

Annexure B

A: Purpose of processing:

The purposes for which CMS South Africa processes personal information includes but is not limited to:

- (a) rendering of services to our clients;
- (b) employee administration;
- (c) transacting with our suppliers and third-party service providers;
- (d) maintaining records;
- (e) recruitment;
- (f) general administration;
- (g) financial requirements;
- (h) compliance with legal and regulatory requirements; and
- (i) facilities management.

B: Categories of data subjects and associated personal information

Data Subject	Personal Information processed
Employees	ID number, contact details, physical and postal address, date of birth, age, marital status, race, employment history, criminal/background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension/ provident fund information), details related to employee performance, disciplinary procedures, employee disability information, employee pension and provident fund information, employee contracts, employee performance records, payroll records, electronic access records, physical access records, CCTV records, health and safety records, training records, employment history, time and attendance records
Clients	<i>Natural persons:</i> ID number, information required for FICA compliance, contact details, physical and postal address <i>Legal persons:</i> Entity name, registration number, VAT number, contact details for representative persons, FICA documentation

Suppliers and service providers	Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, B-BBEE certificates, invoices, agreements
Directors and shareholders	Name, surname, ID numbers, other information as required for reporting purposes
Website visitors	Name, email address, company name, job title and telephone number
Visitors	Physical access records, electronic access records and CCTV records

C: Sharing of personal information

CMS South Africa may share personal information with:

- (a) other companies forming part of CMS South Africa’ group of companies located outside of South Africa and/or CMS EEIG (and/or any of its member firms);
- (b) service providers who perform services on behalf of CMS South Africa; and
- (c) third-party suppliers.

D: Cross border transfers of personal information

CMS South Africa may from time to time need to transfer personal information to its group companies, service providers, other third parties and/or CMS EEIG (and/or any of its member firms) located in a country outside of South Africa, including for the purposes of rendering services to clients or for CMS South Africa administration purposes (including employee administration).

Where personal information is transferred outside of South Africa, CMS South Africa will take steps to ensure that such transfer is subject to laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPI.

E: Information Security Measures

CMS South Africa implements and maintains reasonable technical and organisational measures to protect personal information, including by way of the implementation of policies, procedures and controls aimed at preventing any unauthorised access to, loss or destruction of personal information.

CMS South Africa has a wide range of security measures designed to mitigate data security breaches, accidental loss or destruction of, or damage to, personal information.

CMS South Africa has and will continue to take steps to ensure that third party providers who process personal information on behalf of CMS South Africa apply appropriate safeguards in compliance with POPI.