



PRIVACY NOTICE

Who are we?

Academy of York (“**Academy of York**” or “**we**”) are a Responsible Party in terms of the Protection of Personal Information Act, 4 Of 2013 (POPIA) with respect to your Personal Information. We process all such Personal Information in order to enable us to do business with you and to provide products and services to you as requested. In this notice, “**you**” means you as an individual with whom we are dealing whose Personal Information we may need to collect and process in order to provide the requested products and services, and for any of the purposes described below.

What Personal Information is collected?

Please note that in accordance with Section 18 of POPIA you are hereby expressly informed of the fact that when you [ENTER DESCRIPTION OF ACITIVITY WHICH GIVES RISE TO THE PROCESSING OF ANY PERSONAL INFORMATION] (“**Academy of York Dealing**”) you may need to provide Academy of York with the following Personal Information, including but not limited to:

- Gender
- Date of birth
- Cell number
- Home Number
- Work Number
- Ethnicity
- Education
- Job Title
- Next of Kin
- Employer Details
- e-mail address;
- name and surname;
- name of company/organisation;
- identity number;
- physical address;



- IP address;
- financial information (bank account particulars);
- telephone number; and
- opinions and preferences.

What do we do with your Personal Information and why do we collect it?

We take the privacy of any data subjects with whom we engage very seriously and we only collect and process Personal Information for specific purposes which are connected to our legitimate business purposes, which we generally need in order to comply with our obligations towards you and also to comply with obligations which are imposed upon us in terms of applicable laws regulating us. The Personal Information you provide to Academy of York pursuant to your Academy of York Dealing is typically processed for the following purpose(s), which purposes are connected to our legitimate business purposes:

- To provide or manage any information, products and/or services requested by you pursuant to your Academy of York Dealing.
- To evaluate whether or not to offer, extend or modify any offering or services requested by, or provided to, you.
- Using, processing, sharing/transferring or engaging in analytics of your Personal Information for (i) routine business purposes; or (ii) the purposes of new business or product development.
- To establish your needs, requirements and preferences in relation to the products and/or services provided by Academy of York.
- To identify your risk profile and make an election as to whether we wish to enter into a contractual relationship with you and if so, on what terms.
- To allocate unique identifiers to you for the purpose of processing your Personal Information, securely storing, retaining, and recalling your Personal Information from time to time, regardless of whether you conclude an agreement with Academy of York .
- For general administration purposes pertaining to your request/s and to reply to you when you contact us for support.



- To improve the quality of Academy of York 's products and services.
- To analyse your Personal Information collected for research and statistical purposes.
- To transfer your Personal Information across the borders of South Africa to other jurisdictions should it be required in the legitimate pursuit of Academy of York 's business requirements.
- To identify products and services which might be of interest to you, as well as to inform you of such products and/or services.
- To investigate and attempt to resolve any queries, complaints or requests.
- To verify that the personal information provided is true and accurate.
- To, unless you expressly "opt out", process your Personal Information as defined above for the purposes of direct marketing and advertising to you of products and services provided by Academy of York in future.
- To, for the purposes of enhancing the scope of products and services we can offer to you or the method of delivery, share or transfer all or any part of your Personal Information to a third party who is a potential business partner or actual provider/supplier of outsourced services to us.
- To, at any time procure or share information relating to your credit worthiness and risk profile from or with any registered credit bureau or credit provider's industry association or industry body, which includes information pertaining to your credit history, financial history, judgements, default history and sharing information for purposes of risk analysis, tracing and related purposes.

This notice applies to all data (including all Personal Information) past, present or future submitted by you to Academy of York or which we otherwise obtain pursuant to undertaking our normal business activities. In supplementation of the above purposes, we are legally required to collect and process certain personal information for very specific purposes, such as:



- verifying the identity of the User;
- transmitting and receiving necessary correspondence to the User in relation to the Services or the Products or Services accessed, used or purchased by the User through, or by means of the Website;
- facilitating delivery of the Services or the Products or services accessed, used or purchased by, or subscribed to by, the User through, or by means of the Website;
- generally rendering the Services;
- processing payments, refunds and the like in respect of any of the Services or the Products or services accessed, used or purchased by the User through, or by means of the Website;
- transmitting marketing material to the User in respect of the Services and/or Products made available by the Provider or any third party;
- to monitor and analyse the User's conduct in respect of the Services and/or Products;
- for compliance and risk purposes;
- to analyse the Personal Information collected for research and statistical purposes and once such Personal Information is analysed to send the User marketing and promotional material which the Provider believes may, based on the Provider's processing of the User's Personal Information, be relevant to the User and enhance the User's use of the Services and/or Products provided on, through, or by means of the Website;
- to transfer the User's Personal Information to any relevant third party, such as any company associated with or affiliated to the Provider, as well as any third party service provider such as the provider of the Online Portal(s) licenced by the Provider;
- to conduct market research, as well as academic research in respect of the Personal Information in order to identify potential markets and trends, to develop new products and services and to improve the nature of the Services and/or Products being provided to the User by the Provider;
- to aggregate and/or de-identify the User's Personal Information after analysing it for statistical purposes and/or conducting market and academic research in respect thereof, as aforesaid, and transferring or on-selling such de-identified Personal Information to third parties for commercial or non-commercial means.

Who do we share your Personal Information with?

For us to maintain the high standards of product and service delivery you have come to appreciate, we are required to share your personal information with some of our suppliers, service providers and business partners. We use service providers and suppliers who we



trust, who we have agreements with and they have agreed to keep your personal information secure and confidential, and to only use it for purposes which we have agreed to. If you are interested in who these service providers are, you can view our website, but a few of the key service providers are:

- SABPP
- ICB
- Real Pay
- ABSA and Nedbank
- Obami
- Majestic
- Teleforge
- Couriers
- Sage

These aren't all our service providers and suppliers, and if you want to find out more, we will be happy to share these details with you. We may also from time to time provide you with links to their individual privacy notices and policy documents.

So that you are fully made aware, please note that we do use service providers in order to:

- SABPP – An Accreditation body for HR and Labour relations qualifications. Hr and Labour Relations student information is stored on the SABPP National Learner Record Database for moderation and issuing of certificates.
- ICB – We help our students to register on the ICB portal to receive a reference number which is used to access assignments and booking exams. We report back to ICB whenever we register new students.
- Real Pay – Debt order management system, personal and banking information is loaded on the Real Pay platform to process our students debit orders.
- ABSA and Nedbank , South African major banks who provide student loans
- Obami is an online study portal for our students



- Majestic – is a CRM application which we use to communicate with our students and as a database.
- Teleforge – our telephony system
- Couriers – Courier out student course material
- Sage – Billing system

Where do we store your Personal Information?

All your personal information is stored securely by Academy of York through Cloud based Databases(Majestic) and Servers, original paper based documents are stored in secure storeroom and in our office. In storing your Personal Information, we may transmit or transfer Personal Information outside South Africa to a foreign country, as such, personal information may be stored on servers located outside of South Africa in foreign countries that have different data protection laws in place. We are comfortable that these foreign countries protect Personal Information to an extent that compares to the way in which we do, which is acceptable to us. If you are interested in who these suppliers are, you are welcome to ask us at anytime, we will happily disclose this information to you upon request.

What are your Rights?

It is important that you know what your rights are with regards to our processing of your personal information and we want to make this clear to you also. Although we take steps to safeguard your personal information, process it lawfully and only share it with suppliers and service providers we trust, you have the following rights:

- You can ask us at anytime what personal information of yours we hold – **we don't have any hidden agenda here!**
- You can ask us what personal information of yours is, or was, shared with any of our suppliers, service providers, or any third party for that matter – **we will happily tell you!**



- You can ask us to update your personal information or even delete any information which is no longer accurate – **we want to make sure your information is accurate and complete, but we need your help!**
- You can object to our processing of your personal information – **we don't want to process your information if you don't want us to, but just bear in mind it may influence our ability to fulfil our obligations towards you!**
- You are more than welcome to lodge a complaint with the information regulator if you feel that we are not complying with POPIA – **please do try and speak to us first, but this is a remedy available to you and we want you to know about it!**

The contact details of the Information Regulator are:

The Information Regulator (South Africa)
JD House 27 Stiemens Street Braamfontein Johannesburg, 2001
PO Box 31533
Braamfontein, Johannesburg, 2107
E-mail: inforeg@justice.gov.za

With that said, we have (and continue to) implement reasonable security measures and protocols to protect the personal information we hold. These measures are to protect any personal information we hold from being disclosed without authorisation, from loss, damage, destruction or unauthorised access. As you will appreciate nothing is 100% secure in this day and age and therefore, we ask that if you suspect that either you, or we, have had an information security breach, please notify us immediately so that we can take action. You can do so by contacting our Information Officer whose information is set out below. If you need to speak with our Information Officers, feel free to contact them. Our Information Officer is Richard Leeming and the Deputy Officers are Janene Hulse and Hamu Chigoma and any queries or even questions you may have regarding this privacy notice and Academy of York 's POPIA compliance efforts can be directed to them at popi@aoy.co.za