Work4Ever
LABOUR SOLUTIONS

PRIVACY & DATA PROTECTION

POPIA Privacy Policy

Protection of Personal Information Act 4 of 2013
Republic of South Africa

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BUSINESS LOCATION
Boksburg, Gauteng

WEBSITE
work4ever.co.za

PRIVACY CONTACT
info@work4ever.co.za

PRIVACY AT A GLANCE

Your information, handled with care

A short summary of this policy. The full policy that follows is the binding statement of how Work4Ever processes personal information.

Who we are

WORK4EVER LABOUR SOLUTIONS (PTY) LTD, based in Boksburg, Gauteng. We provide recruitment, labour, HR and payroll-related services.

What we collect

Contact and identity details, CVs and work history, employment and payroll records, client details and website data.

Why we use it

To assess applications, provide our services, manage client relationships and meet our legal obligations.

Who we share it with

Clients, service providers, banks, SARS and other authorities, and advisers, only where needed.

How we protect it

Reasonable technical and organisational safeguards, confidentiality duties and breach notification as POPIA requires.

Your rights

Access, correct, delete, object, withdraw consent and complain to the Information Regulator.

Questions about your information?

Email info@work4ever.co.za | https://work4ever.co.za

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01 Introduction

WORK4EVER LABOUR SOLUTIONS (PTY) LTD ("Work4Ever", "we", "us" or "our") respects the privacy and protection of personal information.

This Privacy Policy explains how we collect, receive, use, store, disclose and otherwise process personal information in connection with our website, recruitment activities, labour solutions, human resource services, HR administration, payroll administration and related business operations.

We process personal information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA), its applicable regulations and other applicable South African laws.

This policy applies to website visitors, job applicants, candidates, employees whose information is handled through our services, clients, client representatives, suppliers, service providers and other individuals whose personal information we process.

02 Key definitions

The following terms are used in this policy with the meanings they have under POPIA:

- **Personal information:** information relating to an identifiable, living natural person and, where applicable, an identifiable, existing juristic person, such as a name, identity number, contact details, employment history or bank details.
- **Processing:** any operation or activity concerning personal information, including collecting, recording, storing, using, sharing, updating, deleting or destroying it.
- **Data subject:** the person to whom the personal information relates.
- **Responsible party:** the party that, alone or together with others, determines the purpose of and means for processing personal information.
- **Operator:** a party that processes personal information on behalf of a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.
- **Information Regulator:** the independent statutory body established under POPIA to monitor and enforce compliance with POPIA and the Promotion of Access to Information Act 2 of 2000 (PAIA).
- **Information Officer:** the person responsible for encouraging and overseeing an organisation's compliance with POPIA.

03 The parties and their responsibilities

The role Work4Ever performs depends on the purpose and circumstances of the processing.

- **Responsible party:** Work4Ever acts as a responsible party when it determines the purpose and means of processing personal information for its own business activities, including its recruitment records, website enquiries, client relationships and business administration.
- **Operator:** Where Work4Ever processes personal information on behalf of a client and in accordance with that client's instructions, Work4Ever may act as an operator under POPIA. In those

circumstances, the client will generally remain the responsible party for that processing.

The parties' actual responsibilities must be determined by the relevant facts and agreements, not merely by the labels used in a contract.

Where Work4Ever acts as an operator, it will process the information only within the authority and instructions given by the responsible party, subject to applicable law and the relevant written agreement.

04 Our commitment to the eight conditions for lawful processing

POPIA sets out eight conditions that every responsible party must meet. They guide everything we do with personal information:

1 Accountability

We take responsibility for making sure the conditions are met.

2 Processing limitation

Processing is lawful, reasonable, minimal and justified.

3 Purpose specification

Information is collected for specific, explicit and lawful purposes.

4 Further processing limitation

Further use must be compatible with the original purpose.

5 Information quality

Information is kept complete, accurate and up to date.

6 Openness

We tell you what we collect and why, including through this policy.

7 Security safeguards

Information is protected against loss, damage and unauthorised access.

8 Data subject participation

You can access, correct and request deletion of your information.

05 Personal information we may collect

Depending on the service or interaction, the information we process may include:

5.1 Identification and contact information

- Full names and surnames.
- Identity or other identification numbers.
- Contact numbers and email addresses.
- Residential or postal addresses.
- Proof of residence and other verification documents.

5.2 Recruitment and candidate information

- Curriculum vitae and employment history.
- Education, qualifications, skills and work experience.
- References and information supplied during an application.
- Right-to-work or other legally required verification information.
- Criminal-record or background-check information, where lawful, necessary and appropriately authorised.

5.3 Employment and payroll information

- Employment contracts and employment dates.
- Job titles, departments and remuneration details.
- Attendance, working hours, leave and overtime records.
- Bank account details required for salary payments.
- Tax, UIF and other statutory payroll information.
- Deductions and other payroll-related records.
- Supporting documents reasonably required for employment administration or payroll processing.

5.4 Client and supplier information

- Names and contact details of representatives.
- Business and billing information.
- Service agreements, correspondence and records relating to services provided.

5.5 Website and electronic information

Depending on the website's actual configuration, we may process information submitted through contact forms, application forms, email links or other website features. Technical information such as IP addresses, device details, browser information and website usage data may also be processed where collected by the website or its service providers.

5.6 Voluntary or mandatory information

Providing personal information to us is generally voluntary. However, some information is required so that we can assess an application, provide recruitment, HR or payroll services, or comply with employment, tax and other legal obligations. Where information is required by law or is necessary for a service, we will tell you. If it is not provided, we may be unable to assess an application or provide the relevant service.

We aim to collect only information that is adequate, relevant and not excessive for the purpose for which it is required.

06 How we collect personal information

We may collect personal information:

- Directly from the individual concerned.
- When a person applies for an advertised vacancy or submits a CV.
- Through forms, emails, telephone calls or other communication channels.
- From a client or an authorised representative who supplies information for employment, HR or payroll administration.
- From references, verification providers or other third parties where lawful and appropriate.
- Automatically through website technologies, where these are implemented and applicable.

Where information is obtained from another source, we will take reasonable steps to comply with applicable transparency requirements, including informing the individual where required by POPIA, subject to lawful exceptions.

07 Purposes and lawful grounds for processing

We process personal information only where a lawful justification under POPIA applies. Depending on the circumstances, this may include consent, contractual necessity, compliance with a legal obligation, protection of a legitimate interest of the data subject, or the legitimate interests of Work4Ever or another party recognised by POPIA.

We may process personal information for the following purposes:

- Receiving, assessing and managing job applications.
- Communicating with candidates and clients.
- Verifying qualifications, references and other relevant application information where lawful.
- Providing labour, recruitment, HR administration and payroll-related services.
- Maintaining employee and payroll records on behalf of clients where authorised.
- Processing attendance, remuneration, deductions and statutory payroll information within the agreed service scope.
- Managing client accounts, service agreements, invoices and business records.

- Responding to enquiries, complaints and requests.
- Meeting applicable legal, regulatory, tax, employment and record-keeping obligations.
- Protecting our business, systems, staff, clients and service users.
- Establishing, exercising or defending legal rights and claims.

Where processing is based on consent, the individual may withdraw that consent at any time. Withdrawal does not affect processing that took place lawfully before withdrawal, and it does not prevent processing that may continue on another lawful ground.

08 Special personal information

Certain information, including information about health, biometric information, religious or philosophical beliefs, race, political persuasion, trade-union membership, sex life and criminal behaviour, receives additional protection under POPIA.

Work4Ever will process special personal information only where an applicable authorisation or exception under POPIA permits it, and only where the processing is necessary and appropriately protected. Examples may include health information needed to assess fitness for work or to meet occupational health and safety obligations, or demographic information required for statutory reporting such as under the Employment Equity Act, where the law permits.

We will not request or use special personal information merely because it may be convenient. Where such information is required for a lawful employment, recruitment, verification or service-related purpose, the processing must be appropriately justified.

09 Use and further processing

Personal information will be used for the purpose for which it was collected or for a compatible purpose permitted by POPIA.

We will not use personal information for an unrelated purpose unless the further processing is permitted by law, is compatible with the original purpose, or another lawful justification applies.

10 Accuracy and quality of information

We take reasonable steps to ensure that personal information is complete, accurate, not misleading and updated where necessary, having regard to the purpose for which it is processed.

Individuals can help us by keeping their details up to date and by telling us when information we hold about them is incorrect. Requests for correction can be made as described in the section on exercising your rights.

11 Automated decision-making

Work4Ever does not make decisions that result in legal consequences for a person, or that substantially affect them, based solely on the automated processing of personal information, except where section 71 of POPIA permits it. Where such a decision is permitted, we will apply appropriate safeguards, including giving the person an opportunity to make representations about the decision.

12 Disclosure and sharing of personal information

Depending on the purpose and service, Work4Ever may share relevant personal information with:

- The client or employer for whom recruitment, HR or payroll services are being provided.
- Authorised payroll, HR, software, hosting, communication and IT service providers.
- Banks or payment service providers where necessary for an authorised payment process.
- SARS, the Department of Employment and Labour, the Information Regulator or another competent authority where legally required or permitted.
- Professional advisers, auditors or legal representatives where reasonably necessary.
- Other recipients where the individual has authorised the disclosure or another lawful ground applies.

We will limit disclosures to information reasonably necessary for the relevant purpose.

Where a third party processes personal information on our behalf, the applicable arrangements must provide for appropriate confidentiality and security safeguards. Where Work4Ever acts as an operator, it will comply with its duties under POPIA and the applicable written agreement.

13 Operators and service providers

Where Work4Ever appoints an operator to process personal information on its behalf, Work4Ever will take reasonable steps to ensure that the operator is bound by a written agreement requiring appropriate security measures as contemplated in section 21 of POPIA.

An operator must:

- Process personal information only with the responsible party's knowledge or authorisation and in accordance with its instructions.
- Treat personal information as confidential.
- Maintain appropriate security safeguards.
- Notify the responsible party immediately where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person.

14 Information security

Work4Ever is required to take appropriate, reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised destruction, unlawful access and unlawful processing.

The safeguards required will depend on the nature of the information, the risks involved and the circumstances of processing. They may include access restrictions, confidentiality obligations, secure handling and transfer procedures, appropriate system controls, backups and staff awareness measures.

No method of electronic transmission or storage can be guaranteed to be completely secure. Individuals should take care when sending personal information electronically and should contact us if they suspect that their information has been compromised.

15 Security compromises and data breaches

If Work4Ever becomes aware of a security compromise involving personal information:

- Where Work4Ever acts as an operator, it will notify the responsible party immediately when there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person.
- Where Work4Ever acts as the responsible party, it will notify the Information Regulator and affected data subjects as soon as reasonably possible, as required by section 22 of POPIA.
- Notifications will be made in accordance with applicable legal requirements, including any lawful direction or permitted delay relating to a criminal investigation.
- Work4Ever will take reasonable steps to contain the incident, assess its impact and reduce the risk of further harm.

A notification will include information required by law and, where reasonably possible, information that helps affected individuals take steps to protect themselves.

16 Retention and destruction of personal information

Work4Ever will not retain personal information for longer than is necessary to fulfil the purpose for which it was collected or processed, unless retention is required or authorised by law, a contract, or another lawful ground under POPIA.

Retention periods may differ depending on the type of record, the service provided, applicable employment and tax requirements, contractual obligations and the need to establish or defend legal claims. The table below is a general guide.

RECORD TYPE	GENERAL RETENTION GUIDE
Employment and payroll records	At least 3 years from the date of the last entry, as required by the Basic Conditions of Employment Act.
Tax records	5 years, as required by the Tax Administration Act.
Company and corporate records	7 years, as required by the Companies Act.
Other statutory records (such as UIF and compensation for occupational injuries)	As required by the relevant Act.
Candidate and CV records	No longer than needed for recruitment purposes, in line with our retention schedule, or until deletion is requested, unless the law requires us to keep them.
Client contracts and correspondence	For the duration of the agreement and for the period needed to establish or defend legal claims.
Website enquiries	For as long as needed to respond to and follow up on the enquiry.

When personal information is no longer lawfully required, it will be deleted, destroyed or de-identified in a manner that prevents reconstruction in an intelligible form, subject to applicable legal requirements.

Where Work4Ever processes client information as an operator, the retention, return or destruction of that information will also be governed by the client's lawful instructions and the relevant service agreement.

17 Cross-border transfers

Work4Ever will not transfer personal information to a third party in a foreign country unless the requirements of section 72 of POPIA are met.

Where a service provider stores or accesses personal information outside South Africa, Work4Ever will assess the arrangement and ensure that an applicable lawful basis and appropriate protection are in place before the transfer takes place.

18 Cookies and website technologies

The Work4Ever website may use cookies or similar technologies where these are implemented. These technologies may support website functionality, security, preferences, analytics or other disclosed purposes.

Where required, visitors will be provided with appropriate information and choices regarding non-essential cookies or similar technologies.

Visitors can also manage cookies through their browser settings. Disabling certain cookies may affect website functionality.

19 Direct marketing

Work4Ever will process personal information for direct marketing in accordance with POPIA, including section 69 and the applicable regulations.

Where unsolicited electronic direct marketing requires consent, Work4Ever will obtain the required consent in the prescribed manner before sending such communications. Where the existing-customer exception applies, Work4Ever will comply with all applicable statutory conditions, including the requirement that the marketing relates to its own similar products or services and that a reasonable, free and accessible opportunity to object is provided.

Every electronic direct-marketing communication will identify the sender and provide contact details through which the recipient can request that further marketing communications stop.

A recipient may object to direct marketing at any time. Work4Ever will respect and action valid objections in accordance with applicable law.

20 Data subject rights

Subject to POPIA and other applicable laws, individuals may have the right to:

- Be notified that their personal information is being collected or has been accessed by an unauthorised person.
- Request confirmation of whether Work4Ever holds their personal information.
- Request access to personal information held about them, subject to lawful limitations and applicable access procedures.
- Request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- Request the destruction or deletion of information that Work4Ever is no longer authorised to retain.
- Object to certain processing activities on grounds permitted by POPIA.
- Object to processing for direct marketing.
- Withdraw consent where processing is based on consent.
- Lodge a complaint with the Information Regulator.
- Exercise any other rights available under applicable law.

21 How to exercise your rights

Requests may be submitted to info@work4ever.co.za. Please follow these steps:

1	**Send your request** to info@work4ever.co.za and say what you are asking for, such as access, correction, deletion or objection.
2	**Verify your identity.** We may ask for reasonable information to confirm the identity and authority of the person making the request.
3	**Use the prescribed form where it applies.** Some requests must be made on a form prescribed under POPIA (see the table below).
4	**We respond.** We will respond within a reasonable time and within any period set by law. We will tell you if a lawful limitation prevents us from fully granting a request.

Where a prescribed form applies, it is available from the Information Regulator's website:

FORM	PURPOSE
POPIA Form 1	Objection to the processing of personal information.
POPIA Form 2	Request for correction or deletion of personal information, or for the destruction or deletion of a record.
POPIA Form 5	Complaint to the Information Regulator regarding interference with the protection of personal information.

Forms are available at https://inforegulator.org.za

Requests will be handled in accordance with POPIA, its regulations and any applicable lawful limitations. Requests for access to records may also be made under PAIA, which sets its own procedures and response periods.

22 Children's personal information

Work4Ever does not intentionally seek to collect children's personal information unless the collection and processing are lawful and an applicable authorisation under POPIA is present.

Where personal information relates to a child, Work4Ever will apply the additional protections required by POPIA and will obtain consent from a competent person where required by law.

23 Information Officer and privacy enquiries

Work4Ever will designate and register an Information Officer with the Information Regulator as required by POPIA.

The Information Officer's duties include encouraging and overseeing compliance, dealing with requests made under POPIA, and cooperating with the Information Regulator where required.

Privacy-related enquiries, requests and objections may be directed to:

WORK4EVER LABOUR SOLUTIONS (PTY) LTD

Email: info@work4ever.co.za

Website: https://work4ever.co.za

Location: Boksburg, Gauteng, South Africa

The Information Officer must perform the relevant statutory duties in accordance with POPIA, including the applicable registration requirements.

Information about accessing records under PAIA, including our PAIA Manual where applicable, can be requested from the privacy contact above.

24 Complaints to the Information Regulator

If an individual believes that their personal information has been processed unlawfully or that their rights under POPIA have been infringed, they may first contact Work4Ever using the privacy contact details above so that we can try to resolve the matter.

An individual also has the right to lodge a complaint with the Information Regulator (South Africa).

Information Regulator (South Africa)

Website: https://inforegulator.org.za

Telephone: 010 023 5200

General enquiries: enquiries@inforegulator.org.za

POPIA complaints: POPIAComplaints@inforegulator.org.za (using the prescribed POPIA Form 5)

Contact details are published by the Regulator and may change. Please check the Regulator's website for current details.

25 Changes to this Privacy Policy

Work4Ever may update this Privacy Policy when its services, information-processing practices or applicable legal requirements change.

The latest version will be published on the Work4Ever website with its effective date. Where a change materially affects the processing of personal information, Work4Ever will provide any notice required by applicable law.

26 Applicable law

This Privacy Policy is governed by the laws of the Republic of South Africa, including the Protection of Personal Information Act 4 of 2013 and its applicable regulations.

WORK4EVER LABOUR SOLUTIONS (PTY) LTD

Privacy contact: info@work4ever.co.za | https://work4ever.co.za

This Privacy Policy is intended to explain Work4Ever's personal-information processing practices. It does not replace the company's internal POPIA compliance framework, operator agreements, PAIA Manual, security procedures or other legal obligations.