



1. Background

Managed Integrity Evaluation (Pty) Ltd (“MIE”) is the largest background screening company in South Africa. Background screening is required by companies to check and verify various pieces of personal and confidential information on an individual or organization (“Data Subject”) when the company needs verify whether an individual or organization is being truthful and transparent about their credentials. Such checks include but is not limited to education qualifications, existence of a criminal record, checking employment references, credit checks, employment history and are also used as a proactive step in identifying and reducing or mitigating potential hiring and procurement risk, based on tangible available information.

MIE is a registered Credit Bureau in terms of the National Credit Act, No 34 of 2005 (“NCA”), with the National Credit Regulator (“NCR”) registration number; NCRCB11, a member of the South Africa National Association of Professional Background Screeners (NAPBS), and an Affiliate member of the Credit Bureau Association (“CBA”).

MIE as an EOH Company is obligated to comply with the EOH Governance requirements which includes alignment to and or adherence to group Privacy Policies amongst other policies.

2. Privacy Commitment

MIE is committed to ensuring that your personal information is processed in accordance with applicable Data Processing Legislation. MIE will take all reasonable measures, through the implementation of appropriate policies, procedures, technology and controls to ensure that your personal information is appropriately secured and protected and processed only for lawful purposes.

3. Information Collection

3.1 In some instances, when engaging directly with you, MIE acts as a Responsible Party in terms the Protection of Personal Information Act (“**POPIA**”) or a Data Controller in terms of the General Data Protection Regulations (“**GDPR**”). In all other instances MIE may be regarded as a Data Processor or Operator. MIE collects your personal information when you register, with MIE for any service or product provided by MIE. This information may be updated to your personal information as held by MIE.

3.2 In terms of the NCA, MIE is authorized to receive, process and store consumer credit information. Personal Information includes consumer credit information.

3.3 The NCA also authorizes a credit bureau to receive consumer credit information from the following sources

- An organ of State, a court or judicial officer
- Any person who supplies goods, services or utilities to consumers, whether for cash or credit
- A person providing long terms and short terms insurance
- Entities involved in fraud investigation
- Educational Institutions
- Debt Collectors to whom book debt was ceded or sold by a credit provider



MIE Privacy Notice

- Other registered credit bureau
- The NCR or any source authorized by the NCR
- A consumer for the consumer to correct or challenge information held by a credit bureau

MIE may also receive the following information about you from yourself, the company requesting a Background Screening or from the verification source for the purpose of Background Screening.

Individual

- Identity or Passport number
- Name details
- Contact information
- Education Information
- Employment Information
- Biometric Information
- Other lawful information that the data subject has consented to

Organization

- Registration Number
- Name details
- Contact information
- Financial Information
- Trade References
- Number of Employees
- Personal details of Directors
- Other lawful information that the data subject has consented to

3.4 MIE may make use of cookies, which may be placed on your computer when you both visit and register on any MIE website or product site. A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information back from the browser.

3.4.1 MIE cookies may be used for the following for the following purposes:

- To enable certain features and functions on websites, e.g. remembering user-id, favourite channel selections, browsing and other service preferences;
- To build up a profile of how users experience the website;
- To improve the efficiency of MIE's website;
- To administer services to users and advertisers; and
- To establish usage statistics.

3.4.2 Most internet browsers provide users with the option of turning off the processing of cookies (please see the "help" section of the browser), but this may result in the loss of functionality, restrict use of the website and/or delay or affect the way in which it operates.



3.4.3 Advertisements on the MIE website may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. MIE does not control these third parties and their cookie policies.

3.4.4 MIE is not responsible for the Personal Information policies (including Personal Information protection and cookies), content or security of any third party websites linked to the Website.

3.5 MIE also collects information that your browser sends whenever you visit MIE websites. This information may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, and the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

4. Information Use and disclosure

4.1 Use and Disclosure as per NCA

4.1.1 The NCA provides the purposes for which MIE may release consumer credit information. In addition to the NCA, MIE will adhere to processing obligations embodied in POPIA and GDPR. In terms of the NCA, a credit bureau may release consumer credit information for the following purposes: -

- an investigation into fraud, corruption or theft, provided that the South African Police Service or any other statutory enforcement agency conducts such an investigation;
- fraud detection and fraud prevention services;
- considering a candidate for employment in a position that requires honesty in dealing with cash or finances;
- an assessment of the debtor's book of a business for the purposes of (i) the sale of the business or debtors book of that business; or (ii) any other transaction that is dependent upon determining the value of the business or debtors book of that business;
- setting a limit of in respect of the supply of goods, services or utilities;
- assessing an application for insurance;
- verifying educational qualifications and employment;
- obtaining consumer information to distribute unclaimed funds, including pension funds and insurance claims;
- tracing a consumer by a credit provider in respect of a credit agreement entered into between the consumer and the credit provider;
- developing a credit scoring system by a credit provider or credit bureau;
- an affordability assessment in respect of a consumer, as required by Section 81 of the Act;
- a credit assessment in respect of a consumer, as required by section 81 (2) of the Act;
- investigating an application for debt review made by a consumer
- a contemplated or permitted purpose as may be envisaged by the NCA

4.1.2 MIE may update your MIE credit bureau records with the personal information you provide or which is provided

4.1.3 MIE may use the information you provide to maintain contact with you in terms of

- Any queries that you may have lodged with MIE
- Keeping you informed about new developments on or any changes to the services you may have access.



4.2 Background Screening

4.2.1 MIE shall use your information that is provided for Background Screening purposes to perform the verification as may be requested on you subject to you completing a consent form with the requesting company where such consent is required.

4.2.2 Verification as required in 4.2.1 requires that MIE share your personal information with other entities that will be able to provide the respective verification.

4.2.3 In the event a verification result is received that the information provided to MIE is fraudulent, MIE is obliged to register your information with any service recording fraudulent information.

4.3 MIE may use cookies to identify you when you access the MIE website and to build up a demographic profile of its users.

4.4 MIE may use your Personal Information

4.4.1 to contact you with newsletters, marketing or promotional materials and other information or

4.4.2 to conduct market research and surveys to enable MIE to understand and determine customer location, preferences and demographics in order to develop special offers and marketing programmes in relation to MIE products and services, and to improve our service delivery and customer experience;

4.4.3 to provide additional products, services and benefits to users, which include promotions, loyalty and reward programmes from MIE;

4.4.4 to match Personal Information with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services by MIE;

4.4.5 For leads generation and management of marketing MIE's products and services;

4.4.6 To administer contests, competitions and marketing campaigns, and personalize user experience;

4.4.7 To communicate advertisements involving details of MIE's products and services, special offers and rewards, either to general customers, or to communicate advertisements which MIE has identified as being of interest to specific users (this includes but is not limited to upselling, cross selling and telemarketing);

4.4.8 to organize promotional events and corporate social responsibility projects; and

4.4.9 For purposes which are reasonably related to the aforementioned.

4.5 In relation to particular products and services or user interactions, MIE may also specifically notify users of other purposes for which personal information is collected, used, or disclosed.

4.6 Users have a choice to withdraw consent for receiving marketing or promotional materials/communication. Users may contact MIE Information Officer: informationofficer@mie.co.za

4.7 Once MIE receives confirmation that a user wishes to withdraw consent for marketing or promotional materials/communication, it may take up to 30 (thirty) working days for the withdrawal to be effected. Therefore, users may continue to receive marketing or promotional materials/communication during that period of time. In may be noted that even upon withdrawal of consent for the receipt of marketing or promotional materials, MIE may still contact users for other purposes in relation to the products and services held by users or subscriptions to MIE.



5. Cross Border transfer

- 5.1 MIE may transfer your personal information to another country for storage and processing provided that the country has equivalent or better data protection laws in order to adequately protect your personal information.
- 5.2 Subject to the verification request originating from a MIE Client located outside of the Republic of South Africa, and that you have consented to such verification, MIE shall transfer the result of the verification request to the client in the foreign location. MIE will ensure the adequate security measures are implemented to protect your personal information during the transfer,

6. Information Retention

- 5.3 MIE will retain your personal information in accordance with any retention legislation relating to such personal information.
- 5.4 Consumer Credit Information will be retained in accordance with the National Credit Act
- 5.5 Personal Information including but not limited to Biometric information will be retained with your consent for as long as you may require any verification and or background screening to be conducted on you.
- 5.6 In the absence of any legislation governing a particular type of personal information, MIE shall retain such information for as long as it may be required for a lawful purpose or until you or the company that has requested your information, request the deletion of such personal information, provided that there is no lawful reason for which such personal information must be retained by MIE.

7. Your rights in terms of your personal information use and disclosure

7.1 Right to access your personal information:

- You may request, free of any charge, for MIE to confirm if it has personal information on you.
 - You can make your request by calling MIE on 011 644 4000 or emailing informationofficer@mie.co.za and using the subject : **Data subject access request**.
 - You will be required to provide proof of identity
- Once MIE has confirmed that it has your personal information, you may request via the call centre or via email, the detail of the personal information. In accordance with Section 23 (1)(b), MIE may charge a fee for providing this information and such a request may take up to 30 business days to complete.
- When MIE provides you with this report, MIE will be giving effect to your Right to data portability.

7.2 Right to challenge and correct the accuracy of your personal information:

- You may challenge the accuracy of your personal information as held by MIE.
- To lodge a challenge you should email your dispute to dispute@mie.co.za and a MIE will send you a Dispute form to complete.
- Your rights to challenge detailed here are equivalent to your Right to rectification as per GDPR
- MIE will give effect to your rights under GDPR with regards to the processing of your personal information provided that there are no applicable exclusions in terms of GDPR.



7.3 **Right to object to processing of your personal information:**

- You may object to the processing of your personal information by not completing a consent form when requested to do, except where the lawful purpose does not require consent.
- You may also withdraw your consent at any time prior to the processing of your information by informing the company to whom you have provided the consent that, you require that the company stop processing your information.
- You may object to the processing of your personal information provided that a request to process your information has not already been received by MIE and processing thereof by MIE has already begun. You can make your request by calling MIE on 011 644 4000 or emailing informationofficer@mie.co.za and using the subject : **Objection to Processing request.**
 - You will be required to provide proof of identity

8. **Security**

- 8.1 The security of your Personal Information is important to MIE.
- 8.2 MIE Information Security Policies guides the processing of personal information and ensures that MIE protects your personal information.
- 8.3 The personal information that MIE collects and processes shall be secured by appropriate technical and organizational measures against accidental loss, destruction or damage, and against unauthorized or unlawful processing.
- 8.4 MIE shall regularly evaluate and test the effectiveness of such measures to ensure that they are adequate and effective.
- 8.5 MIE is a responsibility for ensuring the security of personal information processed throughout the performance of its duties.

9. **Changes to this Privacy Notice**

- 9.1 MIE may update or change this Privacy Notice as often as required in order to adequately reflect the processing of personal information by MIE.
- 9.2 You should check this Privacy Notice periodically to access the most recent Privacy Notice

10. **Contact Us**

If you have any questions about this Privacy Notice, please contact MIE Information Officer: informationofficer@mie.co.za