



Our Privacy Statement

Definitions

- 1.1. **We, us** and **our** refers to eAdvance(Pty)Ltd t/a SPARK Schools.
- 1.2. **You and your** refers to parents/legal guardians/adoptive parents/scholars/students
- 1.3. **Your personal information** refers to personal information about you, your spouse, your dependents, your employees (where applicable). It includes but not limited to information about financial status, gender, age, contact numbers, addresses and educational history.
- 1.4. **Process information** means the automated or manual activity of collecting, recording, organising, storing, updating, distributing and removing or deleting personal information.
- 1.5. **Competent person** means anyone who is legally competent to consent to any action or decision being taken for any matter concerning a child, for example a parent or legal guardian.

Purpose of this Privacy Statement

2. When you engage with us, you trust us with personal information about yourself, your dependants and in some case, your employees. We are committed to protecting your right to privacy.
The purpose of this Privacy Statement is to set out how we collect, use, share and otherwise process your personal information, in line with the Protection of Personal Information Act ("POPIA").

Acceptance is voluntary

3. It is voluntary to accept these terms and conditions.
However, we require your acceptance to activate and service your SPARK enrolment and admission. This means that if you do not accept, we cannot activate and service your SPARK enrolment and admission.

We keep personal information confidential

4. We will keep your personal information confidential. You may have given us this information yourself or we may have collected it from other sources. If you share your personal information with any third parties, we will not be responsible for any loss suffered by you, your dependants, your spouse or your employees.

Authority to act for other people

5. You understand that when you include your spouse and/or dependents on your application, we will process their personal information for enrolment purposes and to pursue their legitimate interest. We will furthermore process their information for the purposes set out in this Privacy Statement.

6. If you are an employer, you agree to indemnify us against any loss or damage, direct or indirect, that an employee suffers because of the unauthorised use of your employees' personal information.
7. When you provide consent for a person under 18 (a minor) you confirm that you are a competent person and that you have such authority to provide consent for them.

Purpose of processing personal information

8. You agree that we may process your personal information for the following purposes:
 - 8.1. The administration of enrolment and admission;
 - 8.2. The rendering and provision of services by SPARK that you or any of your dependant/s may require; and
 - 8.3. The provision of relevant information to a contracted third party who require such information to render a service to you or any dependant scholar and only if such contracted third party agrees to keep the information confidential.

Sharing personal information with third parties

9. If a third party asks us for any of your personal information, we will share it with them only if:
 - 9.1. you have already given your consent for the disclosure of information to that third party; or
 - 9.2. we have a legal or contractual duty to give the information to that third party; or
 - 9.3. for risk and fraud prevention purposes.

Sharing information within the eAdvance Group

10. You confirm that we may share your personal information within the eAdvance group of companies for:
 - 10.1. Administration, including inter-company/integrated benefit or product administration;
 - 10.2. fraud prevention; and
 - 10.3. where necessary to provide Group-wide services, benefits and support to help you in your personal or professional capacity.
11. You also confirm that we may share and combine all your personal information for any one or more of the following purposes:
 - 11.1. market, statistical and academic research; and
 - 11.2. to customise our services to benefit and meet your needs.

Sharing for research and improvement purposes

12. You agree that your personal information may be shared with third parties such as academics and researchers, including those outside South Africa. We ensure that the academics and researchers will keep your personal information confidential and all data will be made anonymous to the extent possible and where appropriate. No personal information will be made available to a third

party unless that third party has agreed to abide by strict confidentiality protocols that we require. If we publish the results of this research, you will not be identified by name. If we want to share your personal information for any other reason, we will do so only with your permission.

13. By signing this enrolment form, you authorise us to obtain and share information about your creditworthiness with any credit bureau or credit provider's industry association or industry body. This includes information about credit history, financial history, judgments, default history (in accordance with the requirements of the National Credit Act and Regulations) and sharing of information for purposes of risk analysis, tracing and any related purposes.

Right to communicate electronically

14. We may process your information using automated means (without human intervention in the decision making process) to make a decision about you or your application for any product or service. You may query the decision made about you.
15. We have the right to communicate with you electronically about any changes on your enrolment, admission and/or scholarship or bursary, including your fees or changes and improvements to the services you are entitled to.

Duty to keep you informed

16. We have a duty to keep you updated about any offers and new products that we make available from time to time. Any entity within the eAdvance Group and contracted third-party service providers may communicate with you about these.
17. Please let us know if you do not wish to receive any direct telephone marketing from us.

You have the right to know what personal information we have

18. You have the right to know what personal information we hold about you. If you wish to receive a copy, please complete a form called an 'Access Request Form' on www.sparkschools.co.za and specify the information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

We are entitled to charge a fee for this service and will let you know what it is at the time of your request.

19. You have the right to ask us to update, correct or delete your personal information. Where we cannot delete your personal information, we will take all steps to make it anonymous. You agree that we may keep your personal information until you ask us to delete or destroy it. This is unless the law requires us to keep it.
20. We are required to collect and keep personal information in terms of the following laws:
 - 20.1. The Electronic Communications and Transactions Act (ECT)
 - 20.2. The National Credit Act (NCA)
 - 20.3. The Consumer Protection Act (CPA)
 - 20.4. The Financial Intelligence Centre Act (FICA), amongst others.

Transferring personal information outside South Africa

21. You agree that we may transfer your personal information outside South Africa:

- 21.1. if you give us an email address that is hosted outside South Africa; or
- 21.2. to administer certain services, for example, cloud services.

We will ensure that any country, company or person that we pass your personal information to agrees to treat your information with the same level of protection as we are obliged to.

Sharing personal information for merger, acquisition or sale purposes

22. If we become involved in a proposed or actual merger, acquisition or any form of sale of any assets, we have the right to share your personal information with third parties in connection with the transaction. In the case of a merger, acquisition or sale, the new entity will have access to your personal information. The terms of this Privacy Statement will continue to apply.

Changing this Privacy Statement

23. We may change this Privacy Statement at any time. The most updated version will always be available on www.sparkschools.co.za.

If you have any concerns

24. If you believe that we have used your personal information contrary to this Privacy Statement, you must first attempt to resolve any concerns with us. If you are not satisfied after this process, you have the right to lodge a complaint with the Information Regulator, under POPIA.

The contact details are:

The Information Regulator (South Africa)
SALU Building,
316 Thabo Sehume Street,
PRETORIA
Ms Mmamoroke Mphelo
Tel: 012 406 4818
Fax: 086 500 3351
infoereg@justice.gov.za