RAG TALENT PRIVACY NOTICE

Last Updated: 16 November 2026

RecruitAGraduate (Pty) Ltd, trading as RAG Talent (“RAG Talent”, “we”, "us", or “our”) is committed to protecting your privacy. This Privacy Notice explains how we collect, utilise, disclose, and safeguard your personal information when you visit our website, register on our platform, communicate with us via telephone, or engage our professional recruitment, workforce strategy, and B-BBEE transformation partnership services.

We operate transparently under South African law - including the Labour Relations Act 66 of 1995, the Protection of Personal Information Act 4 of 2013 ("POPIA"), and Broad-Based Black Economic Empowerment (B-BBEE) statutory frameworks - as well as international data protection regulations, including the UK/EU General Data Protection Regulation ("GDPR") and applicable United States privacy frameworks, to support our diverse global talent placements and workforce strategies.

1. Scope and Your Consent

This Privacy Notice applies to all users of our services globally, including youth professionals, graduates, independent specialists, mid-to-senior candidates, corporate clients, transformation executives, and juristic entities.

By using our website, submitting your curriculum vitae (CV), communicating with us via telephone, or entering into a recruitment or strategic talent agreement with us, you acknowledge that you understand the terms of this Privacy Notice. Where processing relies on consent, you explicitly agree to the collection, processing, transfer, use, and disclosure of your data as outlined below.

2. Technical and Infrastructure Architecture

To ensure high-level security and performance, our web platform and business systems utilise a modern global infrastructure:

- **Hosting & CDN:** Our website is hosted via Rocket.net utilising Cloudflare Enterprise infrastructure and Content Delivery Networks (CDN). The primary origin server is strategically located in London, United Kingdom.

- **Data Processing Pipelines:** While technical metadata may flow through our web infrastructure, the vast majority of personal information submitted via our website forms does not reside on WordPress. Instead, it is securely transmitted and processed directly within Zoho core database systems.
- **Cloud Infrastructure & Internal Operations:** Our internal operations, document storage, and strategic communications are powered by Google Workspace services. Data managed within these services is secured using enterprise-grade encryption and may be processed across Google's secure global infrastructure in accordance with strict data processing agreements.
- **Telephony & Communications Infrastructure:** Our inbound and outbound business telephone communications are hosted and managed via the **3CX** communications platform. Voice communications, call metadata, and call recordings are encrypted and securely stored within our managed cloud communications environment in accordance with strict access controls and data processing agreements.
- **Cookie Governance:** We utilise the Complianz WordPress plugin to dynamically manage regional cookie consents, user privacy settings, and scripts.

3. The Personal Information We Collect

We collect information that identifies you as an individual or a business entity. Because we focus on graduate pathways, diverse leadership appointments, and business transformation, we process the following categories:

A. Information You Provide Directly

- **Identity & Contact Data:** Full names, email addresses, phone numbers, physical and postal addresses, and government-issued identification numbers (e.g., South African ID, global passport numbers).
- **Professional & Employment History:** Employment history, CVs, academic records, educational background, professional qualifications, motivational letters, references, and professional preferences.
- **Telephone & Voice Communications Data:** Audio recordings of inbound and outbound telephone calls, along with associated call metadata (such as caller and recipient phone numbers, timestamps, call duration, and routing logs), collected when you communicate with our team via telephone.
- **Transformation & Equity Metrics (Special/Sensitive Data):** To effectively support client B-BBEE goals, youth-to-leadership pathways, and access to

neurodiverse talent, we process demographic data (such as race, gender, disability, or neurodivergent status parameters) strictly where legally permitted, consented to, or mandated by local transformation and equity reporting laws.
- **Vetting & Verification Data:** Background verification parameters (such as criminal record checks or credit checks) strictly where required for specific financial, senior leadership, or high-risk placements.

B. Technical Data Collected Automatically

As you navigate our website, the origin server (London) and Cloudflare network automatically log standard technical data, which is governed via Complianz:

- Internet Protocol (IP) addresses, browser types, operating systems, and device identifiers.
- Server logs, security event logs, and website interaction metrics.
- **Cookies & Analytics:** We utilise functional cookies for core platform operations. Advanced tracking mechanisms, such as Google Analytics and Google Ads conversion tracking, are fully integrated into our Complianz consent architecture and remain inactive for any user who has not explicitly granted consent.

4. Lawful Bases and Purposes of Processing

We process personal data only when a valid legal framework applies. The primary purposes and corresponding legal bases include:

Purpose of Processing	Categories of Data Involved	Legal Basis (POPIA / GDPR / Global)
Account Creation & Graduate Pathways: Managing client mandates and candidate matching profiles for career entry points.	Contact details, CVs, academic transcripts, professional skills.	**Contractual Necessity:** To execute agreements or take pre-contractual steps at the data subject's request.
B-BBEE & Diversity Strategy Delivery: Helping businesses build diverse, future-ready workforces to meet statutory transformation targets.	Race, gender, neurodiversity status indicators, demographic metrics.	**Legitimate Interest & Legal Duty:** Complying with South African transformation frameworks and supporting

		client corporate equity strategies.
Background Screening & Vetting: Performing verifications via enlisting specialized agencies to secure talent placement integrity.	Educational verification, credit checks, criminal history, references.	**Legitimate Interest / Legal Duty:** Ensuring workforce security and meeting statutory hiring standards.
Telephone Communications & Call Recording: Recording inbound and outbound calls for staff training, quality assurance, dispute resolution, and accurate record-keeping of client and candidate instructions.	Audio voice recordings, phone numbers, call timestamps, and call logs.	**Legitimate Interest:** Ensuring service quality, maintaining accurate business records, training personnel, and protecting both parties against legal or contractual disputes.
Platform Optimisation & Defence: Monitoring technical traffic to detect fraud, security threats, and maintain uptime.	IP addresses, server logs, network telemetry.	**Legitimate Interest:** Keeping our digital ecosystem secure and functional.
Marketing & Talent Alerts: Sending tailored job updates, graduate entry alerts, and newsletters.	Names, email addresses, regional preferences.	**Consent / Legitimate Interest:** Tailored opt-in for new users, or opt-out rights for established clients.

5. International Data Transfers

RAG Talent is a South African entity serving an expanding global network of candidates and clients. Because our website origin server is based in London (UK) and our internal infrastructure utilises Google cloud systems, data flows across borders routinely.

When personal data is transferred out of South Africa, the EEA, or the UK, we guarantee that appropriate cross-border mechanisms are enforced:

- We maintain structured Data Processing Agreements (DPAs) with our critical infrastructure partners, including Rocket.net, Google, Zoho, and 3CX.
- Transfers between South Africa, the UK, the European Economic Area (EEA), and other international jurisdictions are protected by Standard Contractual Clauses (SCCs), binding corporate policies, or specific statutory adequacy protections to maintain data integrity.

6. Data Sharing and Disclosures

We do not sell your personal data to third parties for commercial gain. We disclose information only as follows:

- **To Corporate Clients & Strategic Partners:** Sharing candidate profiles, qualification summaries, transformation metrics, and CVs with prospective employers to facilitate diverse talent onboarding.
- **To Subprocessors & Service Providers:** Trusted cloud software and communications providers (such as Zoho, Google, and 3CX) and web infrastructure controllers (Rocket.net) operating under strict data security constraints.
- **To Verification and Vetting Agencies:** We share relevant identification, educational, and professional background details with authorised local vetting and background-screening agencies. This processing is strictly limited to verifying the accuracy of candidate profiles, executed under strict confidentiality terms.
- **Regulatory & Lawful Mandates:** To the South African Department of Labour, revenue services (SARS, HMRC, etc.), or courts of law where we are legally compelled to comply with public authorities.

7. Regional Data Subject Rights

A. South Africa (POPIA & PAIA)

If you are a South African resident, you have rights under POPIA and the Promotion of Access to Information Act (PAIA) to:

- Confirm if we hold your personal information and request a description of that data.
- Object to processing or object to direct marketing at any time.
- Request the correction, destruction, or deletion of incomplete, inaccurate, or excessive data.
- Lodge a complaint with the Information Regulator of South Africa (inforegulator.org.za).

B. United Kingdom & European Economic Area (GDPR)

If you reside within the UK or the EEA, you possess the following explicit rights:

- **Access, Rectification, or Erasure:** Request copies of your data, correct defects, or demand erasure ("right to be forgotten").
- **Restriction & Objection:** Restrict how we process your information or object to specific processing tracks.
- **Data Portability:** Request that your structured data be transferred directly to another provider.
- **Withdraw Consent:** Revoke your consent at any time without undermining the legality of historical processing.

You have the right to lodge a complaint with your local Supervisory Authority (e.g., the UK Information Commissioner's Office (ICO) or EEA data protection bodies).

C. United States Privacy Rights

Residents of various US states (including California under the CCPA/CPRA) have rights to know, correct, delete, or limit the use of their sensitive personal information. We do not engage in the automated sale of personal information. Requests can be logged through our primary channels.

8. Data Security and Retention

We deploy robust physical, technical, and administrative controls (including encryption in transit, strict firewalls via Cloudflare Enterprise, and strict access controls) to guard your data.

We retain personal information only for as long as necessary to fulfil recruitment and workforce onboarding terms, maintain accurate financial records, or satisfy local statute-of-limitations periods. Telephone call recordings are retained only for a strictly limited period necessary to fulfil quality assurance, training, or dispute-resolution objectives, after which they are securely deleted unless required for an ongoing legal or compliance matter.

9. Amendments to this Notice

We may periodically update this Privacy Notice to reflect operational adjustments or changing international data laws. The "Last Updated" date at the top of this document will reveal when changes were last implemented.

10. Contact Us

If you wish to exercise your legal rights under POPIA, GDPR, or other global frameworks, or if you have questions regarding our data practices, please contact our data compliance coordinator:

- **Email:** info@rag-talent.co.za
- **Phone:** (+27) 10 880 7583
- **Web Form:** Contact Us