



## 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 POPI, 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 POPI 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 in order 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 located in, or administered from another country. In such cases, the transmission and processing of such information is subject to the provisions of s72 of POPI, 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 POPI.

### **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, in order 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 anonymised.

## Information Security

As required by s19 of POPI, 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 POPI, 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 POPI, 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.

## SCHEDULE 1 – TYPES OF PERSONAL INFORMATION PROCESSED BY THE SCHOOL

### 1.1 Information relating to prospective pupils

Information type	Why we process it
Identifying and age information, e.g. name, surname, ID number, date of birth	To identify the pupil and establish their age for capacity purposes.
Contact information of prospective pupil	To contact the pupil about their application, if necessary.
Contact information of present school, if any	To contact their present school in order to obtain academic history.
Names and contact information of references	To contact references as part of standard application process.
Language	To establish the applicant's language requirements and proficiency, with reference to the School's medium of instruction (English).
Religious information	As a school with a Catholic ethos, we need to establish prospective pupils' religious affiliations as part of the admission process.

### 1.2 Information relating to parents and guardians of prospective pupils

Information type	Why we process it
Identifying information, e.g. name, surname, ID number	To identify the parent / guardian.
Personal contact information	To contact the parent / guardian about their application, if necessary. Also for billing purposes.
Business contact information	To follow up on payments, such as deposits, if the parent or guardian is not reachable on their personal contact information.
Information pertaining to parent / guardian's own history at the School, if any, as well as the	Past enrolment by family members is a factor in the admission decision.

names of other family members who attended the School in the past

Marital status

To establish facts about the prospective pupil's circumstances at home. Also for billing purposes.

Occupation

Part of affordability assessment in relation to fees.

### 1.3 Information relating to junior school pupils

#### Information type

#### Why we process it

All information contained in admission application form

To have a complete student record of the pupil while they attend the School and to render educational services to them.

Educational information

To keep a record of the pupil's educational career and development at the School.

Health information

To keep a record of standard screening tests as well as any developmental matters relating to the pupil.

EMIS information, which includes inclusion status, nationality, immigration status, preferred language, race, social grant status, province, boarding status

We are legally required to report this to government.

Images and video

Used in School photos, newsletters and marketing material, such as the website. May also be used as part of physical security protocols.

### 1.4 Information relating to senior school pupils

#### Information type

#### Why we process it

Same as junior school pupils

See 1.3 above.

Junior school academic records and senior school entrance exam results

To have an accurate record of the pupil's academic and development history.

## 1.5 Information relating to parents or guardians of enrolled pupils

Information type	Why we process it
Everything on admission form	See 1.2
Link to child's records	To contact the parent / guardian about their child if necessary.
Images and video	Used in School photos, newsletters and marketing material, such as the website. May also be used as part of physical security protocols.

## 1.6 Information relating to staff

Information type	Why we process it
Identifying information, e.g. name, surname, ID number	To identify the member of staff.
Personal contact information	To contact the member of staff.
Employment history and qualifications, including SACE registration (teaching staff)	To establish eligibility for a relevant position, track career and disciplinary matters, etc.
Financial information	Required to remunerate staff and to report payroll information, pay relevant taxes, etc., to the relevant authorities.
Contract of employment	To record the legal parameters of the employment relationship.
Medical information	To use in case of emergency and to account for any medical aid contributions paid by the School.
Next of kin contact details	To notify next of kin in emergencies.
Information about spouse, if dependent on school medical aid.	To account for any medical aid contributions paid by the School.

Religion	As a school with a Catholic ethos we need to establish staff members' religious affiliation.
Images and video	Used in School photos, newsletters and marketing material, such as the website. May also be used as part of physical security protocols.
Biometric information	To provide to SAPS for police clearance. Required in terms of the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007.
Criminal history	Required in terms of the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007.

#### **1.7 Information relating to temporary staff and invigilators**

<b>Information type</b>	<b>Why we process it</b>
Same as for permanent staff, excluding medical aid information.	See 1.6 above.

#### **1.8 Information relating to coaching staff**

<b>Information type</b>	<b>Why we process it</b>
Same as temporary staff and invigilators, less emergency contact details.	See 1.6 and 1.7 above.

#### **1.9 Information relating to board members**

<b>Information type</b>	<b>Why we process it</b>
Identifying information, e.g. name, surname, ID number	To identify the member of the board.
Contact information	To contact the member of the board.

Role	To record the board member's role within the School.
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#### 1.10 Information relating to PTA committee members

Information type	Why we process it
Same as board members	See 1.9 above.

#### 1.11 Information relating to visitors

Information type	Why we process it
Name	To control access to the premises for the safety and security of pupils, staff, management, parents and other visitors and to secure School property.
Contact number	Same as above.
Vehicle registration number	Same as above.
Times visited	Same as above.
Reason for visit	Same as above.

#### 1.12 Information potentially relating to anyone on School premises

Information type	Why we process it
Video surveillance footage from CCTV cameras	See 1.11 above.

**1.13 Information relating to service providers****Information type**

Identity information of service provider or their key personnel

**Why we process it**

To identify the service provider.

Contact information of service provider or their key personnel

To contact the service provider.

## **SCHEDULE 2 – SPECIFIC RETENTION PERIODS IN RESPECT OF CERTAIN INFORMATION**

<b>Information type</b>	<b>Retention period</b>
Admission applications	From application date, to the date that a decision is made, or the application is withdrawn and then archived for a maximum of 5 years. If the application is granted, the application documents become part of the pupil's school record and are subject to the retention policy in respect of such records.
School record of pupils (including parent information)	From date of admission for duration of enrolment at the School and archived for a maximum of 5 years thereafter (other than EMIS data which is no longer within the School's control and is subject to government's policies and procedures).
Staff records	For duration of employment and up to a maximum of 5 years thereafter.
Other records generally	Maximum of 5 years unless advised otherwise by the School's auditors.