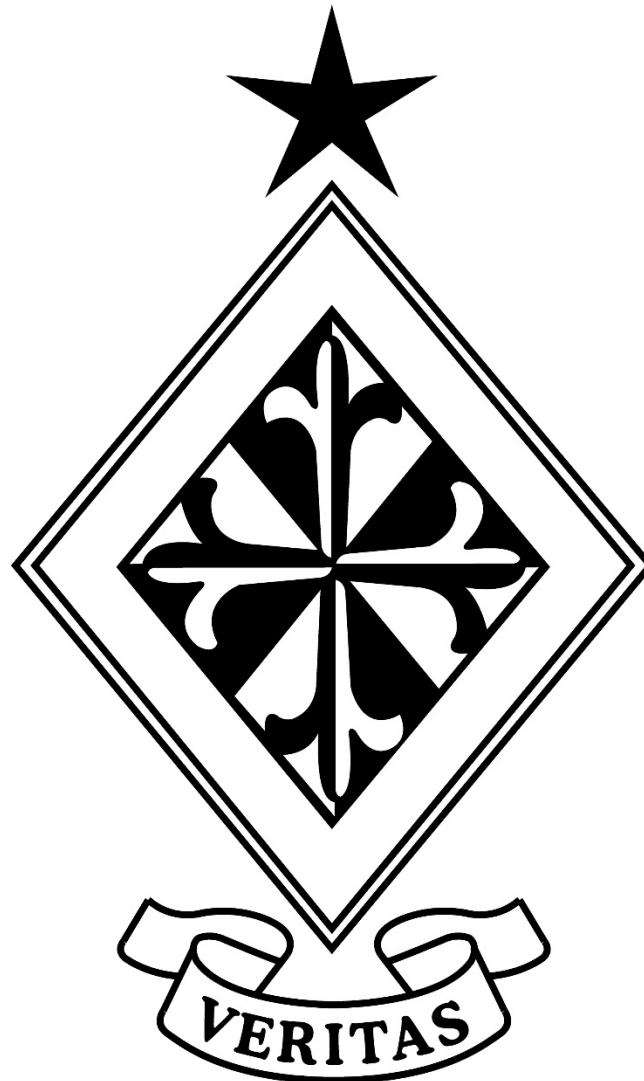


# St Catherine's School



*Learning today,  
Leading tomorrow*

**WEBSITE PRIVACY POLICY**

August 2021

- 1.1. Welcome to our website, owned, and operated by St Catherine's School. The School is committed to protecting the privacy of the user of the website. The School values the trust of all Users and recognises that maintaining trust requires transparency and accountability in managing personal information. This privacy policy is incorporated into and subject to the School's standard terms and conditions and the general terms relating to the use of the website.
- 1.2. In performing the School's services in the ordinary course of business, the School may collect, use and disclose personal information. Anyone from whom the School collects such information can expect that it will be appropriately and lawfully protected and that any use of or other dealing with this information is subject to consent, where this is required by law. This is in line with the general privacy practices of the School.
- 1.3. In this policy, in addition to the other terms that have been defined in the body of the policy, the School makes use of the following terms:
  - 1.3.1. "**Personal Information**" means all information which may be considered to be personal in nature or information about an identifiable natural and/or existing juristic person in terms of the Electronic Communications and Transactions Act 25 of 2002 ("**ECTA**"), the Consumer Protection Act 68 of 2008 ("**CPA**") and the Protection of Personal Information Act 4 of 2013 ("**POPIA**"); and
  - 1.3.2. "**User**" refers to any person who makes use of the website for any purposes whatsoever, whether or not such use is free of charge or paid for.
- 1.4. In addition, unless the contrary is specified, terms that are used in the policy that are specifically defined in POPIA, are given the meanings ascribed to them in POPIA.

The School may collect personal information in conducting its ordinary business operations, including through the use of its website. In processing such personal information, the School at all times ensures that

- (i) it complies with the provisions of POPIA, and
- (ii) such personal information is used for legitimate business purposes.

- 1.5. The School does not, except where otherwise permitted by law, collect, use or disclose your personal information without your consent.
- 1.6. The School operates its website, and conducts its business in general, in accordance with South African legislation.
- 1.7. In the event that the School sends personal information outside of South Africa (including if such information is hosted offshore), the School will ensure that it takes all reasonable steps to ensure that it complies with all applicable laws in this regard, including POPIA.

All personal information retained on the School's database, including such information obtained through the use of the website, is in accordance with the retention provisions set out in the applicable laws and regulations of South Africa, including those set out in POPIA
- 1.8. Users have the right to contact the School at any time to ask the School to:
  - 1.8.1. confirm that it holds personal information (at no charge);
  - 1.8.2. provide access to any records containing personal information or a description of the personal information that the School holds (subject to payment of a prescribed fee); and/or
  - 1.8.3. confirm the identity or categories of third parties who have had, or currently have, access to personal information (also subject to payment of a prescribed fee).
- 1.9. The School's contact information is available on the website.
- 1.10. When Users make a request regarding personal information, the School will take reasonable steps to confirm identity.
- 1.11. There may be times when the School cannot grant access to personal information, including where granting access would
  - (i) interfere with the privacy of others, or
  - (ii) result in a breach of confidentiality. The School will always provide you with reasons if this is the case.
- 1.12. If Users are of the view that any personal information that the School holds is incorrect in any way, including that it is inaccurate, irrelevant, outdated, incomplete or misleading, Users are allowed to ask the School to correct it. If Users believe that any personal information that the School holds is excessive or has been unlawfully obtained, Users can ask the School to destroy or delete it. Users may do the same if they think that the School has retained it for longer than necessary, given the purpose. The School will do so unless there are good grounds not to (such as that the School is required to hold it for a period prescribed by any applicable legislation).
- 1.13. It is important to understand that if Users withdraw our consent for the School to use personal information, it may affect the quality and level of service that the School can provide.

- 1.14. The School confirms that it takes all reasonable measures to:
  - 1.14.1. identify all reasonably foreseeable internal and external risks to any personal information in its possession or under its control;
  - 1.14.2. establish and maintain appropriate safeguards against any risks that are identified by the School;
  - 1.14.3. regularly verify that these safeguards are effectively implemented by or on behalf of the School; and
  - 1.14.4. ensure that such safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.
- 1.15. The website uses cookies in a limited way.
- 1.16. The website may contain links to third party websites. In the event that Users follow a link to any of these websites, it is important to note that these websites have their own terms of use and privacy policies and that the School does not accept any responsibility or liability for them.
- 1.17. The School, in its sole discretion, reserves the right to update, modify or amend this Policy from time to time with or without notice. You therefore agree and undertake to review the Policy whenever you visit the website. Save as expressly provided to the contrary in this Policy, any amended version of the Policy shall supersede and replace all previous versions thereof.