

# Privacy Notice and POPIA Policy

Protea Pathways (Pty) Ltd

## PUBLIC POLICY | VERSION 1.0

|                |                                                                                         |
|----------------|-----------------------------------------------------------------------------------------|
| Effective date | 7 September 2026                                                                        |
| Review date    | 7 September 2027, or earlier if the law or services change                              |
| Applies to     | Protea Childcare, Protea Education, Protea Online, Protea Global and proteapathways.com |
| Document owner | Director / Information Officer                                                          |

This document reflects Protea Pathways' current operating model. It applies together with the relevant quotation, booking confirmation, consent forms and mandatory South African law, and will be reviewed when services, suppliers or legal requirements change.

## 1. Purpose and scope

Protea Pathways (Pty) Ltd respects privacy and aims to process personal information lawfully, reasonably and transparently. This notice applies to website visitors, clients, parents and guardians, children and learners, applicants, nannies, educators, contractors, suppliers and other people who interact with the company.

## 2. Responsible party and contact details

|                     |                                                                       |
|---------------------|-----------------------------------------------------------------------|
| Responsible party   | Protea Pathways (Pty) Ltd                                             |
| Information Officer | Narina Monique Minnaar, Owner and registered Information Officer      |
| Registration number | 2026/512281/07                                                        |
| Registered address  | 115 Sharlyn Avenue, Paarl, Western Cape, South Africa                 |
| Postal address      | No separate postal address; use the registered address or email       |
| Privacy email       | info@proteapathways.com                                               |
| Telephone           | 066 399 9277                                                          |
| Website             | <a href="https://proteapathways.com/">https://proteapathways.com/</a> |

## 3. Personal information we may collect

- Identity and contact information, including names, telephone numbers, email addresses and addresses.
- Booking and service information, correspondence, attendance information and payment records.
- Information about children and learners, including age, parent or guardian details, learning needs, allergies, health information, emergency contacts and authorised collection details where necessary.
- Applicant, employee and contractor information, including qualifications, references, work history, identity details and screening results.
- Website and device information, such as IP address, browser details, cookie choices and usage information, where the website tools collect it.
- Photographs, recordings or testimonials only where a suitable lawful basis and any required consent exist.

## 4. Why and on what basis we process information

Information may be processed to respond to enquiries; assess and confirm bookings; provide safe childcare, education, tutoring and online services; communicate with clients; process payments; manage staff and contractors; protect legal rights; keep required records; prevent misuse; and comply with law. Depending on the circumstances, processing may be based on consent, a contract, a legal obligation, protection of a legitimate interest, or another lawful ground under POPIA.

## 5. Children's personal information

Because Protea Pathways serves children and learners, some information may be special or sensitive. It must be limited to what is genuinely needed for the service or safety of the child. Information about a child will ordinarily be obtained from and managed with the child's parent, guardian or other competent person, unless another lawful basis applies. Children must not be asked to send identity documents, medical records or payment information through the chatbot.

## 6. Sources of information

Information is usually collected directly from the person concerned, a parent or guardian, an authorised representative, a job applicant or contractor. It may also come from lawful reference, qualification, identity, criminal-record or suitability checks. The website chatbot is used to collect basic enquiry and contact details when the owner is unavailable; it must not be used by children to submit sensitive information.

## 7. Sharing and operators

Information may be shared only where necessary with authorised personnel; assigned nannies, educators or tutors; GoDaddy for website hosting; Google services for approved cloud storage and communications; Capitec Bank for EFT banking records; future approved booking or online-lesson providers; professional advisers; emergency services; screening or verification bodies; insurers; and regulators or law-enforcement bodies where legally required. No analytics or social-media tracking pixel is currently declared as active. Service providers processing information for Protea Pathways should be bound by appropriate confidentiality and security obligations.

## 8. Cross-border processing

GoDaddy, Google and other online providers may store or process information outside South Africa. Protea Pathways will use providers subject to contractual, legal or other safeguards appropriate under POPIA and will update this notice when a booking, newsletter, payment, analytics or teaching platform is introduced.

## 9. Security and data incidents

Protea Pathways will use reasonable technical and organisational safeguards appropriate to the information and risk. Measures should include access controls, strong authentication, secure devices, appropriate backups, confidentiality duties, controlled sharing, staff awareness and secure disposal. Suspected loss, misuse or unauthorised access must be reported immediately to the Information Officer and assessed under POPIA's security-compromise requirements.

## 10. Retention

Information will be retained only for as long as required for the purpose collected, a contractual or legal requirement, dispute management, safeguarding or legitimate recordkeeping. A formal retention schedule must be approved for client, learner, safeguarding, financial, employment, applicant and marketing records.

## 11. Direct marketing

Electronic direct marketing will be sent only where permitted by POPIA. Recipients must be given a clear way to object or unsubscribe. Service messages needed to manage a booking are not marketing messages.

## 12. Cookies and analytics

The website should display a cookie notice that accurately identifies essential GoDaddy or website-function cookies. Protea Pathways does not currently declare Google Analytics or Meta Pixel as active. Optional analytics or advertising technologies must not be activated without updating the notice and implementing appropriate user choices.

## 13. Your rights

- ▣ Ask whether Protea Pathways holds personal information about you and request access where permitted.
- ▣ Request correction or deletion of inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained information.

- ❑ Object to processing where POPIA provides that right, or withdraw consent where processing depends on consent.
- ❑ Complain to Protea Pathways and, where appropriate, to the Information Regulator.

## 14. Changes to this notice

Material changes will be reflected by updating the effective date and, where appropriate, notifying affected people through the website, email or the relevant service channel.

## Policy administration

Questions, correction requests and policy concerns may be sent to [info@proteapathways.com](mailto:info@proteapathways.com) or 066 399 9277.

- ❑ Policy owner: Narina Monique Minnaar, Owner and Information Officer.
- ❑ Version: 1.0, effective 7 September 2026.
- ❑ Scheduled review: 7 September 2027, or earlier after a material operational or legal change.
- ❑ The current published version replaces earlier website copies of the same policy.

## Official legal and regulatory references

Protection of Personal Information Act 4 of 2013: <https://www.gov.za/documents/protection-personal-information-act>

Promotion of Access to Information Act resources and private-body manual template:  
<https://eservices.inforegulator.org.za/paiamanuals/>

Information Officer registration and POPIA resources: <https://inforegulator.org.za/popia/>

PAIA and POPIA complaints: <https://inforegulator.org.za/complaints/>

Consumer Protection Act 68 of 2008: <https://www.gov.za/documents/consumer-protection-act>

Electronic Communications and Transactions Act 25 of 2002:

<https://www.gov.za/documents/electronic-communications-and-transactions-act>

Children's Act and child-protection register information: <https://www.justice.gov.za/vg/children.html>