

Pragma Group | Academy Privacy Notice

This notice was last updated on 01/11/2024.

This privacy notice tells you how we collect, use and disclose your personal information when you provide products and services to Pragma.

This notice may change, but we will let you know if it does.

POPIA/GDPR-005 Academy PN

Effective: 1 November 2024

Version 1.4

1. Personal information we collect and use

When you register for a course with us, we collect personal information directly from you, including

- full name(s) and surname
- email address

In the case of specific learning pathways or qualifications, we may also collect additional information, including

- identity number or passport number
- citizenship
- date of birth
- gender
- ethnicity
- educational background
- disability
- immigrant status
- proctoring recordings and analysis

We may also receive personal information from your employer.

We use this information to provide you with our services and to maintain our relationship with you. We will only collect your personal information for validation purposes, to help us decide whether you qualify for our courses, to deliver our services, and to comply with our legal obligations.

We record virtual training sessions to make them available to learners. All qualification recordings are stored for 12 months and all other recordings are stored for three months.

In the case where exam proctoring is required and enabled, a complete recording of the proctored sessions will be made for review purposes and deleted after 1 month if no further analysis is needed.

2. We share your personal information with our trusted suppliers and other companies in the Pragma Group

When you share information with us, you are sharing information with all companies in the Pragma Group which consist of the companies listed in our Pragma Group Profile document that can be found in the 'About us' section on our website:

[About Pragma - Enterprise Asset Management \(pragmaworld.net\)](https://www.pragmaworld.net)

We share personal information with external authorities such as SETA and QCTO for validation. For some exams, we use the Constructor proctoring system. Constructor is located in Switzerland, and the proctoring information will be stored in the European Union for one month, or longer if additional assessment is required. We will notify you before using this proctoring system and allow you to review the process and Constructor's privacy notice before taking the exam ([Privacy notice | Constructor Technology](#)).

We store personal information in South Africa and the Netherlands.

We use suppliers, service providers and contractors that we trust, to help us run our business. They have agreed to keep your personal information secure and confidential, and to only use your personal information for the purposes that we shared it with them.

Some of the service providers and contractors we use may be located in countries outside South Africa and the European Union. These countries may not have the same levels of protection of personal information as South Africa and the European Union. In this case, those service providers and contractors must undertake to protect your personal information to the same level that we do.

Sometimes the law requires that we share your personal information, for instance, to comply with tax and employment laws.

3. We do not keep your information longer than we must

We must keep your personal information to keep record of your qualifications and to advise you or your organisation on what competencies in the Asset Management sector you have achieved and what training will be beneficial towards your Asset Management succession and knowledge growth. We will not keep your information for longer than we need to for operational reasons, or longer than the law requires.

4. We have taken reasonable steps to minimise the impact of a breach

We have reasonable security measures in place to protect personal information from:

- being lost;
- being used in the wrong way or for the wrong reason;
- being accessed without authorisation;
- being changed; and
- being destroyed.

The more sensitive the information is, the better we protect it. However, no system is perfect, and we cannot guarantee that we will never experience a breach of any of our physical, technical, or managerial safeguards, that is why we check our systems regularly for security issues.

If something should happen, we have taken steps to minimise the threat to your privacy, and we will let you know if your personal information has been compromised. We will also let you know how you can help minimise the impact of the breach.

If you suspect that we (or you) have had a security breach, please let us know immediately by sending an email to: cybersecurity@pragmaworld.net

Please include as much information as you can about what has happened.

5. Your rights and preferences

You have the right to:

- ask what we know about you;
- ask what personal information we sent to our suppliers, service providers, or anyone else;
- ask us to update, correct or delete any out-of-date or incorrect personal information we hold about you;
- unsubscribe from any direct marketing we may send you;
- object to our use of your personal information;
- ask us to restrict our processing of your personal information; and
- reuse your personal information for your own purposes across different services, also known as the right to data portability.

It can take us up to 21 days to respond to your request because there are procedures that we must follow. In some instances, we may ask you for proof of your identity or a valid proof of residence.

If you live in the European Union, you have the right to complain to a supervisory authority in the Member State where you live or work, or where a data protection law infringement occurred. If you live in South Africa, you have the right to complain to the [Information Regulator \(inforegulator.org.za\)](https://www.inforegulator.org.za).

6. Contact us

If you have any questions, please get in touch with us at:

Information.officer@pragmaworld.net

Our information officers are listed in our PAIA manual on our website. [PAIA-Manual.pdf \(pragmaworld.net\)](#)

For notification of an information breach, as mentioned in paragraph 4, please contact:

cybersecurity@pragmaworld.net