



# **CEAPP (Pty) Ltd**

## **PRIVACY NOTICE**

CEApp (Pty) Ltd

Web: [ceapp.co.za](http://ceapp.co.za) and [rplonline.co.za](http://rplonline.co.za)

Email: [info@ceapp.co.za](mailto:info@ceapp.co.za)

Contact: 083 682 1498 or 082 541 8047

PO Box 1679, Brooklyn Square, Pretoria, Gauteng, South Africa, 0075

## 1. OUR COMPANY

### 1.1. Company registration details

<b>Company name:</b>	CEAPP (Pty) Ltd
<b>Registration number:</b>	K2019514678

### 1.2. General contact details

<b>Postal address:</b>	PO Box 1679, Brooklyn Square, Pretoria, 0075
<b>Physical address:</b>	The Village Block D, Corner Oberon and Glenwood Roads, Faerie Glen, Pretoria, 0043
<b>Email address:</b>	info@ceapp.co.za
<b>Telephone number:</b>	083 682 1498 or 082 541 8047
<b>Website:</b>	<a href="http://www.ceapp.co.za">www.ceapp.co.za</a> and <a href="http://www.rplonline.co.za">www.rplonline.co.za</a>

### 1.3. Contact details of the information officer

<b>Information officer name:</b>	Jean van Vuuren
<b>Role:</b>	Director
<b>Postal address:</b>	PO Box 1679, Brooklyn Square, Pretoria, 0075
<b>Physical address:</b>	128 Izaak Street, Kilner Park X1, Pretoria, 0186
<b>Email address:</b>	jean@ceapp.co.za
<b>Telephone number:</b>	083 682 1498
<b>Website:</b>	<a href="http://www.ceapp.co.za">www.ceapp.co.za</a> and <a href="http://www.rplonline.co.za">www.rplonline.co.za</a>

## 2. PURPOSE OF THIS DOCUMENT

This Privacy Notice explains how CEApp uses, processes and stores personal information when services are rendered to clients and candidates in compliance with the Protection of Personal Information Act (POPIA), and other privacy laws and regulations.

This document applies to all CEApp' online systems, including the company's public website as well as current and future developed electronic systems assisting the company in doing business.

We recognise that you have rights as a data subject and we have an obligation to uphold and protect these. The aim of this notice is to outline how we maintain these rights. In particular, the document outlines:

- How we collect and process your information
- Why we do it
- How you can exercise your rights
- Who to contact in the event you are unhappy with the manner in which we engage with your information.

### 3. KEY DEFINITIONS

Term	Definition
Data	Data are the units of information, numeric or otherwise, that we collect as part of our services and product offerings.
Information	Information is the summarisation of data and refers to all of the knowledge obtained from the data we collect as part of our services and product offerings.
Child/Children	A child means a natural person, younger than 18 years, who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning themselves.

### 4. REFERENCE DOCUMENTATION

This Privacy Notice is in support of, or is supported by the following documentation:

- Constitution of the Republic of South Africa, 1996 (Act 108 of 1996), Chapter 2: Bill of Rights
- Children's Act (Act 38 of 2005)
- Promotion of Access to Information Act (Act 2 of 2000) (PAIA)
- Protection of Personal Information Act (Act 4 of 2013) (POPIA)
- Health Professions Act (Act 56 of 1974), Ethical rules of conduct for practitioners registered under the Health Professions Act, 1974: Annexure 12, Rules of conduct pertaining specifically to the profession of Psychology.

### 5. YOUR INFORMATION RIGHTS

Your right	What it means
Right to be informed	We must be transparent in how we collect and use your personal data information. This excludes company intellectual property access.
Right of access	You have the right to access your personal data which you provided when you did your assessment.
Right to rectification	If the information we hold on you is inaccurate or incomplete, you can request us to correct this. You will not have the right to make changes to information you submitted as part of an assessment process and which you have declared as accurate, truthful and correct, as this will undermine the accuracy, truthfulness and value of the assessment outcomes, reports and consequent decisions.
Right to erasure	You can request that we delete or remove personal data where there is no compelling reason for us to continue processing your data.
Right to restrict processing	You have the right to request that we cease the processing of your data, if: <ul style="list-style-type: none"><li>• You consider it inaccurate or incomplete</li></ul>

	<ul style="list-style-type: none"> <li>• Where you object to processing and we are considering whether we still have a legitimate interest to process it</li> <li>• Where we don't need the data for the original reason we collected it, but may need it to support a legal claim.</li> </ul>
Right to data portability	Where you have consented to our processing of your data, or where the processing is necessary for us to deliver on a contract, you can request a copy of that data to be provided to a third party in electronic form.
Right to object	<p>You have the right to object to our processing under certain circumstances. For example, you can object to:</p> <ul style="list-style-type: none"> <li>• Direct marketing (not applicable to CEApp and its related businesses)</li> <li>• Processing for purposes of scientific research and statistics which may reveal your identity.</li> </ul>

Please read the notice carefully to ensure that you understand our views and practices regarding your personal information.

We will take all reasonable steps to prevent unauthorised access to, or disclosure of any personal information without explicit consent of the data subject or any other parties involved.

## 6. THE TYPES OF PERSONAL INFORMATION WE COLLECT

Before any data or information about you is requested, captured into our systems and processed, we require you to provide your informed consent. You have the right to decline, however, failure to provide consent will exclude you from any process or service we offer.

We collect data and information to enable our services to all of our users. We only collect data and information that is overtly supplied by each candidate (data subject).

This includes the following:

Type of data and information	Examples
Biographical/identification:	Name, email address, contact information, personal identification number, date of birth, gender, ethnic/social origin, age, social economic grouping, disability status, home address, etc.
Reason for participation:	You are asked to state/confirm the reason for your participation in the particular process: selection, development, application for a broader process, course evaluation, competency evaluation, assistance for personal representation, etc.

Assessment/test:	Views, preferences, motives, talents, values, competencies, interests, behaviour in the workplace, etc. You will be required to provide a response to all of the questions within assessment and testing. If you do not provide a response, you may not be able to proceed with the relevant process.
Third party:	Next of kin, references, etc.

## 7. HOW WE USE THE INFORMATION WE COLLECT

We collect the data and information described above, to facilitate the services we provide to candidates and clients, and to comply with our contractual agreements and legitimate interests with candidates and clients.

We use the data and information that we collect from all of our assessment and testing services for billing as applicable, as well as for statistical and research purposes for which data and information is anonymized and processed in aggregate. Individual data and information that will make it possible to identify individuals is not used for statistical and research purposes.

We do not use the data and information collected from candidates for marketing purposes. Our marketing is strictly through social media channels as well as our own developed electronic and paper-based channels.

We will not give out your data and/or information to third parties for sales and marketing use.

## 8. WHEN CEAPP WILL COLLECT INFORMATION ABOUT YOU

Personal information may be collected by CEApp when you:

- Complete an assessment to which you consented to
- Contract us to make use of our services
- Voluntarily partake in a process which is set out to achieve a particular objective

## 9. INFORMATION WE SHARE WITH OTHERS

We share information with companies, organisations and consultants outside CEApp only if your explicit consent has been given.

We do not transfer data abroad, unless the contracted client and/or candidate is permanently based outside of the borders of South Africa. We will not transfer your data and/or information for any other purpose, but the reason you participated in the process in question.

## **10. STATEMENT REGARDING CHILDREN**

At CEApp, we are committed to comply with relevant legislature pertaining to all aspects of our business operations, products and service offerings.

According to POPIA, the information of children may not be processed unless a competent person has given consent.

According to the Bill of Rights and the Children's Act, an individual younger than 18 years is considered a child.

The Consultants employed in CEApp are, by virtue of their registration with the Health Professions Council of South Africa (HPCSA), as Psychometrists and/or Psychologists, bound to comply with the relevant restrictions and policies laid down by the Council. In particular, the Health Professions Act (Act 56 of 1974), Ethical rules of conduct for practitioners registered under the Health Professions Act, 1974: Annexure 12, Rules of conduct pertaining specifically to the profession of Psychology, is applicable. These rules regard an individual younger than 14 years old, to be a child, and practitioners bound by the rules should take special care when dealing with children aged 14 years and younger.

CEApp utilises tools and instruments for which the minimum required age is 16 years. We therefore require parental consent for candidates who are younger than 16 years old. Before we finalise consent of candidates who are older than 16 years, we have measures in place to ensure all candidates have full understanding and comprehension of the process he or she has given their consent to.

## **11. SECURITY MEASURES**

The following technical, professional, and security measures are implemented by CEApp, to ensure the confidentiality and protection of personal information and data:

- Candidate information is only accessible to authorised CEApp Consultants.
- Authorised clients are given access to administrative portals and sites by means of usernames and passwords to access relevant information.
- All passwords are encrypted.
- We do not partake in using client or other user email addresses and cell phone numbers as methods to sell or market products or services. Email addresses and cell phone numbers are purely used to communicate information regarding services rendered.
- Our data is encrypted in transit, at rest, and when backed up.
- Our data is stored in at secure data server centres, located in Samrand, Centurion.
- Data used for statistics and research purposes is anonymised before it is processed, and it is and processed in aggregate only for these purposes.
- The personal data of clients and candidates, including biographical and organisation specific information, is captured via the completion of online forms and non-automated means by organisational practitioners, consultants,

administrators and assessment candidates. The collection of personal data from other sources does not prejudice the legitimate interest of the data subject.

- All users of our products and services need to comply with the obligations imposed by law on the responsible party. The responsible party thus bears the burden of proof for the data subject's consent to access personal information. If the data subject objects to the processing of personal information, the responsible party needs to comply.
- As the responsible party, CEApp we take all reasonable steps to ensure that the information captured is complete, accurate and not misleading.
- Clients and consultants, making use of our products in the rendering of their services, are obliged to take the responsibility to obtain and store, written permission from all assessment candidates or data subjects to access and process their personal information.
- In the case of an assessment candidate being a child, written consent is obtained from a responsible parent or guardian before capturing any personal information or processing any data.
- Assessment and test results are captured and submitted online and stored at secure data server centres, located in Samrand, Centurion.
- Unauthorised access to the assessment and data portals is prevented through the use of secure passwords allocated to each individual user.
- Online backups and antivirus services are conducted by Xneelo.
- Assessment and test results can only be accessed by authorised and professionally qualified and accredited Consultants in CEApp, as well as organisational practitioners and consultants, through the use of passwords.
- Users of our products and services need to ensure the confidentiality and security of their passwords to access CEApp systems and portals.

## **12. WHAT HAPPENS IF WE HAVE A SECURITY BREACH?**

Where we have reasonable grounds to believe that personal information has been accessed by unauthorised parties, we will notify the involved parties as soon as reasonably possible.

We will also take all necessary steps to ensure that unauthorised individuals do not obtain access to information.

## **13. SHARING YOUR PERSONAL INFORMATION WITH THIRD PARTIES**

CEApp will not disclose any personal information to third parties without the permission of the data subject involved, in terms of this Privacy Notice.

With your consent you agree that your information may be used as anonymised and aggregated personal information, and may be processed for the purposes of research and statistics.



All information provided to CEApp are done so on a voluntary basis and with the understanding that it will not be utilised for marketing purposes, or sold to a third party to be used for its sales and marketing undertakings.

Where law requires that we disclose your personal information, and we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a party to may be in breach of the terms, or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities, we are obliged to share personal information.

#### **14. CEAPP PAIA MANUAL**

Note: This privacy notice is intended to add to the CEApp PAIA manual, rather than to replace it. Please refer to the CEApp PAIA manual at this [link](#).

#### **15. CHANGES TO THIS PRIVACY NOTICE**

This Privacy Notice takes effect from 01 July 2021. We may change this Privacy Notice from time to time by posting a new version here, and the new version will become effective from the date set out in the new Privacy Notice.

#### **16. INFORMATION OFFICER CONTACT DETAILS**

We realise that you may have questions on how we store and process your data or you may want to change either the data we hold, subject to the provisions as per section 5 of this Privacy Notice, or how we communicate with you in future.

If you have given consent for processing, you are free to withdraw the consent. You can contact us at [info@ceapp.co.za](mailto:info@ceapp.co.za)

If you have any questions in respect of this Privacy Notice or would like to exercise your right as a data subject, you can contact our Information Officer at the email address above.

#### **17. HOW TO COMPLAIN TO THE INFORMATION REGULATOR**

CEApp' use of personal information is governed by PAIA and POPIA and the Information Regulator is responsible for making sure that CEApp comply with these laws. Complaints can be lodged with the Information Regulator.

Their details are as follows:

Physical address:	JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001
Complaints email:	<a href="mailto:complaints.IR@justice.gov.za">complaints.IR@justice.gov.za</a>



General enquiries email:	<a href="mailto:infoereg@justice.gov.za">infoereg@justice.gov.za</a>
Website:	<a href="https://www.justice.gov.za/infoereg/index.html">https://www.justice.gov.za/infoereg/index.html</a>

