



## EMPLOYEE PRIVACY STATEMENT

The employee privacy statement (“statement”) is administered by Standard Bank People and Culture (“P&C”), a department in the Standard Bank Group which comprises of all subsidiaries of Standard Bank Group Limited (“Group”).

The employee privacy statement applies to all employees (which includes permanent and temporary employees, interns, secondees and as the context may require, applicants and candidates for positions (together “you”, “your”)) in the Standard Bank Group (“the Bank”, “we”, “us”, “our”).

This statement provides an overview of:

- the categories of personally identifiable information (also referred to as personal data) that the Group collects in relation to your employment or engagement with us;
- why and how we collect it;
- where we keep it;
- how we keep it secure;
- whether and under what circumstances we disclose it to any third parties;
- how long we keep your personal data; and
- your rights in respect of your personal data.

The information contained in this statement is not an exhaustive explanation but gives you an indication of what processing activities you can expect from us with regard to your personal data. Where appropriate and but for the contrary being indicated, reference to personal data in this statement should be read and understood to include sensitive/special personal data.

We will be the responsible party (also known as the “data controller”) of your personal data. This means that we are responsible for determining the purpose and the means of processing your personal data.

As we operate in various countries and through various legal entities we endeavour to comply with all applicable data protection laws relevant and applicable to the Group. As such, when processing any of your personal data we do so by adhering to the following principles of lawful processing:

- **Accountability** – as the responsible party the Group ensures compliance with the respective data protection laws when processing your personal data.
- **Processing Limitation** – we ensure that personal data is processed in a lawful and responsible manner, and such to ensure that processing is not excessive.
- **Purpose Specification** – we shall lawfully collect and process your personal data for a defined purpose and in terms of the purposes contained in this statement. This also includes keeping your personal data for only as long as necessary for the defined purposes or as required by law, or lawful business purpose, or where you have consented to the retention for longer time periods.
- **Further Processing Limitation** – we will only use your personal data for the purposes that we disclosed and you expect us to use it for. Where a processing activity is seen as further processing (i.e. an additional purpose has been decided on for processing personal data) and this new purpose is inconsistent with the original purpose (original reason we collected personal data), we will make sure that our processing activities meet the requirements of the applicable data protection laws.



- **Information Quality** – in conjunction with you, the owner of the personal data, we will take reasonable and practicable steps to ensure that your personal data is accurate, complete, updated and not misleading.
- **Openness** – we will be open, clear and honest with you on how and why we process and protect your personal data.
- **Data Subject Participation** – we have processes in place for you to access, correct, delete, object to certain processing activities and exercise your rights in terms of the applicable data protection laws as it relates to your personal data.
- **Security Safeguards** – we will apply and follow appropriate and reasonable, technical and organisational measures to make sure that the confidentiality, integrity and availability of your personal data is maintained throughout its lifecycle. These measures will also be applied to protect personal data against loss, damage, unauthorised destruction or unlawful access.

### What is personal data, and what personal data do we collect, have or compile about you?

Personal data or personally identifiable information is information which identifies you as an individual. People and Culture processes your personal data for various reasons which includes:

- Name, surname, nationality, race, gender, contact information, date of birth, national identity and/or passport information, marital status, bank account and tax information;
- recruitment information such as your CV, educational information and training, current and previous employment related records, credit record and fraud prevention checks, database registers for dishonest and/or dismissed employees (where applicable), criminal records, social media checks (where applicable), remuneration package and bonus information, employment start date, employee number, offer of employment and employment contract, reference letters and checks;
- your personal opinions as expressed in surveys or appraisals, performance objectives and reviews, performance and leadership ratings, awards, disciplinary matters and outcomes, expense claims, travel claims and time sheets, flexible working arrangements, leave balances, and periodic background checks for regulatory compliance or fraud prevention reasons;
- photographs and other visual images of you for biometric purposes or when captured by office CCTV cameras;
- political persuasion or trade union membership;
- directorships and other financial interests;
- health and disability related information (for medical aid purposes, or reasonable accommodation of any disabilities);
- personal data about your dependent family members (including nominated beneficiaries) such as their names, surnames, dates of birth and health related details if relevant for medical aid purposes and their financial interests if relevant for financial regulatory compliance, anti-money laundering checks or independent auditing purposes as well as for outside business interest declarations;
- contact details, names and surnames of persons nominated by you as emergency contact persons.

We may process similar or related information depending on your role and position within the organisation while employed or engaged by us. The personal data mentioned above is not an exhaustive list, and we may update it for the legitimate business interest or legal purposes for which it is processed from time to time.

Please ensure that you have the necessary authority to provide us with the personal data about any third party (such as your next of kin) and that, where applicable, you bring this notice to their attention.



## **Why do we need to process your personal data?**

Most commonly we will process your personal data in the following circumstances:

- Conclusion or performance of a contract to which you are party to.
- Comply with applicable laws and regulations.
- Legitimate Interest: We may process your personal data for statistical and research purposes, strategic and organisational planning, and management of our workforce generally. We engage with governmental, social and industry bodies on various initiatives from time to time, conduct ongoing research and voluntary employee engagements. Where it is necessary for legitimate interests pursued by us or a third party, your interests and fundamental rights do not override those interests.

We may process special personal data about you where it is necessary for purposes relating to your employment or applicable legislation. We may also process this information to institute or defend legal claims. We limit access to this information to those who need to access it, and where possible remove all personal identifiers from such information.

## **How do we obtain your personal data?**

The Bank prefers to collect all personal data directly from you. However, there are certain circumstances wherein it will collect from third parties or publicly available sources.

The position you apply for with us as a financial institution requires honesty and integrity. Where permitted by law, we may use third parties to perform risk, integrity, regulatory and related background screening checks. The content of the background check information varies by country in order to comply with local requirements. Where appropriate, these types of information will be collected with your prior knowledge, and consent may be required from you.

## **Monitoring of electronic communications**

As an organisation, we communicate through different methods and channels. Where allowed by law, we may record and monitor electronic communications provided to you by the Bank to make sure that they comply with our legal and regulatory responsibilities and internal policies.

## **Where do we keep your personal data?**

Most of the personal data about all employees of the Group companies is held by P&C. Employees can view some of their own information via the People and Culture management systems and applicant profiles created in the relevant careers portals.

Employees are encouraged to regularly update their personal data through the approved Group provided mechanisms. In situations where information cannot be viewed and updated by yourself, you should request assistance from the P&C Operations department by contacting 0861 123 444 or via email at [PeopleandCultureOperations@standardbank.co.za](mailto:PeopleandCultureOperations@standardbank.co.za). Personal data contained in hard copy (paper) format is also kept secure and safe, and may be made available to you upon request.



## How do we keep your personal data secure?

The security of your personal data is important to us. We have implemented appropriate and reasonable technical and organisational measures to prevent loss, unauthorised destruction, damage or access to your personal data by unauthorised persons.

It is your responsibility to ensure that you share your personal data over the authorised channels provided by P&C. The Group will not be held liable if an employee shares their personal data through unauthorised channels and such information is compromised by an unauthorised third party.

## Who do we disclose your personal data to and why?

### Group entities or affiliates and clients:

The Group comprises of different member entities or affiliates located in different jurisdictions where the Bank has presence. Personal data may be shared with such member entities or affiliates to the extent that may be reasonably required for business purposes and/or applicable laws.

### Outsourced service providers:

Where we have business operations that are supported by other organisations, and we need to share certain personal data with them for the purposes of the services that they provide. Some service providers may be located in countries different to yours.

We have agreements in place with such third parties which require them to protect all personal data in accordance with applicable laws and regulations, as well as Group policies.

### Law enforcement agencies and tax authorities:

Where obliged by law to do so, we may disclose your personal data to regulatory authorities, law enforcement, revenue agencies, and their officers and agents.

### Safeguards when we share your personal data:

When we do share personal data with a data processor (also known as an operator) we ensure that we have a lawful basis for doing so by:

- having a formal vetting procedure that we follow to assess the data processor's ability to look after all personal data shared with them;
- ensuring we have a written contract in place with them to apply appropriate safeguards to protect personal data in a manner that provides us with sufficient guarantees as to the security of that personal data;
- have a formal procedure that we follow to consider and approve the transfer beforehand; and
- undertaking ongoing monitoring of the relationship with the data processor.



## **Transferring your personal data outside your country**

We may need to transfer the personal data we have about you to other countries for conclusion of or performance of a contract to which you are party to, to comply with our regulatory obligations or manage the business of the Group's companies. It is possible that we may need to transfer your personal data to a country that is not considered by an applicable regulatory body to provide an adequate level of protection for personal data. Where this is the case, we will put in place appropriate measures to ensure that your personal data is adequately protected.

## **How long we keep your personal data for**

Where the law permits and taking into consideration our business requirements as a Group we only hold personal data for as long as necessary for the purposes that it was obtained. Thereafter, all such personal data will cease to be processed and may be deleted, archived, or anonymised. In certain instances, personal data may be kept for statistical purposes to enable the management of the organisation. In such case, we will put in place appropriate safeguards to protect the record from being used for other purposes.

## **Your rights**

The Group values your trust and wants you to be familiar with the rights available to you, and how you can exercise them. You have the right to:

- access, update and correct the personal data we hold about you;
- request that we delete your personal data, where appropriate;
- restrict the processing of your personal data, where appropriate;
- object to processing of personal data, where appropriate;
- opt out of direct marketing;
- where appropriate, not be subjected to a decision based solely on automated processing of your personal data that may create legal consequences or may significantly affect you;
- question the logic of the outcome of the automated processing of your personal data; and
- lodge a complaint with the relevant data protection supervisory authority.

In certain circumstances we may not be able to process some of your above-mentioned requests, i.e. your rights may be limited based on the following:

- if we have compelling legitimate grounds for the processing of the personal data;
- for the establishment, exercise or defence of a legal claim;
- for public interest; and
- for compliance with our legal obligation/duty.



### **Changes to our Privacy Statement**

Any changes we may make to this Employee Privacy Statement in the future will be posted on this page. The latest version of this Employee Privacy Statement will replace all earlier versions of it, unless stated differently.

### **Queries and complaints**

If you have any queries or complaints about your privacy, please contact the People and Culture Data Privacy Office at [myprivacy@standardbank.co.za](mailto:myprivacy@standardbank.co.za)