



OLD MUTUAL PRIVACY NOTICE FOR JOB APPLICANTS

Old Mutual is committed to protecting the privacy and security of your personal information.

This Notice explains how we obtain, use and disclose personal information about you, as is required by the Protection of Personal Information Act (“POPIA”).

This Notice sets out:

- Who we are
- What personal information we collect
- Lawful basis for processing
- How your personal information is collected
- How we use your information
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correct your personal information
- Changes to this Notice
- How to contact us
- The Information Regulator’s contact details

WHO WE ARE

In this Notice, “Old Mutual”, “Old Mutual Group”, “we” or “our” 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 criminal convictions/allegations and offences

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

LAWFUL BASIS FOR PROCESSING

Depending on the processing activity, we rely on the following lawful basis for processing your personal data 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
- Section 11(1)(f) for the purposes of our legitimate interest

We will only use or disclose personal information concerning an employee's race or ethnic origin, religious beliefs or philosophical or trade union membership, health and criminal behaviour provided to us with your explicit 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.



Health and biometric information

- Section 27: with your consent, and/or
- Section 32: for reasons related to enforcement of contractual obligations, your employment relationship with Old Mutual and /or any other permissible reason under section 32.

Criminal behaviour and biometric information

We process information about staff criminal convictions and offences. 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 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 sometimes from an employment agency or background check provider. We will sometimes collect additional information from third party sources including referees (for example former employers), social media platforms, credit reference agencies or background check agencies. If you are a secondee, we will collect information from your current employer. Where possible, we will inform you what information you are required to provide to us and what 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.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.

HOW 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 or 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

TO WHOM WE DISCLOSE YOUR INFORMATION

We will not communicate your personal information to third parties unless:

- It is for purposes of credit reference checks or sharing with law enforcement agencies
- Required or authorised by law
- It is disclosed to our service providers who are involved in the delivery of services to our employees (in which event we will have agreements in place with such service providers to ensure the confidentiality and integrity of your personal information)
- We believe it is necessary to protect our rights

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.

CROSS BORDER TRANSFER OF INFORMATION

We may from time to time choose to make use of service providers who resides outside of South Africa and will need to transfer your personal information to another country for processing or storage. Before we transfer any personal information outside of South Africa 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.

RETENTION OF PERSONAL INFORMATION

We will take reasonable measures to ensure that your personal information is not kept for longer than is necessary, unless you have consented that we may keep your personal information for longer. Your personal information will only be kept as long as required by law, or we reasonably requires the record for lawful purposes related to Old Mutual's functions or activities.

YOUR RIGHTS: ACCESS TO AND CORRECTION OF YOUR INFORMATION

You have the right to request a copy of the personal information we hold about you and to request that we correct any errors or delete certain information (subject to legal retention requirements).

We will take all reasonable steps to ensure that all the personal information we hold about you is accurate and kept up to date. To ensure such accuracy, you agree to check your personal information and keep your personal information updated should it change.

CHANGES TO THIS NOTICE

Please note that we may amend this Privacy Notice from time to time. Please check the OM website (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, please contact us at the following numbers/addresses:

Yvonne Mkefa: EmployeeRelations@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>

Tel: 012 406 4818

Fax: 086 500 3351

Email: inforeg@justice.gov.za