

This Privacy Policy covers information that Walker Phillip Enterprises PTY LTD collects from users and visitors of Walker Phillip and related services. Walker Phillip respects your right to privacy and is committed to protecting your privacy including securely handling your personal information. This privacy policy sets out details of the information that we may collect from you and how we may use that information.

By using the Services and agreeing to this Privacy Policy, you are consenting to the collection, use, disclosure and other handling of your information as described below.

The Controller of your personal data in South Africa is enforced by the Protection of Personal Information Act

(POPI).

## 1. Information we collect from you

When you visit our website, we may collect or ask you to provide certain information in a variety of ways. This information may include: Personal Information or represent any information that identifies you such as name, date of birth, ID number, email address and CV.

### Information Provided/Submitted by You

Contact details, such as name, address, email address and phone number;

CVs and transcripts

### Information We Get From Your Use of Our Services

#### Information from Third Parties

#### Automatically Collected Information

Cookies and similar technologies (i.e Google Analytics)

Devices (i.e. IP Address)

Logs

Location information

Online Analytics Providers (i.e. Google Analytics)

Advertising Technology Providers

Do Not Track Disclosure

## 2. How we use your personal information

Walker Phillip may use your Personal Information to:

- Create and manage your account when you register, use or purchase our service;
- Verify your identity and accessibility to our service;
- Provide you with technical and customer support;
- Communicate with you and manage your service participation;
- Evaluate and improve the quality of our products, services and websites;
- Provide you with a customized experience when you visit our website;
- Provide our service;

- Enforce our legal rights or comply with legal requirements; and
- Walker Phillip may combine personal information from one service with information, including personal information, from other services.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

### 3. What legal basis do we rely on to process your Personal Information?

#### Consent

When you receive our promotional material or when you link your Walker Phillip account to your Social Network account, you consent that your Personal Information will be processed by us and we rely on this consent. You have the right to withdraw consent at any time. We will stop to process data after consent is withdrawn, where consent is the only legal basis for processing.

When you fulfil a contract Walker Phillip will also process your Personal Information when we need to fulfil a contract with you.

#### Legitimate Interest

Walker Phillip also processes your data when it is in our legitimate interests to do this and when these interests are not overridden by your data protection rights.

Our legitimate interests include:

- ensuring the security and integrity of our Services and in ensuring that our Websites and Apps operate effectively;
- selling and supplying goods and services to our customers;
- protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our products and services;
- sending promotional communications which are relevant and tailored to individual customers;
- understanding our customers' behavior, activities, preferences, and needs;
- improving existing products and services and developing new products and services;
- handling customer contacts, queries, complaints or disputes; and
- fulfilling our duties to our customers, colleagues, shareholders and other stakeholders.

The processing is necessary because of a legal obligation that applies:

Walker Phillip may process your data to comply with our legal and regulatory obligations such as preventing, investigating and detecting crime, fraud or anti-social behavior and prosecuting offenders, including working with law enforcement agencies. Your data may be processed in order to satisfy the applicable law or enforceable governmental request.

### 4. Your Rights

Whenever you use our services, we strive to provide you with access to your personal information that we process. Moreover, you can update it if they are not correct or to delete it or removed from our system – unless we are obliged to keep that information for legitimate business or legal purposes.

Moreover, you have additional rights such as to restrict the processing of your personal data in certain ways, to obtain a copy of your personal information in a commonly used electronic forms, to object to certain processing of your personal information by us including to opt out of any marketing communications that we may send you and to ask for your data to be made portable.

If you wish to exercise any of the above rights, please contact us using the contact details set out below. For the protection of your privacy and security, our Compliance team shall take every reasonable step to ensure that your identity is verified before granting access, or rectification, or deletion.

#### 5. Accessing and deleting your Personal Information

When you create an account and log-in to your 'My Account' area, it is protected by your password and may only be accessed by you. You can manage the content and information in your Account at any time, by logging in to your "My Account" area. You are responsible for keeping this password confidential. We ask you not to share this password with anyone.

You can deactivate or delete your account at any time, make your profile anonymous or choose to not make your profile searchable. To deactivate, please go to your "My Account".

However, if you would like to permanently delete your account, you can send an email to our Data Protection

Officer (DPO) (see below) with the subject line "Permanently delete my information and account". Please do not forget to tell us who you are.

#### 6. Who do we share your Personal Information with?

We do not share personal information with companies, organizations and individuals outside of Walker Phillip unless one of the following requirements is met:

With your consent - We will share personal information with clients of Walker Phillip, only if we have your consent to do so.

#### 7. Storage of Information and International Transfers

All Personal Information which you supply to us is generally stored and kept on the following platforms:

- Microsoft Office 365
- Vincere Recruitment Software (domiciled and servers in Singapore)

However, due to the nature of our global business and the technologies required, your Personal Information may be transferred to our approved third party service providers, subcontractors and partners outside countries where there may be a lower legal level of data protection.

Whilst we have used our best efforts to ensure the security of your information, please be aware that we cannot guarantee the security of information transmitted over the Internet.

#### 8. Managing your Personal Information

We retain your information as long as your account is active or as needed to provide your services or we have an ongoing legitimate business need to do so. We also retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements. We store your information as long as is necessary for the purpose for which we have collected it. When

we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if it is possible (e.g. your personal information is stored for backup archives) then will securely store your personal information and isolate it from any further processing until the deletion/erasure is possible.

#### 9. How we protect your personal information

Walker Phillip has taken appropriate technical and organizational measures to protect your data from misuse, unauthorized or unlawful access, alteration, loss, damage or destruction. These measures include:

- Physical safeguards with locked doors and file cabinets and controlled access to our facilities and secure destruction.
- Technology safeguards like use of anti-virus and protection software, data encryption and monitoring provided by our software suppliers.

#### 10. Third Party Links and Services

#### 11. Children and minors

The Walker Philip site is not directed to, nor do we knowingly collect information from, children under the age of eighteen (18).

#### 12. Contact Us

If you have any requests, questions, comments, or concerns regarding our Privacy Policy, please

Write to us:

Walker Phillip Enterprises (PTY) LTD

Brookside Office Park

11 Imam Haron Road

Claremont

7800

#### 13. Changes to this Policy

We may update or amend our Privacy Policy from time to time to comply with the law or to meet our changing business requirements. Please review the changes carefully. We will post any privacy policy changes on this page and, if the changes are significant, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

By continuing to access the Website and using the Services, your access and use will be subject to those updates and amendments.