### PRIVACY POLICY

# Skillzpage (Pty) Ltd

## **INTRODUCTION**

- 1. The Skillzpage (Pty) Ltd privacy policy appears below, please read through the document carefully and ensure that you understand all the terms contained herein. Should you have any queries or questions please feel free to send an email to info@skillzpage.co.za (example). We undertake to uphold the highest level of confidentiality when dealing with private information. By continuing to use our services you, as the user (including freelancers), recruiter or vendor consent to the terms of this privacy policy.
- 2. No information is sold or leased to third parties. Please note that our policy may be updated from time to time and we suggest that you familiarise yourself with the policy on a regular basis. Should you require any information on updates please contact us at info@skillzpage.co.za (example). If you do not agree to the changes made, please notify us immediately.
- 3. Skillzpage is the sole owner of the information collected on this site. We will not sell, share or rent this information to others in ways different from what is disclosed in this statement. Skillzpage collects information from our users at several different points on our website.

## **PERSONAL INFORMATION**

- 4. When you fill out registration forms, submit your resume or provide us with other information actively, you will know what information we are collecting because you are actively submitting it. Because we change our offerings and features from time to time, the options you have to provide us with personal information also may change, but here are some examples of situations in which you may decide to provide personal information to us:
  - Creating an account;
  - Signing up for email alerts;
  - Completing a form related to one of our products or services;
  - Uploading a CV Profile
  - Uploading a Freelancer Profile
  - Uploading a Company page;
  - Contacting us for technical support or customer service.
- 5. Depending on how you interact with SkillzPage, the personal information we collect from you may vary. For example, to create an account we may ask you to provide your name, surname, phone number, email and postal address, company details or career history. In other circumstances, such as when you complete a form related to a particular service offering, we may ask you to provide other information which may include all of above mentioned and for you to select and upload a preferred payment method ( such as bank account details, credit or debit card, paypall details).

- 6. You should not include sensitive data (such as, social security number, driver's license number, credit or debit card numbers, etc.) in any CV you upload to Skillzpage or submit it in any other scenarios, except where we specifically prompt you to provide such information on our site.
- 7. If you connect to Skillzpage using Linkedin, Facebook, Google+, we will receive information that you authorize the Social Networking Site to share with us, including information about your friends and connections on that Social Networking Site. Any information that we collect from your Social Networking Site account may depend on the privacy settings you have set with the Social Networking Site, so please consult the Social Networking Site's privacy and data practices.

## **COLLECTION OF INFORMATION AND USE OF TECHNOLOGY SUCH AS COOKIES**

- 8. Our users share personal identities, contact details and information relating to but not limited to potential employment opportunities as well as past employment history and references. The users may also post video footage of themselves (including voice recordings or sound clips) and comment on posts. Skillzpage (Pty) Ltd is not responsible for the content posted by users, recruiters, employers and/or vendors, however when inappropriate content is brought to our attention, we undertake to remove same and we expressly reserve the right to do so. Vendors may upload adverts containing information related to, but not limited to education or services or products offered by them including contact details and other relevant information.
- 9. The use of certain technologies such as cookies, tags, scripts or beacons are hereby disclosed. Cookies are data that is sent to your browser from a website and is then stored on your hard drive. Any person using the website may select to disable cookies in the browser but this may affect the ability to use certain functions on the site. These technologies will be utilised by Skillzpage (Pty) Ltd (or its partners/service providers) to gather demographic information, tracking usage and the behaviour associated therewith, managing user access, tracking user settings, recognition of repeat users, analysing trends, tracking user movement on the site. Skillzpage (Pty) Ltd may receive reports and data related to the cookies, tags etc.
- 10. Information relating to devices and networks: we collect information relating to the devices and networks used to access our website and our related services. This includes IP addresses of the user and/or recruiter as well as third party links that are accessed.
- 11. You consent to the use of cookies and similar technology to collect information, described in more details above. Should you not agree you should not register an account or use the services of Skillzpage (Pty) Ltd.

We will only disclose your information to third parties under the following circumstances:

- 11.1 When you consent to that information being disclosed to a third party;
- 11.2 Where it is necessary to perform the functions which are part of the services requested by you or is necessary to carry your request and/or instruction;
- 11.3 When required to disclose information by operation of legislation, common law, subpoena or similar legal process;

- 11.4 When necessary to enforce any term/s in the user/recruiter agreement, to which you have agreed;
- 11.5 When authorised to do so in terms of this privacy policy.

We hereby disclose to you the type of information that we collect, which includes but is not limited to:

- 11.6 Registration information (including but not limited to): name, surname, email address, identity number, account password and any further information that may be required to open and register an account for you, as a user, recruiter or vendor. Users may be required to provide additional documentation such as company registration documents and information relating to the Directors, members, owners or partners of the recruitment company ("the recruiter").
- 12. When you use Skillzpage, your device is automatically providing information to us so we can respond and customize our response to you. The type of information we collect by automated means may vary, but generally includes technical information about your computer, such as your IP address or other device identifier. The information we collect also may include usage information and statistics about your interaction with Skillzpage.
- 13. User and/or recruiter profile information (including but not limited to): professional details, employment history, educational details and history, skills and related personal information, social groups and memberships, career objectives, awards, company registration information, email addresses, mobile telephone number, credit card details, etc. The majority of information and contents posted will be publicly displayed, so all information provided should be information that you agree to be made public, other than credit card details.
- 14. Information provided by Companies, Recruitment Agencies and Individual Freelance Clients;
  - Company Name
  - Contact Person Name and Surname
  - Position Title
  - Phone Number
  - Email Address
  - Website Address
  - City or Town & Country (Province)
  - Username
  - Password
  - Verified Payment method

## **15.INFORMATION PROVIDED BY CANDIDATES**

To use any functionality on this website, a user must first complete the registration form.

During registration a user is required to give the following information:

- Full Names
- Phone Number
- Email Address

- City or Town & Country (Province)
- Username
- Password

We require the SkillzPage candidate to provide the following information on our Registration Profile form including but not limited to;

## Personal Details:

- Full Names
- Date of Birth
- ID Number (Optional)
- Ethnicity (mandatory field for South African based users)
- Phone Number
- Email Address
- Location
- Languages
- Education Details
- Employment History
- Top Skills
- Current Salary
- Salary Expectations
- Ideal Opportunities
- Availability (Notice period)
- Block List Employers from finding me
- Verified Payment method

This information is used for the online Recruitment process and this includes allowing SkillzPage to send Jobseeker CV Profiles and all associated documents to Employers for the purpose of a jobseekers job application process where such a CV profile and associated data may be stored by the employer for future recruitment considerations.

An employer may make contact with a jobseeker for recruitment opportunities as a result of a CV profile search conducted by an employer on our website. If we have trouble processing a request, the contact information is used to get in touch with the user. If you refer our services to a friend we will ask you for your friend's full names, and email address. We will automatically send your friend a once-off email inviting him or her to visit the site and Skillzpage will not store this information.

The personal information that you provide to us may reveal or allow others to identify aspects of your life that are not expressly stated on your profile (for example, your picture or your name may reveal your gender). By providing personal information to us when you create or update your account and profile, you are expressly and voluntarily accepting the terms and conditions of our User Agreement and freely accepting and agreeing to our processing of your personal information in ways set out by this Privacy Policy.

Supplying to us any information deemed "sensitive" by applicable law is entirely voluntary on your part. You can withdraw or modify your consent to our collection and processing of the information you provide at any time, in accordance with the terms of this Privacy Policy and the User Agreement, by changing your account settings or your profile.

## **16.INFORMATION PROVIDED BY FREELANCERS**

Information is used to contact the user about the services on our site for which they have expressed interest. We collect personal information and Web Site use information as you interact with the Skillzpage website.

When you register with Skillzpage as a Freelancer or as a Freelancer Employer you provide certain personal information including but not limited to;

- Full Names
- Phone Number
- Email Address
- Physical Address
- City or Town & Country (Province)
- Verified Payment method
- Username
- Password

Depending on the service used it could include financial information such as bank account numbers, Transactional information based on your actions on the site such as bidding, buying, selling and item content you generate that related to your account.

Payment Information: If you use the Service to make or receive payments, we will also collect certain payment information, such as credit card, PayPal or other financial account information, and billing address.

If you post information on a bulletin board, or particulate in a public message board, comment on any public messages you should be aware that any personal identifiable information you choose to provide there can be read, collected, or used by other users of these forums and could be used to send you unsolicited messages.

Personal information you provide through correspondence such as comments, messaging, and dispute resolution or shared by you from other social applications services or websites. Additional personal information we ask you to submit to authenticate yourself if we believe you are violating site policies. Aggregate Information: Skillzpage collects non-identifying, general, generic and aggregate information to better design our Web site and services.

Skillzpage is not responsible for the personally identifiable information you choose to post, submit on these forums. SkillzPage is the sole owner of information collected through the website.

# **17.PUBLIC PROFILE**

The Freelancer profile you create on our site will be publicly accessible unless otherwise indicated. You may change the privacy settings of your profile through your account portal.

### 18. VIDEO INTERVIEW PRIVACY

**EMPLOYERS** (Organizations or Individuals inviting others for interviews are known hereunder as the Interviewer)

Companies use Skillzpage Video Interview to conduct remote Interviews. Our service requires you to sign up for a Skillzpage account and potentially create Interview Questionnaires asking questions to potential candidates you will invite to complete a Video Interview.

When you do, you will provide personal information, including but not limited to;

- Full names
- Company Name
- Website Address
- Location
- Email address

During interviews, candidates are asked to answer questions provided by the interviewing company. These answers will be recorded by audio and video and these recorded answers will be made available to the interviewer.

Interviews will normally be stored for 24 months after which time they will be deleted unless you or the interviewing company has chosen to archive the information for a longer period (at an additional cost).

SkillzPage is not a data controller of any information recorded in an interview. SkillzPage simply acts as a data processor who facilitates the recording of the data and transmits any personal data contained in the interview from the candidate to the interviewer. We maintain a copy of the interview on the hosting servers of our hosting partners for secure access by the nominated representatives of the interviewer.

As the data controller of interviews is the potential employer, candidates must contact the company in question if they wish to raise any issues in respect of the interview.

## 19. USERS COMPLETING A VIDEO INTERVIEW (RECORDER)

- Skillzpage holds all parties which share your information to a code of conduct and will actively cooperate to shut down any users in violation of this code of conduct.
- All responses entered into the Skillzpage system by Recorders remains the property and control of the Recorder.
- The Recorder grants Skillzpage a perpetual license to display and share their responses with third parties. Any and all data entered on this website can be shared with third parties without your explicit consent.

## **20.DATA SECURITY AND STORAGE OF INFORMATION**

This website takes every precaution to protect our user's information online. When asked to enter sensitive information online. When asked to enter sensitive information (such as credit card number) the information is encrypted and is protected via secure socket layer (SSL) encryption technology.

- 20.1 We also do everything in our power to protect user information offline. Access to all of our users' information is restricted in our offices.
- 20.2 The servers on which we store personally identifiable information are kept in a secure, access controlled environment. If a user's personally identifiable information changes (such as their email address), or if a user no longer desires our service, we will provide a way to correct, update or remove that user's personal details provided to us. This can be done from the user's account settings where they may choose to end or pause their account.
- 20.3 We restrict access to personal information to Skillzpage employees who are bound by confidentiality agreements and may be subject to disciplinary action and/or criminal prosecution if they fail to meet these obligations, and potential employers who require your information in order to have a more accurate assessment of your skills and assets for the sole purpose of assessment.
- 20.4 Only employees who need the information to perform a specific job are granted access to personally identifiable information.

Furthermore, all employees are kept up-to-date on our security and privacy practices.

- 21. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while Skillzpage will take all reasonable steps to protect your Personal Data, the nature of the Internet is such that Skillzpage cannot guarantee or warrant the security of any information you transmit via the Internet.
- 22. We use hosting provider Amazon Web Services, therefore your information may be transferred to and stored on servers in various locations. We protect your information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access authorisation controls.

## **HOW WE USE INFORMATION**

23. When you use the Skillzpage site, we may request certain information. Skillzpage does not share any of your personally identifiable or transactional information with any person or entity, other than as set out in this policy and the Terms and Conditions.

No other third party receives your personally identifiable information or other transactional data except for approximate location / geo-location information when you use the Local jobs service and those with whom you have transactions and share that information. The information we collect is used to improve the content of our web site, used to notify consumers about updates to our web site and for communications, such as customer service.

24. We do not rent, sell, or share Personal Information about you with other people or non- affiliated companies for marketing purposes (including direct marketing purposes) without your permission. We may use and share Non-Personal Information for our marketing purposes, including, without limitation, marketing on other websites. For example, we may use the information to control the number of times you have seen an ad, deliver ads tailored to your interests, and measure the effectiveness of ad campaigns. You can prevent us from tailoring our ads to you on other websites by deleting your cookies (see below).

# We may use the information we collect:

- to better understand your needs and provide you with better services and personalized content.
- To help you advertise vacancies and to apply for vacancies
- To complete transactions
- Communicate back to you
- Credit card numbers, PayPal details or banking details are used only for payment processing and are not retained for other purposes. Refer to our Terms and Conditions as we use a secure Payment Gateway named Paygate to process transactions
- for data aggregation and statistical analysis that does not identify you and that we can use to compile and provide international market trends
- to display salary surveys
- to display company reviews
- to display interview reviews
- to contact you from time to time for market research or to provide you with marketing information we think would be of interest to you ( we will always give you the opportunity to unsubscribe to the receiving of such direct communication or market research contact)
- to display interview reviews
- to display Company reviews
- to customize and improve the features, performance, and support of the site;
- to display to you relevant information if you connect to Skillzpage through a Social networking site, from your social networking site friends and connections, and to allow you to share jobs, company pages, and other relevant information with them
- to provide recruiting services to employers;
- for internal operations, including troubleshooting, data analysis, testing, research, and service improvement;
- to communicate with you regarding our services, changes or new products
- for other purposes that you separately authorize as you interact with Skillzpage.
- Marketing: You agree that we may use your personal information to tell you about our services and tools, deliver targeted marketing and promotional offers based on your communication preferences, and customise measure and improve our advertising. You can unsubscribe from emails at any time by clicking the unsubscribe link contained in the email.

- To provide and improve the Service, complete your transactions, and address your inquiries, process your registration, verify the information you provide is valid and for compliance and internal business purposes;
- To enforce and comply with the law, including to conduct an investigation, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable activity.
- For the purposes disclosed at the time you provide your information, with your consent, and as further described in this Privacy Policy.
- Unless you request that we delete certain information, we retain the information we collect for at least 5 years and may retain information for as long as needed for our business and legal purposes.

## **NOTIFICATION OF CHANGE IN INFORMATION**

25. Skillzpage reserves the right to modify this Privacy Policy Statement at any time without notice to reflect changes in legal or regulatory obligations or changes in the manner in which we deal with personal information. The Privacy Policy posted at any time or from time to time via this website shall be deemed to be the Privacy Statement then in effect. You are advised to regularly check for any amendments or updates to the terms and conditions contained in this privacy policy.

# INFORMATION ABOUT CANDIDATES AND FREELANCERS SHARED WITH CLIENTS:

- 26. Direct Companies, Recruitment Agencies and Individual Freelance Clients. We share information regarding candidate and freelancers work history, freelance job history and portfolio, including information in timesheets. If a Candidate or Freelancer is suspended from Skillzpage, we may share that information with Clients for whom that Candidate or Freelancer has worked or applied for work. We may also share information with Clients to whom Candidates and Freelancers are associated for a particular work project.
- 27. Candidates and Freelancers may choose to block list any former or any other Employers from being able to search and find them on Skillzpage. If you choose to apply for work as a Candidate or Freelancer via the Service we will share information relevant to your application with the applicable Client(s), including but not limited to, the information contained in your CV Profile or Freelancer Profile.

## INFORMATION ABOUT CLIENTS SHARED WITH CANDIDATES AND FREELANCERS

28. Your name, surname, company details will be shared with Candidates and Freelancers when you advertise a job or invite applicants to apply for any of your roles. Your Company details will be shared on your Skillzpage Company page. If you enter into a Freelance Contract Agreement with a Freelancer we may provide him / her with your company details in order to complete the transaction or to facilitate the resolution of a claim or dispute. The user receiving your information is not allowed to use it for purposed unrelated to the transaction such as to contact you for marketing purposes, unless you have expressly consented to it.

## **SERVICE PROVIDERS**

29. We may employ third party companies to facilitate our site and services to provide the service on our behalf to perform service related services without limitation such as maintenance services, database management, web analytics, and online advertising, payment processing, fraud detection and improvements of Skillzpage features. These parties may have access to your Personal information in order to perform these tasks on our behalf.

## **LEGAL DISCLOSURE**

30. Skillzpage will share information with government agencies as required by law, including without limitation, in connection with reporting earnings. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, at the request of governmental authorities or other third parties conducting an investigation, to protect the property and rights of Skillzpage or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable activity. We may also use Device identifiers to identify Skillzpage Users, and may do so in cooperation with third parties as our discretion.

### **GENERAL**

- 31. Skillzpage will not sell, rent, or lease your personally identifiable information to other 3rd parties except in the cases where a user registered as a candidate or freelancer has responded to a job advert or when our Clients contact candidates with job vacancies available. Unless we have your permission or are required by law, we will only share the personal data you provide online with other 3rd party entities as described in "how we use it". Such entities and/or business partners, are governed by our privacy policies with respect to the use of this data and are bound by the appropriate confidentiality agreements.
- 32. Skillzpage also reserves the right to disclose and/or transfer personal information to a third party in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of Skillzpage or of any of the business or assets or shares of Skillzpage or a division thereof in order for you to continue to receive the same products and services from the third party. We also partner with third parties to provide specific services. When the user signs up for these services, we will share names or other information that is necessary for the third party to provide these services.
- 33. These parties are not allowed to use personally identifiable information except for the purpose of providing these services. We will not voluntarily disclose any information about individual users to third parties, except as described in this privacy statement, or to comply with applicable laws or valid legal process, or to protect the rights or property of Skillzpage. We disclose personal information to respond to legal requirements, enforce our policies, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property, or safety. Such information will be disclosed in accordance with applicable laws and regulations. As stated above, we do not disclose your personal information to third parties for their marketing purposes without your explicit consent.

### **ACCURACY OF INFORMATION**

- 34. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information and you must update any changes through your online account. If you completely delete all such information, then your account may become deactivated. If your account is deactivated or you ask to close your account, you will no longer be able to use the Service. If you wish to close your account you may do so on your Personal profile by accessing the user settings and then close your account.
- 35. We will honour your request to close your account however certain information will remain active on the site even when you close your account, including information in your timesheets and messages you posted on the Site. In addition, your personal information may remain in our archives and information you update or delete, or information within a closed account, may persist internally or for our administrative purposes. In addition, we typically will not remove information you posted publicly through the site including but not limited to comments, reviews and ratings.
- 36. Once you have logged into the Site, you can view and update your Account data by clicking on the "Settings" button. Any issues with regard to the content of Video Interviews are private matters between the interviewing company and the candidate and Skillzpage will not act as an intermediary for such communications.

### COMMUNICATION

37. We communicate with you using Skillzpage messaging, email or other ways available to us. We send all new members a welcoming email to verify their username and password and other transactional emails for operational purposes, such as billing, account management, or system maintenance. You may only stop those emails by terminating your account. We may also send you promotions, product announcements, surveys, newsletters, developer updates, product evaluations, and event information or other marketing or commercial e-mails. From time to time we may send out critical service announcements. Users are not able to unsubscribe from critical service announcements, which contain important information about the service.

## **CHOICE / OPT OUT**

38. You can opt out of receiving promotions, product announcements, surveys, newsletters, developer updates and other related marketing or commercial emails by unsubscribing using the unsubscribe link within each email, updating your e-mail preferences on your User account or emailing us to have your contact information removed from our email list or registration database.

# **DATA PROCESSING OUTSIDE YOUR COUNTRY**

- 39. We may process your information outside the country where you live. We may transfer your information and process it outside your country of residence, wherever Skillzpage, its affiliates and service providers operate. Skillzpage is a South African company. If you are located outside of South Africa and choose to provide information to us, Skillzpage transfers information to South Africa for processing.
- 40. South Africa may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to

South Africa, we will protect it as described in this Privacy Policy according to South African laws and legislations.

## **AGE RESTRICTIONS**

41. Children under the age of 18 are not eligible to use our service. Skillzpage disclaims any and all responsibility for personal information it may receive from children under the age of 18.

## **LINKS TO OTHER SITES**

42. Links to third party web sites on the site are provided solely as a convenience to you. If you use these links, you will leave the Skillzpage website. Skillzpage has not reviewed all of these third party sites and does not control and is not responsible for any of these sites, their content or their privacy policy. Skillzpage does not endorse or make any representations about them, or any information, software or other products or materials found there, or any results that may be obtained from using them. If you decide to access any of the third party sites linked to this site, you do so at your own risk.

## **SEARCH**

43. Our Services help you search for other professionals, companies, groups, professional content, and jobs. You can search for Companies to follow, salary surveys, interview reviews, company reviews, and employment opportunities, information about companies, freelancers, freelance opportunities. You can also find employment opportunities and information about companies.

### **COMMENTS**

44. You are responsible for any information you post on our any of our services and this content will be accessible to others. If you participate in conversations by posting a comment, sharing content on a Company page, other content, you should be aware that any information you choose to disclose using these services can be read, collected, and used by other users, developers, and other third parties, including advertisers. We are not responsible for the information you choose to submit publicly on our site.

### **COMPANY PAGE**

45. Companies and other entities can create pages on our website. If you follow one of these pages, non-identifiable information about you will be provided to the page's administrators. If you follow a person or organization, you will be listed among its followers, which can be viewed by others including the page owner.