



**Professional Sourcing (Pty) Ltd  
(Registration Number: 2005/027126/07)**

**MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO  
INFORMATION ACT 2 OF 2000 (“PAIA”)**

**AS AMENDED BY THE PROTECTION OF PERSONAL INFORMATION ACT,  
4 OF 2013**

**(“POPIA”)**

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Revision 2

**Professional Sourcing PAIA MANUAL**

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## **PRIVACY POLICY**

### **AN INTRODUCTION TO PAIA**

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The Promotion of Access to Information Act, 2000 ("PAIA") came into operation on 9 March 2001.

PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights.

PAIA sets out the requisite procedural issues attached to information requests, including the obligation to compile a PAIA Manual.

Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such body and stipulates the minimum requirements that the manual has to comply with.

Where a person is desirous of obtaining information from a private body, in terms of PAIA such request must be made in the format as prescribed and described under the private body's PAIA Manual, and following receipt of the request, such private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable.

## OUR PAIA MANUAL

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This Manual constitutes Professional Sourcing (Pty) Ltd.'s PAIA Manual.

This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"), which gives effect to everyone's Constitutional right to privacy and largely commenced on 1 July 2020.

POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information.

POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

For purposes of this Manual, we refer to ourselves as "Professional Sourcing (Pty) Ltd", "we", "us" or "our".

We have compiled this Manual to inform you of, and guide you through, the procedural and other requirements with which a PAIA or a POPIA request must comply.

This website, [www.prosourcing.co.za](http://www.prosourcing.co.za) is operated by Professional Sourcing (Pty) Ltd. We are a company registered in South Africa under company registration number: 2005/027126/07, and our registered office is at 1215 De Villebois Mareuil Drive, Moreleta Park, Pretoria East.

Protecting your privacy and personal data is important to us. In this regard, Professional Sourcing (Pty) Ltd has adopted a data protection policy which provides simplified legal basis for all databases and applications sharing personal data within the company.

We understand that you may be concerned about security and confidentiality of transacting over the Internet. We take the security of your personal information very seriously and take all reasonable steps to protect our computer network and systems against intrusion or any other form of attack or compromise.

While we take every effort to ensure that all information provided on this website is accurate and up to date, we take no responsibility for any error or omission relating to information provided on this website. In this regard, will not be liable for any loss or damage suffered by on the basis of your use of the website or reliance on the information provided on this website.

This Privacy Policy explains how we collect and use personal data obtained through the website, telephonically and/or by email.

## **HOW WE USE THE INFORMATION WE RECEIVE**

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We use the information we receive or collect:

- To be added to the content of our database, should your Resume be suited for a specific job opportunity available currently, or for future opportunities;
- To contact you with e-mail notifications or telephonically;
- To respond to a specific enquiry, you may have lodged telephonically, or sent by email.

No personally identifiable information, such as your name, address, or e-mail address, is automatically collected from your visit to Professional Sourcing (Pty) Ltd.'s website.

If you request information via email and supply Professional Sourcing (Pty) Ltd with your e-mail address or your name and address, you accept that this data will be used for the purpose of providing the requested information and that Professional Sourcing (Pty) Ltd may use this data in the future to provide other information about Professional Sourcing (Pty) Ltd that might be of interest to you. Please note that in order to process your query, your personal data may be captured on our database.

Professional Sourcing (Pty) Ltd may disclose user information in special cases when we have reasons to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference (either intentionally or unintentionally) with Professional Sourcing (Pty) Ltd rights or property, other users of the website, or anyone else who could be harmed by such activities.

Personally, identifiable information is never sold or leased to any third parties outside of Professional Sourcing (Pty) Ltd. We may share information provided by you with service providers we have retained to perform services on our behalf. In this case, the service provider is committed to use your data only for Professional Sourcing (Pty) Ltd purposes.

## **SECURITY**

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Security for all personally identifiable information is extremely important to us. Once we receive your transmission, we make our best efforts to ensure its security on our systems. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us.

## **CHANGES TO THIS PRIVACY POLICY**

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This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our online information practices. When changes are made to this Policy it will be posted to the website and the "last updated" date at the top of this policy will be revised. We also encourage users to periodically check this Policy to understand how Professional Sourcing (Pty) Ltd protects and uses your information.

## **CONSENT**

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By contacting Professional Sourcing via email or telephonically, you agree to the collection and use, consistent with applicable laws, of information available on or through your email or phone call (including your personally identifying information) by Professional Sourcing (Pty) Ltd.

By contacting Professional Sourcing (Pty) Ltd telephonically or via email, you agree to receive feedback on whether your personal information is applicable and will be listed on our database. Should you email your personal information, and it is not applicable or suited to the required standards, your personal information will not be kept on our database.

Should a change to our privacy policy occur, we will post those changes on this page so that you are always aware of the nature of the information we collect, how we use it, and the circumstances under which we disclose it.

Unless otherwise required or permitted by applicable law, we do not intend to use your personally identifiable information collected through the various ways of data collecting in ways not described here without first providing you the opportunity to agree with written consent that Professional Sourcing (Pty) Ltd is allowed to do so, except if the information is required by law.

## **CONTACT:**

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If you have any questions about this privacy policy, the practices of our company, or your dealings with our company, you can contact us on [reception@prosourcing.co.za](mailto:reception@prosourcing.co.za).

Information provided by you via general e-mail inquiries to us such as your e-mail address is used only to respond to your inquiries in the ordinary course of business and is never shared with third parties unless agreed so, in writing, by the sender.

Our general contact details are as follows:

Physical address: 1215 De Villebois Mareuil Drive, Moreleta Park, Pretoria East

Tel: 012 991 5854

Email address: [reception@prosourcing.co.za](mailto:reception@prosourcing.co.za)

Website: [www.prosourcing.co.za](http://www.prosourcing.co.za)

## **JURISDICTION**

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Please be informed that any proceedings arising out of or relating to your use of Professional Sourcing (Pty) Ltd.'s website, its content and services will be subject to the laws of the Republic of South Africa and the courts in the Republic of South Africa shall have exclusive jurisdiction.

## PAIA GUIDE

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In order to assist those who are not familiar with PAIA or POPIA, a Guide that contains information to assist you in understanding how to exercise your rights under PAIA (“the Guide”) is available in all the South African official languages.

- The Guide is currently available on the following site:  
<https://www.sahrc.org.za/index.php/understanding-paia>  
[https://www.gov.za/sites/default/files/gcis\\_documents/SAHRC-PAIA-guide2014.pdf](https://www.gov.za/sites/default/files/gcis_documents/SAHRC-PAIA-guide2014.pdf)

If you have any queries, or need a copy of the Guide, please contact the Information Regulator directly at:

- The Information Regulator (South Africa)
- JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- P.O Box 31533, Braamfontein, Johannesburg, 2017
- Complaint’s email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)
- General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).

## INFORMATION THAT IS AUTOMATICALLY AVAILABLE WITHOUT A PAIA REQUEST

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The information available on our website, may be automatically accessed by you without having to go through the formal PAIA request process.

## INFORMATION RELATED TO POPIA

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1. POPIA requires us to provide you with certain information relating to how personal information that we process is, amongst others, used, disclosed, and destroyed.
  
2. In terms of POPIA we are required to provide you with the following information:
  - details of all personal information which we process;
  - the purpose of the processing;
  - a description of the categories of data subjects and of the information or categories of information relating thereto;
  - the recipients or categories of recipients to whom the personal information may be supplied;
  - planned transborder flows of personal information; and
  - a general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information which is to be processed.
  
3. Professional Sourcing (Pty) Ltd may collect personal information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
  - information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person;
  - information relating to the education or the medical, financial, criminal or employment history of the person;
  - any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;

- the biometric information of the person;
4. The purpose of processing the above personal information by Professional Sourcing (Pty) Ltd will depend on the nature of the personal information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time that the personal information is collected. In general, personal information is processed for purposes of dealing with a variety of operational purposes, requests, complaints, procurement purposes, marketing purposes, supply and demand purposes, risk purposes, records management, security, employment, and related matters.
5. Professional Sourcing (Pty) Ltd holds information and records on the following categories of data subjects:
- Clients/ Candidates - Natural Persons Names; contact details; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; confidential correspondence.
  - Clients / Candidates – Juristic Persons / Entities Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories; beneficiaries; ultimate beneficial owners.
  - Clients /Candidates – Foreign Persons / Entities Names; contact details; physical and postal, financial information addresses; date of birth; Passport number Tax related information; nationality; gender; confidential correspondence; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.
  - Contracted Service Providers Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding

documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.

- Intermediary / Advisor Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.
- Employees / Directors / Potential personnel / Shareholders / Volunteers / Employees' family members / Temporary Staff Gender, Pregnancy; Marital Status; Race, Age, Language, Education information; Financial Information; Employment History; ID number; Next of kin; Children's name, gender, age, school, grades; Physical and Postal address; Contact details; Opinions, Criminal behaviour and/or criminal records; Well-being; Trade Union membership; external commercial interests; Medical Information: Website end-users / Application end-users Names, Electronic identification data: IP address; log-in data, cookies, Electronic localization data; cell phone details, GPS Data.

(This list of categories of data subjects is non-exhaustive.)

6. The recipients or categories of recipients to whom the personal information may be shared or supplied to depends on the nature of the personal information, and the purpose or reason why it is being processed. Professional Sourcing (Pty) Ltd may supply information or records to the following categories of recipients:

- Employees of Professional Sourcing (Pty) Ltd ;
- Clients of Professional Sourcing (Pty) Ltd, pertaining to an available job vacancy suited to your resume, skills, and / or experience;
- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- South African Revenue Services, or another similar authority;

- Anyone making a successful application for access in terms of PAIA or POPIA; and
  - Credit bureau or credit providers industry association or other associations for an industry in which Professional Sourcing (Pty) Ltd operates.
7. If a data subject visits Professional Sourcing (Pty) Ltd.'s website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.
  8. Professional Sourcing (Pty) Ltd may need to transfer a data subject's information to service providers in countries outside South Africa, in which case it will ensure that it either complies with the applicable data protection legislation in those countries where the recipient is situated or ensure that it enters into an agreement with the recipient of the personal information which compels the recipient to protect that information, to a no lessor standard that is found under POPIA.
  9. Professional Sourcing (Pty) Ltd takes extensive information security measures to ensure the confidentiality, integrity, and availability of personal information in our possession. Professional Sourcing (Pty) Ltd takes appropriate technical and organisational measures designed to ensure that personal information remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

These measures include:

- Firewalls;
- Virus protection software and update protocols;
- Logical and physical access control;
- Secure setup of hardware and software making up our information technology infrastructure; and
- Outsourced service providers who are contracted to implement security controls.