

Privacy policies & Cookies

[Client data protection policy](#)

[Website privacy notice](#)

[Global online recruitment portal terms and conditions and recruitment privacy notice](#)

Client data protection policy

This Client Data Protection policy ("**Policy**") applies to personal information about you, any of your employees, officers, directors, agents, contractors or consultants or any of your customers, suppliers or any other relevant individual that you engage with in the ordinary course of business ("**Client Business Personnel**") held by MJSC and, to the extent that the Data Protection Legislation applies to the processing of such information, held by other members of the MJSC Group. For all intended purposes, the Group hereto refers to any and all business operations being conducted within South Africa, United Kingdom, Europe and Africa in terms of our overseas offices.

In this Policy:

"**Data Protection Legislation**" means all applicable legislation relating to privacy or data protection in force from time to time, including any statute or statutory provision which amends, extends, implements, consolidates or replaces the same, and in particular to the extent applicable and without limitation the EU General Data Protection Regulation 2016/679 ("**GDPR**"), the GDPR as it forms part of the domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018, the Data Protection Act 2018 and the South African Protection of Personal Information Act, 2013 ("**PoPIA**"). The terms "personal data", "controller", and "process" (and its derivatives) shall have the meanings given to them in the Data Protection Legislation.

"**MJSC Group**" means MJSC (Pty) Ltd and MJSC Pro Ltd and other partnerships, corporations and undertakings which are authorised to carry the name "MJSC"; and a "member of the MJSC Group" has a corresponding meaning.

Using your information

We may collect and process information relating to you and your Client Business Personnel to provide our services to you. We shall process any information we collect in accordance with Data Protection Legislation and the provisions of this Policy.

Your Information

The information referred to above includes personal data, which means information that can be used to identify a natural person, including (but not limited to) the following types of personal information:

- contact information, such as an individual's home or work address and contact details (including mobile telephone number);
- date of birth, marital/civil partnership status, details of dependants and next of kin;
- financial information (including bank details, tax rates and information in relation to investments);
- employment status;
- information about an individual's professional qualifications;
- pay records and national insurance number or identification number;

- other information about an individual that you or they disclose to us when communicating with us;
- details of any complaints or concerns raised by you or them;
- information we obtain from the instructions you give to us;
- information we collect when you and your Client Business Personnel communicate with us or any other time you or they contact us; and
- information we obtain from third parties, such as information that we obtain when verifying details supplied by you. This information obtained from other third-party organisations may include fraud prevention agencies and information which is collected from publicly available sources.

Some of the information that we collect about you and your Client Business Personnel may include special categories of personal data (such as information about racial or ethnic origin, criminal or alleged criminal offences or health and lifestyle). We will usually seek separate permission from you or them in writing to process these special categories of personal data.

If you fail to provide us with this information, or you or your Client Business Personnel object to us processing such information ((see "**General Rights**") for more information about your rights in relation to your information) the consequences are that we may be prevented from providing our services to you or continuing to manage your matter(s) with us.

Our use of your information

We may collect, record and use information about you and your Client Business Personnel, and the services we provide to you, in physical and electronic form and will hold, use and otherwise process the data in accordance with the Data Protection Legislation and as set out in this Policy. This may include sharing this information with third parties and transferring it abroad or across borders. More information about sharing and transferring such information is set out below.

We may process any information we hold about you and your Client Business Personnel for several business purposes. Examples of the types of uses of such information are set out below:

- to provide our services to you;
- to administer and operate your client account(s) and matters;
- to monitor and analyse the conduct of your client account(s) and matters;
- to assess any billing matters or credit decisions;
- to enable us to carry out statistical and other analysis and to meet our legal or regulatory obligations;
- for our reasonable commercial purposes (including in connection with our insurance, quality control and administration and assisting us to develop new and improved services);
- to confirm your or their identity and carry out background checks, including as part of our checks in relation to anti-money laundering, compliance screening and to prevent fraud and other crimes;
- to follow up with you or them after you request information to see if we can provide any further assistance;
- to comply with any requirement of applicable laws or regulations;
- to fulfil our obligations under any reporting agreement entered into with any tax authority or revenue service(s) from time to time;
- to check your instructions to us;
- to circulate attendee lists to other attendees of our events;

- to monitor, record and analyse any communications between you or them and us, including phone calls to analyse, assess and improve our services to you, as well as for training and quality purposes;
- to prevent or detect abuse of our services or any of our rights (and attempts to do so), and to enforce or apply this Policy and/or any other agreement and to protect our (or others') property or rights;
- in the context of a sale or potential sale of a relevant part of our business, subject always to confidentiality obligations;
- if instructed to do so by you or them or where you or they give us consent to the use and/or processing involved; and
- to bring to your or their attention (in person or by post, email or telephone) information about additional services offered by us and/or the MJSC Group, which may be of interest to you or them, unless you or they indicate at any time that you or they do not wish us to do so.

Lawful grounds for using your information

We have described the purposes for which we may use information about you and your Client Business Personnel. We are permitted to process such information in this way, in compliance with the Data Protection Legislation, by relying on one or more of the following lawful grounds:

- you or they have explicitly agreed to us processing such information for a specific reason;
- the processing is necessary to perform the agreement we have with you or them or to take steps to enter into an agreement with you or them;
- the processing is necessary for compliance with a legal obligation we have; or
- the processing is necessary for the purposes of a legitimate interest pursued by us, which might be:
 - (i) to ensure that our matters are well-managed;
 - (ii) to prevent fraud;
 - (iii) to protect our business interests;
 - (iv) to ensure that complaints are investigated;
 - (v) to evaluate, develop or improve our services; or
 - (vi) to keep our clients informed about relevant services.

In relation to any processing of special categories of personal data, we will generally rely on obtaining specific consent to process such information, although it may be necessary for us to use certain information to comply with our legal obligations as a regulated entity (such as in relation to an alleged offence). Where you or your Client Business Personnel have consented to our processing of such information (including special categories of personal data) you or they may withdraw such consent at any time, by contacting us using the contact details set out in "**Contacting Us**" below.

Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described above is applicable.

Automated processing

We do not carry out automated decision-making or profiling in relation to our clients.

Information sharing

Sharing your information with others

We keep all client information confidential. However, to be able to service our clients' needs to the best of our ability, we may share any information you provide to us with the MJSC Group entities and their support service or data providers, wherever located.

We may also provide third party service providers access to client information where they support or provide services to us. We will ensure that if we share information with, or provide access to, third party service providers, any such disclosure or access is at all times in compliance with Data Protection Legislation under agreement and for operational purposes only.

If you or your Client Business Personnel have provided information to MJSC Group entities those entities may also share that information with us.

The recipients, or categories of recipients, of your information, or information relating to your Client Business Personnel, may be:

- any revenue service or tax authority, including HMRC or SARS (respective country financial institutions), if obliged to do so under applicable regulations, we may also have to report your account(s) to the necessary tax authorities;
- your other advisers (including, but not limited to, accountants or other professional advisers) where authorised to do so by you;
- UK, EU, South Africa and overseas regulators, courts and authorities in connection with their duties (such as crime prevention);
- fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. We and fraud prevention agencies may also enable law enforcement agencies to access and use your information to detect, investigate and prevent crime;
- third party service providers who support or provide services to us;
- attendees of our events where we circulate names, corporates names and corporate email addresses on an attendee list for our events;
- anyone to whom we may transfer our rights and/or obligations under this Policy; and
- any other person or organisation after a restructure, sale or acquisition.

If we, or a fraud prevention agency, determine that you and/or your Client Business Personnel pose a fraud or money laundering risk:

- we may refuse to provide the services you have requested, or we may stop providing existing services to you; and
- a record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you or them.

Sharing third party information with us

If any information which you, your Client Business Personnel provide to us relates to any third party, by providing us with such information you or they confirm that you or they have obtained any necessary permissions from such persons to the reasonable use of their information in accordance with this Policy or are otherwise permitted to give us this information on their behalf.

Transferring your information outside South Africa, the UK or EEA

Information about you, your Client Business Personnel in our possession may be transferred to other countries ((particularly to the entities in the MJSC Group and their agents in different countries which may include countries outside South Africa, the United Kingdom or the European Economic Area ("EEA"))) for any of the purposes described in this Policy.

You and they understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information they hold and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, courts regulatory agencies and private persons, because of applicable governmental or regulatory inquiry, court order or other similar process. In addition, several countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

When we, or our permitted third parties, transfer information we or they will impose contractual obligations on the recipients of that data to protect such information to the standards required in the UK, South Africa or EEA as appropriate. We or they may require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where:

- the transfer is to a country deemed by these governments to provide adequate protection of your information;
- you, your Client Business Personnel and Client Business Personnel have consented to the transfer, or
- such transfer is otherwise permissible under Data Protection Legislation (for example if we are required to provide such information by law).

Your rights in relation to your information

General rights

You and your Client Business Personnel have several rights concerning the way that we use your information. You are responsible for ensuring that your Client Business Personnel are aware of these rights, which comprise:

- to request access to, or a copy of, any personal data we hold about you or them;
- to request the rectification of your or their personal data, if you or they consider that it is inaccurate;
- to request the erasure of your or their personal data, if you or they consider that we do not have the right to hold it;
- to object to your or their personal data being processed for a particular purpose or to request that we stop using your or their information;
- to request not to be subject to a decision based on automated processing and to have safeguards put in place if you or they are being profiled based on their personal data;
- to ask us to transfer a copy of your or their personal data to another party where technically feasible and otherwise required by applicable regulations;
- to withdraw, at any time, any consent that you or they have previously given to us for our use of your or their personal data; or
- to ask us to stop or start sending them marketing messages at any time.

Any request for access to or a copy of personal data must be in writing, and we will endeavour to respond within a reasonable period and in any event within **one month** in compliance with Data Protection Legislation. We will comply with our legal obligations as regards any individual's rights as a data subject.

If you would like to contact us in relation to any of the rights set out above, please contact us using the contact details in the "**Contacting Us**" section below.

Retaining your information

We will only keep the information we collect about you and your Client Business Personnel on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required.

If you terminate your relationship with us, a matter comes to an end, we decline to act on a matter, or you decide not to go ahead with a matter, we may still keep your information.

Sending you marketing information

The MJSC Group may use your information from time to time to inform you and your Client Business Personnel by letter, telephone, text (or similar) messages, email or other electronic means, about similar services (including those of third parties) which may be of interest to you or them.

You and your Client Business Personnel may, at any time, request that we cease or do not send such information by one, some or all channels, by contacting us using the contact details set out below or by clicking "unsubscribe" for the relevant communication.

Contacting us

If you or any of your Client Business Personnel wish to exercise any of the rights relating to your information set out above, or if you have any questions or comments about data protection, or you wish to raise a complaint about how we are using your information you can contact us using the following details, or any other details notified to you from time to time:

- Write to us for South Africa at The Lifestyle Riverfront Office Park, Bosbok Avenue, Randpark Ridge, 2169 or email us at info@mjscpro.com or call at +27(0) 010 054 5111; or
- Write to us for the United Kingdom and Europe at United Kingdom: 78 York Street, London, W1H 1DP or email us at info@mjscpro.co.uk or call at +44(0)203 5760720.
- Details of all our offices are available on our website, www.mjscpro.com or www.mjscpro.co.uk

If you and/or your Client Business Personnel have any concerns about our use of your or their information, you and they also have the right to make a complaint to:

- the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK: Water Lane, Wycliffe House Wilmslow, Cheshire SK9 5AF, website: <https://ico.org.uk>, helpline +44 303 123 1113;
- the European Data Protection Board ("**EDPB**"), which regulates and supervises the use of personal data in the EU: Rue Montoyer 30, B-1000, Brussels; and
- the Information Regulations of South Africa ("**IRSA**"), which regulates and supervises the use of personal data in South Africa: 27 Stiemens St, Braamfontein, Johannesburg, website: <https://inforegulator.org.za/>, telephone number +27 10 023 5200.

We may make changes to this Policy and how we use your information in the future. If we do this, we will ensure that the version available on this website (www.mjscpro.com and www.mjscpro.co.uk) is the current version.

Latest Version: July 2023

Website privacy notice

We at MJSC ("**MJSC**", "**we**", "**us**", "**our**") operate our websites www.mjscpro.com and www.mjscpro.co.uk (the "**Sites**"). "**MJSC Group**" means the Company as registered in South Africa under registration number 2017/208244/07 and in the UK with registration number 12150815 and other partnerships, corporations and undertakings which are authorised to carry the name "MJSC"; and a "member of the MJSC Group" has a corresponding meaning.

It is important to us that we protect the privacy of personal information and for you to know what type of information we collect and how we treat information we may receive from you.

We detail below how we collect personal information about you from your use of the Site.

The types of information we collect from you

We may collect and store the following types of personal information about you when you use the Sites or by corresponding with us (for example, by email). This includes information you provide when registering to use the Sites or sharing any data via our social media functions.

The information given to us may include:

- your title, name, your age, date of birth, your address, telephone number and your email address;
- other personal information including special categories of personal data (e.g. racial or ethnic origin, political opinions, religious or philosophical belief, trade union membership, genetic or biometric data, health, sex life or sexual orientation);
- information in connection with communications you send us, for example to report a problem, recruitment queries and legal enquiries; and
- details of the functions and services you use on the Site.

Automated collection of information

Each time you use the Sites, we may automatically collect the following types of information by using cookies, server logs and other similar technologies:

- **Technical information:** This means information about the type of internet browser and operating system you use, your internet protocol (IP) address, your browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you are using. We use this information to help provide a good user experience on the Site.
- **Log and usage information:** This means information about how you use our Sites, your visits to the Sites and traffic data. We use this information to help us understand how users use the Sites and to improve user experience.

- **Marketing and Communications information:** We track when you receive and read marketing communications from us in order to improve our marketing services, provide you with more relevant information and improve the quality of our marketing materials.
- **Profile information:** This is information collected progressively when you visit our Sites, including your referral website, pages you visit, actions you take, patterns of page visits and information from forms you may fill in on the Sites.
- **Third party information:** We may receive certain technical or usage information about you from third party analytics providers such as Google.

Legal basis for processing

Our processing of your personal information is necessary:

- (i) for the performance of contracts to which you will be a party and in order to take steps at your request prior to you entering into those contracts; and
- (ii) for the purposes of legitimate interests pursued by us.

Legitimate interests

Our processing of your personal data is necessary for the purposes of legitimate interests pursued by us, namely:

- (i) collecting user information to provide you with a safe, smooth, efficient and customised experience;
- (ii) to make sure you receive updated information on MJSC's business activities data base;
- (iii) to provide the services you have requested and to provide them efficiently;
- (iv) to ensure that the content on the Sites is presented in the most effective manner for you and your device;
- (v) to allow you to participate in any features on the Sites when you choose to do so; and
- (vi) for our own marketing and research.

Purposes of processing and use of your personal information

We may use your personal information specifically to:

- subscribe you to our newsletters or updates to which you are provided with an unsubscribe option;
- consider your application where you have applied for a position with us; and
- tell you about our services and provide you with targeted marketing in relation to our services.

If you are an existing user of our services, we may only contact you with information about services like those we provide. If you are a new user of our services, we may contact you with information about our services more generally.

Disclosure of personal information

Except as expressly set out in this Privacy Notice we do not share, sell, or lease personal information about you to any third parties for their marketing use.

We may disclose personal information to provide our services, respond to legal requirements, enforce our policies and protect our rights and property. The personal information you provide to us may also

be shared with the MJSC Group if this is necessary to provide you with our services, respond to your inquiries or for any other related purposes.

We may also provide third party service providers access to information where they support or provide services to us. We will ensure that if we share information with, or provide access to, third party service providers, any such disclosure or access is at all times in compliance with data protection legislation.

We may also share your personal information with:

- the MJSC Group;
- third parties who support our information technology or handle mailings or events on our behalf;
- law enforcement agencies, other governmental agencies or third parties if we are required by law to do so, or in other limited circumstances (for example if required by a court order or regulatory authority, or if we believe that such action is necessary to prevent fraud or cyber-crime or to protect the Site, our technology assets or the rights, property or personal safety of any person); and
- other business entities should we plan to merge with or be acquired by that business entity, or if we undergo a re-organisation with that entity.

Your rights

You have a number of rights concerning the way that we use your information. At any time, you have the right to:

- request access to or a copy of any personal data we hold about you;
- request the rectification of your personal data, if you consider that it is inaccurate;
- request the erasure of your personal data, if you consider that we do not have the right to hold it;
- object to your personal data being processed for a particular purpose or to request that we stop using your information;
- request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data;
- ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible; and
- ask us to stop or start sending you marketing messages at any time by using the below contact details.

Any request for access to or a copy of your personal data must be in writing, and we will endeavour to respond within a reasonable period and in any event within one month in compliance with applicable data protection legislation.

Security and storage of your information

Although we maintain physical, electronic, and administrative safeguards to protect your personal information from unauthorised or inappropriate access, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted to us or provided through the Sites.

Personal information that you submit may be sent to, and stored on, secure servers owned by or operated for us. If we collect personal information about you through the use of the Sites we will only retain that information for as long as is reasonably necessary to fulfil the activity requested, or as may be required by law.

Your personal information may be transferred to, and stored at, a destination outside the operational areas (South Africa, UK or European Economic Area ("EEA")) and may also be processed by staff operating outside these countries who work for us, the MJSC Group, or for one of our service providers, who are all under strict contractual obligations and binding terms.

When we, or our permitted third parties, transfer your information outside these countries, we or they will impose contractual obligations on the recipients of that data to protect your information to the standard required. We or they may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where:

- (i) the transfer is to a country deemed to have provide adequate protection of your information through legislative statues and / or conventions;
- (ii) where you have consented to the transfer; or
- (iii) where such transfer is otherwise permissible under Data Protection Legislation (for example where we are required to provide such information by law).

Certain features of the Sites will allow for social networking. You should ensure when using these features that you do not submit any personal data that you do not want to be sent, collected or used by other users, such as profile details or email address.

Opt-Out or Unsubscribe

You also have the option of "unsubscribing" from our mailing list for newsletters, alerts and updates at any time, thereby disabling any further such email communication from being sent to you.

To unsubscribe just send an email to info@mjscpro.com or info@mjscpro.co.uk with the word 'remove' in the subject line and the email address that you wish to be removed within the email. In addition, each electronic mailing we send you will contain details of how you can unsubscribe.

Please note that it may take up to one month to action your request, during which time you could receive various other newsworthy information and /or service offerings.

Automated processing

We do not carry out automated decision-making or profiling in relation to your personal information.

Cookies

Our use of cookies

MJSC would like to set and access cookies and similar technology (referred to here as "**cookies**") on your device to obtain information about how you access and use the Sites, to enhance your experience on the Sites and to connect you to social media. This helps us to provide you with a good experience and allows us to improve the Sites. Unless you have adjusted your browser settings so that it will refuse cookies, the Sites will set strictly necessary cookies when you load and navigate it.

We will not set any cookies through this Sites, other than those that are necessary to make the Sites work, without your consent.

You can give consent to cookies, or withdraw any consent you have previously given, through our cookies tool or your browser settings - for more detail, please see *Refusing or restricting cookies* below. Please note that, to refuse cookies that are set by third parties, you must use your browser settings or visit the third-party site and follow the instructions in their cookie notice.

What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit sites. Cookies are then sent back to the originating sites during your browsing session or on each subsequent visit, or to another site that recognises that cookie.

The cookies we set do lots of different jobs, such as to help us to improve the Sites and deliver a better and more personalised service, remember your preferences, and generally improve the user experience.

You can find more information about cookies at <http://www.allaboutcookies.org/>

The cookies we use on our Sites can be categorised as set out below:

- *Strictly necessary cookies* – enable core functionality such as security, network management, and accessibility. They also make our Sites easier to use by accelerating its display through load balancing. You can disable these by changing your browser settings, but this may affect how the Sites functions. You cannot disable these using our cookies tool.

Performance cookies – these cookies are set to provide enhanced functionality and make our Sites easier to use, by remembering your preferences, including the preferences you have indicated on our cookies tool.

- *Targeting cookies* – these cookies may be set through our Sites by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store information about your actual identity (such as your name), but they do store information based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience advertising, but it will be less targeted to you. Some of the cookies listed below, such as the YouTube cookie in relation to video content, are third-party cookies that cannot be turned off using our cookies tool. In order to remove these cookies, you will need to visit the third-party sites and follow the instructions in their cookie notices. Alternatively, follow the instructions under “refusing or restricting cookies” below to turn off these cookies using your browser settings.

- *Tracking cookies* – If you click through from one of our marketing or events emails, we use cookies or similar technologies to track you in two ways:

1. Email tracking: we log or track the following in marketing or events emails we send to you: if you open the email either by downloading images in the email or clicking in a link, if you click on a "view it as a web page" link in the email, if you click on any web link and if you click unsubscribe. Clicking on event RSVP buttons will also pass a tracking code so we can record your choice in our database to help us manage the event. If you do not wish to enable such tracking, please do not download any images in such emails, or

alternatively please unsubscribe from our mailing lists by updating your choices on our preference page or by following the link at the bottom of each email.

2. Website tracking: When you click through from one of our marketing or events emails, we place the cookies listed below to connect your e-marketing journey with your activities on our Site. You may refuse these cookies using your browser settings, or you may switch such cookies off using our cookies tool.

Cookies can also be categorised in accordance with how long they are saved on your device: "session cookies" are short-term cookies that are only saved on the device's memory for the duration of a user's visit to the Site, whereas "persistent cookies" remain saved in the device's memory for a set period, even after the browser session has ended. The expiry period for each cookie is set out above.

Refusing or restricting cookies

You may refuse to accept or withdraw your previous consent to cookies.

Contacting us

If you have any questions about this Privacy Notice, please contact us at reception@mjscpro.com or info@mjscpro.co.uk.

Changes to this Notice

We may amend this Privacy Notice at any time by posting the amended terms on the Sites. All amended terms will automatically take effect immediately on posting. Please check this Privacy Notice periodically to inform yourself of any changes. If you do not accept the changes made to this Privacy Notice you should immediately stop using the Sites.