



PRIVACY STATEMENT

In accordance with the Protection of Information Act No.4 of 2013 ('Act')

St Anne's Diocesan College is committed to protecting your privacy in accordance with the requirements as prescribed in the Protection of Personal Information Act No.4 of 2013 (POPIA). Our Privacy Statement is designed to create an environment of transparency and honesty. The standards set out in the Act require companies and institutions to protect personal information obtained for their administrative processes and regulates the collection, handling, retention, dissemination and disposal of such information.

This statement aims to clarify our approach to the use of your **Personal Information (PI)**.

What is Personal Information (PI)?

Below is the definition of Personal Information (PI) as stated in the POPI Act:

*"... **personal information** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:*

- 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, or online identifier;*
- 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, their behaviour and conduct; and*
- h. the name of the person if it appears with other PI relating to the person or if the disclosure of the name itself would reveal information about the person; ..."*

8 Principles of Collection

- **Accountability:** The College must assign responsibility for overseeing and managing compliance with POPIA.
- **Processing limitation:** PI may only be processed in a fair and lawful manner and only with the consent of the person.
- **Purpose specification:** PI may only be processed for specific, explicitly defined and legitimate reasons. A person has the right to know what information the College has, the purpose for which it was gathered, and a date on which that information must be destroyed, in a manner that prevents its reconstruction.
- **Further processing limitation:** The College should only use PI for the reasons specified. Additional consent must be obtained for any further processing.
- **Information quality:** the College must take steps to ensure that the PI is complete, accurate and updated where necessary.
- **Openness:** The person whose information is being collected must be aware that this is the case, and the purpose for which the information will be used.
- **Security safeguards:** PI must be kept secure against the risk of loss, unlawful access, interference, modification, unauthorized destruction and disclosure.
- **Data subject participation:** A person may enquire whether their PI is held, as well as request the correction and/or deletion of any PI held about them.

What Personal Information Do We Collect?

PI that is deemed essential to meet and further the aims, relationships and operations of St Anne's Diocesan College, will be collected with consent, verbally, in writing, or electronically. This information is collected from, but is not limited to:

- interested and prospective parents and pupils and applicants for employment
- current pupils
- past pupils, the alumni
- staff members, present and past
- parents, present and past
- governors, present and past
- contractors, outside coaches, academic support personnel
- donors and benefactors
- persons and organisations associated with the Stepp Programme.

The PI is collected, processed and stored in accordance with the requirements as prescribed in the Protection of Personal Information Act No. 4 of 2013 (POPIA).

Personal Information of the following types may be collected:

- names, telephone numbers, email addresses, addresses, and other contact details
- family details
- safeguarding information (such as court orders and professional involvement)
- education and employment data
- images, audio and video recordings, including CCTV footage and live streaming of events
- financial information
- schools previously attended.

Other types of information we may collect for the school's purposes are related to an individual's health, criminal record and other sensitive information, such as:

- information about health status or provision of health care linked to a specific individual
- behavioural information
- special educational needs
- criminal records and police clearance records linked to a specific individual
- biometric information
- gender
- ethnicity
- religion
- nationality, IDs and location.

Types of information we collect off our network, websites, apps and portals

- Details such as geolocation, web browsing history, personal device location, connection history, hardware address and IP address (which is a unique identifier for your computer), are collected for devices connecting and using the college Wi-Fi, physical network and internet.
- We receive and store certain types of usage information whenever you interact with the Edana Parent app or Parent Web portal; this information is not PI. For example, when you download our Mobile Application, we automatically collect information on the type of device, name, and version of the operating system, name and version of the application, the numerical mobile device user ID, as well as actions performed by the user in accessing the Mobile Application. However, we do not ask you for access or track any geographic-location-based information from your mobile device (i.e., any information regarding where your mobile device is located on the globe at a particular time) at any time while downloading or using our Mobile Applications.
- We may use cookies or other tracking technologies to collect information such as the pages you visit or the information you request. The Website hosting agents and/or service providers may automatically log your "IP address" and/or other access device. Such information collected is for aggregate purposes only.

How Do We Collect Personal Data?

The following methods are the primary ways in which we collect information:

- personally and over the telephone
- through our webpage, including information received through the following sections: Contact Us, Join Us, Giving Back, Old Girls, Shop and the Parent Portal
- user-generated content, posts and other content you submit to our website and social media platforms
- from email and hand delivered paper documentation: including job applications, testimonials, emails, invoices, letters, RSVPs, trip and transport forms, and consent forms
- through online tools: such as apps, educational platforms and other software used by our staff
- video footage through any CCTV cameras located at our premises; live streaming or recorded footage of events
- through third parties, such as referees, outside sport coaches, academic professionals, previous institutions or authorities working with the individual.

Why do we collect your Personal Information?

St Anne's Diocesan College processes personal information to legitimately and lawfully carry out the school's educational activity.

- Parent/guardian and learner information is processed for the following purposes: to ensure compliance with the school's admission criteria
- to provide educational services including the support of pupil learning, monitoring and reporting on pupil progress
- recording and updating education department educational management systems
- applications relating to special learner support and accommodations, accreditations and certificates
- completing educational statistics and surveys (unique identifiers are removed)
- applications for, and enrolment in, school related olympiads and competitions
- to provide for students' welfare and pastoral care services
- to provide for students' medical attention, catering and school transportation, school-organised trips, and other necessary services
- to maintain parent/guardian contact details for learner progress updates, emergencies, notifications regarding school activities, sharing newsletters, etc.
- storing/saving College milestones and achievements, including videos and photographs, etc. for historical collection, annual yearbook publications, social media platforms and website upgrades
- biometrics for access control and attendance
- to comply with the law regarding data sharing
- to comply with legislative or administrative requirements
- to administer the school's Board governing body
- to enable parents/guardians to be contacted in the case of emergency, or in the case of school closure, or to inform parents of their child's educational progress, or about school events, trips etc.

St Anne's also collects information about staff and prospective staff when necessary for:

- facilitating the job application selection process in determining the suitability of the candidate
- recruitment of staff
- administration of staff records and human resource records
- administration of payroll, medical aid details, pensions, and sick leave
- staff appraisal
- disciplinary procedures
- biometrics for access control
- recording and updating education department educational management systems
- completing educational statistics and surveys (unique identifiers are removed)
- training and development.

Parent/guardian consent is required for all information pertaining to a learner. Any identifiable information regarding a person under the age of 18 years is considered Special PI.

It is specifically noted that as an educational institution, PI is key to the activities of the College, in accordance with Part C of the Act.

In addition, the maintenance of an alumni database is common practice in educational institutions meaning that the College will retain certain PI on an on-going, indefinite basis to meet alumni record purposes. Website usage information may be collected.

In maintaining and retaining PI, the College shall have reference to:

- the retention of records in accordance with the law
- the period for which the college requires the pi in order to carry out its activities including alumni relationship management
- de-identify or destroy/delete pi records in a responsible manner that precludes reconstruction once it has no further use for them. where possible a certificate of destruction of records will be obtained.

If you would like to know what information we keep on record, or you would like to check the authenticity of this information please email ogg@stannes.co.za.

Information is processed for the purposes of, not limited to, performing business activities such as buying, services or installation bookings, deliveries, payments and marketing.

The processing of information is not used for any other purpose other than for the purpose for which it was specifically collected without the written permission and consent of the data subject.

Will We Share Any Of The Personal Information Received?

St Anne's may be lawfully required to share PI with relevant authorities or third parties as permitted on statutory grounds, to comply with legal obligations or on the basis of a specific consent given by the individual concerned. We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when disclosing your personal data to a third party. ***Your personal data will not be rented nor sold to third parties.***

Retention Of Personal Information

PI will only be retained for the period required to fulfil the purpose for which it was collected, or if required for a longer time for public interest archiving, scientific or historical research, statistical or alumni purposes. Once the PI is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous. Accounts, including email and Office 365 data, will be disabled once the person leaves the college and deleted 3 months thereafter.

Information Security

Condition 7 of the Act sets out the principles for the security and safeguarding of PI. St Anne's Diocesan College's obligations include:

- Minimising the number of electronic databases where PI is stored
- Limiting and consolidating where practical the number of hard-copy records
- Restricting access to hard-copy records
- Instituting and maintaining a variety of electronic safeguards which include:
 - Firewalls and secured Vlans
 - Password protection
 - Data encryption where appropriate and practical
- Securely shredding hard-copy data either internally or via a reputable third-party provider who will provide a certificate of safe destruction
- Denaturing, de-identifying and deleting and prevention from reconstruction of electronic records
- Employing physical barriers such as locks, access control mechanisms and security cameras
- Regard all PI as confidential in nature and take all reasonable steps to prevent inappropriate disclosure whether accidentally or via unauthorised access.

Your Responsibilities

You can help protect against unauthorised access to your account and PI by implementing the following guidelines:

- use passwords that are not easily guessed, longer than 7 characters, and include a combination of capitals, numbers and special characters
- appropriately limiting access to your computer and browser by signing off after you have finished accessing your account, as well as limiting access to your phone or the personal device you use to access the Parent App.

We endeavour to keep your information private; however, we cannot guarantee security. Unauthorised entry or use, hardware or software failure, and other factors may compromise the security of user information. Where grounds for reasonable suspicion that a breach of security has occurred, St Anne's Diocesan College will be guided by Section 22 of the Act in notifying all specified persons and/or organisation.

Your Rights

You have the right to:

- have their PI processed lawfully and should be informed of the purpose for which the information is being collected
- establish what information the College holds and request the correction of the PI where necessary
- be informed if their information has been accessed/acquired by an unauthorised person
- obtain data portability of your PI in a structured, commonly used and machine-readable format. This allows the right to transmit that data to another controller without hindrance from the controller to which the personal data has been provided.

The College strives to safeguard the PI in its possession through policies and procedures and technical measures that have been put in place. It remains the objective of the College to identify all reasonably foreseeable internal and external risks and to continuously verify the effectiveness of those measures against new risks that may arise.

Whilst it is your right to withdraw consent to our processing of your PI, we draw your attention to the fact that such withdrawal may have unintended consequences relating to your contractual or other relationship with the College.

Integrity of Personal Information

As we are required to ensure that the PI we hold is accurate, we require that you regularly update us, in writing, of any changes to your PI so that we may amend our records accordingly. In providing us with changes, we will need your request in writing to authenticate the change(s).

Trans-Border Information Flows

The College will be guided by Chapter 9 of the Act, however, it is recorded that the following types of activity give rise to trans-border information flows in accordance with the specified purpose of the organisation.

These include but are not limited to:

- Pupils who are enrolled but who are normally resident outside South Africa
- Alumni who are normally resident outside South Africa
- The intention of pupils to enrol at educational institutions outside South Africa and where the provision of PI is necessary to facilitate enrolment
- Pupils applying for Exchange, President Award travel or any College trip outside South Africa.

Privacy Queries

If you would like to discuss anything regarding this privacy statement, or have any queries relating to POPIA you can email mist@stannes.co.za

Should you believe we are processing your personal data with disregard to the data protection regulations in force, any claim can be sent to the Information Regulator who can be contacted below:

Telephone number: +27 (0) 10 023 5200

Cell No: +27 (0) 82 746 4173

Email: complaints.IR@justice.gov.za or infoereg@justice.gov.za

Privacy Statement Updates

The College may need to update this privacy notice periodically. Please review this information frequently.

Last updated: August 2021

Further reading:

<https://popia.co.za/>

<https://www.popiact-compliance.co.za/>

<https://www.ed-admin.com/mobileapp/privacy/>