



## SPRINGFIELD CONVENT SCHOOL

### PRIVACY NOTICE

#### Introduction

This privacy notice has been adopted as part of the School's Personal Information Protection Compliance Framework. Please refer to Part A of the framework for background and definitions used in this notice.

During your interactions with us, it may happen that we need to process some information about you which may constitute personal information for purposes of POPIA, which may include accessing it, storing it, merging it with other information, deleting or destroying it, and possibly sharing it with third parties.

In terms of s18 of POPIA we are required to bring to your attention certain matters relating your personal information, which we set out in this notice document. **By interacting with the School and providing your personal information to us, you acknowledge that you have read and understood this notice and have agreed to the contents hereof. You furthermore authorize us to take any of the actions described herein insofar as your personal information is concerned.**

#### Information that we process

We process various types of information relating to various data subjects, which will differ depending on your relationship with the School.

Please refer to **Schedule 1** of this notice for a breakdown of the personal information commonly processed by the School in relation to different types of data subjects.

#### How we process it

We process personal information by way of digital and physical means. Certain information is processed only by digital means – especially if it was provided to us only in digital format – and is subject to the safeguards contained in our ICT Security Policy. Other information, such as admissions applications, employment applications, contractual documents, academic and employment histories, etc., are usually captured manually by way of standard application forms. These records are kept in physical format and

secured physically, in accordance with the Physical Information Security Policy. Such information is also captured digitally and stored on our digital infrastructure in accordance with the provisions of our ICT Security Policy.

### **Reasons for processing personal information and consequences of not doing so**

The proper functioning of the School as an educational institution requires us to process certain personal information. This could be for any of the following reasons:

- To provide educational services to our pupils and their parents, which includes the day-to-day activities of running a school and all interactions with pupils and their parents in this context. This could, for example, include interactions relating to academic learning, childhood development, sport, music, cultural and extra mural activities, school fees and school news and events.
- To facilitate applications for future admissions to the School.
- To provide employment to our staff and to interact with them in the context of the employment relationship.
- To prepare and submit legally required educational data to the government.
- To facilitate internal communications and interaction between parents, pupils, staff, and management.
- To market the School's services to the broader community within which it operates.
- To procure services and manage relationships with service providers.
- To allow controlled access to School premises to ensure the safety of our pupils and staff.
- Any other reason which is integral to our functioning properly as an educational institution.

**If requested personal information is not provided to us, we may not be able to properly fulfil the above-mentioned functions, which may result in the relevant interaction being interrupted, or the School not engaging in such interaction at all, in the sole discretion of the School. We accept no responsibility for any such interruptions if personal information was requested by us but not provided.**

Lastly, as an independent school, we are subject to a number of laws, regulations, rules, and policies which may require us to process certain personal information. This includes:

- The South African Schools Act 84 of 1996 and the regulations thereto.
- The rules, policies, and procedures of the South African Council for Educators.
- The constitution, rules, and policies of the Independent Schools Association of South Africa.
- The rules and policies of the Catholic Institute of Education.

### **Where we may obtain your personal information from**

In most cases, we will request your personal information directly from you. However, in some cases we may need to obtain it from third parties. This will be the case if you have authorized us to do so, or where the nature of our interaction with you reasonably requires us to do so. We may also be legally required to independently verify some of the information provided to us in terms of applicable anti-terrorism and anti-money laundering legislation (including, but not limited to, the Financial Intelligence Centre Act 38 of 2001, as amended), which may include our accessing government or public directories in order to obtain certain personal information about you.

In some cases, especially if you are an organisation, we may need to obtain personal information relating to third parties (such as your office bearers or employees) from you. You hereby warrant that you have the express and informed consent of such third parties to provide us with any such information and indemnify us against any liability to such third parties, or any other party, as a result of a lack of such authorization.

If you are a parent or legal guardian of a pupil, prospective pupil or alumnus who is younger than 18, you hereby consent to our processing the personal information of your children for the reasons set out above.

Where we need to process information classified as “special” personal information (e.g. medical information) for any of the reasons specified above, you hereby consent to our processing of such special personal information.

### **Sharing of your personal information with third parties**

We may need to share your personal information with third parties. In general, this is limited to transmitting or storing such information through, or on, electronic communication and storage infrastructure administered by third party service providers, which is subject to reasonable security safeguards. However, depending on the nature of our interaction with you, we may need to share some of your personal information with other third parties. This is especially the case where we are legally required to provide information to government in accordance with its EMIS (Education Management Information Systems) requirements.

## **Information leaving the country**

We may need to transmit your personal information to a location outside of the country, where it may be processed by third parties. This may, for example, happen while we are communicating with you while you are not in the country. It may also happen where our backup infrastructure is in or administered from another country. In such cases, the transmission and processing of such information is subject to the provisions of s72 of POPIA, meaning that the third party to which we may transmit your information will either be subject to laws, or a contract with us, or corporate binding rules, which requires them to employ the same reasonable safeguards in respect of your personal information that we are required to comply with in terms of POPIA.

## **Retention of your personal information**

In general, we only retain your personal information for the duration of our interactions with you and for a reasonable period thereafter, to facilitate further similar interactions. We are, however, in some cases legally required to keep certain information for specific periods of time, which usually does not exceed a period of 5 years, subject to the advice of the School's auditors. Please refer to **Schedule 2** of this policy for instances where specific retention periods apply.

Information that we retain for marketing or statistical purposes may be retained indefinitely, provided that you have authorised us to use the information for marketing purposes or, in the case of use for statistical purposes, that the information has been anonymized.

## **Information Security**

As required by s19 of POPIA, the confidentiality and integrity of any personal information processed by us is subject to reasonable technical and organisational safeguards to prevent loss, damage, destruction or unauthorised access, having due regard to generally accepted information security practices and procedures. For more information on some of these safeguards, please refer to our Physical Information Security and ICT Security Policies.

**We are not liable to you, or any other person, for any harm, loss, damage, destruction, or unauthorized access that may occur despite our implementation of such reasonable safeguards.**

## **Your rights**

In terms of sections 23 and 24 of POPIA, you have the right to access, and to request us to correct, any personal information retained by us, subject to the provisions of those sections. Please refer to the School's PAIA manual, for more information on the process to follow in this regard.

You furthermore have the right, in terms of section 11(3) of POPIA, to object to our holding of your personal information. Please refer to the School's PAIA manual, for more information on the process to follow in this regard.

Should you wish to lodge a complaint, you may contact the office of the Information Regulator, whose contact details are contained in Part A of the Personal Information Protection Policy Framework.