Privacy Policy

Loopi Jobs

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1. Who we are

The Loopi Jobs platform is operated by **Tech Genius CC** (registration number **2006/136742/23**, VAT number **4770247395**), a close corporation registered in the Republic of South Africa, with its business address at **c/o Smit & Hugo Prokureurs, 58 Lang street, Kuilsrivier, 7580**.

In this policy, **"we"**, **"us"** and **"our"** mean Tech Genius CC. **"You"** and **"your"** mean you, the person whose information we are describing.

We are the **responsible party** for the personal information described here, as that term is used in the Protection of Personal Information Act, 2013 ("**POPIA**").

Information Officer: Maarten Krüger, registered with the Information Regulator.

Privacy enquiries: info@techgenius.co.za

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2. What this policy covers

This policy covers the Loopi Jobs website and web application at https://loopi.co.za, and everything we do with personal information on it.

It applies to you whether you are:

- a **Networker** — anyone who signs up, invites people, and builds a network;
- a **Candidate** — a Networker who has also chosen to be findable for work; or
- an **Advertiser user** — a person using the Platform on behalf of a recruitment agency or an employer.

Different parts apply to different roles, and we say which where it matters.

This policy is a **notice**, not a contract. Your contract with us is the *Networker and Candidate Terms*, or the *Advertiser Terms* if you are an Advertiser. Where those terms and this policy differ on how we handle your personal information, **this policy applies**.

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3. The short version

We are not a job board that publishes your CV. **You are anonymous on Loopi by default.**

An Advertiser searching the Platform sees what you do, where you work, what you are looking for and what you are worth — but not who you are. They cannot see your name, your contact details, your ID number, your CV or the name of your employer until they **pay to reveal you**. Only that one Advertiser gets that information, and only about you. **The one exception to paying:** if you joined through an Advertiser's invitation link, or through the link of somebody who did, you are in that Advertiser's own network, and it can reveal you without paying — see Networker Terms clauses A7.1A and A10B.4.

Some things we never show an Advertiser at all, before or after a reveal — your ID number among them.

If you stop being a Candidate, or close your account, we delete your Profile. We do not keep a hidden copy so that you can be found later.

The rest of this policy is the detail.

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4. What we collect, and why

4.1 Everyone who signs up

What	Why we need it	Our lawful basis
Your name and surname	To identify your account and address you	Performing our contract with you — POPIA s11(1)(b)
Your email address	To create your account, verify it, and reach you about it	s11(1)(b)
Your mobile number	To verify you are a real person, and to reach you	s11(1)(b)
Your password	To keep your account secure. We store it hashed and cannot read it	s11(1)(b)
Your invitation link and who invited you	To record who joined through whom, for your network and the leaderboard	s11(1)(b)

Your position in the network is never shown to an Advertiser. Who invited you, and whom you invited, is used for the leaderboard, and to show the Networkers above you what is described below — and for nothing else.

You are on the leaderboard from the moment you register, under an alias we give you. Other signed-in members see your alias, your score, and how many people have joined your network, are in it now and are candidates. They never see your name. **Advertisers can see the leaderboard too. You can leave at any time** — your row disappears, and you can come back later.

The Networker who invited you sees that you joined, when, and whether you have confirmed your cell number — and your name, only if you agreed to it when you registered. **Networkers above you see numbers, never names:** how many people are in their network, how many have confirmed their cell number and how many are candidates, with direct invites counted separately. Nobody is shown which person is a candidate, but where only a few

people joined through the same link, the person who invited them may be able to work it out. See Networker Terms A10B.

4.2 If you choose to become a Candidate

Becoming findable for work is optional, and it is a separate decision from signing up.

What	Why we need it	Our lawful basis
Your South African ID number, or your passport number and nationality	To confirm you are a real, unique person and that you are 18 or older. It is **never** shown to an Advertiser, before or after a reveal, and is never something an Advertiser can search on	s11(1)(b)
Your date of birth	To enforce the 18+ rule, and to show an Advertiser an age band once they have affirmed a lawful reason (section 5)	s11(1)(b)
Your home city or town	To match you to work near you. We do not ask for your street address	s11(1)(b)
Your current job, employer industry, duties, salary and working arrangement	This is what an Advertiser searches on	s11(1)(b)
The job you want next, your availability and whether you would relocate	Same	s11(1)(b)
Your skills and certifications	Same	s11(1)(b)
Your qualifications and professional registrations	Same	s11(1)(b)
Your CV	So that an Advertiser who has paid to reveal you can read it, and so you can apply for jobs. We may also read it automatically to fill in your Profile — see section 11	s11(1)(b)

What	Why we need it	Our lawful basis
A copy of your ID or passport	To check that the ID number you gave us is really yours	s11(1)(b)
Your Employment Equity information	See section 5 — this is different, and it is optional	Your consent — POPIA s27(1)(a)

We delete the copy of your ID or passport once a person has checked it. We keep a record that it was checked, by whom and when. We do not keep the image.

We work out two things from your ID number and do not ask you for them twice: your date of birth, and the sex marker the number encodes. **The sex marker is internal only.** It is never shown to an Advertiser and is never used as a search filter. The gender question we ask you on your Profile is a separate, self-declared answer, and it is the only one an Advertiser can ever see.

4.4 If you are an Advertiser user

What	Why we need it	Our lawful basis
Your name and work email address	To give you access on behalf of your organisation	s11(1)(b)
Your organisation's registration details, address and website	To confirm the organisation is real before it searches real people's information	s11(1)(b) and our legitimate interests — s11(1)(f)
A record of every restricted search you run, and of the lawful reason you affirmed	Because we have to be able to show who looked at sensitive information and why	s11(1)(f), and to comply with POPIA
A record of every reveal you buy	Billing, and so we can tell the Candidate who has seen them	s11(1)(b)

Your affirmation and your search log are attached to you personally, not only to your organisation. We may have to give that log to the affected Candidate, to the Information Regulator, to the Commission for Employment Equity, or to a court.

4.4A If you ask us about advertising

If you fill in the form asking us about a free trial or a package, we collect:

What	Why we need it	Our lawful basis
Your name, surname, role, work email and mobile number, and your company's name	To contact you about what you asked for	Steps you asked us to take towards an agreement — s11(1)(b)
Whether you are an employer or a recruitment agency, the package you are interested in, roughly how many vacancies you fill or how many recruiters you have, and anything else you tell us	To suggest the right package	s11(1)(b)

We use this only to contact you about your enquiry. We do not add you to a mailing list. If you do not become a customer, we delete it 12 months after you sent it.

4.5 Information we collect automatically

- **How you use the Platform** — pages viewed, searches run, adverts opened, how often you visit. We use this to improve matching and the product. Where we report on it, we do so in a form that does not identify you. *Lawful basis: our legitimate interests, s11(1)(f).*
- **Technical information** — IP address, browser, device and log data, captured for security, fraud prevention and diagnosing faults. *Lawful basis: s11(1)(f).*

We do **not** buy personal information about you from anyone, and we do not scrape it from other websites. Everything we hold about you came from you, from the person who invited you (your email address, when they sent you an invitation), or from what you did on the Platform.

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5. Employment Equity information — special personal information

We ask Candidates four optional questions: **population group, gender, whether you have a disability, and the basis on which you are a South African citizen.** We also work out an **age band** from your date of birth.

Answering is entirely up to you.

- The page these questions appear on can be **skipped in its entirety**. You can leave every one of them blank.

- **"Prefer not to say" is a full answer** on all of them, and it means the same thing as leaving the question blank: you will not be filtered on it.
- The **gender** question is asked earlier, on your first Profile page, and you must choose something — but "Prefer not to say" sits alongside the other answers and costs you nothing.
- Saying nothing costs you nothing else. Your Profile is not weakened, and you are not ranked lower.

Why we ask. South African employers and recruiters hire against Employment Equity and B-BBEE obligations, against inherent requirements of a job, and against youth programmes. If you want to be found for those opportunities, this is the information that finds you. If you would rather not be, do not answer.

Our lawful basis is your consent — POPIA s27(1)(a). Choosing to answer *is* the consent; there is no separate tick box, because a tick box on top of an optional question adds a step without adding a choice. **You can withdraw it at any time by clearing your answers**, and once cleared they cannot be filtered on again.

The age band is different, and we want to be straight about it. Your date of birth is compulsory, because we may not have anyone under 18 on the Platform. That means you cannot decline the age band the way you can decline the other four. What protects you instead is that an Advertiser cannot see or filter on it without affirming a lawful reason first, and every one of those uses is logged.

An Advertiser cannot see or filter on any of this by default. Before they can, they must affirm to us that they have a lawful reason — Employment Equity, B-BBEE, an inherent requirement of the job, or a statutory youth programme — and **every single use is logged against the person who ran it.** We express no view on whether their reason is a good one; that is their responsibility and their risk, and the log is what makes it answerable.

We never infer any of this from your ID number.

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6. How Advertisers see you

This is the part of the Platform most worth understanding, so it is set out in full.

6.1 Never shown to an Advertiser — before or after a reveal

Your ID or passport number. The sex marker we derived from your ID. Whether your ID checksum passed. Your invitation code, who invited you, and whom you invited. The history of changes you have made to your Profile.

6.2 Shown to any Advertiser, free

Your home city or town. Your nationality and, if relevant, when your work permit expires. Whether you are employed, contracting, self-employed, studying or unemployed. Your job title, the city you work in, when you started, what you do, what you earn and how you work. The **industry** of your employer — but not its name. What you want next, when you are available, whether you would relocate. Your skills and certifications. Your qualifications. Your professional registrations and whether they are in good standing, but not the registration numbers. Whether your account and mobile number are verified.

None of this identifies you, and that is deliberate. It is enough for an Advertiser to decide whether you are worth paying to reach, and not enough to reach you.

6.3 Shown only once an Advertiser affirms a lawful reason

The four Employment Equity answers you chose to give, and your age band. See section 5.

6.4 Shown only after an Advertiser has paid to reveal you

Your name and surname. Your email address. Your phone numbers. Your professional registration numbers. Your home address. Your CV, in full. The name of the company you work for. Your exact date of birth.

A reveal is one Advertiser, one Candidate, one time. It does not make you public, it does not add you to a list, and it does not unlock you for anyone else. We cannot un-tell an Advertiser what they have already been told, but a reveal does expire, and after it expires that Advertiser loses access again.

You can see who has revealed you. POPIA s23 entitles you to know which third parties have had access to your information, and a reveal is exactly that. Ask us and we will tell you, and the Platform shows you your own reveal history.

6.5 What we never do

We do not sell your personal information. We do not rent it, and we do not share it with anyone for their own marketing.

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7. Who else we give your information to

Service providers who process it for us, under written contracts that bind them to use it only on our instructions and to keep it secure — POPIA s21:

Who	What they handle
Our cloud hosting provider (Amazon Web Services, Cape Town)	Everything — the database, the application, uploaded documents
Our email provider (xneelo, South Africa)	The emails we send you, including their content
An artificial intelligence provider, if and when we read CVs automatically	Your CV, to extract information from it for your Profile

Advertisers, when one of them pays to reveal you (or reveals you without paying, because you are in its own network), or when you apply for a job they have advertised. Applying to a job discloses you to that Advertiser deliberately — that is what applying means.

Other people, only where the law requires it or allows it: to comply with a court order or a lawful request; to establish, exercise or defend a legal claim; to the Information Regulator; and to the Commission for Employment Equity or a court, where a restricted-search log is called for.

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8. Where your information is kept

Your information is kept in South Africa. The Platform runs in Amazon Web Services' Cape Town region (`af-south-1`), and that is where your Profile, your CV, your documents and our database live, including their backups.

The emails we send you are handled in South Africa too — our email provider is xneelo, a South African company.

Nothing about the Platform is processed outside South Africa today. If that ever changes — for example if we start using a service that reads CVs — we will update this section before we do, and we will only use a provider bound to protect your information to a standard comparable with South African law.

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9. How long we keep it

What	How long
Your Profile, while you are a Candidate	Until you stop being a Candidate or close your account

What	How long
Your Profile, after you leave	**Deleted.** Your CV, contact details, skills, certifications, qualifications, professional registrations and Profile change history are deleted outright
Your copy of ID or passport	Deleted as soon as a person has checked it
Your account, after you close it	Deleted. Your place in the network survives, but it holds no personal information about you
A record that we suspended your account, and why	3 years after the suspension ends — disputes
Records of reveals and the related payments	7 years — tax, audit and disputes
A record of which terms you accepted, and when	Kept, so that both of us can prove what was agreed
Your enquiry, if you asked us about advertising and did not become a customer	12 months after you sent it, then deleted
Emails we sent you	**90 days**, then deleted — body, addresses and all
Restricted-search logs	7 years after the Advertiser's account closes — discrimination complaints and disputes
Information that has been de-identified so it cannot be traced back to you	Indefinitely, for statistics and to improve the Platform

On emails, so there is no confusion: we delete every email older than 90 days on a rolling basis. We do **not** run a separate deletion when you close your account, because an email that merely mentions you cannot be found by searching for your address — a partial deletion would look complete without being complete. The 90 day rule catches everything, including those.

9.1 Backups — please read this, because "deleted" means two things

Everything in the table above describes the **live Platform**. We also keep backups, so that a failure, a mistake or an attack does not lose everyone's information.

When something is deleted, it goes from the live Platform straight away — but it stays in our backups until those backups expire, which takes up to 6 months.

That applies to all of it: your Profile when you close your account, your CV when you remove it, your Employment Equity answers when you clear them, and the emails we delete at 90 days.

While information sits in a backup:

- **it is encrypted**, so a copy is unreadable to anyone who obtains it without our keys;
- **nobody works from it.** Backups are not searched, not queried, and never used to serve the Platform or to answer a question about you;
- **access to it is restricted** to the few people who run our infrastructure;
- **we restore one only to recover from a serious failure**, not as a matter of routine.

After the backup period passes, the copy is gone with the backup. We do not keep an archive beyond it.

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10. How we protect it

We are required by POPIA s19 to take appropriate, reasonable technical and organisational steps to protect your information.

What we do includes:

- encrypting your information in transit and at rest;
- keeping our databases and servers off the public internet, reachable only through a controlled entry point; and
- requiring multi-factor authentication for access to our hosting infrastructure.

No system is perfectly secure, and we do not claim otherwise. If your information is compromised in a way that creates a real risk to you, we will notify you and the Information Regulator, as POPIA s22 requires.

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11. Automated processing

We may match your Profile to job adverts automatically, and use what you do on the Platform to decide what to show you. If we do, it affects what you are shown; it does not make any decision about you.

We may read your CV automatically, including with artificial intelligence, to extract information from it and fill in parts of your Profile for you. Whether or not we do, you can fill in and correct your Profile yourself. Your CV is also disclosed to an Advertiser who pays to reveal you, and to an Advertiser you apply to.

We do not screen what you type before an Advertiser sees it. See the warning in section 6.2.

No decision with a legal or similarly substantial effect on you is made solely by automated means. If that ever changes, POPIA s71 gives you the right to be told and to make representations to a person, and we will change this policy before it changes.

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12. Messages we send you

Messages about your account — verifying your email, confirming things you have done, telling you about a reveal — are part of the service and you cannot turn them off while you have an account.

Job alerts and recommendations — if we send you one, it will tell you how to stop it, and stopping one does not stop the others.

Marketing about our own services — if you are a Candidate or a Networker, only if you asked for it when you registered. **If you are an Advertiser, we may send it and you can opt out at any time.** Either way every message carries an unsubscribe link, and objecting is free and needs no formality.

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13. Cookies

A cookie is a small file a website stores on your device. We use them only to make the Platform work.

What it does	Why we need it	How long it lasts
Keeps you signed in	So you do not have to sign in again on every page	7 days, and it starts again each time you use the Platform

We do not use cookies for advertising, and we do not let anyone else set cookies through the Platform. No tracking pixels, no advertising networks, no third-party analytics.

Because all of these are strictly necessary for the Platform to work, we do not ask you to accept them — without them you could not sign in at all. If we ever add a cookie that is not strictly necessary, we will ask you first.

You can block or delete cookies in your browser settings. If you block ours, you will not be able to sign in.

14. Your rights

Under POPIA you have the right to:

- **Know what we hold about you**, and to be given a copy — s23;
- **Have it corrected or deleted** where it is wrong, misleading, out of date, incomplete, irrelevant or excessive — s24;
- **Object to us processing it**, on reasonable grounds, where our basis is legitimate interests — s11(3)(a);
- **Withdraw consent** you have given, at any time, where consent is our basis. This is how you take back your Employment Equity answers — s11(2)(b);
- **Object to direct marketing** at any time, free of charge — s11(3)(b) and s69;
- **Not be subject to a decision** based solely on automated processing that has a legal or similarly substantial effect on you — s71;
- **Complain to the Information Regulator** — s74.

Most of these you can exercise yourself, without asking us: edit your Profile to correct it, clear your Employment Equity answers to withdraw that consent, stop being a Candidate to remove yourself from search, or close your account to delete your Profile entirely. That is faster than writing to us, and it is why the buttons exist.

For anything else, write to info@techgenius.co.za. **We will respond within 30 days.** We may need to confirm who you are first — we are not going to hand your information to somebody who says they are you.

Requests under the **Promotion of Access to Information Act** are handled through our PAIA manual, at https://www.techgenius.co.za. A request under s23 of POPIA may attract a prescribed fee; we will tell you before we charge one.

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15. Children

The Platform is for people aged 18 and over. We check your date of birth when you create a Profile and we refuse anyone under 18. We do not knowingly collect personal information about children, and we do not process it under POPIA s34.

If you believe a child has given us information, tell us at info@techgenius.co.za and we will delete it.

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16. Changes to this policy

We may change this policy. When we do, we publish the new version at https://loopi.co.za/privacy and change the date at the top.

The version published there is always the current one, and we do not undertake to notify you individually when it changes. Your dashboard carries a permanent line naming the version of the terms that applies to you and when it took effect.

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17. Contacting us, and complaining

General support	support@loopi.co.za
Privacy, and requests about your personal information	info@techgenius.co.za
Reporting abuse or misuse of your information	abuse@loopi.co.za
Security concerns	security@loopi.co.za
Postal address	c/o Smit & Hugo Prokureurs, 58 Lang street, Kuilsrivier, 7580

Information Officer: Maarten Krüger, registered with the Information Regulator.

Please come to us first. Most privacy problems are quicker to fix than to complain about, and we would rather fix them.

If you are not satisfied with how we have handled a privacy matter, you may complain to the **Information Regulator (South Africa)**:

Complaints about personal information	POPIAComplaints@inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
Telephone	010 023 5200
Toll free	0800 017 160

Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Website	inforegulator.org.za