

WEBTONIC – CANDIDATE PRIVACY NOTICE

Document Title:	Webtonic Candidate Privacy Notice
Document ID:	PRIV-POL-IO-005
Version:	1
Owner:	Information Officer
Approved By:	Finance Director
Effective Date:	2026-02-25
Next Review Date:	2027-02-01
Classification:	External

1. Purpose / Introduction

Webtonic Online Solutions (Pty) Ltd (“Webtonic”, “we”, “us”, “our”) is committed to protecting the privacy, confidentiality, and security of Personal Information belonging to our current and prospective employees.

This Candidate Privacy Notice explains how we collect, use, process, store, disclose, and protect Personal Information relating to employees in accordance with:

- The Protection of Personal Information Act 4 of 2013 (“POPIA”), and
- The General Data Protection Regulation (EU) 2016/679 (“GDPR”), where applicable.

This Notice must be read together with Webtonic’s Master Privacy Notice, Information Security Policy, and related internal policies.

2. Definitions

For purposes of this Privacy Notice:

Personal Information means information relating to an identifiable natural person and, where applicable, an identifiable juristic person, as defined under POPIA.

Processing means any operation performed on Personal Information, including collection, storage, use, disclosure, transmission, restriction, or deletion.

Candidate means any individual who applies for employment, internship, consultancy, or engagement with Webtonic, whether directly or through a third party.

3. Scope

This Notice applies to Personal Information processed in connection with:

- Recruitment advertising
- Application submission
- Interview and assessment processes
- Background and reference checks
- Pre-employment screening
- Talent pipeline retention

Successful candidates become employees and are thereafter subject to the Employee Privacy Notice.

4. Information We Collect

We may collect and process the following categories of Personal Information:

4.1 Identification Information

- Full name
- Identity number or passport number
- Date of birth
- Address
- Contact details
- Work eligibility documentation

4.2 Professional and Employment Information

- Curriculum vitae (CV) or resume
- Qualifications and certifications
- Employment history
- Skills and competencies
- Interview notes and assessments

4.3 Background Screening Information (where applicable and lawful)

- Criminal record checks
- Reference checks
- Verification of qualifications

4.4 Technical and Application Data

- IP address (where applying online)
- Device and browser information
- Application tracking system records

4.5 Special Personal Information (where necessary and lawful)

- Disability information (for accommodation purposes)
- Health information (where relevant to job requirements)

We process only Personal Information that is necessary, relevant, and proportionate to recruitment purposes.

5. Purpose of Processing

Candidate Personal Information is processed for the following purposes:

- Assessing suitability for employment
- Communicating throughout the recruitment process
- Verifying qualifications and experience
- Conducting background checks (where permitted by law)
- Maintaining a talent pool for future opportunities (where permitted)
- Complying with legal obligations

- We do not use candidate information for unrelated purposes.

6. Lawful Basis for Processing

Processing is based on one or more of the following lawful grounds:

- Steps necessary prior to entering into an employment contract
- Compliance with legal obligations
- Legitimate business interests in recruitment and workforce planning
- Consent, where required (e.g., criminal checks or talent pool retention)

Special Personal Information is processed only where permitted under applicable legislation or with explicit written consent where required.

7. Automated Decision-Making

Webtonic does not make recruitment decisions based solely on automated processing or profiling.

All hiring decisions involve human review.

8. Sharing and Disclosure

Candidate Personal Information may be shared with:

- Recruitment agencies
- Background screening providers
- Interview panel members
- IT system providers
- Professional advisers
- Regulatory authorities (where required)

All third parties are required to:

- Maintain confidentiality
- Implement appropriate technical and organisational safeguards
- Process information solely for legitimate recruitment purposes

9. Cross-Border Transfers

Where Personal Information is transferred outside South Africa or the European Economic Area, such transfers will occur only where:

- The recipient country provides adequate protection; or
- Appropriate contractual safeguards are implemented; or
- The transfer is otherwise permitted by applicable law.

10. Security Safeguards

Webtonic implements appropriate technical and organisational measures to protect employee Personal Information, including:

- Role-based access controls
- Secure HR systems
- Encryption where appropriate
- Confidentiality obligations

- Incident response procedures

11. Retention

Candidate Personal Information is retained:

- For the duration of the recruitment process; and
- For a limited period thereafter in accordance with Webtonic's Records Retention Schedule.

Unsuccessful candidates' information may be retained for up to 12 months for future opportunities, unless a shorter period is required by law or the candidate objects. Candidates may request deletion at any time, subject to legal limitations.

12. Data Subject Rights

Subject to applicable law, candidates have the right to:

- Access their Personal Information
- Request correction
- Request deletion (where legally permissible)
- Object to certain processing
- Withdraw consent (where consent was relied upon)
- Lodge a complaint with a supervisory authority

Requests may be submitted to the Information Officer at info@webtonic.co.za. Identity verification may be required before requests are processed.

13. Incident Reporting

Any suspected or actual unauthorised access, disclosure, or loss of candidate Personal Information will be managed in accordance with Webtonic's Incident Response procedures and applicable law.

14. Complaints and Contact Details

If you have concerns regarding the processing of your Personal Information, you may contact:

Information Officer

Webtonic Online Solutions (Pty) Ltd

Email: info@webtonic.co.za

Under POPIA, you may lodge a complaint with the Information Regulator of South Africa.

Under GDPR, you may lodge a complaint with the relevant supervisory authority in your jurisdiction.

15. Review and Updates

This Employee Privacy Notice may be updated from time to time. Employees will be notified of material changes.

The most current version will be provided to candidates at the time of application and is available upon request.