

Valued client

## **IMPLEMENTATION OF THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 ("POPIA")**

The privacy of our parents and learners are of utmost importance to us. We acknowledge the gravity of ensuring that your personal information is handled with care.

When you engage with us (regardless of the method), you may be asked to provide us with your personal information. The reason for this is to enable us to confirm your identity for the purpose of assisting in matters pertaining to your account. This personal information may refer to either the Brainline parent / legal guardian, and/or learner.

This communication pertains/seeks to:

- The nature of personal information that we require.
- The reason for our collection of your personal information.
- What our justification is for processing your personal information.
- Inform you of how we process your personal information.
- Advise you of your rights in relation to your personal information.
- Request your help to keep your personal information accurate and updated.

### **The nature of the personal information that we require**

Some of the personal information that we require include, for example, your first name, surname, contact details, and ID numbers. For a comprehensive list, please refer to our our POPI Act Policy & Standard here: xxxx.

### **The reason for our collection of your personal information**

Assessment and examination results are intricately linked with the profile of the Brainline learner, and, as most learners are minors, it is then inevitably link to the parent or legal guardian. For this reason, no resulting can be done without personal information.

### **What is our justification for processing your personal information?**

We are both a Responsible Party and a Process Operator in terms of POPIA with respect to your personal information. By virtue of your enrolment with us, your personal information is required so that we may provide you with an educational service.

### **How do we process your personal information?**

Brainline only uses the personal information which you provide for purposes relating to our legitimate business operations, and to comply with our obligations towards you as a Brainline parent / legal guardian, or learner. Some of the purposes for which we process your personal information may include:

- To provide or manage any information, products changes and/or services requested by you.
- To establish your needs and preferences in relation to the products and/or services that we provide.
- To help us identify you when you contact us.
- To facilitate the delivery of products and/or services to you.
- To administer any product-related queries.
- To allocate unique identifiers for the purpose of securely storing, retaining and recalling such information from time to time.
- To maintain your records.
- For general administration purposes.
- To notify you of any important academic-, product-, or other related changes and updates that is of concern to you.
- To notify you of additional products and/or services that may be of interest to the Brainline learner in support of their academic journey.

- Use in internal communications between teachers, Brainline personnel, in support of the academic journey of the learner.

We may be required to share your personal information with some of our suppliers (for example, digital book supply platforms), service providers (for example, the Independent Examination Board) and business partners (system developers) to ensure seamless service delivery to you on your academic journey. Our service providers, suppliers and business partners have legal agreements with Brainline by which they are legally bound to keep your personal information secure and confidential, and to exclusively use it for the purposes for which they have been contracted.

### **What are your rights and what do we need from you?**

While we take steps to safeguard your personal information, process it lawfully and only share it with suppliers, service providers and business partners who we trust, you have the following rights:

- You have the right to ask us to confirm what personal information we have in relation to you.
- You have the right to ask us which of your personal information is shared with our suppliers, service providers, business partners or any other third party.
- You have the right to request us to update your personal information or even delete any information which is no longer accurate.
- You have the right to object to the processing of your personal information. However, kindly note that this may negatively influence our ability to fulfil our obligations towards you as a Brainline parent / legal guardian or learner.

### **What can you do if you suspect an information breach?**

We have and continue to implement reasonable security measures and protocols to protect the personal information we hold. These measures seek to protect any personal information we hold from being disclosed without authorisation, from loss, damage, destruction or unauthorised access.

As you will appreciate, no security system is infallible. Accordingly, we request that, if you suspect that either you, or we, have had an information security breach, you should notify us immediately so that we can take appropriate action. You can notify us by emailing us at [io@brainline.com](mailto:io@brainline.com).

### **Maintaining your personal information with Brainline**

In anticipation of the full enforcement of POPIA, which is scheduled to commence on 1 July 2021, we are in the process of taking various compliance steps and implementing our POPIA compliance framework. One of the key compliance steps we are taking is to ensure that your personal information as our existing member is accurate and complete.

This is an undertaking in respect of which we require your assistance by verifying the accuracy of the personal information in our enrolment platform [www.mybrainline.com](http://www.mybrainline.com). If there are any changes to your personal information, we request you to please update all required information by logging into your profile on [www.mybrainline.com](http://www.mybrainline.com), using the P-number and password supplied in your Welcome Email, and updating your details by 30 June 2021.

After the aforesaid date, we will accept that your personal information which we currently hold is correct and accurate.

As we need to confirm that you agree to the afore-mentioned terms and conditions, you will be prompted to accept them when next you log in to [www.brainonline.com](http://www.brainonline.com). As stated, please be aware that your rejection of these terms and conditions may negatively influence our ability to fulfil our obligations towards you as a Brainline parent / legal guardian or learner.

Should you have any queries, please do not hesitate to call us on 012 543 5000 or email us on [info@brainline.com](mailto:info@brainline.com). You are also welcome to view our POPI Act Policy & Standard here: xxxx.

We wish to thank you for taking the time to assist us in keeping your personal information safe.

Kind regards,

The Brainline Team