



PD GLADES POPIA ACT & GDPR POLICY

This policy must be read in conjunction with the other policies presented on this Learning Portal. POPI is designed to promote the protection of personal information and to bring South Africa's privacy laws in line with international standards through the "Protection of Personal Information Act 4 of 2013 (POPIA)". It limits the rights of businesses to collect, process, store, and share personal information. It also makes businesses accountable for protecting the privacy of this information. We at PD Glades facilitate this transparency and control by allowing you to Read or re-read our Privacy statement and policies

CONTACT OUR PRIVACY OFFICER

Do a Data request to see what information we keep on record about you

Export all of your personal data in a downloadable format

Delete your account completely. This however will be done on request as the deletion may impact on completion reports your employer / department / school / university or college may require.

POPI ACT POLICY

Last updated: 14 June, 2024

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You. We use Your Personal data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

INTERPRETATION AND DEFINITIONS

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for You to access our Service or parts of our Service - our courses.

Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

Application refers to PD Glades Learning Portal, the software program provided by the Company.

Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to PD Glades, Little Falls, Johannesburg, South Africa.

Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Country refers to: South Africa

Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual.

Service refers to the Learning Portal or the Website or both.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to PD Glades Learning Portal, accessible from www.pdglades.com or <https://learning.pdglades.com>

You means the individual accessing or using the Service, or the company, employer, department, school, university or college or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

COLLECTING AND USING YOUR PERSONAL DATA

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Usage Data
- Usage Data
- Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service (the learning portal) that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, such as a tablet, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service / Learning Portal or when You access the Service by or through a mobile device.

TRACKING TECHNOLOGIES AND COOKIES

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

Web Beacons. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of

user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

COOKIES POLICY / NOTICE ACCEPTANCE COOKIES

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website. Cookies also allow the software to know where you left off in a course and when you return, provide you with the opportunity to continue from that point, rather than from the start.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy or the Cookies section of our Privacy Policy.

USE OF YOUR PERSONAL DATA

The Company may use Personal Data for the following purposes:

To provide and maintain our Service, including to monitor the usage of our Service.

To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

For the performance of a contract: the development, compliance and undertaking of the purchase contract for our courses and services You have purchased or enrolled on or any other contract with Us through the Service.

To contact You: To contact You by email or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products (courses) or contracted services, including the security updates, when necessary or reasonable for their implementation.

To manage Your requests: To attend and manage Your requests to Us including support requests.

For other purposes: We may use Your information for other purposes, such as statistics on the popularity of a course. This information is anonymized.

We may share Your personal information in the following situations:

With Your Employer: We may share Your personal information with your employer / department / university or college or school management to report on your progress and completion status. The progress and or completion reports which we generate, must contain your name, surname and email address as an example, so as to identify you on the report(s).

RETENTION OF YOUR PERSONAL DATA

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods. Please note that in order for any certificates that you may have earned on this Learning Portal to be verifiable in future, we need to retain your name, surname and email address, as well as the course and the date on which the certificate for that course was issued. Requesting a data deletion may render your certificate not verifiable. The net effect of this is that although you will be automatically unenrolled from a course after the default 60 days, our certification system will retain your name, surname and email address, as well as the course and the date on which the certificate for that course was issued in order for the certificate to be kept on our records to facilitate a future verification request. To reiterate, should you request a deletion of your data from our Learning Portal, your certificate(s) may not be verifiable as all your data has been securely wiped.

TRANSFER OF YOUR PERSONAL DATA

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction. Your consent to this Privacy Policy followed by Your submission of such information, thus represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

DELETE YOUR PERSONAL DATA

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You. Our Service may give You the ability to delete certain information about You from within the Service. You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the Edit profile section that allows you to manage Your personal information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us. Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

DISCLOSURE OF YOUR PERSONAL DATA

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

LAW ENFORCEMENT

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

OTHER LEGAL REQUIREMENTS

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

SECURITY OF YOUR PERSONAL DATA

The security of Your Personal Data is important to Us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security. However, do keep in mind that the HTTPS (Hypertext Transfer Protocol Secure) that we use, encrypts data during transmission. It uses TLS (Transport Layer Security) to protect the communication between your browser and our server. When you visit our Learning Portal with HTTPS, all data exchanged—such as login credentials and personal information—is always encrypted. This prevents malicious parties from intercepting this sensitive data.

CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 16. We do not knowingly collect personally identifiable information from anyone under the age of 16. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 16 without verification of parental consent, We take steps to remove that information from Our servers. If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may

require Your parent's consent before We collect and use that information. There is no reason a child under 16 years of age should normally register for one of our corporate or school courses but sometimes a client may ask whether we can enroll a bright child, in which case we oblige the client. Also, should a school request access to a course for their learners, then we will oblige after pointing out the age factor.

LINKS TO OTHER WEBSITES

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

CHANGES TO THIS PRIVACY POLICY

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page. We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

COOKIE POLICY

Please read this policy in conjunction with our privacy notice, as well as our POPI Act policy which sets out additional details on how we use personally identifiable information and your various rights.

WHAT ARE COOKIES?

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the site or a third-party to recognise you and make your next visit easier and the site more useful to you. Essentially, cookies are a user's identification card for PD Glades' Moodle server (the LMS we at PD Glades use). Web beacons are small graphic files linked to our servers that allow us to track your use of our site and related functionalities. Cookies and web beacons allow us to serve you better and more efficiently, and to personalise your experience on our site. Without cookies this learning management system could not function. Cookies are used to store your login status and to correctly identify you as an authenticated user. Cookies also allow us to prevent fraudulent use of user accounts and offer certain site features. When you log in, you agree that PD Glades Learning / PD Glades Learning may store cookies in your web browser.

HOW OUR LEARNING MANAGEMENT SYSTEM (LMS) USES COOKIES

When you use and access the site, we may place a number of cookie files in your web browser. The Modular Object-Oriented Dynamic Learning Environment LMS we at PD Glades use, makes use or may use cookies to help us determine and identify you. To the extent that cookie data constitutes personally identifiable information, we process such data on the basis of your consent. We use both session and persistent cookies on the site, and we use different types of cookies to run the site:

Essential cookies. Necessary for the operation of the site. We may use essential cookies to authenticate users, prevent fraudulent use of user accounts, or offer site features.

Functionality cookies. Used to recognise you when you return to the site. This enables us to personalise our content for you, greet you by name, and remember your preferences (for example, your choice of language or region, or where you stopped reading in a lesson during your previous visit).

WHAT ARE YOUR CHOICES REGARDING COOKIES?

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your specific web browser. Please note however, that if you delete cookies or refuse to accept them, you might not be able to use some or all of the features of this Learning Portal. You may not be able to log in, store your preferences, and some of our pages might not display properly.

Cookies must be enabled in your browser

Two cookies are used on this site:

1. The essential one is the session cookie, usually called MoodleSession. You must allow this cookie in your browser to provide continuity and to remain logged in when browsing the site. When you log out or close the browser, this cookie is automatically destroyed (in your browser and on our server).
2. The other cookie is purely for convenience, usually called MOODLEID or similar. It just remembers your username in the browser. This means that when you return to this site, the username field on the login page may already be filled in for you. It is safe to refuse this cookie - you will just have to retype your username each time you log in.

CONTACT US

If you have any questions about this Privacy Policy, You can contact us:

By email: contact@pdglades.com

By visiting this page on our website: <https://pdglades.com/user/profile.php>

PD GLADES GDPR PRIVACY POLICY

This privacy notice relates to all user accounts created on this site.

Privacy and personal data:

We take your privacy very seriously. In order to provide access to this site, we need to collect and store some personal information about you.

WHAT IS COLLECTED?

We collect the data that you or your employer provide when creating an account, such as name, surname and email address. Should your account on the PD Glades Learning Portal be created on your behalf, then your name and email address are still collected. We also collect data about your activity on the site, including any contributions that you make. This is typically your progress through a course so the that the system knows where you left off and whether you have completed a course.

HOW IS THIS INFORMATION USED?

This information is only used to provide access to the online courses on this site. Your name and email address may also be used on a report, should your employer request such a report. This is typically a completion report, indicating your progress through a course.

HOW LONG IS YOUR DATA STORED?

Your personal data is stored as long as your account is active on this site. The account data is wiped on request. You can request a copy of your data, or the deletion thereof, by accessing your profile on the Learning Portal. Keep in mind that when you request the deletion of your account on our Learning Portal, that any certificate(s) you may have earned, may not be verifiable in future and, should you lose a certificate, we will be unable to re-issue it as all your data has been securely wiped.

Here is our full data privacy policy (more detail):

PRIVACY NOTICE

Last updated: 14 June 2024

This privacy notice sets out how PD Glades collects and uses information about you when you use our Learning Portal and why we collect certain personal data. This notice also explains the choices that you can make about the way that we use your information.

Your privacy protection is important to us. This is why we have adopted the following pivotal legislation:

- EU's General Data Protection Regulation 2016/679 ("GDPR"),
- UK General Data Protection Regulation ("UK GDPR") and the
- California Consumer Privacy Act 2018 ("CCPA"). This privacy notice relates to all personal data we process and addresses the legislation mentioned.
- South Africa's Protection of Personal Information Act 4 of 2013 (POPIA)

'Personal data', in this privacy notice, means any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

USEFUL RESOURCES

We remain committed to providing a secure Learning Portal that protects the privacy and security of learners' and employees' data. We provide all users with the tools to ensure that their data, information

and operations are secure and protected. Privacy features embedded with this LMS ensure that PD Glades is GDPR compliant and adheres to local privacy legislation requirements.

WHY WE COLLECT YOUR PERSONAL DATA

In order for us to provide you with our services or for correspondence purposes we need to collect your personal data. We ensure that the information we collect, and use is confined to this purpose. We always process your personal data for specific purposes, with the nature of the data collected depending on your interaction with us. We are committed to transparency in this.

OUR LEGAL BASES FOR CONTROLLING OR PROCESSING PERSONAL DATA ARE:

- Article 6.1(a) GDPR (Consent): You provide informed consent to us or have a reasonable expectation that we will use your information in a certain way – for example, to engage in our optional community discussions (when available), or to hear about new services or offers. You can withdraw your consent at any time.
- Article 6.1(b) GDPR (Contract): Providing our services and fulfilling our obligations to you, usually relating to a terms of service or partnership agreement;
- Article 6.1(c) GDPR (Legal Obligation): The necessity to meet compliance with our legal obligations; and/or
- Article 6.1(f) GDPR (Legitimate Interest): Where it is in our legitimate interests to do so. We only rely on ‘legitimate interests’ as the legal basis for processing by us, or third parties we use, for these purposes:
 - recruitment and induction of new employees, contractors and other people who work with us or for our clients;
 - emergency contacts for people who work with us, such as employees and contractors for health and safety purposes;
 - business development; or
 - providing login systems to users via their existing social media accounts. This option (4) is not currently in use by PD Glades.

Where we rely on a specific basis for processing your information and you wish to object to that processing, you must be aware that it might not be possible for you to continue using our services. For instance, if you refuse to provide your name, surname and email address, we cannot practically enroll you on any course.

THE SPECIAL CATEGORIES OF PERSONAL DATA (ARTICLE 9 OF GDPR) WE PROCESS ARE:

any special categories of special personal data which any user volunteers while using our services (for example in a forum or submission).

If we need to pass on special category personal data (see Article 9 of GDPR) to a third party, we will only do that in accordance with the legal bases under Article 6 of GDPR as outlined above.

HOW WE COLLECT PERSONAL DATA

PD Glades collects personal data from you when you interact with us on this Learning Portal. This can be through our website, our Learning Portal, over the phone, in person, including, without limitation, when you:

- create an individual or corporate user account;
- request support;
- register for or participate in an online class, exam, certification, training, webcast or other event;
- request information or materials;
- participate in surveys or evaluations;
- submit questions or comments; or
- submit content or posts on our forums or other interactive activities on the Learning Portal.

HOW WE USE PERSONAL DATA

We may need to pass your personal data on to third-party service providers contracted to PD Glades in the course of dealing with you. We do this because there are services, such as our video conferencing facility, or Webinar or video calling which will not work unless we are able to make these transfers. Any third parties we share your data with, are obliged to keep your personal data secure and use it only for necessary service delivery. When your data is no longer required to fulfil the service, those third parties will be directed to dispose of your data in accordance with our standard procedures.

HOW WE STORE PERSONAL DATA

We will process (collect, store and use) the information you provide in a manner compatible with GDPR. We maintain physical, organisational and technical safeguards for all personal data we hold. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

We will process different forms of personal data for as long as it is necessary and proportionate for the purpose for which it has been supplied and we will store the personal data for the shortest amount of time possible, taking into account legal and service requirements.

Your rights when we process your personal data

- At any point while we are in possession of or we process your personal data, you have the following rights:
- right to withdraw consent;
- right of access;
- right of rectification;
- right to erasure;
- right of data portability;
- right to restrict processing;
- right to object;
- right to object to automated processing, including profiling;
- right to know;
- right to opt out of the sale of your personal information (although we never ever sell your data);
- right to judicial review: in the event that we refuse your request under rights of access, we will provide you with a reason as to why;
- right to be free of discrimination if you exercise your rights;
- notification of data breaches; and/or
- the right to lodge a complaint with a supervisory authority.

Where we are your Data Controller, please make your request directly to the Data Protection Officer. We will always respond within one month. However, if we are processing your data on behalf of your Data Controller (your service provider) you should contact them directly.

PRIVACY NOTICES OF OTHER WEBSITES

This privacy notice outlines how we manage your personal data. If the website you are using is not hosted by us or you click on a link to another website, we encourage you to read their privacy notice.

CHILDREN AND PERSONAL DATA

Here at PD Glades, we understand the importance of protecting the personal data of children under the age of 16. It is not our intention to collect personal data from a child. If you believe that a child has disclosed personal data or that we hold personal information about a child, please email us. There is no reason a child should normally register for one of our corporate courses but sometimes a client asks whether we can enroll a bright child in which case we oblige the client. Also, should a school request access to a course for their learners, then we will oblige after pointing out the age factor.

VERIFICATION

Before we action a personal data request, we need to verify your identity. We accept a request made through your personal PD Glades Learning Portal account (while you are logged in) as a valid verification. For this reason, you should never share your login credentials with anyone.

AMENDMENTS TO OUR PRIVACY NOTICE

PD Glades updates our privacy notice when necessary or in response to:

- feedback from our community, customers, relevant authority, industry or other stakeholders;
- changes in our products or services; and/or
- data processing or policy changes.

The “last updated” date at the top of this privacy notice reflects when the most recent changes were made. We encourage you to periodically review this privacy notice for any amendments.

HOW TO CONTACT US

If you have any questions about our privacy notice, please contact us at contact@pdglades.com

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