MICHAELHOUSE

PRIVACY NOTICE (WEBSITE)

1. INTRODUCTION

We respect the privacy of everyone who visits this website and would therefore like to inform you of the way we would use your Personal Information. We recommend that you read this notice so that you understand our approach towards the use of your personal information. By submitting your personal information to us, you will be deemed to have given your permission – where necessary and appropriate – for disclosures referred to in this policy. By using this website, you acknowledge that you have reviewed the terms of this privacy notice and consent to use of personal information and agree that we may collect, use and transfer your personal information in accordance therewith.

Should you not agree with these terms, you may choose not to provide any personal information but this may impact on our ability to support you as a supplier, prospective employee or applicant for student enrolment.

What follows is information on how Michaelhouse processes personal data provided to us by you, in accordance with the terms of the Protection of Personal Information Act (POPIA) and section 14 of the Constitution of the Republic of South Africa, 1996, which recognises the right to privacy.

2. DEFINITION OF PERSONAL INFORMATION

According to the POPIA "Personal Information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPIA, which has more specific examples if you need them, can be found at the following link: www.gov.za/documents/download.php?f=204368

3. TYPES OF PERSONAL DATA PROCESSED BY MICHAELHOUSE

We process personal data from our students and their families and / or competent persons and also from our employees, suppliers, contractors, prospective families and third parties interested in finding out more about Michaelhouse.

PERSONAL DATA PROCESSED IS LARGELY THE FOLLOWING:

- Names, telephone numbers, email addresses, addresses, and other contact details;
- Family details;
- Safeguarding information (such as court orders and professional involvement);
- Education and employment data;
- Images, audio and video recordings, including CCTV footage (video images);
- Financial information;
- Educational centres previously attended.

Other types of data we may collect and process, according to the school's purposes, are related to health condition, criminal records and other sensitive information related to an individual, such as:

- Information about health status or provision of health care linked to a specific individual;
- Behavioural information;
- Special educational needs;

- Criminal records linked to a specific individual;
- Biometric information;
- Ethnicity;
- Religion;
- Nationality and location.

4. HOW WE COLLECT AND PROCESS PERSONAL DATA

MICHAELHOUSE COLLECTS INFORMATION IN A NUMBER OF WAYS, INCLUDING:

- Personally and over the telephone;
- Through our webpage, including information received through the following sections: contact us, registration for admission, careers (recruitment), and subscription to our newsletters;
- User-generated content, posts and other content you submit to our website and social media platforms;
- From email and hand delivered paper documentation: including job applications, emails, invoices, letters, RSVPs, and consent forms;
- Through online tools: such as apps, educational platforms and other software used by our staff;
- Through any CCTV cameras located at our premises;
- Through the security, access control, attendance and monitoring systems located at our premises, including facial and fingerprint readers, roll-call and emergency muster systems, network and device monitoring, and vehicle and visitor registration at the gates (see section 11);
- Through third parties, such as referees, professionals or authorities working with the individual.

5. PURPOSES FOR WHICH MICHAELHOUSE PROCESSES PERSONAL DATA

Michaelhouse processes personal data to legitimately and lawfully carry out the school's educational activity. The school collects and keeps students' and parents' information when it is necessary:

- To ensure that the student meets the school's admission criteria;
- To provide educational services including the support of pupil learning, monitoring and reporting on pupil progress;
- To provide for students' welfare and pastoral care services;
- To provide for students' medical attention, catering and school transportation, among other necessary services;
- To meet the educational, social, physical and emotional requirements of students;
- To operate the school's security, safety, access control, roll-call, dining, laundry and emergency systems, so that pupils can be kept safe and accounted for on campus;
- To comply with the law regarding data sharing;
- To comply with legislative or administrative requirements;
- To administer the school's governing body;
- To enable parents/guardians to be contacted in the case of emergency or in the case of school closure, or to inform parents of their child's educational progress or about school events, etc.;

- With the aims of celebrating school and individual achievements and keeping a record of the history of the school, Michaelhouse may take photographs and recorded images of students to be shared in (for example) the Chronicle, school website, social media platforms, newsletters etc., always based on informed consent from parents or students of legal age.

In the case of CVs received, with the purpose of including the candidate in the selection process or to consider their application for future positions, Michaelhouse also collects information about staff and prospective staff when necessary for:

- Conducting selection processes;
- Assessing the suitability of candidates for positions;
- Administration of staff records;
- Recruitment of staff;
- Administration of payroll, pensions and sick leave;
- Staff appraisal;
- Disciplinary procedures;
- Administration of human resources records.

6. WHO DOES MICHAELHOUSE SHARE YOUR PERSONAL DATA WITH?

Michaelhouse may be lawfully required to share personal information with relevant authorities or third parties as permitted on statutory grounds, to comply with legal obligations or on the basis of a specific consent given by the individual concerned.

Michaelhouse will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when disclosing your personal data to a third party.

Your personal data will not be rented nor sold to third parties.

7. CONSERVATION OF DATA

Personal information will only be retained for the period of time required to fulfil the purpose for which it was collected unless for a longer time for public interest archiving, scientific or historical research, statistical or alumni purposes. Once the personal information is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous. Biometric templates are deleted when a pupil leaves the school; staff templates are deleted within the period set out in the staff Time and Attendance addendum.

8. YOUR RIGHTS

Under the POPIA you have rights regarding the processing of your personal data. These rights are, however, subject to certain exemptions and limitations.

You have the right to:

- Be informed, at the time when personal data is collected, about the data processing.
- Access the information we process and how we process it and also to obtain a copy of the personal data considering the legal limitations and exceptions.

- Ask for the erasing of the personal data we hold about you without undue delay considering the legal limitations and exceptions.
- Obtain the rectification of your personal data providing a supplementary statement.
- Obtain restriction of processing of your personal data when it is inaccurate, illegal, unnecessary or not verified, considering the legal limitations and exceptions.
- Obtain data portability of your personal information in a structured, commonly used and machine-readable format. This allows the right to transmit that data to another controller without hindrance from the controller to which the personal data has been provided.
- Object to processing for direct marketing purposes.
- Withdraw consent at any time to the processing of your personal data. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Therefore, in accordance with Section 5 of POPIA referring to rights of data subjects, individuals will be able to exercise their rights by sending a written specific request, along with a copy of their ID card, to Michaelhouse.

Data subjects have the right to request, where necessary, the correction, destruction or deletion of their personal information and to object, on reasonable grounds relating to their particular situation, to the processing of their personal information.

Data subjects have the right to a response to a request without undue delay from the date of the request although Michaelhouse can extend the time limit to respond to it if necessary. Any request made to Michaelhouse must be provided in clear and plain language.

Any request is subject to certain exemptions, limitations or contractual obligations. Data belonging to or identifying other individuals is exempt from right of access and will be subject to legal privilege. Michaelhouse cannot disclose confidential information pertaining to any of our staff.

9. CONSENT

You will have the right and possibility to withdraw your consent for any specific purpose granted at any given time without prejudice of the legality of processing according to the consent given before withdrawal.

10. STORING AND SECURING INFORMATION

Michaelhouse will use the appropriate technical and organisational measures to ensure the security, confidentiality, integrity and privacy of the personal data, and prevention of unauthorised access or unlawful processing or accidental loss, destruction or damage of the files.

11. SECURITY AND MONITORING SYSTEMS

Michaelhouse operates a number of systems on its premises to keep pupils, staff and visitors safe and to control access to the campus and its buildings. This section explains what those systems process.

Facial and fingerprint readers. The school uses facial and fingerprint readers to control access to boarding houses and buildings, to run roll call, dining and laundry, and to produce the headcount used in a fire or other emergency. These readers apply to all pupils as a condition of attendance and form part of the school's duty of care while pupils are in its charge. The readers store a template, which is a set of numbers calculated from a face or fingerprint rather than a photograph that can be browsed, together with the person's name, school or staff number and a record of each scan (reader, location, date and time).

Templates and scan records are held on the school's own systems within South Africa and are not sent to any external or cloud-based recognition service. Access is restricted by role; only IT administrators can reach the templates, for enrolment, support and deletion. Scan records are not used in disciplinary processes.

CCTV. CCTV cameras operate across the campus for the security of persons and property. Signage is displayed at the entrances. Footage is retained for a limited period and is reviewed only for security, safety and incident purposes, or where the school is lawfully required to provide it.

Network and device monitoring. The school monitors use of its network, internet connection and school-managed devices, including device location, to keep pupils safe online, to protect its systems and to comply with its acceptable-use policies.

Vehicles and visitors. Vehicle registration details and visitor and contractor records are collected at the school gates for access control and security.

Staff. Staff use of these systems, including time and attendance, is dealt with in the relevant employment documents issued by Human Resources.

Questions about any of these systems may be addressed to the school's Information Officer, the Rector.

12. COMPLAINTS

If you are not satisfied with our response, or if you would like to discuss any aspect of this privacy notice, or if you believe we are processing your personal information disregarding the data protection regulations in force, your claim can be sent in writing to the school or to the Information Regulator addressed at:

Address: 33 Hoofd Street, Forum III, 3rd Floor Braampark, P.O. Box 31533, Braamfontein, Johannesburg, 2017

Phone number: +27 (0) 10 023 5200

Cell number: +27 (0) 82 746 4173

or by email at: complaints.IR@inforegulator.org.za / enquiries@inforegulator.org.za

13. PRIVACY NOTICE UPDATES

Michaelhouse may need to update this privacy notice periodically so we recommend that you review this information from time to time.