

# HR Privacy Policy

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Betapoint Management Consultants (Pty) Ltd

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## 1. HR Privacy Notice

Betapoint (Pty) Ltd ("**Betapoint**") is providing this Betapoint HR Privacy Notice ("**HR Privacy Notice**") to give its employees, job applicants, contractors (collectively "**Personnel**") and other individuals whose Personal Data is collected for human resources purposes (such as dependents) information regarding how we collect and use your Personal Data for these purposes. In this Notice, "**Personal Data**" means data relating to an identified or identifiable individuals and households.

This HR Privacy Notice applies only to Personal Data used in the context of Human Resources, employment, and other internal business functions relating to our Personnel and their family members or beneficiaries, including internal computer systems, networks, and online services. **Betapoint's** external Privacy Policy ("**Privacy Policy**") describes how we collect, use and protect the Personal Data of consumers of **Betapoint's** products and services.

If you are a current **Betapoint** employee, you can send an email to [info@betapoint.co.za](mailto:info@betapoint.co.za) to exercise your rights of access and correction with respect to Personal Data subject to this HR Privacy Notice, and in some cases, you may be able to access or update information directly through online services or portals. You may also contact your local HR manager for assistance. If you are a contractor, or an applicant, former employee or family member, please contact us at the address or email listed below for assistance with your privacy requests.

### 1.1. General Purposes for Collecting, Using and Disclosing Personal Data

**Betapoint** collects Personal Data about its prospective, current, and former Personnel and other individuals as appropriate in the context of an employment or contractual work relationship (such as dependents), including for recruitment and IT/technical support services. The categories of Personal Data we process, along with representative data elements, are listed in the chart below. We generally use, disclose and retain Personal Data processed under this HR Privacy Notice for the following purposes:

- (a) Personal Data pertaining to *prospective* employees or contractors may be collected, used and shared for:
  - Recruitment and staffing, including evaluation of skills and job placement,
  - Hiring decisions, including negotiation of compensation, benefits, relocation packages, etc.,
  - Determining an individual's eligibility to work and assisting with work permits or visas,
  - Risk management, including background checks, vetting and verification, and
  - Our Business Purposes (defined below).
  
- (b) Personal Data pertaining to *current* employees and contractors may be collected, used and shared for:
  - Staffing and job placement, including scheduling and absence management,
  - Administration of compensation, insurance and benefits programs,
  - Time and attendance tracking, expense reimbursement, other workplace administration and facilitating relationships within **Betapoint**,
  - IT uses, such as managing our computers and other assets, providing email and other tools to our workers,
  - Diversity programs,
  - Health and wellness programs and accommodating disabilities,
  - Occupational health and safety programs (including required reporting, disaster and pandemic planning, and incident management),

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- Talent and performance development, skills management and training, performance reviews (including customer surveys), engagement surveys, and recognition and reward programs,
  - HR support services, such as responding to inquiries, providing information and assistance, and resolving disputes,
  - Risk management, including employee and premises monitoring,
  - Providing employment and income verification,
  - As requested by individuals, and
  - Business Purposes.
- (c) Personal Data pertaining to *former* employees and contractors may be collected, used and shared for:
- Re-employment,
  - Administration of compensation, insurance and benefits programs,
  - For archival and recordkeeping purposes,
  - Providing employment and income verification,
  - As requested by individuals, and
  - Business Purposes.
- (d) Personal Data pertaining to individuals whose information is provided to **Betapoint** in the course of HR management (such as information pertaining to employees' family members, beneficiaries, dependents, emergency contacts, etc.) may be collected, used and shared for:
- Administration of compensation, insurance and benefit programs,
  - Workplace administration,
  - To comply with child support orders or garnishments,
  - To maintain internal directories, emergency contact lists and similar records, and
  - Business Purposes.

**Business Purposes** means the following purposes for which Personal Data may be collected, used and shared:

- Identity and credential management, including identity verification and authentication, issuing ID card and badges, system administration and management of access credentials,
- Security, loss prevention, information security and cybersecurity,
- Legal and regulatory compliance, including without limitation all uses and disclosures of Personal Data that are required by law or for compliance with legally mandated policies and procedures, such as anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines, and other processing in connection with the establishment and defence of legal claims,
- Corporate audit, analysis and consolidated reporting,
- To enforce our contracts and to protect **Betapoint**, our workers, our clients and their employees and the public against injury, theft, legal liability, fraud or abuse, to people or property,
- As needed to de-identify the data or create aggregated datasets, such as for consolidating reporting, research or analytics,
- Making back-up copies for business continuity and disaster recovery purposes, and other IT support, debugging, security, and operations.
- For the analysis and improvement of technical and organizational services, operations, and similar matters; and
- As needed to facilitate corporate governance, including mergers, acquisitions and divestitures.

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## 1.2. Categories of Personal Data

This chart describes the categories of Personal Data that **Betapoint** may collect in connection with its employment and contractual work relationships. Note, all Personal Data may be used and disclosed in connection with our Business Purposes.

Category of PI and Representative Data Elements	Common Purposes for Collecting and Sharing the PI
<p><b>Contact Data</b></p> <ul style="list-style-type: none"> <li>• Honorifics and titles, preferred form of address</li> <li>• Mailing address</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Mobile number</li> <li>• Social media or communications platform usernames or handles</li> </ul>	<p>We use your Contact Data to communicate with you by mail, email, telephone or text about your employment, including sending you work schedule information, compensation and benefits communications and other company information.</p> <p>Contact Data is also used to help us identify you and personalize our communications, such as by using your preferred name.</p>
<p><b>Identity Data</b></p> <ul style="list-style-type: none"> <li>• Full name, nicknames or previous names (such as maiden names)</li> <li>• Date of birth</li> <li>• Language</li> <li>• Company ID number</li> <li>• Company account identifiers and passwords</li> <li>• Benefits program identifiers</li> <li>• System identifiers (e.g., usernames or online credentials)</li> </ul>	<p>We use your Identity Data to identify you in our HR records and systems, to communicate with you (often using your Contact Data) and to facilitate our relationship with you, for internal record-keeping and reporting, including for data matching and analytics, and to track your use of company programs and assets, and for most processing purposes described in this HR Privacy Notice, including governmental reporting, employment/immigration verification, background checks, etc.</p>
<p><b>Government ID Data</b></p> <ul style="list-style-type: none"> <li>• National ID number</li> <li>• Tax reference number</li> <li>• Driver's license number</li> <li>• Passport number</li> <li>• Other government-issued identifiers as may be needed for risk management or compliance (e.g., if you are a licensed professional, we will collect your license number)</li> </ul>	<p>We use your Government ID Data to identify you and to maintain the integrity of our HR records, enable employment verification and background screening, such as reference checks, license verifications, and criminal records checks, subject to applicable law, enable us to administer payroll and benefits programs and comply with applicable laws, such as reporting compensation to government agencies as required by law, as well as for security and risk management, such as collecting driver's license data for employees who operate company automobiles, professional license verification, fraud prevention and similar purposes .</p>

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	We may also use Government ID data for other customer business purposes, such as collecting passport data and secure flight information for employees who travel.
<b>Biographical Data</b> <ul style="list-style-type: none"> <li>• Resume or CV</li> <li>• Data from LinkedIn profiles and similar platforms</li> <li>• Education and degree information</li> <li>• Professional licenses, certifications and memberships and affiliations</li> <li>• Personal and professional skills and talents summaries (e.g., languages spoken, community service participation), interests and hobbies</li> <li>• Professional goals and interests</li> </ul>	<p>We use Qualification Information to help us understand our employees and for professional and personal development, to assess suitability for job roles, and to ensure a good fit between individuals' background and relevant job functions.</p> <p>We also use Qualification Information to foster a creative, diverse workforce, for coaching, and to guide our decisions about internal programs and service offerings.</p>
<b>Transaction and Interaction Data</b> <ul style="list-style-type: none"> <li>• Dates of Employment</li> <li>• Re-employment eligibility</li> <li>• Position, Title, Reporting Information</li> <li>• Work history information</li> <li>• Time and attendance records</li> <li>• Leave and absence records</li> <li>• Salary/Payroll records</li> <li>• Benefit plan records</li> <li>• Travel and expense records</li> <li>• Training plan records</li> <li>• Performance records and reviews</li> <li>• Disciplinary records</li> </ul>	We use Transaction and Interaction Data as needed to manage the employment relationship and fulfill standard human resources functions, such as scheduling work, providing payroll and benefits and managing the workplace (e.g. employment creation, maintenance, evaluation, discipline, etc.).
<b>Financial Data</b> <ul style="list-style-type: none"> <li>• Bank account number and details</li> <li>• Company-issued payment card information, including transaction records</li> <li>• Personal payment card information, if provided for reimbursement</li> <li>• Credit history, if a credit check is obtained (only done in limited circumstances)</li> </ul>	We use your Financial Data to facilitate compensation, (such as for direct deposits), expense reimbursement, to process financial transactions, and for security and fraud prevention.
<b>Health Data</b>	We use your Health Data as needed to provide health and wellness programs, including health insurance programs, and for

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<ul style="list-style-type: none"> <li>• Medical information for job placement</li> <li>• Medical information for leave and absence management, emergency preparedness programs</li> <li>• Dietary restrictions or information</li> <li>• Wellness program data</li> <li>• Information pertaining to enrolment and utilization of health and disability insurance programs</li> </ul>	<p>internal risk management and analytics related to our human resources functions, staffing needs, and other Business Purposes.</p>
<p><b>Device/Network Data</b></p> <ul style="list-style-type: none"> <li>• Device information from devices that connect to our networks</li> <li>• System logs, including access logs and records of access attempts</li> <li>• Records from access control devices, such as badge readers</li> <li>• Information regarding use of IT systems and Internet access, including metadata and other technically-generated data</li> <li>• Records from technology monitoring programs, including suspicious activity alerts</li> <li>• Data relating to the use of communications systems and the content of those communications</li> </ul>	<p>We use Device/Network Data for system operation and administration, technology and asset management, information security incident detection, assessment, and mitigation and other cybersecurity purposes. We may also use this information to evaluate compliance with company policies. For example, we may use access logs to verify employee attendance records. Our service providers may use this information to operate systems and services on our behalf, and in connection with service analysis, improvement, or other similar purposes related to our business and HR functions.</p>
<p><b>Audio/Visual Data</b></p> <ul style="list-style-type: none"> <li>• Photograph</li> <li>• Video images, videoconference records</li> <li>• Call centre recordings and call monitoring records</li> </ul>	<p>We may use Audio/Visual Data for general relationship purposes, such as call recordings used for training, coaching or quality control.</p>
<p><b>Inference Data</b></p> <ul style="list-style-type: none"> <li>• Performance reviews</li> <li>• Results of tests related to interests and aptitudes</li> </ul>	<p>We use inferred and derived data to help tailor professional development programs and to determine suitability for advancement or other positions. We may also analyse and aggregate data for workforce planning. Certain inference data may be collected in connection with information security functions, e.g. patterns of usage and cybersecurity risk.</p>
<p><b>Compliance and Demographic data</b></p> <ul style="list-style-type: none"> <li>• Diversity information</li> </ul>	<p>We use Compliance and Demographic Data for internal governance, corporate ethics programs, institutional risk management, reporting, demonstrating compliance and</p>

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<ul style="list-style-type: none"> <li>• Employment eligibility verification records, background screening records, and other record maintained to demonstrate compliance with applicable laws, such as payroll tax laws, et al.</li> <li>• Occupational safety records and worker's compensation program records</li> <li>• Records relating to internal investigations</li> <li>• Records of privacy and security incidents involving HR records, including any security breach notifications</li> </ul>	<p>accountability externally, to evaluate the diversity of our staff, and as needed for litigation and defence of claims.</p>
<p><b>Protected Category Data</b></p> <p><b>Sensitive Personal Data</b></p> <p>Personal Data that is subject to additional restrictions under POPIA, e.g. Personal Data revealing racial or ethnic origin, religious or philosophical beliefs, trade union membership, biometric data, health information, or information relating to sexual orientation.</p>	<p>We use Sensitive Personal Data and Protected Category Data only as strictly necessary for the purpose it is collected with your knowledge, and consent if required by law (e.g. health information on a health insurance benefits application), and as needed to facilitate the employment relationship, to complete consumer/background check reports, and for compliance and legal reporting obligations.</p>

## 1.3. Categories of Sources of Personal Data

We collect Personal Data from various sources, which vary depending on the context in which we process that Personal Data.

- **Data you provide us** – We will receive your Personal Data when you provide them to us, when you apply for a job, complete forms, or otherwise direct information to us.
- **Data we collect automatically** – We may also collect information about or generated by any device you have used to access internal IT services, applications, and networks.
- **Data we receive from Service Providers** – We receive information from service providers performing services on our behalf.
- **Data we create or infer** – We (or third parties operating on our behalf) create and infer Personal Data such as Inference Data based on our observations or analysis of other Personal Data processed under this Privacy Notice, and we may correlate this data with other data we process about you. We may combine Personal Data about you that we receive from you and from third parties.

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## 1.4. Disclosure of Personal Data

We generally process HR Personal Data internally; however, it may be shared or processed externally by third party service providers, when required by law or necessary to complete a transaction, or in other circumstances such as:

- Our affiliates
- Service providers, vendors, and similar data processors that process Personal Data on **Betapoint's** behalf (e.g., analytics companies, financial analysis/budgeting, trainings, benefits administration, payroll administration, etc.).
- To prospective seller or buyer of such business or assets in the event **Betapoint** sells or buys any business or assets.
- To future **Betapoint** affiliated entities, if **Betapoint** or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its employees will be one of the transferred assets.
- To government agencies or departments, employee unions, or similar parties in connection with employment related matters.
- To any public authority in relation to national security or law enforcement requests, if **Betapoint** is required to disclose Personal Data in response to lawful requests by public authority.
- To any other appropriate third party, if **Betapoint** is under a duty to disclose or share your Personal Data in order to comply with any legal obligation or to protect the rights, property, or safety of **Betapoint**, our employees, customers, or others.

## 1.5. Data Administration

### 1.5.1. Security

**Betapoint** requires that Personal Data be protected using technical, administrative, and physical safeguards, as described in our various security policies. **Betapoint** staff must follow the security procedures set out in applicable security policies at all times.

### 1.5.2. Retention and Disposal

**Betapoint** keeps Personal Data only for the amount of time it is needed to fulfill the legitimate business purpose for which it was collected or to satisfy a legal requirement. **Betapoint** staff must follow any applicable records retention schedules and policies and destroy any media containing Personal Data in accordance with applicable company policies.

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