

PRIVACY NOTICE TO MHR PANEL MEMBERS

This notice applies to all MHR panel members. This notice does not form part of any contract of employment or another contract to provide a service. It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you. This will ensure that you are aware of how and why we are using such information and what your rights are under applicable data protection laws.

Unless otherwise stated, all personal information we request from you is obligatory. If you do not provide and/or allow us to process all obligatory personal information, as requested, we will not be able to keep complete information about you, thus affecting our ability to accomplish the purposes set out below.

1. PERSONAL INFORMATION WE POTENTIALLY HOLD ABOUT YOU

Depending on our relationship with yourself, we might hold different categories of personal information, as per the table set out below:

The term “ personal information ” in this notice refers to information that does or is capable of identifying you as an individual.		
<p>Personal information</p> <p>Personal information is information that enables us to uniquely identify you, such as your full names, address, identification number, next of kin, memberships to societies, etc.</p>	<p>Sensitive personal information</p> <p>Sensitive personal information refers to information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, physical or mental health.</p>	<p>Information about criminal convictions</p> <p>During the course of the recruitment process, an internal investigation or as may be notified by a panel member to us, MHR may obtain information about your criminal convictions, if any.</p>

2. HOW WE COLLECT YOUR PERSONAL INFORMATION

Much of the personal information we process is information that we have obtained from yourself or authorised by you to collect from a third party upon registering as a panel member, during on-boarding and during the course of your employment. However, in other instances, we process personal information that we are able to infer about you based on other information you provide to us or during our interactions with you, or personal information about you that we receive from a third party using a process mentioned below.

Sensitive personal information about yourself, as defined above, may be collected and processed without consent, provided that it may only be processed in the jurisdiction where employed to the extent permitted by applicable law or otherwise with the express consent of the panel member.

Information about criminal convictions will be deleted once it has been verified, with a record only of whether the result of the criminal record check was satisfactory or unsatisfactory. In exceptional circumstances, the information can be kept on file where it is clearly relevant to your relationship with us.

Your corporate internet usage and communications may be monitored in accordance with applicable laws and MHR policies in this regard. Similarly, some of our premises may be monitored using closed-circuit television cameras, which might record your on-premise conduct, subject to applicable laws.

3. PURPOSE FOR WHICH PERSONAL INFORMATION IS COLLECTED AND USED

We will use your personal information, depending on the applicable laws in the country where you work, based on the following lawful reasons to process:

Lawful reason to process	Description	Data Elements (not an exhaustive list)
Based on specific consent you have provided us	<p>Evaluate applications for employment</p> <p>Communicate with you based on your candidate / application profile</p>	<p>Name, gender, telephone number, date of birth</p> <p>Ethnicity</p> <p>Residency and work permit status, nationality and passport information (including copies thereof)</p> <p>Professional certifications and registrations, confirmation of qualifications, language capabilities, and training courses attended</p> <p>Disability status and special needs</p> <p>Salary expectations</p> <p>Where permitted by law and proportionate in view of the function to be carried out by a panel member or prospective panel member, the results of credit and criminal background checks, health certifications, drivers licence, and driving history.</p>
Based on your employment contract	<p>Manage all aspects of your employment relationship, including, but not limited to, payroll, benefits, corporate travel and other reimbursable expenses, development and training, performance appraisal, disciplinary and grievance processes and other general administrative and human resource-related processes.</p> <p>Maintain sickness records and absence monitoring</p> <p>Administer termination of employment and provide and maintain references</p> <p>Communicate Human Resources and work-related information via your cell phone</p>	<p>Name, gender, home address and telephone number, date of birth, photograph, biometric information, marital status, emergency contact details</p> <p>Tax number, banking details</p> <p>Sick pay and other benefits information</p> <p>Date of registration, work history, technical skills, and educational background</p> <p>Height, weight and clothing sizes where required, i.e. for uniforms</p> <p>Date of resignation or termination, the reason for resignation or termination, information relating to administering termination of employment (e.g. post-resignation references)</p> <p>Records of work absences and requests, salary history, performance appraisals, letters of appreciation and commendation, disciplinary and grievance procedures</p> <p>Where permitted by law and proportionate in view of the function to be carried out by a panel member or prospective panel member, the results of credit and criminal background checks, the results of drug and alcohol testing, screening, health certifications, drivers licence number, vehicle registration and driving history.</p>
We need to comply with a legal obligation	<p>Comply with applicable laws (e.g. labour legislation, tax and health and safety), including judicial or administrative orders regarding yourself (e.g. garnishee orders or child support payments)</p> <p>Protect the safety and security of MHR, panel members, clients, their patients and visitors and their property (including controlling and facilitating access to and monitoring activity in secured premises and activity using MHR and/or client's computers,</p>	<p>Information required to comply with laws, the requests and directions of law enforcement authorities or court orders Tax number, social security number</p> <p>Acknowledgements regarding MHR policies, including ethics and/or conflicts of interest policies and computer and other corporate resource usage policies</p> <p>Details of any actual or potential conflict of interests.</p> <p>Shareholding, whether direct or indirect beneficial as required by listing requirements</p> <p>Voicemails, emails, correspondence and other work product and communications created, stored or transmitted by a panel member using MHR and/or MHR clients' computer or communications equipment (although correspondence exchanged using MHR and/or MHR clients' equipment but using personal addresses is only processed to the extent permitted by applicable law).</p> <p>Direct and indirect shareholding and dealings in MHR securities or</p>

	communications and other resources)	any of its subsidiaries.
Although likely to be rare, we may also use your personal information where we need to protect your interests (or someone else's interests), or it is needed in the public interest.	Maintain emergency contact details (which involves MHR holding information on those you nominate in this respect). Occupational health programs	Disability status and special needs
It is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests; or as otherwise permitted by applicable laws.	Develop human resources and succession plans. Investigate and respond to claims against MHR, its panel members, MHR clients, client's patients and visitors	Conduct panel member opinion surveys and administer panel member recognition programs. Information captured on security systems, including CCTV (Southern Africa only) and key card entry systems and other security and technology systems, to the extent permitted by applicable law.

4. CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, as specified above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose for which the information was collected. If we need to use your personal information for an unrelated purpose, we will notify you, and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by applicable laws.

5. DISCLOSURE OF INFORMATION

For the purposes specified in this notice, your personal information may be shared with third parties and other appropriate persons within MHR. We require all such persons to respect the security of your personal information and treat it according to our Policy and applicable law.

Agents, service providers and suppliers

Like many businesses, from time to time, we outsource the processing of certain functions and/or information to third parties . When we outsource the processing of your personal information to third parties or provide your personal information to third-party service providers, we oblige those third parties to protect your personal information with appropriate security measures according to our Policy and to at least the same level that we do.

Business transfers

As we continue to develop our business, we may buy temporary placement agencies or sell part of our business and other assets. In such transactions, panel member information is generally one of the transferred business assets, and we may include your personal information as an asset in any such transfer. Also, in the event that we, or substantially all of our assets, are acquired, panel member information may be one of the transferred assets.

Legal requirements

We will disclose any personal information we have concerning you if we are compelled to do so by a court of law, requested to do so by a governmental entity, or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting, tax rules, regulations and any specific record retention laws, even if you are no longer registered with MHR.

International transfers

Like most international businesses, we have centralised certain aspects of our data processing and human resources administration in accordance with applicable laws in order to allow us to manage our business better more effectively. That centralisation may result in the transfer of personal information from one country to another. Whenever we do, you can expect a similar degree of protection in respect of your personal information, which will be processed according to our Policy and applicable laws, as you would expect in your country.

6. DO WE NEED YOUR CONSENT?

Generally, we do not need your consent to collect and use your personal information unless required by applicable laws, in which case we will not process your personal information without your consent.

7. DATA SECURITY

Your personal information shall be treated as confidential and collected, processed and stored by MHR and our service providers in a manner that ensures appropriate security thereof, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures, which include:

- identity and access management;
- infrastructure and operations security;
- vulnerability management;
- business continuity planning;
- disaster recovery planning; and
- security awareness.

Further details of these measures are available upon request.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. DATA RETENTION

We will retain your personal information for no longer than is necessary or permitted by applicable law. Once you are no longer a panel member with MHR, we will retain and securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

We may retain certain personal information of panel members after their contract ends for any residual aspects of the purposes set out above. We will only retain such personal information for as long as it is necessary and in all cases for no longer than permitted or required by applicable law and any MHR policy on the retention of records.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

9. YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

It is essential that the personal information we hold about you is accurate and current. Please follow the necessary steps to update your personal information should it change during your working relationship with us.

Subject to certain exceptions, you may request to access, correct, erase or restrict our processing of your personal information. We will need specific information from you to help us confirm your identity and ensure your right can be exercised. This is another appropriate security measure to ensure that personal information is not disclosed to or amended by any person who has no right to receive or amend the information.

Once a request is received, the MHR office shall provide feedback to the panel member as required by law or internal processes.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your MHR office. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10. ACCEPTANCE AND CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

11. QUESTIONS

If you have any questions about this privacy notice, our lawful reason to process or how we handle your personal information, please contact the MHR Data Protection Officer.

MHR has appointed a Data Protection Officer who is responsible for overseeing the implementation of the Policy. You are welcome to contact the Data Protection Officer at dataprivacy@MHR.co.za.