



THE GIFTED CONSULTANTS

POPIA Processing Notice

Protection of Personal Information Act 4 of 2013 — Section 18 Compliance Notice

Effective Date: June 2026 | Version 1.0

Purpose of This Notice This notice is issued in terms of Section 18 of the Protection of Personal Information Act 4 of 2013 (POPIA). It informs you of the personal information The Gifted Consultants (Pty) Ltd collects from you, why it is collected, and your rights as a data subject under South African law. It is displayed at the point of data collection on our website and application forms.

1. Responsible Party

The responsible party for the processing of your personal information is:

Entity	The Gifted Consultants (Pty) Ltd
Registration No.	2015 / 149497 / 07
Address	Pharos House, 70 Buckingham Terrace, Westville, KwaZulu-Natal, 3629
Email	info@thegiftedconsultants.com
Telephone	+27 87 265 6714
Website	www.thegiftedconsultants.com
Information Officer	Sinikiwe Zondi, Director
PEA Registration	Registered with the Department of Employment and Labour
APSO Membership	Member of the Association of Personnel Service Organisations (APSO)

In connection with our international recruitment services, The Gifted Consultants acts as an authorised sourcing partner and data processor on behalf of UAB Hire Abroad (www.hireabroad.com), a recruitment platform registered in Lithuania and regulated under EU GDPR. For EU/EEA candidates, pre-screening data is processed by TGC on Hire Abroad's behalf under a formal Data Processing Agreement.



2. Personal Information We Collect

We collect only the personal information necessary for the specific purposes described in Section 3. Depending on which of our services you engage with, we may collect the following:

2.1 EU/EEA Candidate Pre-Screening (Tally Eligibility Form)

Category	Examples	Why Collected	Legal Basis
Identity & Contact	Full name, email address, WhatsApp/mobile number	To identify and communicate with you about your application	Consent / Legitimate interest
Nationality & Eligibility	Country of citizenship, country of residence	To assess EU/EEA eligibility for European vacancies	Consent / Contractual necessity
Employment Data	Work experience, job preferences, English level	To match you to suitable vacancies	Consent / Contractual necessity
Technical Data	IP address, browser type, pages visited	Website analytics and security	Legitimate interest

Important: TGC does not collect CVs, passports, identity documents, bank details, or criminal records at the pre-screening stage. Those documents are collected directly and securely by Hire Abroad on their platform.

2.2 Employer & Business Enquiries (Contact Form / Email)

Category	Examples	Why Collected	Legal Basis
Identity & Contact	Name, company name, email, phone number	To respond to your business or service enquiry	Legitimate interest / Consent
Business Information	Company size, hiring needs, country/location	To assess service fit and prepare relevant proposals	Legitimate interest

2.3 South African Domestic Recruitment

Category	Examples	Why Collected	Legal Basis
Identity & Contact	Name, email address, phone number	To contact you regarding local job opportunities	Consent
Professional Info	CV, qualifications, work history, references	To assess suitability for South African vacancies	Consent / Contractual necessity

3. Purpose of Processing



We process personal information only for the following lawful purposes as defined in POPIA Section 13:

- Assessing candidate eligibility for international or domestic job placements
- Matching candidates to suitable vacancies on behalf of Hire Abroad or domestic employers
- Communicating with candidates and employers about applications and opportunities
- Referring eligible EU/EEA candidates to the Hire Abroad platform for registration and placement
- Responding to employer and business enquiries regarding our recruitment and EOR services
- Complying with legal obligations including POPIA, PEA registration requirements, and the APSO Code of Ethics
- Maintaining website security and improving functionality through anonymised analytics

We do not process personal information for automated decision-making, profiling, direct marketing, or any purpose not listed above without your explicit consent.

4. Sharing of Personal Information

Your personal information is only shared in the following circumstances:

4.1 With UAB Hire Abroad — International Recruitment

Eligible EU/EEA candidates who consent to referral will have their pre-screening information passed to UAB Hire Abroad (Lithuania) for the purpose of matching and placement. This transfer is governed by a Data Processing Agreement and Standard Contractual Clauses under GDPR Article 46.

4.2 With Domestic Employers — South African Recruitment

Shortlisted South African candidates will have their information shared with prospective employers only with their prior consent and only for the specific vacancy for which they are being considered.

4.3 With Service Providers

- Tally.so — eligibility questionnaire hosting (Belgium, EU)
- Google Workspace (Google LLC) — email and document management (USA)
- Calendly LLC — interview scheduling (USA)

Assurance: *We do not sell, rent, trade, or share your personal information with any third party for commercial, marketing, or advertising purposes under any circumstances.*

4.4 Legal Disclosure

We may disclose personal information where required by law, court order, or lawful instruction from a competent authority including the South African Information Regulator.

5. Cross-Border Transfers



As an international recruitment company, some personal information is transferred across borders:

- Pre-screening data collected via our Tally form is processed in South Africa by TGC. For EU/EEA candidates, this involves a transfer from the EU to South Africa, governed by Standard Contractual Clauses under our Data Processing Agreement with Hire Abroad.
- Eligible candidates referred to Hire Abroad have their data transferred to Lithuania (EU). This transfer is made only with your explicit prior consent.
- South African candidate data for domestic placements is processed and retained within South Africa.

All cross-border transfers are subject to appropriate safeguards as required by POPIA Section 72 and applicable international data protection frameworks.

6. Retention of Personal Information

We retain personal information only for as long as necessary for the purpose for which it was collected:

EU/EEA candidates — not eligible	Deleted within 30 days of screening date
EU/EEA candidates — screened, not referred	Deleted within 60 days of last contact
EU/EEA candidates — registered on Hire Abroad	Deleted from TGC systems within 30 days of confirmed registration
SA candidates — unsuccessful	Retained for 6 months, then securely deleted
SA candidates — successfully placed	Retained for 5 years from placement date
Employer / business enquiries	Retained for 2 years from last contact
Website technical / analytics data	Retained for up to 12 months

At the end of each applicable retention period, personal information is securely deleted or anonymised. You may request earlier deletion as described in Section 7.

7. Your Rights as a Data Subject

In terms of POPIA, you have the following rights in relation to your personal information:

Right of Access (POPIA Section 23) You may request a record or description of the personal information we hold about you.



Right to Correction or Deletion (POPIA Section 24) You may request that we correct or delete personal information that is inaccurate, irrelevant, excessive, outdated, incomplete, or misleading.

Right to Object (POPIA Section 11(3)) You may object at any time to the processing of your personal information on reasonable grounds, unless legislation provides for such processing.

Right to Withdraw Consent (POPIA Section 11(1)(a)) Where processing is based on your consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing prior to withdrawal.

Right to Complain (POPIA Section 74) You have the right to submit a complaint to the Information Regulator of South Africa if you believe your personal information has been processed unlawfully.

To exercise any of the above rights, contact our Information Officer: Email: info@thegiftedconsultants.com Subject line: POPIA Data Rights Request — [Your Name]
We will respond within a reasonable period as required under POPIA.

8. Information Regulator of South Africa

If you are not satisfied with how we have handled your personal information or responded to your request, you have the right to lodge a complaint with the Information Regulator:

Organisation	Information Regulator (South Africa)
Website	www.justice.gov.za/inforeg
Email	inforeg@justice.gov.za
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Tel	+27 10 023 5207

9. Security of Your Personal Information

We take the security of your personal information seriously and maintain the following technical and organisational measures:

- Password-protected, access-controlled accounts — Google Workspace with two-factor authentication
- Encrypted data transmission (HTTPS) on all digital platforms
- Access to personal information restricted to authorised personnel only
- Data Processing Agreement with Hire Abroad governing all cross-border processing
- Regular review of data handling practices in line with POPIA and APSO requirements

In the event of a security compromise involving your personal information, we will notify you and the Information Regulator as required by POPIA Section 22.

10. Children's Personal Information



Our services are directed at adults aged 18 years and over. We do not knowingly collect personal information from persons under the age of 18. POPIA Section 34 prohibits the processing of personal information of children without the consent of a competent person. If we become aware that we have inadvertently collected personal information from a person under 18, we will delete it immediately. Please contact info@thegiftedconsultants.com if you believe this has occurred.

11. Updates to This Notice

This POPIA Processing Notice is reviewed and updated whenever there is a material change to our processing activities, our business structure, or applicable law. The current version is always available at www.thegiftedconsultants.com/popia-notice. The version number and effective date are shown at the top of this document.

12. Contact the Information Officer

For any questions about this notice or how we handle your personal information, please contact:

Information Officer	Sinikiwe Zondi, Director
Company	The Gifted Consultants (Pty) Ltd
Email	info@thegiftedconsultants.com
Telephone	+27 87 265 6714
Address	Pharos House, 70 Buckingham Terrace, Westville, KwaZulu-Natal, 3629
Web	www.thegiftedconsultants.com/popia-notice