

EDU360 INTEGRATED EDUCATION



POPIA MANUAL

Contents

EDU360 INTEGRATED EDUCATION	1
Acronyms and Abbreviations	3
Background	4
Aims and Intent	4
Company Information	5
Publication and Availability of Certain Records – Chapter 2, Section 51	5
Contact Details of the Business Owner – Section 51(1)(a)	5
Contact Details of the Information Officer – Section 51(1)(b)	6
Information, Records and Documents Available in Accordance With Other Legislation – Section 51(1)(d)	6
Access to Records (Only upon Request) - Section 51(1)(e)	8
Records Available (Without a Request) in terms of the Act	9
Categories of Information Held by EDU360	9
The Process - Requesting Access to an EDU360 Record	11
Refusal of Access to Records	12
Prescribed Fees	14
Information Request and Processing Fee Schedule	15
Protection of Personal Information that is Processed by EDU360	16
Personal Information of a Data Subject	16
Purpose of the Processing of Personal Information and Special Personal Information	18
Categories of Data Subjects and Personal Information and Special Personal Information	20
Recipients of Personal Information	22
Cross Border Transfers of Personal Information	22
Objection to the Processing of Personal Information by a Data Subject	23
Request for Correction or Deletion of Personal Information	23
Availability Of This PAIA Manual - Section 51(3)	23

Acronyms and Abbreviations

- “The Act” – the Promotion of Access to Information Act, Act No. 2 of 2000.
- “The Constitution” – the Constitution of the Republic of South Africa
- “Company” – EDU360, a registered Non-Profit Organisation with accreditation, makes educational services accessible to neurodiverse individuals.
- “SAHRC” – the South African Human Rights Commission.
- “Information Officer” or “IO” – The Information Officer appointed at your organisation.
- “Information Regulator” or “IR” – The official Information Regulator appointed by Government.
- “Third Party” – In this manual third parties also refer to Data Subjects.
- “Data Subject” – any natural or juristic person for which EDU360 holds or retains pertinent Personal Information or Special Personal Information.
- “Personal Information” or “PI” – Information held for a natural and/or juristic person.
- “Special Personal Information” or “SPI” – Information held for a natural and/or juristic person, with additional processing rules.

Background

1. The Promotion of Access to Information Act, No. 2 of 2000 (the "Act") was enacted on 3 February 2000, giving effect to our constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 (the "Constitution"), providing access to any information held by the state, or another body.
2. In terms of section 51 of the Act, EDU360 is required to compile and curate an Information Manual ("PAIA Manual").
3. Where a request is made in terms of the Act, EDU360 is obliged to release the information, subject to applicable legislative and/or regulatory requirements.
4. The EDU360 POPIA Manual complies with the requirements mentioned in section 10 of the Act, recognising that in terms of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act.
5. "Staff" refers to any person employed in a full-time capacity by EDU360 who:
 - a. Conducts or carries out business on EDU360's behalf,
 - b. Works for or provides services to EDU360, or on EDU360's behalf.
 - c. Receives or is entitled to receive remuneration from EDU360.
 - d. This includes:
 - i. All forms of directorships or ownerships.
 - ii. All permanent, temporary, or part-time staff, as well as contracted professional associates.
6. The manual may be amended from time to time; when relevant amendments have been finalised, the latest version of this manual will be made public.

Aims and Intent

1. The aim of this manual is to assist potential information requestors in their approach to the EDU360. It explains the procedure to be followed when requesting access to information/documents from EDU360, as contemplated in terms of the PAIA.

2. Since 4th July 2016, EDU360 conducts internal operations in a transparent and ethical manner. This document serves to elevate EDU360's operations from an internal-only to an internal-and-external transparent and ethical process.
3. The intent of EDU360's PAIA Manual is to promote the right of access to information, fostering a culture of transparency and accountability. Externally, EDU360 provides information requestors with the right of access to relevant information, in a reasonable timeframe, so that requestors may exercise their personal rights, also specific rights, to guard and protect information of the requestor.

Company Information

1. EDU360 provides quality, special needs educational access, for children aged 10 years and above, through our onsite and online channels of care.
2. Our services are tailored to provide specialist wrap-around care to EDU360 students, parents, and members of our community.
3. EDU360 is supported by parents, families, guardians, and sponsors to bring educational intentions to life. We work to support neurodiverse communities, providing services to enable learning-for-life, beyond school.

Publication and Availability of Certain Records – Chapter 2, Section 51

Contact Details of the Business Owner – Section 51(1)(a)

Mr Justin Barry

Block E/F, Edenburg Terraces, 348 Rivonia Boulevard, Rivonia, 2188

Telephone number: 011 234 1212

Email address: justin@edu360.education

Website: www.edu360.education

Contact Details of the Information Officer – Section 51(1)(b)

1. EDU360 has an appointed Information Officer to assess requests for information as well as to oversee the required provisions in terms of the Protection of Personal Information Act 4 of 2013, and the Promotion of Access to Information Act 2 of 2002.
2. Requests for information should be submitted in writing to the EDU360 Information Officer, marked for the attention of:

Ms Cleona Samaroo

Block E/F, Edenburg Terraces, 348 Rivonia Boulevard, Rivonia, 2188

Telephone number: 011 234 1212

Email address: cleona@edu360.education

Website: www.edu360.education

Information, Records and Documents Available in Accordance With Other Legislation – Section 51(1)(d)

Where applicable to our operations, the EDU360 organisation keeps information/ documents in a variety of formats in accordance with South African Governmental and Departmental requirements, and the associated legislative requirements, see below.

Please note: This is not an exhaustive list.

- Basic Conditions of Employment Act, No. 75 of 1997
- Basic Conditions of Employment Amendment Act No. 12 of 2002
- Broad- Based Black Economic Empowerment Act, No. 75 of 1997
- Broad-Based Black Economic Empowerment Act, No. 53 of 2003
- Business Act, No. 71 of 1991
- Children’s Act, No. 38 of 2005
- Companies Act, No. 71 of 2008
- Compensation for Occupational Injuries & Diseases Act, No. 130 of 1993
- Competition Act, No.71 of 2008
- Constitution of the Republic of South Africa
- Consumer Protection Act, No. 68 of 2008

- Copyright Act, No. 98 of 1978
- Department of Environmental Affairs
- Department of Health and the Environmental Health Practitioner (EHP)
- Department of Transport
- Department of Water Affairs
- Disclosure of Protected Information Act, No. 26 of 2000
- Early Childhood Development Norms and Standards
- ECD Forum and/or Association
- Electronic Communication and Transactions Act, No. 25 of 2002
- Employment Equity Act, No. 55 of 1998
- Financial Intelligence Centre Act, No. 38 of 2001
- General Data Protection Regulations
- Health and Social Care Professionals Act 2005
- Identification Act, No. 68 of 1997
- Income Tax Act, No. 58 of 1962.
- Intellectual Property Laws Amendment Act, No. 38 of 1997
- International Standard for Records Management (ISO15489)
- Labour Relations Act No. 66 of 1995
- Labour Relations Amendment Act, No. 1 of 2002
- National Archives and Records Service of South Africa Act, No. 43 of 1996
- National Credit Act, No. 34 of 2005
- National ECD Integrated Development Plan 2015
- Non-profit Organisations Act, No. 71 of 1977
- Occupational Health & Safety Act, No. 85 of 1993
- Occupational Health and Safety Act, Act No. 85 of 1993.
- Promotion of Access to Information Act, No. 2 of 2000 (PAIA)
- Promotion of Administrative Justice Act, No. 3 of 2000 (PAJA)
- Protection of Personal Information Act, No. 4 of 2013 (POPIA)
- Public Finance Management Act, No. 1 of 1999

- Skills Development Act, No. 97 of 1998
- Skills Development Levies Act, No. 9 of 1999
- South African National Standard for Records Management (SANS 15489)
- South African School's Act, No. 84 of 1996
- Unemployment Insurance Act, No. 63 of 2001
- Unemployment Insurance Act No. 30 of 1966
- Value Added Tax Act, No. 89 of 1991

It is further recorded that accessibility of requestors to EDU360 documents and records, in a variety of formats, may be subject to grounds of refusal as set out in this PAIA Manual.

Access to Records (Only upon Request) - Section 51(1)(e)

1. No notice is published informing the categories of records that are automatically available before a genuine and verified request to access information is received in terms of Section 52(2) of PAIA.
2. Access to records held by EDU360 may be accessed and granted by requestors once all prerequisite requirements for access have been met.
3. A requestor is any person making a request for access to a record.

There are two types of REQUESTOR:

a. Personal Requester

- i. A person seeking access to a record containing Personal Information, about themselves.
- ii. Upon satisfaction of request process integrity, EDU360 will grant and provide the requested information or give access to the record. A standardised cooling off period may apply before a request is actioned. The prescribed fee will apply.

b. Other Requester

- i. A person requesting access to information on a third-party basis, or as a third party on behalf of a student, family or EDU360 community member.

- ii. When considering a decision to deny or grant access to information, EDU360 will strictly adhere to the provisions of the Act.
- iii. EDU360 will take all reasonable steps to inform the third party, and inferred or attached parties, that access to information has been requested.
- iv. In scenarios where the information is deemed confidential, the third party will be given the opportunity to allow or deny the request for access, in writing before access will be considered.
- v. Upon satisfaction of request process integrity, EDU360 will grant and provide the requested information or give access to the record. A standardised cooling off period may apply before a request is actioned. The prescribed fee will apply.

Records Available (Without a Request) in terms of the Act

1. Records of a public nature, such as those disclosed on the EDU360 website, may be accessed without the need to submit a request in writing.
2. Other non-confidential records, such as statutory records maintained at CIPC or DSD, may also be accessed without the need to submit a formal application.
3. However, access to view any EDU360 document or record, will always have to be lodged by the requestor with the EDU360 Information Officer, for quality of information control purposes and child protection reasons, potentially.

Categories of Information Held by EDU360

Category: Admissions	
Admission register	Medical rules and regulations for parents
Admission agreement	Parent general information
Admissions application form	
Admissions policy	

Category: Companies Act	
Minutes of meetings	Routine and scheduled meetings
Auditors, Directors	Records relating to the appointment of auditors, directors, prescribed officers, public officers, company secretary
Documents of incorporation	Share certificates
Index of names of directors	Share registers and other statutory registers

Category: Curriculum	
Assessments	Results of children's activities
Daily lessons plan	Results of children's fine motor activities
Day book	Weekly activity plan
Reports	

Category: Employment and Human Resources	
Application for Employment	COVID 19 compliance officer
Certificate of service	POPIA Information officer
Code of conduct	POPIA operator
Contact details lists	Leave records
Disciplinary action procedures and documentation	Letter of appointment
Discipline and Grievance policy and agreement	Payroll reports
Disciplinary process records	Staff attendance register
Employee contact details list	Warning procedures and documentation
Employee exit and interview questions	
Employee performance analysis	
Employment agreement	
Grievance procedure and documentation	
Job description	

Category: Financial Records	
Accounting records	Inventory and stock take
Annual financial statements	Invoices and proof of payment
Asset registers	Records of UIF payments
Bank account details	Rental agreements
Bank statements	Skills development levies
Banking records	Tax documents issued to staff
Debtors and creditors statement and invoices	Tax returns
Financial policies and procedures	Workman's compensation payments
General and subsidiary ledger and journals	
General reconciliations	
Income tax and PAYE records	

The Process - Requesting Access to an EDU360 Record

The Requester must:

- Comply with all the procedural requirements contained in the Act relating to requesting access to a record.
- Complete the prescribed form (see Annexure A) with sufficient detail to allow the Information Officer to identify:
 - The document or information record requested, and
 - The identity of the Requester, leading to verification.
- Specify a postal address or email address, originating or primarily operated within the Republic of South Africa, for the Requested Records to be sent.
- State that the Requestor (he/she):
 - Requires the information to exercise or protect a right.
 - Stating clearly, what that right is.
 - Lastly, clearly specifying why the record requested is necessary to exercise or protect such a right.

- The request received by EDU360 must be accompanied by the associated proof of payment of the prescribed fee and/or applicable deposit.
- EDU360 will process the request within 30 (thirty) days, unless the Requester has provided valid and special reasoning, to the satisfaction of the Information Officer, that circumstances dictate that the records are required sooner than the above, standard time frame.
- The Information Officer will notify the Requester of the outcome of their request to access EDU360 data in writing. If the request is denied and the Requester asks for reasons for the denial of access to information, the Information Officer is obliged to respond and provide the particular reasoning, within a 30 (thirty) day period.
- If a request is made on behalf of another person, the Requester must submit proof of their own identity and proof that he/she is legally capacitated to make the request, to the satisfaction of the Information Officer.
- Where a person is unable to complete the prescribed form because of illiteracy, neurodiversity or disability occurrence, assistance may be requested from the Information Officer, directly.
- The Requester must pay the prescribed fee before information processing occurs, and before access may be granted by EDU360 or received by the requestor.
- If information required by the Information Officer is not provided by the Requestor, the process may be delayed until such time as it is provided to expectation.
 - This means that the processing period limit of 30 days will not commence until such time that all information has been provided by the Requestor.
- Where possible, to satisfy good standards of operation, the EDU360 Information Officer will extract parts of records when providing the information to Requestors so as not to disclose unnecessary information beyond that which has been requested.

Refusal of Access to Records

1. EDU360 has the right to refuse a legitimate request for information when it relates to the disclosing of Personal Information of a third party for the mandatory protection of:

- a. The privacy of a third party who is a natural person or a deceased person or a juristic person.
 - b. Contractual agreements.
 - c. A third party's commercial information where it contains trade secrets, financial, scientific and/or any other information that could cause harm to their interests, negotiations and/or commercial competition.
 - d. Confidential information of third parties where the information is protected in terms of any agreement.
 - e. The safety of individuals and the protection of property.
 - f. Records which would potentially be regarded as privileged in legal proceedings.
2. EDU360 has the right to refuse a request for information when it relates to disclosing of its own information for the mandatory protection of:
- a. Any IT operation, where a computer programme or software/hardware configured operation, which is appropriately licensed to EDU360, is protected by copyright or a relevant agreement.
 - b. Any trade operation or course registration and accreditation and processing information, regarded as necessary and related to the primary operating concern of the business, which is appropriately licensed to EDU360. This information is potentially sensitive and may be regarded as an intellectual trade secret and pivotal component to the successful operation of the EDU360 organisation, protected by copyright or a relevant agreement.
 - c. Any sensitive and/or protected research information, where the Requestor could potentially disclose the identity of EDU360 volunteer participants, the researcher or the subject matter, if it places the quality of the research at a disadvantage, in a negative academic perception or devalues the integrity of the research work undertaken.
 - d. All requests for information will be assessed on their own merits and in accordance with applicable legal principles and legislation.
3. If a requested record cannot be found or if the record does not exist, the EDU360 Information Officer shall provide an affidavit, if required, and notify the Requester that it is not possible to give access to the requested record.

4. This notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act.
5. Should a record be found at a later/delayed date, the Requester shall be informed and ask to provide additional confirmation of the option to be actioned for the outstanding information. Access will be given to the Requestor in the prescribed manner.

Prescribed Fees

1. The Act provides for two types of fees.
 - a. A request fee:**
 - i. An administration fee to be paid by all Requestors, except Personal Requestors.
 - ii. A Request Fee is not negotiable or refundable.
 - b. An access fee:**
 - i. Paid by all Requestors, when a request for access is granted.
 - ii. This fee is inclusive of costs incurred by the private body in obtaining and preparing a record for delivery to the Requester.
2. When a request is received by the Information Officer, the Requester (other than Personal Requestors) shall pay the prescribed fee.
3. When searching for a requested record and preparing it for disclosure takes more than the prescribed number of hours, according to the Act regulations, the Information Officer shall notify the Requester:
 - a. The revised amount for access to a specific record/information.
 - b. The prescribed portion of the fees to be paid as a deposit, should the request be granted.
 - c. The balance of the access fee to be paid before the record will be cleared for released.
4. The access fee is calculated to include provisions for:
 - a. Searching of information records.
 - b. Processing of permissions.
 - c. Preparations of data.

- d. Making controlled copies of the record for access granting.
 - e. Making reasonable time allowances in accordance with the prescribed hours to run the above functions.
5. The Information Officer will refund a deposit to the Requester if access to the record is denied, and a deposit is paid. Remember, the Request Fee is not refundable.

Information Request and Processing Fee Schedule

Please note that where at all possible, a quotation for the Access Fees will first be furnished to the requester, below the mandatory 6-hour data processing requirement. This is separate to the Request Fee.

Also, note that the Access Fee will be guided and/or influenced by the requested data's equivalent physical page count, regardless of the preparation and presentation media chosen for controlled distribution.

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R2.50 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:

For every photocopy of an A4-size page or part thereof	R2.50
For every print-equivalent copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R2.50
For a copy in a computer-readable form on (i) Portable flash drive (ii) Compact disc	R275.00
(i) For a transcription of visual images, for an A4-size page or part thereof (ii) For a copy of visual images	R260.00
(i) For a transcription of an audio record, for an A6-size page or part thereof (ii) For a copy of an audio record	R420.00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R150.00.

4. The access fees payable by a requester referred to in regulation 11(3) are guided as follows: (1) (a) For every photocopy of an A4-size page or part thereof R2.50 (b) For every print-equivalent copy of an A4-size page or part thereof R2.50 held on a computer or in electronic or machine-readable form (c) For a copy in a computer-readable form on - (i) portable flash drive R275.00 (ii) compact disc R275,00 (d) (i) For a transcription of visual images, R260.00 for an A4-size page or part thereof (ii) For a copy of visual images R260.00 (e) (i) For a transcription of an audio record, R420.00 for an A4-size page or part thereof (ii) For a copy of an audio record R420.00 (f) To search for and prepare the record for disclosure R335.00, for each hour or part of an hour, reasonably required for such search and preparation.
5. For purposes of section 54(2) of the Act, the following applies: (a) Six hours as the hours to be exceeded before a deposit is payable; and (b) one third of the access fee is payable as a deposit by the requester.
6. The actual postage is determinable and payable when a copy of a record is to be posted to a requestor.

Protection of Personal Information that is Processed by EDU360

1. Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party.
2. EDU360 and (the Responsible Party) needs Personal Information (PI) and Special Personal Information (SPI) relating to both individual and juristic persons to carry out its core functions.
3. The purpose of the information and the way it is obtained and processed is determined by the Responsible Party.

Personal Information of a Data Subject

1. PI and SPI are processed lawfully, fairly, and transparently.
2. Data Subjects are notified that their information is being collected in the format of Privacy or Data Collection Notices. EDU360 has a legal basis to collect and process information from Data Subjects, as detailed in the form providing consent.

3. The information:
 - a. Is processed only for the purpose for which it was collected.
 - b. Will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
 - c. Is adequate, relevant, and not excessive for the purposes for which it was collected.
 - d. Is accurate and kept up to date.
 - e. Will not be kept for longer than necessary.
 - f. Is processed in accordance with integrity and confidentiality principles which includes physical and organisational measures to protect the information.
 - g. Is processed in accordance with the rights of Data Subjects who have the right to:
 - i. Be notified that EDU360 Integrated Education is collecting their PI and/or SPI.
 - ii. Be notified in the event of a data breach.
 - iii. Access the information we hold on them and that requests will be handled in accordance with this PAIA Manual.
 - iv. Request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained PI and/or SPI.
 - v. Reasonably object to our use of their information and request that it be deleted, destroyed, or erased.
 - vi. Object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications.
 - vii. Complain to the Information Regulator regarding an alleged infringement of any of their rights according to PAIA and POPIA.

Purpose of the Processing of Personal Information and Special Personal Information

- 1. For consumers of our services, i.e., parents and guardians of children:**
 - a. Perform duties in terms of our Admissions and Service Agreements.
 - b. Operate and manage fee accounts of any applications, agreements and/or correspondence between parents, guardians and sponsors, and the EDU360 organisation.
 - c. Communicate, including direct marketing, by email, SMS, letter, telephone, face-to-face, or in any other reasonable format.
 - d. Carry out and participate in market research and business analysis activities.
 - e. Debt recovery.
 - f. Updating EDU360 information held.
 - g. Comply with EDU360 statutory, regulatory, legal, and other obligations under various Acts.
 - h. Perform any reasonably required activity related to general EDU360 administrative and operational functions.
 - i. To understand each child's family dynamic in order to support them and their parents in times of need.
- 2. For potential consumers:**
 - a. Verify information.
 - b. Check credit rating.
 - c. Direct marketing.
 - d. Any other reasonable purpose as reasonably required by EDU360's core business operations.
- 3. For students:**
 - a. To make, or assist in making, decisions about their care and education.
 - b. To form a view of each student as an individual and to identify and/or improve the service that is being provided according to their needs.
 - c. To identify areas of vulnerability in their health, immunity, mental and/or physical wellbeing.

- d. To monitor and evaluate a student's progress through a scaffolded curriculum.
- e. To be able to report their progress to parents and guardians from a knowledge base.

4. For employees:

- a. Perform duties in terms of our Employment Contract.
- b. Operate and manage any applications, agreements and/or correspondence between them and EDU360.
- c. Communicate by email, SMS, letter, telephone, face-to-face, or in any other form.
- d. Carry out business analysis.
- e. Updating information held.
- f. Comply with our statutory, regulatory, legal, and other obligations under various Acts.
- g. General matters relating to employees:
 - i. Pension.
 - ii. Medical aid.
 - iii. Payroll and statutory levies, i.e., PAYE, SITE and UIF.
 - iv. Disciplinary action.
 - v. Training.
- h. Perform any reasonably required purpose for:
 - i. Other administrative and operational functions.
 - ii. Relating to their employment.

5. For employment candidates:

- a. Verification of applicant employees' information during recruitment process.
- b. Statutory requirements, e.g., Police Clearance, SACE registration, etc.
- c. Relating to their possible employment relationship.

6. For vendors, suppliers, extra-curricular providers, and other businesses:

- a. Verifying information and performing checks.
- b. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties.
- c. Bank account details for the electronic payment of invoices.
- d. For account reconciliations.
- e. Complying with our regulatory and other obligations.
- f. Any other reasonably required purpose relating to our core services.

Categories of Data Subjects and Personal Information and Special Personal Information

Category: Consumers and Potential, i.e., Parents and Guardians of Children	
Personal Information	Special Personal Information
Billing information	ID number
Email address	Medical aid number and main member details
Emergency contact (if parent not available)	Occupation and place of employment
Full names	Passport number if not SA ID
Home and postal address	Payment agreements
Marital status, Custody agreement	Race or ethnic origin
Telephone numbers	

Category: Children	
Personal Information	Special Personal Information
Admission and discharge dates	Child’s medical history
Age	ID number
Allergies	Immunisation Records

Attendance Register	Birth certificate
COVID-19 Temperature screening register and other information	
Full name	
Date of birth	
Medications (currently being administered)	

Category: Employees and Employment Candidates	
Personal Information	Special Personal Information
Age	Any disabilities
Attendance Registers	Banking details
Date of birth	Details of payment to third parties
Email address	Disciplinary and grievance record
Emergency contact	Driver's license
Employment date	Employment contracts
Full name and title	Employment history
Gender	Identity number
General practitioners contact details	Medical aid reports
Home and postal addresses	Passport number (if no ID)
Language	References
Marital status	Remunerations/ salary records
Number of dependents	SACE registration and details
Qualifications	Tax registration, details, and records
Telephone numbers	UIF registration, details, and records
Training records	

Category: Vendors, Suppliers, Extra-curricular Providers and Other Business (which may include employees)	
Personal Information	Special Personal Information
Contact numbers	Bank account details
Director's information	Complaints
Email address	Employment history
Company information	Invoices, payments receipts, statements and reconciliations
Information about products or services	Recommendations and references
Other information not specified, reasonably required to be processed for business operations.	
Postal and/or street address	

Recipients of Personal Information

1. Any organisation or person that the EDU360 organisation uses to collect payments and recover debts, or to provide a service on its behalf.
2. Any payment system that we use.
3. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where we have a duty to share information.
4. Third parties to whom payments are made on behalf of employees.
5. Financial institutions from whom payments are received on behalf of data subjects.
6. Employees, contractors, professional associates and temporary staff.

Cross Border Transfers of Personal Information

Where EDU360 is obliged to send information to a country outside of the Republic which does not have sufficient data protection laws, EDU360 will apply for Prior Authorisation from relevant parties before taking action.

Objection to the Processing of Personal Information by a Data Subject

1. Data Subjects have the right, at any time, to object to the processing of their Personal Information and Special Personal Information in the prescribed manner subject to exceptions contained in this PAIA Manual and POPIA.
2. Please see Annexure A, attached to this manual, for Form 1.

Request for Correction or Deletion of Personal Information

1. Data Subjects have the right, at any time, to that their Personal Information and Special Personal be corrected, updated or deleted. Information in the prescribed manner subject to exceptions contained in this PAIA Manual and POPIA.
2. Please see Annexure B, attached to this manual, for Form 2.

Availability Of This PAIA Manual - Section 51(3)

1. This Manual is available for inspection at the offices of EDU360 free of charge.

Our offices are situated at:

Block E/F, Edenburg Terraces, 348 Rivonia Boulevard, Rivonia, 2128

Telephone number: 011 234 1212

Email address: cleona@edu360.education

2. The Manual is also available free of charge on our website:
www.edu360.education