



PRIVACY POLICY

Introduction

At Club Engage we are committed to protecting the privacy of the personal information we collect about any person and to ensuring our compliance with Protection of Personal Information (POPI) Act 4 of 2013, regulations were gazetted on 8 September 2017. This privacy statement describes why and how we collect and use personal data and provides information on individuals' rights.

In-order to conduct normal business operations, Club Engage will collect personal information in-order to provide our services (namely Before Care, Aftercare, Holiday Care, and other services, for children, under the brand Club Engage) safely and effectively, and to operate our business, to hire, train and manage our staff.

Notwithstanding the means of collection, processing, use, disclosure and retention periods for each purpose, this policy forms the overarching policy and guidelines of personal information collected.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

Exclusions

This policy relates to Club Engage collection and handling of personal information that is covered by POPI. It is not intended to cover categories of personal information that are not covered by the POPI unless otherwise specified.

Nature of Information collected

Club Engage will collect, store and use personal information from customers, suppliers, employees, contractors and other individuals. We collect and hold this information when it is necessary for business purposes.

Typically, this information includes, as appropriate:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth, gender, marital status, and dependants.
Next of kin and emergency contact information.
- Personal information about children on our programmes such as name, addresses, date of birth, gender, hobbies, and interests.
- Employment History details
- Financial information as deemed necessary to fulfill contractual service provision.
- Photographic proof of identity.

Sensitive Information

Club Engage may also collect, store, and use the following sensitive personal information that is deemed as "Special categories":

- Information about a child's race or ethnicity, religious beliefs, and sexual orientation.



- Information about a child's physical and mental health, including any medical conditions, health and sickness records, and details of primary healthcare provider.
- Information relating to a prospective employee's criminal history
- Information relating to a child's custodial situation, including any court orders or enforcements.

Club Engage collects this information, in-order to fulfil our legal responsibilities as a child- care provider, and in order to provide our contractual services to the customer.

Collection of Personal information

Club Engage will collect most information directly from the individual or third parties, and by dealing with Club Engage you agree that we may collect, store, use and disclose your personal information for the purposes and in the manner outlined in this privacy policy. Information is collected via forms completed by the individual, face to face meetings, email messages, telephone conversations or digital forms via our website or Child Care Management system (programme bookings system).

How Club Engage uses the Personal information

Club Engage will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To perform our obligations under a contractual relationship with you; or
- To comply with a legal obligation; or
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, such as reviewing the quality of the services we provide to you.

Specifically, Club Engage may also use your personal information in the following situations:

- Where we need to protect your interests (or someone else's interests),
- When providing our services to you,
- Where it is needed in the public interest or for official purposes, and as directed by current legislation,
- Where we are required to make investigative enquiries,
- When dealing with requests, enquiries or complaints and other customer care related activities,
- To assess our capability to provide our services,
- To Review and improve our services, standards, and procedures,
- To ensure the safety and welfare of the children in our care,
- To determine performance requirements,
- For education, training, and development requirements,
- To comply with current health and safety obligations,



- For business management and planning, including audit purposes.
- In connection with monitoring, testing and maintenance of computer and other IT systems and networks,
- For general administrative and business purposes,
- In connection with the transfer of any part of our business involving you as a customer, employee, supplier, school/venue provider partner, contractor or franchisee (as the case may be)
- To process payment instruments.
- To create, manufacture, and print payment advice (like invoices).
- To market our service offerings, specials, campaigns and promotions.

Disclosure of Personal Information

Club Engage will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you, or where we have another legitimate reason in doing so (including for any of those purposes outlined above). Some of your information may be shared with:

- Relevant members of our staff, who need to know this information in-order to provide our services. In this case, only directly relevant information will be shared with certain staff members as appropriate for them to fulfil their obligations to the individual and to Club Engage
- Third parties who deliver our services to you (who may use and disclose your personal information for the same purposes as us), eg the online booking system Aimy Plus, other Club Engage franchisees, contractors, payment service providers, and system hosting services.
- Professional advisers, for example, law firms, debt collection agencies and others as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our business. Personal data may be shared with these advisers as necessary in connection with the services they have been engaged to provide.
- Parties and agencies involved in data protection and/or crime prevention, detection, investigation and/or prosecution.
- Other parties, when explicitly requested by you in writing.
- Other parties (including for example government agencies) in accordance with our legal obligations under The Children's Act 38 of 2005 or other relevant legislation.
- We may also share non-personal, de-identified and aggregated information for research or promotional purposes. Except as set out in this policy, we do not sell to or trade personal information with third parties.

Retention of Personal information and Data

Personal information collected by Club Engage may be stored via paper-based forms or electronically.



All paper-based documents are held in secure filing systems by Club Engage Franchisees and are directly accessible only by a small number of key personnel who have the appropriate authorisation to access the documents.

Electronic storage of personal data is retained in secure, password protected and where necessary, encrypted software platforms and products. This is accessible by key personnel who require access explicitly for the purpose to perform their roles in relation to providing Club Engage services.

Club Engage retain personal information and data processed for as long as is required for the purpose for which it was collected, and in accordance with the current legislative requirements.

In some instances, personal information may be held for longer periods where extended retention periods are required by law or regulation and as necessary in-order to defend our legal rights.

At the conclusion of the retention period, individual's information will be destroyed via the following methods:

- Paper based, via a confidential and secure destruction service,
- Electronically held data – will be deleted or anonymised as applicable and all third parties will be notified to do the same as appropriate.

Storage of information in cloud systems

Club Engage may store personal information within services provided by offshore cloud service providers (CSP's). Club Engage will make every endeavour to ensure that all CSP providers meet the POPI Act requirements and all other Legislative requirements that Club Engage is obliged to adhere to.

Transfer of Information outside of SA

Occasionally, and for legitimate legal and/or business reasons (including for those purposes described in this privacy policy), it may be necessary to share personal information with our international child booking management system.

Privacy on our Web Sites and Applications

This policy also applies to any personal information we collect via our websites and any Club Engage applications, including mobile applications. For further information specific to the use of Club Engage websites and other applications, please refer to Club Engage Online privacy policy located at the bottom of the webpage.

Children's Privacy

Our service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided the company with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

Right to Access Personal Information



Club Engage will provide access to personal information upon request by an individual (or their representative) once identity has been satisfactorily confirmed. If at any time you wish to enquire about the personal information we hold about you, you may contact us support@clubengage.co.za

- Users are able to change their personal information- By emailing, calling, logging in to their account,
- Users can visit our site anonymously
- Users will be notified of any privacy policy changes

Corrections and Concerns

If Club Engage provides you access to personal information that it holds about you, you may also,

- **Request a correction** of the personal information that we hold about you. This enables you (and assists us to ensure) that the personal information we hold about you is always accurate, current, complete and not misleading. If Club Engage informs you that it will not make the correction sought, then you have the right to make a complaint to the Information Regulator in respect of that refusal.
- **Provide us with a Statement of Correction** for us to attach to the personal information we hold about you, if we do not correct the personal information you have requested us to.

If you would like to exercise any of the above rights, please contact your Club Engage franchisee directly or head office.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Right to Complain

If Club Engage become aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you consider you have cause for complaint, please contact Head Office. If you are not satisfied with our handling of your concern, you may make a complaint to the Information Regulator- <https://www.justice.gov.za/infoereg/>

Privacy Breach

If we become aware of a privacy breach, we will take the following actions:

- Take all reasonable steps to immediately contain the breach contracted 3rd parties specialising in privacy/data breaches and/or key personnel with the appropriate expertise.
- Assess the seriousness, the cause, the extent, and the possible harm resulting from the breach,
- If we reasonably believe that the privacy breach has caused or is likely to cause serious harm to affected parties (after taking into account any mandatory considerations imposed by the SA Privacy Act), we will notify the affected parties, the Information Regulator and any third party required for notification and/or follow up (for instance, our Insurers, governmental agency(ies) and other agencies connected with data protection or crime detection, investigation, prevention or prosecution) as soon as practicable after becoming aware of that



notifiable privacy breach (unless we are not required to do so pursuant to any permitted exception specified under the SA Privacy Act)

- Review our processes and update our policies and prevention plans, as necessary.

If at any time you would like to unsubscribe from receiving future emails, you can email us at: contact at support@clubengage.co.za and we will promptly remove you from ALL correspondence.

Contacting Us

If there are any questions regarding this privacy policy you may contact us using the information below.

- Your local franchisee
- Website – www.clubengage.co.za
- Head Office- support@clubengage.co.za