




XLink Candidate Privacy Statement

V_02

July 2022

XLink Communications (Pty) Ltd

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Approval	Name	Job Title / Role	Signature
Data Privacy Officer	Tony Smallwood	Managing Executive Operations & Systems	

1. Objective

The objective of this statement is to explain how XLink Communications (Pty) Ltd ("XLink") collects, uses, shares and protects your personal information during our recruitment process.

This document supports the Privacy Risk Management Standard and the following principles:

- XLink is committed to process personal information honestly, ethically, with integrity, and always consistent to applicable law and our values.
- XLink is transparent with potential employees about the personal information we collect, use, share and store about them.
- XLink employees understand how XLink collects and processes their personal information and their rights with respect to this personal information.

2. Privacy Promise

We aim to create a culture where everyone at XLink has a clear understanding of how important privacy is to our employees and how to ensure it is respected. Our Privacy Promise sets out the principles that govern our approach to privacy and how we communicate with employees, partners, and other stakeholders on relevant issues, such as designing products to protect privacy or assisting with law enforcement.

XLink's Privacy Principles are how we operate:

- **Accountability:** we are accountable for living up to these principles throughout our corporate family, including when working with our partners and suppliers. We have in place accountable privacy compliance measures, and we monitor and enforce our compliance with these principles.
- **Fairness and lawfulness:** we comply with privacy laws and act with integrity and fairness. We will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards.

- **Openness and Honesty:** we communicate clearly about actions we take that may impact privacy, we ensure our actions reflect our words, and we are open to feedback about our actions.
- **Choice and access:** we give people the ability to make simple and meaningful choices about their privacy and allow individuals, where appropriate, to access, update or delete their personal information.

How we manage and protect information

- **Responsible Data Management and limited disclosures:** we apply appropriate data management practices to govern the processing of personal information. We choose the partners who participate in processing of personal information carefully and we limit disclosures of personal information to such partners to what is described in our privacy statement or to what has been authorized by our employees.
- **Security safeguards:** we implement appropriate technical and organisational measures to protect personal information against unauthorized access, use, modification, or loss.

How we design our products and services

- **Privacy by Design:** respect for privacy is a key component in the design, development and delivery of our products and services

How we make decisions

- **Balance:** when we are required to balance the right to privacy against other obligations necessary to a free and secure society, we work to minimize privacy impacts.

3. Who we are

XLink Communications (Pty) Ltd is the responsible party for your personal information. Our registered office is XLink Communications (Pty) Ltd, Unit 15 Burnside Office Park, Craighall. We provide details of how to contact us in the "How to contact us" section of this privacy statement.

4. Definitions

In this privacy statement:

"We/us" means XLink Communications (Pty) Ltd.

"Third party" means someone who is not you or us or a part of XLink; and

"XLink Communications (Pty) Ltd" means XLink Communications (Pty) Ltd and any company or other organization in which XLink Communications (Pty) Ltd owns 50% or above of the share capital.

5. The Basics

5.1 Personal information we collect about you

5.1.1 XLink will process your personal information based on

- a. The performance of your employment contract with XLink and to act on your requests, including for example, leave requests or providing you with the correct pay; or
- b. XLink's legitimate business interest, including for example, fraud prevention, maintaining the security of our systems, investigations relating to compliance with our policies or laws, to defend our lawful interests in legal proceedings meeting our targets for diversity, organisational planning and effectiveness and improving our services and workplace for employees; or
- c. Compliance with a mandatory legal obligation, subject to strict internal policies and procedures which control the scope of legal assistance to be provided; or
- d. Consent you provide, where XLink does not rely on another legal basis or in addition to performance of contract or reliance on our legitimate business interests, you choose to provide us with your personal information and the processing of that information is voluntary including for example, when you take part in events organised by XLink. Your consent can be withdrawn at any time.

5.1.2 How we collect personal information about you

We collect personal information about you when you apply for a job at XLink and subsequently as we prepare for you to start your employment with us. Some of the information we collect about you is required by law, for the provision of your employment contract, and to fulfil the obligations within that contract – we will make this clear at the point where we collect the information. If you do not provide this information then we will not be able to create a contract of employment or we will not be able to fulfil our obligations under that contract e.g., paying your salary or approving leave request.

Other personal information we collect is subsequently generated during your employment by our internal processes and applications.

In addition, we collect personal information when you access employee benefits, use of XLink products and services, attending XLink events including training and social activities. Please note that the use of personal information in respect of XLink products and services is always in terms of the XLink Privacy Statement available on the data privacy site on the XLink Intranet – X-Zone, and/or on the XLink website.

We may collect personal information about you from external sources including third party service providers whom we have engaged to provide specific services to you, and to whom you have agreed to share your personal information with us. For example, third parties who process our pensions, share incentive schemes, company car hire or business travel bookings. We may also collect personal information about you where the information has been made publicly available.

5.1.3 The types of personal information we may collect about you are, for example:

- a. **Personal details**, such as name, date of birth, address, personal email address, telephone number, emergency contact details, proof of identity; race, gender, nationality, citizenship, disability status.
- b. **Employment information** means job related information such as employee number, contract of employment, amendments to terms and conditions, letter of resignation, record of service annual leave forms, company email address, company mobile number, job title, job description.
- c. **Recruitment information**, such as your application, CV, interview notes, references from previous employers, internal references.
- d. **Salary and Payment information**, such as identity number, record of pay, payments for travel allowances (e.g., car share), bank details, tax reference details, expenses claims and payments, pension records.
- e. **Performance and Talent information**, such as training, training evaluation records, qualifications, personal development reviews, performance & talent rating, evidence from investigations, records of disciplinary actions.
- f. **General HR administration information**, such as general correspondence with HR, redundancy records, records of complaints and grievances.
- g. **Employee authentication information**, such as your XLink username and password needed to log into the XLink network and in some instances biometric information.
- h. **Our use of work devices and corporate networks**, services, systems, networks, accounts and corporate communications.
- i. **Security in the workplace**, such as onsite CCTV footage and access card records.
- j. **Cookies**, on certain systems and work sites.

We may also process sensitive personal information about you – but only where this is strictly necessary to perform our legal obligations as an employer and when this information is provided on a voluntary basis. For example,

- a. We may collect information about your racial or ethnic origin to evaluate our compliance with the requirements set by equal employment legislation.
- b. We may collect information about your health, such as sickness records, medical certificates, in order provide sick pay or maternity cover and to perform our health & safety obligations as an employer.
- c. We may collect records of criminal convictions for security background checks at the recruitment stage.
- d. We may collect information about your sexual orientation to create anonymous and aggregated reports – but only where you provide this information voluntarily and we have collected your consent to process information for these purposes.
- e. We may collect biometric information for security or fraud prevention purposes.

5.2 How we use information about you

We may process the personal information that we collect about you for the following purposes:

- a. **Resourcing**, such as recruiting people internally, onboarding people into XLink, managing international mobility. For example, during onboarding we collect your personal email address so we can correspond with you during the recruitment process.
- b. **Learning and development**, such as identifying learning requirements, managing learning solutions, delivering learning. For example, XLink may use your profile to recommend training courses.
- c. **Rewards and Recognition**, such as performing annual reward review, managing recognition and reward, managing global shares schemes. For example, we use information about your pay to generate your end of year reward statement.
- d. **Communication & Involvement**, such as conducting surveys amongst employees, letting you know about important business change. For example, we may conduct surveys with our employees to collect insights on a specific topic like diversity and inclusion.
- e. **Providing you with products and services** such as products and services offered as part of your employee benefits.
- f. **Maintain employee health, safety, and wellbeing**, such as managing employee safety and wellbeing incidents, monitoring employee wellbeing, conducting employee safety and wellbeing audit. For example: using information about incidents to register workplace incidents.
- g. **Organisation Effectiveness & Change**, such as internal reporting or analysis to support business and cultural change or reviewing organisational effectiveness and organisational planning. For example, we may use your workplace location and access card records to understand the impact on desk capacity in our sites.
- h. **Information security and investigations**, please see 5.2.1 Monitoring your use of devices, networks and accounts below for more information.
- i. **Operational & administration**, such as managing requests and changes to your information during your employment lifecycle including payroll, recording time and attendance, travel and expenses, user access management, Office IT and resolving issues and requests raised to HR services.
- j. **Performance and talent management**, such as managing employee performance aligned to business goals, review employee potential, identify and review development of talent, management of resource. For example, we believe in "pay for performance" and to continue to differentiate our reward based on performance and potential.
- k. **Meeting our legal obligations as an employer**, such as providing government agencies with your employment information and managing our tax responsibilities. For example, we will provide your tax information to the government agencies.
- l. **Meeting our contractual obligations as your employer**, such as managing your employment contract. For example: we must include your name, date of birth and other information in the employment contract you enter with us.
- m. **Defend XLink's lawful interests**, for example in legal proceedings in accordance with applicable laws.

5.2.1 Monitoring your use of devices, networks and accounts

To ensure XLink is compliant with its internal policies, we may process your employee personal information for the purposes of monitoring your compliance with internal XLink policies such as collecting your personal information on our Gifts & Hospitality register to

comply with our Anti- bribery policy. You will find these policies on the XLink Intranet. This information may be processed during an investigation into such a matter.

To protect the confidentiality, integrity, and availability of XLink's business information, personal information and our IT and other systems, we monitor, to the extent allowed by applicable laws your use of:

- XLink owned equipment (for example your company laptop, tablet and phone).
- User owned devices (for example devices that are owned by a XLink employee and that are used to access XLink's systems and to access, process, store and transmit XLink's corporate data).
- Corporate networks and IT (for example your access to document management systems, your use of internal networks, tools, applications, and your online browsing); and
- Corporate communications accounts (for example your messages sent via Outlook, Teams, Yammer– this can include, in certain circumstances, viewing the content of your messages).

Who we share information about you with

We may share personal information about you with:

- Other companies in the XLink Group and/or Vodacom Group, which will process your personal information solely and only, for the purposes in section 4.2.
- Third parties, such as recruitment agencies, test providers and others who help us fill vacancies and assess the suitability of candidates and progress applications. Where we use third parties, XLink ensures that there is a written agreement and that they meet the same privacy and security standards as XLink.
- Law enforcement agencies, government bodies, regulatory organisations, courts, or other public authorities if we must, or are authorised to by law.
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement.

Where we process information about you

In doing the above, we may need to transfer personal information about you to other companies in the XLink or Vodacom Group or third parties located (or whose servers may be located) in countries outside of the country where you have applied, including countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organizational measures to protect your personal information. Please contact the local Privacy Officer if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers. Their contact details are available under section 7 'How to contact us' in this privacy statement.

How long we keep information about you

We will keep your information for as long as it is necessary for the recruitment process. If you are successful, we will keep your information for the duration of your employment, should you wish to apply for other roles within XLink. If we are not able to offer you a role, we may keep

your information for up to 2 years to contact you about future roles that may interest you, but only where we have collected your consent to do so – you can withdraw your consent at any time in your candidate profile.

We will anonymize your information in accordance with our retention policy and may retain those anonymized records to monitor the effectiveness of our recruitment process. For example, we may create reports to understand what nationalities have applied for roles with XLink in the last 12 months – you will not be identifiable in these reports.

Your Rights

- a) **Right to correct or update information:** you have the right to correct or update the personal information we process about you if it is not accurate. If the information we process about you needs updating, or you think it may be inaccurate, you can update your information in your candidate profile.
- b) **Right to access:** you have the right to request a copy of the personal information we process about you. You can apply for a copy of your personal information.
- c) **Right to object:** you have the right to object to XLink processing your personal information where we rely on our legitimate interest to do so for example, using your contact information to contact you about other roles at XLink. If you wish to object to processing, you can change your preferences in your candidate profile at any time or make an objection request by contacting HR@XLinkco.za.
- d) **Right to deletion:** in certain circumstances you have the right to request that we erase the personal information we hold about you. You can request for your information to be deleted by contacting HR@XLink.co.za.
- e) **Right to restrict use of your information:** if you feel the personal information we hold about you is inaccurate or believe we should not be processing your personal information, you may have the right to ask us to restrict processing that information. You can request to restrict processing by contacting HR@XLink.co.za.

If we do not act based on any of the above requests, we will inform you of the reasons why.

Changes to this Privacy Statement

This privacy statement is updated from time to time, so we would encourage you to check it regularly on your local policy portal. If we make a major change, we will let you know by email.

How to Contact Us

If you have any further questions about this privacy statement or how we process your information, please contact the local Privacy Officer at tonys@XLink.co.za.

We will do our best to help but if you are still unhappy, you can contact The Information Regulator (South Africa) at: The Information Regulator (South Africa) SALU Building, 316 Thabo Sehume Street, PRETORIA, Tel: 012 406 4818, Fax: 086 500 3351, infoereg@justice.gov.za.