



Privacy Policy - Students and Customers

Purpose

Welcome to our Privacy Policy. We are the Learn to Earn Group, comprising of Learn to Earn Trust and Learn to Earn Development Enterprise (Pty) Ltd and all its divisions (LtE), and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously.

The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

This Policy covers

1. Audience	Who this policy applies to.
2. Personal Information	Personal information includes information we collect (i) automatically when you visit our website, (ii) on registration, (iii) on submission, and (iv) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.
3. Acceptance	You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then you may not order our goods or request our services.
4. Changes to this policy	We may change the terms of this policy at any time by updating this on our web site. We will notify you of any changes by placing a notice in a prominent place on the website detailing the changes that we have made and indicating the date that they were last updated.
5. Collection of Personal information	We collect certain information when you register for a course, when you purchase, or order goods or request our services, when you visit our website or call us, which we then process.
6. Use of Personal Information	We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.
7. Disclosures of personal information	We may disclose personal information to third parties if required for legal reasons.
8. Security	Our website and our CRM database (Salesforce) are hosted on secure servers and use security measures to prevent interference by intruders.
9. Keeping Personal Information up to date	Please keep your personal information accurate and up to date by informing us by email or phone.
10. Retention of Personal Information	We will only retain your personal information for as long as it is necessary.
11. Updating or removing Personal Information	You may choose to update or remove the personal information you have submitted to us.

We respect your privacy. Callouts like this are a summary of our privacy policy and contain the most important and relevant points for you. Please read the full privacy policy because it applies to you.

The purpose of this policy is to describe the way that we handle your personal information.

1. Audience

This policy applies to you if you are:

- a customer who has ordered or requested the goods or services that we provide
- a potential student or student of Learn to Earn
- a donor to Learn to Earn
- a visitor to our website.

This policy applies to you under certain circumstances.

2. Personal information

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on course registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Personal information includes information we collect (i) automatically when you visit our website, (ii) on course registration, (iii) on submission, and (iv) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.

Common examples

Common examples of the types of personal information which we may collect, and process include your:

- **identifying information** – such as your name, date of birth, or identification number of any kind;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address; or
- **demographic information** – such as your gender or marital status.

Sensitive personal information

Depending on the goods or services that you require, we may also collect sensitive personal information including your:

- **financial information** – such as your bank account details;

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- **sensitive demographic information** – such as your race or ethnicity;
- **medical information** – such as information about your physical or mental health;
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- **employment information** and

3. Acceptance

Acceptance required

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with the content of the policy, then you may not order our goods or request our services.

You may not order our goods or request our services if you do not accept this policy.

Legal capacity

You may not access our website or order our goods or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

4. Changes

We may change the terms of this policy at any time by updating this on our website. We will notify you of any changes by placing a notice in a prominent place on the website detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website or our goods or services. If you continue to use the website or our goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

5. Collection

On course registration

Once you register as potential student or student, you will no longer be anonymous to us. You will provide us with certain personal information when you add your name to the course interest list or complete the paper registration forms.

This personal information will include:

- your name and surname;
- your email address;
- your telephone number;

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- your postal address or street address;
- and items listed in point 2

We will use this personal information to fulfil our services to you, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

We collect certain information on course registration, when you register.

On order or request

When you order our goods or request our services from us, you will be asked to provide us with additional information on a voluntary basis (**goods or services information**).

We collect certain information when you order our goods or request our services from us.

From web browser

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

We collect certain information from your web browser, including your Internet usage information when you visit our website.

Cookies

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- tailoring our website's functionality to you personally by letting us remember your preferences;
- improving how our website performs;
- allowing third parties to provide services to our website.

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at www.allaboutcookies.org.

We collect certain information from cookies that we may send to your computer to try and give you a personalised experience.

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Third party cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

Recording calls

We may monitor and record any telephone calls that you make to us, unless you specifically request us not to.

Purpose for collection

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for and providing our goods or services;
- **marketing purposes** – such as pursuing lawful related marketing activities;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information the next time you access the website;
- monitor website usage metrics such as total number of visitors and pages accessed.

We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.

6. Use

Our obligations

We may use your personal information to fulfil our obligations to you.

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Messages and updates

We may send administrative messages and email updates to you. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

We may use your information to send you administrative messages and email updates to you regarding the website and for marketing purposes where lawful.

7. Disclosure

Sharing

We do not share your personal information.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

We may disclose personal information to third parties if required for legal reasons.

No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

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8. Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Our website is hosted on a secure server and uses security measures to prevent interference by intruders.

9. Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time, we may request you to update your personal information. You are able to review or update any personal information that we hold on you by emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

Please keep your personal information accurate and up to date by emailing us or by phoning us.

10.Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

We will only retain your personal information for as long as is necessary.

11.Updating or removing

You may choose to correct or update the personal information you have submitted to us by contacting us by phone or email.

You may choose to update or remove the personal information you have submitted to us.

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12.Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

13.Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.

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