



<b>Document Title</b>	Privacy Notice – External		
<b>Document Number</b>	n.a	<b>Revision Number</b>	01
<b>Type of Document</b>	Form	<b>Revision Date</b>	1/11/2021

## FORM 005: Privacy Notice – External

### Externally Published Privacy Notice - Effective June 30, 2021

#### Overview

- BroadReach Group including BroadReach Health Development, Vantage Health Technologies and all other affiliates and subsidiaries therein understands the importance of protecting your personal information. We are committed to being transparent and fair when we collect and use your personal information and to complying with the data protection laws that apply in the countries where we operate. BroadReach Group has adopted the principles and requirements of the European Union’s General Data Protection Regulation (GDPR) and South Africa’s Protection of Personal Information Act (POPIA) as the basis for its general privacy practices.
- This Notice describes our general privacy practices and applies to the information we collect through our websites or when you communicate with us by email, phone, or other means. When you access or use our websites, services, and software, you acknowledge that you have been presented with this Privacy Notice and understand its contents. Your use of our websites is subject to this Privacy Notice and any applicable Terms of Use.
- This Privacy Notice applies to all users of our websites around the world. Unless stated otherwise, this Notice does not apply to any third-party sites that may link to, or be accessible from, our websites.

#### Personal Information We Collect and How We Collect It

- In this notice, the term “personal information” refers to information that identifies a living individual or can be used by itself or in combination with other information to identify a living individual.
- BroadReach Group collects the personal information we need to provide our services.
- We collect personal information when you voluntarily provide it to us. For example, you may provide:
  - Your name, email address and information about your areas of interest when you sign up to receive newsletters, updates, and other information from us
  - Your contact information and any other information you choose to include in emails or other electronic messages to us or if you contact us through the website
  - Personal information contained in articles, photos, videos, feedback, comments, or other content you post on our website or submit via online portals, forms, or surveys
- We also collect personal information automatically as you navigate through the Site, through your browser and the use of cookies and other tracking technologies, which allows us to store information about your connection and preferences and make your use of the site easier and more customized. The collected information may include:
  - Information about your website usage, such as time and date of visits, frequency of visits, pages viewed, resources downloaded and information about your Site usage and resource requests
  - Information about the devices and internet connections you use to access or use the Site, such as device type, operating system, browser type, domain, IP address and system settings for language, time zone, etc.
- For more information about the information we collect automatically, please read our complete Website Terms of Use.



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## How We Use and Share Your Personal Information

- BroadReach Group only collects and uses your personal information when we have a lawful basis for doing so. We use the personal information we collect to administer our websites, provide services, communicate with you, and facilitate changes in our business, as required by law or with your consent. For instance, we may use or disclose personal information for purposes of:
  - Responding to inquiries and fulfilling requests for information about BroadReach Group and our projects and services, including information you ask to receive by signing up for newsletters and alerts
  - Providing web and email content that reflects your interests, informing you about events, and targeting content and communications to you
  - Enabling you to apply for jobs or register as a consultant or vendor with BroadReach Group
  - Preventing malicious activity and unwanted communications and ensuring website security
  - Performing data analysis, audits, and fraud monitoring and prevention to enhance and improve our website, identify usage trends, determine program effectiveness, and carry out and expand our business activities
- We may share personal information as follows:
  - With our employees who need the information for the purposes described above
  - With third-party vendors and service providers who provide us with cloud storage, website hosting, data analysis, payment processing, information technology, auditing and similar services related to our business
  - When we believe disclosure is necessary and appropriate to prevent physical, financial, or other harm, injury, or loss, including fraud
  - With governmental or judicial authorities as required or ordered by those authorities or applicable laws or regulations
  - In connection with legal action, such as response to subpoenas or investigation of suspected illicit or illegal activities
  - Where we are bound by contract or law to enable a client or business partner to comply with applicable laws
  - With your consent or at your direction, such as when you choose to share information or publicly post content and comments on our websites
- BroadReach Group does not sell your personal information to any third parties or share it with any third parties for marketing purposes.
- In GDPR and POPIA terms, our lawful bases for processing your personal information are as follows:
  - To take steps at your request prior to entering into a contract with you, or to perform a contract with you
  - Where necessary for compliance with legal obligations
  - To pursue our legitimate business interests
  - In some cases, with your consent

## How Long We Keep Your Personal Information

- BroadReach Group keeps your personal information for as long as we need it to carry out the purpose for which it was collected, or as required by applicable laws and regulations. Afterward, it is securely destroyed and deleted from our databases.



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### How We Keep Your Personal Information Safe

- We use administrative, organizational, technical, and physical safeguards to protect the personal information we collect and process. Our security controls are designed to maintain data confidentiality, integrity, and an appropriate level of availability.

### Additional Information for Job Applicants

#### Personal Information We Collect and How We Collect It

- If you apply online for a job with BroadReach Group, or register online to be considered for future opportunities, BroadReach Group collects a broader range of personal information, including:
  - Your name, email address, mailing address and telephone numbers
  - Your education, employment history, work experience, skills, and qualifications
  - Whether you are over 18 years of age
  - Whether you are legally authorized to work in the relevant country
- We collect this information in several ways. Much of it is provided by you when you complete the application or registration forms. In addition, we may obtain information from your resume, CV, or any other documents you upload, or from your LinkedIn profiles. We may also seek information from third parties, such as references supplied by former employers.

#### How We Use and Share Your Personal Information

- We use this personal information to:
  - Manage and keep records of the recruiting process
  - Assess the qualifications and suitability of job candidates and make hiring decisions
  - Enable BroadReach Group to assess your qualifications and suitability for later opportunities
  - Comply with our legal obligations, such as our obligation to verify your legal eligibility to work in the country you applied to.
  - Respond to and defend against legal claims
- We may also process special categories of data, such as information about ethnic origin, sexual orientation, or religion, to monitor recruitment statistics and comply with legal reporting requirements. We may also collect information about whether an applicant has a disability requiring reasonable accommodation, to facilitate exercise of employment rights.
- We may share your personal information internally with people involved in the recruitment and hiring processes, and others who need access to the information to perform their jobs, including recruiters, HR staff, Procurement or Contract Management staff, IT staff, proposal staff, hiring managers and interviewers.
- We will not share your data with third parties unless they are involved in the employment process, such as former employers to obtain references or background-check providers to obtain necessary background checks.

#### How Long We Keep Your Personal Information

- If your application for employment is successful, the personal information we collect during the recruitment process will be transferred to your HR personnel file (electronic and/or paper) and retained during your employment and thereafter for the periods outlined in BroadReach Group’s Record Retention Policy that can be requested if required.



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- If your application for employment is unsuccessful, we will keep your personal information on file for as long as we are required to do so by applicable law. If you consent to allow us to keep your personal data on file beyond that period, we will hold it until you withdraw your consent or ask to have your personal information deleted, as described in the “Your Rights” section below. This allows us to consider you for hire for future positions that may become available.

## Data Subject Rights and Changes

### Your Rights

- If you are in the South Africa or the European Economic Area, you have the right to:
  - Access or request a copy of the personal information we hold about you
  - Obtain or have transferred to another processor a copy of certain personal information in a commonly used, machine-readable form
  - Object to processing for direct marketing, or to processing for scientific/historical research/statistical purposes, except where necessary for performance of a task carried out for reasons of public interest
  - Restrict processing of your personal information
  - Review your personal information for completeness or accuracy and ask to have your information corrected or completed as applicable
  - Have your personal information deleted from our files and data stores in certain circumstances, such as withdrawal of consent or when the data is no longer necessary for the purpose for which it was collected or processed
  - Withdraw your consent in situations where our collection and use of your personal information is based solely on your consent
- Data subjects may exercise these rights by contacting BroadReach Group’s Data Protection Officer at [dataprotection@brhc.com](mailto:dataprotection@brhc.com). BroadReach will notify the data subject of action taken on the request within 30 days after receipt (or within 90 days where an extension is warranted by the complexity and volume of requests).
- You may also lodge a complaint with the relevant supervisory authority for your country.

### Changes to This Privacy Notice

- We may update this Privacy Notice from time to time to reflect changes in our practices or applicable law. When we make these updates, we will change the “Effective Date” above. If there are any material changes in this Privacy Notice, we will post a notice on this website. We encourage you to periodically review this page to make sure you have the most current information on our privacy practices.