



## POPIA (Protection Of Personal Information Act)

### Privacy policy

The school's online platform is a computerized data/personal information processing tool that simplifies administrative procedures related to the enrolment of students in the school. In this sense, we collect certain information necessary for the enrolment of students, re-enrolment, cancellation, billing, and many other usual processes of schooling. The school, as well as the provider of the school's platform, firmly undertake to respect a set of rules of good conduct to guarantee respect for the confidentiality of all data/personal information concerning you and your relatives. You agree to provide accurate and complete personal information. Should you fail to provide accurate Personal Information: we may refuse to process your request for enrolment.

- **Commitment to transparency:** Throughout this document, we detail how your personal data/personal information is obtained, stored, and processed.
- **Commitment to security:** technical and operational security measures meeting industry standards are applied to all levels of information processing, whether it is collection, storage, or backups.
- **Commitment to privacy:** no data/personal information is or shall ever be automatically disclosed to service providers or third parties. Certain information can sometimes (only after your authorization is explicitly collected) be transmitted to providers of the schools on the occasion of events such as school trips (travel agency, canteen, bus...) strictly within the limit of the needs of the event.
- **Commitment of provision:** from your online portal, you shall find functionalities allowing the access in consultation, correction, suppression, and export of all your personal data/personal information. The contact details of the Data Protection Officer / Information officer are given in this document.
- **Commitment to respect legislation:** our platform is following data/personal information protection legislation concerning you, in particular the General Data Protection Regulations coming into force on 25 May 2018 and the Protection of Personal Information Act 4 of 2013.

### Minors

If you are under 18 years of age (minor), we will require the consent of your parent/ legal guardian before we process such personal information.

### Data/personal information collected

We collect the following information through forms you are asked to fill in when students are enrolled or when we ask for your information to be updated during the year:

- Name
- First name
- Postal address
- Postal code
- E-mail address
- Telephone number
- Education / curriculum information
- Other information customizable by the school

The personal information we collect is entered through forms and through the interactivity established between you and our Web application. We also use, as described in the following section, cookies and/or logs to collect information about your use of the platform.

## Forms and interactivity

Your personal information is collected through forms, namely:

- Application registration form
- School registration, re-enrolment, deregistration forms
- Other personalized forms

We use the information thus collected for the following purposes:

- Management of students' schooling
- Contact with students and parents

Administrative processing (invoicing, collections, etc.)

## Processing of Information

### We will share your personal information:

1. in order to comply with applicable law or with legal process served on our school;
2. in order to protect and defend the rights or property of our school; and
3. with employees and/or third parties who assist us in providing services to you and thus require your personal information in order to render a proper and efficient service. We will ensure that all such employees and third party service providers, having access to your personal information, are bound by confidentiality agreements.

## Log files and cookies

You are aware that information and data is automatically collected through the standard operation of the Internet servers and through the use of "cookies." "Cookies" are small text files a website can use to recognize repeat users, facilitate the user's ongoing access to and use of the website and allow a website to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. Cookies are not programs that come onto your system and damage files. Generally, cookies work by assigning a unique number to you that has no meaning outside the assigning site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you with certain features (e.g., customized delivery of information) available on our Websites.

We collect certain information through log files and cookies. This mainly concerns the following information:

- IP address at registration
- Pages visited and requests

Connection time and day

The use of such files allows us:

- The improvement of the service and a personalized welcome
- To establish anonymous statistics

## Right to object and withdraw

We are committed to providing you with a right to object to and withdraw your personal information. The right to object is understood as being the possibility offered to users to refuse that their personal information be used for certain purposes mentioned at the time of collection. The right to opt-out is defined as the ability for users to request that their personal information be removed from, for example, a school mailing list. To exercise these rights, you can send a letter or e-mail to the following address:

Data protection officer / Information Officer: Frederique Etellin  
Address: 101 Hope Street, Gardens, Cape Town 8001  
E-mail : Daf@efdc.co.za  
Phone 021 461 2508  
Section : <https://lyceeducap.org.za/>

## Right of access

We undertake to grant a right of access and rectification to data/personal information subjects wishing to consult, modify or even delete information concerning them. This right can be exercised either through the school's platform or by contacting the school by post or e-mail at the following address:

Data protection officer / Information officer: Frederique Etellin  
Address: 101 Hope Street, Gardens, Cape Town 8001  
E-mail : Daf@efdc.co.za  
Phone : 021 461 2508  
Section : <https://lyceeducap.org.za/>

## Security

1. treat your personal information as strictly confidential;
2. take appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
3. promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information;
4. provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable request; and
5. We will not retain your personal information longer than the period for which it was originally required, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

ALTHOUGH WE TAKE THE AFOREMENTIONED PRECAUTIONS IN PROTECTING YOUR PERSONAL INFORMATION, WE SHALL HOWEVER NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION IF BEYOND OUR REASONABLE CONTROL.

The personal information we collect is stored in a secure environment. The people working at the school, as well as the provider of the platform, are required to respect the confidentiality of your information. To ensure the security of your personal information, we use the following technical measures:

- Access to the platform via secure connection (HTTPS)
- Access management: only authorized personnel are able to access the data/personal information
- Network monitoring, intrusion detection, and virus and Trojan defense software
- Encrypted computer backups with a key known only to the platform provider and that can only be restored on the original platform
- Your connection to the platform is protected by a login/password combination, and can be strengthened by using a strong authentication method (email or temporary code)
- The server hosting the school platform is protected by a hardware firewall and a software firewall.

We are committed to maintaining a high level of confidentiality by incorporating the latest technological innovations to ensure the confidentiality of your transactions.

## Transborder flow of data/personal information

Personal Information processed by us will be routed/transferred to a third party in a foreign country or International organization.

If transferred we will ensure that the recipient will be subject to law/agreement which provides similar protection to your personal information than the POPI Act.

### Legislation

We undertake to comply with the following legislative provisions, both technically and organizationally:

- GDPR (General Data/personal information Protection Regulation) coming into force on 25 May 2018
- POPI (2013) and PAIA (2000)

If you are in South Africa and not satisfied with our response to your query, you may approach the following regulatory body for further assistance:

The Information Regulator (South Africa)

JD House

27 Stiemens Street

Braamfontein

Johannesburg

2001

Complaints email: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)