

Privacy policy

Blue Recruiting (Pty) Ltd (company registered in the Republic of South Africa under registration number: 2014/001282/07) including CAs Online ("BR", "we", "us" or "our") is committed to protecting the privacy of our candidates, clients and users of our website and the CAs Online Portal. We want to provide a safe and secure user experience. We will ensure that the information you submit to us, or which we collect, via various channels (including our website, LinkedIn, email correspondence, video recordings, conversations or meetings with our consultants), is only used for the purposes set out in this policy.

Through this Privacy Policy we aim to inform you about the types of personal data we collect from candidates, the purposes for which we use the data and the ways in which the data is handled. We also aim to satisfy the obligation of transparency under the Protection of Personal Information Act, 2013.

For the purpose of this Privacy Policy the controller of personal data is BR. References in this Privacy Policy to our Group of companies is to the parent company of BR, CAs Online and to other trading subsidiaries of Blue Recruiting (Pty) Ltd.

What information is collected?

We will collect your personal details, including but not limited to your name and contact details (together with your e-mail address) and other relevant information from your Curriculum Vitae ("CV"). On occasion this will also include sensitive personal information such as details of criminal convictions and ethnic origin. When we receive your details and CV electronically, this may be through a direct application on one of our websites or an application that you have made through a third-party job board.

We will likely obtain further personal information about you throughout our relationship with you.

How is your Personal Information used?

We will retain, use and disclose your personal information, for our legitimate business purposes including:

- to provide our services to you;
- to maintain our business relationship, where you are a user of any of our websites, a client or candidate;
- to enable you to submit your CV for general applications, to apply for specific jobs or to subscribe to our job alerts or register with CAs Online;
- to match your details with job vacancies, to assist us in finding a position that is most suitable for you and to send your personal information (including sensitive personal information) to clients in order to apply for jobs;
- to retain your details and notify you about future job opportunities other than the specific role for which you have contacted us;
- to direct-market products and services, events, promotions and competitions, reports and other information. Before we do so, you will be given an option to opt-out of such

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communications and an option to unsubscribe will also be provided with each communication;

- to fulfil contractual obligations with our clients;
- to provide further services to you by sharing your personal information with other companies within our Group of companies as well as trusted third parties.
- to release personal information to regulatory or law enforcement agencies, if we are required or permitted to do so;
- CAs Online publishes your CV, documents, video and personal information for CAs Online's registered clients to view. You have the option to elect whether this information is visible to all clients, or only to clients whose job you have applied for. We track your utilization of CAs Online to provide assistance with any difficulties experienced.
- We may also be required to conduct a criminal records, credit, qualification and identity checks against your details. We have processes to obtain your specific prior approval to conduct these checks.

The Legal Basis for Processing your Personal Information

Under the Protection of Personal Information, 2013 – we obtain information based on the following basis:

- **Necessary for entering into, or performing, a contract** – in order to perform obligations that we undertake in providing a service to you it will be necessary for us to process your personal data;
- **Necessary for compliance with a legal obligation** – we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;
- **Necessary for the purposes of legitimate interests** - we will need to process your personal data for the purposes of our legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website and customer experience, informing you about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner;
- **Consent** – in some circumstances, we may ask for your consent to process your personal data in a particular way.

How we share your Personal Information

In certain circumstances we will share your personal information with other parties. Details of those parties are set out below along with the reasons for sharing it.

Other Companies within our Group

Where you are registered as a candidate on our database or CAs Online portal, we will share your personal information with other companies in the Blue Recruiting Group of companies and businesses including CAs Online.

We will share your personal information as above for any or all of the following purposes:

- to provide you with recruitment services;
- for business development;



- for systems development and testing;
- for development and marketing of other products and services;
- to improve our customer service and to make our services more valuable to you; and/or
- to tailor our website and the websites of other companies in our Group when you log on to make them relevant to you personally.

Clients

We disclose your personal information to clients who have vacancies for jobs in which you are interested or clients who have registered on CAs Online.

Trusted Third Parties

We will share your personal information and, where necessary, your sensitive personal information with trusted third parties where we have retained them to provide services that you or our clients have requested, such as:

- employment reference checking;
- qualification checking;
- criminal reference checking (as required);
- verification of details you have provided from third party sources; and/or
- psychometric evaluations or skills tests.

Regulatory and Law Enforcement Agencies

As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under POPI and other laws, we may disclose certain personal information to such bodies or agencies.

New business owners

If we or our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company and their advisors. If this happens, you will be sent notice of such event.

For what length of time will we hold your information

As we often support candidates with placements throughout their careers we may retain information for many years. We conduct regular data-cleansing and updating exercises with our candidates to ensure that the data that we hold is accurate and we are not holding data for too long.

Our standard terms of business state that our clients should retain candidate data such as CVs for the purposes of the specific role you apply for and that, as controllers of your data, they should inform you if they plan to retain your CV on file in order to notify you about potential future roles, or to otherwise hold or use your data for other purposes.

Your rights on Information we hold about you

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.



Right of Access

You have the right at any time to ask us for a copy of the personal information about you that we hold.

Right of Correction or Completion

If personal information we hold about you is not accurate, out of date or incomplete, you have a right to have the data rectified, updated or completed.

Right of Erasure

You have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

Consent

To the extent that we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us using info@casonline.co.za.

CAs Online and job alerts

To subscribe to job alerts emails and mobile messages off our website or CAs Online, you will be required to provide your name and e-mail address, which will be used for the purpose of keeping you informed, by e-mail, Whatsapp or text message of the latest jobs in your nominated industry and to provide you with industry news and other information related to our services.

Should you decide that you no longer wish to receive this information, unsubscribe functions are provided on our websites.

Curriculum Vitae

We give you the option of submitting your CV via our website or by providing your CV to one of our consultants. You can do this either to apply for a specific advertised job or for consideration by our recruitment consultants for positions as they come up.

Your CV will be stored in our database and on CAs Online and will be accessible by our recruitment consultants.

Your CV may also be emailed directly to other companies within our Group of companies for review and entry onto their database to enable them to provide their services to you.

You can update your CV at any time, simply by following the same procedure to submit a new CV. Your old CV will automatically be archived providing the submission details remain the same (for example you submit both CVs using the same email address or you advise the relevant contact of your new submission).

Aggregate Information about MPIR online visitors

We gather information and statistics collectively about all visitors to our website and the websites of all of the companies in the Blue Recruiting group of companies, for example:



- which area users access most frequently; and/or
- which services users access the most.

We only use such data in the aggregate form. This information helps us determine what is most beneficial for our users and how we can continually improve our online services to create a better overall experience for our users.

Complaints

If you are unhappy about our use of your personal information, you can contact us using info@casonline.co.za