

---

## Privacy Policy for Current Employees

May 2021 | Version 1.0

### 1. Introduction

This is our plan of action when it comes to protecting your privacy as our current employee. We respect your privacy and take it very seriously. This policy explains how we handle your personal information, including how we collect, use, disclose, store, and secure it.

### 2. Application

#### 2.1 Where it applies.

We have various policies to address privacy issues for each group whose personal information we process. This policy applies to all our current employees and applies to you as our current employee if:

- you are someone who works for us in exchange for compensation under an employment contract at the present time.

You start being our current employee when you sign an employment contract with us. You stop being our current employee when our employment contract with you terminates or is cancelled.

#### 2.2 Where it does not apply.

This policy does not apply to you where we process your personal information in another capacity, such as: as a prospective employee, a user of our website, or as a customer. The relevant prospective-employee-facing, user-facing, or customer-facing privacy policy will apply in those circumstances where applicable.

### 3. Personal information

Your personal information includes any information about you as an identifiable living human being, such as your:

- curriculum vitae (CV);
- job application forms;
- references and interview notes;
- applicant photographs and videos;
- offers and acceptances of employment;
- race and ethnicity information for the purposes of employment equity and transformation;
- policy acknowledgements or sign-off documents;
- confirmations of employment and other disclosures;
- payroll information (including identity numbers, salary information, and bank account details);
- information necessary to process any court orders regarding payments of debts (garnishee orders);

- benefit information (including pension fund or medical aid information);
- beneficiary and emergency contact information;
- information about severe allergies or health conditions that may require us to make special accommodations;
- full name;
- home address;
- phone number;
- personal email address;
- date of birth;
- identification number; and
- marital status.

## **4. Acceptance and changes**

### **4.1 Acceptance.**

You may not continue to work for us as our current employee if you do not accept this policy or any changes to it.

### **4.2 Changes.**

We may change this policy at any time and will notify you of the changes on our website or by direct contact with you. The changed policy applies to you if you continue to work for us as our current employee following the notification.

## **5. Consent**

### **5.1 Consent to collection, use, disclosure, and storage.**

You consent to us collecting, using, disclosing, and storing your personal information for the purposes provided for in this policy and any other purposes set out or implied when you provide the relevant personal information to us, unless you inform us otherwise. Where your consent is required for us to collect, use, or disclose your personal information, you may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice.

### **5.2 Generally not required.**

We are not generally required to get your consent to collect, use, disclose, or store your personal information. The law allows or requires us to collect, use, or disclose your personal information without your knowledge or consent under certain circumstances.

## **6. Collection**

### **6.1 Direct and indirect.**

We generally collect personal information from you directly wherever possible, but we may sometimes collect it indirectly through third parties. We will comply with the relevant laws for indirect collection where we do so, which means that we may not need to ask your permission before doing so and may collect it without your knowledge and consent in those circumstances. We will do our best to ensure that third parties have the right to give your

personal information to us where we use them to provide us with your personal information.

**6.2 Automatically.**

We collect some of your personal information automatically when you use our:

**IT infrastructure** – the entire organised system of IT structures, facilities, and components necessary for the operation of our organisation, including data, computer networks, cameras and software

**6.3 On submission.**

We may ask you to provide us with your identifying information when you submit other information to us, such as through paper-based forms or online user interfaces.

**6.4 Voluntarily.**

We may ask you to provide us certain optional information on a voluntary basis.

**6.5 Consent to collection.**

We will get your consent to collect your personal information as required in accordance with applicable law when you provide us with it.

**6.6 Purpose for collection.**

We may process your information that you provide to us for the purposes that we indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information.

**7. Use**

**7.1 Processing.**

We may process your personal information to fulfil our obligations to you, the government, and other third parties, including to:

- start, maintain, and end your employment relationship with us;
- decide whether you are eligible for another role or position;
- verify your references and qualifications;
- pay your salary/wages;
- administer your benefits;
- process work related claims, such as workmen’s compensation or insurance claims;
- provide employee training;
- review your performance;
- work out whether you are qualified for a particular job or task;
- gather evidence for disciplinary actions or dismissal;
- compile next-of-kin contact information in the case of emergencies;
- comply with labour law;
- reporting requirements imposed on us by law;
- compile a directory of employees;

- ensure that the company generally keeps personal information secure; and
- achieve anything else that we reasonably require.

## **7.2 Messages.**

We may use your identifying information to send you administrative and update messages about the employee portal or our current employment relationship with you.

## **8. Disclosure**

### **8.1 Sharing.**

We may share your personal information with third parties for the purposes of fulfilling our obligations to you, the government, and other third parties, including with:

- our contractors who help administer our employment relationship with you; or
- third parties as required by applicable law.

### **8.2 Honour this policy.**

We will require anyone that we share your personal information with to honour this policy whenever possible in terms of applicable law.

### **8.3 Mandatory disclosure.**

We may disclose personal information to third parties if required for legal reasons, such as to regulators as required by law or governmental audit, law enforcement as required by a subpoena or court order, or third parties as required by applicable law.

### **8.4 Analytical purposes.**

We may disclose aggregate statistical information that we have derived from your and other current employee's personal information for analytical purposes.

### **8.5 Personnel.**

We may need to disclose personal information to our personnel to do their jobs, but will not do so unnecessarily.

### **8.6 Change of ownership.**

We may assign our rights to the personal information we process to our new Trustees if and when the roles within the association change.

## **9. Storage**

### **9.1 Accuracy.**

We do our best to keep your personal information that we collect as accurate, complete, and up to date as is necessary for the purposes defined in this policy.

### **9.2 Participation.**

We may ask you to update your personal information with our Estate Manager from time to time or give you a way to review it, such as through the employee portal (if and when such is created) or by emailing or phoning the Estate Manager. We will take steps to verify your identity to prevent unauthorised access when doing so.

### **9.3 Retention.**

We will only keep your personal information for as long as is necessary to fulfil our obligations to you, unless you have given us permission to keep it longer or we are otherwise legally allowed to do so.

**9.4 Information security.**

We take the security of personal information very seriously and do our best to comply with applicable information security laws.

We authorise access to personal information only for those employees who require it to fulfil their job responsibilities.

We implement disaster recover procedures where appropriate.

**9.5 General monitoring.**

We will not monitor you or subject you to surveillance constantly. But, we may do so under certain circumstances when you are using our IT equipment or infrastructure. You should therefore have no expectation of privacy with respect to your use of our IT equipment or infrastructure.

**9.6 Computer and email monitoring.**

We may monitor your computer and email use subject to the relevant policies.

**9.7 Work output.**

Your work output belongs to us. We may monitor your work output and use of our IT equipment or infrastructure to create that work output.

**9.8 Surveillance.**

We may monitor your activities on our premises or with our property as our current employee. For example, some of our premises have surveillance cameras to protect against intruders, theft, or vandalism. We routinely destroy anything recorded by surveillance cameras on a schedule, but we may turn those records over to the appropriate authorities if we suspect any wrongdoing.

**10. General**

**10.1 Updating.**

You may update your personal information by contacting us.

**10.2 Limitation.**

We are not responsible for anyone else's privacy policies or practices.

**10.3 Enquiries.**

Please contact us if you have any questions about this privacy policy or how we handle your personal information.