

Privacy Policy

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Definitions

Cookies	Data sent by an Internet server to a browser, which is returned by the browser each time it subsequently accesses the same server, used to identify the user or track their access to the server
Curious Callum	An access controlled eLearning platform, constructed in Moodle
Data	An unorganised collection of raw facts, without meaning in its raw form
Data Subject	The person to whom personal information relates
Information	Data that has been organised and / or structured to have meaning
ISP	Internet Service Provider
NQF	National Qualifications Framework A formal education and training framework in South Africa allowing Skills Development Providers, private and public Colleges, private Higher Education Institutions and public Universities to operate in a quality driven manner
PAIA	Promotion of Access to Information Act 2 of 2002
POPI	Protection of Personal Information Act 4 of 2013
PSET	Post-School Education and Training An education and training sector representing General Education and Training and Higher Education and Training
Pronouns “we”, “us” and “our” used in this policy	Refers to Curiosa Academy Pty Ltd - the organisation in its entirety

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Privacy Policy

Policy Statement

- Curiosa Academy Pty Ltd is a Skills Development Provider (SDP) focused on presenting innovative and logical life-long learning opportunities in post-school education and training (PSET).
- Curiosa Academy recognises the statutory requirement to comply with access to information and data privacy laws in South Africa – POPI and PAIA.
- The organisation recognises the legal, ethical and moral imperatives in processing information, and we are committed to protecting the rights of all stakeholders in the business, insofar as such rights pertain to data gathering and information processing.
- Our behaviour and actions related to data privacy and data security will reflect adherence to national statute and sectoral policies.

Policy Purpose

The purpose of this policy is to:

- Provide guidance to employees on how to maintain the required level of compliance with relevant privacy laws in South Africa, and inform stakeholders of our commitment to data privacy.
- Ensure proper management of data gathering and information processing.
- Indicate that we are aware of laws and regulations related to data privacy.
- Provide a true reflection of our adherence to data privacy policies provided by the Department of Justice, whilst operating within the ambit of the National Qualifications Framework (NQF) under which our organisation conducts its business.

Why we use data

- The organisation receives and processes data from a number of sources in order to maintain quality standards, to ensure consistency in its processes, and to remain compliant with statute pertaining to our status as an accredited SDP.
- The organisation receives, gathers and processes stakeholder data from external sources for a variety of reasons, specifically to ensure that the organisation adheres to provisions in contracts and agreements with stakeholders.

Application of Policy

- This policy applies to all employees at Curiosa Academy, to any person who purchases goods and services from the company, all stakeholders who communicate with us, all visitors to our website and all students who enrol for courses through our eLearning portal - Curious Callum.

Sources of Data

Website Anonymous visitor data (cookies) Personal details from visitors who complete the "contact-us" form	Curious Callum Learner assessment data Names & contact details	Daily correspondence eMail, Calendar Invitations
Learner portfolios Personal data 3rd party data	Contracts Client & vendor data 3rd party data from contracts	Recruitment Applicant data

Updates to Policy

- Updates to this policy are noted in the “document administration” section of this policy, with new versions of the policy made available on our website. Stakeholders may also request a copy of the policy by communicating directly with the designated Information Officer.

How We Manage Security of Data

- Employees at our organisation process and store data whilst they work on their laptops, with data undergoing a back-up procedure on a weekly basis.
- Data that has been backed up is stored in the cloud using Google Drive, for which a contract is in place with Google LLC for usage, and secure handling of our data is written into the vendor’s terms and conditions.
- Vendors and suppliers must have Privacy Policies in place in order for us to consider doing business with them.
- All laptops and storage devices are protected from illicit access with unique user names and passwords.

At Internet Service Provider (ISP) Level

Hosted platforms: our website and our learning platform (Curious Callum):

- SSL (Secure Socket Layer) Encryption - if anyone tries to intercept data as it’s being transmitted across the web, they will only see jumbled, unintelligible characters.
- Automated daily backups.
- Core system and plugins regularly updated to keep sites protected.
- Strong Administrator passwords are enforced.

Conditions for Gathering & Processing Data

Accessing & Processing Data

- We will not access your data without asking for your permission.
- User behaviour on the Website is tracked using Google Analytics - "Universal Analytics" – a tracking solution which anonymises and aggregates data about your behaviour on the Website.
- We will not ask for data that cannot be directly connected with a specific purpose.
- We will never use your data for an unlawful purpose.
- We will not process data for any purpose other than the original intent for which permission was obtained.
- We will never sell your data to any person nor to any organisation.

Transferring Data

- We will never transfer your data to any entity or person who is not involved in the transaction for which you engaged our services.
- We will never transfer your data to a third party in another country, unless it is for the purpose of meeting a legal obligation inherent to and relating to the purpose of the original request.
- We will always take cognisance of data privacy laws in other countries, when we deal with learners, customers and vendors in other countries.

Audit and Review

- We undertake to conduct regular audits of our information compliance framework, and to review related processes at least once per year.

Information Officer

- A senior person in the organisation will fulfil the role of Information Officer, as prescribed in Section 17 of the PAIA.
- The Director of the organisation is by default the designated Information Officer, and is the person who takes accountability for all matters related to data handling and processing.
- The Director has the legal mandated authority to appoint a person to take care of day-to-day matters pertaining to data privacy for the organisation.

Requests for Information

- We will provide a PAIA Manual and related forms for data subjects to request information.

Compliance Framework

- Our approach to data privacy is indicated in our Compliance Framework, Figure 1.

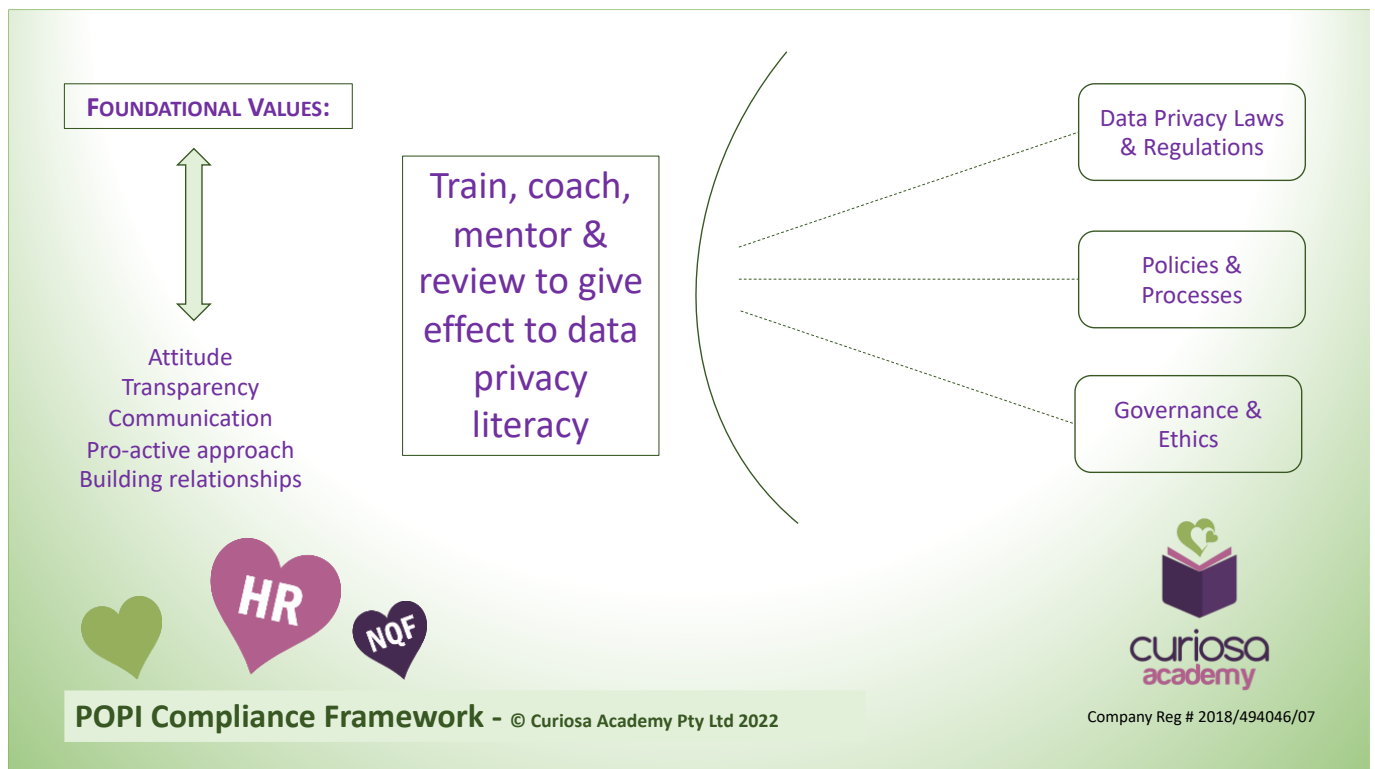



Figure 1 – Curiosa Academy POPI Compliance Framework

Laws and Regulations Related to this Policy

- The Promotion of Access to Information Act 2 of 2000
- The Promotion of Access to Information Act 2 of 2000 Regulations 2002
- The Promotion of Access to Information Act 2 of 2000 Amended Regulations 2007
- The Protection of Personal Information Act 4 of 2013
- The Protection of Personal Information Act 4 of 2013: Information Regulator: Regulations relating to the protection of personal information, 2018
- The Constitution of the Republic of South Africa 1996

Document Administration

Policy Developed By:	Heidi D Edwards	First Adopted:	2022
Approved By:	 <p>Rasheed Hargey Deputy Chairman of the Governing Board</p>	Last revised:	December 2023
Revisions:	<p>2022 – content revision. 2023 – Formatting changes and content checked for relevance.</p>		

Record Keeping

1. This policy and all related documentation must be kept in the designated shared drive on Google Drive.
2. Access to be granted only to personnel who have the authority to work with such documentation, in the normal course of performing their daily tasks..

End