

## PRIVACY NOTICE FOR JOB APPLICANTS

WNS means and includes **WNS GLOBAL SERVICES SA (PTY) LTD** and **WNS SOUTH AFRICA (Pty) Ltd** and Ucademy Pty Ltd. registered at WNS House Knowledge Park 2, 2 Heron Crescent, Century City, Cape Town 7441, is committed to protect the privacy and security of your personal information that we process. It is important that you read this Privacy Notice ("Notice") so that you are aware of how and why we are using your personal information.

- 1. Purpose:** This Notice describes how we collect and use personal information about you, during and after your working relationship with us, in accordance with the Protection of Personal Information Act (POPIA).
- 2. Applicability:** This Notice applies to all job applicants applying for jobs at WNS. This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time, subsequent to which, a copy of the updated Notice will be furnished to every job applicant at the earliest.
- 3. Relationship and Purpose of Processing Information:** WNS is responsible for deciding how we hold, use and process your personal information. As your prospective employer, we need to keep and process information about you for normal employment purposes including hiring, recruitment and staffing purposes, for entering into a contract with you, for complying with legal obligations and for record keeping purposes including contacting you for suitable opportunities that may arise in future. Processing will include collection, receipt, recording, organisation, collation, storage, updating or modification, alteration, retrieval, consultation, and use, dissemination by transmission, distribution, merging, linking, as well as restriction, degradation, erasure or destruction of your personal information. The information we hold and process will be used for management, operational and administrative purposes only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, whilst you would be working for us, at the time when your employment ends and after you have left us. This includes using information to enable us to comply with the employment contract that we would be executing with you in case of your selection and any legal and customary requirements, pursue our legitimate interests, protect our workforce and stakeholders against injury, theft, legal liability, fraud, abuse and protect our legal position in the event of legal proceedings and compliance including compliance with government authority requests for information, liens, garnishments and tax compliances. If you do not provide this information or request for the deletion of information we may be unable in some circumstances to comply with our legal obligations and we will tell you about the implications of that decision.

### 4. Personal information we will process about you:

WNS may process the following categories of personal information about you:

- Personal details including name, title, addresses, post code, telephone numbers, mobile number, personal email addresses, date of birth, gender, age, utility bills, photographs, signatures etc.;
- National ID details including passport number, driving license, tax identification numbers, national identification numbers (South African ID), etc.;
- Recruitment information including work experience, qualification details, copies of right to work documentation (work permit certificate), references and other information included in a CV or cover letter or as part of the application process, language test results, background check report, credit check report previous employment references/feedbacks etc. wherever permissible by the local laws, etc.;

- CCTV footage and other information obtained through electronic means such as swipe card records, etc.

We may also process the following "special personal information", wherever applicable in accordance with the laws and requirements of South Africa:

- Medical information including health, disability details,
- Criminal information including criminal convictions and offences;

## **5. How is your personal information collected**

WNS collects personal information about job applicants through application, forms and interviews as a part of the recruitment and on-boarding process, either directly from the job applicants or sometimes indirectly from third party service providers including employee referrals, an employment agency or background check provider/agency, former employers, credit reference agencies, medical clinics etc. We will collect additional personal information in the course of job-related activities throughout the period you would be working for us. All information including any additional information collected during the recruitment process will be used and stored for performance of recruitment activity and the employment agreement that we would be executing with you in case of your selection, as well as for complying with the legal obligations or legitimate interests of WNS.

## **6. How will we use personal information about you/Our basis of processing**

WNS will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we would be required to execute the employment contract with you based on your selection.
- Where we need to comply with a legal obligation. (For example, where it is required to check a successful applicant's eligibility to work in the country before employment starts.)
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. (For example, we need to process for administrative and record keeping purposes, etc.)
- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest (or for official purposes).
- Where we have sought your explicit consent (in case of client interviews).

## **7. If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform our recruitment process and the contract that we might have to execute with you based on your selection (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees).

## **8. Change of purpose**

WNS will only use your personal information for the purposes for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and will explain the

legal basis which allows us to do so without undue delay. Please note, that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **9. Special personal information**

Special personal information requires higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information in accordance with Section 26 and 27 of POPIA. We may process special personal information in the following circumstances:

- Where processing is carried out with the consent of a data subject
- Where processing is necessary for the establishment, exercise or defence of a right or obligation in law
- Where processing is necessary to comply with an obligation of international public law
- Where processing is for historical, statistical or research purposes to the extent that
  - the purpose serves a public interest and the processing is necessary for the purpose concerned; or
  - it appears to be impossible or would involve a disproportionate effort to ask for consent,
  - and sufficient guarantees are provided for to ensure that the processing does not adversely affect the individual privacy of the data subject to a disproportionate extent;
- information has deliberately been made public by the data subject
- provisions of sections [28](#) to [33](#) of POPIA are, as the case may be, complied with.

## **10. Information sharing**

WNS may share your personal/special personal information with the following recipients:

- Third parties with whom we have a contractual relationship, including, medical vendor, law firm, data shredding, background check vendor, etc. We require third parties to respect the security of your information and to treat it in accordance with our instructions and as per the law.
- Other WNS entities for internal administrative purposes. We may transfer your personal information outside South Africa for processing in accordance with the Inter company agreement executed between WNS and WNS Global Services Private Limited (India).

## **11. Transferring information outside South Africa**

WNS may transfer the personal information that it collects about you to internal group companies located in India, outside South Africa, for the purpose of legitimate interests, performance of employment contract and internal administration.

However, to ensure that your personal information does receive an adequate level of protection, we have executed binding agreement with WNS Global Services Private Limited (India) to ensure that your personal information is treated by those WNS entities in a way that is consistent with and which respects South Africa and regional laws on data protection.

## **12. Data security**

WNS has put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure. We do enter into specific agreements with such third parties to ensure compliance.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **13. Data retention**

WNS will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further Notice to you. Personal information of successful and unsuccessful candidates will be retained and securely destroyed in accordance with our Data Retention Policy or applicable laws and regulations.

### **14. Responsible Parties**

The following is the list of Responsible Parties across WNS entities which are involved in the processing of your information. Depending on the location, any one of the following will act as Responsible Party for the personal information that is being processed by WNS:

<b>Sr.No</b>	<b>Location</b>	<b>Responsible Party</b>
1.	South Africa	WNS Global Services SA (Pty) Ltd
2.	South Africa	WNS South Africa (Pty) Ltd
3.	South Africa	Ucademy (Pty) Ltd

### **15. Information Officer**

WNS has appointed an Information Officer (IO) to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your personal information, please contact the IO at [popia@wns.com](mailto:popia@wns.com). You have the right to make a complaint at any time to the regional supervisory authority for data protection issues.

### **16. Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

## 17. Rights Available to you

Your rights in connection with personal information: Under certain circumstances, by law, you have the:

- **Right to be Notified** about the collection and use of personal information or if it has been accessed by an unauthorized person.
- **Right to request Access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you.
- **Right to request Correction, Destruction or Deletion** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected and will also enable you to ask us to delete or remove personal information which we process about you subject to limited circumstances in accordance with the POPIA requirements
- **Right to Object to Processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Right to Restriction of Processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Right Related to Automated Decision Making Including Profiling.** You will have a right not to be subjected to a decision based solely on automated processing including profiling.
- **Right to Submit a Complaint** to the Information Regulator in the prescribed manner and form alleging interference with the protection of the personal information of a data subject.
- **Right to Institute Civil Proceedings** regarding the alleged interference with the protection of your personal information.

All the above mentioned rights can be exercised by contacting the IO at [popia@wns.com](mailto:popia@wns.com).

## 18. No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you have any questions about this Notice, please contact IO at [popia@wns.com](mailto:popia@wns.com)