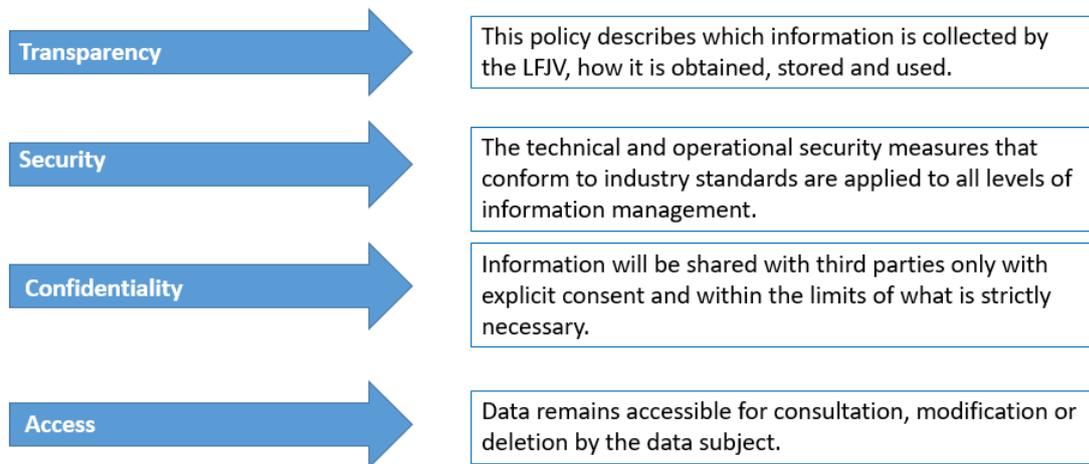


1- Purpose of the Policy

The purpose of this document is to provide information regarding the Privacy Policy of the Lycée Français Jules Verne NPO (hereinafter referred to as “LFJV”) in respect of the collection, use, dissemination, management and protection of the personal data of its pupils and their legal guardians (hereinafter collectively referred to as “personal information”). This policy is subject to the Protection of Personal Information Act (Act no. 4 of 2013) (“POPIA”) and the General Data Protection Regulation (UE) 2016/679 (“GDPR”).

The LFJV undertakes to protect personal information and to apply the rules and regulations that aim to guarantee respect for the confidentiality of this data:



2- Personal information collected

Information related to pupils

The LFJV collects and may use the personal information of pupils (such as their name, date of birth, photos, education and medical information) for the following purposes (non-exhaustive list):

- Conclusion and execution of the tuition contract
- compliance with relevant laws (e.g. the norms and standards of the South African Ministry of Education, the Agency for French Education Abroad (“AEFE”), the Department of Home Affairs, administrative dossiers, tax, etc.)
- Organisation related to courses and the publication of results obtained by pupils
- General administration (e.g. project management, communication related to work or teaching, school dossiers)
- Schooling (e.g. prizes, awards, certifications, academic achievements, schools frequented)
- Admission of pupils (e.g. new admissions, withdrawals/cancellations)
- Communication with parents or legal guardians
- School trips (e.g. organisation, logistics, medical needs, nutritional needs, registration)
- Registration for extra-curricular activities and activities related to secondary school
- Medical needs (e.g. allergies)
- Insurance (CGEA)
- Services provided to alumni
- Distribution of information to third party schools who request such information as part of their admission procedures.

In adherence to the tuition contract, unless expressly refused by the parents, the LFJV may use personal information related to pupils (name, photos, films etc....) for non-commercial purposes exclusively including:

- Internal use: school report, brochure, posters, class photo, year book, education projects etc...
- External use: internet website and social networks of the AEFE, internet website and social networks of the LFJV, presentation documents of the LFJV etc...

Information related to parents of pupils

The LFJV collects and may use the personal information of parents or legal guardians of pupils (such as names, date of birth, electronic mail address, telephone number, bank details) for the following purposes (non-exhaustive list):

- Conclusion and execution of the tuition contract
- Communication with parents or legal guardians (via the teachers, school management or administration)
- Medical needs in the event of an emergency (e.g. contacting the family in the event of an accident or major risk)
- School trips (e.g. organisation, logistics, medical needs, nutritional needs, registration)
- Invoicing and payment (e.g. invoicing related to school fees, final settlement, payment history, processing of payments)
- Sending of electronic mail to parents or legal guardians via distribution lists by the Parent Representatives (School Board, School Council, Primary School Council)
- Fund raising to the benefit of the school.

Information related to security at the Morningside and Pretoria campuses

The LFJV collects and may use personal data (such as surname, first name, birth date, identity document number, electronic mail address) in order to guarantee the security of persons at the Morningside and Pretoria campuses via the following means:

- Access to the sites by pupils takes place by means of a correspondence notebook and/or visual control
- Access to the sites by parents of pupils or third parties takes place via access cards and/or visual control.

Both sites are under video surveillance.

Forms and interactivity

Personal data is collected by means of forms including:

- Request for enrolment form
- Forms related to registration, re-registration and de-registration
- Digital workspace
- Other personalised forms (day-trips or trips with overnight stay/s, certification...).

Cookies and tracking of connection information

Personal data is collected by the LFJV via the use of cookies and/or tracking connection information such as: IP address at the time of connection, pages visited on the LFJV website and requests concluded, dates and days of connection and modification, if and where applicable.

This information is used to improve the service provided and to establish anonymous statistics.

3- Consent

In respect of data relevant to pupils, consent by legal guardians provides permission for the collection and or processing of personal information.

The legal guardian explicitly consents to the collection and/or processing of personal data by signing the tuition contract (see Article VI of the tuition contract) as well as the signature that appears on the various forms submitted that are related to specific projects (school trips, class trips etc.).

4- Management and protection of personal information

4.1 Security of information

The LFJV commits to:

- Implementing the appropriate security measures to protect personal information from accidental or unlawful destruction, loss, alteration, disclosure or unauthorised access, notably during the processing of data that involves the sending or storing on or within a network. In this regard, the LFJV implements the following measures:
 - Access to EDUKA, LIVREVAL, PRONOTE and Microsoft 365 takes place via a secure connection (HTTPS) on a protected sub-network

- Only authorised personnel have access to the information
 - The use of the network is monitored and detection of intrusion as well as an anti-virus programme are in place
 - The connection to EDUKA, PRONOTE, LIVREVAL and Microsoft 365 is protected by the combination of a username and password
 - The servers on which the various software applications are hosted by the LFJV are protected by a firewall.
- Notify the persons concerned as soon as possible in the event of accidental or unauthorised access to their information that could lead to damage or prejudice.

4.2 Right of access, correction and restriction

Parents have the right to view their personal information and that of their child/children (subject to the exclusions listed below) and to request **modifications** or **corrections** of this data.

Parents will be provided access to information stored regarding their child/children during the period that they are educated at the LFJV within the limits set by this policy.

Parents have unrestricted access to personal information held by the LFJV on the EDUKA portal as well as PRONOTE. Modification and/or correction is possible by the parents or by the LFJV on the parents' express request, at any time, as and when necessary.

In respect of personal information held by the LFJV that is not accessible via the EDUKA portal or PRONOTE, parents can exercise their right to access, modify or correct by sending a request to the following address : dpo@lyceejulesverne-jhb.net.

Exceptions to the right of access

The LFJV reserves the right to refuse access to:

- Qualitative data stored for the purposes of evaluation
- Copies of or results of examination papers
- Confidential written references in support of the candidature of a pupil to another education institution or course/s
- Information or documents that provide access to personal information of other individuals in violation of the current policy or the applicable law/s.

4.3 Right to the portability of information

Parents of pupils can extract their personal information via the EDUKA portal, in a structured format that is commonly used and machine-readable and have the right to transmit this information to another entity responsible for processing data.

To exercise this right, a parent connects to the EDUKA portal, "Account settings" and clicks on "Download my personal data". The system creates an encrypted and compressed file that is password protected.

4.4 Storing and deleting of data

The LFJV commits to the deletion or anonymisation of documents that contain personal information when:

- The purpose for which the information was collected no longer necessitates storing
- The storage of the information is no longer required for legal or processing reasons.

In accordance with the GDPR, parents have the right to the deletion of information under certain conditions. To exercise this right please contact the LFJV *Information Officer* at the following address: dpo@lyceejulesverne-jhb.net

4.5 Sharing of information with third parties

The LFJV may share personal information with third parties, service providers or agents (including travel agents, insurance companies or data hosting companies).

Personal information may also be transmitted to schools located outside of South Africa, to the AEFÉ, the French National Ministry of Education or any other institution.

The LFJV discloses this information exclusively to procure the requisite services from these third parties that fall within the scope of the tuition contract or ancillary services subscribed to by the parents (extra-curricular activities etc.).

The LFJV ensures, via the signing of a contract or any other appropriate means that the third parties use the information only for the intended purpose of providing the requisite service and take appropriate precautions to safeguard the data.

The LFJV will ensure that:

- The service provider is not allowed to use the information shared for any purpose other than the provision of the associated service
- The service provider takes all reasonable precautions to safeguard the information
- When the LFJV terminates a relationship with the service provider, all information is deleted and will not be used for any other purpose
- The service provider is compliant with POPIA and the GDPR.

5- Responsible person

For any questions or complaints associated with the protection of personal information please contact our *Information Officer* at the following address: dpo@lyceejulesverne-jhb.net.