

Privacy Policy

for

Open Learning Group (OLG)

OLG is accountable for the processing of personal information of a data subject in a safe and responsible manner.

Protecting your information is as important to us as it is to you.

This Privacy Policy informs you that OLG collects personal information and explains why and how we collect, use and store your personal information.

The processing of personal data is in conformity with the Protection of Personal Information Act 4 of 2013 (“POPIA”).

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1. Purpose and Objectives

- i. When data subjects have day-to-day dealings with OLG, some personal information may be obtained.
- ii. 'Personal information' is defined in POPIA. It refers to any information that can be used to identify a data subject. A data subject is any person, living or juristic, to whom the personal information relates and that engages with OLG.
- iii. POPIA is aimed at protecting data subjects' personal information and prescribes what OLG may and may not do with it.
- iv. As OLG is accountable for living up to the principles set out in POPIA, it has in place privacy compliance measures which it uses to monitor and enforce its compliance with these principles.
- v. When complying with POPIA, OLG will ensure that it acts with integrity and fairness and will always balance the rights of both, data subjects and OLG's, in an objective manner.
- vi. This Policy must be read with the Promotion of Access to Information (PAI) Manual which is also on the website.

2. Details and Contact Information of OLG

- i. OLG, a subsidiary of Kagiso Capital (RF) Pty Ltd, is an education and training provider that offers a wide range of accredited and non-accredited courses. OLG is registered with the Department of Higher Education and Training as a private higher education institution under the Higher Education Act, 1997. Its focus is on providing accessible and flexible learning solutions, including distance learning, online courses, and workplace training. OLG provides education, skills development opportunities and comprehensive student support services to a diverse range of learners, including individuals and corporate clients.
- ii. Its head office is at 87 Central Street, Houghton Estate, Johannesburg, 2198, South Africa.
- iii. To understand OLG's products and services visit its website: <https://olg.co.za/>.
- iv. The Information Officer Dr Hennie Scheepers may be reached at the following email address: info@olg.co.za.

3. Application

- i. This Privacy Policy may, in relation to OLG apply under several different circumstances. These include but are not limited to :
 - When using any of its products or services
 - When using our OLG4Me student portal platform

- When applying to be a student or for a bursary
 - When submitting assignments and exam information
 - When applying for work experience or for employment
 - When supplying services and/or providing any personal information to fulfil the service contract
 - When we need to comply with legislation
 - When we provide loans or invest in your organisation
 - and/or when any information is collected from or shared with any third parties.
- ii. This Privacy Policy applies to OLG’s website, applications, online services, social media platforms as well as any publications or newsletters that OLG may publish.
- iii. When you share your information with OLG, subject to your marketing and/or communication preferences selected on the application form or as otherwise indicated by you, you may also be sharing it with one of our subsidiaries or partners. Some personal information may also be shared with operators/contractors in order to deliver the OLG’s services and products. If this is the case, they are bound by and adhere to this policy as well.

4. The Information OLG Collects

- i. OLG collects information that is directly and voluntarily provided to it.
- ii. OLG will collect personal information from the data subject when :
- Any person engages or supplies OLG with or uses their services,
 - A data subject communicates with OLG via forms, email or uses any other channel, not specifically mentioned here,
 - Any person uses the online self-serve platform, including the OLG4Me student portal platform
 - A person subscribes to newsletters or responds to advertisements, competitions or requests for information.
- iii. The information that data subjects provide may include current and historical personal information including names, contact details, title, identification, employment, positions held, enquiry/complaint details and information about the organisation to which the data subject is affiliated.
- iv. Information may also be sourced from employers, regulatory authorities, recruitment agencies, credit ratings agencies, information or service providers, public records and other third parties.
- v. OLG may also collect personal information through other dealings, including through any contact made in person, by telephone, email or online.

5. Information Collected from Other Sources

- i. OLG may also collect information about data subjects from public sources including social media platforms.
- ii. OLG advises data subjects to familiarise themselves with the respective privacy policies that apply to these platforms.
- iii. OLG will process any information from these sources in accordance with the law.

6. Children's Personal Information

- i. OLG does not collect children's personal information without the consent of their parents or guardians. If a data subject is under the age of 18, the data subject should not provide any personal information to OLG without the written consent of their parent or guardian.
- ii. OLG reserves the right to ask for proof of consent or proof of age if it suspects that it is engaging with a child under the age of 18 years.

7. What OLG uses the Personal Information for

- i. OLG uses personal information to :
 - provide products and services
 - to understand your specific needs and requirements, and in order to improve the benefits, services and value offering
 - to provide you with related marketing material due to your past interaction and use of the OLG services
 - respond to enquiries
 - send invitations to OLG events
 - provide you with communications in relation to the services being rendered and send updates and newsletters to keep you informed on the latest developments within OLG and within the industry it operates in
 - enable seamless payment to our suppliers for services procured
 - ensure health and safety and
 - to use for statistical, historical and/or reporting purposes.
- ii. OLG will not further process personal information without first assessing whether:
 - The further processing is compatible with the reasons the data subject initially provided the information; or

- The data subject has consented to further processing of personal information; or
 - The further processing is in accordance with this notice; or
 - If it is in accordance with the law.
- iii. OLG will not contact a data subject for unsolicited marketing purposes either telephonically, by mail, SMS or email if the data subject has not opted to receive these communications. It may however contact data subjects who have consented to be on its mailing lists. Data subjects who wish to no longer receive communication have the option to opt out by emailing info@olg.co.za.

8. Information Provided due to a Vacancy

- i. When a data subject responds to an application for a vacancy, either as an employee or volunteer, a curriculum vitae (“CV”) which contains personal and special personal information is usually provided to the OLG .
- ii. OLG may request further personal and special personal information about education, employment, race and state of health. As part of the application, the data subject must provide their consent to use of the information to fulfil any recruitment testing assessments and activities which may be required from employers under applicable laws.
- iii. These will include the option to carry out various screening checks and to consider the data subject for other positions. In order to conduct the screening checks OLG may share aspects of the personal information with inter alia: academic institutions, credit bureaus, medical providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers.
- iv. OLG may also gather additional information from publicly available resources such as LinkedIn, Facebook or other social or professional media platforms and collate this with the information that the applicant data subject provided to the OLG . Where consent is not explicitly provided, OLG reserves the right not to progress the application.
- v. OLG will keep the personal information for as long as it is necessary during the recruitment process.
- vi. If the applicant is successful, OLG will retain the personal information in accordance with South African legislation.
- vii. If the applicant is unsuccessful or withdraws the application, OLG will dispose of information safely and securely.
- viii. The process also applies where bursaries and student loans are offered.

9. Legal or Contractual Obligations to Collect Information

- i. This policy is governed by the laws of the Republic of South Africa. Specifically, OLG undertakes to comply with the provisions of POPIA and the Promotion of Access to Information Act No.2 of 2000 (“PAIA”).
- ii. In so far as OLG collects and uses personal information relating to European citizens (who may be inter alia students, employees, service providers), OLG undertakes to uphold and comply with the data protection obligations in terms of the General Data Protection Regulation (GDPR) (EU) 2016/679 so far as it applies to OLG and in a proportionally manner based on the type and amount of information held.
- iii. OLG may also be legally or contractually obliged to collect information from data subjects to conduct business, for example, where OLG is required by law to gather personal information for labour, health, tax, B-BBEE, FICA, SAQA, SETA and NQF requirements.
- iv. Suppliers may be required to provide personal information for overall legal compliance including processing of payments/ accounts, identity checks, reference checks, assessment of financial records, bank account numbers, taxpayer compliance status and contact details verification.
- v. Where relevant, OLG may advise of the details that OLG are required to collect.
- vi. Data subjects may also request the reason for such collection of information.

10. CCTV cameras

- i. The OLG 's offices may be monitored by CCTV cameras for safety and the prevention of crime. The footage is stored in a secure location by a third-party service provider.

11. Sharing of Information

- i. OLG will not use or share personal information with any person outside of OLG unless it is for a business purpose.
- ii. OLG will not sell, rent nor provide your personal information to unauthorised entities or to third parties for their independent use without your consent.
- iii. To deliver products and services and for the efficient running of business, OLG uses third-party service providers/operators. At times, OLG will share data subjects' personal information with these third-party service providers / operators. For this reason, OLG signs and reviews confidentiality/operator agreements and ensures that they operate under strict requirements

aimed at keeping personal information secure and confidential and that the said information is used for the purpose for which it is provided.

- iv. OLG will release your personal information to a party if it believes that it is required by law or by a court or statutory body to do so. OLG may also share personal information with banking institutions and credit providers, and governmental, judicial, regulatory and law enforcement bodies and agencies, if required.
- v. OLG will also disclose your personal information if it believes that it is necessary to prevent or lessen any unlawful or harmful actions and to protect and defend legitimate business interests, rights or property of the OLG .

12. Trans Border Information Flows

- i. Personal information may be stored on servers located outside of South Africa. OLG however undertakes to ensure that the security of personal information is maintained and that POPIA is fully complied with, in so far as it is applicable. Where the service provider or operator is outside of South Africa, we ensure that they are bound by similar legislation or binding agreements.

13. Photographs and videos

- i. There may also be photos for example of students and events held that is published on OLG websites, publications, social media and other marketing material. By attending any events hosted or sponsored by OLG you automatically permit the use of any photographs, or video footage in which you may appear, and at no charge.
- ii. Should you elect not to have a photo that recognizes you specifically to be used, you may at any time request a revocation, by writing to the information officer.
- iii. Where such request of revocation is granted, it will not affect any actions taken by OLG before the decision is taken regarding such revocation.

14. Retention of Records

- i. OLG will not retain data subjects' personal information for longer than is necessary unless consent has been received or it is required by law or it is for the purposes of a contract. Personal information that is no longer required is securely disposed of or is deidentified as soon as reasonably practicable after it is no longer authorised to be retained.

15. Security

- i. OLG has taken every reasonable and affordable measure, to keep personal information in a secure, reliable and protected place, free from unauthorised access.
- ii. OLG regularly monitors its information technology systems for possible vulnerabilities and cyber-attacks. To this end, OLG deploys reasonable security safeguards.
- iii. Although OLG has measures in place to minimise security threats, OLG cannot guarantee data breaches will not happen and therefore also encourages data subjects to have their own security measures in place.
- iv. In the unlikely event of personal information being compromised, and where applicable, OLG will follow the guidelines and processes provided by POPIA.

16. Data Subjects Rights

- i. Data subjects may, via the website and through an email link elect to be added to various mailing lists for communication on OLG products and services available.
- ii. Data subjects may, also at any time and at no cost, elect to update their preferences or stop receiving the communication by emailing **info@olg.co.za**.
- iii. Data subjects also have the right to know what personal information OLG have about the said data subject, to correct it, request its deletion and to determine if OLG has shared the personal information with third parties.
- iv. Data subjects may also object to the processing of their personal information. Any of these requests must be in writing on the prescribed form. It may take up to 5 working days to respond to a request and a small fee may be charged.
- v. If a data subject or member requires a deletion of their personal information, OLG may need to terminate all agreements with that data subject as OLG cannot maintain relationships without having some personal information.
- vi. OLG also retains the right to refuse to delete some personal information if the information is required to be kept in terms of the membership contract, by law or if OLG is required it to protect its rights.

17. Requests for Information and Objections

- i. Should a data subject require more information on the OLG 's Privacy Policy, or needs to submit a request, please contact the OLG 's Information Officer, as per details above. You

may also be provided with the required form and the fee amount if due. The Forms may also be found at <https://info regulator.org.za/popia-forms/>.

- ii. While OLG makes every effort to assist data subjects, should you have any further queries or be unhappy, you may also contact the Information Regulator whose contact details may be found at <https://info regulator.org.za/> and who is mandated to oversee that personal information is managed in a responsible manner.

18. Amendments to the Policy

- i. From time to time, OLG may amend this policy to accommodate changes in its business and/or legislative amendments.
- ii. The most current version of this Policy will be displayed on its website.
- iii. If you use the website or any of the services or products of OLG after OLG has displayed a change to this Policy, you will be deemed to have read and understood the change.

OLG is committed to protecting personal information and adhering to POPIA.