

CLOSING THE DIGITAL DIVIDE TECHNICAL INSTITUTION PRIVACY POLICY

CDDTI promotes a non-discriminatory, conducive environment for all stakeholders and provides transparent, accountable, risk-based approaches to ensure the safeguarding of privacy of their personal information. The Privacy Policy details how CDDTI protects your privacy and how it complies with the requirements of the South African Data Privacy Laws, as guided by the Protection of Personal Information Act, 2013 (POPIA).

1. Your Privacy is Vital

1.1. The Use and Management of Personal Information

This statement delineates the policy adopted by CDDTI on how the institution uses and manages personal information provided to or collected by it.

1.2. Compliance with Protection of Personal Information Act

CDDTI is bound by the Protection of Personal Information Act of South Africa.

1.3. Policy Review and Updates

The institution may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Institutions' operations and practices, and to ensure it remains appropriate for the changing institution environment.

2. What Kind of Personal Information does the Institution Collect and How Does the Institution Collect it?

2.1. Types of Information Collected

The type of information the institution collects and holds include (though not limited to) personal information, including sensitive and health information, about:

- Students and parents and/or guardians before, during, and after the course of a student's enrollment at the institution.
- Job applicants, staff members, volunteers, contractors, and
- Other people who meet with the institution.

Personal information may be defined as information or an opinion about a person that may identify a person. Sensitive information may be defined as personal information given extra protection and treated with extra care. This may include information about race, political opinions, religious beliefs or associations, membership of professional associations or unions, sexual orientation, and health records.

2.2. Methods of Collection

- ***Personal information you provide:*** The Institution will generally collect personal information held about an individual through forms filled out by parents or students, face-to-face meetings and interviews, and telephone. On occasions, people other than parents and students provide personal information.

- ***Personal information provided by other people:*** In some circumstances, the Institution may be provided with personal information about an individual from a third party, for example, a report provided by a medical professional or a reference from another institution. Sometimes, we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information.” Where we collect unsolicited information, we will only hold, use, and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means, then we will destroy, permanently delete, or de-identify the information as appropriate.

3. How will CDDTI use the Personal Information you Provide?

The Institution will use personal information it collects from you for the primary purpose of collection and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected or to which you have consented.

3.1. Students and Parents

In relation to personal information of students and parents, the Institution’s primary purpose of collection is to enable the Institution to provide learning services that satisfy the needs of both parents and students throughout the whole period the student is enrolled at the Institution.

Purposes for which the Institution uses Personal Information of Students and Parents Include:

- To keep parents informed about matters related to their child through correspondence, newsletters, and magazines.
- Day-to-day administration.
- Looking after students' educational, social, spiritual, and medical well-being.
- Seeking donations and marketing for the Institution.
- To satisfy the institution's legal obligations and allow the Institution to discharge its duties.

3.2. Enrolment Requirements

In some cases where the Institution requests personal information about a student or parent, if the information requested is not obtained, the Institution may not be able to enrol or continue the enrolment of the student.

3.3. Job Applicants, Staff members, and Contractors

In relation to personal information of job applicants, staff members, and contractors, the Institution's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member, or contractor.

Purposes for which the Institution uses Personal Information of Job Applicants, Staff Members, and Contractors Include:

- In administering the individual's employment or contract.
- For insurance purposes.
- Seeking funds and marketing for the institution.

3.4. Volunteers

The institution also obtains personal information about volunteers who assist the Institution in its functions or conduct and associated activities, such as Alumni organizations or Parents and Friends Associations, to enable the institution and the volunteers to work together.

3.5. Marketing and Fundraising

The Institution treats marketing and seeking donations for the future growth and development of the institution as an important part of ensuring that the institution continues to be a quality learning environment for both students and staff. Personal information held by the institution may be disclosed to an organization that assists in the Institution's fundraising.

Disclosure of Personal Information for Marketing Purposes

Parents, staff, contractors, and other members of the wider institution community may from time to time receive fundraising Institution publications, like newsletters and magazines, which include personal information, and may be used for marketing purposes. The Institution may disclose this information to any of those mentioned above where another permitted general situation or permitted health situation exception applies.

4. Who Might CDDTI Disclose Personal Information to?

4.1. Recipients of Personal Information

The Institution may disclose personal information, including sensitive information, held about an individual to:

- Another institution.
- Government departments.
- Medical practitioners.
- People providing services to the Institution, including visiting teachers and sports coaches.
- Recipients of institution publications, like newsletters and magazines.
- Parents and
- Anyone you authorize the Institution to disclose information to anyone to whom we are required to disclose information to by law.

4.2. Sending Information Overseas

The Institution will not send personal information about an individual outside South Africa without:

- Obtaining the consent of the individual or
- Otherwise complying with the South African Data Privacy Laws.

The Institution may also store information in the “cloud” which may mean that it resides on servers that are situated outside South Africa.

5. How Does CDDTI Treat Sensitive Information?

5.1. Definition of Sensitive Information

In referring to 'sensitive information', the Institution means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences, or criminal record, that is also personal information, and health information about an individual.

5.2. Use and Disclosure of Sensitive Information

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

6. Management and Security of Personal Information

6.1. Staff Confidentiality

The institution's staff are required to respect the confidentiality of students' and parents' personal information and the privacy of individuals.

6.2. Security Measures

The Institution has in place steps to protect the personal information the Institution holds from misuse, loss, unauthorized access, modification, or disclosure by the use of various methods, including locked storage of paper records and passworded access rights to computerized records.

7. Updating Personal Information

7.1. Accuracy and Completeness

The Institution endeavors to ensure that the personal information it holds is accurate, complete, and up to date.

7.2. Updating Process

A person may seek to update their personal information held by the institution by contacting the institution at any time.

7.3. Data Retention

CDDTI strives not to store personal information longer than necessary.

8. You Have the Right to Check what Personal Information the Institution holds about you.

8.1. Right of Access

Under the Protection of Personal Information Act of South Africa, an individual has the right to obtain access to any personal information, which the Institution holds, about them and to advise the Institution of any perceived inaccuracy.

8.2. Exceptions to Right of Access

There may be some exceptions to this right set out in the Act:

- Students will generally have access to their personal information through their parents, but older students may seek access themselves.
- To make a request to access any information the institution holds about you or your child, the Institution's Principal should be contacted in writing.
- The institution may require you to verify your identity and specify what information you require.
- The institution may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing, and copying any material. If the information sought is extensive, the institution will advise the likely cost in advance.

9. Consent and Rights of Access to the Personal Information of Students

9.1. Parental Consent

The Institution respects every parent's right to make decisions concerning their child's personal information.

9.2. Consent Referral

Generally, the Institution will refer any requests for consent and notices in relation to the personal information of a student to the respective student's guardian or parent. The Institution will treat

consent given by parents as consent given on behalf of the student and notice to parents will act as notice given to the student.

9.3. Student's Access Rights

Parents may seek access to personal information held by the institution about them or their child by contacting the institution. However, there will be occasions when access is denied. Such occasions would include:

- Where release of the information would have an unreasonable impact on the privacy of others or
- Where the release may result in a breach of the institution's duty of service to the student.

9.4. Student's Independent Access

The Institution may, at its discretion, on the request of a student grant that student access to information held by the Institution about them or allow a student to give or withhold consent to the use of their personal information, independently of their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

10. Enquiries and Complaints

The Institution welcomes your feedback. If you would like further information regarding the way CDDTI manages the personal information it holds or wish to complain that you believe CDDTI has breached the South African Privacy principles, please contact the Institution Administration Staff by email at

[info@cddti.com](mailto:info@cddti.com) or telephone +27 11 568 7971. CDDTI will investigate any complaint and will notify you of a decision in relation to your complaints as soon as practicable after it has been made.

****Policy Updated On:**** January 2024

****Date of Next Formal Review:**** January 2025