

**THE SHARKS ACADEMY (PTY) LIMITED**  
**THE PROTECTION OF PERSONAL INFORMATION ACT**  
**PRIVACY NOTICE**

**Overview**

‘This Privacy Notice applies to any person who voluntarily provides information to the Sharks Academy which includes but is not limited to players, students, academic service providers, parents of students or a guest and explains in detail the types of personal data we may collect about you when you interact with us. It also explains how that data will be stored, handled, and kept safe.

We have provided you with a substantial amount of information in this notice, but we want you to be fully informed about your rights, and how The Sharks Academy uses your data; for example, we will explain how we analyse and combine all the data we hold about you to ensure that your data is only kept for legitimate and relevant reasons.

We hope the following sections will answer any questions you have but if not, please do not hesitate to get in touch with us.

**Privacy Policy**

This Privacy Policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how data will be stored, handled, and kept safe. Please read this privacy policy carefully to understand our views and practices regarding your personal information and how we will treat it.

**What is personal information?**

Personal information refers to information about an identifiable person, such as your name and surname, gender, age, date of birth, medical records, contact details (phone number and email) and address, physical location and ID number among other identifiers.

Other information which might be “personal” information may include:

- “device and device event information”: IP address, unique device identifier, the nature of the device which you used to access The Sharks Academy Website, the geographic location of your device, operating system details, browser type and version, browser language and system activity;
- “log information”: such as details of how, when and for how long you accessed and used The Sharks Academy Website and other site traffic and use information, landing pages, which pages you accessed and viewed, the amount of time spent and what you did on those pages, how you interacted with other site users, and exit pages;
- “location information”: We may use various technologies to determine your actual location, such as geographical data from your device (which is usually based on the GPS or IP location);
- “student information” such as the academic records of our students, their health records and information relating to their enrolment at the Academy and performance related information.

### **How do we use your data?**

- The Sharks Academy website and app are designed to allow our students to interact with the Academy. We use your personal data in various ways to facilitate this.
- The Sharks Academy’s use of your personal data allows us to create a specific student profile, to communicate with you, to provide you with information about us and yourself as a student, and may also include, where we are allowed to do so, contacting you about related material.
- Establish and verify your identity.
- Maintain and update our databases.

- Communicate with you in various ways such as e-mail, post, telephonically, SMS notifications, instant messaging or other notifications to your device (e.g. on-screen pop-up messages).
- Inform you about any changes to our terms of use, this privacy policy or other changes which are relevant to you.
- Carry out research and development.

**We collect your personal information in two ways, namely**

- actively from you;
- actively from you via recruitment agents;
- passively from your device when you create/access your student profile via The Sharks Academy Website.

**How long do we keep your personal information for?**

We retain all personal information which we collect from you (except for the information referred to below) unless there is a valid technical, legal or business reason for us to delete, destroy or de identify it (“retained information”).

We may keep all retained information for as long as you continue to engage with us and for three (3) years thereafter:

Notwithstanding the above, and any other provision of this privacy notice, we may keep some or all your personal information if and for as long as:

- we are required by law, a code of conduct or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

**Disclosure of your Personal Information**

We will not disclose, for commercial gain or otherwise, your personal information other than as set out in this privacy notice or with your permission.

## **We may disclose or share your personal information to or with:**

- our affiliates;
- our employees, contractors and agents if and to the extent that they need to know that information in order to process it for us and to provide services for or to us, such as site hosting, development and administration, technical support, financial services such as processing of payments, delivery services, marketing services (only in respect of our site, products and services) and other support services;
- in order to enforce or apply our terms of use or any other contract between you and us;
- in order to protect our rights, property or safety or that of our customers, employees, contractors, agents and any other third party;
- in order to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents or any other third party;
- any third party who acquires (or proposes to acquire) ownership or control of our assets, shares or management, or that of our affiliates, and our site, whether by sale, merger, acquisition or otherwise, and to any third party from who we acquire (or propose to acquire) ownership or control of assets, shares or management, whether by purchase, merger, acquisition or otherwise;
- governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary to:
  - comply with the law or with any legal process;
  - protect and defend the rights, property or safety of us, our affiliates or our customers, employees, contractors and agents or any third party;
  - detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorised use of our site and/or contravention of this privacy notice;
  - protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

We will get your permission before disclosing your personal information to any third party for any other purpose.

### **Change to this Policy**

We may change this privacy policy from time to time. If we do so, we will post the revised policy on our site and take reasonably practicable steps to ensure that you are aware of the updated privacy policy (including, if we have your e mail address, e-mailing you notifications of the updated privacy policy).

### **Access Information**

Your privacy is important to us. We strive to ensure that our use of your personal information or personal data is lawful, reasonable, and relevant to our business activities, with the goal of improving our services and your experience.

Should you wish to request access to information or records owned, held by or otherwise under our control, please see our Promotion of Access to Information Manual (PAIA) which can be accessed via The Sharks Academy website or directly from our designated information officers

1. [noon@thesharks.co.za](mailto:noon@thesharks.co.za) Information Officer
2. [Devashnee@thesharks.co.za](mailto:Devashnee@thesharks.co.za) Deputy Information Officer

### **Your Rights**

This Privacy Notice gives effect to many of our responsibilities as a responsible party in terms of the applicable legislation in the respective countries where we operate. If you have a concern about the way we are handling your information, for example if you feel we:

- are unlawfully processing your personal information;
- are not keeping your personal information secure;
- are misusing your personal information;
- are keeping personal information about you for longer than is necessary;
- hold inaccurate personal information about you;
- have disclosed personal information about you without your consent;

- have collected personal information for one reason and is using it for something else; or
- have accessed your personal information without your authorization.

If you have any queries or questions regarding your personal information or how we process it, please contact our Information Officers.

While we try to respond as promptly as possible, resolution times will vary depending on the nature of the complaint. Our Information Officers will liaise with our relevant departments to investigate your complaint. You will be notified of the outcome of your complaint as well as any action taken.

If you remain unhappy after the appeals process you may forward your complaint to the Information Regulator:

[infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

or the Information Regulator (South Africa):

SALU Building,

316 Thabo Sehume Street,

PRETORIA

Tel: 012 406 4818