



Summary of Privacy Policy

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Table of Contents

- A) Introduction:
- B) Who We Are:
- C) About Our Privacy Policy:
- D) Types of information we collect:
- E) What information we know about you:
- F) About cookies:
- G) What is a cookie?
- H) Our Cookie Policy is as follows and how we use the information we collect:
- I) The difference between Personal Information and Aggregate Information:



Summary of Privacy Policy

A) Introduction:

This Privacy Policy applies to your use of the Eduplex website and other platforms and applies to us, all visitors, users and customers of these platforms.

Our Privacy Policy's primary point of commencement is section 14 of the Constitution of the Republic of South Africa, 1996, that provides that everyone has the right to privacy. Our Protection of Personal Information Act, No 4 of 2013, POPIA, legislation is the vehicle that that this policy follows.

B) Who We Are:

Eduplex is an international model for inclusive education with a journey of learning and discovery for children.

Eduplex is an international model for inclusive education with a journey of learning and discovery for children.

- Independent, Christian Private school with a Biblical world view,
- Parallel medium (Separate English and Afrikaans classes),
- Specially designed, acoustically treated classrooms,
- Excellent learning environment with interactive gardens,
- High academic standards with international assessments (IEB),
- Good balance between academics, sport and culture,
- Maximum use of world-class technology, with a
- High staff-to-pupil ratio.

C) About Our Privacy Policy:

When you access this website and use our platform, information is created on our side.

Because we know your privacy is important, we have created this Privacy Policy to explain how we collect, use and protect that information.



We will always respect the privacy of all user information and we do not circulate any details provided to us in the public domain.

We take appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data.

These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorised access to systems where we store personal data.

We restrict access to personal information to our staff, contractors and agents who need to know that information to carry out, develop and improve our operations. Our people are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

This Privacy Policy may change from time to time and the changes will be posted on our Website.

We will not reduce your rights under this Privacy Policy without your consent.

Eduplex will post any Privacy Policy changes on this page and significant changes will be brought to your attention.

We have provided an easy-to-understand Privacy Policy Summary below to address some common concerns.

D) Types of information we collect:

- User provided: Contact information (name, email, phone number, job title, payment information, and other info provided by you), to access our platform and use and pay for our services.
- Automatically collected: IP Address, user agent, and the referring URL. When you visit our website, we automatically receive your IP address and information such as the user-agent of your web browser. This information is provided to us and every other website that you visit on the Internet by your web browser.



E) What information we know about you:

We do not request or require you to provide personal information just to access our website. As noted above, we receive your IP address and user agent automatically.

Information we also collect from you are:

- Name of Learner, Parents, Doctor, Contact.
- Address: Learner and parents
- email address: Work and home
- telephone/cell number of Learner, Parents, Doctor, Contact.
- Id Number of Learner, Parents
- Parents Marriage status
- Medical aid and number
- Medical history
- Parents income if in need of financial support

F) About cookies:

The Eduplex website and platform may place cookies on your browser to identify you when you return to our website or log in to our platform.

G) What is a cookie?

Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

H) Our Cookie Policy is as follows and how we use the information we collect:

- We use aggregate information to understand how many total users have visited our web site and the types of devices on which they are using it.
- We use information you choose to provide in our website to sell our services.



- We only use the specific information you provide to us for effectively provide what you request and to correspond with you.
- We do not sell any of the information collected from you to any third parties.
- We may share data with our vendors and service providers to perform tasks on our behalf.

I) The difference between Personal Information and Aggregate Information:

Personal Information is information that can be used to identify a particular individual, generally understood to be information such as your name, physical address, email address and phone number.

Aggregate Information is not considered personal information and cannot be used to identify you.

We do not “amass” email addresses.

We do not require you to submit your email address, or any other personal information, to us to use this Eduplex web site.

If you use the information provided on this website to contact us directly, we will receive your contact information, but will only use it to respond to your specific inquiry.

If you fill out a web form on our web site, we receive your email and may store that email and associated contact information for up to 12 months.

For more detailed information, please continue reading the topics below to visit sections of our full Privacy Policy:



Full Privacy Policy of Eduplex

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Table of Contents

- 1). Introduction
- 2). What Information We Collect and How We Collect It
- 3). How We Use the Information We Collect
- 4). Cookies
- 5). With Whom We Share Information
- 6). Security
- 7). Encryption
- 8). Physical Security
- 9). Access Control
- 10). Staff and other Employees
- 11). Vulnerability Management
- 12). Incident Management
- 13). Data Retention
- 14). Data Storage & Data Transfer
- 15). Children's Privacy
- 16). "Do Not Track"
- 17). Your Rights
- 18). POPIA, GDPR, EU-US & Swiss-US Privacy Shield
- 19). How to Contact Us



Full Privacy Policy of Eduplex

1). Introduction

This Privacy Policy covers how Eduplex collects, uses, discloses and stores information about you when you use our website or platform.

2). What Information We Collect and How We Collect It

To provide our services to you and to ensure that our software and platform operate correctly, we collect various types of information, including information that identifies you or may identify you as an individual (“Personal Information”). When you use our website, or sign in to communicate, and use our software or platform, we collect the following information:

2.1 Information you provide to us:

If you use the contact information provided on our website to contact us directly and inquire or instruct us, you agree to allow Eduplex to store and process your contact information. We will receive your contact information which could include, depending on how you contact us, your email address, name, company name, job title, the reason for contacting, and postal address.

2.2 We receive and store the information you provide to us when you directly sign into and use our services and platform. The types of information we may collect directly from our customers and users include name, email address, mailing address, phone number, job title, payment and billing information, and any other information provided by the user (including a user-submitted photograph if a user chooses to provide one).

2.3 When you use our website or platform, we automatically collect the following information:



2.4 Internet Protocol Address (“IP address”). IP addresses are assigned by your Internet service provider to the modem used to access the Internet for connected devices in your home and/or workplace. Any devices using the modem to access the Internet may broadcast the same IP address. At home, connected devices could include one or more laptop/desktop computers, tablets, mobile phones, smart/connected TVs and gaming consoles.

At work, connected devices could include one (or all) floor(s) in an office building. Our website receives your IP address from your Internet browser each time you request a file or web page.

2.5 User-Agent. Due to the nature of how the Internet works, we may receive information (known as “User-Agent”) automatically sent by your web browser, such as data associated with the source device’s Internet browser/content delivery software (e.g., Microsoft Explorer, Mozilla Firefox, Edge, Opera or Google Chrome). The User-Agent information we receive may also include information such as device type (e.g., computer, tablet, mobile device), and/or date/time of visit. Similar to the collection of IP addresses, our website also receives User-Agent information associated with your browser and type of device.

2.6 Information collected by cookies and other similar technologies. We use various technologies to collect information which may include saving cookies to users’ computers. These tools help us understand and improve the performance of our Eduplex website and platform.

3). **How We Use the Information We Collect**

3.1 We may use the information we collect in connection with the services we provide. We may use the information we collect to set up user accounts; provide, operate, and maintain services; process and complete transactions; provide customer service and support and respond to inquiries; to send communications; to prevent fraudulent activity; for any other purpose based on our legitimate interest.



3.2 We use the information we collect to administer and continuously improve our website and platform.

3.3 Promotional Communications. We may use your personal information to contact you with newsletters, marketing, or promotional materials and other information that will benefit you.

3.4 We will use your Personal and Non-Personal Information only for the purposes for which it was collected or agreed with you, for example:

- Analyse the effectiveness of our school
- Collect information about the device you are using to view the site, such as your IP address or the type of Internet browser or operating system you are using, and link this to your Personal Information so as to ensure that the site presents the best web experience for you
- Evaluate the use of the site and services
- For audit and record keeping purposes
- For monitoring learners and communicate necessary information to parents
- In connection with legal proceedings
- Make the site easier to use and give you easy access to learner records and logistic arrangements and other needs
- Personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it
- To assist with school development
- To carry out our obligations arising from any contracts entered between you and us
- To conduct market or customer satisfaction research or for statistical analysis
- To confirm and verify your identity or to verify that you are an authorised customer for security purposes
- To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a



product or service from us and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.

- To notify you about changes to our service
- To respond to your queries or comments
- We will also use your Personal Information to comply with legal and regulatory requirements.
- Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose. In order to protect information from accidental or malicious destruction, when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems.
- You can opt out of receiving communications from us at any time.

3.5 You may opt-out of receiving any, or all, of these communications from us by following the instructions provided in any email we send or by following the unsubscribe link in those emails.

3.6 Analytics. We may use aggregated information that is collected to understand general information and trends related to our website, such as how many users have visited our web site during a given period, and the types of devices the visitors use. The information cannot be used to identify an individual and is used by us to help improve the solutions for consumers/users.

3.7 IP addresses – Fraud Prevention. Our use of IP addresses is limited to helping identify and combat potentially fraudulent activity. IP addresses are stored in our log-files and are deleted as soon as you instruct us.

3.8 Respond to Inquiries. If you choose to contact us directly (by email, form, or postal mail) using the contact information we provide on our website, we will use your contact information to respond to your specific inquiry.



4). **Cookies**

4.1 The Eduplex website and platform may place cookies on your browser to identify you when you return to our website or log in to our software.

4.2 Cookies might be used for the following purposes in order to:

- Enable certain functions,
- Provide analytics,
- Store your preferences, and
- Enable ad delivery and behavioural advertising

4.3 Eduplex uses both Session Cookies and Persistent Cookies.

- A Session Cookie is used to identify a particular visit to our Website. These cookies expire after a short time, or when you close your web browser after using our Website. We use these cookies to identify you during a single browsing session, such as when you log into our Website.
- A Persistent Cookie will remain on your devices for a set period specified in the cookie. We use these cookies where we need to identify you over a longer period. For example, we would use a persistent cookie if you asked that we keep you signed in.

5). **With Whom We Share Information**

5.1 We will not rent, sell or share information about you with other people or non-affiliated companies.

5.2 We may share and disclose information (including personal information) in the following instances:

5.2.1 Vendors and Service Providers. We may share your information with vendors and service providers whom we engage to perform tasks on our and your behalf. More details about these vendors and service providers can be specifically requested.



5.2.2 Under certain circumstances, we may be required to disclose personal information if necessary, to comply with legislation, a subpoena or court order, to establish or exercise our legal rights or defend against legal claims, or to cooperate with government and/or law enforcement officials.

5.2.3 We may share Aggregated Information (i.e., information that cannot be used to identify an individual) for a variety of reasons, including under the following circumstances:

- i). To make our product better and foster transparency.
- ii) We may share aggregate information if necessary, to comply with a subpoena or court order, to establish or exercise our legal rights or defend against legal claims, or to cooperate with government and/or law enforcement officials.
- iii) For any lawful basis.

6). **Security**

6.1 We take security very seriously. Ensuring that the information collected by our website and platform is secure and protected is important to us. Consistent with industry standards and applicable law, Eduplex has established appropriate technical and organizational measures to help prevent unauthorized access to, disclosure, alteration or misuse of information collected by our website and platform ("Collected Data").

6.2 We use Web Services to store all Collected Data and these Web Services employ robust physical and network architecture security program(s) with multiple safeguards.

7). **Encryption**

7.1 All data transmitted between visitors to our website and users of our platform is encrypted in transit.

7.2 All data received and stored by our servers is encrypted at rest.



8). **Physical Security**

8.1 Our technical infrastructure is hosted on accredited data centers. Physical security controls at data centers include 24x7 monitoring, cameras, visitor logs, and entry requirements.

9). **Access Control**

9.1 All services related to operations and infrastructure are accessible only through secure connectivity. All systems require multi-factor authentication. Our back-office, service, and infrastructure password policies require minimum lengths, complexity, expiration, lockout, and often disallows reuse. Eduplex grants access to staff and contractors on the basis of least privilege rules, reviews permissions periodically, and revokes access immediately after employee termination.

10). **Staff and other Employees**

10.1 All our staff and other employees are evaluated.

11). **Vulnerability Management**

11.1 All systems and applications undergo periodic security reviews for vulnerabilities.

11.2 All application dependencies are monitored for vulnerabilities using third party dependency scanning tools.

12). **Incident Management**

12.1 Eduplex maintains industry standard security incident response policies and procedures.

13). **Data Retention**

13.1 If you provide information to us to request a service, we will keep that information for up to twelve months after your last communication with us. If you contact us directly using the contact information provided on our website, we will retain your contact information for a period of up to three months after we respond to your inquiry. After



that, the communications will be deleted from our system, unless we are required by law or yourself to retain it longer.

13.2 IP addresses collected for purposes of the consent management feature are stored in an encrypted manner for 30 days, de-identified and permanently deleted unless you continue using our system.

13.3 Personal information collected for Data Subject Access Requests is only kept until the request is completed. After the request is completed, that personal information is deleted and de-identified unless you continue using our system.

13.4 We will keep personal information provided by you for up to three months after the end of our business relationship. All payment information will be deleted three months after the processing unless we are required by yourself or by law to keep it longer.

14). **Data Storage & Data Transfer**

14.1 IP addresses are an essential component of the Internet. Every request made to a server includes the IP address of the visitor.

14.2 For visitor facing components of ourselves all personal data are securely stored in compliance with national and international directives.

14.3 Eduplex takes an international best practices total view.

14.4 There is a good chance that even you will need to comply with multiple different data protection laws (like the GDPR, the ePrivacy Regulation, POPIA and the Privacy Shield(s)). Therefore it is important that we take a global view and comply with what is common among them.



15). **Children's Privacy**

15.1 The Eduplex website and platform, as educational institution is especially sensitive to the rights of children under national as well as applicable international data protection and privacy laws.

15.2 It is for this reason that the POPIA below-standing stipulations applicable to children are nearly “word for word” included.

15.3 The Protection of Personal Information Act, No 4 of 2013, (POPIA) and Children

a). **Section 11 of POPIA, regarding Consent, Justification and Objection stipulates that:**

Personal information may only be processed if—

the data subject or a competent person where the data subject is a child consents to the processing;

processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;

processing complies with an obligation imposed by law on the responsible party;

processing protects a legitimate interest of the data subject;

processing is necessary for the proper performance of a public law duty by a public body;

or

processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied.

The responsible party bears the burden of proof for the data subject's or competent person's consent [as referred to in subsection (1)(a)].

The data subject or competent person may withdraw his, her or its consent, [as referred to in subsection (1)(a)], at any time: Provided that the lawfulness of the processing of personal information before such withdrawal or the processing of personal information [in terms of subsection (1)(b) to (f)] will not be affected.

b). **A data subject may object**, at any time, to the processing of personal information— [in terms of subsection (1)(d) to (f)], in the prescribed manner, on reasonable grounds relating to his, her or its situation, unless legislation provides for such processing; or



for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications [as referred to in section 69].

If a data subject has objected to the processing of personal information [in terms of subsection (3)], the responsible party may no longer process the personal information.

c) Section 35 regulates the **General Authorisation concerning Personal Information of Children**

The prohibition on processing personal information of children, [as referred to in section 34], does not apply if the processing is—

carried out with the prior consent of a competent person;

necessary for the establishment, exercise or defence of a right or obligation in law;

necessary to comply with an obligation of international public law;

for historical, statistical or research purposes to the extent that—

the purpose serves a public interest and the processing is necessary for the purpose concerned; or

it appears to be impossible or would involve a disproportionate effort to ask for consent, and sufficient guarantees are provided for to ensure that the processing does not

adversely affect the individual privacy of the child to a disproportionate extent; or

of personal information which has deliberately been made public by the child with the consent of a competent person.

d) **The Regulator may**, [notwithstanding the prohibition referred to in section 34, but subject to subsection (3)], upon application by a responsible party and by notice in the Gazette, **authorise a Responsible Party to Process the personal information of children** if the processing is in the public interest and appropriate safeguards have been put in place to protect the personal information of the child.

The Regulator may impose reasonable conditions in respect of any authorisation [granted under subsection (2)], including conditions about how a responsible party must— upon request of a competent person provide a reasonable means for that person to— review the personal information processed; and



refuse to permit its further processing;
provide notice—
regarding the nature of the personal information of children that is processed;
how such information is processed; and
regarding any further processing practices;
refrain from any action that is intended to encourage or persuade a child to disclose more
personal information about him- or herself than is reasonably necessary given the
purpose for which it is intended; and
establish and maintain reasonable procedures to protect the integrity and confidentiality of
the personal information collected from children.

e) Section 57 regulates **Processing subject to Prior Authorisation**

The responsible party must obtain prior authorisation from the Regulator, [in terms of
section 58], prior to any processing if that responsible party plans to—
process any unique identifiers of data subjects—
for a purpose other than the one for which the identifier was specifically intended at
collection; and
with the aim of linking the information together with information processed by other
responsible parties;
process information on criminal behaviour or on unlawful or objectionable conduct on
behalf of third parties;
process information for the purposes of credit reporting; or
transfer special personal information, [as referred to in section 26], or the personal
information of children [as referred to in section 34], to a third party in a foreign
country that does not provide an adequate level of protection for the processing of
personal information [as referred to in section 72].

The provisions [of subsection (1)] may be applied by the Regulator to other types of
information processing by law or regulation if such processing carries a particular
risk for the legitimate interests of the data subject.

This section and section 58 are not applicable if a code of conduct has been issued and
has come into force in terms of Chapter 7 in a specific sector or sectors of society.



A responsible party must obtain prior authorisation [as referred to in subsection (1)] only once and not each time that personal information is received or processed, except where the processing departs from that which has been authorised [in accordance with the provisions of subsection (1)].

16). **"Do Not Track"**

16.1 Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services.

16.2 Please note that we do not respond to or honour DNT signals or similar mechanisms transmitted by web browsers, except by your personal direct emailed instruction.

17). **Your Rights**

17.1 You can opt-out of receiving certain marketing or promotional communications from Eduplex at any time by using the unsubscribe link in the email communications we send.

17.2 If you would like to request access, review, update, rectify, or delete any personal information we have about you, please contact us and our Privacy Team will respond as soon as possible.

18). **POPIA, GDPR, the ePrivacy Regulation, and the EU-US & Swiss-US Privacy Shield**

18.1 Eduplex has taken the global view with regard to international compliance with the commonalities of multiple different data protection laws (like POPIA, GDPR, the ePrivacy Regulation, and the Privacy Shield(s)).



19). **How to Contact Us**

19.1 If you have any questions about this Privacy Policy or its implementation, you may contact us here or you can send correspondence through this website.

19.2 **Feedback and Complaints**

If you have any questions or comments about our Privacy Policy, or if you have a complaint about how we are using your data, then please write to us or send an email to us at erika.noeth@eduplex.co.za