



## 1. About Us

Gradesmatch is an educational technology company that primarily provides career guidance, university/college preparation, and student success services to students in Africa. At Gradesmatch, we believe that solving structural unemployment, high drop-out rates, and education finance shortfalls is possible through a data-driven ecosystem solution; hence we developed the Gradesmatch platform. Our Gradesmatch ecosystem provides student-wrap-around services ranging from tutoring, psychosocial support, and academic resources to ensure student success and meaningful post-graduation employment. Ultimately, we have built infrastructure that enables the journey from education to an economic opportunity for youth in Africa. This document is a POPI notice for our BridgeOne wrap-around platform.

## 2. Details of the Information Regulator

Should you believe that the processing of your personal information is in contravention of applicable data protection laws, you can lodge a complaint with:

The Information Regulator (South Africa): <https://info regulator.org.za/>

## 3. Aim and Purpose of this Notice

Gradesmatch respects your privacy and recognises the importance of protecting your personal information. As a result, all Personal Information attained through Gradesmatch BridgeOne and through other internal processes is collected/verified, securely stored, and further processed in accordance with the Protection of Personal Information Act No 4, 2013 (POPIA).

Gradesmatch acknowledges and agrees that your Personal Information will not, under any circumstances, be processed for purposes prohibited by POPIA and/or the principles contained in POPIA and that the processing of Personal Information will be done fairly and in accordance with legal provisions, given that the purpose for which processing of the Personal Information is adequate, relevant, and not excessive.

Processing shall include the receipt, recording, organising, collation, storage, updating or modification, retrieval, alteration, consultation and use; the dissemination by means of transmission, distribution or making available in any other form, or the merging, linking as well as blocking, degradation, erasure or destruction of information, as described by POPIA.

Gradesmatch has, therefore, put the necessary procedures in place to safeguard Personal Information and to remain compliant with the conditions as stipulated by POPIA for lawful processing.



## 4. Why we Collect and Process your Personal Information:

Our reason for collecting your personal information changes depending on the activity we need it for. We collect and process personal information for the following purposes including but not limited to:

4.1. Facilitate the application, verification and selection of students for funding opportunities; Supporting students with university wrap-around Service; Research academic performance trends and Research Family Household income data for the purposes of identifying education funding gaps. Data processing for such services includes, but not limited to below:

4.1.1. Identity Document verification.

4.1.2. Household Income Verification.

4.1.3. Qualifications, Academic results and registration confirmation verification.

4.2. Provide Financial, Psychosocial and Academic Support to the Student .

4.3. Fulfil internal and external reporting which includes Audit requirements for Gradesmatch and linked Funders.

4.4. Process Payment Transactions to students or on behalf of the student to various Suppliers.

4.5. Other activities in relation to a contractual agreement with the student, the Funder, Supplier or Service Provider and any applicable regulations as permissible by Law.

4.6. Managing relationships with all our stakeholders (Students, Funders, Suppliers, Service Providers).

4.7. Managing relationships with all employees, including the Board and various committees.



## 5. Personal Information Collected and Processed:

Personal Information is information which relates to an identified or identifiable natural person or a juristic person, by means of an identifying factor and subject to the applicable data protection laws. The personal information we collect, and process may differ depending on our purpose of collecting and processing your personal information. We may collect and process your personal information subject to the purpose above, which include but are not limited to:

### Personal Information

- Full name and identifying details (including identity or passport numbers)
- Contact details, including telephone numbers, email addresses etc.
- Gender
- Employment details and history, qualifications, and designations
- Educational details, including student number, educational establishment, dates of study, subject studied, exam results, student training records, academic results, academic status, and financial data\transactions
- Complaints and disciplinary records
- Contact Details, including but not limited to telephone number, email address, physical address, postal address etc.
- Income tax numbers, VAT numbers, Company details, Bank account details

### Special Personal Details

- Race or ethnic origin, Health, Mental Health, Disability, Criminal behaviour,  
Biometric, Personal information of children



## 6. Who may have Access to your Personal Information:

Our employees will have access to your personal information for the administration and management of services and various stakeholder relationships. Your personal information may further be shared with third parties for verification, auditing, and reporting purposes, subject to the purpose of us collecting and processing your information, including but not limited to:

- 6.1 Operators, who process personal information for us internally and externally in terms of a contract or mandate, without coming under our direct authority e.g. service providers etc;
- 6.2 Oversight and other regulators, professional bodies and statutory bodies;
- 6.3 Our Board and sub-Board Committees;
- 6.4 Other Committee members;
- 6.5 Linked Funder\’s and managing agencies;
- 6.6 Universities, colleges, or similar entities;
- 6.7 Reciprocal entities;
- 6.8 Potential clients, should you be registered on our platform, and
- 6.9 Government agencies and law enforcement.

## 7. Transfer of Personal Information to Third Countries:

This refers to the transfer of Personal Information Outside of the European Economic Area (“EEA”) in terms of the GDPR or Outside of the Republic of South Africa (“RSA”) in terms of the POPIA. We may transfer your personal information to Funders who are located in countries outside of the EEA or RSA, with the aim to only transfer your personal information under such circumstances if the relevant third country or international organisation provide a similar and/or adequate level of protection of personal information as outlined in POPIA and GDPR.

In the event in which we transfer your personal information to a country where the data privacy laws are not equivalent to those in the EEA or RSA, we will take all necessary steps to protect your personal information in accordance with applicable data privacy laws.



## 8. Protection and Retention of your Personal Information:

We will take the necessary steps to secure the integrity and confidentiality of personal information in our possession and under our control by taking appropriate, reasonable technical and organisation measures to prevent loss of damage to or unauthorised destruction of your personal information and unlawful access to or processing of personal information, regardless of the format in which it is held.

We will retain your personal information for a period as required to achieve the purpose for which the personal information was initially collected or subsequently processed unless further retention is required or authorised by applicable law, or we reasonably require the records for lawful purposes related to our functions or activities, or to meet requirements stipulated in a contract or you (or a competent person where you are a child) have given appropriate consent for the retention of a record.

We may retain your personal information for periods longer than these periods for historical, statistical or research purposes based on us maintaining appropriate safeguards against the records being used for any other purposes.

In the event in which we used your personal information record to make a decision about you, we shall retain the record for such a period that may be required or prescribed by law or code of conduct or if there is no law pertaining to the retention of the record, retain the record for a period sufficient to afford you a reasonable opportunity, taking all considerations relating to the use of the personal information into account, to request access to the record.

## 9. Your Rights:

POPIA guarantees you, as a data subject, certain rights which you may exercise against us where applicable.

You have the right to:

- 9.1 Be notified that your personal information is being collected;
- 9.2 Be notified that your personal information has been accessed or acquired by an unauthorised person;
- 9.3 Request confirmation on whether we hold personal information about you;
- 9.4 Request for the record or a description of the personal information we hold about you, including information about the identity of all the third parties or categories of third parties who have or have had access to your information;
- 9.5 Request for us to correct/modify or delete your Personal Information in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or destroy or delete a record of your Personal Information if we are no longer authorised to retain it;



9.6 Object to the processing of your personal information, subject to the relevant lawful purpose of processing, on reasonable grounds relating to your particular situation;

9.7 Object to the processing of personal information for the purposes of direct marketing;

9.8 Request that the processing of your personal information is restricted under certain circumstances, subject to applicable law; and

9.9 Request that our personal information be transferred to another Responsible Party, subject to applicable law.

For any other requests regarding access to information, whether created by Gradesmatch or under our control, you can complete the request form accessible on this website through your account or email us at [protectpidata@gradesmatch.co.za](mailto:protectpidata@gradesmatch.co.za).