

1. INTRODUCTION

- 1.1. The APT Group of companies, comprising APT Holdings, Accounting Professional Training Proprietary Limited, Accounting Professional Training Specialist Courses Proprietary Limited and APT Africa Proprietary Limited (collectively referred to as "APT"), is an organisation whose mission is to develop the Professional Competence of aspirant Chartered Accountants and which provides services related to developing professional competence and preparing candidates for writing professional examinations in accounting.
- 1.2. APT is obliged to comply with The Protection of Personal Information Act ('POPI').
- 1.3. POPI requires APT to inform candidates as to how their Personal Information is used, disclosed and destroyed.
- 1.4. APT guarantees its commitment to protecting candidates' privacy and ensuring that their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.
- 1.5. This Policy sets out how APT deals with candidates' Personal Information and, in addition, the purposes said information is used for. This Policy is made available on our websites and by request from our Information Officer, whose details are provided in this document.
- 1.6. Section 9 of POPI states that "Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive."

2. THE PERSONAL INFORMATION COLLECTED

- 2.1. APT collects and processes candidates Personal Information pertaining to candidates' Professional Competence as aspirant Chartered Accountants. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform candidates what information they are required to provide us with and what information is optional. Examples of the Personal Information we collect includes but is not limited to:
 - Candidates identity number, name, surname, addresses, postal code and employment details;
 - Description of candidates previous academic records; and
 - Any other information required by us and Professional Institutes and Regulators in order to provide candidates with appropriate information to facilitate Professional Development and assess needs for further development.
- 2.2. For purposes of this Policy, candidates include potential, past and existing candidates.

3. HOW PERSONAL INFORMATION IS USED

- 3.1. Candidates' Personal Information will only be used for the purpose for which it was collected and intended. This would include:
 - 3.1.1. Providing products or services to candidates for the purposes of developing and facilitating candidates' Professional Development and their acquisition of the qualities and skills required of a CA (SA).
 - 3.1.2. Providing information to Professional Institutes and Regulators.
 - 3.1.3. Providing information to employer firms who are responsible for the payment of candidates' fees.
 - 3.1.4. Enabling APT to assess candidates' further development needs;
 - 3.1.5. For audit and record keeping purposes;
 - 3.1.6. In connection with legal proceedings;
 - 3.1.7. Providing our services to candidates to carry out services requested and to maintain and constantly improve relationships;
 - 3.1.8. Providing communications in respect of APT and regulatory matters that may affect candidates; and
 - 3.1.9. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- 3.2. According to Section 10 of POPI, Personal Information may only be processed if certain conditions are met for APT processing the Personal Information. These are listed below:
 - 3.2.1. Candidate consents to the processing – consent is obtained from candidates during registration;
 - 3.2.2. Processing is necessary – Personal information is required to facilitate the provision of services to candidates;
 - 3.2.3. Processing complies with an obligation imposed by law on APT;
 - 3.2.4. Processing protects a legitimate interest of the candidate – it is in candidates' best interests to have access to full and appropriate services;
 - 3.2.5. Processing is necessary for pursuing the legitimate interests of APT – in order to provide our candidates with services, we need certain Personal Information from candidates.

4. DISCLOSURE OF PERSONAL INFORMATION

- 4.1. We may share candidates' Personal Information with, and obtain information about candidates from third parties for the reasons already discussed in 3.1 and 3.2 above.
- 4.2. We may also disclose candidates' information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

5. SAFEGUARDING CANDIDATES INFORMATION

- 5.1. It is a requirement of POPI to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. We continuously review our security controls and processes to ensure that your Personal Information is secure.
- 5.2. The following procedures are in place in order to protect your Personal Information:
 - 5.2.1. A third party service provider is mandated to ensure the safeguarding of candidates' Personal Information;
 - 5.2.2. Recommendations made by them are actioned;
 - 5.2.3. The APT Information Officer is Peter John Maurice Bourne, whose details are available below and who is responsible for the encouragement of compliance with the conditions of the lawful processing of Personal Information and other provisions of POPI;
 - 5.2.4. This policy is in place throughout APT and training on this policy and the POPI Act will take place during November 2014 by the Information Officer;
 - 5.2.5. Employees are required to sign Confidentiality Agreements which are considered annexures to their Employment Contracts;
 - 5.2.6. Archived candidate information is stored at third party providers who are also governed by POPI and with whom APT has Service Level Agreements;
 - 5.2.7. Hard copy files are stored at secure premises and are destroyed after 3 years;
 - 5.2.8. APT's internal server hard drives are protected by firewalls;
 - 5.2.9. A Security Incident Management Register will be kept to log any security incidents and to report on and manage said incidents. This register will be maintained by the Information Officer;
 - 5.2.10. A Procedures Manual has been drafted and will be implemented by 31 December 2014 to ensure that all employees follow APT's Professional Procedures to ensure candidate information is processed accurately and securely; and
 - 5.2.11. Consent to process client information is obtained from candidates (or a person who is authorised by the client to provide the candidates' Personal Information) during registration.

6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- 6.1. Candidates have the right to request access to the Personal Information we hold about them.
- 6.2. Candidates also have the right to ask us to update, correct or delete their Personal Information on reasonable grounds.
- 6.3. Once a candidate objects to the processing of their Personal Information, APT may no longer process said Personal Information.
- 6.4. The details of our Information Officer and Head Office are as follows:
 - 6.4.1. Information Officer Details
 - Name: Peter John Maurice Bourne
 - Telephone Number: 021 761 3468
 - Fax Number: 086 219 0881
 - Postal Address: P.O. Box 480, Plumstead 7801
 - Physical Address: 97-99 Gabriel Road, Plumstead 7800
 - E-Mail Address: pbourne@mweb.co.za
 - 6.4.2. Head Office Details
 - Telephone Number: 021 761 3468
 - Fax Number: 086 219 0881
 - Postal Address: P.O. Box 480, Plumstead 7801
 - Physical Address: 97-99 Gabriel Road, Plumstead 7800
 - Websites:
 - <http://www.apt.co.za>
 - <http://www.aptassist-apcprogramme.co.za/portal>
 - <http://aptassist.co.za/portal>

7. AMENDMENTS TO THIS POLICY

- 7.1. Amendments to this Policy will take place on an ad hoc basis or at least once a year.
- 7.2. Candidates are advised to check our websites periodically to inform themselves of any changes.
- 7.3. Where material changes take place candidates will be notified directly.

8. COOKIES

- 8.1. We use cookies and other techniques such as web beacons when you visit our website. "Cookies" are small text files used by us to recognise repeat users, facilitate your ongoing access to and use of our website and allow us to track your usage behaviour and compile aggregate data that will allow us to improve the functionality of our website and content. "Web beacons" are small, clear picture files used to follow your movements on our website. For example, storing your preferred settings for the next time you visit.
- 8.2. The information we collect from cookies enables us to:
 - tailor our websites to your personal needs;
 - remember the notifications that you have been shown so that you are not shown them again;
 - help us find information once you have logged in;
 - help us link your browsing information to you and your personal information, for example, when you choose to register for a service;
 - make improvements and updates to our websites based on the way you want to use them; and
 - we generally do not use cookies to identify you personally.
- 8.3. The type of information collected by cookies is not used to personally identify you.
- 8.4. We use the following categories of cookies:
 - 8.4.1. Category 1: Necessary cookies
Necessary cookies enable you to use our websites and all their features, such as enabling access to secure areas of the website. Without these cookies, you may not be able to use all the features of our websites.
 - 8.4.2. Category 2: Performance cookies
Performance cookies collect information about how you use our websites so we can improve them for you in future. For example, they collect information on which pages you visit most often and any error messages you may get. The information collected by these cookies is anonymous. They do not collect any information that can identify you personally.
 - 8.4.3. Category 3: Functionality cookies
Functionality cookies enable us to provide you with a more personalized experience. They help us to remember data, such as your username and language preference, to save you having to enter them again the next time you visit. The information these cookies collect is anonymous. They cannot track your browsing activity on other websites.
 - 8.4.4. Category 4: Targeting/advertising cookies
We and our service providers may use advertising cookies to deliver ads that we believe are relevant to you and your interests.
For example, we may use targeting or advertising cookies to customize the advertising and content you receive on our websites, to limit the number of times you see the same ad on our websites and to help measure the effectiveness of our advertising campaigns.
 - 8.4.5. Category 5: Social media cookies
Our websites use third-party cookies from social media sites such as Facebook, Twitter and LinkedIn to enable in-depth campaign reporting and to track social network users when they visit our websites, by using a tagging mechanism provided by those social networks. These cookies can also be used for event tracking and remarketing purposes. Any data collected with these tags will be used following our privacy policy and with the social network's privacy policies. Our websites will not collect or store any personally identifiable information from the user.
 - 8.4.6. How Can You Manage Your Cookie Settings?
 - To ensure you get the best possible experience when visiting our websites, we recommend that you accept cookies. However, you can opt-out of each cookie category (except strictly necessary cookies) by clicking on the "cookie settings" button or disable cookies in your web browser.
 - Cookies may, however, be necessary to provide you with certain features available on our website. If you disable cookies you may not be able to use these features, and your access to our website will be limited. Candidates are advised to check our websites periodically to inform themselves of any changes.
 - Where material changes take place candidates will be notified directly.