Privacy Notice — Students, Applicants and Customers

How S. Buys Academy (Pty) Ltd. collects and uses the personal information of learners, applicants, payers, nominated persons and pharmacy customers — issued under section 18 of the Protection of Personal Information Act 4 of 2013

Responsible party	S. Buys Academy (Pty) Ltd., registration number 2001/023449/07 S. Buys Business Park, 126 Kaolin Street, Carletonville, 2499 | Tel 018 788 2102 | shtraining@sparhealth.co.za
Information Officer	Estelle Victor | Estelle.Victor@sparhealth.co.za | 018 788 2102 Deputy Information Officer: Jalia Meyer | Jalia.Meyer@sparhealth.co.za
Information Regulator registration	2024-015694 (registered 21 June 2024)
Applies to	Applicants and learners on every Academy course; persons responsible for payment; persons nominated by a learner to act on their behalf; pharmacies, facilities and their contact persons who order Academy products or host learner placements
Where you will find this notice	As an insert in every application pack; as a PDF link on the online application form and on www.sparhealth.co.za/academy/; from the Academy on request

1. Who we are and why you are reading this

S. Buys Academy (Pty) Ltd. ("the Academy", "we") is a private training provider accredited by the South African Pharmacy Council (SAPC) and the Quality Council for Trades and Occupations (QCTO). We train pharmacist's assistants, dispensing healthcare professionals and medicine-in-transit drivers, and we supply the Accredit It and Clinic It manuals to pharmacies and clinics. The Academy is part of the SPAR Health Group and shares administrative services (finance, IT and human resources) with other companies in the group.

To do this work we must collect and use personal information. POPIA requires us to tell you, before or as soon as possible after we collect your information, what we collect, why, who receives it and what your rights are. This notice does that. It applies to you if you apply for or attend an Academy course, pay for a learner's course, are nominated by a learner to act on their behalf, or order an Academy product or host a learner placement on behalf of a pharmacy or facility.

Applicants must be 18 years or older. The Academy does not enrol children.

2. The information we collect

Who you are	What we collect	Where it comes from
Applicant or learner	Identity: title, names, ID or passport number, a certified copy of your ID document, a colour photograph (for SAPC registration) and, if you are a foreign learner, your study permit. Contact: telephone numbers, e-mail, residential and postal address, courier address. Background: qualifications and certified copies of certificates, professional body registration numbers (SAPC, HPCSA, SANC), practice number, occupation, current employer and sector, whether you work in a pharmacy and which one. Equity information: gender and race (see section 4). Your studies: enrolment, attendance, assignments, assessments and results, placement records, learning-platform activity, certificates issued, correspondence and call notes. Payment: payment option chosen, invoices, proof of payment, account balance and payment history. Placement preferences: nominated pharmacies and alternative towns.	Mainly from you, on the application pack and during the course. Also from the SAPC and QCTO (registration and examination results), your employer or funder, the pharmacies where you are placed, our learning platform (activity records), and SPAR Health Wholesaler Carletonville (account status, for a discount).
Person responsible for payment (if not the learner)	Names, ID number, contact details and signature on the acknowledgement of debt; if you pay by debit order, your bank, branch, account number and type, a confirmation letter from your bank and the debit date.	From you, or from the learner who supplies your details. The learner must show you this notice.
Nominated person (power of attorney)	Full names, ID number and telephone number, and the matters you may deal with on the learner's behalf.	From the learner, who confirms that you have agreed. The learner must show you this notice.
Pharmacy or facility customer or placement host	Name and SAPC registration number of the pharmacy or facility, company registration and VAT numbers, addresses, SPAR Health Wholesaler Carletonville account number, Aptekor Wholesale account number, inspection date, and the names and contact details of the owner, responsible pharmacist or nurse, contact and delivery persons.	From the person who completes the order form or arranges the placement, and from the SAPC's public register.

3. Why we use your information and on what legal basis

Purpose	Legal basis under POPIA
Assessing your application and enrolling you; providing the course, learning material, placements, assessments and certificates; keeping your academic record	Performance of the contract between you and the Academy — s.11(1)(b)
Registering you with the SAPC as a learner pharmacist's assistant and paying the SAPC fee on your behalf; reporting enrolments, results and certification to the SAPC, the QCTO and the HWSETA; keeping the records these bodies require	Compliance with legal obligations under the Pharmacy Act 53 of 1974, the Skills Development Act 97 of 1998, the National Qualifications Framework Act 67 of 2008 and the rules of the SAPC and QCTO — s.11(1)(c)
Invoicing, collecting course fees and debit orders, issuing refunds, keeping accounting and tax records	Contract — s.11(1)(b); legal obligation under the Companies Act, the Tax Administration Act and the VAT Act — s.11(1)(c)

Purpose	Legal basis under POPIA
Reporting your progress to your employer, coordinator or funder where they pay for or sponsor your course	Contract — s.11(1)(b); the Academy's and the funder's legitimate interests — s.11(1)(f)
Verifying the authenticity of certificates; preventing and reporting fraud; recovering unpaid fees	Legitimate interests of the Academy, the profession and the public — s.11(1)(f); legal obligation where the law requires a report — s.11(1)(c)
Dealing with a person you have nominated to act for you	Your consent, given on the power of attorney — s.11(1)(a)
Customising and delivering the Accredit It and Clinic It manuals and sending update notifications for a manual you have bought	Contract — s.11(1)(b); s.69(3) for update notifications to existing customers about similar products
Sending you marketing about new courses and products	Your consent, given by ticking the opt-in box — s.11(1)(a) and s.69(2)
Quality assurance, accreditation audits and inspections by the SAPC, QCTO and HWSETA	Legal obligation — s.11(1)(c)

We do not make decisions about you by automated means alone, and we do not sell your information.

4. Gender and race

The QCTO requires accredited providers to report the gender and race of learners so that it can report to the Minister of Higher Education on access to occupational qualifications. The SAPC may also request this information for the Dispensing and Medicine in Transit courses. Race is special personal information under POPIA. We process it only for this purpose, under section 29(b) read with section 27(1)(c) of POPIA (compliance with laws designed to protect and advance persons disadvantaged by unfair discrimination), report it in the aggregated or individual form the QCTO prescribes, and do not use it for any decision about your application. We do not collect race or gender from pharmacy customers.

5. Mandatory and voluntary information

Information marked on the application pack as required is mandatory: without your identity details, certified copies, contact details, qualifications and payment arrangements we cannot register you with the SAPC, enrol you or issue a certificate, and your application cannot be processed. Your study permit is mandatory only if you are not a South African citizen or permanent resident. The marketing opt-in, the power of attorney, the SPAR Health Wholesaler Carletonville account number, placement preferences and lab-coat and USB choices are voluntary; leaving them out has no effect on your application except that we cannot act on what you have not told us.

6. Who receives your information

We share your information only with the following recipients, and only as much as each one needs:

Recipient	What and why
South African Pharmacy Council (SAPC)	Registration form, photograph, certified copies, fees, enrolment, results and certification — statutory registration of learners and accreditation of the Academy
Quality Council for Trades and Occupations (QCTO) and SAQA	Learner enrolment, equity data, results and certification — statutory reporting and the National Learners' Records Database
Health and Welfare SETA (HWSETA)	Learner and placement records during inspections and verification visits, acting as inspectorate for the QCTO

Recipient	What and why
Your employer, coordinator or funder	Enrolment, attendance and progress — only where they pay for or sponsor your course, or where you have asked us to report to them
Placement pharmacies and facilities	Your name, contact details and placement requirements — to arrange your work-experience hours
SAP Litmos (learning-management platform) and PVG (e-learning platform and hosting services)	Your name, e-mail and course activity — to give you access to the e-learning platform; these providers act as our operators under written agreements
Google (online application form)	The details you enter on the online application form — collected and stored by Google on our behalf
Courier service	Your name, courier address and telephone number — to deliver your starter pack or manual
Banks and payment processors	Debit order instructions and payments
Companies in the SPAR Health Group providing shared services (S Buys (Pty) Ltd finance, IT and HR)	Invoicing, accounts, IT systems and e-mail — under the group's shared-services arrangements
Attorneys, collection agents, auditors and insurers	Where needed to recover unpaid fees, audit our records or deal with a claim
LexibEntra (operated by Pro-Host, United Kingdom)	Only if an account is handed over for collection — see section 7
SAPC and the South African Police Service	Where a certificate submitted to us is found to be forged or fraudulent
The person you nominate under the power of attorney	Account, financial and academic information you have authorised them to request
Regulators and courts	Where the law requires or a court orders disclosure

7. Transfers outside South Africa

Our e-learning platform (SAP Litmos, hosted in the European Union) and the online application form (Google Forms) store information on servers outside South Africa; the hosting of the PVG platform is being confirmed; the group's Microsoft 365 e-mail and document services are hosted in Microsoft's South African data centres. An account handed over for collection is managed on the LexibEntra collection platform, hosted in the United Kingdom. Where information does leave South Africa we rely on section 72(1)(a) of POPIA: the recipient is bound by a written agreement or binding rules that give your information protection substantially similar to POPIA, including the condition that it may not be passed on without the same protection. The group keeps a register of every such transfer and assesses each one before it is used.

8. How long we keep your information

We keep your information only as long as the purpose requires or the law allows, and then destroy it or de-identify it. The periods below apply to the Academy's records and are reviewed once a year; when they change, this notice is updated:

Record	Retention period	Reason
Academic record: enrolment, results, certificates issued, placement completion	Permanently (minimum 30 years after certification)	The SAPC, QCTO and employers verify your qualification throughout your working life; the QCTO requires providers to keep learner achievement records

Record	Retention period	Reason
Certified copies of ID documents and certificates, photographs, study permits	Until registration and certification are complete, and no longer than 5 years after your course ends	Needed for SAPC registration and verification only
Unsuccessful, withdrawn or incomplete applications	6 months after the intake closes	Allows for queries, then destroyed (incomplete applications without proof of payment are discarded)
Acknowledgements of debt, invoices, payments, debit order authorities and bank letters	5 years after the last payment (7 years for accounting records under the Companies Act)	Tax Administration Act s.29; Companies Act s.24; recovery of unpaid fees
Power of attorney	Duration of your enrolment, then 1 year	Until the matters it covers are closed
Customer order forms and delivery records	5 years after the last order	Accounting records and manual-update notifications
Marketing consent records	For as long as you remain opted in, and 3 years after you opt out	To prove consent and honour your opt-out
Call notes and routine correspondence	2 years	Operational queries

9. How we protect your information

We keep your information on access-controlled systems and in locked storage at the Academy, limit access to staff who need it for their work, bind our staff to confidentiality, require our operators to protect your information under written agreements, and follow the SPAR Health Group's information security, clean-desk and breach-response procedures. If a security compromise affects your information we will notify the Information Regulator and, where required by section 22 of POPIA, you.

10. Your rights

You have the right to:

- **know** what personal information we hold about you and who has had access to it, and to receive a copy — a request is made under the Promotion of Access to Information Act on the form in our PAIA manual, available from the Information Officer and on our website;
- **correct or complete** information that is inaccurate, irrelevant, out of date or misleading, and to ask us to destroy or delete information we are no longer entitled to keep;
- **object**, on reasonable grounds relating to your particular situation, to processing we carry out on the basis of legitimate interests, and to object at any time to direct marketing;
- **withdraw consent** where our processing is based on it (marketing; the power of attorney), without affecting processing already done;
- **not be subject** to a decision based solely on automated processing that has legal or similarly significant effects — we make no such decisions;
- **complain** to the Information Regulator if you believe we have processed your information unlawfully: Information Regulator (South Africa), JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001; POPIAComplaints@inforegulator.org.za; 010 023 5200; www.inforegulator.org.za.

To exercise any of these rights, or to ask a question about this notice, contact the Information Officer at the details on the first page. We will respond within a reasonable time and in any event within the periods PAIA and POPIA set. We may ask you to prove your identity before we act on a request. Please also tell us within five working days if your contact details change.

11. Changes to this notice

We review this notice at least once a year and whenever our processing changes. The current version is available from the Academy and on www.sparhealth.co.za/academy/; the version number and date appear below. Where a change affects you materially we will tell you directly.

Version	v1.2 — approved text
Approved by	Estelle Victor, Information Officer — 19 November 2026 (approval of the tracked-changes v1.0; v1.2 consolidates those changes and the Academy's contact details)
Effective date	The date of approval; the forms are re-issued with Annexure A from that date
Next review	Twelve months after approval, or earlier if the processing changes

Annexure A — Standard wording for the Academy's forms

The paragraphs below replace the current declaration clauses in the course application forms (Dispensing, Medicine in Transit) and the order forms (Accredit It, Clinic It), and are inserted in the Pharmacist's Assistant administration packs, which currently carry no privacy wording. Each form refers to this notice; the notice is the single place where the detail is kept up to date.

A1 — Course application forms and Pharmacist's Assistant administration packs (replaces the "Section 15" consent clause)

> **How the Academy uses your personal information.** S. Buys Academy (Pty) Ltd. collects the information on this form, and the information generated during your course, to assess your application, enrol you, register you with the South African Pharmacy Council, deliver the course, assess and certify you, and report to the SAPC, the QCTO and the HWSETA as the law requires. We process it because it is necessary for your enrolment contract and to comply with our legal obligations, not on the basis of your consent. We share it only with the recipients listed in our Privacy Notice for Students, Applicants and Customers, which also explains how long we keep it and your rights, including the right to complain to the Information Regulator. The notice is attached to this pack / available at www.sparhealth.co.za/academy/ and from the Information Officer, Estelle Victor, Estelle.Victor@sparhealth.co.za. If someone else pays for your course or you nominate a person to act for you, please show them the notice. I confirm that I have read the Privacy Notice and that the information I have given is true and complete. Signature: _____ Date: _____

A2 — Gender and race fields (course and PA forms only; delete from order forms)

> **Why we ask for your gender and race.** The Quality Council for Trades and Occupations requires accredited providers to report learners' gender and race so that it can report to the Minister on access to occupational qualifications; the SAPC may also request it. We use this information for that reporting only and never to decide on your application. See section 4 of the Privacy Notice.

A3 — Marketing opt-in (replaces "may / may not — tick the relevant box")

> ☐ Yes, the Academy may send me information about new courses and products by e-mail. I can unsubscribe at any time using the link in each e-mail or by writing to shtraining@sparhealth.co.za. (If you do not tick the box we will not send you marketing. Customers who have bought a manual will still receive notices of updates to that manual.)

A4 — Power of attorney section (PA packs) — add below the existing text

> The person you nominate will be able to obtain your account, financial and academic information from the Academy and will be contacted if we cannot reach you. The Academy will record their name, ID number and telephone number for this purpose for the duration of your enrolment and one year thereafter. By signing you confirm that they have agreed to this and that you have shown them the Privacy Notice. You may cancel this nomination at any time by writing to the Information Officer.

A5 — Order forms for Accredit It and Clinic It manuals (replaces the "Declaration" consent clause)

> **How the Academy uses the information on this form.** S. Buys Academy (Pty) Ltd. uses the details on this order form to customise and deliver the manual, invoice the pharmacy or facility, check its SPAR Health Wholesaler Carletonville account status for a discount, and notify the contact person of updates to the manual. We process the contact persons' details because they are necessary for this order; we share them only with our courier, our group's finance and IT services and the recipients listed in our Privacy Notice for Students, Applicants and Customers, available at www.sparhealth.co.za/academy/ and from the Information Officer, Estelle Victor, Estelle.Victor@sparhealth.co.za. The person completing this form confirms that they are authorised to supply the details of the persons named on it and will make the notice available to them.