

POPIA PRIVACY & CANDIDATE INFORMATION POLICY

Precision Meets People

Document	THE-POPIA-001	Version	1.0
Effective Date	September 2026	Review Date	September 2027
Information / Privacy Officer	Lorraine Kruger	Contact	info@thehumanedgerecruit.com
Website	www.thehumanedgerecruit.com	Telephone	+27 21 979 5891

1. Purpose and Scope

The Human Edge ("THE") is a specialist recruitment service. This policy explains how THE collects, uses, stores, shares, protects and disposes of personal information in the course of recruitment and related business activities. It is intended to support compliance with the Protection of Personal Information Act 4 of 2013 (POPIA) and applies to candidates, work seekers, clients, prospective clients, referees, service providers and other persons whose personal information THE processes.

THE is powered by EHI Africa (Pty) Ltd. The contracting legal entity for a particular assignment or service will be identified in the applicable proposal, terms of business or agreement.

2. Our Privacy Commitment

THE respects the privacy of candidates and clients and processes personal information responsibly, transparently and only for legitimate recruitment, business and legal purposes. THE does not sell or rent personal information. Personal information is not circulated indiscriminately and access is restricted to persons who require it for authorised business purposes.

3. Personal Information We May Collect

Depending on the nature of the engagement, THE may collect information including:

- Identity and contact information, including name, telephone number, email address, location and, where necessary, identity information.
- CV/resume information, employment history, job titles, responsibilities, skills, experience, professional registrations, qualifications and training.
- Salary/remuneration information, availability, notice period, location preferences, work-authorisation information and career preferences.
- Information provided during interviews, assessments, correspondence and recruitment discussions.
- References, credential and qualification verification information and other background-check information where relevant and lawfully authorised.
- Client and prospective-client contact details, job specifications, organisational information and recruitment requirements.
- Information obtained from lawful public or professional sources, referrals or third parties where appropriate for recruitment purposes.
- Technical information generated through THE's website or business systems where applicable.

THE seeks to collect information that is adequate, relevant and not excessive for the purpose for which it is required.

4. How Information Is Collected

- Directly from candidates, clients, referees and service providers by email, telephone, forms, meetings, interviews or other correspondence.
- Through CV/resume submissions, applications and candidate registration or engagement.
- Through professional networking platforms, lawful public sources, referrals and recruitment sourcing activities.

- Through recruitment technology and approved business systems used to manage candidate and client relationships.

5. Purposes for Processing

THE may process personal information for legitimate recruitment and business purposes, including:

- Identifying, sourcing, assessing and interviewing potential candidates.
- Matching candidate experience and capability to suitable vacancies or potential opportunities.
- Confirming a candidate's interest in and suitability for a particular opportunity.
- Preparing candidate profiles and presenting suitable candidates to prospective employers in accordance with THE's recruitment process.
- Conducting or arranging reference, qualification, credential or other relevant verification checks where authorised and appropriate.
- Communicating with candidates and clients regarding recruitment assignments and related services.
- Managing client relationships, proposals, terms of business, placements, guarantees, invoicing and administration.
- Maintaining recruitment records, talent pools and candidate/client relationship information for legitimate recruitment purposes.
- Meeting legal, regulatory, contractual, audit, security and risk-management obligations.

6. Candidate Representation and Disclosure to Clients

THE does not treat receipt of a CV/resume as unrestricted authority to distribute a candidate's personal information. Before identifiable candidate information is submitted to a client for a specific opportunity, THE will establish the candidate's interest and obtain the necessary authority or consent in accordance with its recruitment process.

Where appropriate, THE may first discuss a candidate's profile or provide non-identifying information without disclosing information that identifies the candidate.

Candidate information supplied to a client is confidential and is provided for the relevant recruitment purpose. Clients are expected to handle that information lawfully and securely.

7. Verification and Background Information

Where verification is relevant to an assignment, THE may request or verify qualifications, professional registrations, employment history, references or other credentials. Verification or background checks will be conducted only where appropriate and on a lawful basis, with the necessary candidate authority where required.

THE may use reputable third-party verification providers. Information shared with such providers will be limited to what is reasonably necessary for the authorised check.

8. Lawful Processing and Consent

THE processes personal information on an appropriate lawful basis under POPIA. Consent will be obtained where consent is required or is the appropriate basis for the processing concerned. Where processing is supported by another lawful basis, THE will not represent consent as the only basis for processing.

Where a person has given consent, that consent may be withdrawn, subject to legal or legitimate grounds that may permit or require continued processing of certain information.

9. Special Personal Information

THE will process special personal information only where permitted by law and where it is relevant and necessary for a legitimate recruitment or legal purpose. THE does not require candidates to provide unnecessary sensitive information.

10. Sharing Personal Information

THE may disclose personal information only where reasonably necessary and lawful, including to:

- Prospective employers/clients in connection with a recruitment assignment and in accordance with the candidate-representation process.

- Authorised verification, technology, professional or other service providers supporting THE's recruitment operations.
- Regulators, courts, law-enforcement bodies or other authorities where disclosure is legally required.
- Professional advisers where necessary for legal, accounting, compliance or risk-management purposes.

THE does not charge candidates or work seekers a recruitment, registration or placement fee.

11. Electronic Systems, Access and Security

THE operates predominantly electronically and uses approved business systems, including recruitment and communication platforms such as Zoho Recruit and Microsoft Teams, as applicable. Candidate and client information is stored and handled electronically with access restricted according to business need.

THE applies reasonable technical and organisational safeguards designed to protect personal information against loss, misuse, unauthorised access, alteration, disclosure or destruction. These may include password controls, access restrictions, device and system security, staff confidentiality obligations and appropriate security practices.

No security system can guarantee absolute protection. Suspected loss, unauthorised access or compromise of personal information must be reported internally without delay so that it can be assessed and managed.

12. Retention and Disposal

Personal information will not be retained longer than is reasonably necessary for the purpose for which it was collected, unless retention is required or permitted by law, contract, a legitimate business need or for the establishment, exercise or defence of legal rights.

When information is no longer required, THE will take reasonable steps to delete, destroy, de-identify or otherwise securely dispose of it. Candidates may request deletion or destruction of information, subject to lawful grounds for continued retention.

13. Cross-Border Recruitment and Transfers

THE may support recruitment assignments involving candidates or clients outside South Africa. Where personal information is transferred across borders, THE will take reasonable steps to ensure that the transfer is handled in accordance with POPIA and that appropriate protection is in place.

Where a candidate is being considered for an international opportunity, the candidate will be informed before identifiable information is submitted to an overseas prospective employer.

14. Direct Marketing and Recruitment Communications

THE may contact candidates about relevant career opportunities and may communicate with clients or prospective clients about recruitment services where lawful. Recipients may request that marketing communications stop. Recruitment communications relating to an active engagement or requested service may continue where necessary for that purpose.

15. Data Subject Rights

Subject to POPIA and other applicable law, a person may:

- Ask whether THE holds personal information about them.
- Request access to personal information held about them.
- Request correction or updating of inaccurate or incomplete information.
- Request deletion or destruction where legally appropriate.
- Object to certain processing where the law provides a right to object.
- Withdraw consent where processing is based on consent.
- Lodge a complaint concerning the processing of personal information.

THE may take reasonable steps to verify the identity of a person making an information request before releasing or changing personal information.

16. Candidate and Client Responsibilities

Candidates and clients should provide information that is accurate and should notify THE when material information changes. A client providing personal information about another person should ensure that it is lawfully entitled to provide that information for the intended purpose.

17. Third-Party Platforms and Websites

THE may use or link to third-party platforms as part of its business operations. Those platforms may have their own privacy practices. THE will use reasonable care when selecting service providers, but third-party platforms remain responsible for their own systems and privacy terms.

18. Information / Privacy Officer and Requests

Questions, access/correction requests, privacy concerns or requests relating to personal information may be directed to:

Information / Privacy Officer	Lorraine Kruger
Email	info@thehumanedgerecruit.com
Telephone	+27 21 979 5891
Website	www.thehumanedgerecruit.com

19. Complaints

A person who believes that THE has processed personal information unlawfully is encouraged to raise the matter with THE's Information / Privacy Officer so that it can be investigated and addressed.

A data subject may also lodge a complaint with the Information Regulator (South Africa). Current contact details for the Information Regulator should be obtained from the Regulator's official channels when required.

20. Policy Review and Updates

This policy will be reviewed at least annually and may be updated earlier where THE's recruitment processes, systems, legal obligations or business operations materially change. The current approved version supersedes earlier THE privacy-policy versions.

Approved by: Lorraine Kruger

Signature: 

Date: 01 September 2026