

PRIVACY POLICY

Learndirect Training Solutions (Pty) Ltd ("**learndirect**") is deemed to be a responsible party in terms of the Protection of Personal Information Act 4 of 2013, as amended, consolidated or re-enacted from time to time, and includes all schedules and regulations thereto ("**the POPI Act**"), and learndirect is obliged to comply with the provisions of the POPI Act.

This Privacy Policy sets forth our policy with respect to the information, including personally identifiable information ("**Personal Information**"), which is collected from users ("**the User**", "**you**" or "**your**"). Personal Information may include any of the following –

- a) information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of a person;
- b) information relating to the education or the medical financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views of preferences of the person;
- f) correspondence sent by a person that is implicitly or explicitly of a private or confidential nature of further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about a person; and
- h) the name of a person if it appears with other personal information relating to a person or if the disclosure of the name itself would reveal information about the person.

learndirect recognizes and respects the importance of maintaining the privacy of your Personal Information and established this Privacy Policy as a result. Please read this Privacy Policy carefully as it includes important information regarding your Personal Information.

This Privacy Policy is incorporated into our Website Terms and Conditions and governs your use of the Website and/or any transactions concluded with learndirect. The Terms and Conditions can be found be on our Website.

If you have any questions or concerns, please do not hesitate to contact us at the “Company Information” as provided below.

THE INFORMATION WE COLLECT

- **Personal Information**

You do not have to give us personally identifiable information (“**Personal Information**”) in order to visit our Website. If, however, you become registered user on the Website, you will be required to supply us with information, including but not limited to, your name, surname, email, phone number and/or physical address. If we collect Personal Information from you, you are giving us permission to use that information for the specific purpose as set out in our Terms and Conditions for which it is provided.

- **Non-Personal Information**

When you interact with the Website, we automatically collect certain personally non-identifiable information (“**Non-Personal Information**”). The Non-Personal Information we collect includes without limitation, your Internet Protocol (“**IP**”) address, domain name of your internet service provider, your approximate geographic location, a record of the Site pages that you visit, the time of your visits and aggregated Personal Information that cannot be used to specifically identify you. Such information, which is collected passively using various technologies is strictly for statistical purposes and to determine the visitor traffic patterns through the Website and cannot, in and of itself, be used to specifically identify you.

- **Cookies**

In operating the Website, we use a technology called “**Cookies**.” Cookies are small text files that provide Non-Personal Information to us regarding the visitors to our Website. Our Cookies provide additional functionality to the Website and assists in personalising your online experience. It further helps us analyse the Website usage more accurately

and allows us to gauge the areas that are of the most interest to our visitors. None of our cookies contain any of your personally identifiable information.

Because you are using our Website assume that you are happy for us to use cookies in this way. If you are not happy, then you should either not use the Website or set your web browser to not accept cookies from learndirect or use your web browser's anonymous browsing setting (this is called 'Incognito' in Google Chrome, 'InPrivate' in Internet Explorer and 'Private Browsing' in Firefox).

Because our learning systems rely on cookies to deliver your courses effectively you give us consent to use cookies as outlined below when you purchase a learndirect course. **We will not provide technical support to learners who choose to block learndirect cookies and then encounter issues with their learning.**

You will not be able to purchase courses from the Website if you set your browser to not accept cookies as our ecommerce system uses them to process transactions. We are unable to facilitate purchases by any other method (e.g. telephone sales) or provide technical support to users who choose to block learndirect cookies.

learndirect uses the following cookies:

learndirect Session Cookies

We use a number of session cookies to provide functionality including, but not limited to, remembering who you are when you have logged into our website(s) or learning systems, to identify you when you move from one learndirect system to another, to greet you by name on screen, to optimise the effectiveness of our web servers and to remember the items you have put into our shopping basket. We consider these cookies to be strictly necessary for the secure and efficient operation of our website(s) and learning systems and make your experience of using them easier and quicker. If these cookies are blocked or disabled then much of the functionality of our systems will be broken.

learndirect Persistent Cookies

We use a number of persistent cookies to provide functionality including, but not limited to, returning you back to the point in your learning you had reached the last

time you logged out, to show you content you had looked at on a previous visit to make it easier to find it again, to make sure you are only invited to complete a web survey occasionally and that you don't see alerts or messages repeatedly during a single web visit.

If these cookies are blocked or disabled then our systems will still be usable, but the user experience will be severely degraded.

Google Analytics

We use Google Analytics to understand how our website(s) and learning systems are being used in order to improve the user experience. We only record anonymous user data; we can't identify what an individual user does on our website. For more information on how Google protects your data see Safeguarding your data content. To permanently opt-out of Google Analytics for the web visit the Google Analytics opt-out page and install the add-on for your browser.

DoubleClick (Google)

This cookie is used on a small number of pages on the learndirect website to track the effectiveness of our Google Adwords and Google Sponsored Link advertising.

BrowserHawk (cyScape)

Each time you start a course or use our 'Test my PC' tool we use BrowserHawk software to check the set-up of your computer. This information is stored in a cookie so that we don't test your system multiple times in a single visit and is also used to display the results of the test and allow us to give you help and support specific to the set-up of your computer.

Social network cookies

Some pages on our website(s) contain social network 'share' or 'like' buttons. The social network may set a cookie (or cookies) on your PC when you click on one of these buttons. In order to implement these buttons on our website(s) we use code which is hosted by the relevant social network. If you are a member of some of these

networks they may use this code to track that you have visited our website(s) whether you click the buttons or not.

learndirect does not control these cookies or the underlying code. You should check the privacy statement of the relevant social network before clicking them and/or to find out how they track their members' behaviour using these elements and how to opt out of this functionality.

- **Aggregated Personal Information**

In an on-going effort to better understand and serve the users of the Website, learndirect often conducts researches on its customer demographics, interests and behaviour based on Personal Information and other information that it collects. This research may be compiled and analysed on an aggregate basis and this aggregate information is strictly for statistical purposes and does not identify you personally and therefore is considered and treated as Non-Personal Information under this Privacy Policy.

OUR DISCLOSURE OF INFORMATION THAT WE COLLECT

learndirect is not in the business of selling or supplying your Personal Information to any third parties. We consider this information to be required to enable us to provide the services offered to the Users. There are, however, certain circumstances in which we may disclose, transfer or share your Personal Information with certain third parties without your consent, as set forth below:

- **Business Transfers**

In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Information may be part of the transferred assets. We may also share your Personal Information with our subsidiaries and/or affiliates for purposes consistent with this Privacy Policy and legislation regulating the use of personal information. Our subsidiaries and affiliates will be bound to maintain that Personal Information in accordance with this Privacy Policy.

- **Agents, Consultants and Related Third Parties**

learndirect sometimes engages other companies to perform certain administrative and/or business-related functions which, *inter alia*, include maintaining the database and communications network and processing and facilitating payments. When we engage another company to perform such functions, we may provide them with information, including your Personal Information, in connection with their performance of such functions.

- **Legal Requirements**

learndirect may disclose your Personal Information if required to do so by law or in the good faith belief that such action is necessary (i) to comply with a legal obligation, (ii) to protect and defend the rights or property of learndirect, or (iii) to protect learndirect against legal liability.

- **Non-Personal Information**

As Non-Personal Information cannot be used to personally identify you, learndirect may disclose, transfer or share Non-Personal Information for any lawful purpose.

HOW TO PROTECT THE INFORMATION WE COLLECT

learndirect has put in place certain measures to ensure the security of the Personal Information we collect and to secure the correct use thereof. These measures are appropriate to the nature of the information provided to us and prevent unauthorised access. We take reasonable steps to ensure the reliability of our own staff and ensure that any person who processes information on our behalf reaches the same high standards that we set ourselves and limit their access to your Personal Information to what is necessary in order for them to perform their responsibilities. Our security measures include the use of software firewalls, encryption and intrusion detection systems. We store all transaction information on secure computers located in locked data centres to which only selected employees have access. We will ask for your express permission before we use your Personal Information for any purpose not disclosed above.

learndirect takes what it believes to be reasonable steps to protect the Personal Information provided via the Website from loss, misuse, unauthorized access, inadvertent disclosure, alteration, and destruction. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we

cannot guarantee the security of your data transmitted to our Website and any such transmission is at your own risk.

REQUEST FOR ACCESS FOR PERSONAL INFORMATION

The User shall, having provided adequate proof of his/her identity, be entitled to –

- submit a request in writing to learndirect to confirm, free of charge, whether or not learndirect holds Personal Information about such User; and
- request from learndirect the record or a description of the Personal Information about the User held by learndirect, including Personal Information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information at a reasonable fee charged by learndirect within a reasonable time from the date of receipt of such request.

PRIVACY LAWS

Use of the Website and any electronic transaction concluded with learndirect are governed by the laws of the Republic of South Africa. If the User accesses this Website from locations outside of the Republic of South Africa, that User is responsible for compliance with all local laws.

CHANGES TO PRIVACY POLICY

The Website and/or any other information displayed on the Website may change from time to time. As a result, at times it may be necessary for learndirect to make changes to the Website and this Privacy Policy. learndirect reserves the right to update or modify its Website and this Privacy Policy at any time and without prior notice to you. We will request your consent should any update or modification of the Website or Privacy adversely affect your rights set out herein.

Please review this Privacy Policy periodically and especially before you provide any Personal Information to us. Your continued use of the Website, after any changes or revisions thereto or to this Privacy Policy, shall indicate your agreement with the terms of such revised Privacy Policy.

HYPERLINKS

Our Website may contain links to and from the websites of our advertisers and/or affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please familiarise yourself with these policies before you submit any Personal Information to these websites.

CONTACT US

Please feel free to contact us if you have any queries regarding learndirect' Privacy Policy. We confirm our contact details are as follows:

- by telephone on 021 200 8877 during 9am to 5pm on Monday to Friday
- by email at support@learndirect.co.za and
- by post at learndirect, 200 Main Road, Claremont, Cape Town, 7708.