



impaq

— Innovative Education —



IMPAQ PRIVACY STATEMENT

Who we are

We are Futurelearn Operations (Pty) Ltd, trading as “Impaq”. We form part of the FutureLearn group, which in turn is part of the PSG Group through PSG Alpha. We provide school, home education and distance learning curriculum and related products and services.

The structure of the PSG Group and Impaq’s position within PSG Alpha is available on the FutureLearn website, at www.futurelearn.co.za.

Our commitment to privacy

We value and respect your right to privacy and the trust you place in us by giving us your (and/or your learner’s) personal information. We strive to adhere to the provisions of the Protection of Personal Information (POPI) Act at all times.

The purpose of this statement is to explain who we are, what personal information we collect, how we use and protect such information, with whom we share such information and what your rights are with regard to the personal information you have provided to us.

In this Privacy Statement, “personal information” means information or pieces of information that could identify you (and/or your learner). This includes information such as your name, contact details, address, photographs, etc.

Should you have any concerns as to the manner in which your personal information is being used, we will assist you in efficiently resolving such concerns.

How do we collect your information?

Due to the nature of our business, we collect and use personal information about our learners, their parents/legal guardians, account holders and academic service providers – tutor centres and schools – henceforth referred to as “centres”.

In most cases we explicitly request your consent to use such information, however, in some cases we may infer consent from your actions and/or behaviour. Should a learner be under 18 years old, we will request the consent of the learner’s parent/guardian before using the learner’s personal information.

The personal information that we use has been provided to us by the learner or the learner’s parent/legal guardian in one or more of the instances stated below:

- On registration forms for our products or curriculum;
- Correspondence via e-mail, fax, telephone and post;
- When visiting our website, mobile app or any on-line portal under our control (henceforth referred to as our “Platform”);
- At social events;
- Via centres;
- During visits to our offices;
- Via social media;
- Marketing of our services.

What personal information do we collect?

Our products and curriculum are aimed at learners under the age of 18, therefore, we collect and use the relevant information about learners whose details have been provided to us by their parent/legal guardian.

Under normal circumstances we do not correspond with persons under the age of 18, except on relevant academic matters. Due to the nature of our business we are not always able to ascertain the age of the person communicating with us. We accept any personal information provided by a learner on the basis that the parent/legal guardian consented to the provision of such personal information. If we discover that we have collected information without consent from a parent/guardian, we will delete said information as soon as possible.

We may collect and process the following information (which may include personal information) about you and/or your learner:

- Information that you provide by filling in forms on a Platform. This includes information provided at the time of your registering to use a Platform, subscribing to our products and/or services, posting material or requesting further services;
- Information that we may ask you for when you report a problem with our Platform or our products and/or services;
- Information that relates to records of correspondence between us;
- Information from surveys that you choose to complete for us that we use for research purposes;
- Details of transactions you carry out via our Platform; and
- Details of your visits to our Platform (including traffic data, location data, and weblog and other communication data, whether they be required for our own billing purposes or otherwise) and the resources that you access.

At Registration:

We collect the following personal information that you provide us, by filling in the registration form on a Platform or otherwise:

- Account holder's information: title, full names, surname, contact details including physical and postal address, identity number, copy of identity document and bank account details (if paying via debit order).
- Parent/legal guardian's information: title, full names, surname, contact details including e-mail address, physical and postal address, identity number.
- Learner's information: title, full names, surname, contact details including e-mail address, physical and postal address, identity number, copy of identity document or birth certificate (only Grade 12), race (we require the learner's race for statistical purposes), student number (if you were previously registered with us), historic report cards and subject choices.

Through correspondence via e-mail, fax, post and telephonically:

We collect personal information through enquiries made to our offices via e-mail, fax, post and telephonically.

When you visit our Platforms:

We may use Cookies to manage your sessions and to store preferences, tracking information, and language selection. Cookies may be used whether you register with us or not. Cookies are small text files transferred by a web server to your hard drive and thereafter stored on your computer. The types of information a Cookie collects include the date and time of your visits to a Platform, your browsing history on a Platform, your preferences, and your username.

You have the ability to accept or decline the use of Cookies on the device accessing our Platform. However, declining the use of Cookies may limit your access to certain features of our Platform.

In addition to cookies, we also use other tools (such as web analytics tools and pixel tags) to automatically collect information when visiting our Platform. The type of information we collect includes information about the type of browser you use, your IP address and the hyperlinks you have clicked on. We gather such information for

statistical and research purposes; this information does not identify an individual specifically and is not used to that end.

We use comments and testimonials posted on our Platform to improve our products and/or services.

You are requested to continuously update your personal and contact details and the learner's details to enable us to improve the delivery of our products and services to you.

At social events:

Should we take photos at social events, these photos may be uploaded by our marketing team to our Platform. By your participation in the social event you consent to your photo being taken and to the fact that these photos could be uploaded to our Platform. If you do not wish to have photos of you or a learner appear on our Platform, you must inform us in writing, in advance, at <http://www.impaq.co.za/talk-to-us/>.

Centres:

We may collect your and/or your learner's personal information from centres who are our active clients. This personal information is similar to the data that we collect directly from learners, their parents/legal guardians and/or account holders.

Visits to our offices:

Upon arrival at our offices, you are required to fill in your name, identity number and vehicle registration number in our visitor book, which is presented to you by security. You will then be issued a visitor's slip, which must be signed by the person you are visiting and must be returned to security upon departure.

Via social media:

We may gather your and/or your learner's personal information once you submit an enquiry or comment on our Platform, Twitter account or Facebook page, or when you submit an inbox message. This information is used to assist us in resolving your query or responding to your comment.

Marketing of our services:

We follow up with clients who were previously registered with us to gather information as to why they are no longer registered with us. This information is strictly used for statistical purposes and all clients have the option to opt out of this or refrain from answering any of our questions.

Third Party Websites

Our Platform may have links to other websites or you may be referred to our Platform through a link from another website. We have no control over the content or data collection practices of these third party websites. We encourage you to read their privacy policy terms and conditions before using such third party websites and disclosing personal information about you or anyone else, as we will not be held liable for personal information collected on these third party websites.

Certain centres have websites with links to/from a Platform. These centres are separate and distinct from us and are responsible for their own content management and collection of personal information.

Clients submit contact information on our Platform when logging a query or comment.

In some instances, our third-party service providers may use Cookies on the Portal. We cannot control or access Cookies used by third-party service providers. This privacy policy covers only Cookies used by us but not any

What do we do with your personal information?

We may use the information (including personal information) we hold about you and/or your learner in the following ways:

- To identify the learner to effect the registration process;
- To open your account with us;
- To provide you with our products and/or services for which you have registered or that we believe may be helpful;
- To keep record of information associated to the products and/or services for which you have registered (for example marks for tests, examinations or assignments);
- To respond to your queries, comments and complaints;
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- To ensure that content from our Platform is presented in the most effective manner for you and for the device you use to access a Platform;
- To provide you with information, products or services that you request from us or which we feel may interest you, when you have consented to be contacted for such purposes;
- To allow you to participate in interactive features of our products and/or services when you choose to do so;
- To carry out and enforce any contracts that may form between us;
- To notify you about changes to our products and/or services;
- To send promotional information and announcements;

With whom do we share your personal information?

To enable us to deliver our products and curriculum to you, your information is shared with our employees as well as third parties that assist us in delivering our products and services to you. We do not share information with the PSG Group.

Third parties that we share information with on a regular basis include:

- Centres that need to have a record of which learners are registered with us and, as such, are entitled to our products and/or services, as well as which learners are writing examinations in specific locations.
- Contractors who assist us with marking papers and processing the results.
- Warehousing, delivery or courier services that enable us to deliver our products and curriculum to you.
- Service providers who assist us in maintaining our IT infrastructure.
- Consultants and advisors including, but not limited to, legal advisors, business consultants, financial advisors and auditors specifically appointed by us to render services to the company in respect of its business.

Third parties that we share personal information with on an ad hoc basis:

In some instances we may need to share your personal information with a third party to comply with a legal requirement, for example:

- Law enforcement or government authorities – where there is a legal requirement to disclose the information;
- Examination board – personal information of learners are shared with the relevant examination board for those learners who enter the Further Education and Training Phase of the curriculum.

Should we share your personal information with a third party, such information is limited to the agreement between us and the third party. We use commercially reasonable efforts to ensure that your information is kept confidential and secure by such third parties.

We do not sell your personal information. However, should we enter into a sale or business agreement, merger, consolidation, a change in control of our business, reorganisation or liquidation of all or a portion of our business, you will receive notification thereof in the event that the purchaser will not be bound to the same terms and conditions that apply to us in respect of your and/or your learner's personal information.

Sending personal information outside of South Africa

We do not send your personal information to any country outside of South Africa.

How long do we keep your personal information?

The personal information that you provide will be retained, in a secure manner, for as long as is required to achieve the purpose for which it was collected. Without limiting the generality of the above:

- All financial information provided will be kept for the duration of your registration with us, and for a period of five years after completion of your curriculum or termination of registration;
- Assessment pieces will be kept for an additional five years after completion of the course or termination of registration;
- We keep registration forms for an additional three years after completion of the course for legal and administration purposes.

How do we keep your personal information confidential and secure?

We take all commercially reasonable measures to ensure the confidentiality and integrity of your personal information, and we require any third party that handles your personal information on our behalf to do the same. These measures include the following:

- We conduct regular risk assessments to ensure that we are aware of any physical and/or technological risks. We believe that our technical and organisational measures are appropriate to address these risks;
- We restrict access to your personal information to authorised employees and third parties.;
- We use encryption when transmitting confidential, personal information;
- We cannot guarantee the security of information that is sent to us. You are responsible for using secure methods when sending confidential information to us.

Impaq only collects personal information when you provide such information voluntarily. The collected personal information is stored in databases to which access is strictly controlled and is made available only to those who need to have access to such information in the course of their duties.

The personal information you submit when you register on our Platform may be protected by a unique customer password and user ID. You should not disclose your password information to anyone and always remember to log off after each session.

We have taken certain security precautions to safeguard your personal information. However, as with most electronic transactions, no method is impervious to attack. While we strive to use commercially acceptable means to protect the personal information you provide, we cannot guarantee its security. Therefore, you acknowledge and agree that we assume no liability regarding the theft, loss, alteration or misuse of personal or other information or content, including, without limitation, such information as has been provided to third parties or other users, or regarding the failure of a third party to abide by the agreement between us and such third party.

Marketing of our products or curriculum

We may contact you regarding products, curricula or events which may be of interest to you, provided that you have given us consent to do so or you have previously requested a similar product or service from us. You may request us to stop (opt out) sending you such communication at any time. Any direct marketing communication that we send to you will provide you with the information and means necessary to opt out of receiving such information in future. In the event that you wish to revoke all consent pertaining to your personal information and you would like us to remove and/or delete your personal information entirely, you must notify Impaq in writing, in advance, at <http://www.impaq.co.za/talk-to-us/>.

Keeping your data up to date and accurate

It is important that we have up to date and accurate records of your personal information. You may update your information by contacting the relevant department and answering the necessary security questions and/or following the required procedures put in place from time to time to effect the change of your information.

Your rights and who to contact

You have the right to:

- Know what personal information we have about you (or your learner);
- Request that we correct or update your personal information on our records;
- Report any misuse of your personal information.

We can be contacted in the following ways:

Phone our client service team on **087 405 2233** (Monday – Friday 09:00 – 15:00). Submit a query online, clearly setting out your concern or request to: <http://www.impaq.co.za/talk-to-us/>

To assist us in dealing with your request, please provide us with the full name and student number of the learner, or the full name of the account holder. To guard against fraudulent requests, we may require further information to verify your identity and the authenticity of the request.

We will endeavour to respond to your request or provide the information you have requested, within a reasonable time. We may charge an appropriate fee for the cost of fulfilling your request (e.g. photocopying and postage) to the extent permitted by the applicable law.

Changes to this statement

We may change this Privacy Statement from time to time by posting an updated version thereof on our Platform.

Consent

By using our Platform or registering as a client, you consent to our collection, storage and use of the personal information you provide in accordance with this Privacy Statement and you consent to our collection of any changes or updates that you may provide to any personal information you provided that has been collected by us. Such consent includes our right to collect, store and use the personal information you provide in respect of your learner.