

POPIA : Addendum A
Data Subject - Rights

Dear Applicant (Data Subject)

This letter serves to inform you of your rights and responsibilities as a Data Subject under:

- The Protection of Personal Information,
- The General Data Protection Regulations, and
- The Promotion of Access to Information Act.
- You have:
- The right to be notified that **Personal Information ("PI")** and/or **Special Personal Information ("SPI")** is being collected about yourself, as the Competent Person, and your child/children.
- The right to be notified when your Personal Information has been accessed or acquired by an unauthorized person or was lost.
- The right to establish the identity of the Information Officer and what controls are implemented to safeguard your PI.
- The right to request access to your PI and/or SPI.
- The right to request the correction, destruction, or deletion of your PI.
- The right to object on reasonable grounds to the processing and retention of your PI.
- The right to not have your PI processed for the purpose of direct marketing.
- The right to submit a complaint to the Information Regulator regarding the interference with or loss of your personal data.
- The right to institute civil proceedings regarding interference or loss of your PI.

Your responsibility as a Data Subject is to keep the Information Officer updated with any changes to your information. In addition, we will send out annual update forms for you to complete and return.

Addendum B
Access to personal information

POPI – Data Subject- Requesting Permission for Personal Information Dear Parent (Data Subject)

This letter serves to obtain permission from you, the Data Subject and/or Competent Person in terms of the collection of information on yourself and your child in terms of:

The Protection of Personal Information,
 The General Data Protection Regulations,

1. **For consumers of our services, i.e., parents and guardians of children:**
 - a. Perform duties in terms of our Admissions Contract.
 - b. Operate and manage Data Subject/Competent Person's fee accounts, any applications, agreements and/or correspondence between them and **SMILEY KIDS EDENVALE**
 - c. Communicate, receive direct marketing, by email, SMS, letter, telephone, face-to-face, or in any other form.
 - d. Carry out market research and business analysis.
 - e. Debt recovery.
 - f. Updating all information held as referred to in Addendum A
 - g. Comply with our statutory, regulatory, legal and other obligations under various Acts.
 - h. Perform any administrative and operational functions as reasonably required .
 - i. To understand each child's family dynamic in order to support them their parents in times of need.
2. **For potential consumers/ parents and guardians of children:**
 - a. Verify information.
 - b. Check credit rating.
 - c. Direct marketing.
 - d. Any other reasonable purpose as reasonably required by **SMILEY KIDS EDENVALE** core business.
3. **For children:**
 - a. To make, or assist in making, decisions about their care and education.
 - b. To form a view of each child as an individual and to identify and/or improve the service that is being provided according to their needs.
 - c. To identify areas of vulnerability in their health, immunity, mental and/or

1. **Collection of Personal Information**
 We collect PI directly from Data Subjects when they provide us with personal details, i.e. the Application for Enrolment.
2. Where possible we will inform our Data Subjects when information is optional.
3. **Collection of Non-Personal Information**
 When somebody visits our website collection of non-personal information takes place. This enables us to establish which pages are of most interest to our parents and gives us very useful metadata that we use to enhance visitor's experiences to our website. Nobody can be identified from this information. This includes the use of cookies.

Categories of Data Subjects and Personal Information and Special Personal Information

Category: Consumers and Potential, i.e., Parents and Guardians of Children	
Personal Information	Special Personal Information
<ul style="list-style-type: none"> • Billing information • Email address • Emergency contact (if parent not available) • Full Names • Home and postal address • Marital status. If divorced, the custody and visiting arrangements • Telephone numbers 	<ul style="list-style-type: none"> • Credit score and references • ID number • Medical aid number and main member details • Passport number if no SA ID
Category: Children	
Personal Information	Special Personal Information

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physical wellbeing.

- d. To monitor and evaluate a child's progress through a curriculum framework.
 - e. To be able to report their progress to parents and guardians from a knowledge base.
4. For vendors, suppliers, extra-curricular providers and other businesses:
- a. Verifying information and performing checks.
 - b. Purposes relating to the agreement or business relationship between the parties.
 - c. Bank account details for the electronic payment of invoices.
 - d. For account reconciliations.
 - e. Complying with our regulatory and other obligations.
 - f. Any other reasonably required purpose relating to core services
8. Adhering to governance and regulatory norms and standards.
9. Immediately reacting to and investigating security incidents.
10. Physical security, i.e.:
- a. Access controlled gate
 - b. Alarm System
 - c. Security Patrols
11. Secure communications via Whatsapp Broadcasts, phone calls, email and face to face meetings.

Access to Personal Information

- 1. Parents and staff have the right to request a copy of the Personal Information we hold on them personally and their children.
 - a. Please contact the Information Operator in the office and specify which information you want.
 - b. All reasonable steps will be taken to confirm the identity of the person requesting the information.
- 2. At all times we are acutely aware of children's rights to privacy and protection.
- 3. Data Subjects PI is used extensively by authorized staff only in our daily management.
- 4. Teaching practitioners have access to the child's milestones and previous assessments.
- 5. If permission is granted, contact details of extra-mural service providers will be shared with the parents. The parents will elect to share their contact details with the extra-mural providers, nor not.

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| <ul style="list-style-type: none"> • Admission and Discharge Dates • Age • Allergies¹ • Attendance Register • COVID-19 Temperature Screening Register and other information • Full name • Date of Birth • Medications (currently being administered) • Transportation required | <ul style="list-style-type: none"> • Adoption history (if any) • Birth history • Child's medical history • Form 22 – Reporting Suspicions of Child Abuse • ID number • Immunization Records • Assessment Reports |
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Security of Personal Information (Data Protection)

- 4. **SMILEY KIDS EDENVALE** is legally obliged to provide protection for the Personal Information we hold, prevent unauthorized access and use of the Personal Information(PI) and by all means prevent loss of the information. In order to achieve this:
- 5. Use of PI has been documented in this policy and implemented in **SMILEY KIDS EDENVALE**. It effectively monitors access and usage of the information.
- 6. Access to PI has been documented in this policy and implemented at **SMILEY KIDS EDENVALE**
- 7. Our computers and networks are securely protected through Avast virus protection software, which prevents hacking, spyware and malware.
- 8. Allergy information is shared with the employees in order to keep the child safe from harm by preventing them from coming into contact with the allergen.
- 9. In the event that Form 22 (Allegations of Child Abuse) is used, the names and details will only be shared on a strict need-to-know basis as prescribed on the instructions on the form.
- 10. Monitoring and evaluation in terms of:
 - a. Children's reports and assessments (only shared with the child's parents/guardians).
 - b. Staff Performance Evaluations (only shared with the relevant management personnel and the member of staff him/herself).
- 11. In connection with legal proceedings, regulatory requirements, or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.
- 12. To assist with our business development, performance, customer satisfaction and efficiency.
- 13. To monitor our website usage.
- 14. To keep parents/guardians informed of events at our center.
- 15. To perform our contractual obligations entered between **SMILEY KIDS EDENVALE** and staff and/or the parents/guardians of the enrolled children.
- 16. Where necessary to verify identities for security purposes.
- 17. To contact parents/guardians regarding their children.
- 18. To respond to queries and requests from the parents.
- 19. To notify parents about any changes to the service.

¹ Allergies are listed as PI and not SPI for the purpose of possibly saving the child's life, several people in the organization need to know which child has an allergy and to what.

Data subject Initial (Applicant).....

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