



**PBHSOB**

**PRETORIA BOYS HIGH SCHOOL OLD BOYS ASSOCIATION NPC**

**REG. NO: 1949 / 032412 / 08**

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## Protection of Personal Information Policy for Employees

### 1. Introduction

- 1.1. It's our promise to employees that we respect the trust you place in us and the privacy of the information you share. Part of providing superior customer service includes making sure that we're building a relationship of trust with our employees. Our way of doing that is to let you know in a clear, prominent, and easily accessible way how we collect, use, share, and above all, protect your personal information.

In this policy, the Pretoria Boys High School Old Boys Association, "we", "us", "the Association", "the Organisation" or "PBHSOB" refers to the Pretoria Boys High School Old Boys Association and any other company that forms part of the PBHSOB's corporate family of companies and/or organisations.

We will only collect personal information that is necessary for the purposes described in this policy and will only process personal information in compliance with applicable laws, including the Protection of Personal Information Act (POPIA) and in ways that are for, or compatible with, the business purposes for which the personal information was collected or that are subsequently authorised by you.

- 1.2. This Policy outlines:

- How and why we collect your personal information;
- How your personal information is used and protected;
- When and with whom we share your personal information; and
- What choices you can make about how we collect, use, and share your personal information.

- 1.3. The Association takes steps to ensure that we manage your personal information properly to maintain your trust. We may collect the following categories of personal information. Not all categories may be collected about every individual and this will depend on the purpose for which we need the personal information:

- Personal identifiers, such as name and address;
- Demographic information, such as age and date of birth;
- Location information, such as geo-location information;
- Device and online identifiers and related information, such as telephone number and e-mail address;
- Internet, application, and network activity, such as cookie IDs and browser visits (where applicable);
- Government identifiers, national identification numbers and driver's license numbers;
- Demographic information, such as age and date of birth;

- Financial information, such as tax numbers, bank account details, salary details and claims information;
- Information relating to qualifications, education, training and development (where applicable);
- Information pertaining to Criminal, Medical and Physical History;
- Electronic Communication such as text messages, emails, social media messages etc.;
- Location information, such as geo-location information, postal and residential addresses;
- Audio, visual, and other sensory information, such as audio and video recordings; or
- Employment information, such as occupation, title, licenses and professional memberships.

## 2. Collection of Personal Information

2.1. We collect information from you in a variety of ways. It may be:

- Provided directly by you;
- Collected from a device associated with you or your household;
- Collected through in-practice technology;
- Collected from another company within our family of companies; or
- Collected from an external third-party source.

### ***Information collected from a Device Associated with you***

You passively provide us information through technology. Some of this information may be linked to you personally. This information helps our websites and mobile services work correctly and supports our customer marketing and analytics efforts – our work to understand our employees' needs and provide information about our products and services. Here are some examples:

- **Device Information:** We collect technical information when you visit our websites or use our mobile applications or services. This includes information such as Internet Protocol (IP) address, the type of mobile device you use, your device operating system and browser type, a unique device identifier, the address of referring websites, the path you take through our websites, and other information about your session on our websites.
- **Browsing Information:** We use our own and third-party technologies such as cookies, web beacons, and mobile device identifiers to collect information about the use of our websites and mobile services. We use these tools to provide an integrated and more personalized shopping experience for you. For example: cookies allow us to provide you relevant information as you use or return to our sites; web beacons allow us to know if a certain page was visited, an email was opened, or if ad banners on our websites and other sites were effective. Under certain circumstances, we permit third parties to collect information on our websites for their own business purposes using cookies, web beacons, iframes and similar technologies.
- **Precise Device Location Information:** We may collect information about your location when your device is set to provide location information.

### ***Information we collect through on-Site Technology***

We may collect your personal information from technology we use on our site, such as our facility cameras. We operate cameras in our facility for security and operational purposes, for example, to help us ensure your safety on our Facility to better serve our employees and/or members.

***Information we collect from External Third-Party Sources***

We receive information about you from other sources to help us correct or supplement our records, improve the quality or personalization of our services and marketing to you, and prevent or detect fraud if and where applicable.

***Information Provided Directly by You***

You actively share information with us in various ways in our facility and online. For example, you share information when you:

- Provide Personal details such as full names, surname, address;
- Communication related information such as telephone number and email address;
- Internet, application, and network activity, such as cookie IDs and browser visits (where applicable);
- National identification numbers and driver's license numbers;
- Demographic information, such as age and date of birth;
- Financial information, such as tax numbers, bank account details, salary details and claims information;
- Location information, such as geo-location information, postal and residential addresses;
- Audio, visual, and other sensory information, such as audio and video recordings; or
- Employment information, such as occupation, title, licenses and professional memberships.

- 2.2. All personal information that is supplied to the Association must be accurate, up-to-date, not misleading and complete in all respects. You undertake to immediately advise the Association of any changes to your personal information should any of these details change.
- 2.3. Our goal is to limit the information we collect to the information needed to support our business.

**3. Purpose for Collection of Personal Information**

- 3.1. The information collected and processed by the Association may be used for the following purposes:
- To fulfil your applications or requests for employment;
  - To create and maintain your employment record;
  - To conduct auditing and monitoring of transactions and engagement;
  - To ensure that remuneration is paid into the correct account for service rendered;
  - To protect the security and integrity of our websites, mobile services and our business, and help prevent fraud;
  - To update our operational and technical functionality;
  - To conduct business analysis, such as analytics, projections and identifying
  - To conduct research and development; and/or
  - To fulfil our legal functions or obligations.
- 3.2. All Personal Information which you provide to the Association will be used and/or retained only for the purposes for which it is collected, where after it will be permanently destroyed. We will only retain personal information for longer than the purpose for which it was collected if it is required by law or where you have given consent for us to retain such information for an extended period.

**4. Sharing of Personal Information**

- 4.1. All of the categories of personal information that we collect may be shared with other companies, including those within our corporate family, for a business purpose only once your permission is obtained. We will not sell or rent your personal information for money.

- 4.2. We may share your personal information in limited circumstances, such as to conduct our business, for other companies to offer you and administer your use of co-branded products, in the event all or a part of our business is merged, sold or reorganised, when legally required, as described below, or with your consent.
- 4.3. We will not share your personal information outside of our corporate family of companies, except in the following circumstance:
- **Service Providers** – We provide the tools whereby you share personal information about yourself with service providers that help with our business activities, including billing and refund vendors, payment card processors, and companies that help us improve our products and services (eg. Pay point machines). We require our service providers to keep your personal information secure. We do not allow our service providers to use or share your personal information for any purpose other than providing services on our behalf. Your personal information may be stored and processed by our service providers in the particular country or other locations where the service providers or Company maintain facilities.
  - **Co-Branded Products and Services** – We may share your personal information with companies that offer co-branded products or services only once your consent is obtained. These companies are prohibited from using your personal information for purposes other than offering you, and administering your use of, these co-branded products and services.
  - **Legal Requirements and Protection of Our Association and Others** – We may share your personal information in other special circumstances, which include situations when sharing is required by law, or we believe sharing will help to protect the safety, property, or rights of the Association, our members, or other persons. Examples include:
    - Protecting the health or safety of customers and/or members;
    - Addressing crimes committed on Association property and/or during Association events;
    - Identifying and addressing fraud or financial risk;
    - Providing personal information from cameras to law enforcement at their written request;
    - Responding to a search warrant or other valid legal inquiry; and
    - Responding to an investigative body in the case of a breach of an agreement or violation of law.
  - **Business Transfers** – In the event that all or a part of our business is merged, sold or reorganized (including transfers made as a part of insolvency or bankruptcy proceedings), personal information about you could be shared with the successor business. We will use reasonable measures to help ensure that any successor treats your information in accordance with this Policy.
  - **Advertising Related Activities** – We use data collection devices such as "cookies" on certain pages of the Website to help analyse our web page flow, measure promotional effectiveness, and promote trust and safety. Cookies assist us in providing our services. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the Website and you may be required to re-enter your password more frequently during a session (where applicable). The cookies do not contain any of your personally identifiable information.
- 4.4. We may share aggregated or pseudonymous information (pseudonymous information includes things like: device identifier, type of device, IP addresses, cookies and other information associated with your browsing and app usage) with other companies, such

as publishers, advertisers, measurement analytics providers, and others. We do not share information that directly identifies you (information such as name or email address) with these companies.

- 4.5. We also allow companies that show advertisements on our web pages or our apps to collect information from your browsers or devices via the use of cookies or other technologies if and when applicable. Other companies' use of cookies and other data collection technologies are subject to their own privacy policies, not this one. Like many companies, we may allow cookie matching with select partners. However, these parties are not authorized to access information from Association cookies.
- 4.6. Our Website also links to other websites that may collect personally identifiable information about you. The Association is not responsible for the privacy practices or the content of those linked websites.
- 4.7. Where we need to transfer your personal information outside the borders of South Africa, we will ensure that we only transfer the personal information to countries that have similar privacy laws to those applicable in South Africa or to a party who is contractually bound to comply with data protections obligations which impose no lesser legal requirements than those imposed by POPIA.
- 4.8. Before transferring personal information to a third-party contractor, such as an authorised service provider, the Association will obtain assurances from the third party that it will process personal information in a manner consistent with this policy. Where we learn that a third party contractor is using or disclosing personal information in a manner contrary to this policy, we will take reasonable steps to prevent such use or disclosure.

## **5. With Your Consent**

- 5.1. In circumstances other than those described above, we will ask for your affirmative consent before we share your personal information outside of our corporate family of companies, and we also will not sell or rent your personal information for money.

## **6. Websites and Mobile Applications**

- 6.1. By using our websites, web based systems and/or mobile applications and/or providing and/or updating your information to us, you expressly consent to our collection and use of the information you disclose to us in accordance with this policy. If you disclose any personal information relating to other people to us, you warrant that you have the authority to do so and to permit us to use the information in accordance with this policy.
- 6.2. By using our websites, mobile applications and/or by providing your information to us, you agree to the practices described in this policy and you agree to the Association, its directors, officers, employees, servants, agents and/or contractors and/or other third parties to process (which will include collecting, using and disclosing) your personal information for the purposes stated in this policy.
- 6.3. If you do not agree to this policy, please do not use our websites, mobile applications and/or provide your information to us. Any use by you of our websites, mobile applications and/or any provision by you of your information will be deemed to constitute your acceptance of the terms in this policy.

## **7. Security**

- 7.1. The security and confidentiality of your personal information is important to us. We have implemented technical, administrative, and physical security measures to protect your personal information from unauthorised access or disclosure and improper use.

- 7.2. We are committed to ensuring that our security measures which protect your personal information are continuously reviewed and updated where necessary.
- 7.3. It is important for you to protect yourself against unauthorised access to your account password and/or details. Be sure to log out of your account or to close your browser after you have completed your visit to the web system or mobile application (where applicable).
- 7.4. Whilst we will do all things reasonably necessary to protect your personal information, we cannot guarantee nor do we accept any liability of whatsoever nature for any unauthorised or unlawful disclosure and/or use of your personal information, either by customers and/or members and/or made by any third parties (including third party service providers) who are not subject to our control, unless such disclosure and/or use is as a result of our gross negligence.

## 8. Your Rights

- 8.1. Upon reasonable request and in accordance with POPIA, we will grant employees reasonable access to their personal information and will permit them to correct, amend or delete personal information that is incomplete or inaccurate.
- 8.2. Should you so request, we will provide you with the record or a description of the personal information which we have about you, including information about the identity of all third parties who have, or have had, access to the personal information: (i) within a reasonable time; (ii) at a prescribed fee, if any; (iii) in a reasonable manner and format; and (iv) in a form that is generally understandable.
- 8.3. We will take reasonable steps to ensure that all personal information is kept as accurate, complete and up-to-date as reasonably possible but may not always expressly request you to verify and update your personal information, unless this process is specifically necessary. We expect that you will notify us from time to time in writing of any updates required in respect of your personal information and/or you will update these details directly.
- 8.4. You also have the right to lodge a complaint with the Information Regulator. You can email the Information Regulator with your complaint/query at <mailto:inforeg@justice.gov.za> or call them on 012 406 4818. Visit their website for more details at: <https://www.justice.gov.za/inforeg/contact.html>.
- 8.5. The Pretoria Boys High School Old Boys Association reserves the right to amend this policy at any time. All amendments to this policy will be posted on the Association website.