



PRETORIA BOYS HIGH SCHOOL

WEB-BASED DATA PROTECTION POLICY

1. Introduction

1.1 It is our promise to prospective parents/legal guardians and/or students that we respect the trust you place in us and the privacy of the information you share. Part of providing superior service includes making sure that we are building a relationship of trust with our prospective parents/legal guardians and/or students. Our way of doing that is to let you know in a clear, prominent, and easily accessible way how we collect, use, share, and above all, protect your personal information. In this policy, PBHS, "we", "us" or "the School" refers to Pretoria Boys High. We will only collect personal information that is necessary for the purposes described in this policy and will only process personal information in compliance with applicable laws, including the protection of Personal Information Act (POPIA) and in ways that are for, or compatible with, the Institution's purposes for which the personal information was collected or that are subsequently authorised by you.

1.2 This Policy outlines:

- How and why we collect your personal information;
- How your personal information is used and protected;
- When and with whom we share your personal information; and
- What choices you can make about how we collect, use, and share your personal information.

1.3 The School takes steps to ensure that we manage your personal information properly to maintain your trust. We may collect the following categories of personal information. Not all categories may be collected about every prospective parents/legal guardians and/or students and this will depend on the purpose for which we need the personal information:

- Personal identifiers, such as name and address;
- Device and online identifiers and related information, such as telephone number and email address;
- Internet, application, and network activity, such as cookie IDs and browser visits;

- Government identifiers, such as CIPC registration numbers, national identification numbers and driver's license numbers;
- Demographic information, such as age and date of birth;
- Financial information, such as annual financial statements, bank statements, credit and debit card numbers and claims information;
- Purchase history information, such as products you have bought and returned (school uniforms, books etc.);
- Location information, such as geo-location information;
- Audio, visual, and other sensory information, such as audio and video recordings; or
- Employment information, such as occupation, title, licenses and professional memberships.

2 Collection of Personal Information

2.1 We collect information from you in a variety of ways. It may be:

- Provided directly by you;
- Collected from a device associated with you or your household;
- Collected through in-practice technology; or
- Collected from an external third-party source.

Information Collected From a Device Associated With You

You passively provide us information through technology. Some of this information may be linked to you personally. This information helps our websites and mobile services work correctly and supports our marketing and analytics efforts – our work to understand our students' needs and provide information about our products and services. Here are some examples:

- **Device Information:** We collect technical information when you visit our websites or use our mobile applications or services. This includes information such as Internet Protocol (IP) address, the type of mobile device you use, your device operating system and browser type, a unique device identifier, the address of referring websites, the path you take through our websites, and other information about your session on our websites.
- **Browsing Information:** We use our own and third-party technologies such as cookies, web beacons, and mobile device identifiers to collect information about the use of our websites and mobile services. We use these tools to provide an integrated and more personalized experience for you. For example: cookies allow us to provide you relevant information as you use or return to our site; web beacons allow us to know if a certain page was visited, an email

was opened, or if ad banners on our websites and other sites were effective. Under certain circumstances, we permit third parties to collect information on our websites for their own business purposes using cookies, web beacons, iframes and similar technologies.

- **Precise Device Location Information:** We may collect information about your location when your device is set to provide location information.

Information We Collect Through On-Site Technology

We may collect your personal information from technology we use on our site, such as our facility cameras. We operate cameras in our facility for security and operational purposes, for example, to help us ensure your safety whilst on the school's premises.

Information Provided Directly by You

You actively share information with us in various ways in our facility and online. For example, you share information when you:

- Supply personal information via the online GDE registration process;
- Supply personal information to transfer from one school to another;
- Make an on-site payment, or other transaction, with us;
- Create an account on our website or mobile services;
- Participate in our programs or school tours,
- Conduct a transaction or request a service where we collect information (including when required by law);
- Click on our contact us link on our website; and
- Post a review or comment on one of our social media pages, or post a rating, review or other user generated content on one of our websites or mobile services.

2.2 All personal information that is supplied to the School must be accurate, up-to-date, not misleading and complete in all respects. You undertake to immediately advise the school of any changes to your personal information should any of these details change.

2.3 Our goal is to limit the information we collect to the information needed to support our Institution.

3 Purpose for Collection of Personal Information

3.1 The information collected and processed by the School may be used for the following purposes:

- To fulfill your child's enrolment in order to attend the school;
- To create and maintain your account;
- To conduct auditing and monitoring of transactions and engagement;
- To conduct marketing, personalization, and third-party advertising, subject always to your right at any time to opt out of such communication. If you want to remove your contact information from all lists and newsletters, please visit unsubscribe on the website;
- To protect the security and integrity of our website, mobile services and our school, and help prevent fraud;
- To update our operational and technical functionality;
- To conduct Institution analysis, such as analytics, projections and identifying areas for operational improvement;
- To conduct research and development; or
- To fulfill our legal functions or obligations.

3.2 All Personal Information which you provide to the School will be used and/or retained only for the purposes for which it is collected, where after it will be permanently destroyed. We will only retain personal information for longer than the purpose for which it was collected if it is required by law or where you have given consent for us to retain such information for an extended period.

4 Sharing of Personal Information

4.1 We will not sell or rent your personal information for money.

4.2 We may share your personal information in limited circumstances, such as conducting activities of our Institution, in the event, all or a part, of debt collection, when legally required as described below, or with your consent.

4.3 We will not share your personal information outside of our database, except in the following circumstances:

- **Department of Education** – The department of education has access to certain personal details that belong to our students.

- **Legal Requirements and Protection of Our Institution and Others** – We may share your personal information in other special circumstances, which include situations when sharing is required by law, or we believe sharing will help to protect the safety, property, or rights of the School, parents/legal guardians and/or students, our associates, or other persons. Examples include:

Protecting the health or safety of parents/legal guardians and/or students;

Addressing crimes committed on School property;

Identifying and addressing fraud or financial risk;

Providing personal information from cameras to law enforcement at their written request;

Responding to a search warrant or other valid legal inquiry; and

Responding to an investigative body in the case of a breach of an agreement or violation of law.

4.4 Our Website also links to other websites that may collect personally identifiable information about you. The School is not responsible for the privacy practices or the content of those linked websites.

4.5 Where we need to transfer your personal information outside the borders of South Africa, we will ensure that we only transfer the personal information to countries that have similar privacy laws to those applicable in South Africa or to a party who is contractually bound to comply with data protections obligations which impose no lesser legal requirements than those imposed by POPIA.

4.6 Before transferring personal information to a third-party contractor, such as an authorised service provider, the School will obtain assurances from the third party that it will process personal information in a manner consistent with this policy. Where we learn that a third party contractor is using or disclosing personal information in a manner contrary to this policy, we will take reasonable steps to prevent such use or disclosure.

5 With Your Consent

5.1 In circumstances other than those described above, we will ask for your affirmative consent before we share your personal information outside of our school, and we also will not sell or rent your personal information for money.

6 Websites and Mobile Applications

- 6.1 By using our websites, mobile applications, Wi-Fi and/or by providing your information to us, you expressly consent to our collection and use of the information you disclose to us in accordance with this policy, including but not limited to your consent for us to share your information as set out in this privacy policy. If you disclose any personal information relating to other people to us, you warrant that you have the authority to do so and to permit us to use the information in accordance with this policy.
- 6.2 By using our websites, mobile applications, Wi-Fi and/or by providing your information to us, you agree to the practices described in this policy and you agree to the School, its officers, employees, servants, agents and/or contractors and/or other third parties to process (which will include collecting, using and disclosing) your personal information for the purposes stated in this policy.
- 6.3 If you do not agree to this policy, please do not use our websites, mobile applications, Wi-Fi and/ or provide your information to us. Any use by you of our websites, mobile applications, Wi-Fi and/ or any provision by you of your information will be deemed to constitute your acceptance of the terms in this policy.

7 Security

- 7.1 The security and confidentiality of your personal information is important to us. We have implemented technical, administrative, and physical security measures to protect your personal information from unauthorised access or disclosure and improper use.
- 7.2 Access to your personal information is restricted only to those employees who need the personal information to perform a specific job/task. All employees with access to Personal Information are kept up-to-date on our security and privacy practices. After a new policy is added, these employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for our parents/legal guardians and/or students personal information.
- 7.3 We are committed to ensuring that our security measures which protect your personal information are continuously reviewed and updated where necessary.
- 7.4 It is important for you to protect yourself against unauthorised access to your account. Be sure to log out of your account or to close your browser after you have completed your visit to the website or mobile application.

7.5 Whilst we will take all reasonable measures to protect your personal information, we cannot guarantee nor do we accept any liability of whatsoever nature for any unauthorised or unlawful disclosure and/or use of your personal information, either by employees and/or made by any third parties (including third party service providers) who are not subject to our control, unless such disclosure and/or use is as a result of our gross negligence.

8 Your rights

8.1 Upon reasonable request and in accordance with POPIA, we will grant parents/legal guardians and/or students reasonable access to their personal information and will permit them to correct, amend or delete personal information that is incomplete or inaccurate.

8.2 Should you so request, we will provide you with the record or a description of the personal information which we have about you, including information about the identity of all third parties who have, or have had, access to the personal information: (i) within a reasonable time; (ii) at a prescribed fee, if any; (iii) in a reasonable manner and format; and (iv) in a form that is generally understandable.

8.3 We will take reasonable steps to ensure that all personal information is kept as accurate, complete and up-to-date as reasonably possible but may not always expressly request you to verify and update your personal information, unless this process is specifically necessary. We expect that you will notify us from time to time in writing of any updates required in respect of your personal information.

8.4 In addition, you may cancel or modify the email communications you have chosen to receive from us by following the instructions contained on our website. If you have any questions concerning your personal information or how to exercise these rights, please Contact Us at info@boyshigh.com.

8.5 You also have the right to lodge a complaint with the Information Regulator. You can email the Information Regulator with your complaint/query at <mailto:inforeg@justice.gov.za> or call them on 012 406 4818. Visit their website for more details”
<https://www.justice.gov.za/inforeg/contact.html>.

8.6 The Institution reserves the right to amend this policy at any time. All amendments to this policy will be posted on the website

