



VROOPA (PTY) LTD

Privacy Policy

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1. INTRODUCTION

- 1.1. Vroopa (Pty) Ltd ("**Vroopa**") offers local support with Human Resources and qualification verification services that seek to expedite the recruiting process through talent matching services.
- 1.2. Vroopa's scope of business requires the Processing of Personal Information of its Data Subjects. Accordingly, in terms of the Protection of Personal Information Act 4 of 2013, inclusive of its Regulations ("the POPI Act"), Vroopa is required to protect the Personal Information that it processes. Vroopa is committed to protecting and respecting your privacy. We strive to ensure that our use of your Personal Information is lawful, reasonable, and relevant to our business activities, with the ultimate goal of seeking opportunities for employment, youth empowerment, career development, and talent acquisition.
- 1.3. This privacy policy sets out the manner in which Vroopa processes information and provides clarity on the purpose for which the information is collected, as well as how Data Subjects may participate in the Processing of their Personal Information.
- 1.4. This privacy policy applies when you visit or use our Website and other related online and/or social media platforms.

2. INTERPRETATION

- 2.1. Clause headings are for convenience and reference only and shall not be used in the interpretation of this notice.
- 2.2. Any gender includes the other genders, and a natural person includes a juristic person and *vice versa*.

3. DEFINITIONS

For the purposes of this privacy policy the following definitions and/or expressions shall, unless the context indicates otherwise, bear the meaning assigned to them below and in the POPI Act:

- 3.1. "**Account**" means a unique account created for you to access our Service or parts of our Service.
- 3.2. "**Cookies**" are small pieces of data sent from a website and stored on the user's Device by the



user's web browser to collect and remember information or record the user's browsing activity.

- 3.3. **“Data Subject”** means the person to whom Personal Information relates.
- 3.4. **“Device”** means any electronic device that can access the Service, including but not limited to a computer, a cell phone or a digital tablet.
- 3.5. **“Personal Information”** has the same meaning as defined in the Protection of Personal Information Act 4 of 2013;
- 3.6. **“Processing”** has the same meaning as defined in the Protection of Personal Information Act 4 of 2013
- 3.7. **“Service”** refers to Vroopa's services as per their Website.
- 3.8. **“Service Provider”** means any natural or legal person who processes the data on behalf of Vroopa. It refers to third-party companies or individuals employed by Vroopa to facilitate the Service, to provide the Service on behalf of Vroopa, to perform services related to the Service or to assist Vroopa in analysing how the Service is used.
- 3.9. **“Third-party Social Media Service”** refers to any website or any social network website through which a user can log in or create an account to use the Service.
- 3.10. **“Usage Data”** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- 3.11. **Website** refers to Vroopa's website accessible from www.vroopa.co.za.

4. COLLECTING AND USING YOUR PERSONAL DATA

Data collection will usually be collected with the consent, and from the data subject directly, except for circumstances otherwise provided for in section 12(2) of the POPI Act. See Annexure C for the consent from.

4.1. Types of Data Collected

4.1.1. Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personal Information will only be processed by Vroopa if, given the purpose for which it is processed, it is adequate, relevant, and not excessive. Personally, identifiable information may include, but is not limited to:



- 4.1.1.1. Email address
- 4.1.1.2. First name and last name
- 4.1.1.3. Identity number or passport number
- 4.1.1.4. Phone number
- 4.1.1.5. Curriculum Vitae
- 4.1.1.6. Qualifications
- 4.1.1.7. Usage Data

4.1.2. **Usage Data**

- 4.1.2.1. Usage Data is collected automatically when using the Service.
- 4.1.2.2. Usage Data may include information such as your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

4.2. **Further Processing of Data**

- 4.2.1. The further processing of Data by Vroopa is allowed if it is compatible with the purpose of collection and the Data Subject Consents to the further processing of data.

5. **TRACKING TECHNOLOGIES AND COOKIES**

5.1. We use Cookies and similar tracking technologies to track the activity on our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service. The technologies we use may include:

5.1.1. **Cookies or Browser Cookies.** A cookie is a small file placed on your Device. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some parts of our Service. Unless you have adjusted your browser setting so that it will refuse Cookies, our Service may use Cookies.

5.1.2. **Flash Cookies.** Certain features of our Service may use local stored objects (or Flash Cookies)



to collect and store information about your preferences or your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how you can delete Flash Cookies please refer to your browser.

5.1.3. **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity). Cookies can be "persistent" or "session" Cookies. Persistent cookies remain on your personal computer or mobile device when you go offline, while session Cookies are deleted as soon as you close your web browser. Learn more about cookies: [What Are Cookies?](#).

5.2. We use both session and persistent Cookies for the purposes set out below:

5.2.1. **Necessary / Essential Cookies**

5.2.1.1. Type: Session Cookies

5.2.1.2. Administered by: Us

5.2.1.3. Purpose: These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services.

5.2.2. **Cookies Policy / Notice Acceptance Cookies**

5.2.2.1. Type: Persistent Cookies

5.2.2.2. Administered by: Us

5.2.2.3. Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

5.2.3. **Functionality Cookies**



- 5.2.3.1. Type: Persistent Cookies
- 5.2.3.2. Administered by: Us
- 5.2.3.3. Purpose: These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Website.

6. USE OF PERSONAL DATA

- 6.1. We will not intentionally disclose your Personal Information, whether for commercial gain or otherwise, other than with your permission, as permitted by applicable law or in the manner as set out in this privacy policy.
- 6.2. You agree and give permission for us to share your Personal Information under the following circumstances:
 - 6.2.1. To enable Vroopa to carry out actions for the conclusion or performance of its contract with the Data Subject;
 - 6.2.2. In order to verify personal information and qualifications with the relevant qualification agency;
 - 6.2.3. For our Human Resources department to facilitate our talent matching database;
 - 6.2.4. With our agents, advisers and suppliers that have agreed to be bound by applicable data protection legislation and the privacy policy or similar terms, which offer the same level of protection as this privacy policy;
 - 6.2.5. With our employees, suppliers, consultants, contractors and agents if and to the extent that they require such Personal Information in order to process it for us and/or in the provision of services for or to us, which include know-how and research, pitching to other clients, reporting purposes, hosting, development and administration, technical support and support services relating to the Website or the operation of our business. We will authorise any Personal Information processing done by a third party on our behalf, amongst other things by entering



into written agreements with those third parties governing our relationship with them and containing confidentiality, non-disclosure and data protection provisions. Such persons may be disciplined, their contracts terminated, or other appropriate action is taken if they fail to meet their obligations;

- 6.2.6. To enable us to monitor web traffic. This information is used for internal review, to tailor information to individual visitors and for traffic audits.
- 6.2.7. For statistical purposes: we may perform statistical analyses in order to measure interest in the various areas of the Website (for product development purposes);
- 6.2.8. To protect our rights, property or safety or that of our clients, employees, contractors, suppliers, agents and any other third party;
- 6.2.9. We will obtain your permission before disclosing your Personal Information to any third party for any other purpose.
- 6.3. Vroopa and the Data Subject must take reasonably practicable steps to ensure that the personal information of Data Subjects is complete, accurate, not misleading, and updated where necessary.

7. STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION

- 7.1. We store your Personal Information on:
 - 7.1.1. our servers; or
 - 7.1.2. on the servers of our third-party service providers, such as IT systems or hosting service providers.
- 7.2. In the event of the scenarios contemplated in clauses 7.1.1 and 7.1.2 , we will ensure that we have entered into written agreements with those third-party service providers governing our relationship with them that require them to secure the integrity and confidentiality of Personal Information in their possession by taking appropriate, reasonable technical and organisational measures.



- 7.3. From time to time, Vroopa and its service providers may need to transfer to and/or store your Personal Information on servers in a jurisdiction other than where it was collected and we hereby notify you that such jurisdiction may not have comparable data protection legislation.
- 7.4. If the location to which Personal Information is transferred and/or is stored does not have substantially similar laws to those of South Africa, which provide for the protection of Personal Information, we will take reasonably practicable steps, including the imposition of appropriate contractual terms to ensure that your Personal Information is adequately protected in that jurisdiction.
- 7.5. Please contact us if you require further information as to the specific mechanisms used by us when transferring your Personal Information outside of South Africa or to a jurisdiction that is different to the one in which we collected your Personal Information.

8. SECURITY

- 8.1. We take reasonable technical and organisational measures to secure the integrity of your Personal Information and using accepted technological standards to prevent unauthorised access to or disclosure of your Personal Information, and protect your Personal Information from misuse, loss, alteration, and destruction.
- 8.2. We review our information collection, storage and processing practices, including physical security measures periodically, to ensure that we keep abreast of good practice.
- 8.3. We also create a back-up of your information for operational, business continuity and safety purposes.
- 8.4. Despite the above measures being taken when processing Personal Information, we will not be liable for any loss, claim and/or damage arising from any unauthorised access, disclosure, misuse, loss, alteration, or destruction of your Personal Information.
- 8.5. Vroopa has implemented policies and procedures to address actual and suspected data breaches and undertakes to notify you and the relevant regulatory authorities of breaches in instances in which Vroopa is legally required to do so and within the period in which such notification is



necessary.

8.6. The security of your Personal Data is important to us, but no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

9. RETENTION AND RESTRICTION OF YOUR PERSONAL DATA

9.1. Vroopa will retain your Personal Data for as long as is necessary to provide the Service and fulfill transactions you have requested, or for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, and enforcing our legal agreements and policies.

9.2. Vroopa will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

9.3. Vroopa will destroy or delete a record of Personal Information or de-identify it as soon as reasonably practicable after the Company is no longer authorised to retain the information.

9.4. Vroopa is obligated to restrict the processing of Personal Data if:

9.4.1. The accuracy thereof is contested by the Data Subject;

9.4.2. The Personal Data is no longer needed for achieving the purpose for which it was collected, but has to be maintained for purposes of proof; or

9.4.3. The processing is unlawful and the Data Subject opposes its destruction or deletion and requests the restriction of its use instead.

10. DISCLOSURE OF YOUR PERSONAL DATA

10.1. Business Transactions

If the Company is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject



to a different Privacy Policy.

10.2. Law enforcement

Under certain circumstances, the Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

10.3. Other legal requirements

10.3.1. The Company may disclose your Personal Data in the good faith belief that such action is necessary to:

- 10.3.1.1. Comply with a legal obligation
- 10.3.1.2. Protect and defend the rights or property of the Company
- 10.3.1.3. Prevent or investigate possible wrongdoing in connection with the Service
- 10.3.1.4. Protect the personal safety of users of the Service or the public
- 10.3.1.5. Protect against legal liability

11. LINKS TO OTHER WEBSITES

11.1. Our Service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

11.2. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

12. YOUR RIGHTS

12.1. Data protection legislation may confer certain rights on you in respect of your Personal Information. We aim to be clear about what Personal Information we collect so that you can make meaningful choices about what Personal Information you make available to us. You may, for example:



- 12.1.1. Block all cookies, by setting your browser to do so, including cookies associated with our products and services or to indicate when a cookie is being sent by us.
- 12.1.2. Request access to your Personal Information, which indicates what Personal Information we have about you.
- 12.1.3. Request the correction of your Personal Information, in order to ensure that any incomplete or inaccurate Personal Information is corrected.
- 12.1.4. Request erasure of your Personal Information, where there is no lawful basis for the retention or continued processing of it.

A form titled “Personal Information Request Form” can be found at the end of this privacy policy where any of the above mentioned actions can be requested by you and submitted to us at the contact details provided in 17 below.

- 12.1.5. Object to the processing of your Personal Information for a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- 12.1.6. Request restriction of processing of your Personal Information. This enables you to ask Vroopa to suspend the processing of your Personal Information in limited circumstances.
- 12.1.7. Withdraw consent that you previously gave to the processing of your Personal Information at any time. You may withdraw your consent for us to process your Personal Information at any time by contacting us on the details provided at 17 below. The withdrawal of your consent can only be made by you on the condition that such withdrawal of your consent:
 - 12.1.7.1. does not affect the processing of your Personal Information before the withdrawal of your consent; or
 - 12.1.7.2. does not affect the processing of your Personal Information if the processing is in compliance with an obligation imposed by law on us; or



- 12.1.7.3. does not affect the processing of your Personal Information where such processing is necessary for the proper performance of a public law duty by a public body; or
- 12.1.7.4. does not affect the processing of your Personal Information as required to finalise the performance of a contract in which you are a party; or
- 12.1.7.5. does not affect the processing of your Personal Information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.
- 12.1.8. Withdrawal of consent may limit our ability to provide certain products and services to you or the ability of a third party to provide certain products or services to you, but will not affect the continued processing of your Personal Information in instances in which your consent is not required.
- 12.1.9. Institute civil proceedings regarding an alleged interference with the protection of your Personal Information processed in accordance with this privacy policy.
- 12.1.10. The Data Subject has the right to submit a complaint to the Information Regulator regarding an alleged infringement of any of the rights protected under the POPI Act and to institute civil proceedings regarding the alleged non-compliance with the protection of their or its personal information.
- 12.1.11. The Data Subject has the right to be notified that their or its personal information is being collected by Vroopa. The Data Subject also has the right to be notified in any situation where Vroopa has reasonable grounds to believe that the Personal Information of the Data Subject has been accessed or acquired by an unauthorised person.

13. CHILDREN

The Website and our products or Services are not targeted at people under the age of 18.

14. DIRECT MARKETING



- 14.1. Vroopa processes Personal Information for the purpose of direct marketing by way of electronic communication. We will only send you direct marketing materials if you have specifically opted-in to receive these materials, or if you are a client of Vroopa, and in accordance with applicable laws.
- 14.2. You may refuse to accept, require us to discontinue, or pre-emptively block any approach or communication from us if that approach or communication is primarily for the purpose of direct marketing.
- 14.3. You may opt-out of receiving direct marketing communication from us at any time by requesting us (in any manner, whether telephonically, electronically, in writing, or in person) to stop providing any direct marketing communication to you. You may send your opt-out requests by notifying us at the contact details set out in clause 17 below or where applicable, by notifying your Vroopa contact.

15. CHANGES TO THIS PRIVACY POLICY

- 15.1. We may update our privacy policy from time to time. We will notify you of any changes by posting the new privacy policy on this page.
- 15.2. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "Last updated" date at the top of this privacy policy.
- 15.3. You are advised to review this privacy policy periodically for any changes. Changes to this privacy policy are effective when they are posted on this page.

16. COMPLAINTS PROCEDURE

- 16.1. Data Subjects have the right to complain in instances where any of their rights under the POPI Act have been infringed upon. Vroopa takes all complaints very seriously and will address all the POPI Act related complaints in accordance with the following procedure:
 - 16.1.1. POPI Act complaints must be submitted to the organisation in writing at the contact details provided at 17 below. Where so required, Vroopa will provide the Data Subject with a "POPIA Complaint Form", a copy of the form is also provided at the end of this privacy policy.



- 16.1.2. Vroopa will provide the complainant with a written acknowledgement of receipt of the complaint within 7 (seven) working days.
- 16.1.3. Vroopa will carefully consider the complaint and address the complainant's concerns in an amicable manner. In considering the complaint, Vroopa will endeavour to resolve the complaint in a fair manner and in accordance with the principles outlined in the POPI Act.
- 16.1.4. Vroopa will determine whether the complaint relates to an error or breach of confidentiality that has occurred and which may have a wider impact on the organisation's Data Subjects.
- 16.1.5. Where Vroopa has reason to believe that the Personal Information of Data Subjects has been accessed or acquired by an unauthorised person, Vroopa will consult with the organisation's governing body where after the affected Data Subjects and the Information Regulator will be informed of this breach.
- 16.1.6. Vroopa will revert to the complainant with a proposed solution with the option of escalating the complaint to the organisation's governing body within 30 (thirty) working days of receipt of the complaint. In all instances, the organisation will provide reasons for any decisions taken and communicate any anticipated deviation from the specified timelines.
- 16.1.7. Vroopa's response to the Data Subject may comprise any of the following:
 - 16.1.7.1. A suggested remedy for the complaint,
 - 16.1.7.2. A dismissal of the complaint and the reasons as to why it was dismissed,
 - 16.1.7.3. An apology (if applicable) and any disciplinary action that has been taken against any employees involved.
- 16.1.8. Where the Data Subject is not satisfied with the suggested remedies, the Data Subject has the right to complain to the Information Regulator by completing "POPIA Form 5" on the Information Regulator's website at <https://infoeregulator.org.za/complaints/>
- 16.1.9. Vroopa will review the complaints process to assess the effectiveness of the procedure on a periodic basis and to improve the procedure where required. The reason for any complaints will also be reviewed to ensure the avoidance of occurrences giving rise to POPI Act related



complaints.

17. CONTACT US

17.1. If you have any questions about this privacy policy, you can contact us:

By email: helpdesk@vroopa.co.za



ANNEXURE A

PERSONAL INFORMATION REQUEST FORM

Please submit the completed form to: helpdesk@vroopa.co.za									
Name:									
Contact Number:									
Email Address:									
Please be aware that we may require you to provide proof of identification prior to processing your request.									
Section A: Particulars of Data Subject									
Name & Surname:									
Identity Number:									
Postal Address:									
Contact Number:									
Email Address:									
Section B: Request									
Method of Access Preferred: Paper copies of the documents * <input type="checkbox"/> Electronic copies of the documents <input type="checkbox"/>									
I request the organisation to: (Please tick applicable box) <table style="width: 100%; border: none;"> <tr> <td style="width: 80%;">Inform me whether it holds any of my personal information.</td> <td style="text-align: right;"><input type="checkbox"/></td> </tr> <tr> <td>Provide me with a record or description of my personal information.</td> <td style="text-align: right;"><input type="checkbox"/></td> </tr> <tr> <td>Correct or update my personal information.</td> <td style="text-align: right;"><input type="checkbox"/></td> </tr> <tr> <td>Destroy or delete a record of my personal information</td> <td style="text-align: right;"><input type="checkbox"/></td> </tr> </table>		Inform me whether it holds any of my personal information.	<input type="checkbox"/>	Provide me with a record or description of my personal information.	<input type="checkbox"/>	Correct or update my personal information.	<input type="checkbox"/>	Destroy or delete a record of my personal information	<input type="checkbox"/>
Inform me whether it holds any of my personal information.	<input type="checkbox"/>								
Provide me with a record or description of my personal information.	<input type="checkbox"/>								
Correct or update my personal information.	<input type="checkbox"/>								
Destroy or delete a record of my personal information	<input type="checkbox"/>								
Please complete below any further information on the documents you are requesting (Reference numbers, further particulars etc.)									



Section C: Signature
Signature:
Date:

*Please note that a copy and postage fee may be charged when requesting paper copies of documents.



**ANNEXURE B
COMPLAINT REGARDING THE PROTECTION OF PERSONAL INFORMATION**

<p>In terms of section 74 of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)</p> <p>Please submit the completed form to: helpdesk@vroopa.co.za</p>	
Name:	
Contact Number:	
Email Address:	
<p>NOTE: Where we are unable to resolve your complaint to your satisfaction you have the right to take up your complaint with the Information Regulator by completing Form 5 of the Information Regulator’s website</p>	
Section A: Particulars of Complainant	
Name & Surname:	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	
Section B: Details of Compliant	
Section C: Desired Outcome	



Section C: Signature
Signature:
Date:



ANNEXURE C

CONSENT FORM

I, _____ (*full names*), ID _____ hereby give my consent that Vroopa (Pty) Ltd may use my submitted personal information for the purposes outlined in the Privacy Policy and any other agreement entered into with Vroopa (Pty) Ltd, their Employees, Directors, Agents and the like.

DATED on _____ of _____ 20_____

Signature
Name: _____