



Data Privacy Policy

Kaha Data Privacy Policy

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Supplied by: KAHA (11 San Juan Avenue, Contantia Hills, Cape Town, South Africa, 7806)

Kaha Data Privacy Policy

The purpose of Kaha Management's ('Kaha') privacy notice is to inform you about how we collect, use, share and protect your personal information based on your interactions with Kaha, our team members or through one of our product offerings.

Lawful Basis for Processing your Data.

As Kaha and as an Operator of your information we comply with the provisions of the Protection of Personal Information Act, 4 of 2013 ("POPIA") and GDPR data protection regulations. We are committed to informing you about what we use your data for, what your rights to the data you give us are, and to tell you about who we are.

When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- consent: where you have given us clear consent for us to process your personal information for a specific purpose
- legitimate interests: where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information, which overrides our legitimate interests)

Kaha collects, uses, stores, and otherwise processes personal data where necessary to provide a service which you request, where necessary to comply with a legal obligation, and where necessary pursuant to Kaha's legitimate interests and where these interests are not overridden by your data protection rights. For example, Kaha has a legitimate interest in ensuring the security and integrity of its systems and facilities and in ensuring that relevant information for the conduct of our business is available across the organisation. Kaha may also process your personal data where you have given consent.

For example, when you apply for a job at Kaha at chat@kaha.co.za, you consent to Kaha using your personal information for the purposes of the hiring process. Where Kaha asks for consent, you are free to withhold or revoke this consent by sending an email request to dataprotection@kaha.co.za.

Your rights

As a data subject you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations

- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

The above rights are not absolute rights and may be limited where it is necessary to protect the fundamental rights, human rights, or public and private interests of others. Kaha reserves the right, where permitted by law, to verify your identity. In some circumstances, Kaha processes personal data on behalf of its clients and subject to the control and instructions of its clients. If you believe Kaha may have personal data about you due to services Kaha is providing or has provided to a Kaha client with whom you have a relationship, it may not be possible for Kaha to respond to your request. In that circumstance, it would be more appropriate for you to direct your request to the Kaha client with whom you have the relationship.

If you would like to exercise any of those rights, please:

- email, or write to our Data Protection/ Information Officer whose contact details are listed below.
- let us have enough information to identify you
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill)

Kaha Data Protection/ Information Officer

Address: 11 San Juan Avenue, Contantia Hills, Cape Town, South Africa, 7806

Email: dataprotection@kaha.co.za

What kind of personal information does Kaha collect online?

Kaha collects the following personal data from our clients and applicants: email addresses, names of contact persons, contact telephone numbers, information required for accounting and invoicing purposes, country of operation, name of organisation or person from whom data is being collected and physical addresses.

In the course of our business, Kaha may collect this personal data about you from the following sources:

- From job applications or other forms pertaining to the hiring process, we receive from you,
- From public sources such as vendors/clients who may provide personal data,
- Where Kaha processes personal data on behalf of its clients.

How does Kaha safeguard the personal data we collect?

Kaha maintains electronic and procedural safeguards designed to protect your personal data from unauthorized access or intrusion. Kaha limits access to the personal data only to those employees, contractors and agents who need such access in connection with providing products or services to you, to clients with whom you have a relationship, or for other

legitimate business purposes such as hiring employees. Some of these measures may include encryption, physical access security, user access security measures or other technologies and tools which Kaha believes may enhance the security of its systems and facilities. However, Kaha has no responsibility or liability for the security of information you provide to Kaha transmitted via the Internet. Kaha understands that protecting consumer privacy is an integral part of protecting our relationship with our clients or future colleagues.

How does Kaha use the personal data collected?

Kaha uses the data we collect to assist us in providing products or services to you, to our clients, to provide you with information about those products or for other legitimate business purposes.

- Kaha may disclose your personal data if regulatory obligations require Kaha to do so, if Kaha determines such disclosure is legally advisable or necessary in order to protect Kaha' rights, the rights of others, or in order to prevent harm;
- We will only retain your data for as long as is necessary and in accordance with applicable law. We set out our retention periods within our company policies. In Kaha's case, we deem 48 months an acceptable amount of time to keep your consent and after such time will reseek your permission to communicate with you.

With whom does Kaha share the personal information we collect?

Kaha houses our data in three main industry standard, data housing systems and they are:

- WordPress
- Workable
- TestGorilla

These systems allow us to have the utmost confidence that your data is secure and helps us makes sure that we are not sending you communications regarding subjects that you are not involved in. Data Processor Agreements are in place with our service providers and are designed to help safeguard your privacy rights.

International Data Transfers

Kaha may need to store and process your personal data in countries other than the country in which it is collected. Where these countries have different data protection laws, Kaha will take measures to ensure your personal data remains protected.

Kaha' use of Cookies on our website

A cookie is a small text file which is placed onto your device (e.g., computer, smartphone or other electronic device) when you use our website.

Necessary cookies

We use 'strictly necessary' cookies on our website. These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or

alert you about these cookies, but some parts of the site will not work then. These cookies do not store any personally identifiable information.

Functional and Performance cookies

These are cookies that are set up to improve the functionality of the website. We process information collected by these cookies in a collective and anonymous way in order to optimize our services and the Website for the needs and preferences of the Users.

Consent to use cookies and changing settings

We will ask for your permission (**consent**) to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested.

You can withdraw any consent to the use of cookies or manage any other cookie preferences by clicking on the cookie settings button at the bottom right of any page on our site. This will open our Cookie Preference Centre. You can then toggle the sliders as appropriate under each cookie type. It may be necessary to refresh the page for the updated settings to take effect.

Online Privacy Notice Updates

This Online Privacy Notice is subject to change. Please review this notice periodically. Any changes will become effective when we post the revised notice on the site.

Complaints

You have a right to complain about our use of your information if you think your rights have been infringed by Kaha in processing your personal information. If we do not respond to your full satisfaction, then your complaint can be directed to the Information Regulators' Office.

The contact details are: The Information Regulator (South Africa)
33 Hoof Street
Forum III, 3rd Floor Braampark
P.O Box 31533
Braamfontein, Johannesburg, 2017
Complaints email: complaints.IR@justice.gov.za