



# PUBLIC PRIVACY NOTICE



**INSCAPE**

**PRIVACY NOTICE**

The INSCAPE EDUCATION GROUP privacy notice provides details of the personal information IEG collect from Data Subjects other than IEG employees.

**Data Subjects are listed as:**

Alumni  
Prospective Student  
Student  
Applicant  
Account Payer  
External Marker  
External Moderator  
Service Providers  
Registered Entities  
Tenants  
IP Partners  
Experiential Training Supervisors  
Registered Entities

**Parents/ Legal Guardians**

As an Education Provider, IEG interacts with minors. In order for minors (Children under 18 years old), to make use of our services IEG needs to use their personal information. In order to use the personal information IEG is required by law, to obtain the consent of the competent person who may be a parent or legal guardian. Before deciding on consent it is important for parents to understand IEG's information security and privacy policies. It is equally important for parents to explain to children, the implications of not providing IEG with the proper consent. A link to our consent form can be found wherever IEG collect personal information of minors.

IEG use Data Subject's personal information only for the purpose of which it is collected which is detailed in the tables below.

IEG have grouped the types of PI collected from the various Data Subjects and it is listed as follows:

**Types of Personal Information processed by IEG**

Name and Surname  
Tax Number  
Banking and Financial Details  
Physical Address  
Postal Address  
ID Number  
Curriculum Vitae (May contain unsolicited personal and special personal information)  
Qualification

**Types of Personal Information processed by IEG**

Signature  
 Date of Birth  
 Email Address  
 Contact Details  
 Fund Number  
 Designation  
 Employee Number  
 Signature  
 Full Academic Transcript  
 Portfolio of Evidence  
 Letter of good conduct  
 Previous school attended  
 Nationality  
 Student Number  
 Employment History  
 Gender  
 Company name, registration number and Vat number  
 General Practitioner contact details  
 Medical Aid Number  
 Next of Kin

**Special personal information could be about your health, your racial or ethnic origin, etc. and this includes the following:**

Ethnic Group  
 Gender  
 Disability  
 Health – Blood Group, Medical Conditions  
 Biometric Information

From **Alumni (Past students)** IEG collects, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b>            | <b>Lawful Basis</b>                | <b>Retention Period</b>                                     |
|--------------------------------------|------------------------------------|---|
| Request for duplicate of certificate | IEG have the Data Subjects consent | Indefinitely – until no longer needed for purposes of proof |

From a **Prospective Student** IEG collect, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b>                | <b>Lawful Basis</b>   | <b>Retention Period</b>                                     |
|--|---|---|
| Credit Accumulation and Transfer Request | IEG have the competent Persons or the Data Subjects consent | Until no longer needed for purposes of proof                |
| Campaigning/ Marketing                   | IEG have the competent Persons or the Data Subjects consent | Until contract is completed and/ or consent is withdrawn    |
| Student Intake                           | IEG have the competent Persons or the Data Subjects consent | Indefinite/until no longer needed for the purposes of proof |

From a **Student** IEG collects, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b>                                   | <b>Lawful Basis</b>  | <b>Retention Period</b>   |
|---|--|---|
| Credit Accumulation and Transfer Request                    | IEG have the competent Persons or the Data Subjects consent          | Indefinitely / Until no longer needed for the purposes of proof                       |
| Application for Financial Assistance                        | IEG have the competent Persons or the Data Subjects consent          | Until no longer needed for the purposes of proof                                      |
| Scholarship Programme                                       | IEG have the competent Persons or the Data Subjects consent          | Indefinitely / Until no longer needed for the purposes of proof                       |
| Deferment student academic year                             | IEG have the competent Persons or the Data Subjects consent          | Indefinitely / Until no longer needed for the purposes of proof                       |
| National Learner Database                                   | Statutory Requirement  | Indefinitely – until no longer needed for purposes of proof                           |
| Procuring Student Material                                  | To conclude or perform a contract to which the data subject is party | Until tax or other legal Retention period expires                                     |
| Proof of Delivery   | To conclude or perform a contract to which the data subject is party | Until tax or other legal Retention period expires                                     |
| Uploading of licenses on Student file and/or online systems | To conclude or perform a contract to which the data subject is party | CSV File is deleted by Procurement department on the system once everything is loaded |
| Plagiarism Agreement  | To conclude or perform a contract to which the data subject is party | 1 year  |
| Medical Indemnity   | To conclude or perform a contract to which the data subject is party | Indefinitely – until no longer needed for purposes of proof                           |
| Entry into Competitions/Awards                              | IEG have the competent Persons or the Data Subjects consent          | Until the service has ended   |

From an **Applicant** IEG collects, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b>     | <b>Lawful Basis</b>   | <b>Retention Period</b>   |
|-------------------------------|---|---|
| Scholarship Programme         | IEG have the competent Persons or the Data Subjects consent | Indefinitely / Until no longer needed for the purposes of proof |
| Student Enrolment             | IEG have the competent Persons or the Data Subjects consent | Indefinitely / Until no longer needed for the purposes of proof |
| Recognition of Prior Learning | IEG have the Data Subjects consent                          | Indefinitely / Until no longer needed for the purposes of proof |

From an **Account Payer** IEG collects, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b>      | <b>Lawful Basis</b>   | <b>Retention Period</b> |
|--------------------------------|---|-------------------------|
| Collecting Payment Information | IEG have the competent Persons or the Data Subjects consent | SARS – 5 years          |
| Registration of contract       | IEG have the competent                                      | Until no longer needed  |

|  |                                      |  |
|--|--------------------------------------|--|
|  | Persons or the Data Subjects consent | for the purposes of Data Subjects access |
|--|--------------------------------------|--|

From a **Lecturer** IEG collects, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b>   | <b>Lawful Basis</b>  | <b>Retention Period</b>                               |
|---|--|---|
| Staffing and remuneration   | To conclude or perform a contract to which the data subject is party | For tax and/or other legal Retention periods          |
| Submitting Lecturers info to the Council on Higher Education (CHE)                      | Statutory requirement  | Indefinitely/Until no longer for the purpose of proof |
| Accessing The South African Council for the Architecture Professions Information System | Statutory requirement  | Indefinitely/Until no longer for the purpose of proof |

From an **External Marker** IEG collects, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b>  | <b>Lawful Basis</b>  | <b>Retention Period</b>                               |
|--|--|---|
| Accessing The South African Council for the Architecture Profession information System | Statutory requirements   | Indefinitely/Until no longer for the purpose of proof |
| Processing of payments   | To conclude or perform a contract to which the data subject is party | Until tax and/or other legal Retention period expires |

From an **External Moderators** IEG collects, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b>  | <b>Lawful Basis</b>  | <b>Retention Period</b>                                |
|--|--|--|
| Accessing The South African Council for the Architecture Profession information System | Statutory requirements   | Indefinitely- Until no longer for the purpose of proof |
| Processing of payments   | To conclude or perform a contract to which the data subject is party | Until tax and/or other legal Retention period expires  |

From a **Service Provider** IEG collect, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| <b>Processing Purpose</b> | <b>Lawful Basis</b>  | <b>Retention Period</b>                           |
|---------------------------|--|---|
| Courseware Development    | To conclude or perform a contract to which the data subject is party | Until tax or other legal retention period expires |
| Consulting Services       | To conclude or perform a contract to which the data subject is party | Until tax or other legal retention period expires |

From a **Tenant** IEG collect, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| Processing Purpose | Lawful Basis   | Retention Period                                  |
|--------------------|--|---|
| Property Leasing   | To conclude or perform a contract to which the data subject is party | Until tax or other legal retention period expires |

From an **IP Partner** IEG collect, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| Processing Purpose   | Lawful Basis   | Retention Period                                  |
|----------------------|--|---|
| Business Development | To conclude or perform a contract to which the data subject is party | Until tax or other legal retention period expires |

From **Experiential Training Supervisors** IEG collects, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| Processing Purpose                               | Lawful Basis                       | Retention Period  |
|--|------------------------------------|---|
| Proof and assessment of of experiential training | IEG have the Data Subjects consent | Indefinitely – until no longer needed for purposes of proof |

From **Registered Entities** IEG collect, uses and retains personal information for the following purposes and periods, with the applicable lawful basis.

| Processing Purpose       | Lawful Basis   | Retention Period                                  |
|--------------------------|--|---|
| Mergers and Acquisitions | To conclude or perform a contract to which the data subject is party | Until tax or other legal retention period expires |
| Management of Students   | To conclude or perform a contract to which the data subject is party | Until tax or other legal retention period expires |

**The following type of personal information is collected from sources other than from the Data Subject:**

| Data Subject Type   | Personal Information Type                    | Indirect Source Name |
|---------------------|--|----------------------|
| Prospective Student | Name and Surname, Email Address, Cell Number | Approved Supplier    |

**Further Processing of Personal Information**

Should IEG intend to use the information for any other purpose, IEG will always inform you beforehand.

**Sharing of Personal Information**

IEG may be mandated to disclose your personal information in response to requests from a court, police services or other regulatory bodies. Where feasible, IEG will consult with you prior to making such disclosure and, in order to protect your privacy, IEG will ensure that only the minimum amount of your personal information necessary is shared.

**IEG shares personal information of Students** with the following approved suppliers (Responsible Parties), in the interest of providing sponsorship and/or bursaries and in order to provide effective IT

services, required for the Students to complete assignments, attend lectures and for communication purposes.

| <b>Data Subject</b>                                       | <b>Organisation Name</b>   | <b>Type</b>         | <b>Country</b> |
|---|--|---------------------|----------------|
| Students  | DBS – IT Services  | Responsible Party   | South Africa   |
| Students  | Belgotex – Sponsor   | Responsible Party   | South Africa   |
| Students  | Stratusolve – InConnect  | Responsible Party   | South Africa   |
| Students  | Medical Emergency Services   | Responsible Party   | South Africa   |
| Lecturers/External Moderators/External Markers/Developers | Council on Higher Education<br><br>South African Council of Architectural Professionals<br>Department of Higher Education and Training | Responsible Party   | South Africa   |
| Students  | Registered Entities hosting competitions   | Responsible Parties | South Africa   |

#### **Over Processing of Personal Information**

IEG limit the amount of personal information collected to only what is needed for the purposes as described above.

#### **Limited Access**

IEG restrict, secure and control all information assets against unauthorised access, damage, loss or destruction; whether physical or electronic.

#### **Retention of Records and Personal Information**

IEG retain personal information only for as long as is described in the Tables above.

#### **Research, Surveys and/or Statistics**

If IEG retain your personal information for historical or statistical purposes, IEG will ensure that the personal information cannot be used further and where required, your consent will be requested.

#### **Accuracy of Personal Information**

While in IEG's possession, together with your assistance, IEG strive to maintain the accuracy of your personal information.

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

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

**Portability of Personal Information**

Where you have previously given your consent to process your personal information, you also have the right to request that IEG transmit your personal information to another Responsible Party.

**Right of the Data Subject to Object**

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. Should you withdraw your consent, IEG will explain the consequences to you as it may affect the continued provision of IEG's services to you. If you withdraw your consent, IEG will cease using your personal information without affecting the lawfulness of processing based on the consent before your withdrawal.

**Our Organisation**

Organisation email: paul.mowat@inscape.co.za

Our Information Officer: Mrs Helen Bührs

Our Deputy Information Officer: Mr Paul Mowat

**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 2017 The Information Regulator (South Africa) POPIAComplaints@infoeregulator.org.za +27827464173 infoereg@justice.gov.za