



POINTERS CAREER GUIDANCE

Privacy Policy for Pointer Career Guidance

Effective Date: 14 November 2025

1. Introduction and Scope

This Privacy Policy sets out how Pointer Career Guidance NPC. (referred to as "we," "us," or "our") collects, uses, discloses, and protects your Personal Information. We are committed to complying with the Protection of Personal Information Act, No. 4 of 2013 (POPIA), which is the primary data protection law in South Africa.

As the Responsible Party, we determine the purpose and means of processing your Personal Information. This policy applies to all Personal Information processed by Pointer Career Guidance, including through our website, services, and any other interactions you may have with us.

2. The Personal Information We Collect

We collect various categories of Personal Information necessary to provide our career guidance services. This information is collected directly from you, from third parties with your consent, or automatically as you use our services.

Category of Information	Examples of Data Collected	Purpose of Collection
Identity Data	Name, surname, date of birth, gender, ID number (if required for formal assessments).	To uniquely identify you and personalise our guidance services.
Contact Data	Email address, telephone number, physical address.	To communicate with you regarding your services and account management.

Category of Information	Examples of Data Collected	Purpose of Collection
Career/Educational Data	Educational history, qualifications, work experience, career aspirations, psychometric assessment results, CVs.	Core purpose of providing comprehensive career guidance, matching you with suitable paths, and preparing you for the job market.
Usage Data	IP address, browser type, pages viewed, access times.	To monitor and improve the performance and security of our website and services.
Financial Data	Payment details (excluding full payment card details, which are processed by secure third-party payment gateways).	To process payments for services rendered.

3. How We Collect and Process Your Information

We collect your Personal Information through the following means:

- **Directly from you (Data Subject):** This occurs when you register for a service, complete an indemnity form, submit your CV, participate in an assessment, or communicate with us via email, phone, or in person.
- **Indirectly:** We may collect information from third-party sources, such as educational institutions or previous employers, but only with your explicit consent. We may also use publicly available sources to verify information.
- **Automatically:** We may use cookies and similar tracking technologies on our website to collect Usage Data. Please refer to Section 11 for more details on our Cookies Policy.

Our processing of your Personal Information is based on one or more of the following legal justifications under POPIA:

- 1 **Consent:** Where required, we will obtain your explicit, voluntary, and informed consent before processing your Personal Information, particularly for marketing or sharing data with third parties like potential employers.
- 2 **Contract:** The processing is necessary for the performance of a contract with you, such as providing the career guidance services you have requested.
- 3 **Legitimate Interest:** The processing is necessary for our legitimate business interests (e.g., improving service quality, security, fraud prevention), provided your interests and fundamental rights do not override those interests.
- 4 **Legal Obligation:** The processing is necessary to comply with a legal or regulatory obligation, such as tax or financial reporting requirements.

4. Disclosure of Personal Information

We will not sell, rent, or trade your Personal Information. We may, however, disclose your Personal Information to the following categories of recipients:

- **Service Providers:** We engage third-party service providers to assist us in operating our business, such as IT support, cloud hosting, payment processors, and psychometric assessment providers. These parties are contractually bound to keep your information confidential and secure, and to comply with POPIA.
- **Potential Employers or Institutions:** As part of the career guidance process, we may share your Personal Information (e.g., your CV and profile) with potential employers or educational institutions, but only with your prior, explicit consent.
- **Legal and Regulatory Bodies:** We will disclose your Personal Information when required to do so by law, court order, or to protect our rights, property, or safety, or the rights, property, or safety of others.

5. Cross-Border Transfer of Information

In the event that we need to transfer your Personal Information outside of the Republic of South Africa, we will ensure that the transfer is done in accordance with the conditions set out in POPIA. This means we will only transfer the information if:

- The recipient is subject to a law, binding corporate rules, or a binding agreement that provides an adequate level of protection substantially similar to POPIA.
- You have consented to the transfer.
- The transfer is necessary for the performance of a contract with you.

6. Security and Data Protection

We are committed to protecting the integrity and confidentiality of your Personal Information. We implement and continuously review appropriate technical and organisational measures to prevent loss, misuse, unauthorised access, disclosure, alteration, and destruction of your data.

Our security measures include, but are not limited to:

- Data encryption both in transit and at rest.
- Strict access controls and authentication protocols.
- Regular staff training on data protection and POPIA compliance.
- Use of firewalls and intrusion detection systems.
- Secure physical storage of any hard-copy records.

7. Data Subject Rights (Your POPIA Rights)

As a Data Subject under POPIA, you have the right to:

Right	Description
Right to Access	Request confirmation as to whether we hold Personal Information about you, and to request a copy of that information.
Right to Correction	Request the correction or updating of any inaccurate, incomplete, or outdated Personal Information we hold about you.
Right to Deletion	Request the destruction or deletion of your Personal Information, subject to any legal retention requirements we may have.
Right to Object	Object to the processing of your Personal Information, particularly for direct marketing purposes.
Right to Withdraw Consent	Withdraw your consent at any time, where the processing is based on consent. Note that this will not affect the lawfulness of processing before the withdrawal.

To exercise any of these rights, please contact our Information Officer using the details provided in Section 10.

8. Retention of Information

We will retain your Personal Information only for as long as is necessary to fulfil the purposes for which it was collected, or as required by law (e.g., for tax or regulatory purposes). Once the retention period expires, we will securely destroy or de-identify your Personal Information.

9. Changes to this Policy

We reserve the right to update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The latest version will always be posted on our website, and the "Effective Date" at the top of the policy will be updated. We encourage you to review this policy periodically.

10. Contact Details and Complaints

If you have any questions about this Privacy Policy, our processing of your Personal Information, or if you wish to exercise any of your rights, please contact our Information Officer:

Information Officer for Pointer Career Guidance:

- Name: Skhumbuzo Goge/Laura Goge
- Address: 117 Hampton Rd Midrand, 1685
- Email: skhumbuzog@pointers.org.za/laurag@pointers.org.za
- Telephone: +27 79 301 7916

The Information Regulator

You also have the right to lodge a complaint with the Information Regulator (South Africa) if you believe we have infringed your rights under POPIA.

Contact Details of the Information Regulator:

- Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Email: complaints.IR@justice.gov.za
- Website: <https://inforegulator.org.za/>

11. Cookies Policy

Our website uses cookies and similar technologies to enhance your user experience, analyse site usage, and for marketing purposes. Cookies are small text files placed on your device.

By using our website, you consent to the use of cookies in accordance with this policy. You can manage your cookie preferences through your browser settings. For a more detailed explanation of the types of cookies we use and how to manage them, you may contact Pointers Career Guidance at info@pointers.org.za.