

WHO WE ARE

Arrow Academy (Pty) Ltd together with its affiliates (collectively "Optimi" or "we" or "us" or "our") form part of the Optimi Group under Optimi Holdings (Pty) Ltd. We provide various innovative educational solutions as well as related products and services.

PURPOSE

The purpose of this policy ("Privacy Policy") is to explain who we are, what personal information we collect, how we use and protect such information, with whom we share such information and what your rights are with regard to the personal information.

To the fullest extent possible, this Privacy Policy applies to all jurisdictions where we do business.

You should read this Privacy Policy together with any other privacy statement or other notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements any other statements or notices and is not intended to override them.

OUR COMMITMENT TO PRIVACY

We value and respect your right to privacy and the trust you place in us by giving us your (and/or your minor dependents) personal information. We strive to adhere to the provisions of the Protection of Personal Information Act ("POPI") the at all times.

Should you have any concerns as to the manner in which your personal information is being used, we will assist you in efficiently resolving such concerns.

WHAT PERSONAL INFORMATION DO WE COLLECT?

This Privacy Policy relates to your personal information we may collect and process, by way of:

- Your general use of the websites, apps, online-platforms, software and/or computer programs owned or controlled by us, or provided by a third party on our behalf ("Platform"); and/or
- Your commercial relationship with us; and/or
- Your communications with us.

Some of our Platforms are aimed at children under the age of 18, therefore, we collect and use personal information of children which has been provided to us by:

- Their parent/legal guardian; and/or
- The child when using our Platform under the consent of their parent/legal guardian.

By agreeing to this Privacy Policy, you represent that you are at least the age of majority, or that you are the age of majority and you have given us your consent to the collect and processing of your minor dependent's personal information in accordance with this Privacy Policy. In the event we discover we have collected information from a child in a manner inconsistent with POPI, we will either delete the information or immediately seek the consent of the parent/legal guardian. In this Privacy Policy, reference to "you" includes your minor dependent and reference to "personal information" means information that could identify you and/or your minor dependents.

We may collect and process the following information (which may include personal information) about you and/or your minor dependent:

- Information that you provide by filling in forms on a Platform. This includes information provided at the time of your registering to use a Platform, subscribing to or accessing our products and/or services, posting material or requesting further services.
- Information that we may ask of you when you report a problem with our Platform, products and/or services.
- Information that relates to records of correspondence between us.
- Information from reviews or surveys that you choose to complete for us that we use for research purposes.
- Details of transactions you carry out via our Platforms.
- Details of your visits to our Platforms (including traffic data, interactions, location data, and weblog and other communication data, whether they be required for our own billing purposes or otherwise) and the resources that you access;
- Details provided by you of students, learners or staff, which you agree we may process on your behalf to facilitate the delivery of services through the use of one of our platforms or applications.
- Account Holder's Information: title, full names, surname, gender, contact details including physical and postal address, identity number, copy of identity document and bank account details (if paying via debit order).
- Parent/Legal Guardian's Information: title, full names, surname, gender, contact details including e-mail address, physical and postal address, identity number.
- Your Minor Dependent's Information: title, full names, surname, gender, contact details including e-mail address, physical and postal address, identity number, copy of identity document or birth certificate, race (we may require the child's race for statistical purposes), student number (if you were previously registered with us), historic report cards, academic records and subject choices.

HOW DO WE COLLECT YOUR INFORMATION?

The personal information that we collect and use may be provided to us in one or more of the instances stated below (this list is not exhaustive):

- On the registration forms you submit to us regarding our Platforms, products and/or services;
- Through correspondence with us via e-mail, fax, telephone, post and our Platforms as well as social media;
- When visiting our Platforms;
- When a third party delivers services to its clients using our platforms
- When a third party requests us to deliver services to its clients or partners on its behalf
- At social events;
- Via any other third parties;
- During visits to our offices;
- Via social media;
- Through our marketing services.

In most cases we explicitly request your consent to use your personal information, however, in some cases we may infer consent from your actions and/or behaviour, or may act on instruction of a third party who you have provided consent to. In the instance where we act on instruction of a third party, we abide by all restrictions and confidentiality obligations stipulated by that party, and that party may be requested to provide you with details of such restrictions.

Collecting information when you Register:

- We collect and use the personal information you provide when complete and submit any registration or application form regarding our Platform, products and/or services.

Collecting information when you Communicate with us:

- We collect and use the personal information you provide when you communicate with us via social media, e-mail, fax, telephone, post and our Platforms.

Collecting information when you make use of our Platforms:

- We may use Cookies to manage your sessions and to store preferences, tracking information, and language selection. Cookies may be used whether you register with us or not. Cookies are small text files transferred by a web server to your hard drive and thereafter stored on your computer. The types of information a Cookie collects include the date and time of your visits to a Platform, your browsing history on a Platform, your preferences, and your username.

- You have the ability to accept or decline the use of Cookies on the device accessing our Platforms. However, declining the use of Cookies may limit your access to certain features of our Platforms.
- We use cookies and other tools (such as web analytics tools and pixel tags) to automatically collect information when visiting our Platforms. The type of information we collect includes information about the type of browser you use, your IP address and the hyperlinks you have clicked on. We gather such information for statistical and research purposes. This information does not identify an individual specifically and is not used to that end.
- We use comments and testimonials posted on our Platforms to improve our products and/or services.
- You are requested to continuously update your personal and contact details and your minor dependent's details to enable us to improve the delivery of our products and services to you.
- We may use Cookies to manage your sessions and to store preferences and tracking information. Cookies may be used whether you registered of the Platform or not. Cookies are small text files transferred by a web server to your hard drive and thereafter stored on your computer. The types of information a Cookie collects include the date and time of your visits to a Platform, your browsing history on a Platform, your preferences, and your username.

Collecting information when you make use of our Platforms where we are a Third Party solutions provider:

- The information collected by the Platform is provided by the source information provider (Second Party) and we cannot guarantee the security of information that is sent to us by the information provider. The information provider is responsible for using secure methods when sending confidential information to the Platform.
- In the event that the Second Party autonomously administrates users and controls access to personal information on platforms we provide, it shall assume all responsibility for compliance with any data protection legislation and confidentiality obligations.

Collecting information at Social Events:

- Should we take photos at social events, these photos may be uploaded by our marketing team to our Platforms. By your participation in the social event you consent to your photo being taken and to the fact that these photos could be uploaded to our Platforms. If you DO NOT wish to have photos of you or your minor dependent appear on our Platforms, you must inform us in writing, at info@optimi.co.za.

Collecting information via Third Parties:

- We may collect your and/or your minor dependent's personal information provided by third parties, as directed or instructed by you to that party. We will never exceed the mandate and purpose provided by the third party relating to the processing of your personal information.

Collecting information via Third Party Websites:

- Our Platform may have links to other websites or you may be referred to our Platforms through a link from another website. We have no control over the content or data collection practices of these third party websites. We encourage you to read their Privacy Policy terms and conditions before using such third party websites and disclosing personal information about you or anyone else, as we will not be held liable for personal information collected on these third party websites.
- Certain third parties have websites with links to/from our Platforms. These third parties are separate and distinct from us and are responsible for their own content management and collection of personal information.
- In some instances, our third-party service providers may use Cookies on the Platform. We cannot control or access Cookies used by third-party service providers. This Privacy Policy covers only Cookies used by us but not any Cookies used by third parties.

Collecting information when visiting our Offices:

- Upon arrival at any of our sites, you may be required to log your name, identity number and vehicle registration number in our visitor book. This information is used for security and access control purposes only.

Collection information via Social Media:

- We may gather your and/or your minor dependent's personal information once you submit an enquiry or comment on our Platforms, or any social media platform, or when you submit an inbox message. This information is used to assist us in resolving your query or responding to your comment.

Collecting information via our Marketing Services:

- We follow up with clients who were previously registered with us to gather information as to why they are no longer registered with us. This information is strictly used for statistical purposes and all clients have the option to opt out of this or refrain from answering any of our questions.

WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

We may use the information (including personal information) we hold about you and/or your minor dependent in the following ways:

- To identify your minor dependent to effect the registration process;
- To open your account with us;
- To provide you with information, products or services that you request from us or which we feel may interest you, when you have consented to be contacted for such purposes
- To keep record of information associated to the products and/or services for which you have registered;
- To respond to your queries, comments and complaints;

- To ensure that content from our Platforms is presented in the most effective manner for you and for the device you use to access a Platform
- To allow you to participate in interactive features of our products and/or services when you choose to do so
- To carry out and enforce any contracts that may form between us
- To notify you about changes to our products and/or services;
- To send promotional information and announcements.

WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

To enable us to deliver our products and/or services to you, your information is shared with our employees as well as third parties that assist us in delivering our products and services to you.

Third parties that we share information with on a regular basis include:

- Schools, learning centres, tutors, academic assessment service providers and other services providers that you have linked to our products and/or services and where such third party needs a record of the clients and/or children registered with us and, as such, are entitled to our products and/or services.
- Suppliers and contractors who assist us in providing our services and products
- Warehousing, delivery or courier services that enable us to deliver our products and/or services to you.
- Service providers who assist us in maintaining our IT infrastructure.
- Consultants and advisors including, but not limited to, legal advisors, business consultants, financial advisors and auditors specifically appointed by us to render professional services in respect of our business.
- Regulatory bodies and agencies to which we are required to provide information.
- Our shareholders and stakeholders.
- Third parties that we share personal information with on an ad hoc basis:

In some instances we may need to share your personal information with a third party to comply with a legal requirement, for example:

- Law enforcement or government authorities – where there is a legal requirement to disclose the information;
- Examination board – personal information of your minor dependent may be shared with the relevant examination board for those learners who enter the Further Education and Training Phase.

Should we share your personal information with a third party, such information is limited to the agreement between us and the third party. We use commercially reasonable efforts to ensure that your personal information is kept confidential and secure by such third parties.

We do not sell your personal information. However, should we enter into a sale or business agreement, merger, consolidation, a change in control of our business, reorganisation or liquidation of all or a portion of our business, the purchaser will be bound to the same terms and conditions that apply to us in respect of your and/or your minor dependent's personal information, unless otherwise advised.

SENDING PERSONAL INFORMATION OUTSIDE OF SOUTH AFRICA

We may transfer your personal information outside of South Africa. If your personal information is to be transferred outside of South Africa, we shall insure compliance with the Chapter 9 provisions of POPI.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

The personal information that you provide will be retained, in a secure manner, for as long as is required to achieve the purpose for which it was collected. Without limiting the generality of the above:

- Personal information, registration information, assessment and curriculum information and all financial information will be kept for the duration of your relationship with us, and for a period of five years after termination thereof, or as long as stipulated in any statute or law.

HOW DO WE KEEP YOUR PERSONAL INFORMATION CONFIDENTIAL AND SECURE?

We take all commercially reasonable measures to ensure the confidentiality and integrity of your personal information, and we require any third party that handles your personal information on our behalf to do the same. These measures include the following:

- We have appointed a group Information officer, and deputy Information officers to ensure that compliance in relation to data security and privacy legislation is actively monitored assessed for risks;
- We conduct regular risk assessments to ensure that we are aware of any physical and/or technological risks to your personal information. We believe that our technical and organisational measures are appropriate to address these risks;
- We restrict access to your personal information to authorised employees and third parties;
- We require third parties to undertake confidentiality and data protection obligations prior to providing them with any personal information.
- We use encryption when transmitting confidential, personal information; and
- We implement regular employee training sessions to ensure compliance of our personal in relation to information security and privacy policies and procedures.

We cannot guarantee the security of information that is sent to us. You are responsible for using secure methods when sending confidential information to us.

Optimi only collects personal information when you provide such information voluntarily. The collected personal information is stored in databases to which access is strictly controlled and is made available only to those who need to have access to such information in the course of their duties.

The personal information you submit when you register on our Platforms may be protected by a unique customer password and user ID. You should not disclose your password information to anyone and always remember to log off after each session.

We have taken certain security precautions to safeguard your personal information. However, as with most electronic transactions, no method is impervious to attack. While we strive to use commercially acceptable means to protect the personal information you provide, we cannot guarantee its security. Therefore, you acknowledge and agree that we assume no liability regarding the theft, loss, alteration or misuse of personal or other information or content, including, without limitation, such information as has been provided to third parties or other users, or regarding the failure of a third party to abide by the agreement between us and such third party.

MARKETING OF OUR PRODUCTS OR SERVICES

We may contact you regarding our products and services as well as events which may be of interest to you, provided that you have given us consent to do so, or you have previously requested a similar product or service from us, or made an enquiry in respect of another product or service in group offering. You may request us to stop ("opt-out") sending you such communication at any time. Any direct marketing communication that we send to you will provide you with the information and means necessary to opt out of receiving such information in future.

KEEPING YOUR DATA UP TO DATE AND ACCURATE

It is important that we have up-to-date and accurate records of your personal information. You may update your information by contacting the relevant department and answering the necessary security questions and/or following the required procedures put in place from time to time to effect the change of your information.

YOUR RIGHTS AND WHO TO CONTACT

You have the right to:

- Know what personal information we have about you (or your minor dependent);
- Request that we correct or update your personal information on our records;
- Report any misuse of your personal information.

In the event that you wish to revoke any consent pertaining to your personal information and you would like us to remove and/or delete your personal information entirely, you may contact us telephonically or notify us in writing. Revoking consent to use and collect certain information may prevent us from providing or rendering our products or services to you or your minor dependent.

We can be contacted in the following ways:

Submit a query online, clearly setting out your concern or request to: POPIA@Arrowacademy.co.za. To assist us in dealing with your request, please provide us with the full name and student number of your minor dependent, or the full name of the account holder. To guard against fraudulent requests, we may require further information to verify your identity and the authenticity of the request.

We will endeavour to respond to your request or provide the information you have requested, within a reasonable time. We may charge an appropriate fee for the cost of fulfilling your request (e.g. photocopying and postage) to the extent permitted by the applicable law.

If you do not agree to this Privacy Policy, you may not access or otherwise use the Platforms.

CHANGES TO THIS POLICY

We may change this Privacy Policy from time to time by posting an updated version thereof on our Platforms.

CONSENT

By agreeing to this Privacy Policy, you represent that you are at least the age of majority, or that you are the age of majority and you have given us your consent to allow any of your minor dependent to use our Platforms.

By using our Platform or registering with us as a client, you consent to the collection, storage and use of the personal information you provide in accordance with this Privacy Policy and you consent to our collection of any changes or updates that you may provide to any personal information you provided that has been collected by us. Such consent includes our right to collect, store and use the personal information you provide in respect of your minor dependent. In this regard, you warrant that you are legally competent to consent to any action or decision being taken in respect of any matter concerning the child.