PRIVACY NOTICE FOR THE INTERNATIONAL TRADE INSTITUTE OF SOUTHERN AFRICA NPC (ITRISA)

This privacy notice applies to:

- Current and past students
- Trainees
- Clients and business contacts
- Employees and prospective employees

of the International Trade Institute of Southern Africa NPC (ITRISA)

The purpose of this privacy notice is to help you understand how, when and why we collect, use, share, protect, store and destroy your personal information.

By 'personal information', we mean all information that we collect from distance learning student registrations, from our alumni, from short course trainee registrations, from company personnel and individuals enquiring about our services, from our directors, our service providers and our employees, and through our website www.itrisa.co.za (the ITRISA website).

In this privacy notice, we explain:

- How we use your personal information
- How we keep your personal information secure, and
- Your ‘data subject’ rights

We may update this privacy notice from time to time. We will inform you as and when we do.

Should you have any questions about who we are, or what we do with your personal information, please email Sakhile Vanqa at info@itrisa.co.za.

If you have any concerns about how we have secured or handled your personal information, you can contact the Information Regulator at inforeg@justice.gov.za.
1. How we use the information provided by our distance learning students and alumni

1.1 What personal information we collect and generate

We collect information from i) completed student registration forms, ii) copies of prior qualifications and ID documents that potential students must also submit to us, iii) student declaration forms and iv) signed student undertakings to pay study fees and v) assessed/marked student assignments and examination scripts.

We generate information about our students by creating a file for each student and producing reports from our Learning Management System. We also produce reports on student payments in order to manage credit facilities.

1.2 When and why we collect and process your personal information

Student information is collected at the time of registration, shortly after a registration has been successfully processed, and on completion of the assessment of assignments and examinations.

We collect and process student information so that we can i) undertake identity verification; ii) determine whether or not registrants meet the specified entry requirements for our education programmes, iii) maintain regular contact with students, iv) register students on our Learner Management System (LMS), and v) meet our legal obligations, i.e. comply with the student data requirements of the Dept of Higher Education and Training (DHET)/Council on Higher Education.

2. How we use the information provided by companies on the personnel they are registering on an ITRISA short course, and by individuals registering themselves on an ITRISA short course

2.1 What personal information we collect and generate

We collect personal information from completed short course booking forms and from the assessment exercises undertaken by trainees after attending a training session. The information collected consists of trainee names, work designations, contact details (telephone numbers and email addresses) and assessment results.

We generate reports from this information to facilitate the dispatch of material/certificates/training evaluation forms to these individuals before and after a particular course and to determine who might require additional assistance on any particular aspect of the training after the event.

2.2 When and why we collect and process your personal information
Personal information is collected and recorded to assist us in i) determining which individuals are attending a particular course; ii) in the case of contact training sessions, whether or not a trainee has any particular food requirements; iii) to contact those trainees who do not arrive at the course to check on the reasons for non-attendance; and iv) on completion of a course, to send out course evaluation forms, assessment tools for completion and certificates of attendance to those trainees who opt not to undertake knowledge/skills assessment.

Evaluation results are recorded for the purposes of issuing to trainees, where relevant, certificates of competence/achievement and at a later stage, copies of such certificates where the originals have been lost or stolen. We also use trainee contact details to alert those who have already attended one of our courses, to the future dates on which related courses will be conducted.

3. **How we use the information provided by clients and business contacts**

3.1 What personal information we collect and generate

We collect contact details and other relevant information from all individuals who i) have approached us for input on our services or ii) have previously used our consulting services, training services or education services. Personal information (names, companies where employed and contact details) is also collected from individuals who visit our website or social media pages and contact us for further details on our various services.

3.2 When and why we collect and process your personal information

At the time of receipt, client and business information is placed on a database that is used to i) market upcoming courses and programmes and ii) send out, from time-to-time, institution- and trade-related updates via a newsletter. The database may also be consulted on a selective basis for telephonic and email notifications of events considered to be relevant to a particular individual.

4. **How we use the information provided by our employees and those who have applied for employment at ITRISA**

4.1 What personal information we collect and generate

We collect information from i) formal job applications, ii) curriculum vitae/resumes and iii) personal interviews.

We generate information about our employees for SARS, the Education & Training SETA, the Department of Labour, and the Department of Education/Council of Higher Education, as well as for certain medical insurance and retirement annuity/provident fund providers.

4.2 When and why we collect and process your personal information
Personal information is collected i) when an application for employment is received; ii) when a potentially suitable applicant is interviewed; iii) when a contract of employment is entered into; and iv) at various intervals throughout the employee’s term of employment.

The information processed is used to register new employees for tax and insurance purposes, to ensure their eligibility for skills development bursaries, and to provide them with certain employee benefits.

5. **Because of the nature of what we do, and the size of our organisation, we are obliged to sub-contract certain services to others.**

The International Trade Institute of Southern Africa NPC (ITRISA) uses service providers to assist it in a number of areas:

i) in the maintenance of its IT infrastructure, including its Learner Management System (LMS).
ii) in the administration of its database
iii) in the handling of its financial reporting and the audit of its annual accounts
iv) in the delivery of study material to students across the country
v) in the assessment of student assignments and examinations
vi) in the invigilation of examinations countrywide, and
vii) in the printing of Certificates and Diplomas.

Our contracts with these companies/individuals provide for the safeguarding of our clients’/trainees/students’ personal information, where we are required to share it.

6. **Steps taken to minimize the impact of a breach in security**

ITRISA’s electronic equipment is protected by security software which is regularly upgraded/renewed. In addition, its business premises are secured with alarm systems, security gates and burglar bars, and the complex in which the company is located is surrounded with security fencing and is gated.

These safeguards are in place to *inter alia* protect your personal information from loss, unauthorized use, tampering of any kind, or from being destroyed.

No system, however, can be fully guaranteed. We therefore cannot guarantee that your personal information will not be negatively impacted by a breach in our security measures.

In event of a security breach, we will do everything within our means to minimize the threat to your privacy, and will inform you if your data has been compromised. We will also let you know how you can assist us in minimizing the impact of any breach.

7. **Use of your personal information with your consent**
Where you have previously given us your personal information because you have requested input on one or other of our services, you are entitled to withdraw your consent to our use of this information at any time. This can be achieved by simply clicking on the ‘Unsubscribe’ button on any of our mailers, or by contacting Sakhile Vanqa at info@itrisa.co.za.

8. **From time to time, ITRISA is also obliged to share with certain regulatory bodies personal information provided by its students.**

As a registered provider of higher education, we are mandated to share certain personal information of students registered on our qualification programmes with certain government bodies, notably:

i) The Department of Higher Education

ii) The Council on Higher Education

Where we are legally obliged to share your personal information with certain regulatory bodies, the withdrawal of your consent to do so obviously cannot be acted upon.

9. **How long will we keep your personal information?**

In the case of student or trainee records, we will hold your information indefinitely. This in your interests because it ensures that we can assist you at any time with copy certificates or information on your achievement in different subjects.

Where personal information has been retained for marketing purposes, we will hold it until such time as you request us to update it, or you opt to unsubscribe from our database.

Where we have served you in other ways, ie consulting work of some kind, or the provision of specialized training projects, we will keep your personal information for as long as you remain a client of ITRISA. After you have ceased to be a client of ours, we may keep your data on record for a further five years to enable us to respond to any queries you may have, or further assistance you may require, following the completion of the project concerned.

We may keep your data for longer than five years for research or statistical purposes in which case, we will ensure that your privacy is protected and your data used only for the purpose intended.

10. **Your ‘data subject’ rights**

You are entitled to know what we know about you, and what we do with that information.

Where applicable, you thus have the right to:
i) query the information we hold on you, as well as how and when it was collected
ii) have inaccurate or incomplete information corrected/completed
iii) object to our processing of your personal information
iv) request access to the information that we hold on you
v) request that we delete your personal information from our records
vi) query the personal information of yours that we have shared with our sub-contracted service providers
vii) request that we restrict our use of your personal information
viii) unsubscribe from any direct marketing newsletters or promotional material that you might receive from us
ix) lodge a complaint with the Information Regulator.

To exercise your rights, please contact us at info@itrisa.co.za with your request and where legally possible, we will action it.

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