



Privacy Policy

OVERVIEW

Purpose	The purpose of the Privacy Policy is to contractually regulate St Stithians Online School's right to collect and utilise user information.
Custodian	Registrar of Valentre Institute
Approval Authority	St Stithians College Rector
Version History	Version 1, Effective 23 May 2021



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1. INTRODUCTION

- 1.1. This privacy policy ("**this Policy**") of St Stithians Online School, in collaboration with Valentre Institute ("**School**", "**us**" or "**we**") contractually regulates our right to collect and use the information that we have about you ("**User**" or "**you**", which includes both the parent or legal guardian and the minor child of the parent or legal guardian) and your rights in this regard, and applies to your use of our website (<https://www.ststithiansonlineschool.com>) including all sub-domains), which includes the learner management system, also referred to as the *Online Campus* ("**Website**"), the School App as downloaded from a mobile app store ("**App**") and the services that we offer ("**Services**") through our platform made available through the App and Website (collectively, the "**Platform**"). The Services that we offer include offerings delivered by Valentre Institute alone, as well as any other offerings delivered by Valentre Institute in partnership with St Stithians Online School. This Policy creates a legally binding agreement between us and you and will apply as soon as we collect your data, or you start using the Platform or Services.
- 1.2. Your use of the Platform and Services will be regulated by this Policy as well as any other terms that are available on the Platform and/or the agreements that you enter into with us.
- 1.3. **Changes to this Policy:** unless notice is required in terms of any applicable laws, we may change this Policy from time to time in line with any changes that the law or our internal business operations require, without prior notice. However, we will notify you of any material changes to this Policy. The current version of this Policy that applies each time you visit and/or use our Platform and/or Services will regulate our relationship. It is your responsibility to consider the Policy each time you visit the Platform. **If you do not agree with any terms of this Policy, you must stop using the Platform and/or Services.**



- 1.4. The right to privacy and this Policy is important to us. We are committed to taking steps to protect your privacy when you use the Platform and Services and we therefore implement business practices that comply with the South African Protection of Personal Information Act, 4 of 2013 ("**POPI**") and the General Data Protection Regulation ((EU) 2016/679) ("**GDPR**") (collectively referred to as "**Applicable Law**" in this Policy). In this Policy, we explain how we will use and protect your Personal Information in terms of Applicable Law.

2. PERSONAL INFORMATION

Where we refer to "**Personal Information**" in this Policy, we mean personal information as defined in Applicable Law, being information that may be used to directly or indirectly identify you. Personal Information includes, for example, your name, surname, email address, identity number, contact details, photograph and location.

3. COLLECTING YOUR PERSONAL INFORMATION

- 3.1. We collect Personal Information about you from the following sources:
 - 3.1.1. directly from you when you provide it to us, such as when you sign up to use our Platform and Services, contact us or through the course of our relationship with you;
 - 3.1.2. in the case of a child, from your parent or legal guardian;
 - 3.1.3. from public sources where you have made your Personal Information public, such as on social media;
 - 3.1.4. from your use of our Platform or use of any features or resources available on or through our Platform; and
 - 3.1.5. from third parties when you interact with them through the Platform, where they are authorised to share your Personal Information or your



interaction with us as a result of the Services or as required of the third parties to share it with us or otherwise if Applicable Laws allow us.

- 3.2. Where you provide information, including Personal Information, about someone other than yourself, you warrant that you have that person's consent to provide that information for the purpose for which you provide it to us.

4. CATEGORIES OF PERSONAL INFORMATION THAT WE PROCESS

- 4.1. **General personal details:** your name and surname, gender, date of birth, age, nationality, language preferences, identity or passport number.
- 4.2. **Special personal information:** such as biometric information, health information, genetic data, race or ethnic origin, or criminal behaviour of the data subject.
- 4.3. **Contact details:** your address, contact number, email address, and public social media profile(s).
- 4.4. **User information:** Personal Information included in correspondence, transaction documents, use of the Services or other materials that we process in the course of providing the Services.
- 4.5. **Education information:** present school, level of education, type of education curriculum and subjects being studied, and extracurricular activities.
- 4.6. **Consent records:** records of any consents you have given us in respect of using your Personal Information and any related information, such as the specific details of the consent. We will also record any withdrawals or refusals of consent.
- 4.7. **Payment details:** details related to any payments made, such as payment method, information provided by payment gateway service provider, payment amount, date and reason for payment and related information.



- 4.8. **Data relating to our Platform:** such as the type of device you use to access the Website and App, the operating system and browser, browser settings, IP address, dates and times of connecting to and using the Platform and other technical communications information.
- 4.9. **Cookies and other technologies.**
- 4.10. **Account details:** such as your username, password, usage data, and aggregate statistical information.
- 4.11. **Content and advertising data:** records of your interactions with our online advertising on the various websites which we advertise and records relating to content displayed on web-pages displayed to you.
- 4.12. **Views and opinions:** any views and opinions that you choose to share with us, or publicly post about us on social media platforms or elsewhere.
- 4.13. **Children's Personal Information:** Personal Information of any User that qualifies as a *child* in terms of the Applicable Law of the applicable jurisdiction necessary for us to render the Services and with the consent of a parent or guardian. We will only intentionally process the Personal Information of children with the consent of a parent or guardian of that child where required in terms of Applicable Law.

5. PURPOSES OF PROCESSING PERSONAL INFORMATION

- 5.1. We only process adequate and relevant Personal Information for the following purposes and legal bases:
- 5.1.1. to perform in terms of our agreement with you (provide you with the Services and access to the Platform, including registering for and delivering the Services);



- 5.1.2. operate and manage your account or your relationship with us;
 - 5.1.3. monitor and analyse our business to ensure that it is operating properly, for financial management and for business-development purposes;
 - 5.1.4. contact you by email, telephone, text message, push notifications or other means to inform you about our Services, unless you have opted-out of such communications (direct marketing);
 - 5.1.5. form a view of you as an individual and to identify, develop or improve the Platform and Services that may interest you;
 - 5.1.6. carry out market research and surveys, business and statistical analysis and necessary audits;
 - 5.1.7. for fraud prevention;
 - 5.1.8. perform other administrative and operational tasks like testing our processes and systems and ensuring that our security measures are appropriate and adequate; and
 - 5.1.9. comply with our regulatory, legal or other obligations.
- 5.2. In addition to the above purposes, we may use your Personal Information for other purposes if the law allows for it, if you consent to it, or if it is in the public interest to do so. All purposes for the processing of your Personal Information will be allowed in terms of Applicable Law.

6. DIRECT MARKETING

- 6.1. We may process your Personal Information to contact you to provide you with information regarding our Services that may be of interest to you. Where we provide Services to you (where you are a customer of ours), we may send information to you regarding our Services and other information that may be of interest to you, using the contact details that you have provided to us. We



will only send you direct marketing communications where you have consented to us sending you direct marketing or otherwise in compliance with Applicable Laws.

- 6.2. You may unsubscribe from any direct marketing communications at any time by clicking on the unsubscribe link that we include in every direct marketing communication or by contacting us and requesting us to do so.
- 6.3. After you unsubscribe, we will not send you any direct marketing communications, but we will continue to contact when necessary in connection with providing you with the Services or in connection with our business.

7. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

- 7.1. We will keep your Personal Information confidential and only share it with others in terms of this Policy, or if you consent to it, or if the law requires us to share it. We may disclose your Personal Information to:
 - 7.1.1. the qualification bodies that we partner with to provide you with the Services as further described in the Terms and Conditions on the Platform;
 - 7.1.2. our business partners or third party service providers and processors in order to provide you with access to the Platform and/or the Services, such as data storage and other necessary service providers, third party payment processors, etc. in accordance with written agreements with these third parties;
 - 7.1.3. legal and regulatory authorities, upon their request, or for the purposes of reporting any breach of Applicable Law;
 - 7.1.4. accountants, auditors, lawyers and other external professional advisors in terms of written agreements with them;
 - 7.1.5. any relevant party to the extent necessary for the establishment, exercise or defence of legal rights, criminal offences, threats to public security, etc.;



- 7.1.6. any relevant third party if we sell or transfer all or any portion of our business or assets; and
- 7.1.7. any relevant third party provider where our Platform uses third party advertising, plugins or content.
- 7.2. If we engage third party processors to process your Personal Information, the processors will only be appointed in terms of a written agreement which will require the third party processors to only process Personal Information in terms of our mandate, use appropriate measures to ensure the confidentiality and security of your Personal Information and comply with any other requirements set out in the agreement and required by Applicable Law.
- 7.3. Our Platform may connect to various social media websites or apps, including, but not limited to, Facebook, Twitter, LinkedIn, Instagram. If you want to use the Platform for social media integration, we will share your Personal Information with the relevant social media websites or apps.

8. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

- 8.1. Due to the nature of the Services and our business being established in different countries and us working with business partners and service providers in different countries, we may need to transfer Personal Information to and from the different countries for internal business purposes.
- 8.2. We may transfer your Personal Information to recipients in other countries. We will only transfer Personal Information to third parties in countries with adequate data protection laws or do so in terms of a written agreement with the recipient which imposes data protection requirements on that party as required by Applicable Law.
- 8.3. Please note that when you transfer any Personal Information directly to a third party in another country (i.e. we do not send your Personal Information to the third party), we are not responsible for that transfer of Personal Information



(and such transfer is not based on or protected by this Policy). Any Personal Information that we receive from a third party country will nevertheless be processed in terms of this Policy.

9. SECURITY

- 9.1. We have implemented appropriate technical and organisational security measures designed to protect Personal Information against accidental or unlawful destruction, loss, alteration, disclosure, access and other unlawful or unauthorised forms of processing. These measures are in accordance with Applicable Law.
- 9.2. The internet is an open and often vulnerable system and the transfer of information *via* the internet is not completely secure. Although we will implement all reasonable measures to protect Personal Information, we cannot guarantee the security of your Personal Information transferred to us using the internet. **Therefore, you acknowledge and agree that any transfer of Personal Information *via* the internet is at your own risk and you are responsible for ensuring that any Personal Information that you send is sent securely.**

10. YOUR LEGAL RIGHTS

- 10.1. You have certain rights in relation to your Personal Information. As available and except as limited under Applicable Law, you have the following rights in respect of your Personal Information:
- 10.1.1. **right of access:** the right to be informed of and request access to the Personal Information that we process about you;
- 10.1.2. **right to rectification:** you may request that your Personal Information be amended or updated where it is inaccurate or incomplete;



10.1.3. **right to erasure:** the right to request that we delete your Personal Information, subject to applicable limitations and exceptions;

10.1.4. **right to restrict processing:** you may request that we temporarily or permanently stop processing your Personal Information;

10.1.5. **right to object:**

10.1.5.1. you may object to us processing your Personal Information; and

10.1.5.2. to your Personal Information being processed for direct marketing purposes;

10.1.6. **right to information portability:** you may request a copy of your Personal Information and request your information to be transmitted for use by another person; and

10.1.7. **right not to be subject to automated decision-making:** where a decision that has a legal or other significant effect is based solely on automated decision making, including profiling, you may request that your Personal Information not be processed in that manner.

10.2. Where you have provided consent for us to process your Personal Information, you may also withdraw your consent where our processing is based on your consent. However, we may continue to process your Personal Information if another legal justification exists for the processing.

11. USE OF COOKIES AND SIMILAR TECHNOLOGIES

11.1. Cookies are small files about browsing activity that are stored on a device's web browser by the websites that are visited and are generally used to improve user experience. When you use the Platform we automatically receive and record information on our server logs from your browser, such as your location, IP address, general internet usage and Google Analytics information.



This is statistical data about browsing actions and patterns. Cookies enable us to improve our Platform and Services, estimate our audience size and usage patterns, store information about your preferences and recognise when you return to the Platform.

- 11.2. In some instances, we collect and store information about your location through cookies (other than when you share your location with us). We convert your IP address or mobile GPS data into a rough geo-location, and we may use location information to improve and personalise the Platform and Services for you.
- 11.3. You can set your web browser to refuse cookies or by downloading and installing the Google Analytics Opt-out Browser Add-on, but your full use of the Platform or Services might be limited and you may not be able to take advantage of certain promotions we may run.
- 11.4. Please note that third parties may also use cookies, but we do not have access to, or control over them, and therefore cannot take responsibility for them.
- 11.5. The various types of cookies (distinguished by their function, lifespan and origin) that we may collect include the following:
 - 11.5.1. **first party cookies:** cookies that are stored by the actual website or app you are visiting which are only visible to that website or app;
 - 11.5.2. **third party cookies:** cookies that are stored by third parties (other than the actual website or app), such as Google Analytics, and are generally used for cross-site tracking, retargeting and advertising;
 - 11.5.3. **necessary cookies:** cookies that are necessary for the technical operation of a website or app. For example, they enable you to move around on a website or app and to use its features;
 - 11.5.4. **performance cookies:** cookies that collect data on the performance of a website or app. Examples include the number of persons who visit a



website or app, the time spent on the website or app and errors that may arise during the use of the website or app;

11.5.5. **functionality or preference cookies:** cookies that increase the usability of a website or app by remembering a visitor's choices, such as the language preference, login information, location of the visitor, etc.;

11.5.6. **targeting or advertising cookies:** cookies that enable a website or app to send its visitors personalised advertising, often based on your browsing history; and

11.5.7. **session cookies:** these are temporary cookies that are deleted once you close your browser. Permanent cookies are those that are stored on your device until you delete them or until your browser deletes them (after a period specified in the cookie).

12. LINKS ON OUR PLATFORM

Our Platform may include links to other apps or third party websites which do not fall under our supervision. We cannot accept any responsibility for your privacy or the content of these third party sites, but we display these links in order to make it easier for you to find information about specific subjects. **If you use or rely on these links, you do so at your own risk.**

13. RIGHT TO OBJECT

You may, on reasonable grounds, object to us using your Personal Information for certain purposes. If you object, we will stop using your Personal Information, except if Applicable Law allows its use. To exercise this right or to discuss it with us, please contact us on info@ststithiansonlineschool.com.



14. CHILDREN'S INFORMATION AND SPECIAL PERSONAL INFORMATION

- 14.1. Due to the nature of the Services we provide, we collect and use children's Personal Information with the consent of their parents or legal guardians.
- 14.2. We do not intentionally collect or use children's Personal Information (for purposes other than providing the Services to Users that are children) without the consent of a parent or guardian of the child unless the User is capable of consenting to the processing of his/her Personal Information in terms of the Applicable Laws in his/her jurisdiction.
- 14.3. Similarly, we will only collect or process special Personal Information without your consent or if otherwise allowed by Applicable Law.

15. QUALITY AND ACCESS TO YOUR INFORMATION

- 15.1. **Quality:** we want to ensure that your Personal Information is accurate and up to date. You may ask us to correct or remove any Personal Information that you think is inaccurate, by sending us an email on info@ststithiansonlineschool.com.
- 15.2. **Access:** you have the right to request that we provide you with Personal Information that we hold about you. You must contact us directly to do so or send an email to info@ststithiansonlineschool.com. This request may be subject to an access to information request in terms of Applicable Laws and may require you to verify your identity, identify the rights you are wishing to exercise and pay a fee.
- 15.3. The right to access your Personal Information may further be limited in terms of Applicable Law.



16. RETENTION OF INFORMATION

- 16.1. We take every reasonable step to ensure that your Personal Information is only processed for the minimum period necessary for the purposes set out in this Policy.
- 16.2. We retain Personal Information in accordance with the required retention periods in Applicable Law or for legitimate business purposes. We will only retain your Personal Information for the purposes explicitly set out in this Policy. We may keep Personal Information indefinitely in a de-identified format for statistical purposes, which may include for example statistics of how you use the Platform and Services.
- 16.3. This Policy also applies when we retain your Personal Information.
- 16.4. We may retain your Personal Information for the duration of any period necessary to establish, exercise or defend any legal rights.

17. SECURITY BREACH

We will report any security breach to the applicable regulatory authority in terms of Applicable Law and to the individuals or companies whose Personal Information is involved in the breach. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your Personal Information, kindly notify us by sending an email to info@ststithiansonline.com.



18. LODGING A COMPLAINT

18.1. If you want to raise any objection or have any queries about our privacy practices, you can contact our data protection officer on info@vststithiansonlineschool.com.

18.2. You also have the right to formally lodge a complaint in terms of Applicable Law as follows:

Applicable Law	Regulatory authority name	Contact details
POPI	The Information Regulator	Website: http://www.justice.gov.za/infocore/index.html Address: SALU Building, 316 Thabo Sehume Street, Pretoria Tel: 012 406 4818 Fax: 086 500 3351 Email: infocore@justice.gov.za
GDPR	The European Commission	Online complaint procedure: https://ec.europa.eu/info/about-european-commission/contact/problems-and-complaints/how-make-complaint-eu-level/submit-complaint_en Address: European Commission, Secretary-General B-1049 Brussels, BELGIUM Fax: 3222964335



19. LEGAL DISCLOSURE

19.1. **Platform owner:** Valenture Ltd, company number 12192134.

19.2. **Legal status:** Valenture is a private limited company, duly incorporated in terms of the applicable laws of England and Wales.

19.3. **Director:** SS SALTY

19.4. **Email address:** info@ststithiansonlineschool.com

19.5. **Website address:** <https://www.ststithiansonlineschool.com>

19.6. **Physical and postal address:** 100 Brompton Rd, London, SW3 1ER, United Kingdom.

19.7. **Registered office address:** Quadrant House, Floor 6, 4 Thomas More Square, London, United Kingdom, E1W 1YW.

Last updated: 19 May November 2021