



PRIVACY POLICY

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1. About this Privacy Policy

This Privacy Policy applies to our collection, use and processing of your Personal Information; and, in some instances, your Special Personal Information. Please pay special attention as this policy contains information about provisions which have special consequences.

Constantia Kloof Primary School (CKPS) strives to ensure that our use of Personal Information of data subjects is lawful, reasonable, and relevant to our school's activities, with the ultimate goal of improving our offerings and your experience.

Reference to "CKPS", "we", "us" or "our" in this policy means Constantia Kloof Primary School with EMIS number 700250092 and conducting business as a school.

CKPS is a responsible party (or data controller, in some jurisdictions) in respect of your Personal Information and Special Personal Information which means that CKPS determines the purpose of and means for processing your Personal Information.

CKPS is committed to protecting and respecting your privacy. We strive to ensure that our use of your Personal Information is lawful, reasonable, and relevant to our school activities, with the ultimate goal of improving our services and your experience. CKPS seeks to employ best practice when it comes to the collection and processing of Personal Information in accordance with data protection or privacy legislation.

We have appointed an Information Officer who is responsible for overseeing questions in relation to the Privacy Policy. You may contact our Information Officer at info@ckps.co.za to discuss this Privacy Policy or your rights under data protection legislation that is applicable to you.

This Privacy Policy sets out what we will do with any Personal Information we collect from or about you, or that you provide to us, when you use our services, including our websites and student portals (which we also collectively refer to in this Privacy Policy as the "Website") or when you enrol at our school. Please read this Privacy Policy carefully to understand our views and practices regarding your Personal Information and how we will treat it.

This Privacy Policy must, as is appropriate, be read together with CKPS's other documents or agreements between CKPS and you (the "Agreements") that describe the manner in which we, in specific circumstances, collect or process Personal Information about you. This will enable you to understand the manner in which we will process your Personal Information. This Privacy Policy supplements such Terms and Agreements, but does not supersede them and in the event of any conflict, ambiguity or inconsistency between this Privacy Policy, the Terms and/or the Agreements, such documents shall be construed in the following order of priority:

- this Privacy Policy;
- the Terms; and
- the Agreements.

2. Application of this Privacy Policy

This Privacy Policy applies to the processing by us or on our behalf, of the Personal Information relating to you, being a user who accesses and/or uses our Website or our services, or a provider of products and services to us, clients, suppliers, former employees, prospective employees and other data subjects that engage with us. This Privacy Policy applies regardless of the device which you use to access our Website or to engage with us,

which device is capable of using, or enabled to use, the Website including, but not limited to, internet-connected mobile devices and tablets (the "Access Device").

This Privacy Policy does not apply to any third parties, including to websites of any other parties, or the applications, products or services such websites advertise and which may be linked to our Website, or websites that link to or advertise on our Website. We are not responsible for the privacy practices of such third-party websites, or for any claims, loss or damage arising from these. We advise you to read the privacy policy of each third-party website and decide whether you agree to their privacy practices and policies, as these third-party websites may also be collecting or sharing your Personal Information and Special Personal Information

3. The Personal Information that we collect about you

CKPS may collect, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your Personal Information in a way set out in this Privacy Policy. When we do one or more of these actions with your Personal Information, we are "Processing" your Personal Information.

"Personal Information" is defined in Section 1 of the Protection of Personal Information Act 4 of 2013 and refers to private information about an identifiable persons (which includes natural persons as well as juristic persons, such as companies or trusts). Personal Information does not include information that does not identify a person (including in instances where that information has been de-identified). The type of Personal Information that we collect about you may differ on the basis of the services that you receive from CKPS.

We may process different kinds of Personal Information about you which we have grouped together as follows:

- Identity Information, which includes information concerning your name, surname, username or similar identifier, marital status, title, occupation, interests, date of birth, gender, race and legal status, as well as copies of your identity documents, photographs, identity number, registration number and qualifications.
- Contact Information, which includes billing addresses, delivery addresses, email addresses and telephone numbers.
- Financial Information, which includes bank account and payment card details, insurance information, salary, tax and financial statements.
- Transaction Information, which includes details about payments to you or received from you.
- Technical Information, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the website or engage with us.
- Usage Information – which includes information as to your access to and use of the Website, and services, such as what links you went to, what content you accessed, the amount of content viewed and the order of that content, as well as the amount of time spent on the specific content and what products and services you access and use when engaging with CKPS;
- Location Information – which includes geographical information from your Access Device (which is usually based on the GPS or IP location);
- Security Information, which may include records of your access to our facilities, as well as CCTV camera footage of you on or nearby our premises; and
- Marketing and Communications Information, which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If any of the information you provide to us contains special Personal Information such as health, religion, ethnic origin or race, trade union membership, political persuasion or information about your criminal offences or convictions, your consent is the lawful basis on which we rely to process such information unless any other lawful basis exists allowing us to process such information.

If any information you provide to us contains the processing of Personal Information of children (minors), for instance information given to us about a child during a complaint resolution process, this processing of Personal Information of children may only be carried out with the prior consent of the competent person such as a parent or legal guardian, unless lawful basis exist allowing us to process such information without the aforementioned consent.

We do not provide services directly to children, and our site is not available for use by any person under the age of 18 years without consent and supervision from a competent person such as parent or a legal guardian. This Privacy Policy also applies in a case where a child makes use of our website with the consent from a competent person. Use of our website by a child without the relevant consent from a competent person is prohibited.

CKPS may also utilise automated processing to process your Personal Information.

CKPS may also process, collect, store and/or use aggregated data, which may include historical or statistical data ("Aggregated Data") for any purpose, including for knowhow and research purposes. Aggregated Data may be derived from your Personal Information but is not always considered Personal Information, as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information in a manner that has the result that it can directly or indirectly identify you, we will treat the combined data as Personal Information, which will be managed in accordance with this Privacy Policy.

Additional information may be collected with the consent of the data subject, or the responsible adult if the data subject is under 18 years of age.

Any information which a data subject makes public through advertising, publishing on social media or through any other public communication medium or event is not protected in terms of this Privacy Policy.

The school makes use of CCTV in the school's classrooms, offices, corridors, walkways, and venues to which the public has access, without consent but with a notice displaying that CCTV is used.

There is no expectation of privacy in the open spaces of the school's property and any venue open to the public, or at any event off the school's property but in an open space or venue open to the public.

There is an expectation of privacy in school toilets and changing rooms.

4. How we collect your Personal Information

We collect your Personal Information in three ways, namely:

- through direct or active interactions with you;
- through automated or passive interactions with you; and

- from third parties.

Direct or active collection from you:

We may require you to submit certain Personal Information in order for you to access certain portions of the website and to enable us to provide certain services to you (e.g. providing further requested information, applying for a vacancy, enrolling in the school, etc.) or to conclude an agreement with us, or to fulfil our statutory obligations. We also collect information directly from you when you communicate directly with us, for example via e-mail, telephone calls, feedback forms, site comments and forums. If you contact us, we may keep a record of that correspondence. The information we may actively collect from you may include any of the information listed in section 2 of this Privacy Policy.

Passive collection from your Access Device:

We passively collect some of your Personal Information from devices that you use to access and navigate through the website or to access any network administered by CKPS (each an "Access Device"), using various technological means. The information which we passively collect from your Access Device may include your Identity Information, Contact Information, Financial Information, Transaction Information, Technical Information, Usage Information, Location Information, Security Information and Marketing and Communications Information, and any other information which you permit us, from time to time, to passively collect from your Access Device.

Information collected from third parties:

CKPS may receive Personal Information about you from various third parties and public sources and will treat that information with due care.

In accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"), when Personal Information is collected, CKPS will take reasonably practicable steps to ensure that you are made aware, at the point of collection, of whether the provision of such Personal Information is voluntary or mandatory.

Where the supply of Personal Information is mandatory, CKPS will, where applicable, inform you of the legal or contractual basis requiring such collection, as well as the consequences of any failure to provide the requested information.

In accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"), CKPS will take reasonably practicable steps to ensure that, at the point of collection, you are made aware of the consequences of any failure to provide the requested Personal Information.

Such consequences may include, but are not limited to, CKPS's inability to:

- provide the requested products or services;
- comply with legal obligations; or
- effectively engage with or respond to you.

5. How the information collected is used

Personal Information provided to CKPS by you will only be used for the purposes stated when the Personal Information is requested.

We may use your Personal Information:

- for administration of learner enrolment, class placements, and granting awards;
- to provide learners with appropriate education and support

- to administer our various education programs and to monitor learners' academic progress. We are legally required to provide certain records relating to the progress of a learner (under 18 years) in his/her education to the learner's parents/guardians, including results of examinations.
- to care for the health and well-being of staff and learners,
- for administration of matters concerning parents, including fees, exemption applications, insurance claims, school SGB elections voters' roll, communication,
- for administration of matters concerning staff,
- to process appeals, resolve disputes, and defend litigation etc.,
- for the conducting of disciplinary processes of learners and staff,
- to comply with our legal obligations as a public school in terms of the South African Schools Act of 1996, as amended and any provincial education law,
- to comply with our monitoring and reporting obligations to National and Provincial Government departments in terms of the South African Schools Act of 1996, as amended and
- to comply with any law or order of court;
- to protect our rights in any litigation;
- to operate our facilities;
- to comply with our statutory obligations, including submissions to the Companies and Intellectual Property Commission, as well as interacting with regulatory authorities
- to conduct business case analysis;
- to conduct CKPS's recruitment exercises, including referrals, and hiring processes, including the capturing of a job applicant's details and the providing of status updates to such a job applicant. In this context CKPS will conduct criminal record and credit checks;
- to retain and make information available to you on the website;
- to provide you with marketing that is relevant to you, or to direct information concerning CKPS;
- maintain and update our learner databases;
- to establish and verify your identity on the website;
- diagnose and deal with technical issues, customer support queries and other user queries;
- operate, administer, maintain, secure and develop the Website and the performance and functionality of the website;
- detect, prevent or deal with actual or alleged fraud, security or the abuse, misuse or unauthorised use of the Website and/or contravention of this Privacy Policy or any of the terms and conditions that apply to the use of the website;
- communicate with you and keep a record of our communications with you and your communications with us;
- inform you about any changes to the Website, the Privacy Policy or other changes which are relevant;
- to create user profiles and analyse and compare how you and other users make use of the Website, including (without limitation) habits, click-patterns, preferences, frequency and times of use, trends and demographics;
- to analyse and compare the kinds of Access Devices that you and other users make use of and where you are using them; and
- for any other purposes relevant to our school activities, provided they are lawful.

Demographical and statistical information about user behaviour may be collected and used to analyse the popularity and effectiveness of CKPS's website. Any disclosure of this information will be in aggregated and anonymised form and will not identify individual users.

CKPS will restrict its processing of your Personal Information to the original purposes for which it was collected, unless CKPS reasonably considers that it is required to be processed for another purpose and that purpose is compatible with the original purpose. If you would like us to explain how the further processing for the new purpose is compatible with the original purpose, please contact us.

6. Sharing of your Personal Information

We will not intentionally disclose, for commercial gain or otherwise, your Personal Information other than as set out in this Privacy Policy or without your permission.

The level of sharing and the nature of what is shared depend on various factors. The Government bodies to which we transfer your personal information will use your personal information for their own purposes (including to verify other information they already hold about you, etc.) and they may aggregate it with other information they already hold about you and your family.

CKPS may share your Personal Information under the following circumstances:

- to
- to our agents, advisers, service providers and suppliers which have agreed to be bound by this Privacy Policy or on terms which offer the same level of protection as this Privacy Policy;
- to our employees, suppliers, service providers and agents if and to the extent that they need to know the information in order to provide the services for or to us for which they have been appointed, such as hosting, development and administration, technical support and other support services relating to the Website or the operation of the CKPS business. We will authorise any information processing done by a third party on our behalf, amongst other things by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions;
- in order to enforce or apply any other contract between you and us;
- in order to protect our rights, property or safety or that of our customers, employees and prospective employees, contractors, candidates and prospective candidates, suppliers, service providers, agents and any other third party;
- in order to mitigate any actual or reasonably perceived risk to us, our customers, employees and prospective employees, contractors, candidates and prospective candidates, agents or any other third party; and
- to National and Provincial Government bodies and other governmental agencies, and other regulatory or self-regulatory bodies if required to do so by law or if we reasonably believe that such action is necessary to:
 - comply with the law or any legal process;
 - protect and defend the rights, property or safety of CKPS, or our learners and prospective learners, parents and prospective parents, legal guardians and prospective legal guardians, employees and prospective employees, contractors, suppliers, service providers, agents or any third party;
 - detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorized use of the Website and/or contravention of this Privacy Policy; and
 - protect the rights, property or safety of members of the public. If you provide false or deceptive information about yourself or misrepresent yourself as being

someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities.

7. Cross-border transfer

We do not transfer your personal information to another country or international organisations.

8. Automated decision making / profiling

We do not engage in automated decision making or profiling.

9. How we store information collected

Personal Information is held only as long as is necessary to provide the services to you or as may be required in terms of legislation (including prescription periods), school requirements and whichever period is the longest. The details of this are available on request to the CKPS Information Officer.

Personal Information that you provide to us will be stored electronically on our servers or those of our service providers, as well as in hard copy format (at times), with reasonable organisation and technical safeguards in place to protect this Personal Information. However, we do work with third party contractors, some of whom host and operate certain features of the website.

If you subscribe for data, news, announcements, alerts or any such information to be emailed to you from CKPS, we will hold your details on our database until such time as you chose to unsubscribe from this service. You may do this at any stage by selecting the appropriate option in the alerts section of this site.

We may keep and process some or all of your Personal Information if and for as long as:

- we are required or permitted by law or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.
- Certain personal information of learners such as learner annual promotion schedules is retained for as long as it is in the interests of the data subjects to retain it.

To determine the appropriate retention period for Personal Information, CKPS will consider, among other things, the quantity, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means. CKPS will always comply with applicable legal, regulatory, tax, accounting or other requirements as they pertain to the retention of Personal Information.

10. Quality and protection of your information

We make every effort to keep the Personal Information we hold updated, complete and accurate. It is your duty to provide CKPS with your most up to date Personal Information and you can do so in the following ways: info@ckps.co.za.

CKPS strives to ensure the security of Personal Information we hold by taking reasonable measures to prevent destruction, unlawful access and loss of Personal Information. Any compromise of data integrity or confidentiality will be reported to you by written notice.

Even by taking the above measures when processing Personal Information, we do not guarantee that your Personal Information is 100% secure.

Please contact us by email at the aforesaid email address if you:

- Require access to any of your Personal Information we have on our database; or
- Wish to notify us of any change, modification or correction; or
- Would like to have your Personal Information removed from our records.

We will require suitable proof of identity from you before we can action any of the above requests.

11. How we use “cookies”

In so far as our web pages use “cookies”, a cookie is a small file of letters and numbers that we place on your computer or mobile device. These cookies allow us to distinguish you from other users and assist us to provide you with a good experience when browsing our website. It also allows us to improve our website.

12. Access to information

The Promotion of Access to Information Act, 2000 gives you the right to access information held about you. For further information about this right and how to exercise it, please see CKPS’s PAIA Manual available on this website.

13. Your rights

Please note that, under certain circumstances, you may have rights under data protection laws in relation to your Personal Information. You may have the right to:

- Request access to your Personal Information (commonly known as a "data subject" access request"). This enables you to receive a copy of the Personal Information that CKPS has about you. We may refuse your request for access or disclosure of your Personal Information if any of the grounds permitted in law apply.
- Request correction of the Personal Information that we hold about you. This enables you to ensure that any incomplete or inaccurate data that CKPS holds about you is corrected. To exercise this right, you should contact us via email and inform us that your data is incomplete and/or inaccurate. You will need to point out what you believe is inaccurate or incomplete and explain to us how we should correct or complete it as well as provide us with the evidence of inaccuracies where available. On receipt of your request we will, as soon as reasonably practicable, correct or complete your Personal Information.
- Request erasure of your personal data. This enables you to request that CKPS delete or remove Personal Information where there is no lawful basis for us continuing to process or retain it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to the processing thereof where we may have processed your information unlawfully or where we are required to erase or de-identify your Personal Information to comply with applicable law. CKPS may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Withdraw consent at any time where we are relying on consent to process your Personal Information. This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at any time you withdraw your consent. Please note that we may continue to process your Personal Information in certain instances where we are not relying on your consent.
- Right to object. You have a right to object in accordance with applicable data protection or privacy legislation, at any time, from us processing or using your Personal Information and we may no longer process your Personal Information. Should you require to exercise your right to object, you should inform us that you do not want us to process your Personal Information and state the reasons why we should stop using such Personal Information to which you object. Should we not have any lawful basis for processing the information you object to, we would stop using such Personal Information objected to successfully, unless data protection or privacy legislation or other agreements with you provide us with a lawful basis for or justifies us in continuing to process such information, and we will inform you of the result of your objection.
- Right of protection against automated processing. You have the right not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your Personal Information intended to provide a profile of you.
- Right to submit a complaint. You have the right to submit a complaint to the Regulator regarding the alleged interference with the protection of the Personal Information of any data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator.
- Right to institute civil proceedings. You have the right to institute civil proceedings regarding the alleged interference with the protection of your Personal Information.
- Right to lodge a complaint to the Information Regulator. You have the right to lodge a complaint to the Information Regulator, having regard to the specific circumstances in which the information is or is not to be processed.

The Information Regulator can be contacted at:

Physical Address Woodmead North Office Park
54 Maxwell Drive, Woodmead,
Johannesburg, 2191

Telephone number: + 27 (0)10 023 5200

Email: POPIAComplaints@info regulator.org.za

E-Service Portal: [eServices: Information Regulator](#)

Website: <https://info regulator.org.za/>

14. Direct marketing

Through your engagement with us you may be requested whether you agree to receive marketing communications from us. You may refuse, accept, require us to discontinue, or pre-emptively block any approach or communications from us if that approach or communication is primarily for the purpose of direct marketing ("direct marketing communications").

You may opt out of receiving direct marketing communications from us at any time by requesting us (in the manner set out in the communication or by contacting us at the contact

details set out in clause 17) to desist from initiating any direct marketing to you. If you have opted out, we may send you written (which may include electronic writing) confirmation of receipt of your opt out request, and not send you any further direct marketing communications. Please note that you may continue to receive communications from us that are not marketing related.

15. Consumer Protection Act and Protection of Personal Information Act

If this Privacy Policy or any provision in this Privacy Policy is regulated by or subject to the Consumer Protection Act 68 of 2008, the Protection of Personal Information Act 4 of 2013 ("POPIA"), or other laws, it is not intended that any provision of this Privacy Policy contravenes any provision of the Consumer Protection Act, POPIA or such other laws. Therefore, all provisions of this Privacy Policy must be treated as being qualified, to the extent necessary, to ensure that the provisions of the Consumer Protection Act, POPIA and such other laws are complied with.

No provisions of this Privacy Policy:

- does, or purports to limit or exempt us from any liability to the extent that the law does not allow such a limitation or exemption;
- requires you to assume risk or liability for the kind of liability or loss, to the extent that the law does not allow such an assumption of risk or liability; or
- limits or excludes any warranties or obligations which are implied into this Privacy Policy by the Consumer Protection Act (to the extent applicable), POPIA (to the extent applicable), or other applicable laws or which we give under the Consumer Protection Act (to the extent applicable), POPIA (to the extent applicable), or other applicable laws, to the extent that the law does not allow them to be limited or excluded.

16. General

Governing Law – You agree that this Privacy Policy, our relationship and any dispute of whatsoever nature relating to or arising out of this Privacy Policy whether directly or indirectly is governed by South African law, without giving effect to any principle of conflict of laws.

Non-Cession – You agree that we may, at any time, transfer, cede, delegate or assign any or all of our rights and obligations under this Privacy Policy without your permission. We will notify you if we transfer, cede, delegate or assign any rights or obligations to a third party, but we do not have to notify you if we transfer, cede, delegate or assign any rights or obligations to any person which acquires all or part of our business and/or assets. We may in certain instances, also sub-contract our obligations, for example, engaging with external IT service providers or printers. Where we engage such sub-contractors, we will do so without your permission and we do not have to notify you if we sub-contract any of our obligations.

Successors and Assigns – This Privacy Policy shall apply for the benefit of and be binding on each party's successors and assigns.

Non-Waiver – Our failure to exercise or enforce any right or provision of this Privacy Policy shall not constitute a waiver of such right or provision.

Severability – Each provision of this Privacy Policy, and each part of any provision, is removable and detachable from the others. As far as the law allows, if any provision (or part of a provision) of this Privacy Policy is found by a court or authority of competent jurisdiction to be illegal, invalid or unenforceable (including without limitation, because it is not consistent

with the law of another jurisdiction), it must be treated as if it was not included in this Privacy Policy and the rest of this Privacy Policy will still be valid and enforceable.

Amendments – Any subsequent revisions or updates to this Privacy Policy will be posted on this page and will take effect immediately upon publication.

17. Queries and the Information Regulator

Please first give us a chance to resolve any query or complaint by contacting our Information Officer. Should you feel that your rights in respect of your Personal Information have been infringed, please address your concerns to the Information Officer at info@ckps.co.za.

If you feel that the attempts by CKPS to resolve the matter have been inadequate, you may lodge a complaint with the South African Information Regulator by accessing their website at <https://inforegulator.org.za/>.

If you are located outside of South Africa, you may contact the appropriate regulator in your country of domicile.

For any request for correction or deletion of Personal Information or destroying or deletion of records of Personal Information in terms of Section 24(1) of the Protection of Personal Information Act 4 of 2013, please see the template contained in the school's PAIA Manual (available on the school website).

Ratification of: Privacy Policy

APPROVED BY	NAME & SURNAME	SIGNATURE	DATE
SGB Chairperson:	Mrs M Dube		27/08/26
SGB Secretary:	Mrs J Smuts		2026-08-27
Principal:	Mrs K Bergsma		2026-08-27

Date of next review:	Changes made Y/N	SGB Chairperson:	SGB Secretary:	Principal:

RATIFIED BY GDE	NAME & SURNAME	SIGNATURE	DATE
District Official:			
District Official:			
District Official:			
District Official:			
District Official:			

GAUTENG DEPT. OF EDUCATION CONSTANTIA KLOOF PRIMARY SCHOOL 2026 -08- 27 TEL: 011 475-1330 FAX: 011 475-5298 P.O. BOX 50, FLORIDA 1710 DISTRICT D12
