

SABJE PRIVACY POLICY

(September 2025 / Version 2.0)

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

Introduction

Welcome to our privacy policy. We are the South African Board of Jewish Education (SABJE) Reg no. NPO 004-091 PBO (reg no. 930004086) 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 we (including any school that operates under our umbrella) 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**).

We process personal information in accordance with the **Protection of Personal Information Act, 2013 ("POPIA")**, and other applicable laws.

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

Audience

This policy applies to you if you are:

- a visitor to our website;
- a current or past student or parent of any school under SABJE umbrella;
- a potential student or parent who has requested the services we provide
- a donor, sponsor and other benefactor;
- members of school governing bodies, trustees, directors, committee members and other office bearers;
- suppliers, service providers, contractors, consultants and their personnel;



- visitors to any school, campus, facility, event or online platform controlled by SABJE;
- persons captured on CCTV or other surveillance systems located on premises controlled by SABJE;
- users of the SABJE websites, portals, applications or social-media pages; and
- third parties with whom SABJE and the schools correspond in the ordinary course of business.

This policy applies to you under certain circumstances.

Personal Information

Personal information includes:

- Certain information that we collect automatically when you visit our website;
- Certain information collected on registration (see below);
- Certain information collected on submission;
- Certain information collected during the course of our relationship with you; and
- Optional information that you provide to us voluntarily (see below);

But excludes:

- Permanently de-identified information that does not relate or cannot be traced back to you specifically; and
- Non-personal statistical information collected and compiled by us.

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

Categories of personal information

SABJE and our schools may collect, generate, receive or otherwise process various types of personal information relating to the following:



- **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 residential or postal address;
- **Demographic information** – such as your gender or marital status;
- **Admission and academic records** – such as admission records, enrolment forms, contractual undertakings, academic records, co-curricular records, disciplinary records, attendance records;
- **Student support** – such as student support notes, behavioural-assessment notes;
- **Contractual and procurement information** – such as company or trust registration details, VAT numbers, B-BBEE certificates, supplier-onboarding information;
- **Communications and interaction data** – such as communications metadata, correspondence, call recordings, interaction logs;
- **Technical and online identification data** – such as device identifiers, IP addresses, cookies, geolocation information, browsing or usage analytics; and
- **Legal and compliance documentation** – such as any documentation or data SABJE is required or entitled to process in terms of applicable law, court order, or legitimate educational, administrative, or safeguarding practice.

Sensitive personal information

Depending on what you require, we may also collect sensitive personal information including your:

- **Financial information**- such as your bank account details, payment histories, fee statements, bursary or scholarship data, tax-certificate information, donor-contribution records;
- **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 related legal proceedings;
- **Employment information** – including your membership of a trade union; and
- **Beliefs** – including your political or religious beliefs.



Disclosure of Personal Information

In most circumstances providing your personal information is generally voluntary. However, certain information is mandatory for us to provide educational services, comply with legal obligations, or fulfil contractual requirements.

Consequences of Non-Disclosure

If you do not provide the required personal information, we may not be able to process your application, provide educational services, or comply with legal obligations.

We process various categories of your personal information in order to provide our services to you. You are responsible for ensuring that you read and understand this privacy policy, or where you are a child (under the age of 18), that your parent or guardian has explained the contents of this policy to you and has accepted its contents on your behalf.

If you provide us with personal information of another data subject, you warrant that you are authorized to do so and have brought the contents of this privacy policy to their attention.

Changes

We may change the terms of this policy at any time. If you continue to use the website or our services following a change to the terms, the changed terms will apply to you.

Collection

SABJE and our schools collect personal information both directly from you and indirectly from other sources, as permitted by law.

Direct collection typically occurs when you provide information through application forms, registration documents, correspondence, online portals, or during interactions with SABJE or our schools.

Indirect collection may occur from third parties such as previous educational institutions, other schools within the SABJE umbrella of schools, service providers, public records, regulatory authorities, or other parties acting on your behalf (for example, parents or legal guardians providing information about students).



In certain cases, information may also be collected from surveillance systems, access-control systems, or through the use of SABJE's digital platforms (for example, 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, versions 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 on registration, when you register on our website.
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Recipients of Personal Information

SABJE and our schools may disclose your personal information to third parties where necessary for the purposes described above, where required or permitted by law. Categories of third-party recipients may include:

- Government departments, regulatory authorities, and statutory bodies (such as the Department of Basic Education, the South African Revenue Service, or the Department of Health);
- Other schools or entities within the SABJE group, where necessary for administrative, educational, safeguarding, or operational purposes;
- Service providers and contractors who assist with educational, administrative, IT, security, or support services (for example, IT support vendors, payment processors, transport providers, or catering companies);
- Professional advisors, auditors, insurers, and legal representatives;
- Other educational institutions, examination boards, or scholarship and bursary providers (for example, when transferring a student or verifying academic records);



- Security and emergency services, including medical personnel and law enforcement, where necessary for safety or compliance;
- Donors, sponsors, and alumni associations, for purposes of fundraising, events, or community engagement (subject to appropriate safeguards); and
- Any other third party where disclosure is required by law, court order, or is necessary to protect the rights, property, or safety of SABJE, its schools, learners, staff, or the broader community.

All disclosures are made subject to appropriate confidentiality and data protection safeguards, and SABJE takes reasonable steps to ensure that third parties process personal information in accordance with applicable legal requirements.

Cross-Border Transfers

We and our schools are based in and operate from South Africa. We may transfer your personal information to an agent, subcontractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the similar level of protection as if we were dealing with it. Also, your personal information will only be transferred to and stored in country where the third-party recipient is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.

Cookies

Cookie Notice

Our online platform and mobile app use cookies. Insofar as those cookies are not strictly necessary for the provision of our online platform, mobile app (Edana / parent portal) and services, we will ask you to consent to our use of cookies when you first visit our online platform or install and open our mobile app.



About 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 do contain a personal identifier allowing us to associate your personal information with a certain device. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. 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; and
- helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

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 personalized experience.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie on the other hand, will expire at the end of the user session, when the web browser is closed.



Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies

Why we use Cookies

We use cookies for the following purposes:

- Authentication – we use cookies to identify you when you visit our online platform and as you navigate our online platform;
- Status – we use cookies to help us to determine if you are logged into our online platform;
- Personalisation – we use cookies to store information about your preferences and to personalize our online platform for you;
- Analysis – we use cookies to help us to analyse the use and performance of our online platform and services;
- Accuracy – we use cookies to help us ensure our records are complete and up to date.

The information which we may passively collect from your device may include your identifying information, contact details, device and device event information, site activity information, log information, telephone log information, location information, unique application numbers and any other information which you may permit us, from time to time, to passively collect from your device.

The names of these cookies change from time to time and sometimes session to session. If you have a query about a specific cookie, please contact us with the name and value of the cookie so that we can identify its purpose.



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.

Cookies used by our Service Providers

Our service providers use cookies, and those cookies may be stored on your computer when you visit our online platform.

The names of these cookies change from time to time and sometimes from session to session. If you have a query about a specific cookie, please contact us with the name and value of the cookie so that we can identify its purpose.

Any questions? Please contact us by using the details at the end of this policy.

Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.

Web beacons

Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.



Your Rights

You have the right to:

- request access to the personal information we hold about you. For more information about how to exercise this right, you can view our PAIA Manual by clicking here: <https://kingdavid.org.za/school-policies/>;
- request correction of the personal information you provided to us by email. Please ensure that the information we hold about you is complete, accurate and up to date;
- object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our or a third party's legitimate interests or your legitimate interests, unless the law provides for such processing;
- withdraw your consent to the processing of your personal information at any time, where processing is based on your consent;
- in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us; and
- lodge a complaint with the Information Regulator if you believe your personal information has been unlawfully processed.

Complaints

Should you believe that we have used your personal information contrary to applicable laws, we would appreciate it if you could first attempt to resolve any concerns with us.

If you are not satisfied with such process, you have the right to lodge a complaint with the applicable data protection authority. In South Africa, the details of the Information Regulator are listed below:



KING DAVID SCHOOLS
www.kingdavid.org.za

E-mail address

POPIAComplaints@inforegulator.org.za

Physical address

Woodmean North Office Park
54 Maxwell Drive
Woodmead,
Johannesburg, 2191

Contact and Enquiries

SABJE is a non-profit organisation registered under 930004086 according to the laws of the Republic of South Africa, with its primary place of business at 100 Club St, Linksfield, Johannesburg. The details of the schools falling under our umbrella are listed:

- King David High School Linksfield
- King David Primary School Linksfield
- King David Pre-Primary School Linksfield
- King David Ariel
- King David Primary School Sandton
- King David Rosabelle Klein Nursery School Waverley
- Minnie Bersohn Pre-Primary School

SABJE and the schools under our umbrella are the “Responsible Party” (as defined under POPIA) in respect of the personal information described in this policy. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this policy.

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact our Information Officer Anthony Glazer on glazeran@sabje.co.za.