



EDGE Education (Pty) Ltd - Privacy Policy

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1. Introduction

Welcome to our privacy policy. We are EDGE Education (Pty) Ltd (2015/332511/07) and we are committed to protecting and respecting your privacy in accordance with the relevant and applicable Data Protection legislation and regulations within our various jurisdictions, as amended from time to time. This Privacy Policy outlines how we collect, store, use, disclose and protect your personal information when you visit our website (www.edgeeducation.com) or use our services. By using our services or accessing our website, you hereby consent to the practices and are deemed to have read, understood, accepted, and agreed to be bound by all of its terms described hereunder.

2. Personal information

Personal Information is defined as any information that can identify an individual, including but not limited to names, identification numbers, contact details, demographic information, and any other information that relates to an identifiable person.

Processing is defined as any operation or activity involving personal information, including collection, use, storage and disclosure.

Personal information includes:

- certain information that we collect automatically when you visit our website or application;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

2.1 **Common examples**

Common examples of the types of personal information which we may collect and process include your:

- identifying information – such as your name, date of birth, or identification number of any kind;
- contact information – such as your phone number or email address;
- address information – such as your physical or postal address; or
- demographic information – such as your gender or marital status.

2.2 **Sensitive personal information**

Depending on the goods or services that you require, we may also collect sensitive personal information including your:

- financial information – such as your bank account details;
- sensitive demographic information – such as your race or ethnicity;
- medical information – such as information about your physical or mental health;
- criminal information – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- employment information – including your membership of a trade union; and
- beliefs – including your political or religious beliefs.

3. Changes

We reserve the right to update this Privacy Policy from time to time. Any changes will be posted on our website with the updated effective date and version. We encourage you to review this policy periodically to stay informed with our measures to ensure the protection of your personal information.

4. Processing

We process personal information in various ways, including but limited to:

- To provide, manage, and improve our services.
- To promote effective communication with you, including but not limited to, our timeous response to inquiries, send updates, etc.
- To process transactions and manage accounts.
- To comply with legal and regulatory requirements.
- To send promotional materials with your explicit consent.
- To analyse data for the improvement of our services.

5. Collection

We collect personal information in various ways, including but not limited to:

5.1 **During our Contractual Process**

During the process of entering into a contract with us, we may collect additional personal information necessary to facilitate and fulfil the contract. This information may include, but is not limited to, your payment details, business contact information, and any specific contractual preferences or requirements. We will use this information solely for the purposes of preparing, executing, and managing the contract, as well as for any related legal or regulatory obligations. We ensure that all such data is handled in accordance with applicable data protection laws and will not be used for any other purposes without your explicit consent.

5.2 **On registration and download**

Once you register and download our application, you will no longer be anonymous to us as you will provide us with certain personal information which include your username and password.

This personal information will include:

- your name and surname;
- your email address;
- your telephone number;
- your postal address or street address;
- your transactional data (e.g. purchase history, payment details, etc);
- your technical data (e.g. IP address, browser type, etc); and
- your username and password.

We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

5.3 **Collection on order**

When you order any goods or services from us, you will be asked to provide us with additional information on a voluntary basis (goods information or services information).

5.4 **Collection from browser**

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

5.5 **Cookies**

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs;
- allowing third parties to provide services to our website; and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you

from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at www.allaboutcookies.org.

5.6 **Third party cookies**

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

5.7 **Web beacons**

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

5.8 **Optional details**

You may also provide additional information to us on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website and application or when you respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website and application.

5.9 **Recording calls**

In instances where we call you via telephone or via a virtual conference, we may monitor and record such conversations. We will notify you of such recording wherein you will be entitled to object to such recording.

6. Purpose for collection

We may use or process any goods information, services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- services purposes – such as providing our services;
- marketing purposes – such as pursuing lawful related marketing activities;
- business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- legal purposes – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website or the application;
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and other activities in connection with your usage of the website and the application

Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.
- if we transfer your personal information outside of South Africa.

7. Use

7.1 **Our obligations**

We may use your personal information to fulfil our obligations to you. We will not use your personal information for any purposes other than those explicitly stated in this policy unless we have obtained your explicit consent to do so. If we need to process your personal information for a new purpose that is not compatible with the original purpose, we will inform you and obtain your consent before proceeding.

7.2 **Messages and updates**

We may send administrative messages and email updates to you about the website and the application. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

7.3 **Targeted content**

While using the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers

with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your personal information.

7.4 We will process your personal information based on one or more of the following legal bases:

- Consent: When you have given us clear consent for the processing of your personal information for a specific purpose.
- Contract: When the processing is necessary for the performance of a contract with you or to take steps at your request before entering into a contract.
- Legal Obligation: When the processing is necessary for compliance with a legal obligation to which we are subject to.
- Legitimate Interests: When the processing is necessary for our legitimate interests or those of a third party, provided that these interests are not overridden by your rights and interests.
- Vital Interests: When the processing is necessary to protect someone's life.
- Public Task: When the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

8. Disclosure

8.1 **Sharing**

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our goods suppliers or service providers under contract who help supply certain goods or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods suppliers or service providers only use your information in connection with the goods they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate.

We will not share your personal information with third-party advertisers without obtaining your explicit consent. You will be asked to provide consent before any such sharing occurs. The consent request will clearly outline the specific types of information that may be shared and the purposes for which it will be used.

- You have the right to opt out of having your personal information shared with advertisers at any time. This can be done by [following the opt-out instructions provided in communications from us] or by contacting [our designated privacy team] directly.
- Upon receiving your opt-out request, we will promptly cease sharing your personal information with advertisers and update our records accordingly.
- If there are any changes to the types of information shared or the purposes of sharing, we will notify you and seek renewed consent where necessary.
- You can review and update your consent preferences at any time by contacting [our privacy team].
- For any questions, concerns, or to exercise your opt-out rights, please contact our privacy team at legal.services@edgeeducation.com.

8.2 **Regulators**

We may disclose your personal information as required by law or governmental audit.

8.3 **Law enforcement**

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

8.4 **No selling**

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

8.5 **Marketing purposes**

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

8.6 **Employees**

We may need to disclose personal information to our employees that require the personal information to carry out their work functions. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

8.7 **Change of ownership**

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

8.8. **Notification to Affected Individuals**

In the event of a data breach where personal information has been accessed or acquired by an unauthorised person:

- We will notify affected individuals as soon as reasonably possible after discovering the breach.
- Notifications to affected individuals will be made via email, SMS, or any other direct communication method available.
- The notification will include sufficient information to allow affected individuals to take protective measures against potential consequences of the breach. This will include:
 - A description of the nature of the data breach.
 - The categories of personal information affected.
 - The measures we have taken or plan to take to address the breach.
 - Recommendations for steps that affected individuals can take to mitigate potential harm.
 - Contact details for further information and assistance.
 - Coordination with the Information Regulator: Notifications will be coordinated with the Information Regulator to ensure that they meet legal requirements and provide consistent information.

9. Security

The safety and security of your personal information is of paramount importance to us and we strive to ensure that we always do our best to comply with applicable data protection laws. As such, we undertake to implement appropriate technical and organisational measures to safeguard your personal information against unauthorised access, loss, destruction or alteration. Notwithstanding the aforementioned, despite our efforts, no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security but will ensure that reasonable measures are taken to protect and safeguard your personal information. Our website is hosted in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

10. Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website. You are able to review or update any personal information that we hold on you by accessing your account, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity and legal capacity before granting you access to your account or making any corrections to your personal information.

11. Retention

We will only retain your personal information (in a format at our discretion) for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.
- the retention is necessary for your future use and enjoyment of our website and application

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Upon the expiry of the retention period, we will securely delete or anonymize your personal information.

12. Erasure of Personal Information

As an individual, you have the right to request the deletion of your personal data under certain circumstances, in line with the relevant and applicable Data Protection legislation and regulations within our various jurisdictions, as amended from time to time. This is known as the "Right to Be Forgotten."

12.1 **How to Submit a Request for Erasure**

If you wish to request the deletion of your personal data, you can do so through the following channels:

- Email: Send a written request to [legal.services@edgeeducation.com].

- Online Form: Complete the data erasure request form available at [<https://edgeeducation.com/contact-us/>].

Please include sufficient details for us to identify you and your data, such as your full name, contact information, and any relevant account numbers or references.

12.2 **Verification and Identity**

To protect your privacy and prevent unauthorised data deletion, we may request additional information to verify your identity. This step is necessary to ensure that your personal data is not erased by mistake or through fraud. Acceptable forms of identity verification may include your government-issued ID or valid passport.

12.3 **Grounds for Erasure**

You may request the deletion of your personal data if one of the following conditions applies:

- The data is no longer necessary for the purpose for which it was collected or processed.
- You withdraw your consent (where processing was based on consent) and there is no other legal basis for processing.
- You object to the processing of your data, and there are no overriding legitimate grounds for continuing the processing.
- The data has been unlawfully processed.
- The data must be erased to comply with a legal obligation.

12.4 **Exemptions and Limitations**

Please note that in some situations, we may not be able to fulfil your request for erasure if:

- The data is necessary for exercising the right of freedom of expression and information.
- The data must be retained to comply with a legal obligation.
- The data is required for reasons of public interest in the area of public health.
- The data is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes.
- The data is necessary for the establishment, exercise, or defence of legal claims.

If we cannot fulfil your request for any of these reasons, we will notify you and explain the grounds for our refusal.

12.5 **Processing of Erasure Request**

Once your request has been received and verified, we will assess whether your request meets the legal requirements for erasure. If your request is approved:

- We will delete your personal data from our active databases.
- If your data has been shared with third parties, we will inform them of your erasure request, unless this proves impossible or involves disproportionate effort.

You will receive a confirmation once your data has been erased. We will endeavour to respond to your request within one month. If your request is complex or involves numerous records, we may extend the response time by an additional two months, but we will notify you of the extension within the first month.

12.6 **Record of Requests**

We are required to keep a log of all erasure requests, including your name, the date of the request, and our response. This record is maintained to demonstrate compliance with relevant and applicable Data Protection legislation and regulations but does not include any of your deleted data.

13. Data Portability

The right to data portability allows individuals to request the transfer of your personal information to another service provider or receive a copy of your data in a structured, commonly used, and machine-readable format.

13.1 **How to Submit a Data Portability Request**

You may submit a data portability request if your data has been processed based on your consent or for the performance of a contract. To request your data, you can contact us through the following means:

- Email: Send a written request to [legal.services@edgeeducation.com].
- Online Form: Complete the data erasure request form available at [<https://edgeeducation.com/contact-us/>].

Please include sufficient details for us to identify you and your data, such as your full name, contact information, and any relevant account numbers or references.

13.2 **Verification of Identity**

To protect your data, we will require you to verify your identity before processing your request. You may be asked to provide a government-issued ID or other documentation, such as a valid passport, to confirm your identity. We will notify you of the verification process after your request is submitted.

13.3 **Scope of Data Portability**

Data portability requests apply to:

- Personal information you have provided to us.
- Data processed based on your consent or for the performance of a contract.
- Data that is processed by automated means (i.e., not manually).

This data will be provided in a structured, commonly used, and machine-readable format.

13.4 **Transfer to a Third Party**

You can request that we transfer your data directly to another service provider if it is technically feasible. If you opt for this, please provide the necessary details of the service provider to whom you wish your data to be transferred.

13.5 **Exemptions and Limitations**

Please note that data portability only applies to data processed based on your consent or contractual necessity and processed by automated means. The following types of data are not subject to portability:

- Data that we process for compliance with legal obligations.
- Data processed for reasons of public interest or in the exercise of official authority.
- Data that is not in a structured, machine-readable format.

If your request is denied, we will provide a clear explanation of the reasons, including the relevant legal grounds.

13.6 **Timeframe for Response**

We will respond to your data portability request within reasonable time of receiving it. In cases where the request is complex, we may extend the response time, and we will notify you of this extension and provide the reasons.

13.7 **Format of Data/Information**

The data you receive will be provided in a commonly used, structured, and machine-readable format. We will ensure that the data is provided in a format that enables easy transfer to another service provider or for your personal use.

13.8 **Cost & Third-Party Transfers**

In most cases, there will be no charge for processing a data portability request. However, if your request is manifestly unfounded, excessive, or repetitive, we may charge a reasonable fee to cover the administrative costs or refuse to comply with the request.

14. Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected where laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

The selection of third-party service providers and partners is subject to a rigorous privacy due diligence process. This ensures that they comply with data protection standards and that they are capable of providing the necessary safeguards to protect your personal information. Our diligence process includes evaluating their data protection policies, security measures, and the legal framework within their operating jurisdiction.

15. Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We will take steps to remove that information from Our servers. If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require parental consent before We collect and use that information.

16. Enquiries

If You have any questions or concerns arising from this privacy policy or the way in which We handle personal information, please contact Us.