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**GRATTON COLLEGE  
PROTECTION OF PERSONAL INFORMATION  
POLICY**

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## NOTICE:

By accessing, using and/or interacting with Gratton College via its Platforms the Data Subject consents to the Processing their Personal Information by Gratton College. The Processing of Personal Information will be done in accordance with this Policy. Should a Data Subject not consent, the Data Subject must cease its interaction with Gratton College on any and every Platform.

## 1. SCOPE

- 1.1. Gratton College is obliged to inform its Data Subjects as to how their Personal Information is used, disclosed, and destroyed.
- 1.2. Gratton College guarantees its commitment to protecting its Data Subjects' privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.

## 2. DEFINITIONS

- 2.1. "Consent" means any voluntary, specific, and informed expression of will in terms of which permission is given by or on behalf of the Data Subject for the Processing of their Personal Information.
- 2.2. "Cookies" means small text files transferred by a webserver to the Data Subjects' hard drive and thereafter stored on their computer. The types of information a Cookie collects includes Usernames, date, and time of visits to the Platform, browsing history and preferences.
- 2.3. "Data Subject(s)" bears the same meaning as defined in POPIA.
- 2.4. "De-identify" and "De-identified" in relation to Personal Information of a Data Subject, means to delete any information that— (a) identifies the Data Subject; (b) can be used or manipulated by a reasonably foreseeable method to identify the Data Subject; or (c) can be linked by a reasonably foreseeable method to other information that identifies the Data Subject.
- 2.5. "Direct Marketing" means to approach a Data Subject, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply any goods or services to the Data Subject.
- 2.6. "Gratton College" means Gratton College, a school whose principal place of business is at Old Eshowe Showgrounds, Ntumeni Road, Eshowe, KwaZulu Natal.
- 2.7. "ID" means Identification Document.
- 2.8. "Information Officer" means the information officer appointed by Gratton College in accordance with POPIA.



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- 2.9. "Operator(s)" means an outside third party who Processes Personal Information for or on behalf of Gratton College in terms of a contract or mandate.
- 2.10. "PAIA" means the Promotion of Access to Information Act 2 of 2000.
- 2.11. "Person" means a natural person and/or a juristic person.
- 2.12. "Personal Information" is all information that relates to an identifiable Data Subject. It carries the same definition as Personal Information contained in POPIA.
- 2.13. "Platform(s)" means any means by which a Data Subject can interact with Gratton College, including its Site, related websites, applications, social media, mails and by way of telephone.
- 2.14. "POPIA" means the Protection of Personal Information Act 4 of 2013, including any regulations or codes of conduct promulgated under same.
- 2.15. "Process" or "Processing" bears the same meaning, in relation to Personal Information, as defined in POPIA.
- 2.16. "This Policy" means this Protection of Personal Information Policy.
- 2.17. "Site" means the website or any part thereof which is accessible at [www.gratton.co.za](http://www.gratton.co.za).
- 2.18. "User" means any person, natural or juristic, accessing, viewing and or using the Site.

### **Interpretation:**

In this Policy, any reference to:

- the singular includes the plural and vice versa.
- any one gender includes the other genders, as the case may be;
- an act, regulation or other law is to the version of that law in force at the effective date of this Policy and includes any amendment or re-enactment made to that law after the effective date of this Policy;
- A requirement that any notice, request, demand, or other communication made in terms of this Policy must be in writing will be met if it is in the form of a data message as defined in the ECTA and is accessible in a manner usable for subsequent reference. The User agrees their chosen domicile will be as per their indicated email address.
- This Policy shall be governed and interpreted in accordance with the laws of the Republic of South Africa.
- Any other words used in this Policy which are defined in POPIA carries the same meaning in this Policy as in the Act.



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### 3. OBJECTIVES

- 3.1. In providing services to Data Subjects, Gratton College collects, uses, Processes and, in some circumstances, shares the Personal Information of Data Subjects in and through its Platforms.
- 3.2. Gratton College respects the rights of such Data Subjects, whose Personal Information is collected, used and/or processed by it, including their right to protection against the unlawful collection, retention, sharing and use of such Personal Information.
- 3.3. The purpose of this Policy is to provide Data Subjects with information about the Processing activities of Gratton College and the way Data Subjects' rights are protected.
- 3.4. This Policy relates to each interaction between a Data Subject and Gratton College.
- 3.5. Gratton College may amend the provisions of this Policy to comply with any changes in the law, and/or pursuant to any changes to its information Processing activities or privacy practices. Such amendments will be published on the Site and will become operable from the date of such publication.

### 4. RESPONSIBLE PARTY

- 4.1. Gratton College will be the party who will collect and Process the Data Subjects' Personal Information and as such is designated as the "Responsible Party" in terms of POPIA and for the purposes of this Policy.
- 4.2. Gratton College's contact details are as follows:  
Physical address: Old Eshowe Showgrounds, Ntumeni Road, Eshowe, KwaZulu Natal  
Telephone number: +27 74 145 5023  
Site address: [www.gratton.co.za](http://www.gratton.co.za)
- 4.3. Gratton College may instruct Operators from time to time to undertake certain Processing activities relating to the Data Subjects' Personal Information.

### 5. DATA AND/OR PERSONAL INFORMATION

- 5.1. Gratton College may collect the following data and/or Personal Information from the Data Subject:
  - 5.1.1. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the Data Subject;
  - 5.1.2. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other assignment to the Data Subject;
  - 5.1.3. The personal opinions, views, or preferences of the Data Subject;



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- 5.1.4. Correspondence sent by the Data Subject that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - 5.1.5. The views or opinions of another individual about the Data Subject;
  - 5.1.6. The name of the Data Subject as it appears with other Personal Information relating to the Data Subject; and
  - 5.1.7. Any other Personal Information that may be provided by the Data Subject to Gratton College or obtained by Gratton College or required by Gratton College in relation to the provision of the services of Gratton College to the Data Subject.
- 5.2. Gratton College may collect and/or use Cookies on its Platforms to:
    - 5.2.1. distinguish one Data Subject from another on its Platforms;
    - 5.2.2. remember the Data Subject's last session when the Data Subject returns to the Platforms;
    - 5.2.3. estimate the Platform's audience size and usage patterns;
    - 5.2.4. store information about the Data Subject's preferences, which allows Gratton College to customise the Platforms and content according to the Data Subject's individual preferences; and
    - 5.2.5. speed up searches on the Platforms.
  - 5.3. The provisions of clause 5.2 are only applicable to Cookies used by Gratton College. In some instances, third-party service providers may use Cookies on the Platforms in which case Gratton College shall not be held liable or be responsible for the protection of the Data Subject's Personal Information.
  - 5.4. A Data Subject has the right and ability to either accept or decline the use of Cookies on its electronic device's web browser, whether the Data Subject is logged in as a User, or simply casually visiting the Platform. However, declining the use of Cookies may limit the Data Subject's access to certain features on the Platforms.
  - 5.5. The supply of Personal Information by a Data Subject to Gratton College is voluntary and not mandatory. However, should the Data Subject refuse to supply any Personal Information, certain consequences may be applicable in such instances, such as preventing Gratton College from concluding or performing any contract with the Data Subject or preventing Gratton College from complying with one or more of its obligations in law.

## 6. PURPOSE/S OF COLLECTION AND PROCESSING OF PERSONAL INFORMATION

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Members: The Zulufadder Children's Trust NPC, Mari Maurstad (Norwegian), Silvia Hellesvik (Norwegian),  
Rev Mandla Zulu



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- 6.1. Gratton College shall only collect and Process the Data Subject's Personal Information for a specific, explicitly defined, and lawful purpose relating to a function or activity of Gratton College business.
  - 6.2. Such purposes may include the following:
    - 6.2.1. To provide educational and related services;
    - 6.2.2. To perform any obligations under a contract with the Data Subject;
    - 6.2.3. To comply with a legal obligation;
    - 6.2.4. To protect a legitimate interest of the Data Subject (unless the Data Subject has specifically objected in writing to all or some of the Processing activities on reasonable grounds);
    - 6.2.5. To pursue its own legitimate interests or the legitimate interests of a third party whom it is sharing the information with (unless the Data Subject have specifically objected in writing to all or some of the Processing activities on reasonable grounds);
    - 6.2.6. To Process Personal Information for direct marketing purposes (unless the Data Subject has opted out of receiving any direct marketing material);
    - 6.2.7. To present content to the Data Subject in the most effective way for the Data Subject and the Data Subject's viewing device and browser;
    - 6.2.8. To customise and display content including, but not limited to products, articles, listings, and advertisement to the Data Subject in a way that Gratton College believes may interest the Data Subject or be most beneficial to the Data Subject;
    - 6.2.9. To send content including, but not limited to products, articles, listings, and advertisement content to the Data Subject via email or other electronic media, where the Data Subject have consented to be contacted by Gratton College with such content;
    - 6.2.10. To enable the Data Subject to voluntarily participate in interactive features on the Site;
    - 6.2.11. To notify the Data Subject about changes to its Platforms; and/or
    - 6.2.12. To contact the Data Subject regarding their contracts concluded through the Site.
  - 6.3. Gratton College will not sell the Data Subjects' Personal Information to any third party without the prior written consent of the Data Subject.

## 7. METHOD OF COLLECTION

- 7.1. Gratton College shall, as far as possible, always collect Personal Information about the Data Subject directly from the Data Subject, except in the following circumstances:
  - 7.1.1. where Personal Information is collected from a public record, or from another source if the information has already been made public by the Data Subject;





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- 7.1.2. where the Data Subject has given their written consent to Gratton College to collect the Data Subjects' information from another source;
  - 7.1.3. where the collection of the Data Subjects' Personal Information from another source will not prejudice any of the Data Subjects' legitimate interests;
  - 7.1.4. where the collection of Personal Information from another source is necessary to maintain Gratton College legitimate interests or those of any third party it intends sharing the information with;
  - 7.1.5. where the collection of Personal Information directly from the Data Subject would prejudice and/or defeat the purpose for the collection; and
  - 7.1.6. where the collection of Personal Information directly from the Data Subject is not reasonably practicable in the circumstances.
  - 7.2. If Gratton College collects Personal Information from a source other than the Data Subject, it shall record in writing the details of that source, including the full names and contact details of that source where applicable.
  - 7.3. Personal Information may be collected from or supplied by the Data Subject in any of the following ways:
    - 7.3.1. when subscribing to a service, entering a competition or promotion, or participating in a survey offered on its Platforms;
    - 7.3.2. when posting a comment, review, reply or recommendation its Platforms;
    - 7.3.3. when requesting further services or information from Gratton College and/or other Users of the Site;
    - 7.3.4. when contacting Gratton College to report a problem with a Gratton College Platform or for any other reason; and
    - 7.3.5. when completing any forms on a Gratton College Platform.
  - 7.4. The Data Subject may visit a Platform without providing any Personal Information. However, the Sites servers may still collect technical information regarding the use of the Site, which is aggregated for analytical purposes, technical maintenance and for improving the content offered on the Site. Such information may include details of the Data Subject's visit, information about the Data Subject's electronic device, including IP (Internet Protocol) address, operating system and browser type, the Data Subject's location, and usage information.
  - 7.5. Where a Data Subject will not be identified from or by this information, in clause 7.4, Gratton College is entitled to copy, distribute, or otherwise use such information without limitation.

## 8. COMPLIANCE WHEN PROCESSING PERSONAL INFORMATION

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- 8.1. Gratton College shall comply with all laws, contracts and/or regulations when it Processes the Data Subject's Personal Information.
- 8.2. Gratton College shall not act outside the limitations set by law and this Policy when Processing the Data Subject's Personal Information. This means that it will collect and Process the Data Subject's Personal Information in a way that is fair and reasonable.
- 8.3. Gratton College shall always respect the Data Subject's right to privacy. If there is another method in which it can achieve the same goal without posing any risk of harm to the Data Subject's privacy rights, then it will follow same.
- 8.4. Similarly, if Gratton College is required to Process Personal Information and there are less privacy-invasive methods of collecting, using, and sharing same, then it will implement said methods.
- 8.5. Not derogating from the above, the Data Subject agrees that the Personal Information collected by Gratton College on its Platforms are necessary and rationally required by Gratton College.
- 8.6. Gratton College shall ensure that the Personal Information that is collected and processed is and remains relevant to the identified purpose/s for such Processing, and that such information is and remains adequate, but not excessive, for achieving the identified purpose/s.
- 8.7. If there are any alternative ways to achieve the identified purpose/s without Processing Personal Information, Gratton College shall not Process that Personal Information.
- 8.8. Gratton College shall ensure that the Processing activities it implements are proportionate to achieving the identified purpose/s and that no less privacy invasive measures are available to achieve the same purpose/s.
- 8.9. Gratton College shall ensure that, regardless of the stated purpose/s for Processing Personal Information, the rights and interests of Data Subjects will not be unnecessarily prejudiced or infringed, unless it cannot be avoided, and then in such case, it shall ensure that its own rights and/or interests justify such prejudice or infringement taking place.
- 8.10. Once Gratton College has achieved the purpose for the collection of the Data Subject's Personal Information, it will destroy or delete such information, unless the Data Subject has directed otherwise in writing, or Gratton College is required by law to retain the information for a longer period.
- 8.11. If Gratton College is no longer required to Process Personal Information to achieve the purpose originally specified, it will cease to Process that information.

## 9. DISCLOSURE OF INFORMATION





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- 9.1. Gratton College may, while providing any content or services on its Platforms, or for the purposes of concluding or performing any transaction with the Data Subject, share certain Personal Information with Operators who perform specific Processing activities on behalf of Gratton College.
- 9.2. The categories of Operators with whom it is shared is set out below:
- 9.2.1. Banks or other financial institutions where the Data Subject maintains or has maintained bank accounts, loan accounts and/or other financial portfolio accounts;
  - 9.2.2. Service providers who provide Gratton College with legal assistance, accounting or auditing services, payroll services and/or other services utilised to effectively operate the Gratton College business;
  - 9.2.3. Delivery and courier service providers;
  - 9.2.4. Payment gateway provider;
  - 9.2.5. Bulk email delivery providers; and
  - 9.2.6. Any other service provider employed by Gratton College to achieve its purposes.
- 9.3. Gratton College may also share aggregated information about the Data Subject, and its usage patterns. Gratton College may also use such aggregated information to help advertisers target specific audiences. Such aggregated information will be de-identified, and the Data Subject's Personal Information will not be disclosed.
- 9.4. Other than as stated in this clause, Gratton College shall not share the Data Subject's Personal Information with any third parties unless it has the Data Subject's express consent to do so.

## 10. DATA SUBJECT'S RIGHTS

- 10.1. The Data Subject shall have the following rights in relation to the Processing of their Personal Information:
- 10.1.1. to access and correct any Personal Information held by Gratton College about them;
  - 10.1.2. to object to the Processing of their information; and
  - 10.1.3. to lodge a complaint with the Information Regulator.
- 10.2. The Data Subject may make a request in relation to this clause by following the Process as set out in Gratton College PAIA manual or by making a request to the designated email address and person listed herein.

## 11. FURTHER PROCESSING

- 11.1. Gratton College shall not Process the Data Subject's Personal Information for any purpose not previously specified except in the following circumstances:
- 11.1.1. where the Data Subject has consented to such further Processing;



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- 11.1.2. where the further Processing is necessary for the exercise of any contractual rights the fulfilment of any obligations between Gratton College and the Data Subject;
- 11.1.3. where the further Processing activities are linked to or compatible with the original purpose;
- 11.1.4. where the further Processing is necessary for the prevention, detection, investigation, prosecution, and punishment of an offence;
- 11.1.5. where the further Processing is necessary to enforce any law;
- 11.1.6. where the further Processing is necessary for the conduct of legal proceedings in any court or tribunal that have commenced or are reasonably contemplated;
- 11.1.7. where the further Processing is necessary to prevent or mitigate a serious and imminent threat to the life or health of the Data Subject or another individual;
- 11.1.8. where the further Processing is necessary for historical, statistical or research purposes.

11.2. Gratton College shall ensure that if it intends Processing Personal Information for other purposes not previously specified, it shall notify the Data Subject of such further purposes and the possible consequences of the intended further Processing for the Data Subject.

## **12. ACCURACY, CORRECTNESS, AND COMPLETENESS OF PERSONAL INFORMATION**

- 12.1. Gratton College shall take reasonably practicable steps to ensure that the Personal Information kept by it about the Data Subject is complete, accurate, not misleading and is updated when necessary.
- 12.2. However, if the Data Subject is aware of any Personal Information in Gratton College custody that is incorrect, inaccurate or which needs to be updated, the Data Subject must make a written request to Gratton College information officer at [bursar@gratton.co.za](mailto:bursar@gratton.co.za) to update or correct the relevant information.
- 12.3. If the Data Subject has contested the accuracy of any Personal Information being used by Gratton College, it shall immediately stop using that information until its accuracy has been verified.
- 12.4. Gratton College reserves its right to only adhere to a request from the Data Subject in terms of this clause if the correction or updating of that information will result in the personal Information being correct and accurate.
- 12.5. Where Personal Information that has been shared by Gratton College with a third party is subsequently updated or corrected, Gratton College shall ensure that all third parties, with whom that information was shared and is still utilising such information at that point in time, receives the updated and/or corrected version of the information as soon as it has been updated and/or corrected.



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### 13. SECURITY SAFEGUARDS

- 13.1. Gratton College is committed to protecting the Personal Information in its custody against any loss of, damage to or unauthorised destruction of that information, and to prevent any unauthorised parties from accessing that information.
- 13.2. Gratton College takes steps to continually identify and document any risks to the Personal Information it has in its possession or under its control and that appropriate security safeguards are in place against those risks.
- 13.3. Gratton College shall ensure that in any contracts entered with Operators who Process Personal Information on its behalf, include the following obligations:
  - 13.3.1. the Operator shall not Process any Personal Information without Gratton College knowledge and authority;
  - 13.3.2. the Operator shall treat all Personal Information given to it as confidential and shall not disclose it to any unauthorised third parties;
  - 13.3.3. the Operator shall establish and maintain adequate security measures which are the same or offer similar protection over the Personal Information as that employed by Gratton College;
  - 13.3.4. the Operator shall notify Gratton College immediately where there are reasonable grounds to believe that any Personal Information has been leaked to or accessed by any unauthorised person;
  - 13.3.5. if the Operator is situated in another country, it must comply with the data protection laws in that country, in addition to complying with the provisions of POPIA, and be able to provide verification that it is so compliant;
  - 13.3.6. if an Operator is legally obliged to disclose any Personal Information Processed by them on Gratton College behalf to other parties, it must notify Gratton College beforehand to enable Gratton College and/or the Data Subject to protect the Data Subject's rights if necessary.
- 13.4. The Data Subject must maintain the secrecy of any passwords used to gain access to its Platforms and the Data Subject should change such passwords regularly.
- 13.5. Gratton College shall ensure that all Personal Information on its systems is properly backed-up and that back-up copies are stored separately from the live files.
- 13.6. As the internet is not a secure medium of communication, Gratton College cannot guarantee the security of any information the Data Subject may create, input, or share on its Platforms or send to Gratton College via the internet. Gratton College is not, and will not be, responsible for any damages the Data Subject or others may suffer because of the loss of confidentiality of any such information.



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#### **14. NOTIFICATION OF BREACH OF SECURITY**

- 14.1. If Personal Information about the Data Subject is inadvertently leaked or Gratton College security has been unlawfully breached by any unauthorised party, Gratton College shall immediately identify the relevant Users who may be affected by the security breach and shall contact them at their last known email address or contact details or by the quickest reasonable means possible.
- 14.2. Gratton College shall provide sufficient information to the Data Subject to allow the Data Subject to take the necessary protective measures against the potential consequences of the compromise or shall advise the Data Subject of the steps to be taken by the Data Subject and the possible consequences that may ensue from the breach for the Data Subject.

#### **15. DECISIONS BASED ON PERSONAL INFORMATION PROCESSED**

- 15.1. If Gratton College is required to decide about the Data Subject using any Personal Information that has been obtained, it shall ensure that a record of such information and the decision made is kept for a reasonable period to give the Data Subject an opportunity to request access to that record.
- 15.2. Gratton College may allow the Data Subject a reasonable opportunity to make representations, before any decision is made solely based on the Personal Information Processed, if that decision will affect the Data Subject's legal position or will otherwise adversely affect the Data Subject in some manner or form.
- 15.3. Gratton College shall always ensure that, the underlying logic behind any decision made pursuant to the automated Processing of Personal Information, is sound, and that this underlying logic may be able to be communicated to the Data Subject, to enable the Data Subject to make representations.
- 15.4. If Gratton College has decided based on incorrect Personal Information, it shall immediately revisit that decision as soon as it receives notice or becomes aware of the error or inaccuracy of such information.

#### **16. LINKED THIRD PARTY SITES**

- 16.1. Gratton College Platforms may contain links or references to other websites, including those of advertisers ("third party sites") which are not under Gratton College control.
- 16.2. The provisions of this Policy are not applicable to third party sites and Gratton College shall not be responsible for the information Processing practices and/or privacy policies of those third-party sites, or the Cookies that those websites may use.



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## 17. DIRECT MARKETING

- 17.1. The Data Subject hereby consents to the Processing of the Data Subject's Personal Information for the purpose of direct marketing by means of electronic communications including automatic calling machines, facsimile machines, SMSs, or electronic mail.
- 17.2. Where the Data Subject is a pre-existing customer of Gratton College, the School shall be entitled, without the Data Subject's consent, to send electronic communications to the Data Subject for the purpose of marketing similar products or services offered by Gratton College.
- 17.3. The Data Subject may object, free of charge, and without unnecessary formality, to the use of their details either when the information was first collected from the Data Subject or when each subsequent electronic communication is sent to the Data Subject by Gratton College and/or its subsidiaries.
- 17.4. The Data Subject can opt out of receiving further marketing communications by un-checking certain boxes on the forms used on the Site to collect their Personal Information, or by contacting Gratton College at [bursar@gratton.co.za](mailto:bursar@gratton.co.za).

## 18. CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

- 18.1. Subject to the clauses set out in this Policy, Gratton College does not intend on sharing the Data Subject's Personal Information with a third party in another country.
- 18.2. Gratton College may transfer Personal Information to another country in the following circumstances, to which the Data Subject consents:
  - 18.2.1. the transfer is necessary for the performance of a contract that Gratton College has with the Data Subject, or the performance of services offered by Gratton College to the data Subject;
  - 18.2.2. the transfer is necessary for the implementation of pre-contractual measures taken in response to the Data Subject's request;
  - 18.2.3. the transfer is necessary for the conclusion or performance of a contract with a third party which is for the benefit of or in the interest of the Data Subject;
  - 18.2.4. the transfer is otherwise for the benefit of the Data Subject;
  - 18.2.5. the Data Subject have consented to the transfer of its information; or
- 18.3. The service providers to which Gratton College is contracted to process the Data Subject's Personal Information, in terms of this Policy/or any other Gratton College agreement, have the right to electronically transmit the Data Subject's Personal Information via a secure connection to, and store the Data Subject's Personal Information electronically in, a secure



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database hosted outside South Africa, provided they have security and privacy policies and procedures providing at least the same level of protection as Gratton College does.

## **19. RETENTION OF INFORMATION**

- 19.1. Gratton College will keep a record of any Personal Information collected for no longer than is necessary to achieve the specific purpose for which it collected such information in the first place unless:
- 19.1.1. it is required by law to keep a record of such information for a longer period; or
  - 19.1.2. it needs to keep a record of such information for another lawful purpose; or
  - 19.1.3. it has a contractual obligation to keep a record of such information; or
  - 19.1.4. the Data Subject has consented to their information being kept for a longer period.
- 19.2. Gratton College may, if it has de-identified Personal Information, keep such information for historical, statistical or research purposes. Gratton College shall ensure that appropriate safeguards are in place to prevent those records from being used for any other purposes, or against the information being re-identified.

## **20. INFORMATION SECURITY**

- 20.1. Gratton College information and communication technologies and systems are critical to its operations. The reliance on such technologies and information (data) housed in such technologies are important to it.
- 20.2. These security measures are subject to the service providers undertaking to maintain the confidentiality of any Personal Information as defined in POPIA.
- 20.3. Gratton College is legally obliged to provide adequate protection for the Personal Information it holds and to stop unauthorised access and use of Personal Information. Gratton College, on an ongoing basis, continues to review its security controls and related processes to ensure that its Data Subject's Personal Information is secure.
- 20.4. When Gratton College contracts with third parties, it imposes appropriate security, privacy, and confidentiality obligations on them to ensure that Personal Information that it remains responsible for, is kept secure.

## **21. RETURNING, DESTROYING AND/OR DELETING PERSONAL INFORMATION**

- 21.1. Where Gratton College is no longer authorised to retain a record of any Personal Information, it shall either:
- 21.1.1. ensure that the information is permanently destroyed or deleted as soon as reasonably practicable; or





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21.1.2. return the information to the Data Subject or transfer it to a third party, if requested by the Data Subject in writing to do so.

## **22. USER FORUMS ON THE GRATTON COLLEGE PLATFORMS**

- 22.1. If the Data Subject posts content to or comment on another User's posts on a User forum on Gratton College Site, the Data Subject's views will be available to all persons who can access the forum.
- 22.2. If the Data Subject publishes any of the Data Subject's Personal Information onto a forum, Gratton College will not be responsible for how other people make use of or Process that information. Gratton College reserves the right not to publish or to remove any posts it considers inappropriate.

## **23. CHANGE OF CONTROL**

- 23.1. If Gratton College merges with, or is acquired by, any other business, the Data Subject will be notified and any Personal Information that Gratton College holds about the Data Subject will become available to that other business, only in terms of the detailed terms of use of this Policy.

## **24. CONSENT**

- 24.1. The Data Subject hereby consents to the Processing of the Data Subject's Personal Information in terms of the provisions of this Policy.
- 24.2. The Data Subject acknowledges and agrees that such consent has been given voluntarily after the Data Subject has read and understood the provisions of this Policy, in particular, regarding the following:
- 24.2.1. the types of Personal Information to be Processed;
  - 24.2.2. the specific Processing activities to be undertaken;
  - 24.2.3. the specific purpose/s for such Processing; and
  - 24.2.4. the possible consequences for the Data Subject that may arise from such Processing.
- 24.3. Should the Data Subject wish to withdraw any consent previously given by the Data Subject, the Data Subject must notify Gratton College information officer in writing. The Data Subject has the right to withdraw any consent at any time, demand that the Processing of their Personal Information be terminated, and the gathered Personal Information be deleted or closed and that the Gratton College User account be closed, provided that the Data Subject does not have any ongoing activity whether as a Borrower and/or Investor on the Site.



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## 25. LODGING AN OBJECTION

- 25.1. The Data Subject may, on reasonable grounds, object to the Processing of the Data Subject's Personal Information at any time after that Processing has commenced.
- 25.2. If the Data Subject wishes to object to the Processing of their Personal Information, the Data Subject must send written notice of their objection to Gratton College information officer, together with reasons of such objection.

## 26. AMENDMENT OF THIS POLICY

- 26.1. Gratton College reserves the right to change, update, add, remove and/or amend any of the provisions of this Policy from time to time. Such changes, updates, additions, removals, or amendments will become effective from the date of their publication on its Platforms.
- 26.2. It is the Data Subject's obligation to periodically check the provisions of this Policy for any such changes, updates, additions, removals, or amendments.
- 26.3. The Data Subject's continued use of Gratton College Platforms following any changes, updates, additions, removals, or amendments to this Policy will be considered notice of the Data Subject's acceptance to abide by and be bound by this Policy, as amended.

## 27. CONTACT

- 27.1. For more information on the Data Subject's rights to privacy over their Personal Information, or the information Processing activities of Gratton College, please do not hesitate to contact us directly on: [bursar@gratton.co.za](mailto:bursar@gratton.co.za).

## 28. DOCUMENT CONTROL

Amendments to this Policy will take place on an ad hoc basis. Data Subjects are advised to check the policy periodically to inform themselves of any changes.

REVISION NUMBER	PAGE NUMBER/S	CHANGE EFFECTED	DATE OF ISSUE
01	1 to 16	15 October 2023	15 October 2023