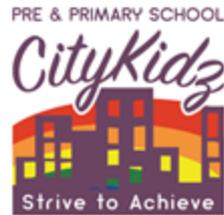


CITYKIDZ PRE & PRIMARY



INFORMATION:

PROTECTION OF INFORMATION AND CONFIDENTIALITY



PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013 ("POPI")

1. Introduction

This document is the policy on the protection of personal information of CityKidz Pre & Primary School, as approved by the school directors and management. The policy has been drafted in accordance with the Constitution of the Republic of South Africa, 1996; the Protection of Personal Information Act 4 of 2013 (POPIA), the Promotion of Access to Information Act 2 of 2000, the South African Schools Act 84 of 1996, and other applicable legislation on school education.

As an independent school, schools have to comply with POPIA. The act requires public bodies to inform data subjects of the manner in which their personal information is used, disclosed and destroyed.

CityKidz Pre & Primary School is committed to protecting the privacy of all data subjects, and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.

This policy sets out the manner in which CityKidz Pre & Primary School deals with personal information and stipulates the purpose for which said information is used.

In technical terms, it is a "general information protection statute" designed to prevent the negligent disclosure of personal information. This means that an organisation or "responsible party" can only capture, use and store personal information with express consent. This is applicable to personal information of individuals as well as personal information relating to 'juristic persons', e.g. companies or organisations.

2. The purpose of the Act is to:

- safeguard personal information in line with the constitutional right to privacy in line with international standards for data protection;
- regulate the manner in which personal information is processed;
- provide rights and remedies to protect personal information;
- establish an Information Protection Regulator.

3. Personal information

- Personal information is 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 (such as the School), including, but not limited to information concerning:
 - a. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - b. information relating to the education or the medical, financial, criminal or employment history of the person;

- c. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - d. the biometric information of the person;
 - e. the personal opinions, views or preferences of the person;
 - f. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - g. the views or opinions of another individual about the person; and
 - h. the name of a person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- The Act only protects private information and any information shared publicly will automatically fall outside of the protection of the POPI Act. If, for example, an e-mail address or telephone number is listed on a person's Facebook page and that information is publicly available, then it's free for companies to collect and use. Protection under POPI cannot then be claimed if this information gets used.

4. Collection of Personal Information

We collect and process your Personal Information mainly to provide you with access to our services and products, to help us improve our offerings to you, to support our contractual relationship with you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you purchase or supply a product or services to or from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Examples of information we collect from you are:

- name
- address
- email address
- telephone/cell number
- user-generated content, posts and other content you submit to our web site

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in our industry in order to offer you a more consistent and personalized experience in your interactions with CityKidz Pre & Primary School.

5. How we use your information

We may use the information we collect from you when you register, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features. We will use your information only for the purposes for which it was collected or agreed with you, for example:

- Analyse the effectiveness of our advertisements, competitions, promotions and surveys.
- For audit and record keeping purposes
- For monitoring and auditing site usage

- Personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it
- To carry out our obligations arising from any contracts entered into between you and us
- To conduct market or customer satisfaction research or for statistical analysis
- To confirm and verify your identity or to verify that you are an authorised customer for security purposes
- To notify you about changes to our service
- To respond to your queries or comments

We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. Once personal information has served its purpose, it should be destroyed, except where there are legal requirements for keeping records or if the necessary consent has been obtained. In order to protect information from accidental or malicious destruction, when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems.

6. Employees and other persons acting on behalf of the school

- 6.1 Employees and other persons acting on behalf of the School will, during the course of the performance of their services, gain access to and become acquainted with the personal information of certain clients, suppliers and other employees.
- 6.2 Employees and other persons acting on behalf of the School are required to treat personal information as a confidential business asset and to respect the privacy of data subjects.
- 6.3 Employees and other persons acting on behalf of the School may not directly or indirectly, utilise, disclose or make public in any manner to any person or third party, either within the School or externally, any personal information, unless such information is already publicly known or the disclosure is necessary in order for the employee or person to perform his or her duties.
- 6.4 Employees and other persons acting on behalf of the School must request assistance from the Information Officer if they are unsure about any aspect related to the protection of a data subject's personal information.
- 6.5 Employees and other persons acting on behalf of the School will only process personal information where:
 - a. The data subject, or a competent person where the data subject is a child, consents to the processing; or
 - b. The processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is a party; or
 - c. The processing complies with an obligation imposed by law on the responsible party; or
 - d. The processing protects a legitimate interest of the data subject; or
 - e. The processing is necessary for pursuing the legitimate interests of the School or of a third party to whom the information is supplied.
- 6.6 Furthermore, personal information will only be processed where the data subject:
 - a. Clearly understands why and for what purpose his, her or its personal information is being collected; and

- b. Has granted the School with explicit written or verbally recorded consent to process his, her or its personal information.
- 6.7 Employees and other persons acting on behalf of the School will consequently, prior to processing any personal information, obtain a specific and informed expression of will from the data subject, in terms of which permission is given for the processing of personal information.
- 6.8 Informed consent is when the data subject clearly understands for what purpose his, her or its personal information is needed and who it will be shared with.
- 6.9 Consent can be obtained in written form which includes any appropriate electronic medium that is accurately and readily reducible to printed form. Alternatively, the School will keep a voice recording of the data subject's consent in instances where transactions are concluded telephonically or via electronic video feed.
- 6.10 Consent to process a data subject's personal information will be obtained directly from the data subject, except where:
- a. the personal information has been made public, or
 - b. where valid consent has been given to a third party, or
 - c. the information is necessary for effective law enforcement
- 6.11 Employees and other persons acting on behalf of the School will under no circumstances:
- a. Process or have access to personal information where such processing or access is not a requirement to perform their respective work-related tasks or duties.
 - b. Save copies of personal information directly to their own private computers, laptops or other mobile devices like tablets or smart phones. All personal information must be accessed and updated from the School's central database or a dedicated server.
 - c. Share personal information informally. In particular, personal information should never be sent by email, as this form of communication is not secure. Where access to personal information is required, this may be requested from the Information Officer.
 - d. Transfer personal information outside of South Africa without the express permission from the Information Officer.
- 6.12 Employees and other persons acting on behalf of the School are responsible for:
- a. Keeping all personal information that they come into contact with secure, by taking sensible precautions and following the guidelines outlined within this policy.
 - b. Ensuring that personal information is held in as few places as is necessary. No unnecessary additional records, filing systems and data sets should therefore be created.
 - c. Ensuring that personal information is encrypted prior to sending or sharing the information electronically.
The IT Liaison Official/Manager will assist employees and where required, other persons acting on behalf of the School, with the sending or sharing of personal information to or with authorised external persons.
 - d. Ensuring that all computers, laptops and devices such as tablets, flash drives and smartphones that store personal information are password protected and never left unattended. Passwords may not be shared with unauthorised persons.
 - e. Ensuring that their computer screens and other devices are switched off or locked when not in use or when away from their desks.
 - f. Ensuring that where personal information is stored on removable storage medias such as external drives, CDs or DVDs that these are kept locked away securely when not being used.

- g. Ensuring that where personal information is stored on paper, that such hard copy records are kept in a secure place where unauthorised people cannot access it. For instance, in a locked drawer of a filing cabinet.
 - h. Ensuring that where personal information has been printed out, that the paper printouts are not left unattended where unauthorised individuals could see or copy them. For instance, close to the printer.
 - i. Taking reasonable steps to ensure that personal information is kept accurate and up to date. For instance, confirming a data subject's contact details when the client or customer phones or communicates via email. Where a data subject's information is found to be out of date, authorisation must first be obtained from the Information Officer to update the information accordingly.
 - j. Taking reasonable steps to ensure that personal information is stored only for as long as it is needed or required in terms of the purpose for which it was originally collected. Where personal information is no longer required, authorisation must first be obtained from the Information Officer to delete or dispose of the personal information in the appropriate manner.
 - k. Undergoing POPI Awareness training from time to time.
- 6.13 Where an employee, or a person acting on behalf of the School, becomes aware or suspicious of any security breach such as the unauthorised access, interference, modification, destruction or the unsanctioned disclosure of personal information, he or she must immediately report this event or suspicion to the Information Officer or the Deputy Information Officer.

7. Request to access personal information procedure

7.1 Data subjects have the right to:

- a. Request what personal information the School holds about them and why.
- b. Request access to their personal information.
- c. Be informed how to keep their personal information up to date.

7.2 Access to information requests shall be made in writing, including by email, addressed to the Information Officer, and directed to the School's Administration Manager

7.3 Once the written request has been received, the Information Officer will verify the identity of the data subject prior to handing over any personal information. All requests will be processed and considered against the School's POPIA Policy

7.4 The Information Officer will process all requests within a reasonable time.

8. Right to object

In terms of the POPI Act (POPIA) section 18. (h) (iv) you have the right to object to the processing of personal information as referred to in section 11(3) of the POPIA.

9. Right to lodge a complaint

In terms of the POPI Act (POPIA) section 18. (h) (v) you have the right to lodge a complaint to the Information Regulator (South Africa) (IRSA). The IRSA contact details are:

<https://www.justice.gov.za/infoereg/contact.html>

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10. Policy amendments

The school directors may amend, supplement, modify or alter this policy from time to time.

11. How to Contact us

If you have any queries about this policy or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at info@citykidz.co.za

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