

Pluto Education Privacy Policy

This Privacy Policy is effective as of: 30th December 2019 ("Effective Date")

READ THIS POLICY CAREFULLY BEFORE BROWSING THIS WEBSITE OR USING ANY OF THE SERVICES. YOUR CONTINUED USE OF THIS WEBSITE INDICATES THAT YOU HAVE BOTH READ AND AGREE TO THE TERMS OF THIS PRIVACY POLICY. YOU CANNOT USE THIS WEBSITE IF YOU DO NOT ACCEPT THIS POLICY. ALL SECTIONS OF THIS POLICY ARE APPLICABLE TO BOTH MEMBERS AND GUESTS UNLESS THE SECTION EXPRESSLY STATES OTHERWISE.

0 Mashauri Limited “Mashauri” Users:

0.1 Mashauri will be the data controller, and ultimately take full responsibility and ownership of your information, consent and privacy governed by their own independent Privacy Policy.

0.2 You grant Pluto Education explicit permission to allow Mashauri access to all your information and activity, including website logs (superseding section 3 below).

1 Introduction

1.1 This Privacy Policy is to be read as if specifically incorporated into the Terms of Service, available at: <https://www.mypluto.co.za/terms-of-service>.

2 Privacy Policy

2.1 For the purposes of this section, Personal Information will be understood in accordance with the definition provided in the Protection of Personal Information Act 4 of 2013 ("the Act"). Pluto Education also subscribes to the principles for electronically collecting personal information outlined in the Act, and the further legislation referred to therein. We endeavour to ensure the quality, accuracy and confidentiality of Personal Information in our possession.

2.2 In adopting this Privacy Policy, we wish to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take all reasonable steps to prevent unauthorised access to, or disclosure of your Personal Information. However, it is impossible to guarantee that your Personal Information shall be 100% secure.

2.3 Users will be prompted to register an account with Pluto Education. In so doing, users may be asked to provide the following information (Personal Information):

2.3.1 First name; and

2.3.2 Surname; and

2.3.3 Race; and

- 2.3.4 Email; and
- 2.3.5 Sex; and
- 2.3.6 Age; and
- 2.3.7 Physical address; and
- 2.3.8 Phone number; and
- 2.3.9 Sexual orientation; and
- 2.3.10 Language; and
- 2.3.11 Religion; and
- 2.3.12 Marital status; and
- 2.3.13 Physical or mental health; and
- 2.3.14 Pregnancy; and
- 2.3.15 National, ethnic or social origin; and
- 2.3.16 Disability; and
- 2.3.17 Conscience; and
- 2.3.18 Bank account details; and
- 2.3.19 Information relating to education; and
- 2.3.20 Financial history; and
- 2.3.21 Employment history; and
- 2.3.22 Medical history; and
- 2.3.23 Criminal history; and
- 2.3.24 Culture; and
- 2.3.25 Company / CC / business name; and

2.3.26 Company / CC / business registration number.

2.4 We will attempt to limit the types of Personal Information we process to only that to which you consent to (for example, in the context of online registration, newsletters, message boards, surveys, polls, professional announcements, SMS, MMS and other mobile services), but, to the extent necessary, your agreement to these this Privacy Policy constitutes your consent as contemplated in section 69 of the Act.

2.5 All payment information will be captured through the Website. Further, Pluto Education shall not retain payment information on behalf of its users.

2.6 We will not collect, use or disclose sensitive information (such as information about racial or ethnic origins or political or religious beliefs, where relevant) except with your specific consent or in the circumstances permitted by law.

2.7 By agreeing to the terms contained in this Privacy Policy, you consent to the use of your Personal Information in relation to:

2.7.1 The provision and performance of the services;

2.7.2 Informing you of changes made to our website;

2.7.3 The provision of marketing related services to you by Pluto Education;

2.7.4 Responding to any queries or requests you may have;

2.7.5 Developing a more direct and substantial relationship with users for the purposes described in this clause;

2.7.6 Developing an online user profile;

2.7.7 Understanding general user trends and patterns so that we can develop and support existing and ongoing marketing strategies;

2.7.8 For security, administrative and legal purposes; and

2.7.9 The creation and development of market data profiles which may provide insight into market norms, practices and trends to help us improve our offering to you. Such information will be compiled and retained in aggregated form, but shall not be used in any way which may comprise the identity of a user.

2.8 Although absolute security cannot be guaranteed on the internet, Pluto Education has in place up-to-date, reasonable technical and organisational security measures to protect your Personal Information against accidental or intentional manipulation, loss, misuse, destruction or against unauthorised disclosure or access to the information we process online.

2.9 While we cannot ensure or warrant the security of any Personal Information you provide us, we will continue to maintain and improve these security measures over time in line with legal and technological developments.

2.10 We store your Personal Information directly, or alternatively, store your Personal Information on, and transfer your Personal Information to, a central database. If the location of the central database is located in a country that does not have substantially similar laws which provide for the protection of Personal Information, we will take the necessary steps to ensure that your Personal Information is adequately protected in that jurisdiction by means of ensuring that standard data protection clauses are enforced.

2.11 Your information will not be stored for longer than is necessary for the purposes described in these Terms or as required by applicable legislation.

2.12 The Personal Information Pluto Education collects from users shall only be accessed by Pluto Education employees, representatives and consultants on a need-to-know basis, and subject to reasonable confidentiality obligations binding such persons.

2.13 Pluto Education shall have the right, but shall not be obliged, to monitor or examine any information and materials including any website link that you publish or submit to Pluto Education for publishing on the Site. You shall be solely responsible for the contents of all material published by yourself.

2.14 We constantly review our systems and data to ensure the best possible service to our users. We do not accept any users, or representatives of users, under 18 years of age or who otherwise does not have the relevant capacity to be bound by this Privacy Policy.

2.15 We do not accept any users, or representatives of users, under the age of majority or who otherwise does not have the relevant capacity to be bound by this Privacy Policy, unless such users have, through their parent or guardian, consented to the terms hereof.

2.16 You hereby consent to the sharing of your Personal Information to the following third parties, namely Mashauri Limited, together with Google and Hotjar. Insofar as payment systems may be included, Personal Information is shared with PayFast, PayPal and Stripe. Further, Pluto Education stores certain information at Xneelo, Cloudways, in Dropbox, on Google and on Microsoft. We will not use your e-mail address for unsolicited mail. Any emails sent by Pluto Education will only be in connection with the provision of our services and/or the marketing thereof.

2.17 The Personal Information provided by you is necessary in order that Pluto Education may provide the requisite services to you, and failure to provide such Personal Information may render Pluto Education unable to provide such services.

3 Log Files

3.1 When you visit Pluto Education, even if you do not create an account, we may collect information, such as your IP address, the name of your ISP (Internet Service Provider), your browser, the website from which you visit us, the pages on our website that you visit and in what sequence, the date and length of your visit, and other information concerning your computer's operating system, language settings, and broad demographic information. This information is aggregated and anonymous data and does not identify you specifically. However, you acknowledge that this data may be able to be used to identify you if it is aggregated with other Personal Information that you supply to us. This information is not shared with third parties and is used only within Pluto Education on a need-to-know basis. Any individually identifiable information related to this data will never be used in any way different to that stated above, without your explicit permission.

4 Cookies

4.1 Pluto Education uses cookies. A cookie is a small piece of information stored on your computer or smart phone by the web browser. The two types of cookies used on the Website are described below:

4.1.1 "Session cookies": These are used to maintain a so-called 'session state' and only lasts for the duration of your use of the Website. A session cookie expires when you close your browser, or if you have not visited the server for a certain period of time. Session cookies are required for the Platform to function optimally, but are not used in any way to identify you personally.

4.1.2 "Double Click Cookies" Third party vendors with whom we contract may use cookies to serve a user ads based on a user's prior visits to the Website. Users may, however, opt out of receiving these ads by visiting www.aboutads.info.

4.1.3 "Permanent cookies": These cookies permanently store a unique code on your computer or smart device hard drive in order to identify you as an individual user. No Personal Information is stored in permanent cookies. You can view permanent cookies by looking in the cookies directory of your browser installation. These permanent cookies are not required for the Pluto Education website to work, but may enhance your browsing experience.

5 Links from Pluto Education

5.1 Pluto Education, and the services available through the Website, may contain links to other third party websites, including (without limitation) social media platforms, payment gateways, appointment scheduling and/or live chat platforms ("Third Party Websites"). If you select a link to any Third Party Website, you may be subject to such Third Party Website's terms and conditions and/or other policies, which are not under the control, nor responsibility, of Pluto Education.

5.2 Hyperlinks to Third Party Websites are provided "as is", and Pluto Education does not

necessarily agree with, edit or sponsor the content on Third Party Websites.

5.3 Pluto Education does not monitor or review the content of any Third Party Website. Opinions expressed or material appearing on such websites are not necessarily shared or endorsed by us and we should not be regarded as the publisher of such opinions or material. Please be aware that we are not responsible for the privacy practices, or content, of other websites, either.

5.4 Users should evaluate the security and trustworthiness of any Third Party Website before disclosing any personal information to them. Pluto Education does not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure to third parties of personal information.

6. Your Rights

6.1 Users have the right of access to their Personal Information stored and processed by Pluto Education. This may be done by emailing us at the address referred to in clause 7.4.6 below.

6.2 Users have the right to rectification of Personal Information that we hold on a user's behalf, in instances where such Personal Information is incorrect or incomplete.

6.3 Users have the right of erasure of Personal Information ("right to be forgotten") if such information is no longer needed for the original processing purpose, alternatively if a user withdraws their consent and there is no other reason or justification to retain such Personal Information, further alternatively, if a user has objected to such Personal Information being processed and there is no justified reason for the processing of such Personal Information.

6.4 Users have the right to restrict/suspend processing of Personal Information to only that which is strictly necessary for Pluto Education to perform its services to a User.

6.5 If we breach any of the terms of this Privacy Policy, users have the right to complain to the requisite data protection authority in their territory, and in addition, same may be raised with Pluto Education at the mail address stipulated in clause 7.4.6 below.

6.6 Users have a right to withdraw their consent at any time, if processing of Personal Information is based on consent.

6.7 Users have a right to object to processing of Personal Information, if such processing is based on legitimate interests.

6.8 Users have a right to object to the processing of Personal Information for direct marketing purposes.

7 Application Of The Electronic Communications And Transactions Act 25 Of 2002 ("Ect Act")

7.1 Data Messages (as defined in the ECT Act) will be deemed to have been received by Pluto Education if and when Pluto Education responds to the Data Messages.

7.2 Data Messages sent by Pluto Education to a user will be deemed to have been received by such user in terms of the provisions specified in section 23(b) of the ECT Act.

7.3 Users acknowledge that electronic signatures, encryption and/or authentication are not required for valid electronic communications between users and Pluto Education.

7.4 Information to be provided in terms of section 43(1) of the ECT Act:

7.4.1 Users warrant that Data Messages sent to Pluto Education from any electronic device, used by such user, from time to time or owned by such user, were sent and or authorised by such user, personally.

7.4.2 This Website is owned and operated by Pluto Education (Pty) Ltd, a private limited South African company operating in accordance with the company laws of the Republic of South Africa.

7.4.3 Address for service of legal documents: Address given upon request.

7.4.4 Contact Number: 078 360 4367

7.4.5 Pluto Education - located at www.mypluto.co.za;

7.4.6 Email address: privacy@mypluto.co.za

7.4.7 This Privacy Policy has been prepared by [Legal Legends](http://www.legallegends.co.za):
<https://www.legallegends.co.za>