

PRIVACY POLICY

1. WHO WE ARE

Lebone Media (Pty) Ltd (“**Lebone**”) is a 100% black owned organisation specialising in the development and delivery of turnkey educational solutions.



Lebone is committed to sound business practices, as well as protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently in compliance with POPI read with the Constitution of the Republic of South Africa.

2. WHAT THIS POLICY IS ABOUT

2.1 This privacy policy explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act 4 of 2013 (“POPI”).

2.2 This policy will set out the manner in which personal information is collected, managed, stored, used and protected by Lebone. This policy applies to all employees of Lebone and its subsidiaries or partners.

2.3 The objectives of this policy are to:

- process personal information lawfully in terms of POPI;
- provide a guideline as to the manner in which Lebone processes and protects personal information;
- adopt good practices in terms of processing of personal information;
- protect Lebone from the consequences of breaching its responsibilities in terms of POPI;
- display the commitment of Lebone to uphold and respect information privacy.

3. ESSENTIAL DEFINITIONS

3.1 **“personal information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to -

- 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;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- 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;
- the views or opinions of another individual about the person; or
- 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.



PERSONAL INFORMATION OF HUMANS AND COMPANIES

3.2 **“processing”** means any operation or activity or any set of operations, concerning personal information, including -

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information.



Data subject (you)

The personal information relates to (you) data subject, who is protected by POPI.

Responsible party (us)

The responsible party determines purpose of and means of processing personal information and remains responsible for processing.

4. TYPE OF INFORMATION WE COLLECT

4.1 Lebone collects and processes your personal information primarily to contact you for the purposes of understanding your requirements, due diligence and delivering services accordingly. For this purpose we will collect following types of personal information:

- Personal details, including but not limited to names, surname and ID number of customers, employees, representative of service providers and job applicants.
- Contact details, including email address, telephone numbers, physical addresses

4.2 Lebone collects and processes the personal information of our employees primarily to comply with labour and employment legislation and maintain good employee relations. For this purpose we will collect and process employee data, including salary, disciplinary records, banking details, account numbers and tax information.

4.3 Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

5. HOW WE PROCESS INFORMATION

5.1 WE ARE ACCOUNTABLE

As prescribed by POPI, Lebone will take responsibility and remains accountable for personal information in its possession and processed by it and will ensure that the conditions for lawful processing are given effect to and complied with. Lebone will take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary.

5.2 ONLY FOR THE PURPOSE WE NEED

5.2.1 Lebone undertakes to process personal information -

- lawfully, in accordance with POPI;
- in a reasonable manner that does not infringe your right to privacy.

5.2.2 Personal information will only be processed if -

- you consent thereto, alternatively, if you have entered into a contract with Lebone (in which instance express consent would not be required);
- processing is necessary to carry out actions for the conclusion or performance of a contract to which you are a party;
- processing complies with an obligation or duty required or imposed by law;
- processing protects a legitimate interest of yours;
- processing is necessary for the proper performance of a public law duty by a public body or
- processing is necessary for pursuing the legitimate interests of ours or of a third party to whom the information is supplied.

5.2.3 We will always collect personal information directly from you, unless -

- the information is from a public record or has deliberately been made public by you;
- you have consented to the collection from another source and this collection would not prejudice a legitimate interest of yours;
- collection of the information from another source is necessary -
 - to comply with an obligation imposed by law or to enforce legislation;
 - for the conduct of proceedings in any court or tribunal;

- in the interests of national security; or
- to maintain the legitimate interests of ours or of a third party to whom the information is supplied;
- collecting the information directly from you would prejudice a lawful purpose of the collection; or
- collecting the information directly from you is not reasonably practicable in the circumstances of the particular case.

5.3 WHY WE COLLECT PERSONAL INFORMATION

5.3.1 Lebone will collect personal information for the following and/or related purposes:

- References of an employee or job applicant, for purposes of employment
- Ensuring quality of delivery of services to customers
- Complying with contracts with various parties
- Confirmation of employment and vetting of employees
- Debt collection, including tracing in the event of default on payment
- Compliance with legislation
- Assisting in treating customers fairly, by having complete and up to date information about the customer
- Effective communication with clients and suppliers, to avoid misunderstandings or failure to communicate as a result of incorrect information
- Completion of application forms and contractual documents

5.3.2 Once personal information, processed and stored by Lebone, has been retained for the full term as dictated by Lebone or as required by law or industry standard or becomes in any way redundant, Lebone will destroy or delete the record of personal information in a manner that prevents its reconstruction in an intelligible form.

5.4 TRANSPARENCY

5.4.1 Lebone will ensure that all the documentation of processing operations under its responsibility will be stored and preserved for the required duration and purpose.

5.4.2 If personal information is collected, Lebone will take reasonably practicable steps to ensure that you are made aware (whether by means of contract, email notification or statement on its website) of all of the following -

- the information being collected or the source from which it is collected;
- our name and address (or that of the third party sender);
- the purpose for which the information is being collected;
- whether or not the supply of the information by yourself is voluntary or mandatory;
- the consequences of failure to provide the personal information;
- any particular law authorising or requiring the collection of the personal information;
- if we intend to transfer the information to a third country or international organisation, for instance where information is stored on a cloud server based in a foreign country, that the level of protection afforded to the information by that third country or international organisation is adequate.

5.5 WE PROTECT YOUR INFORMATION

5.5.1 Lebone undertakes to secure the integrity and confidentiality of personal information in its possession or under its control. This is done by taking appropriate, reasonable technical and organisational measures to prevent the loss of, damage to or unauthorised destruction of personal information, and unlawful access thereto (by either a third party or internally by someone within Lebone) or unlawful processing thereof.

5.5.2 Lebone has put in place the following adequate safeguards to secure the integrity and confidentiality of personal information:

- Physical access control to corporate office building
- Armed guards and 24 hours security with CCTV monitoring of approximately 300 cameras in and around the corporate office building
- Lockable offices and cabinets holding information
- Password protection on all employee computer logins
- Anti-virus on all employee computers
- Firewalls on all employee computers
- Biometric access control to server room
- Secure back-ups of information, stored in a secure location, which is encrypted

5.5.3 Lebone conducts periodical risk assessments regarding the processing of personal information, to determine the level of internal and external risks, as well as to implement measures to mitigate and minimise any risks identified.

5.6 IN CASE OF A DATA BREACH

Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, Lebone will as soon as reasonably possible after the discovery notify -

- the Information Regulator; and
- you, unless your identity cannot be established.

5.7 GET IN TOUCH WITH US

If you have any questions or concerns regarding this policy, your personal information held by Lebone, the correction or deletion of personal information or updating your personal information held by Lebone, you should contact Lebone by sending an email to info@lebonemedia.co.za.

6. HOW WE COLLECT INFORMATION

Lebone collects personal information in any of the following manners:

- Voluntary disclosure via multiple sources, including email, telephone, agreements, application forms and website forms
- Previous matric exam papers

7. 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 POPI.

