

This privacy notice provides details of the personal information we collect from you, what we do with it, how you might access it and who it might be shared with.

**Our Organisation**

Moonstone Business School of Excellence (PTY) Ltd  
 25 Quantum Street  
 Techno Park, Stellenbosch  
 7600  
 South Africa  
 Telephone: 021 883 8000  
 Organisation E-mail address: Info.officer@moonstoneinfo.com

**What we do with your personal information**

We use your personal information only for the purpose for which it is collected. Among others, this purpose could be to provide a service, assist us with administration, recruit prospective employees or even to comply with a legal obligation. We may use your personal information for other similar purposes, including marketing and communications, but that will only occur in the case where we have your consent or another lawful justification for doing so.

From our **Students** we collect, use and retain personal information for the following purposes, with the applicable lawful basis:

| Processing purpose  | Lawful basis   |
|---|--|
| Student examinations and assessments                                | S11 - To conclude or perform a contract to which the data subject is party |
| Billing and Financial Management                                    | S11 - To conclude or perform a contract to which the data subject is party |
| Qualification administration of the FETC qualifications             | S11 - To conclude or perform a contract to which the data subject is party |
| Qualification administration of the Higher Education qualifications | S11 - To conclude or perform a contract to which the data subject is party |
| Qualification administration of the QCTO qualifications             | S11 - To conclude or perform a contract to which the data subject is party |

From our **Customers / Clients** we collect, use and retain personal information for the following purposes, with the applicable lawful basis:

| Processing purpose  | Lawful basis   |
|---|--|
| Qualifications, COB, CPD and Short Courses Sales                    | S11 - To conclude or perform a contract to which the data subject is party |
| Receipt and approval of applications for COB, CPD and short courses | S11 - To conclude or perform a contract to which the data subject is party |
| Billing and Financial Management                                    | S11 - To conclude or perform a contract to which the data subject is party |

## What personal information do we collect?

We only collect the minimum amount of information that is relevant to the purpose. If you interact with us on the internet, the personal information we collect depends on whether you just visit our website or, use our services. If you visit our website, your browser transmits some data automatically, such as your browsing times, the data transmitted and your IP address.

If you make use of our services, your personal information is required to fulfil the requirements of that service and enable us to meet the obligations stipulated in the underlying contractual agreement.

Generally, we collect the following personal information where applicable:

- Education Results (applicable to qualifications and short courses);
- Physical address;
- Identification Number;
- Employment history (applicable to qualifications and short courses);
- Financial & banking details;
- Name, together with other identifying information;
- Gender;
- Marital Status (applicable to qualifications and short courses);
- Telephone number;
- Educational history (applicable to qualifications and short courses);
- Email address.

*Special personal information* could be about your health, your racial or ethnic origin, your trade union membership, political persuasion, biometric information or criminal behaviour. We collect the following special personal information, for purposes of our qualification enrolments, on the appropriate lawful basis:

- Health or sex life
  - S27 - For the establishment, exercise or defence of a right or obligation in law
  - Higher Education Act 101 of 1997
  - National Qualifications Framework Act 67 of 2008
- Race or ethnic origin
  - S27 - For the establishment, exercise or defence of a right or obligation in law
  - Higher Education Act 101 of 1997
  - National Qualifications Framework Act 67 of 2008
- Biometric information
  - S27 - For the establishment, exercise or defence of a right or obligation in law
  - Higher Education Act 101 of 1997
  - National Qualifications Framework Act 67 of 2008

We collect your personal information from the following indirect sources (where applicable):

| <b>Data subject type</b>        | <b>Personal information type</b>                  | <b>Indirect source name</b>   |
|---------------------------------|---|---|
| Students                        | Education Results                                 | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students<br>Customers / Clients | Gender  | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Customers / Clients             | Marital Status                                    | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students<br>Customers / Clients | Physical address                                  | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students<br>Customers / Clients | Identification Number                             | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students<br>Customers / Clients | Telephone number                                  | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students<br>Customers / Clients | Education history                                 | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students<br>Customers / Clients | Email address                                     | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students<br>Customers / Clients | Financial & banking details                       | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students<br>Customers / Clients | Name, together with other identifying information | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| <b>Data subject type</b>        | <b>Special personal information type</b>          | <b>Indirect source name</b>   |
| Students<br>Customers / Clients | Health or sex life                                | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |
| Students                        | Race or ethnic origin                             | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |

|                                 |                       |   |
|---------------------------------|-----------------------|---|
| Customers / Clients             |                       |   |
| Students<br>Customers / Clients | Biometric information | Employer - If his/her corporate applies on his/her behalf, the corporate supplies the Data Subject's info |

### Who might we share your personal information with?

To maintain and improve our services, your personal information may need to be shared with or disclosed to our service providers, other organisations such as ours or, in some cases, public or legal authorities.

### Where applicable, we transfer personal information to the following organisations and countries:

| Data subject type               | Organisation name  | Type              | Country      |
|---------------------------------|--|-------------------|--------------|
| Students                        | Assessors  | Operator          | South Africa |
| Students<br>Customers / Clients | Council on Higher Education (CHE)                          | Responsible Party | South Africa |
| Students                        | Department of Higher Education and Training (DHET)         | Responsible Party | South Africa |
| Students                        | Insurance Sector Education and Training Authority (INSETA) | Responsible Party | South Africa |
| Students                        | Kanbanize  | Operator          | Bulgaria     |
| Students                        | Moderators   | Operator          | South Africa |
| Students<br>Customers / Clients | Moonstone Information Refinery (Pty) Ltd                   | Responsible Party | South Africa |
| Students<br>Customers / Clients | Quality Council for Trades & Occupations (QCTO)            | Responsible Party | South Africa |
| Students<br>Customers / Clients | Sage Pastel  | Operator          | South Africa |
| Students<br>Customers / Clients | South African Qualifications Authority (SAQA)              | Responsible Party | South Africa |
| Students                        | Student's employer (where applicable)                      | Responsible Party | South Africa |

If we transfer your personal information outside of South Africa, we apply the necessary safeguards which include, confirming whether the receiving country has the proper data protection law, ensuring that there is a binding agreement between parties or, if the transfer is internal to our organisation, commitment to binding corporate rules. Details of these safeguards may be obtained by contacting us directly.

### **How do we look after personal information?**

We limit the amount of personal information collected to only what is fit for the purposes as described above. We restrict, secure and control all our information assets against unauthorised access, damage, loss or destruction - whether physical or electronic. While in our possession, together with your assistance, we try to maintain the accuracy of your personal information.

### **How can you access your personal information?**

You have the right to request access to any of your personal information we may hold. If any of that information is incorrect, you may request that we correct it. If we are improperly using your information, you may request that we stop using it or even delete it completely.

**If you would like to make a request to see what personal information of yours we might hold, or object to the processing of your personal information, you may make a request from our organisation website or contact us as per the details above.**

Where it may have been necessary to get your consent to use your personal information, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal information without affecting the lawfulness of processing based on consent before your withdrawal.

### **Our Information Officer**

Hjalmar Bekker

E-mail address: [Info.officer@moonstoneinfo.com](mailto:Info.officer@moonstoneinfo.com)

Telephone: 021 883 8000

### **The SA Information Regulator**

You have the right to lodge a complaint with the SA Information Regulator. See the Information Regulator contact details below:

The Information Regulator (South Africa)

PO Box 31533

Braamfontein

27 Stiemens St

Braamfontein

E-mail address: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za) / [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)