

CA CAMPUS PRIVACY POLICY

CA Campus (Pty) Ltd (“CA Campus”) is committed to conducting business in line with applicable laws and the highest ethical standard. This Privacy Policy (“Policy”) was developed and implemented by CA Campus to ensure a lawful, transparent and consistent approach to the processing of your personal information.

CA Campus reserves the right to amend the terms and conditions of this Policy at any time without notice. It is your duty to remain apprised of the current version of these terms and conditions.

The definitions set out in the Protection of Personal Information Act 4 of 2013 (“POPI”) shall apply to this Policy.

1. INTRODUCTION

- 1.1. Inherent in the provision of online educational support services, CA Campus continually has access to and needs to process Personal Information relating to individuals, which processing may take place in South Africa and, where necessary, abroad.
- 1.2. This Policy seeks to ensure that CA Campus complies with the legal parameters set out in POPI together with international legal standards and best practices for processing Personal Information. In doing so, CA Campus:
 - 1.2.1. protects the privacy rights of all Data Subjects with whom it engages;
 - 1.2.2. is transparent in relation to the processing of Personal Information; and
 - 1.2.3. Mitigates the risks of data breaches, unlawful access to personal data or any other form of security compromise.

2. APPLICATION

- 2.1. This Policy applies to the website www.cacampus.co.za (“the Website”) users and CA Campus’s students, lecturers, employees, customers, directors, shareholders and employees or any other person who engages with CA Campus (“You”).
- 2.2. It shall apply from the moment that Personal Information is collected by CA Campus until the moment that the Personal Information is deleted or destroyed.
- 2.3. Compliance with this Policy by all persons as described in clause 2.1 above is mandatory.

3. DATA PROTECTION PRINCIPLES

3.1. POPI sets out core principles that must be observed and complied with at all times from the moment that Personal Information is collected by CA Campus, until the moment that the personal information is archived, deleted or destroyed.

3.2. CA Campus promotes and complies with the following 8 principles:

A. Principle 1: Accountability

CA Campus has appointed an Information Officer who is responsible for ensuring that the information protection principles within POPI and the controls that are in place to enforce them are complied with.

B. Principle 2: Processing Limitation

CA Campus implements a strict context for processing Personal Information. It is minimal and proportionate to its purpose for which the Personal Information was collected. CA Campus adheres to a strict protocol of processing Personal Information to ensure that the processing is lawful at all times.

C. Principle 3: Purpose Specification

CA Campus only collects Personal Information for a lawful and necessary purposes such as: (i) conduction lectures and tutorials and marking tests, (ii) maintaining its internal administrative processes, including quality, risk and management processes, verify or monitor your identity, and (iii) for internal and external business-related purposes and statistical or research purposes.

D. Principle 4: Further processing limitation

CA Campus does not further process Personal Information unless such processing is compatible with the purpose for which the information was collected in principle 3 or the Data Subject has consented further processing.

E. Principle 5: Information Quality

CA Campus takes reasonable practical steps to ensure that the Personal Information that has been collected is complete, accurate, not misleading and up to date, where necessary. It is however your responsibility to ensure that the Personal Information that you provided CA Campus with is accurate, complete and up-to-date. Should Personal Information change it is your responsibility to notify CA Campus of the change and provide CA Campus with accurate data.

F. Principle 6: Openness

CA Campus is transparent about how it processes Personal Information and has put in place practicable steps to promote your rights in this regard as further described in clause 12 hereunder.

G. Principle 7: Security Safeguards

CA Campus ensures that the integrity of the Personal Information in its control is secured through technical and organisational measures.

H. Principle 8: Data Subject Participation

You have the right to request whether your Personal Information is held, as well as the correction and/or deletion of any Personal Information held about you at CA Campus. You may contact the Information Officer for such request.

4. CA CAMPUS AS A RESPONSIBLE PARTY

4.1. CA Campus secures the integrity and confidentiality of Personal Information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent—

- 4.1.1. loss of, damage to or unauthorised destruction of personal information; and
- 4.1.2. unlawful access to or processing of personal information.

4.2. In order to give effect to clause 4.1, CA Campus takes reasonable measures to—

- 4.2.1. identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control;
- 4.2.2. establish and maintain appropriate safeguards against the risks identified;
- 4.2.3. regularly verify that the safeguards are effectively implemented; and
- 4.2.4. ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

5. CATEGORIES OF PERSONAL INFORMATION PROCESSED BY CA CAMPUS

5.1. CA Campus may process the following categories of Personal Information about You:

- 5.1.1. personal details: names, video footage and photographs;
- 5.1.2. demographic information: gender, date of birth, nationality, title;
- 5.1.3. identifier information: passport or national identity number, company registration number; VAT number, student number;
- 5.1.4. contact details: physical address; telephone number; email address;
- 5.1.5. attendance records: details of lectures and tutorials;
- 5.1.6. consent records: records of any consents you may have given, together with the date and time, means of consent and any related information;
- 5.1.7. payment details: billing address; payment method; bank account number or credit card number; invoice records; payment records.

6. PURPOSES FOR WHICH CA PROCESSES PERSONAL INFORMATION

6.1. CA Campus processes Personal Information in the ordinary course of the business of online educational support to students studying accounting and will only process Personal Information lawfully in terms of this Policy. CA Campus uses Personal Information collected from its Data Subjects to do the following which is not an exhaustive list: CA Campus may process your Personal Information for the following purposes:

- 6.1.1. register a new student;
- 6.1.2. create a student profile on the student platform;
- 6.1.3. purchase textbooks;
- 6.1.4. send out course information;
- 6.1.5. invoice;
- 6.1.6. answer queries;
- 6.1.7. notify of changes or updates etc.;
- 6.1.8. administer and protect CA Campus's business;
- 6.1.9. communication, development and improvement of courses and programmes;
- 6.1.10. recruitment and/or human resources.

6.2. In addition to the above, CA Campus may process Personal Information for:

- 6.2.1. relationship management purposes in relation to its services, for accounts management, and for marketing activities in order to establish, maintain and/or improve our relationship with you; and
- 6.2.2. internal management and management reporting purposes;
- 6.2.3. compliance with applicable laws, court order and fraud prevention; and
- 6.2.4. safety and security purposes and/or to protect your interest.

7. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

7.1. CA Campus does share information with third parties where necessary to perform certain functions to provide services and during normal business operation. CA Campus does outsource business functions to third parties. CA Campus will only disclose Personal Information for legitimate business purposes in accordance with applicable laws and confidentiality purposes.

7.2. In addition, CA Campus may disclose Personal Information to third parties in the following circumstances:

- 7.2.1. for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- 7.2.2. where it is necessary for the purposes of, or in connection with, actual or threatened legal proceedings or establishment, exercise or defence of legal rights;

- 7.2.3. to any relevant party for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including, but not limited to, safeguarding against, and the prevention of threats to, public security.
- 7.3. Where CA Campus uses third party suppliers, known as an operator, to the extent required by law, Operators are bound by contractual obligations to:
 - 7.3.1. only process such personal information strictly in accordance with CA Campus's prior written instructions;
 - 7.3.2. use appropriate measures to protect the confidentiality and security of such personal information;
 - 7.3.3. establish and maintain the security measures as set out in clause 4.2 above;
 - 7.3.4. where an operator is located in a foreign country, it is subject to binding corporate rules and agreements which provide an adequate level of protection which may be less stringent than POPI.

8. TRANSFER ACROSS BORDERS

- 8.1. CA Campus may transmit or transfer Personal Information outside the Republic of South Africa ("RSA") to a foreign country and process it in that country. Personal Information may be stored on servers outside RSA in a country which may not have the same level of data protection. Whilst CA Campus will request the other party to adhere to CA Campus's privacy principles, your consent to CA Campus processing your Personal Information in a foreign country whose data protection laws may be less.

9. DATA RETENTION

- 9.1. CA Campus keeps records of personal information for no longer than 5 years after the purpose for which the Personal Information was collected is complete unless required otherwise by law or necessary for any legal, regulatory, tax, accounting or reporting requirement. The Personal Information is thereafter destroyed, deleted or de-identified as soon as reasonably practical.

10. SECURITY SAFEGUARDS

- 10.1. CA Campus has implemented physical, electronic, and managerial security safeguards to protect Personal Information that it processes, including but not limited to:
 - 10.1.1. Personal Information is stored in limited access servers;
 - 10.1.2. Where appropriate, CA Campus uses industry standard encryption;
 - 10.1.3. Physical and network security measures;
 - 10.1.4. Network security measures;
 - 10.1.5. Disaster recovery procedures;

- 10.1.6. Encryption methods;
- 10.1.7. Audits for identifying vulnerabilities and attacks; and
- 10.1.8. Regular staff training.

- 10.2. Whilst CA Campus takes all reasonable measures to keep Personal Information secure, CA Campus takes not responsibility or liability of any nature whatsoever for the interception or loss of Personal Information beyond CA Campus's control.

11. INFORMATION OFFICER

- 11.1. CA Campus has appointed Candice de Nobrega as the Information Officer.
- 11.2. The Information Officer shall:
 - 11.2.1. ensure that all operational and technological data protection standards are complied with;
 - 11.2.2. advise of any risk of breach at the earliest opportunity with a view to avoiding any further risk or breach, or limiting any damage resulting from it;
 - 11.3. arrange data protection training and provide advice and guidance to all employees;
 - 11.4. initiate disciplinary proceedings against any employee who at any time breaches any technological and/or organisational and/or operational data protection standard, rule, custom, instruction, policy, practice and/or protocol applicable in any department or area of the operations of CA Campus;
 - 11.5. review and approve any contracts or agreements with third parties to the extent that they may handle or process data subject information;
 - 11.6. attend to requests from individuals to access personal information CA Campus holds about them.

12. YOUR CONSENT AND UNDERTAKING

- 12.1. By engaging with CA Campus in anyway and by furnishing CA Campus with Personal Information, you consent to CA Campus processing your Personal Information in accordance with the terms of this Policy.
- 12.2. You further consent that CA Campus may transfer your Personal Information cross border for legitimate business purposes and/or to protect your best interest.
- 12.3. Explicit or implied consent is not required where the processing of Personal Information:
 - 12.3.1. is necessary to carry out actions for the conclusion or performance of a contract to which the data subject of the personal information is a party;
 - 12.3.2. is required in order to comply with an obligation imposed by law;

- 12.3.3. is for a legitimate purpose or is necessary to protect the legitimate interest and/or for pursuing the legitimate interests of i) data subject; ii) the person processing the personal information; or iii) that of a third party to whom the personal information is supplied; or
- 12.3.4. is necessary for the proper performance of a public law duty by a public body or on behalf of a public body.

12.4. The Personal Information provided to CA Campus must be accurate, complete and up-to-date. You undertake to notify CA Campus of any change of information to ensure completeness and accuracy of the Personal Information processed by CA Campus.

13. YOUR RIGHTS

13.1. You have the right to:

13.1.1. withdraw consent: You understand that CA Campus may still be authorised to process the Personal Information in accordance with clause 12.3 above. You further understand and accept that by withdrawing consent CA Campus may longer be able to deliver services, CA Campus shall not be liable for any loss or damages attributable to such withdrawal.

13.1.2. be informed: You may request a copy of the Personal Information that CA Campus holds about you. Please send this request to info@cacampus.co.za;

13.2. to log a complaint: Should you believe that CA Campus has acted contrarily to this Policy or any applicable privacy, you undertake to first attempt to resolve any concerns with CA Campus. A POPI Complaint Form is available on the Website. Should the complaint not be resolved to your satisfaction you may refer to the Information Regulator at complaints.IR@justice.gov.za .

14. DATE OF PUBLISHING

Last Updated 05 August 2021

If you have any queries about this Privacy Policy please contact our Information Officer at candice@cacampus.co.za .