
July 2024
Final Version



STEYN CITY

PARKLAND RESIDENCE

STEYN CITY PREPARATORY AND COLLEGE PROPRIETARY LIMITED

POPIA POLICY

July 2024

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1 INTRODUCTION

This Policy provides an overview of how Steyn City Preparatory and College Proprietary Limited ("**SCPC**" / "**the School**") will make sure Data Subjects understand how their Personal Information is processed. This includes, amongst others, providing Data Subjects with information about the School, how SCPC may be contacted, what information SCPC holds about the Data Subject, how the Personal Information is collected, the purpose for which SCPC uses Personal Information and whom SCPC shares it with.

2 PURPOSE

SCPC collects Personal Information for different purposes. Accordingly, this Policy is intended to ensure that Personal Information is dealt with properly and securely and in accordance with the Protection of Personal Information Act 4 of 2013 ("**POPIA**").

3 WHO ARE WE?

SCPC is a private school located at Riverside View. SCPC can be contacted at:

Tel: 010 597 1250

Email: info@steyncityschool.co.za

4 APPLICATION

- 4.1 This Policy will apply to Personal Information regardless of how it is used, recorded, and stored and whether it is held in hardcopy files or electronically.
- 4.2 SCPC promotes having a good appreciation of the law as it pertains to Data Protection and how it may affect our decisions in making an informed judgement about how Personal Information is Processed, including how such information is collected, used, and ultimately deleted. All personnel who handle Personal Information within SCPC must read, understand, and comply with this Policy.
- 4.3 This Policy is for guidance only and can be amended as necessary according to the Processing carried out by the School. SCPC must exercise an independent choice about the personal information it processes and is ultimately responsible for compliance with its obligations under POPIA.

5 WHAT PERSONAL INFORMATION DO WE PROCESS?

5.1 We either collect Personal Information directly from the Data Subject or receive it from third-parties, such as –

5.1.1 Adam Edutech CC / SAGE X3

5.2 SCPC only receives a Data Subject's Personal Information from third parties where there is a sound legal basis and purpose for doing so, such as –

5.2.1 to provide services to the public, such as admitting and registering learners into the School;

5.2.2 giving effect to learner development and support from a healthcare, social and wellness perspective, where permissible;

5.2.3 conducting surveys and research for improving our educational offering;

5.2.4 enabling law enforcement activities to take place where SCPC compliance is required by law; and

5.2.5 legislative and regulatory compliance.

5.3 When collecting and using Personal Information of Data Subjects, we undertake to comply with the data protection principles set out herein. Depending on the needs of the service SCPC is providing and the relevant purpose/s for Processing, we may collect some or all of the following types of Personal Information –

NATURE OF INFORMATION	REQUIRED INFORMATION
CONTACT & IDENTIFICATION	Parents <ul style="list-style-type: none">Names, surname, ID number, gender, address, contact details (email/mobile).

NATURE OF INFORMATION	REQUIRED INFORMATION
	<p>Learners</p> <ul style="list-style-type: none"> Names, surname, ID/birth certificate details and copies, school reports and general educational records, disciplinary records, photo of their likeness, current school (if applicable), name and date of birth of any sibling already attending the School, registration/enrolment details including study permits (if applicable). <p>Educators/Staff/Service Providers</p> <ul style="list-style-type: none"> Names, surname, ID number, educational background and qualifications, disabilities; and/or Registration details of professional nurses, psychologists, counsellors, therapists, social workers with their respective professional bodies (where applicable), and work permits. <p>Bursary Applicants</p> <ul style="list-style-type: none"> Names, surnames, contact details, ID number, address, and academic qualifications.
FINANCIAL	<p>Educators</p> <ul style="list-style-type: none"> Financial records (bank account, payment card, salary, benefits, pensions). <p>Third Parties</p> <ul style="list-style-type: none"> Tax clearance information.

6 SPECIAL PERSONAL INFORMATION

6.1 Special Personal Information relates to personal information concerning –

6.1.1 a Data Subject’s religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sexual orientation or biometric information; or

6.1.2 any criminal investigation or ongoing legal proceedings against a Data Subject.

6.2 Under certain circumstances, SCPC may need to collect and process the following Special Personal Information –

NATURE OF INFORMATION	REQUIRED INFORMATION
<p>SPECIAL PERSONAL INFORMATION</p>	<p>Parents</p> <ul style="list-style-type: none"> • Racial or ethnic origin; • Criminal behaviour/offences (including alleged offences); and/or • Religious or other beliefs of a similar nature. <p>Learners</p> <ul style="list-style-type: none"> • Medical (physical or mental health details); • Racial or ethnic origin; • Criminal behaviour/offences (including alleged offences); and/or • Religious or other beliefs of a similar nature. <p>Educators/Staff/Service Providers</p> <ul style="list-style-type: none"> • Racial or ethnic origin; • Criminal behaviour/offences (including alleged offences); • Religious or other beliefs of a similar nature; • Trade union membership;

NATURE OF INFORMATION	REQUIRED INFORMATION
	<ul style="list-style-type: none"> • Political affiliation; and/or • Political opinions.

6.3 Where personal information is listed above but does not fall under Special Personal Information, SCPC has done so to indicate its sensitivity and SCPC's commitment to only use such information in narrow circumstances and for necessary Purposes.

6.4 Accordingly, SCPC undertakes to process Special Personal Information of a Data Subject in circumstances where SCPC has –

6.4.1 your Consent;

6.4.2 a lawful basis;

6.4.3 public interest grounds; or

6.4.4 publicly available sources from which we retrieve the information.

7 SCPC WEBSITE

7.1 We collect certain information or data about a Data Subject when such person uses <http://www.steyncityschools.co.za/> ("**our website**"). SCPC specifically collects:

7.1.1 questions, queries or feedback a Data Subject leaves, including name and contact details;

7.1.2 details regarding which version of web browser the Data Subject used and other information about the Data Subject's device; and

7.1.3 information on how the Data Subject used the site, using cookies, for example.

7.2 The data SCPC collects on our website can be viewed by authorised people in the School as well as SCPC suppliers, where permissible, to:

7.2.1 improve the website by monitoring how it is used;

- 7.2.2 gather feedback to improve SCPC services;
 - 7.2.3 respond to any feedback a Data Subject sends The School, and if a response is requested;
 - 7.2.4 allow a Data Subject to access any of our online services; and
 - 7.2.5 on request, provide a Data Subject with information about SCPC services.
- 7.3 SCPC web data is stored on secure servers. Sending information over the internet is not completely secure, and SCPC cannot guarantee the security of your Personal Information while it is in transit. Any data sent by a Data Subject is at such persons own risk. However, SCPC have procedures and security features in place to keep Personal Information secure once received by SCPC.
- 7.4 The SCPC website may contain links to other websites. This Policy only applies to the abovementioned website and does not cover other services that SCPC links to. Accordingly, if you are transferred to another website via a link on the SCPC website, a Data Subject is cautioned to read the privacy policy to find out what it does with such persons information.

8 HOW AND WHY SCPC USE YOUR PERSONAL INFORMATION

We may use a Data Subject's Personal Information in the following ways –

- 8.1 **To provide services to the Data Subject and the general public** – such as delivering and managing the services and support SCPC provide, such as enabling education, offering learner development and support services, and legislative/regulatory reporting where required. This may include sharing your contact details with third parties who provide such services to the School.
- 8.2 **Contacting The Data Subject** – to respond to any enquiries or complaints the Data Subject might have and provide information regarding the service that a Data Subject may be receiving from SCPC.

8.3 **Training and staff management** – SCPC use Personal Information for staff training and upskilling personnel who may assist in delivering services to the Data Subject.

8.4 **Research and planning** – SCPC we use Personal Information to monitor the quality of SCPC services, conduct research and plan new services.

8.5 **Processing admissions** – SCPC support parents, caregivers/legal guardians and other representatives of learners with processing admissions to the School.

9 INFORMATION SHARING

9.1 a Data Subjects Personal Information may be shared internally within the School or externally with various third parties involved in delivering SCPC services or performing SCPC functions.

9.2 The following are examples of third parties whom SCPC may need to share a Data Subject's Personal Information with, if appropriate:

9.2.1 family, associates or representatives of the person whose Personal Information we are processing;

9.2.2 healthcare, social and welfare organisations;

9.2.3 educators and examining bodies;

9.2.4 financial organisations;

9.2.5 local and provincial government;

9.2.6 trade unions;

9.2.7 survey and research organisations;

9.2.8 photographer hired by the School;

9.2.9 students and pupils, including their relatives, guardians, carers or representatives; and

9.2.10 law enforcement authorities.

9.3 SCPC do not share Personal Information with third parties for marketing, sales or other commercial purposes without prior explicit consent from a Data Subject.

10 OUR LEGAL BASES FOR PROCESSING YOUR PERSONAL INFORMATION

For SCPC to be able to Process Personal Information, we need to demonstrate a lawful basis for doing so. The different legal bases SCPC rely on are –

10.1 **Consent – You, being the Data Subject** have told us you are happy for us to Process your Personal Information for a specific purpose(s). For example, when a parent provides us with Personal Information relating to their Child, they must provide us with the necessary permission to Process that information.

10.2 **Legitimate interests** - The Processing is necessary to fulfil SCPC's mandate and perform its functions, but not where a Data Subject's interests or rights reasonably override SCPC interests. For example, SCPC may require a Data Subjects identity, contact and financial information to manage payment of fees and charges to such person regarding SCPC services/delivery of education to a learner.

10.3 **Performance of a contract** - SCPC must Process Personal Information in order to be able to provide a service/s or fulfil a contract which SCPC have with the Data Subject or to which the Data Subject is a party.

Legal obligation - SCPC is required to Process Personal Information of a Data Subject by law.

11 DATA SECURITY

11.1 SCPC have appropriate security measures in place to prevent Personal Information from being accidentally lost, used, or accessed without authorisation. SCPC limit access to Personal Information to those who genuinely need to know. Those

Processing Personal Information will do so only in an authorised manner and are subject to a duty of confidentiality.

11.2 Emails that SCPC send to a Data Subject or that a Data Subject sends to SCPC may be retained as a record of contact, and the relevant email address of the Data Subject may be stored for future use in accordance with SCPC records retention practices in line with POPIA. If SCPC need to email sensitive or confidential information to a Data Subject, we will perform checks to verify the correctness of the email address and may take additional security measures.

11.3 SCPC will have procedures in place to deal with any suspected data security breach. We will notify The Data Subject and the Information Regulator of a suspected data security breach where we are legally required to do so.

12 **HOW LONG WILL WE KEEP PERSONAL INFORMATION OF A DATA SUBJECT FOR?**

12.1 SCPC will only retain Personal Information for the period for which it was initially needed unless we are required by law to do so or the Data Subject gives consent to SCPC retaining such information for a longer period.

12.2 SCPC may also retain Personal Information to the extent and duration that we have a legitimate interest in processing such Personal Information depending on, amongst others, the nature and lifespan of the services procured from SCPC.

12.3 Upon request from a Data Subject, SCPC will promptly return or destroy any Personal Information in our possession or control, save for that which we are legally obliged to retain.

13 **USE OF OPERATORS TO PROCESS INFORMATION**

13.1 When subcontractors or other third parties ("**operators**") are used to process Personal Information on behalf of SCPC, SCPC will enter into agreements that will protect Personal Information of a Data Subject in line with the law. At the very least, our agreements with operators will ensure that we address the following issues –

13.1.1 the **lawful purpose** for which Personal Information is being collected;

- 13.1.2 the **limit of processing** and prohibition of further processing;
 - 13.1.3 the **extent of information** that is required to prevent any excessive information collection;
 - 13.1.4 the **information retention periods** and requirements applicable together with destruction processes and procedures;
 - 13.1.5 the **right of individuals to request** such information and query the use thereof; and
 - 13.1.6 the **security measures** required to prevent the unauthorised or unlawful processing of personal information or access to personal information, including accidental loss, destruction or damage to personal information.
- 13.2 Some of the operators we may engage from time to time include –
- 13.2.1 training service providers; and
 - 13.2.2 psychosocial service providers (i.e., learner wellness support).

14 DIRECT MARKETING

- 14.1 SCPC conducts direct marketing, but only in instances where the Data Subjects' contact details have been obtained to provide a service to them (e.g., school education-related services).
- 14.2 Further, Data Subjects are allowed to opt out of direct marketing through a link in any direct marketing communication sent to them by SCPC. Alternatively, the Data Subject can send an email for the attention of SCPC's Information Officer at info@steyncityschool.co.za, requesting that they be removed from the marketing communications.

15 CROSS BORDER INFORMATION FLOWS

- 15.1 Although SCPC currently does not engage in cross-border information flows (i.e., transferring Personal Information to third parties outside of South Africa), it recognises that there are restrictions on the cross-border transfer of Personal Information. Accordingly, SCPC remains cognisant of the applicable restrictions, which depend on, *inter alia*, the laws of the country to which the Personal Information is transferred and the Data Subject's consent. Where such transfer is necessary for the performance of a contract that SCPC has concluded with the Data Subject, the terms of such contract will address legal requirements required for cross-border information flows.
- 15.2 Consequently, SCPC will ensure that where applicable, Personal Information is only transferred to foreign countries in limited instances, such as where the -
- 15.2.1 third party recipient country has the same or better data privacy protections as South Africa;
- 15.2.2 data subject has given consent; or
- 15.2.3 transfer is required for the performance of a contract concluded with the Data Subject.

16 RIGHTS OF A DATA SUBJECT

- 16.1 A Data Subject has a number of rights under POPIA which, in certain circumstances, you may be able to exercise in relation to the Personal Information that SCPC process.
- 16.2 These include –
- 16.2.1 request the School to confirm, free of charge, whether or not the School holds certain Personal Information about the Data Subject;
- 16.2.2 access a copy or record of the Personal Information the School holds about you as a Data Subject, including information about the identity of all third

parties, or categories of third parties, who have or have had access to the information;

- 16.2.3 correction of inaccurate Personal Information the School holds about you as a Data Subject;
 - 16.2.4 restrict the School's use of your personal information as a Data Subject;
 - 16.2.5 ask the School to destroy or delete the information it holds about you;
 - 16.2.6 object to the School's use of your personal information; and are subject to the School's reasons and legal bases for using your personal information.
- 16.3 Where SCPC rely on Consent as the legal basis for Processing your Personal Information, you as a Data Subject may withdraw that consent at any time.
- 16.4 SCPC will always seek to comply with your request; however, we may be required to hold or use your Personal Information to comply with legal duties. Please note that your request may delay or prevent us from delivering a service. Further, you may not have the right to object to us using your Personal Information for statistical purposes where it is necessary to perform a public task in the public interest.
- 16.5 If you, as a Data Subject have any questions about this Policy, how SCPC handle your Personal Information or wish to exercise any of your rights in terms of POPIA, then please get in touch with us at –

Address: C/O Douw Steyn and Cedar Drive, Riverside View

Email: info@steyncityschool.co.za

Telephone number: 0105971250

- 16.6 Further, please refer to Steyn City's PAIA Manual for further information on exercising your rights.

17 CONSEQUENCES OF NON-COMPLIANCE

- 17.1 Any contravention(s) of this Policy may result in disciplinary action being instituted against an employee of SCPC, which action may include dismissal or termination of employment and any other legal action that may be available to SSCPC.
- 17.2 SCPC also reserves the right to exercise any appropriate form of legal action against any party which may cause us harm and/or damages by non-compliance with this Policy.

18 INFORMATION REGULATORS OF SOUTH AFRICA

The Regulator is an independent body empowered to monitor and enforce compliance with the provisions of POPIA by public and private bodies. The Regulator can be reached at –

- 18.1 JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Website: <https://www.inforegulator.org.za/>

General Enquiries: enquiries@inforegulator.org.za

Complaints: PAIAComplaints@inforegulator.org.za
POPIAComplaints@inforegulator.org.za

19 POLICY REVISION

- 19.1 This Policy is subject to review and amendment without prior notice. Any review and update hereof will take into account new laws, regulations, and technological developments that may affect SCPC's Processing of Personal Information.
- 19.2 SCPC undertakes to ensure that any amendments hereto are communicated on our publicly available platforms, such as our website, for the benefit of the general public whom we serve and any other persons who may be affected by this Policy.

20 **VERSION CONTROL**

Last updated **July 2024**.

ANNEXURE A – DEFINED TERMS

Term	Definition
Child	<p>A natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself.</p> <p>A "competent person" means any person who is legally competent to consent to any action or decision being taken concerning a child (e.g., the parent or legal guardian).</p>
Consent	<p>Any voluntary, specific and informed expression of will in which permission is given for processing personal information.</p>
Data Subject	<p>The person to whom the personal information relates. This includes both natural and juristic persons who can be identified, directly or indirectly, by reference to the personal information concerned.</p>
Personal Information	<p>Information about an identifiable living, natural person, and in so far as is applicable, an identifiable, existing juristic person (e.g., company), including –</p> <ul style="list-style-type: none"> • information relating to 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 the birth of the person; • information relating to the education or the medical, financial, criminal or employment history of the person; • any identifying number, symbol, email address, physical address, telephone number or other particular assigned to the person; • the biometric information of the person; • the personal opinions, views, or preferences of the person;

Term	Definition
	<ul style="list-style-type: none"> • 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; • the views or opinions of another individual about the person; and • the name of the person where it appears with other personal information relating to the person or where the disclosure of the name itself would reveal information about the person.
Processing	<p>Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including –</p> <ul style="list-style-type: none"> • the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; • dissemination by means of transmission, distribution, or making available in any other form; or • merging, linking, as well as restriction, degradation, erasure or destruction of information. <p>"Process" has a similar meaning.</p>
Record	<p>Any recorded information, regardless of form or medium, including any of the following –</p> <ul style="list-style-type: none"> • writing on any material; • information produced, recorded or stored by means of any tape recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored; • label, marking or other writing that identifies or describes anything of which it forms part or to which it is attached by any means; • book, map, plan, graph or drawing; • photograph, film, negative, tape or other device in which one or more visual images are embodied to be capable, with or without the aid of some other equipment, of being reproduced

Term	Definition
	in the possession or under the control of a responsible party whether or not a responsible party created it, and regardless of when it came into existence.
Regulator	The Information Regulator of South Africa was established in terms of section 39 of POPIA.
Responsible Party	A public or private body or any other person who, alone or in conjunction with others, determines the purpose of and means for processing personal information.
Special Personal Information	<p>Information concerning –</p> <ul style="list-style-type: none"> • the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or • the criminal behaviour of a data subject to the extent that such information relates to— <ul style="list-style-type: none"> the alleged commission by a data subject of any offence, any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.
Technical and Organisational Measures	Technical and organisational measures are those security measures aimed at protecting personal information against accidental or unlawful destruction or accidental loss, alteration, authorised access to or disclosure of personal information, where the processing involves transmitting personal information over a network and against all other unlawful forms of processing.



STEYN CITY
SCHOOL
WE REACH BEYOND

RESPECT | SERVICE | INTEGRITY | CURIOSITY | COURAGE

ANNEXURE B
MINOR CHILD CONSENT FORM | POPIA 2024

Informed Consent Statement

All Personal Information which you provide to the Steyn City School will only be used for the purposes set out in our POPIA policy.

I, _____ with ID Number: _____, am the parent/guardian of _____, I consent to providing my child Personal Information to the Steyn City School, on the understanding that the Steyn City School will process my child personal information in accordance with the conditions for the lawful processing of personal information set out in POPIA.

I hereby permit Steyn City School to process my child's Personal Information, as provided above and in the Steyn City POPIA Policy and acknowledge that I understand the purposes for which it is required.

I declare that my child's personal information supplied to Steyn City School is accurate, up to date, not misleading and that it is complete in all respects and will be held and/ or stored securely for the purpose for which it was collected and that I will immediately communicate with Steyn City School of any changes to my Personal Information should any of these details change.

I also understand that I have the right to request that my child's personal information be corrected or deleted, if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully or that the personal information or record be destroyed or deleted.

Parent/Guardian Signature

Signature Date



STEYN CITY
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WE REACH BEYOND

RESPECT | SERVICE | INTEGRITY | CURIOSITY | COURAGE

ANNEXURE C
PARENT CONSENT FORM | POPIA 2024

Informed Consent Statement

All Personal Information which you provide to the Steyn City School will only be used for the purposes set out in our POPIA policy.

I, _____ with ID Number: _____, I consent to providing my Personal Information to the Steyn City School, on the understanding that the Steyn City School will process my personal information in accordance with the conditions for the lawful processing of personal information set out in POPIA.

I hereby permit Steyn City School to process my Personal Information, as provided above and in the Steyn City POPIA Policy and acknowledge that I understand the purposes for which it is required.

I declare that my personal information supplied to Steyn City School is accurate, up to date, not misleading and that it is complete in all respects and will be held and/ or stored securely for the purpose for which it was collected and that I will immediately communicate with Steyn City School of any changes to my Personal Information should any of these details change.

I also understand that I have the right to request that my personal information be corrected or deleted, if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully or that the personal information or record be destroyed or deleted.

Parent Signature

Signature Date