

PRIVACY POLICY

Introduction

The Assign Services Group consists of several affiliated, yet independent, member companies that may share resources and infrastructure to meet common business interests. Member companies of the Assign Services Group in this policy may also be referred to as the “Organisation”.

This *Privacy Policy* extends to all member companies of the Assign Services Group, namely: Assign Business Support Services CC; Assign Cleaning Services CC; Assign Commercial Services (Pty) Ltd; Assign Freight Management Services (Pty) Ltd; Assign Services (Pty) Ltd and Assign Technical Services (Pty) Ltd.

The Organisation is obligated to inform all customers of the laws and regulations set out in the Protection of Personal Information Act (POPIA) which relates to the lawful collection, processing, protection and destruction of Personal or Special Personal Information that is entrusted to the Organisation in the performance of services to Client or users, as may be requested from us. Additionally, the Organisation discloses that it is fully compliant with the Promotion of Access to Information Act (PAIA) insofar as to the rights of data subjects to request access, correction, and the erasure of their Personal information. Therefore, the Organisation has created measures to protect the privacy of personal information and to encourage data subjects, who have any requests or enquiries, to contact the Organisation’s Information Officer.

Scope of Application

This policy, in compliance with the rules and regulations of PAIA and POPIA regarding Personal Information, is applicable to all natural and juristic bodies who are legally defined as a Data Subjects. The Organisation encourages data subjects to engage with the IO (Information Officer) regarding any matter pertaining to PAIA/POPIA. The type of engagement with the IO may include, but is not limited to, making a request, complaint, or an enquiry about the data subject’s personal information whether it is regarding how it is collected, processed, retained, protected, and erased.

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About the Organisation

The Assign Services Group provides a range of business services to its clients which include employment-related business solutions and where services may be of a specialised nature. For more information on the Assign Services Group please see the “About Us” link on the Organisation’s website at www.assign.co.za.

Definition of Personal Information

“Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- a) information relating to the race, gender, sex, pregnancy, marital status, nationality, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

Purpose of Collecting and Processing PI:

The Assign Services Group provides various business solutions that will inherently require both Personal and Special Personal Information in order to perform services and carry out its duties.

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The primary reasons for the Organisation to collect and process certain information from data subjects, is to:

- a) attend to the legitimate interests of users/clients;
- b) perform and fulfil contractual duties and obligations;
- c) to perform recruitment services and associated employment-related procedures;
- d) providing (with their consent) client/candidate or user information to verified partners of the Organisation (“Supplier-operators”), for example, MIE (Managed Integrity Evaluations), to confirm the authenticity of certifications and to do criminal record checks. Supplier-operators are only authorised to process this information for the purpose in which it was sent to them and cannot be processed for any other reasons. Other examples of Supplier-operators include financial institutions for employee remuneration purposes, IT and telecommunication service providers for business operations, data storage and security purposes, ATS (applicant tracking system) software services for recruitment purposes;
- e) comply with statutory obligations;
- f) comply with legal and regulatory duties and to protect the rights of the Organisation;
- g) if given consent: engage in various forms of direct marketing;
- h) do market research and statistical analyses to improve business services, operations, and functions;
- i) research customer satisfaction;
- j) verifying a data subjects’ identity, information, reference checks, and credentials;
- k) to create a job application process that is effective, secure and efficient.

Failure to provide the information needed for the organisation to perform a service, may result in the Organisation being unable to render a service.

Lawful Basis

The Organisation is dedicated to adhering to the conditions of lawful processing of Personal and Special Personal Information. In doing so, the Organisation endeavours to render services that meet the lawful requirements based on mutual interests concerning current and prospective: clients, employees, candidates, jobseekers and consumers alike, to achieve the business objectives of the Organisation.

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Records Management

The Organisation strives to provide the most accurate information to stakeholders and to data subjects. Therefore, the Organisation endeavours to securely and legally retain the data received from employees, clients, consumers, candidates, jobseekers and suppliers until such a date as the data is either considered outdated, obsolete, inaccurate or if the data subject has successfully applied to have their data destroyed.

The Organisation would like to ensure that it is compliant with the legal obligations regarding the retention of Personal and Special Personal Information. Hence, the Organisation will only retain Personal and Special Personal Information:

- a) For as long as is legally required by the Organisation.
- b) Until the data is deemed obsolete for business function purposes.
- c) If a data subject has requested the destruction of their Personal Information held by the Organisation.

The only exceptions regarding retention periods would be for legal or statutory obligations or proceedings or if the data subject has specifically provided the Organisation recorded consent to retain data. A guideline for data types and their legally stipulated retention periods can be viewed on SAICA’s website (www.saica.co.za) “Guide on The Retention of Records”.

The Organisation is legally required to have sufficient and effective security measures in place to ensure the privacy of the information and data it retains.

The Organisation ensures that adequate (technical and operational) systems and response plans are in place to protect the information it stores and to prevent unauthorized access and usage of said information to the best of its ability.

Regarding Supplier-operators with whom the Organisation may share personal information, the Organisation ensures that contracts with Supplier-operators require that they follow the rules and regulations stipulated in POPIA to ensure the security of Personal Information.

These security measures will be reviewed annually and adjusted when needed.

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Data Subjects Rights

Section 51 of The PAIA Manual states Data Subjects have the right to request:

- a) Access to personal information that the Organisation may have in its possession;
- b) To rectify or change outdated or incorrect data that is retained by the Organisation in order to perform their business functions accurately. This is an obligation of the data subject to ensure the organisation has accurate information to properly render their services;
- c) For the destruction of personal information;
- d) For the restriction of processing specific information.

For more information on the procedures for data subjects to either request for the above or to find out more about their rights pursuant to the Promotion of Access to Information Act, please refer to the PAIA Manual (found on the Organisation's website, www.assign.co.za) or data subjects may contact the Organisation's Information Officer. The Organisation's IO contact details can be found on the Organisation's website and at the end of this Policy.

Sources of Personal Information

The Organisation collects PI (Personal Information) and SPI (Special Personal Information) from data subjects which includes but are not limited to clients, employees, suppliers, applicants, candidates, and users or from publicly available means. PI and SPI will always be obtained through legally complaint means by the Organisation. This includes, but is not limited to, obtaining consent for the processing a data subjects PI or SPI through legal contacts, written agreements, or verbal agreements that comply with the rules and regulations stipulated in POPIA.

Website Usage

- a) The Organisation will only process personal and special personal information obtained from the Organisation's website when a data subject has provided consent for the Organisation to process such information for the purpose of the Organisation to provide services.

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- b) The Organisation is not liable for personal information submitted to 3rd parties that may have links on the Organisation’s website unless the Organisation has access to this Personal Information. We encourage all website users to examine the Privacy Policy on all websites before information is disclosed.
- c) Any posts made on a public forum, for example a comments section or a social media platform where a user submits personal information, is considered public information and can be processed by anyone. The Organisation will not be held liable for any information you post publicly. Users are encouraged to carefully consider any information that may be disclosed on public platforms.
- d) The Organisation’s website does track and collect standard internet visitor usage information on their website through Cookies. This information will only be processed for statistical and business research purposes.

Cookies:

- a) The Organisation’s website makes use of Cookies. A Cookie is a text file that is saved in the Cookie file of a web browser. The file does not run any program or perform any function. The file is read by a web server in the domain that issued the Cookie to the web user. The purpose of a Cookie is to optimize a user’s experience on the Organisation’s website as it remembers log-in details and can match preferred interests of the user quickly.
- b) The Cookie itself cannot be used to personally identify a body. The unique identifier of the Cookie will usually consist of the:
 - Domain name;
 - “Lifetime” of the Cookie;
 - A randomly generated number.
- c) While the Cookie is utilized for a better user experience, users do not have to accept Cookies.
- d) Web users can delete Cookies through the setting of their web browser.
- e) Any data collected by the Organisation will be used for statistical and business research purposes regarding the usage of the Organisation’s website.

Categories of PI Collected and Processed:

Due to the nature of the Organisation, Personal and Special Personal information is required to fulfil services.

This information includes but is not exclusive to:

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- Name, surname, age, contact details, address, race, gender identity, sex, marital status, religion, physical and mental health, language, nationality, and ethnic origin.
- CV information which may include educational, criminal, medical, employment, and financial history or background.
- Biometric information, verifying reference checks, and collecting previous employer references/opinions on the data subject/natural or juristic body.

Consent:

The Organisation will not process Personal Information of Special Personal Information without consent unless processing is necessary for the establishment, exercise, or defence of a right or obligation in law.

Data subjects that provide the Organisation with Personal Information, provide the Organisation with consent to process information for the sole purpose for which it was provided by the data subject.

Regarding marketing, the Organisation will only direct market once we have received consent. Any electronic marketing material sent by the Organisation will always include an opt-out feature to allow a recipient of electronic marketing material to manage further communications from the Organisation.

Disclosure of Information

The organisation will only disclose Personal Information in the following circumstances:

- To service providers of the Organisation who are involved in the delivery of goods or services to the Organisations and/or data subject;
- Where the Organisation has a duty or right to disclose information according to law, legal proceedings, or industry codes;
- In order to protect the rights of the Organisation.

The organisation will ensure it has agreements in place with all clients and suppliers to ensure they comply with information privacy laws (POPIA).

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Contact Details

Information Officer Details:

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Physical address: 3, 5th Street, Wynberg, Johannesburg, 2090

Email address: compliance@assign.co.za

Assign Business
Support Services CC

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2007/036388/23

Assign Cleaning
Services CC

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2010/024849/23

Assign Commercial
Services (Pty) Ltd

Reg. No.
2017/ 170412/07

Assign Freight
Management Services
(Pty) Ltd

Reg. No.
2017/170454/07

Assign Services (Pty)
Ltd

Reg. No.
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Services (Pty) Ltd

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