

# PRIVACY NOTICE

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## WHO WE ARE

In this Notice, “Old Mutual”, “Old Mutual Group” or “we” refers to one or more of the companies in the Old Mutual Group that operate in South Africa. Old Mutual is the responsible party for this information unless this notice specifically states otherwise.

### THE INFORMATION WE COLLECT, STORE AND USE

We collect, store and use the following categories of personal information about you:

- Personal contact details such as name, surname, title, addresses, telephone numbers and personal e-mail addresses
- Date of birth
- Nationality
- Gender
- Marital status
- ID Number and/or Passport Number
- Information pertaining to any disability you might have
- Copies of ID and/or Passport and marriage certificate (where applicable)
- Recruitment information including work permit documentation, references and other information included in a CV or cover letter which forms part of the recruitment process, like employment and education history including your qualifications, job application, employment references, right to work information and details of any criminal convictions that you declare)
- Previous employment details
- Previous salary/income history
- Credit and criminal record check information. This will include ongoing screening where this is required by law or by your position in the organization.

#### **We will also collect, store and use the following categories of Special Personal Information (SPI) as defined in POPIA:**

- Information about your race/ethnicity
- Information about alleged criminal convictions/allegations and offences

The type of information we collect will depend on the purpose(s) for which it is collected and used. We will only collect information that we need for a specific purpose.

We will only use or disclose personal information concerning your race or ethnic origin and criminal behaviour provided to us with your consent or in limited lawful circumstances provided for in POPIA.

Where the information we process is special personal information, the additional bases for processing that we rely on are:

#### **Race information:**

- **Section 29:** which relates to processing that is necessary to identify data subjects and only when this is essential for that purpose; and to comply with laws and other measures designed to protect or advance persons, or categories of persons, disadvantaged by unfair discrimination.

#### **Criminal behaviour and biometric information**

We process information about alleged criminal convictions and offences of applicants. The lawful basis we rely on to process this data are:

- **Section 33:** for reasons related to legal obligation and where such information has been obtained in accordance with the law, in accordance with the law, in accordance with labour legislation and/or any other permissible reason under section 33



### HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect personal information about job applicants through the application and recruitment process, either directly from you or, in some cases, from an employment agency, assessment provider, or background and vetting service provider engaged as part of the recruitment process. We may also collect additional information from third-party sources including referees (such as former employers), assessment and psychometric service providers, social media platforms, credit reference agencies, public sources, and background or identity verification agencies. If you are a secondee, we will collect relevant information from your current employer. Where possible, we will inform you which information is mandatory to provide and which information is optional.

We may also supplement the information that you provide to us with information we receive from other companies in the Old Mutual Group to ensure accurate and updated employee records or for any purposes provided for in this Privacy Notice.

We have a duty to take all reasonably practicable steps to ensure your personal information is complete, accurate, not misleading and updated on a regular basis. To enable this, we will always try to obtain personal information from you directly, and we require of you in accordance with the principle of data subject participation to keep your personal information up to date and accurate. Where we are unable to do obtain personal information from you directly, we will make use of verifiable independent third-party data sources that agree to adhere to similar privacy and confidentiality protocols that Old Mutual adhere to.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information. This includes information about how you logged on and from our website, including your IP address, information about your visit, your device information and how you use our website. This will include the capture of your approximate location information - please see the Cookie Policy on our website for further information on this.

### LAWFUL BASIS FOR PROCESSING

Depending on the processing activity, we rely on the following lawful basis for processing your personal information under POPIA:

- Section 11(1)(b) which relates to processing necessary for the performance of a contract
- Section 11(1)(c) so we can comply with our legal obligations as your employer
- Section 11(1)(d) in order to protect your legitimate interests.



## USE OF OUR RECRUITMENT PLATFORM

When applying for a role with Old Mutual, you will be required to use our recruitment platform to submit your application. To ensure accuracy and avoid duplication, we encourage candidates to create and maintain a single candidate profile and to keep their information up to date.

Our recruitment platform also provides the option to set up job alerts, which notify you when roles become available that match your interests and the preferences you select. Job alert notifications are generated based on the criteria you configure, such as job type, location, or area of expertise.

Please note that you are responsible for managing your job alert settings, including setting them up, modifying them, or disabling them if you no longer wish to receive notifications. You can update or remove job alerts at any time by logging into your candidate profile.

Old Mutual cannot be held responsible where job alert notifications are sent as a result of job alert preferences that you have set and have not updated or removed, including instances where you no longer wish to receive such notifications. Similarly, Old Mutual cannot be held responsible for missed opportunities where job alerts have not been set up or maintained by the candidate.

are matched to one of these sanctions lists.

You agree that we may process personal information about your creditworthiness, credit history, financial history, legal judgments, default history, risk analysis, tracing and debt recovery and where applicable share it with any credit bureau, association or industry.

You agree that we may process your personal information (including combining of unique identifiers) for purposes of market, statistical and academic research, cross company analytics, and carrying out surveys to better our employee experience. Should we be required to share the results of the analytical work we undertake with third parties, we will depersonalise the information to the extent possible.



## TO WHOM WE DISCLOSE YOUR INFORMATION

We may disclose your personal information to our authorised service providers who support the recruitment and employment application process on our behalf. This includes, where applicable, employment agencies, assessment and psychometric service providers, background screening, identity verification and vetting service providers, as well as other third parties involved in delivering recruitment-related services. We have agreements in place with these service providers to ensure that they process personal information securely and in accordance with this Privacy Notice and applicable data protection legislation

We will share your personal information with third parties if it is for purposes of credit reference checks or sharing with law enforcement agencies.

### We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes; or
- Where we believe it is necessary to protect our rights.

Should we become involved in any merger, acquisition or divestiture, we may share your personal information with third parties as it relates to this transaction. The new entity will have access to the information shared with them and will process your personal information in accordance with this Privacy Notice.



## THE PURPOSE FOR WHICH WE USE YOUR INFORMATION

We will use and process your personal information as part of the employment application process at Old Mutual for the following legitimate or employment related purposes:

- Employment administration and management such as administration of salary, pension and other employment related benefits, the administration of statutory and contractual leave entitlements such as holiday or maternity leave, development and training, performance appraisals, to conduct pay and grading reviews, disciplinary and grievance related processes and other general human resource related processes
- To provide you with access to business services required for your role
- To consider the application for employment
- Compliance with applicable legislation, legal requirements or industry codes applicable to the employer
- To confirm and verify your identity or to verify that you are an authorised user for security purposes
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- To conduct market research or for statistical analysis
- For audit and record keeping purposes
- In connection with legal proceedings

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law (for example to protect Old Mutual's interests).

We may also process your information, including personal and special personal information, to conduct sanction screening against all mandatory and non-mandatory sanctions lists, and we may communicate such personal information to local and international Regulatory Bodies as well as to other entities in the Old Mutual Group if you



## HOW WE SAFEGUARD YOUR INFORMATION

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

### Our Security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;

- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

### Automated decision making

You agree that we may process your personal information by using automated means (without human intervention in the decision-making process) to make a decision about you or your application for any product or service. We will make the necessary representations to your and you may query the decision made about you.



### USE OF ARTIFICIAL INTELLIGENCE AND AUTOMATED PROCESSING

We may use artificial intelligence, automated processing, analytics and other technology-enabled tools to support recruitment activities, including the administration and assessment of applications, comparison of candidate information against role requirements, identification of potentially suitable candidates, and the improvement of recruitment processes. The information considered may include details provided in an application, assessment results, qualifications, experience and other information relevant to the role. Where these tools generate recommendations, scores or insights that may materially influence a recruitment outcome, appropriate human oversight will be applied. We take reasonable steps to ensure that such processing is relevant, proportionate, appropriately tested and monitored, and does not result in unfair or discriminatory outcomes. Candidates may request further information about the role of automated processing in a decision affecting them and may raise concerns through the contact channels provided in this notice.



### CROSS BORDER TRANSFER OF INFORMATION

We may transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to, is subject to a law providing similar protection to the conditions set out in POPIA or with your prior permission. Examples of this may include but are not limited to:

- If personal information is shared with an email address that is hosted outside of South Africa; or
- We make use of cloud services, and the cloud is hosted outside of South Africa.



### YOUR RIGHTS

We will take all reasonable steps to confirm your identity when you exercise your rights.

#### Access to information

You have the right to request a copy of the personal information we hold about you. To do this, please complete the PAIA Form and email it to us at [PAIA@oldmutual.com](mailto:PAIA@oldmutual.com).

Please note that any such access request may be subject to a payment of a legally allowable fee and a turnaround time as defined in Old Mutual's PAIA Manual.

#### Objection to processing

In certain cases, you have the right to object to the processing of your personal information. If you want to object, send an email to:

[ExternalSP@workdayhelp.oldmutual.com](mailto:ExternalSP@workdayhelp.oldmutual.com)

#### Correction of your information

You have the right to update or correct your personal information. You may do this directly in the candidate profile or email

[ExternalSP@workdayhelp.oldmutual.com](mailto:ExternalSP@workdayhelp.oldmutual.com)

#### Deletion of your information

You agree that we may keep your personal information until we destroy your information based on Old Mutual's destruction standards. You have the right to ask for deletion or destruction of your personal information – we will do that unless the law requires us to keep it or if we need it for legitimate business purposes. You may delete your information directly in the candidate profile or email [ExternalSP@workdayhelp.oldmutual.com](mailto:ExternalSP@workdayhelp.oldmutual.com)



### CHANGES TO THIS NOTICE

Please note that we may unilaterally amend this Privacy Notice from time to time. Please visit the Old Mutual website (<https://www.oldmutual.com/careers/>) periodically to inform yourself of any changes.



### HOW TO CONTACT US

If you have questions about this Notice or believe we have not adhered to it or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, you agree to first attempt to resolve the concerns with us. Please contact us at: [ExternalSP@workdayhelp.oldmutual.com](mailto:ExternalSP@workdayhelp.oldmutual.com)



### INFORMATION REGULATOR

You have the right to complain to the Information Regulator, whose contact details are: <http://www.justice.gov.za/inforeg/index.html>

General enquiries: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

Complaints: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)