

CURRO HOLDINGS LIMITED

DOCUMENT NAME	IT PRIVACY POLICY
DOCUMENT NUMBER	CURE04PO
POLICY AREA	INFORMATION TECHNOLOGY

IT PRIVACY POLICY

1. INTRODUCTION

- 1.1 Curro Holdings Ltd (Curro) is committed to protecting and respecting users' privacy when utilising Curro's electronic information and communication systems.
- 1.2 In terms of the Protection of Personal Information Act, No. 4 of 2013 (the Act), Curro will be responsible for the protecting and respecting of the users' electronic information and communication systems.

2. DEFINITIONS

- 2.1 **'Users'** mean all persons including, but not limited to, permanent or temporary employees, directors, consultants, contractors, parents, learners and trainees who have access to, or use of, Curro's electronic information and communication systems.
- 2.2 **'Cookies'** are small amounts of data generated by a website and saved by your web browser. Its purpose is to remember information about you, similar to a preference file created by a software application. While cookies serve many functions, their most common purpose is to store login information for a specific site.
- 2.3 An **'IP address'** is a set of numbers assigned to a user's computer during a browsing session. It is activated whenever the user logs onto the Internet via his/her Internet service provider or network.
- 2.4 **'Information Security Officer'** is the person appointed and employed by Curro to enforce and manage this policy.
- 2.5 **'Policy'** means this IT Privacy Policy.
- 2.6 Reference to **'consent'**, **'your consent'** or **'your explicit consent'** include the clicking of **'application'** or **'submit'** button or **'I agree'** button on Curro's website or MyHub application.

3. SCOPE

- 3.1 This policy sets out the guidelines and principles that will govern how Curro collect and process any personal information collected from users or provided by users to Curro.
- 3.2 A copy of this policy should be available at all times on the Curro websites and apps.

4. HOW CURRO COLLECTS INFORMATION FROM USERS

- 4.1 Users may provide Curro with personal information while completing either online forms or any other forms and documents at any Curro site or offices or school or by means of telephonic conversation, email or any other communications channel. This includes information provided to Curro:
 - 4.1.1 during enrolment;
 - 4.1.2 by completing a contact document;
 - 4.1.3 by subscribing to services;
 - 4.1.4 by participating in social media forums on/or linked to Curro websites;
 - 4.1.5 by completing a survey, and
 - 4.1.6 by reporting a problem regarding Curro websites.
- 4.2 With each visit to Curro websites, Curro automatically collect the following information:
 - 4.2.1 Technical information, including the Internet Protocol address ('IP address') used to connect a user's computer to the Internet, their login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

4.2.2 Information about user's visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site, date and time, services/products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information such as scrolling, clicks and mouseovers, methods used to browse away from the page and any phone number used to call our customer service number.

4.2.3 Cookies

4.2.3.1 Cookies may be used by Curro to understand better how users navigate and use our site. Cookies allow Curro to determine how frequently particular pages are visited, the most popular areas of its site and how frequently particular pages are visited. Cookies also allow Curro to make its sites more user friendly, for example, permanent cookies allow Curro to save the user's password so that the user does not have to re-enter it every time he/she visits its site.

4.2.3.2 Cookies do not contain personal information such as users' home address, telephone number or credit card details. However, personal information that Curro stores about users, as per 4.2.3.1 may be linked to the information stored in and obtained from cookies. Curro does not exchange cookies with any third-party websites or external data suppliers.

4.2.3.3 Users' browser generates other information, including which language the website is displayed in and their IP addresses. Users' IP addresses are automatically logged by Curro's servers and used to collect traffic data about visitors to its websites. Curro does not use IP addresses to identify users personally.

4.2.3.4 Curro only keeps cookies for the duration of their visit to its site.

4.3 Information Curro receives from other sources

4.3.1 Curro may receive information about users if they use any of the other websites Curro operates, other services Curro provides or where users have authorised Curro to collect information from selected third parties, e.g. photographers used at school events.

4.3.2 Curro will inform users that it may be shared internally and combined with information collected on Curro's website.

4.3.3 Curro may also obtain information from the third parties with whom it works closely, such as, for example, business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies.

5. USES MADE OF THE INFORMATION

5.1 When given information, Curro will solely use the information to:

5.1.1 carry out day-to-day administration, educational or social and health needs arising from any contracts entered into between a user and Curro and provide users with the information and services they request from Curro;

5.1.2 provide users with information about their child's schooling and associated matters;

5.1.3 provide users with information about other services offered similar to information previously acquired or enquired about;

5.1.4 provide users with information about schooling activities;

5.1.5 notify users about changes to Curro's services;

5.1.6 ensure that content from Curro's site is presented in the most effective manner for a user, and

5.1.7 deal with enquiries and complaints made by or about users relating to Curro's site or other services users use.

5.2 When collecting information about users, Curro will use the information:

5.2.1 to administer its site and apps for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

5.2.2 to improve its site and apps to ensure that content is presented in the most effective manner for users;

5.2.3 to allow users to participate in interactive features when elected as part of Curro's efforts to keep its site safe and secure;

5.2.4 to measure or understand the effectiveness of advertising and present relevant advertisements, and

5.2.5 to make suggestions and recommendations to users of its site about goods or services that may interest them.

5.3 When receiving information from other sources:

5.3.1 Curro may combine such information with information received and information collected regarding users. Curro may use such information and the combined information for the purposes set out above, depending on the types of information it receives.

5.4 Submission of personal information on behalf of another

5.4.1 Information provided on behalf of someone else, i.e. their child or spouse, should be done with the necessary permission before submitting such information.

5.4.2 On receipt of personal information, Curro assumes that the necessary consent has been obtained and will process the personal information as per the users' instructions. Users indemnify Curro against any third-party claim where a third-party claims that personal information has been processed without the necessary consent or other available exception under the act.

5.5 Curro will only use personal information for other purposes when:

5.5.1 consent is given by users;

5.5.2 it is in the interest of the user, i.e. necessary to lessen or prevent a serious or imminent threat to life, health or safety;

5.5.3 it is required by law or for law enforcement purposes;

5.5.4 where consent for the use and disclosure of personal information is required, the school will seek consent from the data subject directly. In the case of a learner's personal information, the school will seek the consent from the learner (if legally be able to give the permission) and/or parent/guardian, depending on the circumstances and the learner's mental ability and maturity to understand the consequences of the proposed use and disclosure, and

5.5.5 with regard to primary schools only: Curro will always require the consent of the learner's parents/guardian(s) and will treat consent given by the parent/guardian as consent given on behalf of the learner.

6. DISCLOSURE OF INFORMATION

6.1 Curro may share the information with any member of its group, meaning its subsidiaries and ultimate holding company, as defined in the Companies Act, No. 71 of 2008. Curro will not share the information with any third parties, other than the following exceptions:

6.1.1 Analytics and search engine providers that assist Curro in the improvement and optimisation of the site.

- 6.1.2 On the sale or purchase of any business entity or assets, Curro may disclose the information to the prospective seller or buyer of such business or assets.
- 6.1.3 If Curro or a substantial portion of its assets are acquired by a third party, the personal information held by Curro about our users will be one of the transferred assets.
- 6.1.4 Compliance with legislation, court order or other legal obligation to enforce or apply its terms of use applicable to any particular site of Curro or terms and conditions of supply of Curro services to users and other agreements, or to protect Curro's rights, property or safety, or the rights, property or safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. STORAGE OF PERSONAL INFORMATION

- 7.1 The information Curro collects from users may be transferred to and stored at a destination outside the Republic of South Africa ('RSA'). It may also be processed by staff operating outside the RSA who work for Curro or for one of our suppliers/service providers. Such staff may be engaged in, among other things, the fulfilment of a user's order/our obligations towards a user, the processing of a user's payment details and the provision of support services. By submitting information, users agree to this transfer, storing or processing. Curro will take all steps reasonably necessary to ensure that the information is treated securely and in accordance with this privacy policy.
- 7.2 All information users submit, is stored on Curro's secure servers. Hard copies of documents are stored at secure locations. Users are expected to keep passwords given of selected, used to access parts of the Curro website, including but not limited to MyHub, confidential and secure.
- 7.3 Records of information kept, will not be retained longer than necessary for operational or archiving purposes, unless retention of record is required or authorised by law. Records of the information may be retained for periods in excess of those contemplated for historical, statistical or research purposes, subject to Curro establishing appropriate safeguards against the records being used for any other purpose and/or Curro has de-identified the record/s.
- 7.4 Transmission of information via the Internet is not completely secure Curro's endeavours to use appropriate and reasonable technical and organisational measures to protect such information but, cannot guarantee the security of users' data transmitted to its site or to any other location by electronic means. Any transmission is at the users' own risk.
However, once Curro has received the information, it will use appropriate and reasonable technical and organisational measures to attempt preventing unauthorised access.

8. SOCIAL MEDIA PLATFORMS

- 8.1 Communication, engagement and actions taken through external social media platforms in which Curro, its directors or employees and learners participate are custom to the specific terms and conditions as well as the privacy policies held with each social media platform.
- 8.2 Users must use social media platforms wisely and communicate/engage with them with due care and caution with regard to their own privacy and personal information policies. As Curro do not request personal or sensitive information through social media platforms, users wishing to discuss sensitive details or to resolve issues/concerns, should contact Curro through primary communication channels such as telephone or email.
- 8.3 Curro social media page/(s), including the social media page(s) those of Curro schools, may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs. Users must take caution and good judgement before clicking any shortened URLs published on social media platforms. Curro however, cannot be held liable for any damages or implications caused by visiting any shortened links.

9. INTERCEPTION AND MONITORING OF COMMUNICATIONS

- 9.1 Curro, in accordance with relevant legislation, will intercept, monitor, copy or block communications to and from Curro's communication facilities, including but not limited to our site, MyHub, email, SMSs, etc.

10. USER RIGHTS

10.1 Third-party websites/social media sites

- 10.1.1 Curro does not accept any responsibility or liability should users click on links to partner or advertiser's website from the Curro's website.
- 10.1.2 It is the users' responsibility to check these policies before they submit any personal information to these websites.

10.2 Access to information

- 10.2.1 Users have a right to see/access the information that Curro keeps. Users may request Curro to provide them with any personal information it holds about them upon receipt of a written request and payment of a fee as per the Promotion of Access to Information Act, No. 2 of 2000 ('PAIA Act').
- 10.2.2 Not all information requested may and/or need to be disclosed. Disclosure of information shall take place in accordance with the PAIA Act.
- 10.2.3 Any request received by user in term of the PAIA Act must be handled by the recipient of the request in conjunction with Curro's information officer. Non-compliance by the recipient of the request may put Curro at risk and as such the said failure may led to disciplinary action against the recipient.

11. QUALITY OF PERSONAL INFORMATION

- 11.1. It is the user's responsibility to check the accuracy of the information prior to submission to Curro. On receipt of the information Curro assumes that users have checked it and that the information is accurate.
- 11.2. Users may contact the administration of the school their child attends if the information that Curro holds regarding them or their child(ren) need to be corrected or updated. Requests to update information may take up to 48 (forty-eight) hours to execute.
- 11.3. Curro will endeavour, to the best of its ability, to make available to users the means to amend the information themselves.

12. CHANGES TO OUR PRIVACY POLICY

- 12.1 Any changes Curro may make to its privacy policy will be posted on our site and, where appropriate (not obliged), users will be notified by email.
- 12.2 It is the responsibility of users to ensure that they take cognisance of dates or changes to Curro's privacy policy.

13. CONTACT

- 13.1 Questions, comments and requests regarding the privacy policy can be directed to engage@curro.co.za, for the attention of the IT security officer.

14. AMENDMENTS

- 14.1. This policy is subject for review within one calendar year of the date of last review, update or amendment.

- 14.2. This policy may be subject to review, update or amendment within the set calendar year, if the same is required by or in terms of change in legislation, change in external policy guidelines and/or relevant court rulings.
- 14.3. This policy may only be amended by the department head overseeing the category under which auspices this policy finds application.

Date of incorporation

REVISION SCHEDULE

Date	Reviewed by	Date approved	Approved by	Date of next review
----	Curro IT	-----	-----	2020/07/08
2020/07/08	Curro Legal	2020/09/30	CEO/EXCO	2021/09/30
2021/05/01	Curro Legal	2021/05/31	CEO/EXCO	2022/05/31