

General information

This policy refers to and summarises the processing of “Personal Data” being under GDPR and POPIA and, for purposes of this policy, comprises all data that can be used to personally identify you of the following entities:

1. True North Partners LLP
2. TNP Deutschland GmbH
3. True North Partners South Africa (Pty) Ltd

Although these businesses are separate with different clients and this policy caters for each. Each company has separate registrations and are independent “data controllers”. The processing of personal data by these companies is similar so the policy covers each company.

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit our website. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

The purpose of this section is to inform data subjects about how we process their personal data by, *inter alia*, collecting or collating, receiving, recording, storing, updating, distributing, erasing or destroying, disclosing and/or generally using the data subject’s personal data.

TNP, in its capacity as responsible party and/or operator (as these terms are defined by GDPR and POPIA), shall strive to observe, and comply with its obligations under GDPR and POPIA as well as accepted information protection principles, practices and guidelines when it processes personal data from or in respect of a data subject.

Please note that this policy does not apply to the information practices of third party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that TNP does not manage or employ. These third party sites may have their own privacy policies and terms and conditions and we encourage you to read them before using them.

Data recording on our website

Who is the responsible party for the recording of personal data on this website (i.e. the “controller” / “responsible party”)?

The personal data on this website is processed by the operator of the website, whose contact information is available under section “Information Required by Law” on this website.

How do we collect and record your personal data?

We generally collect personal data directly from data subjects, unless an exception is applicable (such as, for example, where the data subject has made the personal data public or the personal data is contained in or derived from a public record). We collect your personal data as a result of your sharing of your personal data with us. This may, for instance be information you enter into our contact form

Our IT systems automatically record other data when you visit our website. This data comprises primarily technical information (e.g. web browser, operating system or time the site was accessed). This information is recorded automatically when you access our website.

We will always collect personal data in a fair, lawful and reasonable manner to ensure that it protects the data subject's privacy and will process the personal data based on legitimate grounds in a manner that does not adversely affect the data subject in question.

Note: You are not obliged to provide your personal data to us.

Where we obtain personal data from third parties, we will strive to ensure that we obtain the consent of the data subject to do so or will only process the personal data without the data subject's consent where we have another basis to do so.

Client Work

We are a consultancy and we work with financial institutions. The personal data we process is the contact details (**Contact Data**) of the personnel of our clients.

Lawful processing of personal data

Where TNP is the Responsible Party, it will only process a data subject's personal data where:

- processing complies with an obligation imposed by law on TNP;
- processing protects a legitimate interest of the data subject; and/or
- processing is necessary for pursuing the legitimate interests of TNP or of a third party to whom the information is supplied. This maybe marketing to data subjects who have made contact with TNP or use of the Contact Data as TNP work with its clients.

TNP will only process personal data where one of the legal bases referred to above are present.

Storage and processing of personal data by us and third party service providers

TNP may store your personal information in electronic format using TNP's own secure on-site servers or other internally hosted technology. Your personal data may

also be stored by third parties, via cloud services or other technology, with whom TNP has contracted with, to support TNP's business operations.

TNP's third party service providers, including data storage and processing providers, may from time to time also have access to a data subject's personal data in connection with purposes for which the personal data was initially collected to be processed.

TNP will ensure that such third party service providers will process the personal data in accordance with the provisions of the policy set out in this policy and all other relevant internal policies and procedures, GDPR and POPIA.

Your personal data may be Processed in the where TNP, its affiliates and their third party service providers maintain servers and facilities and TNP will take steps, including by way of contracts, to ensure that it continues to be protected, regardless of its location, in a manner consistent with the standards of protection required under applicable law.

What are the purposes we use your data for?

We will only process a data subject's personal data for a specific, lawful and clear purpose (or for specific, lawful and clear purposes) and will ensure that we make the data subject aware of such purpose(s) as far as possible.

We will ensure that there is a legal basis for the processing of any personal data. Further, we will ensure that processing will relate only to the purpose for and of which the data subject has been made aware (and where relevant, consented to) and will not process any personal data for any other purpose(s).

We may use personal data for one or more of the following non-exhaustive purposes: (i) generally to make the our website and/or services available to you; (ii) a portion of the personal data is generated and processed in order to guarantee the error free provision of the website; (iii) to respond to any correspondence that the data subject may send to us including via our website(s); (iv) other personal data may be used to analyse your use patterns of our website. The processing of Contact Data is to enable us to communicate with our clients' personnel.

Personal data for direct marketing purposes

To the extent that we act in our capacity as a direct marketer, we strive to observe, and comply with its obligations under GDPR and POPIA when implementing principles and practices in relation to direct marketing. For purposes of this policy, (i) "direct marketing" means to approach a person, by electronic communication, for the purpose of promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; (ii) "direct marketer" means a supplier who employs Direct Marketing as an advertising mechanism.

TNP may use personal data to contact any data subject and/or market TNP's services directly to the data subject(s) if the data subject is one of TNP's existing clients, the data subject has requested to receive marketing material from TNP or (for

European data subjects) TNP believe that to market is in TNP's legitimate interest and with every communication the data subject has had the opportunity to "opt out".

TNP will ensure that a reasonable opportunity is given to the data subject to object to the use of their personal data for TNP's marketing purposes when collecting the personal data and on the occasion of each communication to the data subject for purposes of direct marketing.

TNP will not use your personal data to send you marketing materials if you have requested not to receive them. If you request that we stop processing your personal data for marketing purposes, TNP shall do so. We encourage that such requests to opt-out of marketing be made via forms and/or links provided for that purpose in the marketing materials sent to you.

Retention of personal data

We may keep records of the personal data we have collected, correspondence, or comments in an electronic format.

In terms of GDPR and POPIA, TNP may not retain personal data for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such a way that it cannot be reconstructed) or de-identify the information as soon as is reasonably practicable once the purpose has been achieved. This prohibition will not apply in the following circumstances:

- where the retention of the record is required or authorised by law;
- TNP requires the record to fulfil its lawful functions or activities;
- retention of the record is required by a contract between the parties thereto;
- the record is retained for historical, research or statistical purposes provided safeguards are put in place to prevent use for any other purpose.

Accordingly, TNP will, subject to the exceptions noted herein, retain personal data for as long as necessary to fulfil the purposes for which that personal data was collected and/or as permitted or required by applicable law.

Where we retain personal data for longer periods for statistical, historical or research purposes, TNP will ensure that appropriate safeguards have been put in place to ensure that all recorded personal data will continue to be processed in accordance with this policy and the applicable laws.

Safe-keeping of personal data

TNP shall preserve the security of personal data and, in particular, prevent its alteration, loss and damage, or access by non-authorised third parties.

TNP will ensure the security and integrity of personal data in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access and unauthorised destruction of personal data.

Breaches of personal data

A Data Breach refers to any incident in terms of which reasonable grounds exist to believe that the personal data of a data subject has been accessed or acquired by any unauthorised person.

TNP will address any data breach in accordance with the terms of GDPR and POPIA.

TNP will notify the Regulator and the affected data subject (unless the applicable law requires that we delay notification to the data subject) in writing in the event of a data breach (or a reasonable belief of a data breach) in respect of that data subject's personal data.

TNP will provide such notification as soon as reasonably possible after it has become aware of any data breach in respect of such data subject's personal data.

Provision of personal data to third party service providers

TNP may disclose personal data to third parties and will enter into written agreements with such third parties to ensure that they process any personal data in accordance with the provisions of this policy, GDPR and POPIA.

TNP will disclose personal data with the consent of the data subject or if TNP is permitted to do so without such consent in accordance with the applicable laws.

Further,

TNP may also send personal data to a foreign jurisdiction outside of the Republic of South Africa, including for processing and storage by third parties.

TNP may transfer personal data outside the European Economic Area or UK but will do so lawfully.

The data subject should also take note that the processing of personal data in a foreign jurisdiction may be subject to the laws of the country in which the personal data is held, and may be subject to disclosure to the governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

We will monitor and review the use by third party service providers of artificial intelligence. This will include ensuring that personal data is not retained by the third party service providers as training data.

We will use AI solutions that help us work efficiently. These solutions will be "closed" with TNP data not leaving our system. The TNP data will be processed by the AI solutions. In so doing TNP will respect the confidentiality of the data and the outputs will be reviewed so that the proprietorial rights are respected.

What rights do you have as far as your personal data is concerned?

POPIA, read with the relevant provisions of the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”), confers on natural persons and where applicable, juristic persons whose personal data is processed, certain rights. TNP’s PAIA manual can be requested anytime at hr.admin@tnp.eu. These rights are set out below.

Under GDPR and POPIA, you have the right to receive information about the source, recipients and purposes of your personal data as processed by us (including for archiving purposes) at any time without having to pay a fee for such disclosures. You also have the right to demand that your personal data is rectified, blocked or eradicated. Please do not hesitate to contact us at any time under the address disclosed in section “Information Required by Law” on this website if you have questions about this or any other data protection related issues. You also have the right to log a complaint with the Regulator or competent supervising agency under any other applicable legislation.

Moreover, under certain circumstances, you have the right to demand the restriction of the processing of your personal data. For details, please consult the Data Protection Declaration under section “Right to Restriction of Data Processing.”

Please also note that a data subject that has previously consented to the processing of his/her/its personal data has the right to withdraw his/her/its consent and may do so upon providing TNP with notice to such effect at the address set out in Section 1 (Legal Notices) hereto. Furthermore, a data subject may object, on reasonable grounds, to the processing of relating to him/her/it.

We will respond to each written request of a data subject not later than 30 (thirty) days after receipt of such requests. Under certain circumstances, TNP may, however, extend the original period of 30 days once for a further period of not more than 30 (thirty) days.

A data subject has the right to make a complaint to TNP in respect of this time limit by contacting TNP using the contact details provided in this policy.

The prescribed fees to be paid for copies of the data subject’s personal data are listed in the PAIA Manual.

Analysis tools and tools provided by third parties

There is a possibility that your browsing patterns will be statistically analysed when your visit our website. Such analyses are performed primarily with cookies and with what we refer to as analysis programmes. As a rule, the analyses of your browsing patterns are conducted anonymously; i.e. the browsing patterns cannot be traced back to you.

You have the option to object to such analyses or you can prevent their performance by not using certain tools. For detailed information about the tools and about your options to object, please consult our Data Protection Declaration below.

General information and mandatory information

Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal data will be collected. This Data Protection Declaration explains which personal data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you and you acknowledge that the transmission of personal data via the Internet (i.e. through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third party access.

Information about the responsible party (referred to as the “controller” in the GDPR)

The joint data processing controllers on this website are:

True North Partners LLP
20-22 Wenlock Road
London N1 7GU
+44 207 193 7392

TNP Deutschland GmbH
Neue Mainzer Str. 66-68, c/o Mindspace Germany GmbH
60311 Frankfurt am Main
+49 69 274015 809

True North Partners South Africa (Pty) Ltd
106 Johan Ave
Dennehof Sandton 2196 Johannesburg
+27 11 083 8372

E-mail: info@tnp.eu

The responsible party / controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g. names, e-mail addresses, etc.).

Revocation of your consent to the processing of your personal data

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. To do so, all you are required to do is send us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any personal data collection or

processing that occurred prior to your revocation. Furthermore, under POPIA, should any other basis for processing of your personal data apply, we will continue processing your personal data under that basis.

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR and Section 5 (1) (d) of POPIA)

In the event that personal data are processed on the basis of Article 6 (1) (e) or (f) GDPR or Section 11(1)(e) - (f), you have the right to at any time object to the processing of your personal data based on grounds arising from your unique situation. This also applies to any profiling based on these provisions. To determine the legal basis, on which any processing of data is based, please consult this Data Protection Declaration. If you log an objection, we will no longer process your affected personal data, unless we are in a position to present compelling protection worthy grounds for the processing of your data, that outweigh your interests, rights and freedoms or if the purpose of the processing is the claiming, exercising or defence of legal entitlements (objection pursuant to Article 21 (1) of the GDPR and Section and Section 5 (1) (d) of POPIA).

If your personal data is being processed in order to engage in direct advertising, you have the right to at any time object to the processing of your affected personal data for the purposes of such advertising. This also applies to profiling to the extent that it is affiliated with such direct advertising. If you object, your personal data will subsequently no longer be used for direct advertising purposes (objection pursuant to Article (21) (2) GDPR and Section 5 (1) (e) of POPIA). Right to log a complaint with the Regulator or competent supervisory agency under the GDPR.

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency , in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

Right to data portability

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption programme. You can recognise an encrypted connection by checking whether the address line of the browser switches from “<http://>” to “<https://>” and also by the appearance of the lock icon in the browser line.

If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

Information about, blockage, rectification and eradication of personal data

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your personal data rectified, blocked or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time at the address provided in section "Information Required by Law."

Right to demand processing restrictions

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time at the address provided in section "Information Required by Law." The right to demand restriction of processing applies in the following cases:

In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.

If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.

If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.

If you have raised an objection pursuant to Article 21 (1) GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data - with the exception of their archiving - may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

Rejection of unsolicited e-mails

We herewith object to the use of contact information published in conjunction with the mandatory information to be provided in section "Information Required by Law" to send us promotional and information material that we have not expressly requested. The operators of this website and its pages reserve the express right to

take legal action in the event of the unsolicited sending of promotional information, for instance via SPAM messages.

Recording of data on our website

Cookies

In some instances, our website and its pages use so-called cookies, which are small text files sent by a web server to store on a web browser. Cookies do not cause any damage to your computer and do not contain viruses. The purpose of cookies is to make our website function properly, more user friendly, effective and more secure. Cookies are small text files that are placed on your computer and stored by your browser.

Most of the cookies we use are so-called “session cookies.” They are automatically deleted after you leave our site. Other cookies will remain archived on your device until you delete them. These cookies enable us to recognise your browser the next time you visit our website.

You can adjust the settings of your browser to make sure that you are notified every time cookies are placed and to enable you to accept cookies only in specific cases or to exclude the acceptance of cookies for specific situations or in general and to activate the automatic deletion of cookies when you close your browser. If you deactivate cookies, you acknowledge that the functions of this website may be limited. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the website. If you accept a “cookie” or fail to deny the use of “cookies”, you agree that we may use your personal data collected using “cookies” (subject to the provisions of this policy).

Cookies that are required for the performance of the electronic communications transaction or to provide certain functions you want to use (e.g. the shopping cart function), are stored on the basis of Section 11(1)(f) of POPIA or Article 6 (1) (f) of the GDPR. The website operator has a legitimate interest in storing cookies to ensure the technically error free and optimised provision of the operator’s services. If other cookies (e.g. cookies for the analysis of your browsing patterns) should be stored, they are addressed separately in this Data Protection Declaration.

Server log files

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

The type and version of browser used

The used operating system

Referrer URL

The hostname of the accessing computer

The time of the server inquiry

The IP address

This data is not merged with other data sources.

This data is recorded on the basis of Section 11(1)(f) of POPIA or Article 6 (1) (f) of the GDPR. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

Request by e-mail, telephone or fax

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent or other applicable legal basis.

The processing of these data is based on Section 11(1)(b) of POPIA or Art. 6 (1) (f) of the GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases, the processing is based on your consent (Section 11(1)(a) of POPIA or Article 6 (1) (a) of the GDPR) and/or on our legitimate interests (Section 11(1)(f) of POPIA or Article 6 (1) (f) of the GDPR), since we have a legitimate interest in the effective processing of requests addressed to us.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular, statutory retention periods - remain unaffected.

Analysis tools and advertising

Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics uses so-called cookies. The information generated by cookies on your use of this website is usually transferred to a Google server in the United States, where it is stored. You hereby consent to us transferring the information generated by cookies on your use of this website to a Google server in the United States.

The storage of Google Analytics cookies and the utilisation of this analysis tool are based on Article 6 (1) (f) of the GDPR. The operator of this website has a legitimate interest in the analysis of user patterns to optimise both, the services offered online and the operator's advertising activities.

IP anonymization

On this website, we have activated the IP anonymisation function. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP address will be transmitted to one of Google's servers in the United States and abbreviated there only in exceptional cases. You hereby consent to us transferring your full IP address to a Google server in the United States. On behalf of the operator of this website, Google shall use this information to analyse your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google's possession.

Browser plug-in

You do have the option to prevent the archiving of cookies by making pertinent changes to the settings of your browser software. However, we have to point out that in this case you may not be able to use all of the functions of this website to their fullest extent. Moreover, you have the option prevent the recording of the data generated by the cookie and affiliated with your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

Objection to the recording of data

You have the option to prevent the recording of your personal data by Google Analytics by clicking on the following link. This will result in the placement of an opt out cookie, which prevents the recording of your data during future visits to this website: Google Analytics deactivation.

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at:

<https://support.google.com/analytics/answer/6004245?hl=en>.

Contract data processing

We have executed a contract data processing agreement with Google and are implementing the stringent provisions of the German data protection agencies to the fullest when using Google Analytics.

Demographic parameters provided by Google Analytics

This website uses the function "demographic parameters" provided by Google Analytics. It makes it possible to generate reports providing information on the age, gender and interests of website visitors. The sources of this information are interest-

related advertising by Google as well as visitor data obtained from third party providers. This data cannot be allocated to a specific individual. You have the option to deactivate this function at any time by making pertinent settings changes for advertising in your Google account or you can generally prohibit the recording of your data by Google Analytics as explained in section “Objection to the recording of data.”

Archiving period

Data on the user or incident level stored by Google linked to cookies, user IDs or advertising IDs (e.g. DoubleClick cookies, Android advertising ID) will be anonymised or deleted after 14 months. For details please click the following link:

<https://support.google.com/analytics/answer/7667196?hl=de>

Plug-ins and Tools

Google Web Fonts (local embedding)

This website uses so-called Web Fonts provided by Google to ensure the uniform use of fonts on this site. These Google fonts are locally installed so that a connection to Google's servers will not be established in conjunction with this application.

Google Maps

Via an API, this website uses the mapping service Google Maps. The provider is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google's servers in the United States, where it is archived. The operator of this website has no control over the data transfer. You hereby consent to us transferring your IP address to a Google server in the United States.

We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Article 6 (1) (f) of the GDPR.

For more information on the handling of user your personal data, please review Google's Data Privacy Declaration under:

<https://policies.google.com/privacy?hl=en>.

Custom Services

Job Applications

We offer website visitors the opportunity to submit job applications to us (e.g. via e-mail, via postal services on by submitting the online job application form). Below, we will brief you on the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection,

processing and use of your personal data will occur in compliance with POPIA and any other applicable statutory provisions and that your personal data will always be treated as strictly confidential. We will always ensure that we have a legal basis to collect your personal data for job application purposes.

Scope and purpose of the collection of data

If you submit a job application to us, we will process any affiliated personal data (e.g. contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to make a decision concerning the establishment or an employment relationship. The general legal grounds for the aforementioned are Section 11(1)(b) of POPIA or § 26 New GDPR according to German Law (Negotiation of an Employment Relationship), Article 6 (1) (b) of the GDPR (General Contract Negotiations) and - provided you have given us your consent, in terms of Section 11(1)(a) or Article (6) (1) (a) of the GDPR to process your personal data for purposes of processing your job application prior to the conclusion of an employment contract with you. You may revoke any consent given at any time - however, please note that if you do so, we may not be able to process your job application any further. Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application. However, please note that these may include third parties, which may be involved in the process for employment related background checks and assessments including psychometric tests.

If your job application should result in your recruitment, the personal data you have submitted will be archived on the grounds of § 26 New GDPR and Article 6 (1) (b) of the GDPR or Section 11(1)(b) of POPIA for the purpose of implementing the employment relationship in our data processing system and processed in terms of Section 11(1)(c) of POPIA or Article 6(1)(c) of the GDPR.

Data Archiving Period

If we should not be able to offer you a position, if you refuse a job offer, retract your application, revoke your consent to the processing of your data or ask us to delete your personal data, we will store your transferred personal data, including any physically submitted application documents for a maximum of 2 years after the conclusion of the application process (retention period) to enable us to track the details of the application process in the event of disparities (per Section 11(1)(f) of POPIA or Article 6 (1) (f) of the GDPR.

YOU HAVE THE OPTION TO OBJECT TO THIS STORAGE/RETENTION OF YOUR DATA IF YOU HAVE LEGITIMATE INTERESTS TO DO SO THAT OUTWEIGH OUR INTERESTS.

Once the retention period has expired, the data will be deleted, unless we are subject to any other statutory retention obligations or if any other legal grounds exist to continue to store the data. If it should be foreseeable that the retention of your data will be necessary after the retention period has expired (e.g. due to imminent or pending litigation), the data shall not be deleted until the data have become irrelevant. This shall be without prejudice to any other statutory retention periods.