



# **PRIVACY POLICY**

**STEPPING STONES MONTESSORI SCHOOL T/A  
THE CAPE TOWN MONTESSORI SCHOOL TRUST**

Your privacy is important to us. It is Stepping Stones Montessori School's policy to respect your privacy regarding any information we may collect from you across our organisation, including our website, <http://www.steppingstones.org.za>, and other platforms we use within our organisation.

We only ask for personal information when we truly need it to provide a service to you. We collect it by fair and lawful means, with your knowledge and consent. We also let you know why we're collecting it and how it will be used.

We only retain collected information for as long as necessary to provide you with your requested service. What data we store, we'll protect within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification.

We don't share any personally identifying information publicly. We do share personal information with third parties that require it for the purposes of doing their work, which is related to what we are doing for you. For example, the school principal, teachers, occupational therapists, extra mural providers, HR and IT consultants and any other child care professionals. We also share your personal information when required by law. For example with Western Cape Education Department.

We are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and practices of these sites, and cannot accept responsibility or liability for their respective privacy policies, however, aim to ensure that they are aligned with the POPI Act.

You are free to refuse our request for your personal information, with the understanding that we may be unable to provide you with some of your desired services.

Your continued use of our services as an organisation and website will be regarded as acceptance of our practices around privacy and personal information. If you have any questions about how we handle user data and personal information, feel free to contact us.

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

## **1. The information we collect**

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements, and delivering services accordingly in relation to your child/ren and in accordance with the DBE (Department of Education), the WCED (Western Cape Education Department) and DSD (Department of Social Development). For this purpose we will collect personal information such as names, ID numbers, contact details,

physical addresses and all other personal information as stipulated within the various categories in point 7 below.

We collect information directly from you where you provide us with your personal details via our website and/or other internal forms as required. Where possible, we will inform you what information you are required to provide to us with and what information is optional.

Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information. This is set out in our Cookies Policy, found on our website.

## **2. How we use your information**

We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or standard procedure purposes outlined to us by the DBE, WCED or DSD.

For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user on our school platforms/database;
- For audit and record keeping purposes;
- In connection with legal proceedings.

## **3. Disclosure of information**

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

## **4. Information Security**

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;

- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

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

## **5. Your Rights: Access to information**

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided on our website and specify what information you require. Please note that in accordance with our PAIA Manual (a copy of which can be provided on request) we may require you to complete a request form and submit with supporting documentation such as a copy of your ID document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee as advised in our PAIA Manual. Any such information gathered from this process will not be saved and will be deleted as soon as verification of identity has been achieved.

## **6. Correction of your information**

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

## **7. Definition of personal information**

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. Further to the POPI Act, Stepping Stones Montessori School also regards the following items as personal information:

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education, medical, financial, criminal or employment history of the person;

- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

## **8. How to contact us**

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website.

This policy is effective 1 July 2021.

*This policy must be read in conjunction with the POPI Act which can be downloaded from [Act No. 4 of 2013 : Protection of Personal Information Act, 2013](#)*