



## PRIVACY & DATA PROTECTION POLICY

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	<b>Name</b>	<b>Date</b>	<b>Signature</b>
Complied by	Mr. Kopano Molefe	15 September 2023	<i>K. Molefe</i>
Reviewed by	Mr. Katlego Thindisa	15 September 2023	<i>KJ Thindisa</i>
Approved by	Executive Committee	15 September 2023	

### Amendments, Review and Changes

<b>Date</b>	<b>Revision</b>	<b>Section</b>

# **WE RESPECT PRIVACY RIGHTS**

Edukat respects the legal requirements that exist regarding the privacy of personal information and is committed to complying with all applicable laws, and knows the right to privacy is an integral human right, recognised and protected in the South African Constitution as endorsed by the Protection of Personal Information Act 4 of 2013 and the Promotion of Access to Information Act 2 of 2000.

At Edukat we highly regard and uphold your right to privacy, and take the protection of personal information very seriously. We are committed to safeguarding and effectively managing personal information in accordance with the applicable laws, and we appreciate your trust in us to do that carefully and sensibly.

# Our Privacy & Data Protection Policy

*Please read the following Privacy & Data Protection Policy to understand what personal information you provide us with, how this information is processed and the purposes for which such processing is undertaken by the company.*

## **INTRODUCTION AND SCOPE**

Edukat Proprietary Limited shall mean ("Edukat" or "Company" or "We" or "Our" or "Us") and/or any of its subsidiaries and/or any other legal entity, joint venture and/or partnership(s), wherever situated or operating (irrespective of structure and/or legal nature), associated with Edukat, which renders services or conducts business activities under Edukat and/or any variation thereof (including subsidiaries, parties that are related or inter-related to Us and/or affiliated companies, to the extent applicable), and all such entities' successors-in-title, including in countries which may not have data-protection laws similar to those of the country in which your personal information was collected) for as long as they remain associated with the Company.

This policy applies to proprietary information and personal information relating to the business activities and affairs of the Company, any of its affiliates or related companies, employees, clients, contractors, representatives, or business associates; including via the Company web site, online/onsite or offline/offsite business activities and affairs (together with any and all future online/onsite and offline/offsite business activities and affairs, operated by or on behalf of the Company).

This policy sets out how your personal information will be collected and processed by the Company, and applies to any information, including personal and special personal information, given or gathered by the Company, or which the Company may collect from third parties. It is important that you read this policy carefully before submitting any personal information to the Company and by submitting any personal information to the Company, you provide consent to the processing of your personal information.

Do not submit any personal information to the Company if you do not agree to any of the provisions of this policy, if you do not consent to the provisions of this policy, or parts of the policy.

You must accept all the terms of this policy when you procure our products or request/use our services, and if you do not agree with anything in this policy or if you do not accept this policy, then you may not procure our products/goods or request/use our services, instruments, or technology, and the Company may not be able to (I) provide its services and products to you, and/or (II) provide third party services and products to you (i.e. consulting, advisory and solutioning services), if you do not consent to the provisions or parts of this policy.

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms, including our web site [terms and conditions](#), and you undertake to comply with the stated processes and procedures.

Should any of the Personal Information concern or pertain to a legal entity whom you represent, you confirm that you have the necessary authority to act on behalf of such legal entity and that you have the right to provide the Personal Information and/or the required permissions in respect of the processing of that Organization or entities' Personal Information.

All persons and entities whose responsibilities include the processing of personal information on behalf of the Company are expected to comply and adhere to the provisions set out in the Company's Privacy & Cookie Policy.

Our privacy policy adheres to the General Data Protection Regulation (GDPR), agreed upon by the European Parliament and Council in April 2016 and the Protection of Personal Information Act, 4 of 2013 (POPIA) and takes into consideration any other local laws and guidelines including the Promotion of Access to Information Act, 2 of 2000 (PAIA).

### **PERSONAL INFORMATION**

In this policy and any other Company documentation/information, "Personal Information" shall refer to personal information about a person(s) and/or entities as defined in the POPIA (as amended from time-to-time).

Furthermore, Personal Information includes certain information that we gather, collect and/or is provided by third parties but excludes:

1. information that has been made anonymous so that it does not identify a specific person;
2. permanently de-identified information that does not relate or cannot be traced back to you specifically;
3. non-personal statistical information collected and compiled by us; and
4. information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

This policy does not apply to the information practices of third party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that Edukat does not manage or employ. These third party sites may have their own privacy policies, terms and conditions, we encourage you to read them before using or accessing them.

### **YOUR PRIVACY RIGHTS**

The Company aim to ensure that it gives effect to the following rights listed below and to exercise any of the below rights, please submit all requests or forms using the contact details provided in this policy. You have the right to have your Personal Information processed lawfully and these rights include:

1. to be notified that your information is being collected or that your information has been accessed or acquired by an un/authorised person(s);
2. to find out whether we hold your Personal Information and to request access to your Personal Information;

3. to request, where necessary, to correct, destroy or delete your Personal Information;
4. to object, on reasonable grounds, to the processing of your Personal Information;
5. to object to the processing of your Personal Information for purposes of direct marketing, including by way of unsolicited communications;
6. not to be subject, in certain circumstances, to a decision which is based solely on the automated processing of your Personal Information;
7. to submit a complaint to the Information Regulator if you believe that there has been interference with the protection of your Personal Information or if you believe that an independent adjudicator who may be resolving your complaint against us, has not decided the matter correctly; and
8. to withdraw consent at any time if the Company is relying on consent to process Personal Information if you believe that we have interfered with the protection of your Personal Information.

For more information on how to exercise your rights around your Personal Information, please refer to our PAIA manual.

#### **TYPES OF PERSONAL INFORMATION WHICH WE MAY COLLECT AND PROCESS**

The types of Personal Information we may collect (directly from you, private/public entities or from third party sources) and our privacy practices, processes, and procedures depend on the nature of the relationship with the Company and the requirements of the applicable law.

The type of Personal Information to be collected by the Company shall include, but not limited to the following:

1. Identifying Information;
2. Contact Information;
3. Demographic Information;
4. Location Information;
5. User, Device and Browser Information;
6. Financial Information;
7. B BBEE Information;
8. Education Information;
9. Founding Documents Information;
10. Events, Marketing and Business Development Activities;
11. Business Communications, Online/Onsite and Offline/Offsite Business Interactions Information;
12. Criminal Information;
13. Employment Information;
14. Third Party Service Providers, including Analytics, Advertising, Search Information, Technical, Payment and other services providers;
15. Medical Information;
16. Sexual Information;
17. Tenders, Quotations, Proposals, and the like made by or to us, Information;
18. Surveillance Information e.g. CCTV cameras at the our offices;
19. Subscription to our services, publications or marketing material(s) Information;
20. Special/Sensitive Personal Information;

21. Services and Products Information; any other Personal Information for purposes required to operate and manage the Company's business operations.
22. Special Personal Information is sensitive Personal Information of a data subject and the Company acknowledges that it will generally not process special Personal Information unless:
  - a. processing is carried out in accordance with the data subject's consent;
  - b. processing is necessary for the establishment, exercise or defence of a right or obligation in law;
  - c. processing is for historical, statistical or research purposes, subject to stipulated safeguards;
  - d. information has deliberately been made public by the data subject; or
  - e. specific authorisation applies in terms of POPIA.

### **COLLECTION OF INFORMATION**

The Company collects Personal Information in various instances, including, but not limited to the following:

1. You communicate with Us, we may collect Personal Information from you such as your email address, phone number or postal mailing address, when you choose to request information or contact us about our services/products.
2. We communicate with you for matters relating to procurement for services/products or other related matter(s).
3. A data subject engages with Us through our various media platforms (web site, telephone, social media and applications), as you navigate these media platforms, certain passive information may also be collected about your visit, including through cookies and similar technologies.
4. Surveillance, we use various surveillance mediums including CCTV in our facilities for health, safety and security reasons, or for purposes of enabling the enforcement of our rules. If you have any queries in relation to the use of CCTV operating in and around our facilities please contact us.
5. You participate in surveys and reviews, from time to time, we (or third parties acting on our behalf) may contact you to participate in research, surveys or beta testing or to provide reviews and testimonials. If you decide to participate, you may be asked to provide certain information, which may include Personal Information. All information collected from your participation in our research, surveys, reviews or testimonial process, or beta testing is provided by you voluntarily. We may use such information to improve our products and/or services, and in any manner consistent with this policy.
6. Posting on the Company or third party platforms, the Company may offer publicly accessible blogs, social media pages, service/product review pages, private messages, and video chat or community forums. You should be aware that, when you disclose information about yourself on the Company's blogs, social media, service/product review

pages, private messages, community forums, and within video chat sessions, the Company will collect the information you provide in such submissions, including any Personal Information. If you choose to submit content, including reviews, to any public area or on any public sites operated by third parties, such content will be considered public and will not be subject to the privacy protections provided in this policy.

7. Based on your interaction with the Company, we may collect location-based information including your Internet protocol address (IP), GPS location, longitude/latitude, city, province, postal code and region, and your location and your proximity to beacons, and/or other proximity systems. We may use this type of information to enhance your user experience (such as using location information for the purposes of displaying the geographic distribution of the Company's products and services), to better understand your interaction with our products and services. Unless you provide Us with your consent to do otherwise, this information will only be used by Us and our third party service providers to provide you with the products/services you request or in an aggregated and anonymized format that does not identify you. If you no longer wish to have this location information collected and used by Us, you may opt-out by disabling the location and other proximity features in the operating system of your device.
8. Information from other sources, we may receive information about you from other sources, including through third party service providers, entities and organizations. For example, if you access or interact with the Company through third party platforms, we may collect Personal Information about you from that third party platform that you have made public via your privacy settings. Personal Information we collect may include your name, your social media site user identification number, your user name, location, gender, birth date, email, profile picture and your social media contacts. In some instances, it is necessary for you to provide us with the information, so that a party may render services to the other party. As with all companies, we may need to collect your information in terms of other various laws, rules, regulations and additional legislation(s).
9. Special Personal Information, the term "Special Personal Information" in this context refers to information relating to your religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life or criminal behaviour. Whilst we do not generally collect special Personal Information, we may under certain circumstances (such as for demographic analysis), collect special Personal Information and by providing this information to Us, you are consenting to Us using it in the manner set out in this policy.
10. Personal Information about children, we do not knowingly collect Personal Information from children without the permission of their parent or guardian. The Company acknowledges that it may not process any Personal Information concerning a child and will only do so where it has obtained the consent of the parent or guardian of that child or where it is permitted to do so in accordance with applicable laws. As a parent or guardian, please do not allow your children to submit Personal Information without your permission.

#### **PROCESSING OF PERSONAL INFORMATION**

The Company will generally use Personal Information for purposes required to operate and manage its normal business operations and these purposes include one or more of the following non-exhaustive purposes:

1. provide services/products to our clients and various stakeholder;
2. to meet your legitimate interests;
3. for our legitimate interests;
4. to meet our legal, business and marketing purposes and obligations;
5. to keep any work product or other as part of the Company's internal know-how;
6. comply with requirements under applicable laws;
7. to deliver relevant content and newsletters, and other information to you (which may include direct marketing material);
8. to use data analytics to improve products/services and client relationships/experiences;
9. to monitor, keep record of and have access to all forms of correspondence or communications received by or sent from the Company, including monitoring, recording and using as evidence, where applicable, in the interest of security and delinquency prevention;
10. in connection with disclosing to third parties for reasons set out in this policy;
11. for purposes of preventing, discovering and investigating non-compliance with this policy and other Company policies, and investigating delinquencies, or other related matters;
12. for such other purposes in accordance with the consent given by you from time to time; and
13. for such other purposes as authorised in terms of applicable law.

### **Further Processing**

Personal Information will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

Further processing will be regarded as compatible with the purpose of collection if:

- Data Subject has consented to the further processing;
- Personal Information is contained in a public record;
- Personal Information has been deliberately made public by the Data Subject;
- Further processing is necessary to maintain, comply with or exercise any law or legal right; and
- Further processing is necessary to prevent or mitigate a threat to public health or safety, or the life or health of the Data Subject or a third party.

### **Opt-Out (Right to Object to Processing)**

You have the right to object to and opt-out of certain uses and disclosures of your Personal Information. Where you have consented to the Company's processing of your Personal Information or Special Personal Information, you may withdraw that consent at any time and opt-out to further processing by submitting the Opt-Out Request Form.

In such circumstances, the Company will give due consideration to the request and the requirements of POPIA. The Company may cease to use or disclose the Personal Information and may, subject to any statutory and contractual requirements/obligations, also approve the destruction of the personal information.

## **DISCLOSURE OF PERSONAL INFORMATION**

**Personal Information under our custodian is an important part of our business and we do not sell it to others.**

We may share your Personal Information as described in this privacy policy (e.g. with our third party service providers, to comply with legal obligations, to enhance the services/products, to protect, enforce and defend our rights).

The Company may disclose Personal Information for the purposes described below:

- **Third Party Service Providers (sometimes in other jurisdictions):** We may engage with other natural and/or juristic persons and entities to perform functions on their or our behalf, these third party service providers have access to Personal Information needed to perform such functions, but may not use it for other purposes. Further, they must process the Personal Information in accordance with this policy and as permitted by the applicable laws.
- **Company business activities and affairs:** The Company may externally and/or internally share and disclose Personal Information in connection with business operations and/or transactions, and generally Personal Information is one of the shared, disclosed and transferred business assets, but this Personal Information remains subject to the promises made under this privacy policy and it is used to guide decisions about our products, services, and communications.
- **Marketing – Interest-Based Advertising and Third-Party Marketing:** The Company may disclose and allow access to Personal Information to third party business or advertising partners, and we may also share selected Personal Information with third party business or advertising partners to facilitate transmittal of information that may be useful, relevant, valuable or otherwise of interest to you.
- **Business or Ownership Transfer:** If the Company chooses to sell, acquire, transfer, merge, undergo change in ownership, we may assign our rights to the Personal Information we collect or process to a successor, purchaser or separate entity. If you are concerned about your Personal Information migrating to a new owner, you may request us to delete your Personal Information.

- Government, Regulators or other authorities: We share information with local or foreign authorities if we are required or permitted to do so in terms of the applicable laws.
- Information is shared on a confidential basis, and unless you have consented otherwise, under no circumstances is the business partner or third party entitled to make any communication to you, or make any further transmission of the information, as a result of the Personal Information we share with them. Each transmission of the Personal Information with the business partner or third party differs, but it is specific to the particular information share exercise being undertaken.
- Employees and other persons acting on behalf of the Company are required to treat Personal Information as a confidential business asset and to respect the privacy of data subjects. Employees and other persons acting on our behalf may not directly or indirectly, utilise, disclose or make public in any manner to any person or third party, any Personal Information, unless such Personal Information is already publicly known or the disclosure is necessary in order for the employee or person to perform their duties.

Employees and other persons acting on our behalf must ensure that they comply with this policy.

#### **TRANSFER OF PERSONAL INFORMATION**

The Company may transmit or transfer Personal Information outside the country in which it was collected and process it in that country, including, potentially, to countries that have different or similar, if not none, data protection laws. As some of our service providers, depending on the services we provide, may collect, store and process your Personal Information in other countries, you hereby consent to us collecting and processing your personal information in a foreign country whose laws regarding Personal Information may be less stringent.

If the Company is required to transfer Personal Information cross-border to a third party, it shall ensure that the third party is subject to a law, binding code of conduct or contract that effectively upholds principles for the reasonable processing of Personal Information, which are substantially similar to the data protection laws offered in the Republic of South Africa.

#### **ACCURATE INFORMATION**

You agree to give us accurate Personal Information and to update it if it changes. You also indemnify us from any losses, damages or harm that may result in us relying on any inaccurate Personal Information provide by you to Us or collected by Us from third parties.

#### **TRANSPARENCY**

The Company will take reasonable steps to ensure that data subjects are notified, made aware that their personal information is being collected including the purpose for which it is being collected and processed.

#### **RETENTION OF PERSONAL INFORMATION**

The Company retains Personal information for as long as may be reasonably necessary in accordance with applicable law, and/or in order to manage our business operations and purposes. It is impractical for us to tell you in this document how long we may keep your information, however, our first obligation is to keep it as long as may be required by law, and we

retain Personal Information for as long as we maintain our legitimate business functions, and then for a reasonable period of time that allows us to assist with any queries, requests, or complaints regarding our business activities, to commence or defend legal claims, resolve disputes and to comply with our regulatory obligations (including record retention obligations).

We will only retain your Personal Information for as long as it is necessary to fulfil the purposes explicitly set out in this policy and during the period of retention, we will continue to abide by our non-disclosure obligations.

We may retain your Personal Information in physical or electronic records at our discretion.

## **SECURITY**

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. We maintain commercially reasonable administrative, technical and physical safeguards (which vary depending on the sensitivity of the Personal Information) designed to protect and minimise against loss, unauthorized use, disclosure, interference, modification, destruction or access of Personal Information. The Company will continuously review its security controls and aims to ensure physical and electronic records comprising Personal Information are securely stored and made accessible only to authorised personnel.

Company operators and third-party service providers will be required to pledge their mutual commitment to the security principles set out in this policy and the lawful processing of any Personal Information pursuant to the certain agreement(s) and agree to keep all Personal Information which the Company provides them access to with the utmost confidentiality and applying appropriate security safeguards to protect such Personal Information.

Unfortunately, no storage facility system can be guaranteed to be 100% (one hundred percent) secure, and we cannot ensure or warrant the security of any Personal Information you provide to us and we do not accept liability for unintentional disclosure and by providing Personal Information to Us, you agree that we may communicate with you electronically regarding security, privacy and administrative issues relating to your Personal Information.

If we learn of a security breach, we may attempt to notify you electronically by posting a notice or sending an email to you. You may have a legal right to receive this notice in writing.

## **PERSONAL INFORMATION DATA BREACH**

Any incident in terms of which reasonable grounds exist to believe that the Personal Information of a data subject has been accessed, compromised or acquired by any unauthorised person, we will address any and such incidents in accordance with the terms set out in this policy, and notify the Information Regulator and the affected data subject (unless the applicable law requires that we delay notification to the data subject), in writing in the event of a data breach (or a reasonable belief of a data breach) in respect of that data subject's Personal information.

## **ACCESS TO PERSONAL INFORMATION**

All persons and entities may request access, amendment, or deletion of their own Personal Information held by the Company. Any requests should be directed, on the prescribed form, to the Information Officer under the following:

1. Request access to personal information, including the right to receive a copy of the Personal Information.
2. Request amendment/correction of any incomplete or inaccurate Personal Information.
3. Request deletion of Personal Information if the Company is not authorised to process the personal information.
4. Object to processing of Personal Information and if the Company is relying on its legitimate interest (or those of a third party) to process the Personal Information, but as a result of such processing infringes or impacts your fundamental rights and freedoms.
5. Request restriction of processing of Personal Information under an ongoing investigation.

#### **REMEDIES AVAILABLE IF REQUEST FOR ACCESS TO PERSONAL INFORMATION IS REFUSED**

1. Internal Remedies
  - a. The Company does not have internal appeal procedures. As such, the decision made by the Information Officer pertaining to a request is final, and requestors will have to exercise such external remedies at their disposal if a request is refused, and the requestor is not satisfied with the response provided by the Information Officer.
2. External Remedies
  - a. A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a competent tribunal, adjudicator, court or the appropriate authority for relief. Likewise, a third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a competent tribunal, adjudicator, court or the appropriate authority for relief.

### 3. Grounds for Refusal

a. The Company may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Company may refuse access include:

- i. Protecting Personal Information that the Company holds about a third person (who is a natural person) including a deceased person, from unreasonable disclosure;
- ii. Protecting commercial information that the Company holds about a third party or Edukat (for example trade secret: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the company/organisation or the third party);
- iii. If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- iv. If disclosure of the record would endanger the life or physical safety of others;
- v. If disclosure of the record would prejudice or impair the security of property or means of transport;
- vi. If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- vii. If disclosure of the record would prejudice or impair the protection of the safety of the public;
- viii. The record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- ix. Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of Edukat;
- x. Disclosure of the record would put Edukat at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- xi. The record is a computer programme; and
- xii. The record contains proprietary information being carried out or about to be carried out on behalf of a third party or Edukat.

### 4. Records that cannot be found or do not exist

If the Company has searched for a record and it is believed that the record does not exist or cannot be found, the requester will be notified either verbally and/or in writing.

You may access your Personal Information which is under our control by following the procedure set out in our PAIA Manual.

### **RETURNING, DESTROYING OR DELETING PERSONAL INFORMATION**

Personal Information documentation (physical or electronic) may be destroyed after the termination of the retention period specified herein, or as determined by the Company, from time to time. Where the Company is no longer authorised to retain a record of any Personal Information, it shall either:

1. Ensure that the Personal information is permanently destroyed or deleted as soon as reasonably practicable; or

2. Return the Personal information to the data subject or transfer it to a third party, if requested by the data subject, in writing, to do so.

### **ELECTRONIC LINKS & COOKIES**

Our web site and other marketing platforms may include links to other web sites, plug-ins and applications, and clicking on those links or enabling those connections may allow third parties to collect or share your Personal Information. We do not control these third party platforms and we are not responsible for their privacy policies and when you leave or redirect from our media sites, we encourage you to read all applicable privacy policies.

Cookies are alphanumeric identifiers that we transfer to your device's hard drive through your web browser to enable our systems to recognise your browser and to automatically collect information from your device such as your IP address and other details about your device which are automatically collected by our web server, operating system and browser type, for system administration and to report aggregate information. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

The **Help** menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as flash cookies, by changing the add-on's settings or visiting the website of its manufacturer. However, because cookies allow you to take advantage of some of the Company's essential features, we recommend that you leave them turned on. If you do leave cookies turned on, be sure to sign off when you finish using a shared device.

Please note that our business partners may also use cookies, over which we have no control:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our Site.

### **DIRECT MARKETING**

The Company may carry out direct marketing and shall strive to observe, and comply with its obligations under this policy when implementing principles and practices in relation to direct marketing. The Company acknowledges that it may only use Personal information to contact the data subject(s) for purposes of direct marketing from time to time where it is permissible to do so. It may use Personal Information to contact any data subject and/or market the Company's services/products directly to the data subject(s) if the data subject is an existing client, the data subject has requested to receive marketing material from Us or We have the data subject's consent to market Our services directly to them.

The Company will not use your Personal Information to send you marketing materials if you have requested not to receive them. If you request that we stop processing your Personal Information for marketing purposes, the Company shall happily oblige. We encourage that such requests to opt-out of marketing be made via forms and links provided for in this policy and/or as per the applicable laws.

## **NOTICES AND REVISIONS**

If you have any concern about our privacy and data protection Policy, please e-mail us a thorough description and we will try to resolve the issue for you. Our business changes constantly and this policy and the website terms and conditions will also change from time to time. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our web site frequently to see any recent changes. Unless stated otherwise, our current privacy policy applies to all Personal Information that we have about you and your interactions with Us.

However, we stand behind the promises we make and will never materially change our policies and practices to make them less protective unless we are legally entitled or obliged to do so.

This Privacy Policy may change from time to time. You understand and agree that you will be deemed to have accepted the updated privacy policy if you use our services/products after the updated privacy policy has been made public (as reflected in the effective date).

We may revise this privacy policy in our sole discretion, so please review it periodically. If you continue to visit our site and use our services /products after such changes have been made, you thereby provide your consent to the changes.

If there are any material changes to this privacy policy, the Company will notify you by email or as otherwise required by applicable law. We will post any adjustments to the privacy policy on our various platforms e.g. website, and the revised version will be effective immediately when it is posted (or upon notice if applicable).

## **ENQUIRIES**

If you have any questions, comments, complaints or concerns arising from this privacy policy or the way in which we handle personal information, please contact the below:

### **The Company**

Information Officer: Mr. Katlego Thindisa

Email: [Legal@edukat.co.za](mailto:Legal@edukat.co.za).

Deputy Information Officer: Mr. Kopano Molefe

Email: [Legal@edukat.co.za](mailto:Legal@edukat.co.za).

Physical Address: Thornhill Office Park, Building 10, 94 Bekker Road, Vorna Valley, Midrand, Gauteng, South Africa, Southern Africa, 1686

### **The Information Regulator**

[www.inforegulator.org.za](http://www.inforegulator.org.za)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

## **RECORDS AND ANNEXURES**

The Personal Information is classified and grouped according to records relating to the following subjects and categories (See PAIA Manual):