

## GLOBAL PRIVACY POLICY

This **Global Privacy Policy** provides information as to:

### 1. WHEN IBI PROCESSES PERSONAL DATA

IBI's Processing of Personal Data occurs only in the following scenarios:

- from its **employees** for workforce management purposes;
- from **potential hires** in the course of recruitment;
- from **website visitors** for the purposes of operating and improving the website;
- from **business individuals** for client relationship management (CRM);
- **on behalf of IBI Group clients** pursuant to contractual requirements; and
- from **subscribers** to subscription services, including software as a service products.

### 2. YOUR RIGHTS

A. The process to exercise protection rights regarding Personal Data retained by IBI, includes:

- Individual access;
- Rectification, as appropriate;
- Objection to use;
- Restriction of processing; and
- Exercising your rights.

B. Your rights relating to Sensitive Personal Data such as racial or ethnic origin for the purposes of employment equity, health data for the purposes of accommodation or trade union membership for the purpose of labour relations.

## I THE IBI APPROACH TO PERSONAL DATA

### 1. Collection

IBI retains Personal Data either (i) directly as a Data Controller, or (ii) indirectly as a Data Processor, in the following ways:

- IBI Processes Personal Data obtained directly **from its employees** with **implicit consent** for the purposes of human resource management including hiring, employment, compensation, benefits, leave management, performance management, discipline and termination, as well as emergency contact purposes.
- **In the course of recruitment**, with proper notification and **implicit consent**, IBI may use internet and commercial searches to perform due diligence on candidates strictly in relation to data relating to recruitment purposes.
- **As to our website**, IBI uses location-based services to present content. This includes using an IP address database maintained by a service provider to determine the IBI region that corresponds to the user's location. The purpose is to provide information relevant to the user's current position. This information, however, is never used to identify the user, or to share the information with anyone else. To enhance the content of its website, IBI uses cookies, which are small text files, stored on the user's computer during the site visit. Cookies often store the settings for a website, and help IBI make the user's experience more efficient by providing information about the visit. Cookies may be disabled which may then prevent the use of some features of the site. This **Global Privacy Policy** will always be easily accessed from the IBI website.
- **As to business individuals**, IBI employees may collect minimal Personal Data provided by individuals such that **implicit consent** is assumed, and limited to what is necessary to manage its relationships with clients.
- **As to its clients**, for whom IBI Processes Personal Data to which a client is Data Controller, IBI Processes such Personal Data exclusively under the instructions of the client in the context and **in accordance with the contract**.

## 2. Disclosure

IBI does not sell or otherwise disclose to third parties any Personal Data it holds save in the following exceptional circumstances:

- Should IBI receive a request from law enforcement authorities to provide Personal Data in its custody, it would only do so upon demonstration of lawful authority. If the Personal Data requested is held on behalf of a client, IBI will consult the client unless it is prohibited to do so by law.
- Strictly as permitted by law, IBI may disclose Personal Data to another organization where it is:
  - reasonable for the purposes of investigating a breach of an agreement or a contravention of the law that has been, is being or is about to be committed and it is reasonable to expect that disclosure with the knowledge or consent of the individual would compromise the investigation;
  - reasonable for the purposes of preventing, detecting or suppressing fraud and it is reasonable to expect that the disclosure with the knowledge or consent of the individual would compromise the ability to prevent, detect or suppress the fraud; or
  - necessary to identify an individual who is injured, ill or deceased, to a government institution or the individual's next of kin or authorized representative, with notification to the individual if the individual is alive.
- Strictly where express consent has been obtained by an individual.
- With respect to employee Personal Data, IBI may disclose Personal Data if it is necessary:
  - to establish, manage or end an employment relationship, as permitted by law.
  - in a prospective business transaction where IBI has entered into an agreement that:
    - restricts the use and disclosure of that Personal Data solely for purposes related to the transaction;
    - protects the Personal Data by security safeguards appropriate to the sensitivity of the Personal Data; and
    - if the transaction does not proceed, the Personal Data is returned to IBI or the recipient has destroyed it within a reasonable time.

## 3. Transfer

IBI may transfer Personal Data to third party service providers it engages to deliver certain goods and services such that the transfer may occur across sovereign borders. In all cases, transfers are subject to the following conditions:

- The transfer is solely for assisting IBI in its goods or services delivery or operations and under IBI instructions.
- The third party services provider has substantially agreed to the **Personal Data Contractual Clauses** requiring compliance with Personal Data protection laws (whether IBI transfers as a Data Collector to a Data Processor or as a Data Processor to a Data sub-Processor).
- As to the Personal Data it collects in the context of a Data Controller, IBI:
  - informs individuals, through this **Privacy Policy**, or through the website privacy statement, of the transfer abroad, as the case may be;
  - exercises due diligence in the choice of Data Processors to whom to transfer the Personal Data; and
  - monitors compliance through means including inspections and audits.
- As a Data Processor, IBI transfers client Personal Data:
  - exclusively pursuant to instructions from the client; and
  - with consent of the client in accordance with the applicable contract.

## 4. Security

IBI stores data (including Personal Data) using advanced technology for internet security. In particular,

- **All data** (including Personal Data) is protected according to the varying levels of risks through physical measures, such as secure areas and device storage, technical measures, such as encryption and audit trails for compliance with access controls, and organisational measures such as access based on the need-to-know and employee security through vetting and supervision.
- **Personal Data** is retained only for as long as it is necessary for the purposes for which it retained and in accordance with the **Personal Data Elimination Schedule**.
- Should IBI suffer a Personal Data Breach, it will implement the **Personal Data Breach Response Plan**.

## II PROCESSES TO EXERCISE PRIVACY RIGHTS AT IBI

### 1. Individual access

- All individual access requests to one's Personal Data must be sent to the DPO at [dataprotection@ibigroup.com](mailto:dataprotection@ibigroup.com).
- Any request for Personal Data Processed by IBI on behalf of a client will be redirected to the client.
- In respect of **employee related Personal Data relating to recruitment**, the DPO refers the request to the Global Director, Human Resources to respond.
- In respect of **individual client Personal Data**, the DPO refers the request to the applicable IBI Project Director for such project/client.
- In respect of **website Personal Data**, the DPO refers the request to the Global Director of Marketing and Communications.
- In all cases, the DPO provides legal advice regarding responses.

IBI responds to individual access requests, within one month:

- free of charge, unless the volume or the complexity of the request require a longer process, in which case IBI will inform the requester, within one month of:
  - the reasons for an extension;
  - the applicable reasonable charge required to be paid by the requestor to cover administrative costs in respect of the request; and
  - the fact that IBI will proceed with the access request process only upon receipt from the requestor of its payment of the reasonable charge.
- responding as follows to the request if any of the following reasons apply:
  - IBI does not have the Personal Data requested;
  - IBI categorizes the request as frivolous, vexatious or excessive; or
  - IBI believes access would adversely affect the Personal Data privacy rights of others.
- to the extent a request has not been refused or payment from the requestor, as applicable, has been received, with the following information:
  - the purposes of the Personal Data Processed;
  - details of the third party service providers to whom such Personal Data has been or will be transferred under an active contract with IBI;
  - the right to request rectification or erasure of Personal Data and the process for it; and
  - the right to object to Personal Data Processing, as applicable; and
  - the right to lodge a complaint with a supervisory authority.
- to the extent a request has been refused or payment of administrative costs is required:
  - reasons for the refusal or charges, as applicable; and

- the right to lodge a complaint with a supervisory authority.

## 2. Rectification

- Rectification requests are to be sent to the DPO at [dataprotection@ibigroup.com](mailto:dataprotection@ibigroup.com)
- IBI will rectify inaccurate Personal Data and provide a supplementary statement if Personal Data is incomplete, in each case free of charge and, generally, without undue delay and at the latest within one month.
- IBI will give reasons if it refuses the request to rectify.
- The DPO refers the requests in accordance with the process for access, above.

## 3. Right to object

- An Individual has the right withdraw consent to a previously consented use of Personal Data, at any time.
- Should IBI choose to Process Personal Data it has collected with consent for other reasons than those for which they were collected, for example demographic data to ensure diversity in the workforce, it will recognize the right for individuals to object and withdraw consent.
- Any objection to the use of Personal Data shall be made to the DPO who will assess the application of the right to object and IBI shall as soon as is reasonably practicable cease the process objected to, as justified.

## 4. Restriction on processing

- IBI will inform third party service providers in its contracts with them of the restrictions on Processing of Personal Data relating to an individual.

## 5. Challenging compliance

- An individual about whom IBI holds Personal Data may challenge compliance with Personal Data rights by filing a complaint with the DPO at [dataprotection@ibigroup.com](mailto:dataprotection@ibigroup.com)
- The DPO shall investigate the complaint in consultation with the office responsible for the use of the Personal Data. Should the complaint be well-founded, IBI will take all appropriate measures to resolve the complaint and, if necessary, amend its practices as necessary.

## III Sensitive Personal Data

Certain types of Personal Data are of such sensitivity to be recognized and afforded higher protection. IBI classifies such data as Sensitive Personal Data.

IBI processes the following categories of Sensitive Personal Data:

- records of criminal convictions as necessary to determine security clearance and otherwise as required pursuant to immigration laws;
- ethnicity or race for **voluntary** participation in IBI Group Equal Employment Opportunity/Employment Equity initiatives, to seek fair representation in its workforce.
- health information as necessary to respond to accommodation requests and provide compensation and medical benefits.

In all cases, such Sensitive Personal Data is subject to special conditions:

- it is collected with **explicit consent**, specific, informed, unambiguous, and freely given, in writing and signed;
- consent may be withdrawn and IBI will immediately comply by deleting the Personal Data and inform third party service suppliers, if applicable as to the restrictions upon Processing.
- safeguards applied to this Personal Sensitive Data are commensurate to its level of sensitivity.

## CONTACT

For more information, contact the DPO at [dataprotection@ibigroup.com](mailto:dataprotection@ibigroup.com).