

# Jubilate Primary School



## General Privacy Policy

### JUBILATE PRIMARY SCHOOL TRUST

(Trust no. IT 1709/04 • NPO Reg. No. 037-357 14/05/2005 • PBO Reg. No. 9300 9563 21/06/2006 • EMIS no. 700 400 143)

This policy explains how Jubilate Primary School obtains, uses and discloses information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”).

#### A. The information Jubilate Primary School collects

1. We collect and process individual, company and school information mainly to contact the data subject for the purposes of the sector.
2. We will collect contact details including the name, relevant staff names (in the case of schools and companies) and physical, postal, telephonic and email details.
3. In addition, Jubilate Primary School requires specific information that allows the organisation to function and provide services to learners / parents of learners. This information includes:
  - Pupil demographics and personal information.
  - School tuition.
  - Curricula and examinations offered by the school.
  - Facilities in place at the school, such as number of classrooms, sports fields, etc.
  - Statutory registration details of the school, such as EMIS and Umalusi numbers.
  - Racial equity information that furthers the advocacy of independent schools with relevant stakeholders.
4. Website usage information on the [www.jubilateprimary.co.za](http://www.jubilateprimary.co.za) site may be collected using “cookies”, which allows us to obtain standard internet visitor usage information. A separate privacy policy in this regard can be found on the website.
5. When personal information is collected, data subjects will be notified what information it is required to be provided to us and what information is optional, as well the purpose of the collection and other relevant details relating to the processing of such information.

## **B. How we use personal information**

1. Jubilate Primary School will use information only for the purposes for which it was collected.

2. The information will be used and retained as agreed with the data subject, or in terms of relevant legal obligations, or otherwise as may be required in pursuance of Jubilate Primary School's contractual obligations, its legitimate interests or the interest of the data subject. Examples are where a school's information may be retained for legal or research purposes, or:

- To verify a school or staff member's identity or to verify that someone is an authorised user for security purposes.
- To conduct market or customer satisfaction research or for statistical analysis.
- For audit and record keeping purposes.
- In connection with legal proceedings.

## **C. Disclosure of information**

1. Jubilate Primary School may disclose personal information to our service providers who are involved in the delivery of products or services to the data subject. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

2. We may also disclose personal information where:

- we have a duty or a right to disclose in terms of law.
- we believe it is necessary to protect our rights, or the rights of data subjects

## **D. Information security**

1. We are legally obliged to take reasonable and appropriate steps to protect the personal information we hold and to prevent unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that a personal information remains secure.

2. Our security policies and procedures include:

- Physical security.
- Computer and network security.
- Security in contracting out activities or functions.
- Retention and disposal of information.
- Acceptable usage of personal information.

- Governance and regulatory issues.
- Monitoring access and usage of private information.
- Investigating and reacting to security incidents.

3. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

4. We will ensure that anyone to whom we pass a data subject's personal information agrees to treat the information with the same level of protection as we are obliged to.

## **E. Your rights**

1. Access to information: A data subject has the right to request a copy of the personal information we hold about that subject. To do this, simply contact Jubilate Primary School at the numbers/addresses as provided below and specify what information you are requesting. Jubilate Primary School will require a valid identification of the data subject (copy of ID document / passport, etc.) to confirm identity before providing details of personal information. Please note that any such access request may be subject to a payment of a legally allowable fee.

2. Correction of information: A data subject has the right to ask us to update, correct or delete personal information. We will require valid identification of the data subject (copy of ID document / passport, etc.) before making changes to personal information.

3. Objection and complaints: A data subject has the right to object to the processing of its personal information in the prescribed manner. A data subject may also lodge a complaint with the Information Regulator.

## **F. Definition of personal information**

1. According to POPIA, "personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The full definition can be found in the Act.

## **G. How to contact us**

1. If you have any queries about our privacy practices, wish to withdraw consent, exercise preferences or access or correct your personal information, please contact us at [bursar@jubilateprimary.co.za](mailto:bursar@jubilateprimary.co.za) (attention of the Jubilate Primary School Information Officer) or 011 023 7020.