

Privacy Policy: Data Protection, POPIA and Use of Information

Our Website: www.survgroup.com

Last updated: June 2026

Whereas Survgroup (Pty) Ltd t/a SURV (“the Company”) respects the privacy of all personal data and private information collected, processed, and stored. As such, we undertake to handle all personal information received and processed with due care and provide the necessary security to safeguard all information held by us. Our internal system similarly allows us to proactively react should there be a breach of any kind; alternatively, our privacy practices and POPIA policy dictate that we report any material breach to the Regulator. By using our website, you agree to the following. Please do not use our website or online products and services if you do not agree with this privacy policy.

Interpretation and Definitions

The words that are capitalized or have their initial letter capitalized will have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural. Any reference to gender will be in respect of all genders and shall not be exclusive unless mentioned in a strict and specific context.

Definitions

For the purpose of this Privacy Policy:

- **Account** means a unique account or profile created for you on the Company’s internal system, in which the Company’s services can be accessed and your personal information will be stored and/or processed;
- **Company** (hereinafter referred to as either “the Company”, “We”, “Us”, or “Our” in this Agreement) means Survgroup (Pty) Ltd, a company duly registered in terms of the Companies Act 71 of 2008, with its registered place of business at 14 Skeerkwas, Proteavalley, Cape Town, 7536. The Company operates across three service divisions: SURV SA – Staffing and Recruitment; SURV SA – Mystery Shopping; and SURV UAE – Mystery Shopping (operating in the United Arab Emirates). Each division may operate under a distinct trading name and entity structure but is subject to this Privacy Policy where applicable;
- **Cookies** means small files that are placed on your computer, mobile device or similar device, containing the details of your browsing history on a specific website and can be used for analytics — also referred to as technical personal information;
- **Country** means the Republic of South Africa (and, where applicable in the context of SURV UAE – Mystery Shopping, the United Arab Emirates);
- **Device** means any device that can access the Company’s website such as a computer, a cellphone or a digital tablet;
- **Mystery Shopping Services** refers to the Company’s mystery shopping and service evaluation programmes, in which contracted Mystery Shoppers conduct anonymous visits or assessments of client venues (including hotels, restaurants, game lodges, wine estates, safari camps, and event venues) and submit structured reports to the Company for onward delivery to clients;

- **Mystery Shopper** means an individual contracted by the Company to conduct anonymous assessments or evaluations of client premises and services, and who submits reports and personal information to the Company in connection with such engagements;
- **Personal Information** or **Personal Data** means any information that can be used to reveal a person's identity. Personal Information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including but not limited to information concerning:
 - Race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of person;
 - Information relating to the education or the medical, financial, criminal or employment history of the person;
 - Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - Biometric information of the person;
- **Service Provider** or **Operator** means any natural or juristic person who processes the data on behalf of the Company. It refers to third-party companies or individuals contracted to the Company to facilitate or administer the Company's website, to provide support on the Company's website and to assist the Company with analysing how the website is used and/or the Personal Information collected by the Company's website;
- **Staffing and Recruitment Services** refers to the Company's on-demand hospitality staffing marketplace and permanent/temporary recruitment services, through which hospitality professionals (contractors and employees) are matched with employer clients across the African continent;
- **Usage Data** refers to data collected automatically, either generated by the website or from the website's infrastructure (i.e. the duration of a page visit or the amount of traffic on the website);
- **You** means the individual accessing or using the Company's website, or the company or any other legal entity on behalf of which such individual is accessing or using the website, as applicable;
- **Website / Software** refers to the Company's website, website application(s) and/or software application(s) used by the Company to offer its services — including Mystery Shopping Services and Staffing and Recruitment Services — and/or to allow clients, prospective contractors, Mystery Shoppers, and prospective employees to connect with the Company and engage with its services.

Collecting and Using Your Personal Information

Types of Data Collected

Personal Data

While using Our Website, we may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information collected via Our website may include, but is not limited to:

- Email address;

- First name and last name;
- Physical or postal address;
- Identity number or passport number (where required for contractor or Mystery Shopper onboarding);
- Banking and payment details (for contractor and Mystery Shopper remuneration purposes only);
- Any information provided to the Company or via the website, website application or any applicable software in order to register for any of the Services, including registering as a hospitality contractor, a Mystery Shopper, an employer client, or a mystery shopping client; and
- Usage Data.

Information Collected in Connection with Mystery Shopping Services

In connection with the Company's Mystery Shopping Services, the Company may collect and process the following additional categories of information:

- Mystery Shopper profile information, including identity documentation, contact details, vehicle information, and demographic details required to match Mystery Shoppers to suitable assignments;
- Assignment reports, evaluations, photographs, and feedback submitted by Mystery Shoppers following a completed assessment;
- Client venue information, including the name, location, and operating details of venues subject to mystery shopping evaluations;
- Confidential assessment data and scoring information generated during the course of a mystery shopping assignment, which is treated as commercially sensitive and subject to strict confidentiality obligations.

Confidentiality of Mystery Shopping Assignments: The identity of Mystery Shoppers and the existence of any mystery shopping programme are treated as strictly confidential. Mystery Shopper identities will not be disclosed to client venues or third parties, except where required by law or expressly consented to by the Mystery Shopper.

Information Collected in Connection with Staffing and Recruitment Services

In connection with the Company's Staffing and Recruitment Services, the Company may collect and process the following additional categories of information:

- Contractor and candidate profiles, including employment history, qualifications, skills, references, and availability;
- Identity documentation and right-to-work verification information;
- Banking and payment details for the remuneration of contracted staff;
- Shift records, timesheets, and related employment data.

Information Received via the Website, Website Application and/or Any Applicable Software

All information collected, processed and stored via the website or website application will be subject to the Company's terms and conditions, as well as any applicable data protection policy and/or legislation. The information provided will be used and analysed by the Company in an effort to:

- Match prospective hospitality contractors and candidates with prospective employer clients through the Company's Staffing and Recruitment Services;
- Allocate suitable Mystery Shoppers to appropriate mystery shopping assignments through the Company's Mystery Shopping Services;
- Deliver mystery shopping assessment reports to relevant clients; and
- Communicate service-related information to clients, contractors, Mystery Shoppers, and other registered users.

Such use may include, but is not limited to, push content, direct notifications, and making use of an applicable algorithm to ensure that the best and most suitable results are achieved.

Usage Data

Usage Data is collected automatically when using the Company's website. Usage Data may include information such as Your Device's Internet Protocol address ("IP Address"), browser type, browser version, the pages of Our website that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access Our website by or through a mobile device, We may collect certain information automatically, including but not limited to the type of mobile device You use/own, Your mobile device unique ID, the IP Address of Your mobile device, and other diagnostic data.

Tracking Technologies and Cookies

Tracking technologies used include, but are not limited to, beacons, tags, and scripts to collect and track information and to improve and analyse Our website.

Cookies:

The Company uses cookies, pixels, and other technologies (collectively referred to as "**cookies**") to recognise Your browser or device, learn more about Your company or industry, and provide You with essential features and services, as well as for additional purposes, including:

1. Recognising You when you sign up to use Our services. This allows Us to provide each user or data subject with customised features and services, if applicable.
2. Conducting research and diagnostics to improve the Company's website content, products, and services.
3. Preventing fraudulent activity.
4. Improving security.
5. Delivering content, including ads, relevant to Your interests.
6. Reporting. This allows Us to measure and analyse the performance of Our services and/or Our website.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser. We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies:** Session Cookies administered by Us for the purpose of providing You with services available through Our website and to enable

You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts.

- **Cookies Policy / Notice Acceptance Cookies:** Persistent Cookies administered by Us for the purpose of identifying whether users have accepted the use of Cookies on the website.
- **Functionality Cookies:** Persistent Cookies administered by Us for the purpose of allowing Us to remember choices made by You on Our website, such as remembering Your login details or language preference, and to provide You with a more personalised experience.

You can manage browser cookies through your browser settings. The “Help” feature on most browsers will tell you how to prevent your browser from accepting new cookies; how to have the browser notify you when you receive a new cookie; how to disable cookies; and when cookies will expire. If you disable all cookies on your browser, the Company, nor any of its third parties, will transfer cookies to your browser. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some features and services may not work.

The Company makes use of Google Analytics to administer, consider and analyse activity on Our website. Google's privacy policy can be accessed via <https://policies.google.com/privacy/embedded?hl=en-US>.

You may opt out of Google Analytics by following these directions: <https://support.google.com/analytics/answer/181881>.

Website Privacy and Use of Personal Information

7. Personal Information is collected only when knowingly and voluntarily submitted via the website, website application or any applicable software.
8. Personal Information is only used for the purpose for which it was collected and/or submitted or such secondary purposes that are related to the primary purpose.
9. In addition to where You have consented to the disclosure of Your personal information, Personal Information may be disclosed in special situations where the Company has reason to believe that doing so is necessary to identify or act against anyone damaging or interfering with Our rights, property, users and/or anyone else that could be harmed by such activities.
10. The Company may engage third parties to provide You with goods or services on Our behalf and in such circumstances may disclose Your Personal Information to such parties in order to provide such goods and services, strictly in terms of The Protection of Personal Information Act 4 of 2013 (“POPIA”) and the following provisions:
 - i. **With Service Providers:** We may share Your Personal Information with Service Providers to monitor and analyse the use of Our website and/or to contact You;
 - ii. **For business transfers:** We may share or transfer Your Personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company;
 - iii. **With Affiliates:** We may share Your Personal Information with Our affiliates, including other entities within the SURV group of companies; in which case We will require those affiliates to honour this Privacy Policy;

- iv. **With Clients:** In the context of Mystery Shopping Services, aggregated and anonymised assessment reports may be shared with relevant clients. Mystery Shopper identities will not be disclosed to clients without the express consent of the Mystery Shopper;
- v. **With Your consent:** We may disclose Your Personal Information for any other purpose with Your express consent.

Retention of Your Personal Information

The Company will retain Your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Information to the extent necessary to comply with Our legal obligations, resolve disputes, and enforce Our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our website.

Mystery shopping assessment reports and related data will be retained for the period required by the applicable client agreement, and thereafter for such further period as may be required by law or legitimate business interest.

Cross-Border Data Transfers

The Company operates across South Africa and the United Arab Emirates. Where Personal Information is transferred between jurisdictions in connection with the Company's services (including SURV UAE – Mystery Shopping operations), the Company will take appropriate steps to ensure that such transfers are conducted in compliance with applicable data protection laws, including POPIA and relevant UAE data protection legislation.

By providing Your Personal Information to the Company, You acknowledge that Your information may be transferred to and processed in jurisdictions outside of South Africa where the Company operates.

Information Security on Our Website

- 11. Any information that you upload on our website will be stored on a secure server and be used for limited purposes such as future communications (which you are always entitled to unsubscribe to).
- 12. The Company will not disclose, sell, rent, or disseminate your personal information to third parties without your consent unless the Company is compelled to do so by law.
- 13. While all reasonable efforts are taken to ensure that your personal information is protected as it travels over the internet, the Company cannot guarantee the absolute security of any information you exchange with us due to reasons beyond our control.
- 14. Mystery Shopper identities and assignment details are treated as strictly confidential and are subject to additional internal security controls to prevent unauthorised disclosure.

Financial Information

15. We do not have access to your financial information beyond what is expressly provided by you.
16. Banking and payment details collected in connection with contractor remuneration or Mystery Shopper payments will be treated as highly confidential and processed solely for payment purposes, strictly in terms of POPIA and any applicable financial regulations.
17. All personal information relating to financial information shall always be accompanied by the necessary consent or legal provisions.

Children's Personal Information

18. The Company's website and services are not directed at children under the age of 18. We do not knowingly collect Personal Information from minors.
19. Any information pertaining to children must be given with the prior consent of the parent or legal guardian; given voluntarily; and will only be stored or processed within the strict scope and/or mandate for which it was collected or provided.
20. All material efforts will be taken by the Company to ensure that no children's personal information is unlawfully and irresponsibly collected, stored or processed and is done strictly in terms of the Protection of Personal Information Act 4 of 2013 ("POPIA").
21. We consider all personal information pertaining to children as highly sensitive and will never misuse, abuse, unlawfully process or share any such information with any third party prior to obtaining the necessary consent and/or unless required to do so by law.

Your Data Protection Rights

Right to Access and Rectify Your Information

22. You may request that the Company remove and/or delete any of Your Personal Information held by the Company or one of Our Service Providers.
23. You have the right to request that the Company correct any information You believe is incorrect or inaccurate. You also have the right to request the Company to complete information You believe is incomplete.

Right to Object

24. You have the right to object to Our processing of your personal information in terms of s11(3) of POPIA, as well as the right to request that the Company be restricted from processing Your Personal Information except under certain circumstances.
25. You may object by sending an email to our offices with the subject line: "POPIA AND DATA PROTECTION" sent to the following email address: info@survgroup.com

Right to Complain

You have the right to lodge a complaint with the Information Regulator (or directly to us at info@survgroup.com):

Complaints to the Regulator: complaints.IR@justice.gov.za

Changes

From time to time it may become necessary to make changes to this privacy policy to reflect changes in the Company's business, services, or applicable legislation. It is your responsibility to periodically check our website for any updates. Material changes will be communicated via the website where practicable.

Our Information and Contact Details

Name of Company: Survgroup (Pty) Ltd t/a SURV

Information Officer: Rochelle Ann Rolfe

Email address: info@survgroup.com

Physical address: 14 Skeerkwas, Proteavalley, Cape Town, 7536