

PRIVACY POLICY

How Thrive Point Group Holdings (Pty) Ltd processes personal information — POPIA notice

1. WHO WE ARE

Thrive Point Group Holdings (Pty) Ltd ("TPGH", "we") is a pre-employment screening and verification company based in Cape Town, South Africa. This policy explains how we collect, use, share, protect and retain personal information in terms of the Protection of Personal Information Act 4 of 2013 ("POPIA"). Our Information Officer is Janise Naicker, janise@tpgh.co.za, 072 129 9784.

2. WHOSE INFORMATION WE PROCESS

We process personal information of: (a) candidates whose prospective employers ask us to verify their details; (b) referees and contact persons at previous employers and institutions; and (c) business contacts at our clients.

3. WHAT WE COLLECT

For candidates, and only with their written consent: identity details (name, ID number, contact details); educational and professional qualification details; employment history and references; criminal record check results (fingerprint-based); and, only where legally permissible for the role, credit and fraud-listing information. Criminal and financial information are special categories which we process strictly for employment-suitability assessment with consent. For clients and referees, we process business contact details.

4. WHY WE PROCESS IT

We process personal information to: verify candidate claims and compile verification reports for the prospective employer named in the candidate's consent form; communicate with candidates, clients and referees; invoice and administer our client relationships; and comply with legal obligations. Our lawful bases are the candidate's consent, the performance of our contracts, and our and our clients' legitimate interests in safe, informed hiring.

5. WHO WE SHARE IT WITH

We share personal information only with: the prospective employer named in the candidate's consent; the accredited verification providers, institutions, registries and credit bureaus needed to perform each check; our service providers under confidentiality obligations (e.g. secure IT and email hosting); and regulators or authorities where the law requires. We do not sell personal information, and we do not use it for marketing.

6. HOW WE PROTECT IT

We apply appropriate, reasonable technical and organisational safeguards, including secure password-protected systems, access limited to authorised personnel, and confidentiality undertakings from anyone who handles candidate information. If a security compromise occurs, we will notify the Information Regulator and affected data subjects as required by section 22 of POPIA.

7. HOW LONG WE KEEP IT

We retain consent forms and verification records only as long as reasonably necessary for the purpose collected, to meet legal, audit and dispute-resolution requirements, after which records are securely destroyed. Candidates may request details of our retention periods.

8. YOUR RIGHTS

Data subjects have the right to: be informed of processing; request access to their personal information; request correction or deletion of inaccurate, irrelevant or unlawfully obtained information; object to processing; withdraw consent before checks are completed; and complain to the Information Regulator (South Africa) — complaints.IR@inforegulator.org.za / www.inforegulator.org.za. To exercise any right, contact our Information Officer at janise@tpgh.co.za. We respond within a reasonable time and as required by POPIA.

9. UPDATES TO THIS POLICY

We may update this policy from time to time. The latest version is available from us on request and, once live, on our website. This version is dated [Month 2026].