

# STADIO



## HIGHER EDUCATION

### STADIO Privacy Policy

#### 1. Introduction and Scope

STADIO (Pty) Ltd (otherwise known as “STADIO” or “STADIO Higher Education”) is committed to protecting your privacy and ensuring that your personal information is processed lawfully, transparently, and securely.

This policy outlines how we collect, process, store, and share your personal information, as well as your rights in relation to your data. It applies to all applicants, students, alumni, research participants, employees, employment candidates, visitors and users of STADIO services.

#### 2. Collection and Processing of Personal Information

To administer your application and provide academic and related services, STADIO processes personal information including, but not limited to:

- Identifying information;
- Contact information (including address);
- Demographic details;
- Academic details regarding prior learning;
- Employment details (where applicable); and
- Supporting documentation.

If your application is successful and you register as a student, we will also process information regarding your academic progress, assessment of learning, and correspondence. If you do not provide the required information, STADIO will be unable to administer your application or provide services.

#### 3. Purposes for Processing Personal Information

Your personal information may be processed for purposes related to a function or activity of STADIO, which may include one or more of the following:

- Delivering academic services (includes, but not limited to, admissions, enrolment, registration, education, engagement, validation of qualifications of both prospective students and students);
- Providing information on additional academic service offerings;
- Verifying information provided and making necessary enquiries;
- Preventing, detecting, and reporting fraudulent or criminal activities, including compliance with anti-money laundering laws;
- Complying with statutory and regulatory requirements, including storage and maintenance of documents;
- Consideration or institution of legal proceedings, as required;
- Responding to valid requests for information, including those under the Promotion of Access to Information Act (PAIA);
- Complying with requests from regulators or lawful authorities;
- Assessing customer complaints;
- Providing information about products or services which may be of interest to you;
- Enforcing and collecting payments in the event of default or breach;

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SA Du Plessis – Director | CPD Vorster | I Kula – Director | D Singh – Director |  
JJ Human – Director | AVDM Roux - Director  
Company registration number: 2004/031722/07

STADIO is registered with the Department of Higher Education and Training as a private higher education institution under the Higher Education Act, 1997. Registration Number 2008/HE07/004.

- Conducting market and behavioural research, including scoring and analysis;
- Sending direct marketing communications (with the option to opt out);
- Profiling for direct marketing purposes;
- Developing, testing, and improving products and services;
- Business analytics and research including the analysis of historical data;
- Fee payment and the collections of any due or overdue amounts;
- Processing of payment instructions and payment collections;
- Managing and maintaining your accounts and relationship with STADIO;
- Disclosing and obtaining information from credit bureaus and other third-party data providers;
- Communicating and delivering notices or documents to you;
- Security, identification, verification and accuracy checks;
- Internal purposes such as training, monitoring, customer support and sales;
- As otherwise required or authorized by local or foreign law; and
- Any additional purposes which are in our legitimate interests, including our commercial interests of which we notify you.

#### 4. Consent and Obligations

By accepting this privacy policy, you consent to:

- STADIO and its approved representatives processing your personal information for the purposes stated above and any related purposes;
- STADIO obtaining information concerning your academic certificate and/or transcript from any school, university, regulatory body, or other educational institution previously attended, and using it to validate your qualifications;
- STADIO sharing your personal information with qualification verification agencies, who may enter your qualification information into their National Learners Register;
- STADIO sharing your personal information with third-party service providers engaged by STADIO, located in South Africa or in a foreign country, for the purposes listed above;
- being contacted with information about additional academic service offerings, with the option to opt out of further similar correspondence;
- the processing of any health information provided for the purpose of accommodating disability or sick leave;
- the processing of your personal information as needed to meet security requirements and the requirements of government, professional bodies, and other regulatory authorities; and
- the transfer of your personal information in the event of any reorganisation, merger, or acquisition of STADIO.

If you are admitted as a student of a corporate account, you consent to STADIO receiving your personal information necessary for the application and registration process from your employer.

Where it is not possible or practicable to obtain the consent of the data subject, STADIO may justify the processing of personal information on another ground, which may include one or more of the following:

- The processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;
- The processing protects a legitimate interest of the data subject;
- The processing complies with an obligation imposed by law on STADIO;
- The processing is necessary for pursuing the legitimate interests of STADIO or of a third party to whom the information is supplied.

Personal information will only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.

You undertake to provide honest, accurate, and current personal information and to update such information as necessary. You indemnify STADIO against any losses or harm resulting from reliance on inaccurate information provided by you.

### **5. Personal information relating to children**

STADIO will take additional care and caution when processing personal information relating to a child.

To the extent practicable, STADIO will only process personal information relating to a child if the processing is carried out with the prior consent of a person who is legally competent to consent to any action or decision being taken in respect of a child (for example a parent or guardian), on behalf of the child.

Where it is not possible or practicable to obtain the prior consent of a competent person, STADIO will only process such personal information if one or more of the following is applicable:

- The processing is necessary for the establishment, exercise or defence of a right or obligation in law;
- The processing pertains to personal information that has deliberately been made public by the child with the consent of a competent person;
- The processing
  - is for historical, statistical or research purposes, to the extent that the purpose serves a public interest and the processing is necessary for the purpose concerned; or
  - it appears to be impossible or would involve a disproportionate effort to ask for consent, or
  - there are sufficient guarantees to ensure that the processing does not adversely affect the individual privacy of the child to a disproportionate extent.

### **6. Data Sharing and International Transfers**

From time to time, STADIO may make use of operators who process personal information for STADIO.

In such circumstances, STADIO will enter into a written contract with any such operator to ensure that they establish and maintain the necessary security measures.

All operators are required to notify STADIO immediately where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by an unauthorised person.

Your personal information may be processed outside the borders of South Africa, subject to legal safeguards. These safeguards may include transferring and storing your personal information in a country with equivalent or better data protection legislation, or with a service provider subject to an agreement requiring compliance with data protection requirements equivalent to those in South Africa.

#### **6.1 Sharing with Third-Party Financial Service Providers**

STADIO may share your personal information with third-party financial service providers for the purposes of offering student finance solutions for STADIO programmes. This may include the assessment of your eligibility for finance, the administration of finance applications, and the provision of related services.

#### **6.2 Sharing with Credit Bureaus and Other Third-Party Data Providers for Product and Service Development**

STADIO may share your personal information with registered credit bureaus and other third-party data providers for the purposes of developing new products and services. This may include the analysis of aggregated or individual data to identify trends, improve existing offerings, and design new solutions relevant to students and applicants.

#### **6.3 Sharing with Credit Bureaus for Non-Credit Related Purposes**

STADIO may share your personal information with registered credit bureaus, for purposes not related to the provision of consumer credit, including but not limited to the analysis of applicant and student demographics, credit activity, and affordability for the development of new products and services. In accordance with the National Credit Act and its regulations, STADIO will only share such information with your explicit, informed consent, which you provide by accepting this privacy policy.

You have the right to object to the processing of your personal information for the purposes of analysis and product development by credit bureaus and third-party data providers, and you may withdraw your consent at any time. Exercising this right will not affect your application or registration status.

### **6.4 Data Minimisation and Anonymisation Assurance**

STADIO will use reasonable efforts to ensure that only the minimum necessary personal information is shared with credit bureaus and third-party data providers for the specified purposes. Where possible, information will be anonymised or aggregated to protect your privacy, and STADIO will use reasonable efforts to require that any third party receiving such information returns only aggregate, anonymised data to STADIO.

### **7. Automated Processing and Profiling**

STADIO may process your information using automated means (without human intervention in the decision-making process) to make decisions about you or any application for a STADIO product or service. You may request more information and make representations about the process.

STADIO may use Artificial Intelligence (AI) technologies to enhance our services, improve operational efficiency, and provide personalised experiences. These technologies may include automated decision-making, natural language processing, predictive analytics, and machine learning.

- In certain cases, some decisions are made using automated processes. You may request human review or intervention, where applicable;
- AI systems may process personal information collected directly from you or from publicly available sources. STADIO ensures that only data necessary for the intended purpose is used, and that it is processed lawfully, fairly, and transparently;
- STADIO is committed to ensuring that our AI systems are designed and monitored to prevent unfair bias and discrimination and strives to make AI-driven decisions explainable and understandable. You may request further information about how such decisions are made.

Where we use third-party AI tools or platforms, we ensure that these providers comply with applicable data protection laws and contractual safeguards are in place to protect your personal information.

### **8. Data Subject Rights**

You have the following rights regarding your personal information:

- The right to access the information that STADIO holds about you;
- The right to request correction, destruction, or deletion of your information where necessary;
- The right to object to the processing of your personal information;
- The right to request deletion of your personal information if STADIO is no longer authorised to process it (note: this may result in suspension of services);
- The right to lodge a complaint with the Information Regulator if you believe your information has been processed contrary to applicable law.

Any such request should be directed to the designated authority identified in terms of this policy.

STADIO will always verify the identity of anyone making a data subject access request before providing any personal information.

STADIO is entitled to refuse a request on any grounds set out in terms of Chapter 4 of Part 3 of PAIA.

### **9. Direct Marketing**

STADIO may send you direct marketing about products and services which may be of interest to you. You may unsubscribe (opt out) at any time by sending an email to [support@stadio.ac.za](mailto:support@stadio.ac.za).

### **10. Security and Retention.**

STADIO uses reasonable efforts to ensure that your personal information is stored securely. Any personal information supplied to STADIO is provided voluntarily, and failure to provide required information may result in STADIO being unable to fulfil its obligations or provide services.

The security of your personal information is of utmost importance and STADIO takes all reasonable measures to safeguard the information you provide to us and to prevent destruction, unlawful access and loss of personal information.

STADIO identifies all reasonably foreseeable internal and external risks to personal information in its possession or under its control, establishes and maintains appropriate safeguards against the risks identified, regularly verifies that the safeguards are effectively implemented, and ensures that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

### **11. Contact Information**

If you wish to exercise any of your rights, or require more information, you can contact STADIO at [informationofficer@stadio.ac.za](mailto:informationofficer@stadio.ac.za).

For complaints, you may contact the Information Regulator at the contact details available at <https://inforegulator.org.za/contact-us/>

### **12. Declaration**

By accepting this privacy policy, or providing personal information to STADIO or its representatives, you consent to the processing thereof as set out in this privacy policy and certify that the information you provide is correct and complete. You understand that false or incomplete information will invalidate your application and that acceptance denotes agreement with the STADIO privacy policy and declaration.

You may withdraw your consent at any time by contacting STADIO at [informationofficer@stadio.ac.za](mailto:informationofficer@stadio.ac.za) but if you do so STADIO may not be able to offer its services to you. This will be considered on a case-by-case basis.

### **13 Enhanced Transparency for Applicants Who Did Not Register**

This privacy policy applies to all applicants, including those who do not subsequently register as students.

Personal information provided during the application process may be processed and shared as described herein, including for the purposes of product and service development and analysis with third-party data providers and credit bureaus.

### **14. Additional Information**

STADIO's PAIA Manual can be accessed by request at [support@stadio.ac.za](mailto:support@stadio.ac.za).

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