

WEBSITE AND GENERAL PRIVACY NOTICE

Bluebird Pre-Primary School (Registration Number: [X], 14 Hume Rd, Dunkeld West)

(referred to as "the School", "our", "we", "us")

1 Introduction

- 1.1 We are delighted that you have visited our website and shown interest in the School. We take the protection of your personal information seriously and want you to feel safe when you are visiting our website and/or engaging with us.
- 1.2 This Notice sets out how we will handle your personal information, as defined under applicable law, and covers any information, including personal **and** special personal information, that you give to us or which we collect from third parties ("Personal Information").
- 1.3 In carrying out our services, we will use your Personal Information in accordance with this Notice and applicable law.
- 1.4 Whilst we try to balance our legitimate interests with your reasonable expectation to privacy and to take all reasonable measures to prevent unauthorised access to, or disclosure of your Personal Information, **it is impossible to guarantee that your Personal Information will be 100% secure.**

2 How this Notice applies to you

- 2.1 **This Notice will apply whenever you submit Personal Information to the School, which will include (but is not limited to) when you browse our website and software applications and/or any related (and/or enhanced) mobi-sites, software applications or any other portals specifically made available by the School in relation to this platform ("Website") or engage with us or any of our product and/or service offerings including instances where your Personal Information is submitted to us through or by a third party (collectively "Services").**
- 2.2 **Your continued use of our Website and Services indicates that you (which may include any representative acting on your behalf) have both read and consented to the terms of this Privacy Notice and hereinafter you shall be referred to as "you", "your or "user").**
- 2.3 **If you do not agree to any of the provisions of this Notice, then you should not submit any Personal Information to the School. However, we note that if you do not consent to this Notice, or any parts thereof, we may not be able to provide you with our services.**
- 2.4 **Our Services are only intended to be used by persons aged 18 years or over.**

Disclosure and Processing of Personal Information related to Children.

Due to the nature and content of the services we offer, you may provide us with, and we may be privy to or need to process some/limited, Personal Information related to a child or children. These persons being minors, as legally defined, ("Child") are afforded additional protections under the applicable law.

To this end, we endeavour to limit the type and extent of any Personal Information that we process in relation to any Child and in doing so to comply with the principles set out under applicable law and this Notice.

However, to the extent that any Personal Information is disclosed or processed related to a Child, either in using this website and/or any of our services, then you:

- a) warrant that you are a competent person and are authorised to consent to the disclosure and processing of such Child's Personal Information, on their behalf (you consent as their parent or guardian or otherwise authorised person);
- b) warrant that you have contracted our services for a legitimate (and not harmful) purpose; and
- c) **consent to the processing of your/the Child's Personal Information and agree to be bound by the provisions of this Notice, which shall apply equally in relation to your/the Child's Personal Information.**

3 Scope of our Processing

3.1 *What we Collect*

In the execution of our Services, we may collect information that allows you to be identified, such as:

- (a) General identification and contact information including your name, ID number, race, physical address, postal address, email address, telephone numbers, gender, marital status, date of birth and/or the internet address of your domain;
- (b) Financial information and account details, such as bank account numbers, credit card numbers, name and household income information;
- (c) Academic information; and/or
- (d) Other sensitive and special categories of personal information (including health, religious, biometric (e.g images) and criminal behaviour information, - to the extent that such is necessary for the purposes of carrying out the School's services, such relates to a child's behaviour and best interests and/or such is legislatively mandated or required.

3.2 *How we Collect*

- 3.2.1 You may provide Personal Information to us either directly or indirectly (through an agent or intermediary) through completing a School application form or requesting further information about our School, whether in writing, through our website, over the telephone, via our social media channels, or through submitting information to us during the course of our school open days or any other means.
- 3.2.2 We may also, to the extent such is legally permitted, collect your personal information from your appointed agent, any regulator, or other third party that may hold such information

3.3 *How we Use Personal Information*

3.3.1 We may collect, use, transfer or process your Personal Information:

- (a) to provide and perform our Services to you and to improve or evaluate the effectiveness of the School, its products, services or offerings;
- (b) to comply with internal and external health and safety protocols;
- (c) to respond to and comply with your instructions, complaints or requests;
- (d) to operate, develop and manage our website/other platforms including personalising your experience on our site to allow us to deliver the type of content in which you are most interested.
- (e) for security (including fraud and crime prevention/reporting), administrative, auditing, operational, marketing and legal or regulatory purposes (which will include complying with any law enforcement agency requests);
- (f) for operational, marketing, auditing, legal and record keeping requirements;
- (g) to third parties for reasons set out in this Notice or where it is not unlawful to do so (this may include but is not limited sharing information with the National Department of Basic Education);
- (h) outside of the Republic of South Africa, in accordance with applicable law, including for cloud storage and payment purposes and the use of any of our websites;

- 3.3.2 We may from time to time (and at any time) contact you for market research about services, products and offerings available from the School or specific affiliates or subsidiaries which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications by informing the school accordingly, in writing.

3.4 Disclosure of Personal Information

- 3.4.1 Your Personal Information may be disclosed with the School's affiliates, subsidiaries, employees, agents, sub-contractors, national authorities, government departments and selected third parties who process the information on our behalf.
- 3.4.2 We may also disclose your Personal Information to third parties for the purposes of rendering our Services and for the reasons recorded in clause 3.3 above, including any third parties with whom our supplies and services are carried out/provided in conjunction with and/or who are involved in the completion of our supplies and services and who may need to have your Personal Information in order to fulfil your request or the services (e.g. Third party payment platform providers, examination facilitators, sports facilitators, or cloud service providers).
- 3.4.3 Wherever these persons are located outside of the country (and your Personal Information may be transferred cross-border) we will adhere to applicable laws, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

3.5 Security

- 3.5.1 While we cannot ensure or warrant security on the internet or of any of the Personal Information you provide us, we implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information. We continue to maintain and improve our security measures over time and in line with legal and technological developments.

3.6 Retention

- 3.6.1 We may store your Personal Information directly or on a central or separate database. If the location of the central database is in a country that does not have substantially similar data protection laws, we will take all legally mandatory required steps to ensure that your Personal Information is adequately protected.
- 3.6.2 We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of applicable law. However, generally, we will not retain your information for longer than is necessary or for the periods required by applicable law.

4 Your Rights

- 4.1 As a user/data subject, you have certain rights, including the right:

- (a) to access your Personal Information stored and processed by us. This may be done by emailing us at the address referred to in clause 5 below. Details of the personal information which we hold about you can be requested under the Promotion of Access to Information Act, 2000 ("PAIA"). If you would like to obtain a copy of your personal information held by us, please review our PAIA Manual located on our website;
- (b) to correct/rectify Personal Information that we hold on your behalf, in instances where such Personal Information is incorrect or incomplete;
- (c) to erase Personal Information (also known as 'the right to be forgotten'). In simple terms, this enables you to request the deletion or removal of your information where there is no compelling reason for us keep using it. This is not a general right to erase; there are exceptions. For example, we have the right to continue using your personal data if such use is necessary for compliance with our legal obligations or for the establishment, exercise or defence of legal claims;
- (d) to restrict/suspend processing of Personal Information to only that which is strictly necessary for us to perform our services to you. Please note that this right is limited in certain situations: when we are processing your personal information that we collected from you with your consent you can only request restriction on the basis of: (a) inaccuracy of data; (b) where our processing is unlawful and you don't want your personal information erased; (c) you need it for a legal claim; or (d) if we no longer need to use the data for the purposes for which we hold it. When processing is restricted, we can still store your information, but may not use it further;
- (e) to complain- if we breach any of the terms of this Privacy Notice, to complain to the requisite data protection authority in South Africa;
- (f) to withdraw your consent at any time, if the processing of the Personal Information is based on consent;

(g) to object to processing of Personal Information if such processing is based on legitimate interests; and

(h) to object to the processing of Personal Information for direct marketing purposes.

4.2 The exercise of these rights is free of charge.

5 Complaints

5.1 If, you wish to raise a complaint regarding the processing of your Personal Information then please first reach out to the School's designated Information Officer at: info@bluebird.org.za

5.2 However, if you are still unsatisfied with how we have handled your Personal Information, you can lodge your complaint with the Information Regulator on the following contact details:

Information Regulator
Tel: 012 406 4818
Fax: 086 500 3351
Email: POPIAComplaints@info regulator.org.za
Website: www.info regulator.org.za

6 Indemnity

In agreeing to the provisions of this Notice, you hereby unconditionally agree to indemnify us against any liability that may result from your use of this website and the processing of your Personal Information, including any loss, damage or injury arising from any inaccurate or incomplete Personal Information provided to us by the you and/or any third party and/or any unintentional disclosure of your Personal Information to any unauthorised persons.

7 Log Files

When you visit our website, even if you do not create an account, we may collect certain information automatically. This includes your IP address, Internet Service Provider (ISP), browser type, the website that referred you to us, the pages you visit on our site, the date and duration of your visit, and other technical details about your device and operating system. This data is collected for security monitoring, website optimisation, and analytical purposes. It is not used to personally identify visitors unless required by law enforcement, cybersecurity investigations, or combined with other voluntarily provided personal information. Log data is stored securely and retained for 12 months before being deleted or anonymised.

8 Cookies

We use cookies and similar technologies to enhance your browsing experience. A cookie is a small piece of information stored on your device by your web browser for record-keeping purposes.

The types of cookies we use include:

- **Session cookies** – These are temporary cookies that help maintain your session while browsing our site. They expire when you close your browser.
- **Permanent/Functional cookies** – These store a unique code on your device to recognise you on future visits and enhance your experience.
- **Third-party cookies** – We may use third-party services such as Google Analytics to track website usage and improve our services. These cookies may collect anonymised data and are subject to the privacy policies of the respective providers.

You can manage your cookie preferences through your browser settings.



9 Third Party Links on the Website

The services available through the Website, may contain links to other third-party websites. We are not responsible for the content or privacy policies of these third-party websites.

10 Amendment of this Notice

- 10.1 We may amend this Notice from time to time.
- 10.2 Any such amendment will come into effect and become part of any agreement you have with the School when notice is given to you of the change by publication on our website. It is your responsibility to check the website often.