|  |
| --- |
| **KINCOTTAGE – FOREST & MONTESSORI INSPIRED HOMESCHOOLING** |
| **Our Privacy Policy: 1/07/2022** |
| This Policy applies to the collection, use, disclosure and protection of personal information relating to customers of Kincottage (hereinafter referred to as “the Programme”), all vendors and suppliers of the Programme and all users of the Programme’s Website. |
| **1. Basic principles** |
| To ensure that the personal information that you provide to us remains accurate in line with the Protection of Personal Information (“POPI”) Act, 2013 and any other applicable legislation.  **2. What we mean by Personal Information** |
| 2.1. “Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, as defined in section 1 of the POPI Act.  2.2. When we refer to personal information (or personal data) in this Policy, we mean information that can identify you or is capable of identifying you.  2.3. We collect personal information from you when you provide such information via email or submit physical copies, for example when you complete the Programme’s Enrollment Form and supply supporting documents in support of your child’s application to join the Programme, or you contact us with enquiries. The Programme only collects and processes personal information which you provide to us. |
| **3.Consent**  3.1. If you choose to provide us with personal information, you are consenting voluntarily and on an informed basis to the Programme’s processing of your personal information which includes collection, use, storage and transfer of that personal information where applicable. |
| **4. Processing of Personal Information**  4.1. “Processing” means processing as defined in section 1 of the POPI Act.  4.2. You shall have sole responsibility for the accuracy, reliability, integrity, quality, and legality of personal information.  4.3. We will not sell, share, or rent your personal information to any third party or use your phone number for unsolicited messages, without your express consent.  4.4 We agree and warrant that the processing of personal information shall be carried out in accordance with the relevant provisions of the POPI Act.  4.5. You hereby consent to the processing of your personal information in accordance with this privacy policy.  4.6. We shall keep your personal Information confidential and shall only process personal information on behalf of and in accordance with your documented and lawful instructions to fulfil the purpose set out in this privacy policy.    **5. The type of information we collect about you** |
| 5.1. We collect and store amongst others the following personal information relating to parents and their child/children: Name, ID number, email address, phone numbers, physical contact information, medical aid & membership number  5.2. Other information, such as the name and contact details of persons who can be contacted in an emergency (when a parent is unavailable) and the family doctor’s phone number and physical contact details.  **6. How we collect information about you**  6.1. You provide personal information to us when communicating with us. For example we collect personal information from you when you provide such information via email or submit physical copies, such as when you complete the Programme’s Enrollment Form and supply supporting documents in support of your child’s application to join the School, or you contact us with enquiries. The Programme only collects and processes personal information which you provide to us.  6.2. We will always endeavour to secure the integrity and confidentiality of your personal information which is in our possession or under our control.  **7. How we use your information**  7.1. We use your information to validate you as a customer and your child as a pupil at the Programme and in that process we endeavour to establish the suitability of “the fit” between the expectations of parents and the teaching philosophy and method of the Programme.  7.2. We use personal information collected about you to contact you by telephone, post and electronic means (e.g. email, WhatsApp & Facebook,) about our services, registration terms, conditions and fees, events and functions of the Programme, term dates, pupil’s reports, or changes to our services and to communicate with you regarding fee invoices and complaints you may raise.  7.3 We use social media sites such as WhatsApp, Facebook, Instagram and our News & Events webpage to post pictures of Programme events and activities in order to keep the Programme’s community of parents, grandparents and families regularly updated about their child’s/children’s pursuits and the pulse of daily life at the Programme - and confirm that such postings never identify/tag children, parents, grandparents or guardians by name. However, written consent for the Programme to post untagged pictures of children and or parents of the Programme on social media sites is required from a child’s parents. Furthermore, such consent can be withdrawn at any time.  **8. How long do we keep your information for?**  8.1. Unless there is a specific legal or compliance and business requirement mandating us to keep your information, we will not keep it for longer than 12 months after your child leaves the Programme. After the expiry of that 12month period we will delete/de-identify/shred your personal information and records.  **9. Disclosing your information to third parties**  9.1. We do not sell, rent or provide your personal information to third parties for their marketing purposes.  9.2. We reserve the right to access and disclose individual-identifying information to third parties to comply with applicable laws, regulations and lawful government requests, including the School’s attorneys in the event of debt collection.  9.3. We share limited areas of your personal and child’s information with our teaching team (being employees or locum subcontractors) to enable them to competently fulfil their duties in the normal course of the Programme’s business- most importantly medical and emergency contact details.  **10. Security**  10.1. We use technology, tools and procedures (for example, passwords and physical security- locked cabinets and locked premises) to reasonably protect your personal information against unauthorised access and disclosure, however, we make no representations or warranties whatsoever in this regard.  10.2. We will ensure that we have in place reasonable and appropriate security incident management policies and procedures as required by the POPI Act, and shall notify you without undue delay (but in any event within 24 hours) where there are reasonable grounds to believe that there has been, or after becoming aware of, the unlawful or accidental destruction, alteration or damage or loss, unauthorised disclosure of, or access to personal information, transmitted, stored or otherwise processed by us. |
| **11. Access, modification and deletion of your information**  11.1. You have the right at any time to request that we confirm the personal information which we hold about you, and to request that we correct any incorrect or inaccurate personal information which we hold about you.  11.2. We delete personal information when we no longer need it for the purposes that are described earlier.  11.3. Where the law creates an obligation on us to retain your information for a prescribed period, we may not process your request to delete your information.  **12. Data breaches**  12.1. In the event that we become aware that your personal information has been compromised, we will notify you and the relevant Regulatory Authorities as soon as is reasonably possible once the breach has been confirmed, so that you are aware of the nature of the breach and what actions you may need to take in order to protect yourself.  **13. General**  13.1.This Policy shall be governed in all respects by the laws of the Republic of South Africa. 13.2. At times it may be necessary for us to make changes to this Policy. We reserve the right to update or modify this Policy at any time, and from time to time, without prior notice to you. Please review this Policy periodically and especially before you provide any personal information to us. |

This Policy was last updated on the date indicated above. Your continued use of the Programme’s services after any changes or revisions to this Policy shall indicate your agreement with the terms of such revised Policy.

**14. Your rights as a Data Subject**

14.1. You shall have the right to:

14.1.1. access and rectify your personal information collected by us. On your request, we will provide such access as is reasonably practicable and either allow you to rectify such information yourself or implement any rectifications on your behalf;

14.1.2. object to the processing of your personal information if processing is not:

14.1.2.1 with your consent;

14.1.2.2 protecting your legitimate interests;

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

14.1.2.4 necessary for pursuing our legitimate interests.

14.1.3. object to the processing of your personal information for the purposes of direct marketing other than as allowed by the Data Protection Laws and Regulations; and

14.1.4. lodge a complaint with the Information Regulator.

**15. Complaints**

15.1. Any complaints relating to the processing of your personal information must be sent to our Information Officer at michaelaleighgeytenbeek.com, however if your complaint is not dealt with to your satisfaction you may direct it to the Information Regulator: The Information Regulator Contact Details: Tel: 012 406 4818 Fax: 086 500 3351 Email: inforeg@justice.gov.za Website: https://www.justice.gov.za/inforeg