



Recruitment & Candidate Privacy Notice

Policy

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1. Scope

Palabora Mining Company is a "responsible party", meaning that PMC are responsible for deciding how personal information is retained and used as well as to ensure compliance with data protection legislation. This privacy notice describes how PMC collect and use personal information during and after a recruitment process, in accordance with the requirements of section 18 of the Protection of Personal Information Act, 2013 ("POPIA").

2. Purpose

To describes the purpose for use and storage of candidate personal information in the context of PMC's recruitment activities by which an applicant provide personal information for a specific or range of PMC job opportunity/ties. The Notice applies to all job applicants who may be non-employees, employees, workers or contractors.

3. Consent to Process Personal Information

By submitting a job application to PMC, the applicant acknowledge and understand that he/she will be submitting personal information, including special personal information (collectively referred to as '**Personal Information**' hereafter, where applicable) to PMC.

The applicant voluntarily provide PMC with consent to the processing of Information as set out below.

The Applicant consent and authorise PMC or its duly authorised agent:

- To record and keep personal information supplied by the applicant for as long as it is required by and processed by PMC for its legitimate interests, subject to the provisions of applicable data protection legislation.
- To process special personal information. Special personal information include but not limited to results of psychometric tests, biometric information (such as photos, images and fingerprints) received *inter alia* by mail, hand delivered document, email, CCTV camera footage, access points in respect of any and all premises of PMC for purposes of *inter alia* identification and criminal checks, as PMC in its sole discretion deems necessary.
- To conduct any employment screening tests on me, including but not limited to, psychometric and other assessment tests, as PMC in its sole discretion deems necessary.
- To conduct social media scans, which may involve the processing of my personal information, as PMC in its sole discretion deems necessary.
- To contact any of my references and to make enquiries in respect of my behaviour, work ethic, competence, expertise, work record, honesty and any related matters as PMC in its sole discretion deems necessary.

- To verify any and all of my qualifications against any source as PMC in its sole discretion deems necessary.
- To make my name, surname, identity number and fingerprints available to the police services and/or any credit bureau and I hereby authorise PMC to conduct any credit references and/or to conduct a criminal record enquiry as PMC in its sole discretion deems necessary.
- To share my Personal Information, including the information contained in my CV, and/or information procured during the application process including *inter alia* during the interviews held with me, with third parties, where it is in the legitimate interests of PMC or such third parties to do so, including but not limited to recruitment agencies, verification agencies, and training facilities.
- I hereby consent and authorise such third parties to process my Personal Information for reasons that are related to the legitimate interests of PMC or such third parties. I understand that my Personal Information will be treated confidentially by PMC and/or its duly authorised agent and/or third parties, and will only be shared for the purposes set out in this paragraph.
- To transfer my Personal Information to countries outside South Africa for recruitment purposes, including *inter alia* travelling, visa processing, and storage purposes.
- To process my personal information and special personal information for the purposes of preventing and mitigating the spread of COVID-19 in the workplace in compliance with the applicable laws, including but not limited to, screening results from measures implemented in order to screen for COVID-19, information required for the purposes of contact tracing if required, as well as any COVID-19 related medical results required for *inter alia* conducting risk assessments, contact tracing, sick leave claims, and complying with any reporting and/or legal obligations.
- To process my personal information and special personal information for the purposes of preventing and mitigating the spread of any communicable disease which may be declared a pandemic in the workplace in compliance with the applicable laws, including but not limited to, screening results from measures implemented in order to screen for the communicable disease, information required for the purposes of contact tracing if required, as well as any related medical results required for *inter alia* conducting risk assessments, contact tracing, sick leave claims, and complying with any reporting and/or legal obligations.
- To process my personal information and special personal information for the purposes of complying with the applicable laws and implementing any measures within the workplace as may be required in the event that a national state of disaster is declared within South Africa.

The Applicant consent and authorise the Police Services:

- To furnish personal information regarding my criminal background, criminal history, previous convictions and/or any other relevant information, if any, which personal information the police services would usually furnish in this regard, to PMC and/or PMC's duly authorised agent.
- The Applicant furthermore unconditionally indemnify the police services and all its members, employees as well as the Government against any liability which results or may result from furnishing information in this regard.

The Applicant understand that:

- the information is sought and will be furnished solely for the purpose of prospective employment with PMC;
- any information furnished to PMC/PMC's duly authorised agent by the police services, will be disclosed to you by PMC/PMC's duly authorised agent upon your request; and
- PMC/PMC's duly authorised agent will be entitled to rely on the accuracy of the information furnished by the police services. The police services will be responsible for ensuring that the information is accurate in every respect.
- The applicant agree to give honest, accurate and current Personal Information to PMC and to maintain and update such information when necessary and indemnify PMC for any harm, loss or damages you may incur due to PMC's reliance on incorrect information relating to you.

Access to, correction and deletion of your Personal Information

- You may request details of the Personal Information held about you under the Protection of Personal Information Act, 2013 ("**POPIA**").
- Fees to obtain a copy or a description of Personal Information held about you are prescribed in terms of the Promotion of Access to Information Act, 2000 ("**PAIA**").
- Confirmation of whether or not we hold Personal Information about you may be requested free of charge. If you would like to obtain a copy of your Personal Information held by PMC, please review the PMC PAIA Manual on the PMCWeb.
- You may request the correction of personal information PMC holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, PMC will be indemnified from any harm, loss or damages you may incur.
- You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.

- You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

4. Collection of Personal Information

PMC collect personal information about employees and contractors through the application and recruitment process, directly from either candidates, employment agency or background/qualification check provider. PMC may sometimes collect additional information from third parties, including former employers, credit reference agencies or bureaus or other background check agencies.

5. Utilisation of Information

PMC will use candidate Personal Information during the recruitment process, as allowed by law in the following circumstances:

- Making a decision about recruitment or appointment.
- Making travel arrangements and accommodation bookings for non-local candidates required to attend onsite interviews.
- Confirming legal status for employment in South Africa.
- Confirm validity of qualification and licenses.
- Obtain fingerprints to confirm criminal record (past & present) in line with the job opportunity applied for.
- Ascertain employee/contractor fitness to work.
- Employment equity management and monitoring.
- In some cases banking details may be requested to reimburse candidate travel expenses.
- Screening results from measures implemented in order to screen for COVID-19, as well as any COVID-19 related medical results required for inter alia conducting risk assessments, contact tracing, sick leave claims, and complying with any reporting and/or legal obligations; and
- PMC will use information regarding physical health for the purposes of preventing and mitigating the spread of COVID-19, or any other communicable disease declared to be a pandemic by the Government, in the workplace in accordance with applicable laws.

- Change of purpose:

The use of Personal information will only be for the purposes for which collected, unless a need arise to use it for another reason and that reason is compatible with the original purpose. Candidates will be notified if a need arise for the use of personal information for an unrelated purpose and the legal basis that allows PMC to do so, will be explained.

Note that PMC may process personal information without the knowledge or consent of employees, in compliance with the above rules as required or permitted by law.

6. Automated Decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. PMC are currently not making use of such a recruitment system but will notify employees in writing if this position changes.

7. Personal Information Sharing

PMC may have to share personal information with third parties, including third-party service providers, whom will respect the security of personal information and treat it in accordance with the law.

PMC are required to share personal information with third parties as required by law, where it is necessary to administer the working relationship with employees or where PMC have another legitimate interest in doing.

8. Data Security

PMC have put in place measures to protect the security of information. Details of these measures are available in our PMC PAIA manual which aims to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, PMC limit access to personal information to those employees, agents, contractors and other third parties who have a business need to know.

Where legally required PMC has implemented procedures to deal with any suspected data security breach and to communicate such breach to the affected employees and any applicable regulator.

9. Data Retention Periods

PMC will only retain personal information for as long as necessary to fulfil the purposes PMC collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Applicants who voluntary submit their CVs containing personal information, consent to the use of their personal information for recruitment processes as outlined in this notice and documents of those who are not successful during the recruitment process, will only be kept for a period of 12 months.

Personal Information of Successful applicants and employed by PMC will be processed and kept safe as per the PMC Document/Record Retention and Disposal Policy (POPIA-ODT-POL-002).

10. Information Officer (IO) or Deputy IO

PMC have appointed an Information Officer to oversee compliance with this privacy notice. Any questions regarding the Privacy Notice or how PMC handle personal information should be directed to the Information Officer. You have the right to make a complaint at any time to the Information Regulator.

IO and Deputy IO contact details:

Mr. Dennis Modise

1 Copper Road, Phalaborwa, 1389

P O Box 65, Phalaborwa, 1390

Dennis.modise@palabora.co.za

(015) 780 2196

Mr. H.K. Ntimane

1 Copper Road, Phalaborwa, 1389

P O Box 65, Phalaborwa, 1390

Kevin.ntimane@palabora.co.za

(015) 780 3061

11. Policy revision

This policy has been reviewed and approved by the IO, and is subject to change without prior notice.

12. Changes

PMC reserve the right to update this privacy notice at any time, and PMC will provide employees with a new privacy notice when PMC make any substantial updates. PMC may also notify employees in other ways from time to time about the processing of personal information.

Table 1: Table of changes

Custodian:	Manager HR Support and Services	
Review Team:	Manager Human Resources Services Manager Risk and Assurance Recruitment Superintendent Human Resources REM & SAP Specialist	
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