

# JG AFRIKA

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## PRIVACY POLICY



# Contents

<b>PRIVACY POLICY &amp; MANUAL</b>	<b>3</b>
1. Collection and use of your Personal Information	3
2. Protection of your Personal Information	7
3. Social Media	7
4. Social Media Widgets	7
5. Cloud	7
6. Telephones	8
7. Retention	8
8. Your Rights as a Data Subject	8
9. Changes to this Privacy Policy	9
10. Internal Records	9
11. Personnel Records	10
12. Client-Related Records	10
13. Other Parties	10
14. Other Records	11
15. Contact Us	11

# PRIVACY POLICY & MANUAL

## **About Us**

JG Afrika (Pty) Ltd. is an award winning, multi-disciplinary civil engineering and environmental consulting firm based in South Africa. We are committed to maintaining the privacy and security of your Personal Information and complying with the Protection of Personal Information Act (“POPIA”).

We act as a Responsible Party for the Personal Information provided by employees, clients, business partners, consultants, and other individuals, including website users, job applicants, students seeking bursaries, and those who wish to add their information to our “Skills Database”, and those who access the JG Afrika “Careers” page on the company’s website.

Please take the time to read this Privacy Policy as it provides information about the types of Personal Information we may collect, how we may use it and how it is protected.

When reading this Privacy Policy on any of the JG Afrika websites, it should be read in conjunction with our website’s [Terms & Conditions – JG Afrika](#)

The details of JG Afrika entities who are Responsible Parties of Personal Information are set out here.

Responsible Party: JG Afrika (Pty) Ltd.

Information Officer: Paul Olivier, MD. [Olivierp@jgafrika.com](mailto:Olivierp@jgafrika.com)

Deputy Information Officer: Jacqui Sonderegger: [hr@jgafrika.com](mailto:hr@jgafrika.com)

If you have any questions about the Responsible Party of your Personal Information, please refer to the “Contact Us” section below.

## **1. Collection and use of your Personal Information**

This section describes the types of Personal Information that JG Afrika collects and processes about you.

The types of Personal Information that JG Afrika collects and processes about you depends on whether you are a potential or existing employee, client or business partner, a JG Afrika website user, a job seeker, or a student seeking to apply for a bursary. If you provide JG Afrika with Personal Information about other individuals, please refer them to this Privacy Policy.

View the categories below to understand how JG Afrika collects and processes your personal Information.

### **A. JG Afrika website users or persons interacting with JG Afrika on Social Media or email.**

#### **(1) What information may JG Afrika collect?**

- (a) Your name
- (b) Company
- (c) Title
- (d) Email Address
- (e) Telephone number
- (f) Your IP addresses
- (g) Information obtained by our use of cookies and widgets

- (2) How will JG Afrika collect your Personal Information?
- (a) Through requests or inquiries to JG Afrika through email, social media sites or affiliated blogs.
  - (b) Through a JG Afrika marketing related messages and subscriptions.
  - (c) Through your access to the JG Afrika website. Cookies may be placed on your computer or mobile device.
  - (d) Through a business event or conference
  - (e) In person
  - (f) Provisions of services for or otherwise contracting with JG Afrika
  - (g) Through the development of business partnerships
  - (h) At the occasion of visiting JG Afrika offices, sites, facilities or accessing JG Afrika's systems
  - (i) Through direct contact with JG Afrika by telephone (voice over IP (VOIP). Telephones may capture your Personal Information.
  - (j) From public sources, such as internet searches, your company website, and social media sites (such as LinkedIn) through questions, answers, comments and re-posting between you and JG Afrika.
- (3) What does JG Afrika use your Personal Information for?
- JG Afrika uses the Personal Information provided for legitimate business purposes only. This includes:
- (a) Marketing its services
  - (b) Engaging in business development activities
  - (c) Entering or performing obligations under a contract JG Afrika may hold with you,
  - (k) To engage with clients and business partners
  - (l) To deliver its professional services, and/or
  - (m) As otherwise permitted by applicable law.
- (4) The following are examples of the ways JG Afrika uses your Personal Information for business purposes:
- (a) To answer any inquiries or requests you make.
  - (b) To further communicate with you on any matter relating to your inquiry or request.
  - (c) To contact you about other JG Afrika information and services that may be of interest to you. Please also refer to the section "Recipients of JG Afrika Electronic Messages".
  - (d) To provide professional services.
  - (e) To engage you as a business partner.
  - (f) To manage JG Afrika's business relationship with you or your employer.
  - (g) To comply with legal obligations.
  - (h) To investigate and prevent fraud or misconduct.
  - (i) To issue communications or billings around projects, contracts or joint ventures.
  - (j) To pursue or contract for work.
  - (k) To evaluate prospective service providers.
  - (l) To answer questions and inquiries related to services of either party.

- (m) To otherwise conduct everyday business activities, such as business development, business planning, strategic reviews and statistical, evaluation and reporting purposes.
  - (n) To contact you about other JG Afrika information and services that may be of interest to you. Also see the section for “Recipients of JG Afrika electronic messages”.
- (5) Who will JG Afrika share your Personal Information with?
- JG Afrika will not sell, rent or trade your Personal Information to any third party and will only share your Personal Information with:
- (a) Other JG Afrika entities.
  - (b) Third party service providers who process data on JG Afrika’s behalf or who facilitate or are outsourced one or more aspects of the operation of the websites or the business. Third party service providers may include, inter alia, Mimecast, People Resolutions, Sage and Paywell, as well as lawyers in connection with actual or threatened litigation, and auditors.
  - (c) JG Afrika business partners who provide services to our clients.
  - (d) JG Afrika clients where you are a business partner.
  - (e) Third parties where JG Afrika is required by law, such as to comply with a legal process.
  - (f) To third parties when it is reasonably believed that disclosure is necessary to protect people’s safety, security, rights, or property, or as otherwise permitted by applicable law.
  - (g) To the police or financial crime and fraud detection agencies to investigate fraud or corruption, or to conduct any similar sharing permitted by applicable law.
  - (h) To a government entity in response to a government request.

#### B. Potential or Existing Job Applicants

JG Afrika collects and processes your Personal Information when you apply for a job at JG Afrika, or add your details to our Skills Database, including applications made for specific vacancies on the JG Afrika Careers website. In accordance with applicable law, JG Afrika may keep the information you submit in connection with an application for employment and for future consideration. Please also refer to our “Terms & Conditions and the POPI Act Agreement Declaration”, which must be read and agreed to before any online submissions may be made.

- (1) What Information may JG Afrika collect?
- (a) Your name
  - (b) Address
  - (c) Contact details.
  - (d) Education background
  - (e) University Transcripts
  - (f) Employment history
  - (g) Reference or results of employment checks
  - (h) Your resume (CV)
  - (i) Information obtained from your cover letter and in the context of your job application

All information provided in job applications must be accurate and any errors may result in withdrawal of an offer of employment or termination of employment. When applying through JG Afrika Careers webpages, you may request that JG Afrika delete or update your Personal Information by sending an e-mail to [hr@jgafrika.com](mailto:hr@jgafrika.com).

(2) How will JG Afrika collect your Personal Information?

- (a) Directly from you when you provide it in your resume (CV) or in the context of a job application
- (b) From JG Afrika Careers webpages
- (c) From references you provide
- (d) From references received from third parties such as educational institutions or your current or past employers
- (e) From employment checks, including from publicly available sources, such as Google and LinkedIn

(3) What does JG Afrika use your Personal Information for?

JG Afrika uses the Personal Information it is provided with for legitimate business purposes, including to entering a possible employment relationship with you, and because there is a legitimate business need to assess job applications or as otherwise permitted by applicable law. The following are examples of the ways JG Afrika uses your Personal Information for business purposes:

- (a) To consider your application and assess your suitability for the position applied for or for other suitable positions that might match your profile.
- (b) To check/obtain information or references about you from third parties.
- (c) To inform you of job opportunities that might be of interest to you.
- (d) To review and assess JG Afrika's hiring policies, practices, and statistics.

(4) Who will JG Afrika share your Personal Information with?

JG Afrika will not sell, rent or trade your Personal Information to any third party and will only share your Personal Information with:

- (a) Other JG Afrika entities.
- (b) Third parties contacted by JG Afrika to verify your information and to obtain references such as your previous employers or education institutions.
- (c) Third parties where JG Afrika is required by law, such as to comply with a legal process.

#### C. Recipients of JG Afrika Electronic Messages.

When you provide contact data to JG Afrika, including through JG Afrika websites, JG Afrika may send you electronic messages related to its services. You may opt out of receiving marketing related electronic messages by clicking on the unsubscribe link contained in the footer of the message or by sending a blank email to [marketing@jgafrika.com](mailto:marketing@jgafrika.com).

- (1) Please note that even if you opt-out of commercial electronic messages, JG Afrika may still need to contact you electronically with information about its business relationship with you, your account or data.



## 2. Protection of your Personal Information

This section describes the mechanisms used by JG Afrika to protect personal information.

- A. JG Afrika employs reasonable security measures and technologies to keep your Personal Information secure and protected against loss, misuse, unauthorized access, disclosure, alteration and destruction.
- B. Where third party vendor organizations process Personal Information on JG Afrika's behalf, specific security arrangements will be implemented, when required, through contractual arrangements with those organizations.
- C. JG Afrika may use your email address to contact you about a security incident involving your Personal Information.
- D. E-mail monitoring or blocking software may be used for security purposes and for compliance with JG Afrika policies.

## 3. Social Media

This section describes the considerations that should be taken when you use JG Afrika's social forums and the types of social media widgets on JG Afrika's websites.

- A. Any information you post or disclose on JG Afrika's social media, for example, LinkedIn, is public. JG Afrika cannot control the use of information disclosed in social media platforms. Exercise caution when disclosing information in public areas and be careful what Personal Information you disclose and how you disclose it.

## 4. Social Media Widgets

JG Afrika websites may include social media widgets. Social Media widgets are either hosted by a third party or hosted directly on JG Afrika's website. Your interactions with these widgets are governed by the privacy policy of the company providing it. These widgets may collect your IP address and may set a cookie to enable the feature to function properly.

## 5. Cloud

This section describes JG Afrika's use of cloud services and what this means for you.

- A. JG Afrika may store your Personal Information in the cloud. This means that your Personal Information may be processed on JG Afrika's behalf by a cloud provider and could be stored in different locations around the world. JG Afrika makes use of organizational and contractual measures to protect your Personal Information and to impose appropriate security and data protection requirements on our cloud services providers, including the requirement that your Personal Information be processed exclusively for the purposes set out in this Privacy Policy.

## 6. Telephones

This section describes the type of technology used by JG Afrika for its telephone services and what this means for you.

- A. JG Afrika uses VOIP technology when you communicate with JG Afrika over the telephone. As your call will be relayed via the internet, JG Afrika cannot control where your data is processed. JG Afrika's VOIP services are managed by Itec.

## 7. Retention

This section describes JG Afrika's information retention practices.

- A. JG Afrika retains your Personal Information for no longer than is necessary. JG Afrika will further retain and use your Personal Information as necessary to comply with legal obligations, resolve disputes, and enforce agreements.
- B. JG Afrika retains customer information for as long as we need to provide services, and for a period of 3 years after the business relationship ends, unless:
  - (1) legally compelled to retain such information, or
  - (2) in the case of a litigation, or
  - (3) potential litigation.

## 8. Your Rights as a Data Subject

This section describes your rights as a data subject.

- A. In accordance with applicable law, you have the following rights, subject to some conditions and exceptions:
  - (1) To object to the processing of your Personal Information for direct marketing purposes. To exercise this right, or, to opt out of commercial electronic messages, click on the unsubscribe link at the bottom of the message or send an email to [marketing@jgafrika.com](mailto:marketing@jgafrika.com).
  - (2) To access a copy of your Personal Information and details about how JG Afrika uses it.
  - (3) To have your Personal Information corrected or updated.
  - (4) To request deletion of your Personal Information. If JG Afrika receives such a request, other factors will need to be considered when assessing whether to comply.
  - (5) To request restriction of processing of your Personal Information, for example where you believe that the Personal Information, we have about you is inaccurate.
- B. All requests regarding your Personal Information should be emailed to the Deputy Information Officer [hr@jgafrika.com](mailto:hr@jgafrika.com).
- C. JG Afrika will respond to such requests within thirty business days of their receipt or within any other delay required or authorized by applicable law.



- D. JG Afrika will take reasonable steps to functionally correct or delete your Personal Information from JG Afrika database(s) upon request, although JG Afrika may keep a copy for archival purposes in compliance with applicable laws.
- E. Before JG Afrika provides you with any data, corrects any inaccuracies or deletes any data, JG Afrika may request additional information to verify your identity or otherwise help respond to your request.
- F. All requests for access will be evaluated on a case-by-case basis. There may be applicable grounds of refusal of such a request, as set out in the Act.
- G. Many of the records held by JG Afrika are those of third parties, such as clients and employees, and we take the protection of third-party confidential information very seriously. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

## 9. Changes to this Privacy Policy

- A. JG Afrika may need to make changes to this Privacy Policy from time to time to reflect any changes in data protection and privacy laws and to update you on JG Afrika's privacy practices.
- B. This Privacy Policy was last updated 06 September 2021.

## 10. Internal Records

The following are records pertaining to JG Afrika's own affairs:

- A. Memoranda and Articles of Association
- B. Financial records
- C. Operational records
- D. Intellectual property
- E. Internal correspondence
- F. Service records
- G. Statutory records
- H. Internal policies and procedures
- I. Minutes of meetings
- J. Annual General Reports
- K. Financial Results

- L. Charters, codes of conduct and policies (both internal and external) to which JG Afrika and its personnel subscribe; and
- M. Records held by officials of JG Afrika.

## 11. Personnel Records

For the purposes of this section, “personnel” means any person who works for or provides services to or on behalf of JG Afrika and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of JG Afrika. This includes, without limitation:

- A. Partners
  - B. Directors
  - C. Permanent, temporary, and part-time staff as well as
  - D. Consultants
- (1) Personnel records include the following:
- (a) Any personal records provided to us by our personnel.
  - (b) Any records a third party has provided to us about any of their personnel.
  - (c) Conditions of employment and other personnel-related contractual and quasi-legal records.
  - (d) Employment policies and procedures.
  - (e) Internal evaluation and disciplinary records; and
  - (f) Other internal records and correspondence.

## 12. Client-Related Records

Client-related information includes the following:

- A. Contracts with the client and between the client and other persons.
- B. Any records a client has provided to JG Afrika or a third party acting for or on behalf of JG Afrika (including financial, legal, tax, operational, employee and similar records).
- C. Records, reports, designs and the like generated by JG Afrika for its clients.
- D. Any records a third party has provided to JG Afrika which concerns a client; and
- E. Records generated by or within JG Afrika pertaining to the client, including transactional records.

## 13. Other Parties

Records are kept in respect of other parties, including without limitation joint ventures and consortia to which JG Afrika Consulting Engineers is a party, contractors and sub-contractors, suppliers, service

providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to JG Afrika.

A. The following records fall into this category:

- (1) Personnel, client, or JG Afrika records which are held by another party as opposed to being held by JG Afrika.
- (2) Records held by JG Afrika pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers.

## 14. Other Records

We hold further records, including:

- A. Information relating to JG Afrika's own commercial activities.
- B. Procurement and administration for JG Afrika and
- C. Research information belonging to JG Afrika or carried out on behalf of a third party.

## 15. Contact Us

If you have any questions, complaints or concerns about privacy or the security of your Personal Information, please contact the JG Afrika Deputy Information Officer at [hr@jgafrika.com](mailto:hr@jgafrika.com). Where relevant or required, JG Afrika will collaborate with the appropriate regulatory authorities to resolve any complaints or issues regarding Personal Information.

**Name of Company:** JG Afrika (Pty) Ltd.

**Designated Deputy Information Officer:** Jacqui Sonderegger [hr@jgafrika.com](mailto:hr@jgafrika.com).

**Postal Address:** PO Box 1109, Sunninghill, 2157

**Street Address:** JG Afrika House, 37 Sunninghill Office Park, Peltier Drive, Sunninghill, 2191

**Phone Number:** 011 231 2200

<https://www.jgafrika.com/contact-us/>