



OPEN CAPITAL TALENT DIAGNOSTIC WEBSITE PRIVACY POLICY

Open Capital (OCA) is committed to respecting your privacy and protecting your personal information and data. This policy outlines how and why we collect, process, and handle personal information. This policy also informs individuals (“you”, “your”, or “their”) about their rights regarding this data. It applies to personal data provided to us, both by individuals themselves, or by others. Our policy is to be transparent about why and how we process personal data.

OCA is a private company limited by shares that seeks to advance African economies and develop the next generation of business leaders. This privacy notice is issued on behalf of OCA and applies to all the products and services offered by OCA through this website.

Relevant Regulations

For the purposes of personal information and data, OCA’s policy is designed to meet the requirements and uphold the principles in the European Union’s (“EU”) General Data Protection Regulations (“GDPR”). OCA utilizes the definition in the GDPR of personal data for the purposes of this policy. Pursuant to that definition, OCA considers personal data to be information in any format that relates to a living individual who can be identified by that information, either on its own or when it is combined with other information held by us.

Collection of Personal Information

We will only collect personal information where the data is reasonably necessary for a genuine business-related purpose. This data is typically collected directly from you for the agreed purposes of potentially receiving services from you, receiving services from us, or keeping you informed about OCA’s work. The types of personal information we may collect includes but is not limited to:

- Personal and/or company related demographic data such as name, age, and gender.
- Postal & residential address.
- Personal contact details (e.g. telephone, email, or facsimile number).
- Occupation, references and previous employment history, qualifications, and skills.
- Information provided by you through our website or, if applicable, social media (such as Facebook or Twitter accounts).
- Information provided through other public media forums (e.g. LinkedIn, Devex, etc.).
- Account information which including:
 - Registration information such as first name, last name, password, email address, etc. or any 3rd party information you may use to register e.g. LinkedIn account details.
 - Billing information such as name, physical and email address, account information (e.g. credit, debit or VISA card name, number, expiry date and CVV, etc.).
 - Account settings such as language preferences, country/time zones, communication preferences, etc.
- Your contractual and performance history with us.

OCA collects personal information in a lawful and fair manner, and it will only be obtained from you if it is deemed reasonable and practicable. We collect this information in a variety of ways, including but not limited to:

- Applications or responses submitted by you for the delivery of services.
- Surveys sent out through our website to collect demographic information.
- Enquiries made by you through our website or if applicable social media accounts.
- If applicable when you follow our social media accounts and register or subscribe to our mailing list.
- Through government agencies or third-party reporting services as legally required,
- Applications by you to attend events such as conferences, meetings, and trainings.

- Through direct communication between you and OCA personnel, such as email, mail, by telephone and meetings.
- We may also collect sensitive personal information where we are permitted to do so by law (e.g. criminal record activity following stringent vetting processes) and information related to health.

OCA primarily relies on the consent of individuals to collect, process, and hold their data. You may opt not to provide consent or not provide certain personal information requested; however, doing so may result in OCA not being able to provide you with services or contacting you. OCA strives to keep the personal data we hold relevant, updated, and correct. If there is a change in your personal data, please inform OCA so that we may update your information as required.

Use of Personal Data

We use the personal information for the following purposes:

- Providing you services.
- Assessing your suitability for potential delivery of services or contracting and receiving services from you.
- Submission of documents to our clients.
- Keeping you informed about OCA's work.
- Determining how to make our products and services better.
- Compliance with relevant laws or other legal requirements.

Sharing of Personal Information

OCA will only share your personal information with others when we are legally permitted to do so. OCA includes contractual language with third parties regarding data protection, confidentiality, and security guidelines. If your personal data is subject to the EU GDPR, OCA ensures that any transfer of data will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission approved standard contractual clauses. Personal data and information that OCA holds may be transferred to the following types of organizations:

- Sub-contractors who are providing services to us in relation to services we provide to our clients.
- Third-party organizations that provide support services (e.g. insurance providers).
- Professional advisors, such as lawyers, auditors, and accountants.
- Clients or potential clients for marketing purposes or where you apply to work with us.
- Law enforcement, government, or other regulatory agencies as provided for by law.

OCA does not sell your personal data to third parties.

Retention of Personal Information

It is not our intent to keep personal information for longer than reasonably required. The duration depends on the nature of the personal data and the purposes for which it was received. OCA maintains a data retention policy informed by:

- Legal or regulatory requirements of the location of the data processing.
- The completion of a contract with you or work you supported with our clients.
- If your personal data is held for reasons other than legal requirement or contractual engagement (e.g. newsletter, recruitment database), we will maintain that data until you request its removal or correction.

Your Rights Regarding Your Personal Data

The EU-GDPR details an individual's rights regarding their personal data. OCA respects and supports these rights and applies them to personal data held. These rights include:

Right to Access – subject to certain conditions, you are entitled to have access to your personal data. You may contact OCA to request a copy of your personal data held by us.

Right to Data Portability – subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.

- Right to Correction – you may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date.
- Right to Object to or Restrict Processing – subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.
- Right of Erasure – subject to certain conditions, you are entitled to have your personal data erased (e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful).
- Right to Withdraw Consent – as stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time. If you withdraw your consent, this will only take effect for future processing and is subject to certain conditions based on OCA's legal obligations.

To act on any of the above rights, OCA may need to request additional information regarding the specifics of the request as well as confirm your identity. We will respond to these requests in accordance with regulatory requirements once we confirm the validity of the request. Requests regarding these rights can be submitted to OCA by following the instructions in the "Contact for Requests and Complaints" section below.

Breaches of Personal Data

OCA applies best business practices and secure systems to protect personal information. If a data breach that included personal information were to occur, OCA will respond to the breach as required by the relevant regulations. If you are aware of a breach of personal data that concerns OCA, please contact contact@opencapital.com immediately.

Information Collected by OCA's Websites

OCA collects anonymized data about visitors to our websites. Our primary goal in collecting this information is to provide the user with the most useful content and services. No personally identifiable information is collected or maintained without the user's consent. OCA uses HTTP cookies to improve the performance of our site, cookies are small bits of data we store on the devices you use so that we can recognize repeat users. These cookies disappear after a certain period. All retained data is anonymized—no personally identifiable information is collected, stored, or placed in cookies that can be accessed by third parties.

OCA will also collect information about the surveys you chose to issue your company including but not limited to, the type of survey issued, the number of employees the survey was issued for, the number of employees that filled the survey, the language choice and preference, the frequency with which you take each survey (e.g. annually, monthly or weekly), etc. for the purpose of improving your experience on this website.

Account information

Account information will be used to run and manage your account, make services available to you and bill you for these services and contact you in case of any updates or other relevant account information that needs to be shared. We may send you communications of a transactional nature e.g. service-related announcements, billing matters and changes to our services or policies.



We process information about your account like company details, number of staff, number of survey respondents and other feedback you may share, for purpose of improving your service experience on this website.

Images Utilized by OCA

OCA utilizes images collected by our personnel to demonstrate the nature and impact of our work. OCA seeks consent to the degree practical from the individuals depicted in these images. If your likeness is reproduced in any of the images hosted on the OCA website and you would like these images to be deleted, please contact the administrator who will promptly act.

Contact for Requests and Complaints

We have appointed a member of our team who is responsible for overseeing questions in relation to this privacy policy. If you would like additional details regarding OCA's Privacy Policy, to submit a request regarding your personal information, or to submit a complaint please contact contact@opencapital.com.