



## **PRIVACY NOTICE**

The Click Foundation Trust is a charitable trust registered in South Africa (master's reference number IT 400/12) having its registered address at Office 293, 2nd Floor, Dunkeld West Centre, Cnr Jan Smuts Avenue & Bompas Road Dunkeld, Johannesburg, (**Click Learning, we, us, our**) is committed to protecting the privacy and security of your personal information.

Click Learning was established in 2012 to find ways of using technology in education to pursue outcomes-based interventions that can meaningfully impact learners. The primary focus of Click Learning has therefore been the implementation of an online phonetics based English literacy and, more recently, mathematical programmes as well as teacher and facilitator training (**Education Programme**).

This privacy notice sets out the basis on which any personal information Click Learning collects from you or third parties, or that you provide to Click Learning, will be processed by Click Learning. Please read the following carefully to understand our practices regarding your personal information and how we will treat it.

This Privacy Notice applies to students, parents, external facilitators, schools, third parties such as suppliers, funders/donors. For employees or persons applying for a job with Click Learning and their referees– kindly contact us and we will guide you to the correct privacy notice which covers our processing of your personal information.

## **INFORMATION WE COLLECT FROM STUDENTS, PARENTS, EXTERNAL FACILITATORS, TEACHERS AND SCHOOLS**

Click Learning collects and processes certain personal information about Students for the purposes set out in this notice, which information may include name, contact details, race, gender, age, identification number, LURITS (Learner Unit Record Information and Tracking System) number, Learner IDs from government systems such as CEMIS and the SA-SAMS, StuID numbers assigned to Students by us, education (including results), nationality, language and disability (in so far as it is required for assisting you in the Education Programme). In processing children's personal information, we ensure that we have appropriate authorisation or consent from the school, parent or legal guardian, as required under applicable law.

Click Learning also collects personal information of principals, teachers and external facilitators including full names, contact details, identification information for the purposes stipulated in this notice.

We also collect full names, contact details, addresses and bank details of the schools and government departments we work with for the purposes of collaborating/contracting with you, providing the Education Programme and communicating with you.



We collect names and contact details of student parents for the purposes of engaging with you to the extent necessary.

In some instances, Click Learning may receive your personal information from a third party, the school you attend or work at, the department in charge of the district in which your school is located and/or the provincial education department. Furthermore, Click Learning may collect your information from publicly available sources such as websites.

Click Learning collects your personal information for the following purposes:

- to assess and/or verify your suitability for participation in the Education Programme;
- to facilitate your enrolment in the Education Programme and give you access to the education software;
- to assist you in completing certain modules of the Education Programme;
- to obtain and maintain funding;
- for analysis, evaluation and research regarding the Education Programme;
- to carry out Click Learning's obligations or enforce your obligations arising from any contracts entered into between you and Click Learning;
- to communicate with you and to provide you with the information and services that you request from Click Learning and for Click Learning to request information it may require from you;
- to provide you with a SIM card and/or RICA you in so far as we are a RICA agent;
- to measure compliance with laws including, but not limited to, the Broad Based Black Economic Empowerment Act 53 of 2003 (as amended); and/or
- to inform you about Click Learning events or initiatives.

Sometimes we take photographs of students, facilitators and teachers for the purposes of our website and social media pages. We do this to promote our organisation and the Education Programme. We will only do this with your consent and the consent of the legal guardian of the students, which you can withdraw at any time by contacting us (see details at the end of this notice).

### **INFORMATION WE COLLECT FROM THIRD PARTIES**

We collect names, contact details, financial, B-BBEE information and tax information from suppliers, partners and professional service providers so that we can place orders/instruct you and make payment in respect of any goods or services we receive as well as to measure compliance with applicable laws. We do this on the basis of the intention of contracting with you or for the performance of a contract we have with you.

We collect names, registration numbers, addresses, financial information and contact details from partners and funders/donors on the basis that we have a legitimate interest in communicating with you, collaborating with you and to inform you about Click Learning events or initiatives.

Furthermore, if you are a donor and donate via our website or into our bank account, we collect your name and bank details for the purposes of processing that donation.

We collect names and contact details and CCTV footage of persons visiting our premises. We collect this information for security purposes.

We may also collect names and contact details from persons who contact us, attend events we host or sponsor or attend ourselves. We collect this information for the purposes of engaging with you or facilitating your attendance at our events.

### **COOKIES WE COLLECT WHEN YOU VISIT OUR WEBSITE**

Cookies are small text files that are placed on your device that help us improve our website, that help provide you with the best experience when you visit our site and when we communicate with you. They allow us to deliver Click Learning adverts relevant to you based on your interests when you visit other websites. We may use both 1st party and 3rd party cookies. 1st party cookies are set by Click Learning, 3rd party cookies are set by a partner on our behalf. Analytics cookies such as Google Analytics collect information such as your IP address, device type and operating system, referring URLs, location and pages visited and help us to:

- Personalise the website to your requirements
- Avoid asking you to register or complete details twice
- Estimate the number of visitors to our site, including the source and patterns relating to this traffic
- Understand how visitors use the site, and how we can enhance this experience
- Measure the effectiveness of our marketing communications, for example by telling us if you have opened an email we have sent you
- Display relevant advertising to you when you visit other websites.

You are able to set your devices to accept all cookies, to choose the types of cookies you accept, to notify you when a cookie is issued, or not to receive cookies at any time. For instructions on how to do this visit [www.aboutcookies.org.uk/managing-cookies](http://www.aboutcookies.org.uk/managing-cookies) .

### **WHAT IF YOU DON'T PROVIDE THE INFORMATION?**

Where possible, Click Learning limits, to the best of its ability, the amount of personal information collected from you. However, please note that in order for a school, teacher, facilitator or student to participate in the Education Programme, certain information is required and accordingly participation is dependent on Click Learning being able to collect and process that information.

Furthermore, if you wish to be considered for recruitment or as a supplier or partner, we need your information in order to consider your application or to conclude a contract with you or fulfil our obligations under a contract we may already have with you.

## **WHO DO WE SHARE YOUR INFORMATION WITH?**

Click Learning may disclose your personal information to third parties.

Such third parties may include donors/funders, partners, schools, the district and provincial education departments, facilitators and service providers (including IT and telecom suppliers, third party service providers, human resource providers, training service providers, online payment providers, consultants, professional advisers and volunteers) and government departments and authorities.

While we generally store all of the personal information that we collect about you in South Africa, it is possible that your personal information will be transmitted and hosted outside your region. In the event that your data is transferred outside of South Africa, we ensure it is protected by adequate safeguards, such as data protection agreements or by relying on countries with adequate protection laws. For example, our email and storage, accounting software and messaging service providers have servers outside of South Africa.

We ensure that countries to which your information is being shared either have adequate laws in place or that we entered into contractual arrangements to ensure the protection of your personal information.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

Under certain circumstances, you have the right to:

1. **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. **Request deletion or destruction of your personal information.** This enables you to ask us to delete or destroy your personal information. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
4. **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.



We will endeavour to respond to any such requests as soon as is reasonably practicable. In some instances, we may be able to charge a fee for responding to your request and will advise you of this and any applicable amount prior to responding.

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

You also have the right to lodge a complaint with the Information Regulator, details of which are set out below:

**Physical Address:** Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg 2191

**Postal Address:** P.O Box 31533

Braamfontein, Johannesburg, 2001

[POPIAComplaints@infoeregulator.org.za](mailto:POPIAComplaints@infoeregulator.org.za)

[PAIAComplaints@infoeregulator.org.za](mailto:PAIAComplaints@infoeregulator.org.za)

You should also be aware that in some instances, if you do not provide information or you exercise any rights regarding the deletion or restriction of your information or object to the processing of your information or withdraw consent, may not be able to engage with you or perform any contract we have with you.

#### **CHANGES TO THIS PRIVACY NOTICE OR YOUR INFORMATION**

Any changes made to this privacy notice in the future will be posted on the website and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this notice. Should your personal information change, please inform Click Learning and provide Click Learning with your corrected personal information as soon as reasonably possible to enable Click Learning to update your personal information on its systems.

#### **WHO CAN YOU CONTACT REGARDING YOUR PERSONAL INFORMATION AND THIS NOTICE?**

Should you have any queries regarding this privacy notice or would like to enforce any rights you may have under applicable data protection laws please contact us at: [compliance@clicklearning.org](mailto:compliance@clicklearning.org)



Changing little lives for big impact.  
[clicklearning.org](http://clicklearning.org)