What Personal Information is collected and why

Personal Information means the information as per the Abbreviations and definitions.

The Redheads Group may collect, use, store and transfer different kinds of Personal Information about you. Should you decide to engage with The Redheads Group, we may request that you provide the following type of Personal Information:

- Personal Identification: first name, last name, ID number, professional registration ID
- Contact Details: Contact number and email address, area based residential information
- Career History: any data relating to your past present career and education history, including but not limited to employee details, job function, projects assigned and reason for end of employment
- Special Personal Information means information as defined under section 26 of the POPI Act (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences.
- You may choose to provide additional Personal Information to us, in which event you agree to provide accurate 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

Submission of Personal Information on behalf of another: If you provide information on behalf of someone else, then it is your responsibility to obtain the necessary consent from the person before making the Personal Information available to The Redheads Group. On the receipt of such Personal Information, we assume that the necessary consent has been obtained and we will process the Personal Information as per your instructions. By submitting such Personal Information on behalf of another person, you indemnify us against any third-party claim, where such third-party claim relates to Personal Information that has been processed without the necessary consent or other available exception allowed by law.

In responding to your e-mail correspondence, we may request additional information to further assist you and may require further processing of such Personal Information. The Redheads Group hereby takes the providing of such information as consent to do so.

The Redheads Group may need to collect Personal Information by law, or under the terms of an agreement we have with you, and if you fail to provide that data when requested, we may not be able to perform the service we offered or are trying to offer to you accurately. In such cases, we may have the right to step out of such an agreement you have with us, we will notify you of such a situation at the time of such occurrence.

## How Personal Information is collected

Different methods are used to collect data from and about you, including the below but are not limited to these alone:

**Direct interactions:** where you provide The Redheads Group with your Identity and contact information by corresponding with us by phone, email or otherwise. This includes Personal Information you provide when you apply for our services or any Listed Job Openings via our web portal or job listings page available under the following two links <https://careers.redheads.co.za/> or <https://careers.redheads.co.za/submit-cv>.

**As a Referral:** where an acquaintance or person or past company contact you have known provides us with your Personal Information, in which case we obtain your consent to store your data at the earliest opportunity.

**Third parties, digital platforms, or publicly available sources.** We will source Personal Information about you from various third parties, digital platforms and public sources as set out below:

- Third parties and digital platforms such as [Linked in](#), [P-Net](#), [Career Junction](#) or any other form of data brokers or aggregator these include any Personal Information received from publicly available sources such as [MIE](#), [ECSA](#), [ECASA](#) but not limited to the above mentioned.

## How your Personal Information may be used

We shall not sell your Personal Information in any form, be it in digital or hardcopy form.

- We shall only use Personal Information within the framework of the law. Most commonly, we shall use Personal Information in the following circumstances:
  - Where you have given us your consent; or
  - Where we need to perform the contract or service, we are about to enter or have entered into with you; or
  - Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests; or
  - Where we need to do so by Law.
- The Redheads Group will ensure to get your consent before sending or processing/further processing any of your Personal Information. You have the right to withdraw consent at any time. All employees are responsible for ensuring that the collection and processing of Personal Information received or collected from you, is done so with your consent in writing (in an email, consent form (digital or written) or per digitally signed document) or verbal agreement (to be documented in Vincere, our Digital ATS/CRM), and that the received Personal Information is protected from threats, whether internal or external, deliberate, or accidental. Employees will be required to report any security breaches or incidents to the Information Officer for assessment and further processing.

## Purposes for which we will use Personal Information

- Below is a table depicting a description of various ways in which we plan to use your Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- Note that we may process Personal Information for more than one lawful ground depending on the specific purpose for which we are using the data. Please contact us if you need details about the specific legal ground, we are relying on to process your Personal Information where more than one ground has been set out in the table below.

Purpose of Activity	Type of Data	Lawful and Legitimate Reason for Processing this information
Recruiting	Personal Identification, Contact Details, Career History, Special Personal Information	To recruit and represent you to any of the Job Oppertuntiy's we have available with our client
Tender Submission	Personal Identification, Contact Details, Career History, Special Personal Information	For the submitting of Documentation to aid in the application of a tender that in turn will open Oppertuntiy's for employment of such submitted candidates
Consulting	Personal Identification, Contact Details, Career History	For the consultant to be utilised for internal or client projects the Redheads Group is involved with.
HR as a service / Internal HR	Personal Identification, Contact Details, Career History, Special Personal Information, Account information, Tax information	Where the Redheads Group is providing a HR service to a client and requires such information to successful operate to provide such a service, For the Internal HR management of Employees
Secondments	Personal Identification, Contact Details, Career History, Special Personal Information	Where we will require such information to successfully place a candidate or Employee at a client for a duration of Work
Financial	Personal Identification, Contact Details, Career History, Special Personal Information, Account information, Tax information	To processing salaries and Timesheets to complete monthly payments to employees, conclude financial yearend submission, Tax submissions to relevant Government body's

The Redheads Group only shares Personal Information with other companies or individuals in the following circumstances:

- Where we have your consent to do so. We will always request consent for the sharing of any Personal or Special Personal Information.
- For Personal Information to be shared by The Redheads Group with our clients or processed requires that the parties agree to process such information based on our instructions and in compliance with this POPI Privacy Policy and any other appropriate confidentiality and security measures.
- In the following instances, the Redheads Group believes that such access, use, preservation, or disclosure of such information is reasonably necessary to do so:
  - To satisfy any applicable law, regulation, legal process or enforceable governmental request;

- To enforce applicable Terms of Use, including investigation of potential violations thereof;
- To detect, prevent, or otherwise address fraud, security, or technical issues; or
- To protect against imminent harm to the rights, property or safety of The Redheads Group, its users or the public as required or permitted by law.

#### Change of purpose

- We will only use your Personal Information for the purposes for which we collected it, unless there is another reason that is compatible with the original purpose. Such Reason compatible with the original purpose, will be communicated and further consent will be requested before such processing is commenced.
- If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law to do so.

## International transfers

Some of The Redheads Groups clients may also be based outside your country so there may be processing of your Personal Information that could involve a transfer of data outside your country of residence.

Whenever The Redheads Group transfers your Personal Information out of your country of residence, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Information to countries that have appropriate data protection and privacy legislation to protect your Personal Information.
- Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Information is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organisational measurements to protect your Personal Information similar to the conditions under the POPI Act or where applicable the principles under the GDPR.
- By submitting your Personal Information to us you consent to the potential transfer of your Personal Information outside the borders of your country this will only be done as advised.

## Data security

The Redheads Group has put in place appropriate technology and organisational measures to prevent any breaches of the stored Personal Information. In addition, the Redheads Group limits all access to Personal Information to those employees, business partners and contractors who have a business need to know. They will only process Personal Information on our instructions, and with your consent. They are subject to a duty of keeping all Personal Information confidential.



In the event of a breach being identified, all access to any location, system, or platform where Personal Information is held by the Redheads Group will be restricted/blocked from the point and time where the breach is suspected. The breach will then be investigated further, and all other necessary steps will be taken to mitigate any further loss or access to any Personal Information through such a breach. Any affected users will be informed as per one of the advised methods of communication stipulated in The Protection of Personal Information Act 4 of 2013 as soon as possible, even if it is only suspected.

## Data retention

The appropriate retention period for your Personal Information will be subjected to a grading of the amount, 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, and the applicable legal, regulatory, tax, accounting, or other requirements.

By law we must keep basic information about our clients and staff for five years after they cease being clients or staff for tax purposes.

We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

You can ask us to delete your data and ask that you look at the advised the section stipulated under Legal rights for further information.

## Legal rights

You have the following rights under data protection laws in relation to your Personal Information:

- Request for Access: Request access to Personal Information (commonly known as a "Candidate / Client Personal information access request"). There may be a fee associated with this request – see below. This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
- Request Correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process 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 processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we 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. Take Note: Erasure of your Personal Information shall further not limit our rights

in terms of Aggregate Data and Pattern Data. An erasure request can be sent to same contact details as above.

- Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful, but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your Personal Information to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Contact us if you need to transfer your Personal Information.
- Withdraw consent at any time where we are relying on consent to process your Personal Information. However, 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our information officer.

Apart from any prescribed fees under any applicable data protection legislation, you will not have to pay a fee to access your Personal Information or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

The Redheads Group has a prescribed time limit to respond to such requests and we try to respond to all requests within 30 (thirty) days. But this could take longer if the request is complex, or you have made several requests. In such a case, we will notify you of our progress and keep you updated

For the Redheads Group to process such request there may be specific information we would require from you to help us confirm your identity. This is a security measure to ensure implemented so that no Personal Information is disclosed to any person who has no right to receive it. Further contact may be initiated for you to ask you for any further information to help speed up our response to any request.

## Abbreviations and definitions

TERM / ABBREVIATION	DEFINITION
POPIA / (POPI) Act	Protection of Personal Information Act
Employees	Refers to all full-time and limited duration contract staff of the Redheads Group of company's
Candidate/s	Are any applicants and work-seekers contacted by Redheads or who initiated contact towards Redheads
VC	Vincere referred to as VC in this document, the web-based CRM program used to collect and store all candidate information
Personal Information/Special Personal Information	This includes but is not limited to full name, ID, contact details, personal CV, certification records and documents checked by Managed Integrity Evaluation (MIE), address, agreements, contracts, Corporate IP (Intellectual property), your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences, documentation received in any form from a person or client
Client/s	Any organisation that has signed an agreement with the Redheads Group in terms of a service that is being provide to the client/s
CRM system	Customer Relation Management System
The Redheads Group	Refers to the group of company including but not limited to Redheads Engineering Solutions (Pty) Ltd Redheads Engineering Services (Pty) Ltd Redheads SRE (Pty) Ltd Readheads TMS Turbomachinnenservice SA (Pty) Ltd
POPI Act	The Protection of Personal Information Act 4 of 2013
POIP Privacy Policy	The Policy drafted by each individual company to advise on how they process and Safeguard Personal information
IO	Appointed Information Officer
IR	Information Regulator