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1. INTRODUCTION

The Privacy Policy explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act(POPIA).

According to the Act “personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

Throntree Preparatory School takes data protection seriously and we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

2. PURPOSE

This document is the undertaking of Thorntree Preparatory School to conform to the POPI act.

It provides detailed information as to the manner in which we undertake to comply with POPI.

The Protection of Personal Information Act No 4 of 2013 (POPI) promotes the protection of personal information and the retention of documents by public and private entities. This

policy guides the way in which all employees of Thorntree Preparatory School are required to use, disclose and destroy personal information appropriately, transparently, securely and in accordance with applicable laws. It also stipulates for what purpose this information will be used.

Our Information Officer can be contacted by email on hpope@thorntreeprep.co.za if you have any queries regarding your personal data.

3. SCOPE

This policy and procedure applies to all employees, board members, parents and pupils of

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Thorntree Preparatory School.

4. TYPES OF PERSONAL DATA WE PROCESS

We process personal data about prospective, current and past: pupils and their parents; staff, suppliers and contractors; donors, friends and supporters; and other individuals connected to or visiting Thorntree Preparatory School. The personal data we collect, process and store will be personally identifiable information related to pupils and their parents, staff, suppliers and contractors, donors, friends and supporters. The personal data processed includes recorded information that is true and correct and/or video and photographic images about an individual.

Information collected by Thorntree Preparatory School includes;

- names, addresses, identity numbers, telephone numbers, email addresses and other contact details;
- family details, marital status and number of dependents;
 - admissions, academic, disciplinary and other education related records,
- information about special
 - educational needs, references, examination scripts and marks;
- attendance information (such as number of absences and absence reasons);
 - education and employment data;
- images, audio and video recordings;
 - financial information, including bank details and credit history;
- education and schooling history.

Other types of data we collect, process and store includes protected health and medical information, criminal record information and other sensitive information related to an individual. Information such as;

- health status or provision of healthcare linked to a specific individual;

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- criminal records linked to a specific individual; and
- characteristics (such as race and/or ethnicity, religion, language, nationality and country of birth)

5. HOW WE COLLECT PERSONAL DATA

Thorntree Preparatory School collects information in several ways, including but not limited to:

- in person and via electronic means;
- from students, their family members, staff, volunteers, visitors, job applicants and others;
- from electronic and paper documentation: including job applications, emails, invoices, enrolment forms,
- letters to our school body, consent forms, our school's website or school-controlled social media;
- through online tools: such as apps and other software used by our school as well as website cookies;
- through any CCTV cameras located on the school campus;
- through third parties, such as referees, previous schools, professionals or authorities working with the
- individual;
- through publicly available resources.

6. PURPOSE FOR WHICH WE PROCESS PERSONAL DATA

Thorntree Preparatory School processes personal data to lawfully and legitimately support the school's operation as an independent school. Our school collects information about students and their families when necessary to:

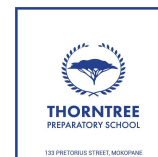
- select and admit students;
- educate students and support pupil learning; (including online learning when necessary)
- to monitor and report on pupil progress including providing academic reporting on each student and

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- publishing of results;
- provide references for current and past pupils;
- to provide appropriate pastoral care, support students' social and emotional well-being, and health;
- support operational management of the school including administration of pupil records; the
- administration of invoices, fees and accounts; the management of the school's property; the
- management of security and safety arrangements (including the use of CCTV; management planning and
- forecasting; research and statistical analysis; the administration and implementation of the school's
- rules and policies for pupils and staff; the maintenance of historic archives and other operational
 - purposes;
- fulfil legal requirements;
- take reasonable steps to reduce the risk of reasonably foreseeable harm to students, staff and visitors
 - (duty of care);
- make reasonable adjustments and support for students with special needs;
- provide a safe and secure working and school environment;
- communicate with parents about students' schooling matters and celebrate the efforts and
- achievements of students;
- maintain the good order and management of our school;
- promote the school on our school's website or school-controlled social media, the school prospectus, in
- the weekly newsletter, in the annual magazine (online or hard copy) and other publications and
- communications conducted by the school;
- promote the school in local newspapers and/or online platforms to celebrate the efforts and

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- achievements of pupils.

Our school collects information about staff, prospective staff and contractors when necessary

for:

- the administration of staff records;
- the recruitment of staff;
- the engagement of contractors;
- administration of payroll, pensions and sick leave;
- staff appraisal;
- disciplinary procedures;
- administration of human resources records;
- providing references.

7. HOW WE PROCESS PERSONAL INFORMATION

As a school, Thorntree Preparatory School is lawfully required to share personal information

with relevant authorities such as:

- the Department of Education;
- government services such as Visa and Immigration, Revenue and Customs; and
- other third party professional services as necessary i.e. the police.

Our members of staff collect, process and store personal information only for the purpose for which it is intended.

We routinely share pupil information with:

- schools that pupils attend after completion of Grade 7 or schools to which pupils wish to transfer to;
- medical institutions should a child fall sick or be injured whilst at school.

When sharing data with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information over which we exercise control is kept secure and used only in accordance with the school's specific

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directions. We

will ensure that anyone to whom we pass personal information agrees to treat such information with the same level of protection as we are obligated to.

8. HOW LONG DO WE KEEP PERSONAL DATA

We retain personal data only for a legitimate and lawful reason and time period as required

by law. At a minimum, pupil data will be held for the duration of time each child remains a

pupil of Thorntree Preparatory School. Our Information Officer can be contacted by email on

hpope@thorntreeprep.co.za if you have any queries regarding the retention of your personal data

9. YOUR RIGHTS

Under Data Protection Law anyone who we collect personal information about has rights

regarding the collection, processing and storage of their personal data. These rights are,

however, subject to certain exemptions and limitations.

You have the right to:

- access and understand the personal data we hold about you;
- access and understand the personal data we hold about your child;

- ask for the personal data we hold about you and/or your child to be erased (this is with limitations and
- exceptions as we may have lawful reason to hold such data);

- ask for the personal data we hold about you and/or your child to be amended;
- ask us to stop processing such data (this is with limitations and exceptions as we may have lawful
- reason to process such data);

- withdraw consent to process your personal data or your child's personal data (this is with limitations and
- exceptions as we may have lawful reason to process such data regardless of consent)

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Our Information Officer can be contacted by email on if you have any queries regarding your rights. Any request for data we store and process about you must be completed in writing.

10. SUBJECT ACCESS REQUESTS AND CORRECTION OF YOUR INFORMATION

Under Data Protection Law you have the right to request information or request to delete information we store about you and/or your child without incurring costs. We are only obligated to provide information that is related to you and your child (depending on legal custody).

Any data access request is, however, 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. We cannot disclose confidential information related to the purpose of providing education, examinations or supplying examination scripts to external bodies. We cannot disclose confidential information on any of our staff.

Any request for data we store and process about you or your child must be completed in writing. The Subject Access Request form can be obtained from our Information Officer by email on hpope@thorntreeprep.co.za Data Protection Law allows us to respond to any such written requests within one calendar month. Excessive requests or simultaneous requests for the same information may incur an administration fee or be refused where Data Protection Law allows us to do so.

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.

An information update form will be sent out once in the middle of the school year for parents

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to make any changes to information stored on our admin system – StaffRoom. Details can also be changed at any time by contacting the Admissions Officer at hpope@thorntreeprep.co.za

11. CONSENT

Under Data Protection Law we are required to obtain consent to process an individual's personal data. This is with limitations and exceptions as we may have lawful and legitimate reasons to process such data to support the school's operation as an independent school or fulfill contractual or legal obligations, regardless of consent. When our school collects information about you, our school takes reasonable steps to advise you of certain matters.

This includes the purpose of the collection, and how to access, update and correct information held about you. For information about students and their families, a consent form is provided to parents upon enrolment. In some cases, we may send out separate consent requests using:

- paper-based consent forms;
- electronic consent forms;
- digital applications to obtain consent

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Dear parents

POPI Compliance

Owing to the recent passing of the POPI (Protection of Personal Information) Act, we as a school are obliged to become POPI compliant. We need to know that you give us permission to send glimpses of our pupils' world at Thorntree Preparatory School through our website, Facebook, the school prospectus, and the local or national newspapers. Any photographs published on behalf of the school will be used purely for marketing purposes.

Please would you indicate below your willingness for us to proceed with the above by writing "Yes" or "No" in the boxes and signing the bottom of the page. Please return this form to the admissions secretary, Mrs Mariam Ravat at admin@thorntreeprep.co.za or hand it in at the front office.

I agree to allow the school to photograph my child while at school, or involved in school functions, and to use these photographs and/or other personal information on the School's communication avenues, social media and the Unicorn annual magazine.

I agree to allow the school to publish photographs and/or personal information of my child at school on the school's prospectus packs, brochures, posters, banners, and in national and local newspapers, etc.

I agree to allow staff to write a testimonial on my child's behalf, if required by another school, and to supply any relevant personal information pertaining to this testimonial to a third party.

In the event that my child might leave Unicorn Preparatory, I give consent to allow the school to forward transfer documents, information (including relevant financial information) and records to the new school that my child will be attending.

Child's name and surname: _____ Grade: _____ Class:

Signed: _____ Name:

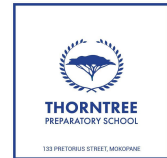
Parent/ Guardian

Should you at any stage change your decision on any of the above, it will be your responsibility to inform Thorntree Preparatory School in writing.

Date: _____

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THORNTREE PREPARATORY SCHOOL
PROTECTION POLICY



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