KaleidoKidz

THERAPY & LEARNING CENTRE

PRIVACY POLICY

for

Elaine Rheeder

trading as KaleidoKidz

Prepared in terms of the *Protection of Personal Information Act* 4 of 2013 and incorporating provisions contained in the *Promotion of Access to Information Act* 2 of 2000 (as amended).

Date of Compilation: 24/11/2024
Date of review: 01/10/2026

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

INDEX

1. LIST OF DEFINITIONS, ACRONYMS AND ABBREVIATIONS 3
2. INTRODUCTION 5
3. CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION 7
4. APPLICATION OF PRIVACY POLICY 8
5. TYPES OF PERSONAL INFORMATION 8
6. SPECIAL PERSONAL INFORMATION 9
7. PURPOSES OF PROCESSING AND LEGAL BASES FOR PROCESSING 10
8. PROCESSING OF SPECIAL PERSONAL INFORMATION 11
9. COLLECTION OF PERSONAL INFORMATION 12
10. UTILISATION OF PERSONAL INFORMATION 14
11. CATEGORIES OF PERSONAL INFORMATION 16
12. COMPULSORY PERSONAL INFORMATION 18
13. SHARING OF YOUR PERSONAL INFORMATION 19
14. STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION 22
15. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION 22
16. SECURITY OF DATA AND INFORMATION 23
17. RETENTION OF YOUR PERSONAL INFORMATION 25
18. MAINTENANCE OF YOUR PERSONAL INFORMATION 26
19. YOUR RIGHTS 26
20. CHANGES TO THIS PRIVACY POLICY 29
21. CHILDREN'S INFORMATION 30
22. DIRECT MARKETING 31
23. CONSUMER PROTECTION ACT AND OTHER LAWS 32
24. DATA ACCURACY 32
25. DATA MINIMISATION 33
26. COOKIES AND SIMILAR TECHNOLOGIES POLICY 33
27. GENERAL 33
28. CONTACT DETAILS OF INFORMATION OFFICER 34
29. QUERIES AND CONTACT DETAILS OF THE INFORMATION REGULATOR 34
30. LODGING A COMPLAINT 35

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

Please note:

This applies to how we collect, use and process your personal information. All of the provisions of this Privacy Policy are important, but please pay special attention to the parts that are in bold writing. These parts contain information about provisions that have special consequences for you and are only intended to bring such provisions to your attention, and, where necessary, to explain their fact, nature and effect. Where explanations are given, they may be in italics and bold writing. Such explanations are aids to understanding only and are not provisions themselves. They will be preceded by the words "Please note:". They do not limit the meaning or application of the provisions, and do not apply only to the situations and examples described or only to similar situations or examples.

1. LIST OF DEFINITIONS, ACRONYMS AND ABBREVIATIONS

1.1.	**"Associates"**	means and includes the employees, contractors, practitioners, agents and consultants of Elaine Rheeder t/a KaleidoKidz; if and when applicable;
1.2.	**"Child"**	means a natural person under the age of 18 years who is not legally competent, without the assistance of a Competent Person, to take any action or decision in respect of any matter concerning him- or herself;
1.3.	**"Competent Person"**	means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a Child, for example a parent or legal guardian;
1.4.	**"Cookie"**	means a small file that is placed on your device when you visit a website. In this Policy, a reference to a "Cookie" includes analogous technologies such as web beacons and clear Graphic Interchange Format files ("GIFs"). You may disable "cookies" by following the instructions to disable it on any of your devices;
1.5.	**"Data Subject"**	means the person to whom Personal Information relates, including you and your Child;

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

1.6. **“DIO”** Deputy Information Officer;

1.7. **“IO“** Information Officer;

1.8. **“KaleidoKidz”** KaleidoKidz – trading name;

1.9. **“Minister”** Minister of Justice and Correctional Services;

1.10. **“Operator”** means a person who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party;

1.11. **“PAIA”** *Promotion of Access to Information Act*, 2 of 2000 (as amended) (also referred to as “the Act”);

1.12. **"Personal Information"** means information relating to an identifiable, living, natural person (including a Child) and, where applicable, an identifiable, existing juristic person, as defined in section 1 of POPIA, including information about a person’s age, language, education, health, well-being, contact details, identifying numbers, opinions and private correspondence;

1.13. **“POPIA”** *Protection of Personal Information Act*, 4 of 2013;

1.14. **"Process"** Includes "Processing" or "Processed" means anything that is done with any Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

1.15.	**“Regulator”**	Information Regulator;
1.16.	**“Republic”**	The Republic of South Africa;
1.17.	**"Responsible Party"**	means the person who, alone or with others, determines the purpose of and means for Processing Personal Information – for purposes of this Privacy Policy it is Elaine Rheeder trading as KaleidoKidz;
1.18.	**"Special Personal Information"**	means Personal Information concerning a person’s religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour, as contemplated in section 26 of POPIA;
1.19.	**"Service Provider"**	third party providers of various services whom we, engage including, but not limited to, providers of information technology, communication, file storage, data storage, copying, printing, accounting or auditing services, counsel, experts, investigators, attorneys, legal advisors, translators, taxation consultants and our insurers and professional advisors; and
1.20.	**"Website"**	means www.kaleidokidz.co.za or our social media platforms, operated, or maintained, by us or on our behalf.

2. INTRODUCTION

2.1. **Elaine Rheeder trading as KaleidoKidz,** ("**KaleidoKidz**" or “**we**” or "**us**" or "**our**") is a sole proprietorship that provides therapeutic play, learning support, life coaching and study methods workshop services, and sells related products, from its premises at 341 Equestrian Road, Ruimsig, Roodepoort. We are a responsible party (or data controller, in some jurisdictions) in respect of your (included in the definition of “**you**” and “**your**”, is your child/ren) Personal Information defined

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

below, and Special Personal Information also defined below, which means that we determine the purpose of and means for processing your Personal Information.

2.2. As the owner of the business, June Elaine Rheeder is the Information Officer (also referred to as the Data Protection Officer) of KaleidoKidz in terms of section 55 of the *Protection of Personal Information Act* 4 of 2013 ("POPIA"), read with the definition of "head" of a private body in the *Promotion of Access to Information Act* 2 of 2000 ("PAIA"). Jacques Rheeder has been designated as Deputy Information Officer.

2.3. We are committed to protecting and respecting your privacy. We strive to ensure that our use of your Personal Information is lawful, reasonable, and relevant to our business activities, with the goal of improving our services and your experience.

2.4. You may contact our Information Officer at admin@kaleidokidz.co.za to discuss this Privacy Policy or your rights under data protection legislation applicable to you.

2.5. This Privacy Policy is available on our website and at our head office.

2.6. This Privacy Policy describes how we will treat your Personal Information whether provided by you to us or collected by us through other means when you engage with us in your ordinary use of our products and services, in providing us with your products and services, or in accessing our website.

2.7. This Privacy Policy must be read together with any other documents or agreements which may be entered into between you and us and which describe the way we collect or process your Personal Information. This will enable you to understand the way in which we will process your Personal Information. This Privacy Policy supplements such agreements and, in the event of any conflict, ambiguity or inconsistency between this Privacy Policy and any agreements, such documents shall be construed in the following order of priority:

2.7.1. this Privacy Policy; and

2.7.2. the agreements.

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

3. CONSENT TO THE PROCESSING OF YOUR PERSONAL INFORMATION

3.1 By providing us with your and / or your child's Personal Information, you: –

3.1.1 agree to the terms and conditions set out in this Privacy Policy and authorise us to retain, process, use and disseminate such information as set out herein; and

3.1.2 authorise Elaine Rheeder t/a KaleidoKidz, our staff, Service Providers and other third parties to use, disseminate and process your and /or your child's Personal Information for the purposes stated in this Policy.

3.2 Where we rely on consent, including consent to process your Child's Personal Information and Special Personal Information (such as information about your Child's health, development and well-being), we will ask for that consent specifically, in writing (usually in our client intake and consent form), from a parent or legal guardian of the Child as the Competent Person, as required by sections 11, 27 and 35 of POPIA. You may withdraw your consent at any time, as set out under the heading "Your Rights" below.

3.3 We will not use your and/or your child's Personal Information for any other purpose than that set out in this Policy and will endeavour to protect your Personal Information and that of your child, that is in our possession, from unauthorised alteration, loss, disclosure, use, dissemination, or access.

3.4 Please note that we may review and update this Policy from time to time. The latest version of this Policy is available on request, free of charge, at our offices and available on our Website. See our contact details herein below.

3.5 This Policy applies to our clients (including the children who attend our sessions and their parents or guardians), employees, contractors and all external parties with whom we interact, including but not limited to our consultants, agents, individuals, representatives of organisations, visitors to our offices and visitors to our website and social media platforms.

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

3.6 We may collect, obtain, receive, record, organise, collate, store, update, change, retrieve, read, process, use and share your Personal Information in the ways set out in this Privacy Policy. When we do one or more of these actions with the Personal Information, we are "**Processing**" your Personal Information (and "**process**" has a corresponding meaning).

3.7 If you are concerned about any aspect of this Privacy Policy as it relates to your Personal Information, please contact our Information Officer before you provide us with your Personal Information, so that we can address your concerns.

3.8 We may, where permitted or required to do so by applicable law, process your Personal Information without your knowledge or permission, if sufficient grounds of justification are present (for example, where we are required by law to report a concern about a Child's safety), and we will do so in accordance with the further provisions of this Privacy Policy.

4. APPLICATION OF PRIVACY POLICY

4.1 This Privacy Policy applies to the processing by us or on our behalf, and our successors-in-title, of the Personal Information relating to you, being a user who accesses and/or uses our website or our products and services, or a provider of products and services to us, clients, suppliers, employees, former employees, prospective employees and other data subjects that engage with us.

5. TYPES OF PERSONAL INFORMATION

5.1 We may process various types of Personal Information about you, as follows:

5.1.1 **Identity Information**, which includes information concerning your name, username or similar identifier, marital status, title, occupation, interests, date of birth, gender and legal status, as well as copies of your identity documents, photographs, identity number, registration number and your qualifications.

5.1.2 **Child and Client Information**, which includes your Child's name, date of birth, age, home language, school and grade, family and developmental

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

background, information about your Child's health, development, learning, behaviour and emotional well-being, assessment and progress reports, session notes, reports from schools, teachers, doctors and other professionals and, with your consent, photographs or video recordings made during sessions.

5.1.3 **Parental Responsibility Information**, which includes information about who holds parental responsibilities and rights in respect of a Child and, where relevant, copies of court orders, parenting plans or other documents that determine who may consent to services for, and receive information about, the Child.

5.1.4 **Contact Information**, which includes your billing addresses, delivery addresses, email addresses and telephone numbers.

5.1.5 **Financial Information**, which includes bank account details; insurance information, financial statements, tax clearance certificates, income tax and VAT registration numbers.

5.1.6 **Transaction Information**, which includes details about payments made to or received from you and company information, which may consist of financial activity.

5.1.7 **Technical Information**, to the extent applicable, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website or to use our products and services or engage with us.

6. SPECIAL PERSONAL INFORMATION

6.1 We hereby notify you that, in certain circumstances, by engaging with us, we may collect certain Special Personal Information about you. "**Special Personal Information**" refers to details about your religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life,

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

biometric information or criminal behaviour. The most common type of Special Personal Information that we process is information about the health, development and well-being of the children who attend our sessions.

6.2 The processing of Special Personal Information requires higher levels of protection. We need to have further justifications for processing Special Personal Information. We have implemented appropriate policies and safeguards, which we are required by law to maintain, to process Special Personal Information.

7. PURPOSES OF PROCESSING AND LEGAL BASES FOR PROCESSING

7.1 We will process your and / or your child's Personal Information in the ordinary course of operating Elaine Rheeder t/a KaleidoKidz. We will primarily use your and / or your child's Personal Information only for the purpose for which it was originally or primarily collected.

7.2 We will only process Personal Information where one of the grounds in section 11 of POPIA applies, namely where: (a) you (or, in the case of a Child, a Competent Person) have consented; (b) processing is necessary to conclude or perform a contract with you; (c) processing complies with an obligation imposed on us by law; (d) processing protects your or your Child's legitimate interests; or (e) processing is necessary to pursue our legitimate interests or those of a third party to whom the information is supplied. Special Personal Information and the Personal Information of children are processed only where sections 27 and 35 of POPIA allow it, which in most cases will be with the specific prior consent of a parent or guardian.

7.3 We will use your and / or your child's Personal Information for a secondary purpose only if such purpose constitutes a legitimate interest and is closely related to the original or primary purpose for which the Personal Information was collected, as required by section 15 of POPIA. We may subject your Personal Information to processing, use and / or dissemination, and during the course of various activities, including, without limitation, the following: -

7.3.1 operating Elaine Rheeder t/a KaleidoKidz;

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

7.3.2 preparing assessment reports, session plans, progress reports and other records relating to the services we provide;

7.3.3 compliance with applicable law and fraud prevention;

7.3.4 transfer of information to our Service Providers and other third parties; and / or

7.3.5 recruitment.

7.4 We may process your Personal Information for relationship management and marketing purposes in relation to our services (including, but not limited to, processing that is necessary for the development and improvement of our therapy centre), for accounts management, and for marketing activities (subject to the heading “Direct Marketing” below) in order to establish, maintain and/or improve our relationship with you and with our Service Providers. We may also analyse your Personal Information for statistical purposes.

7.5 We may process your Personal Information for internal management and management reporting purposes, including but not limited to: conducting internal audits, conducting internal investigations, implementing internal business controls, providing central processing facilities, for insurance purposes and for management reporting analysis.

7.6 We may Process your Personal Information for safety and security purposes.

8. PROCESSING OF SPECIAL PERSONAL INFORMATION

8.1 Where and when we need to process, disseminate and / or use your and / or your child’s Special Personal Information, we will do so in the ordinary course of the operation of Elaine Rheeder t/a KaleidoKidz, for a legitimate purpose, and in accordance with applicable law.

8.2 We will generally not process Special Personal Information about you unless it is necessary for establishing, exercising or defending a right or obligation in law,

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

where we have obtained your consent to do so, or where another ground in sections 27 to 33 of POPIA applies.

8.3 On rare occasions, there may be other reasons for processing your Special Personal Information, such as where the information has been deliberately made public by you. The situations in which we may process your Special Personal Information include the following:

8.3.1 we process information about the health, development, learning, behaviour and emotional well-being of the children who attend our sessions, with the specific prior consent of the Child's parent or guardian, in order to plan and provide our services and to monitor the Child's progress;

8.3.2 as part of the recruitment and hiring process, we may process information relating to any criminal behaviour on your part, including the checks against the National Child Protection Register and the National Register for Sex Offenders that the law requires for persons who work with children; and

8.3.3 we may process information that indicates your religious beliefs (for example, where you tell us about religious or cultural considerations relevant to your Child's sessions, or about dietary requirements at events).

9. COLLECTION OF PERSONAL INFORMATION

Having regard to sections 6, 8, 9 and 10 of the Children's Act, Act 38 of 2005 as amended, (regarding the consent required by children and rights of children) and in general; -

9.1 We collect your Personal Information in the following ways:

9.1.1 through direct or active interactions with you;

9.1.2 through automated or passive interactions with you; and

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

9.1.3 from third parties and public sources.

9.2 We may collect or obtain Personal Information about you / our clients: -

9.2.1 directly from you and / or your child;

9.2.2 in the course of our relationship with our clients;

9.2.3 in the course of providing our services to you or your Child and promoting our services;

9.2.4 when you make your Personal Information public;

9.2.5 when you visit and/or interact with our Website or our various social media platforms;

9.2.6 when you interact with any third-party content and / or from any third-party (e.g., law enforcement authorities);

9.2.7 from your Child's school, teachers, doctors, therapists or other professionals involved in your Child's care or education, with your consent;

9.2.8 when you register to use any of our services, buy our products, including but not limited to our products, newsletters and updates;

9.2.9 when you and / or your child attend any activity and / or event of whatsoever nature at Elaine Rheeder t/a KaleidoKidz and / or presented and/or organised by Elaine Rheeder t/a/ KaleidoKidz; and

9.2.10 when you visit our centre and / or when we grant you access to our premises.

9.3 In addition to the above, we may create Personal Information about you such as records of your communications and interactions with us, including, but not limited to, electronic communications, your attendance at events or at interviews in the

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

course of applying for a job with us, other mailings and interactions with you and also during the course of our digital and other marketing campaigns in any form.

9.4 We also collect Personal Information when you complete and submit client intake, consent and registration forms, questionnaires, booking and order forms, and supplier forms. Further through any correspondence via email, telephone calls, feedback forms, registering for and attending events, giving us your business card etc.

9.5 If you contact us, we reserve the right to retain a record of that correspondence in accordance with any record retention policy, as may be applicable, from time to time, and applicable data protection legislation, which may include Personal Information.

9.6 The Personal Information that we actively collect from you may include any of the Personal Information listed in this Privacy Policy and, in some instances, certain Special Personal Information listed in this Privacy Policy.

9.7 We receive Personal Information and Special Personal Information about you from various third parties including referring professionals and schools (with your consent), recruitment agencies, suppliers of background check services and publicly available sources.

10. UTILISATION OF PERSONAL INFORMATION

10.1 We use your Personal Information for the following purposes:

10.1.1 to provide therapeutic play, learning support, life coaching and study methods workshop services, and related products, to our clients, including assessing needs, planning and conducting sessions and preparing progress reports;

10.1.2 to comply with our regulatory reporting obligations;

10.1.3 to comply with our statutory obligations, including tax and employment-related obligations and any obligation to report a reasonable belief that a

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

Child has been abused or neglected, or that a sexual offence has been committed against a Child (including in terms of section 110 of the Children's Act 38 of 2005 and section 54 of the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007);

10.1.4 to conduct the recruitment and hiring processes, which includes conducting criminal record and credit checks (where appropriate), checks against the National Child Protection Register (Children's Act 38 of 2005) and the National Register for Sex Offenders (Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007) for persons who will work with children, the capturing of a job applicant's details and providing status updates to job applicants;

10.1.5 in relation to supplier information, to create supplier profiles on our systems, pay suppliers, and for general supplier administration;

10.1.6 to maintain and update our client, or potential client databases;

10.1.7 to maintain and update our supplier database;

10.1.8 to detect, prevent or manage actual or alleged fraud, security breaches or the abuse, misuse or unauthorised use of our systems and files, our website and/or contraventions of this Privacy Policy or the agreements;

10.1.9 for security, administrative and legal purposes;

10.1.10 for client relations purposes, which may include storage of clients' marital status and birthdates;

10.1.11 to communicate with you and retain a record of our communications with you and your communications with us;

10.1.12 to fulfil any contractual obligations that we may have to you or any third party;

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

10.1.13 to communicate with your Child's school, teachers, doctors and other professionals involved in your Child's care or education, with your consent;

10.1.14 to process orders and payments for products bought through our online shop and to arrange delivery;

10.1.15 to invite you to webinars, functions or events that we may host; and

10.1.16 for other activities and/or purposes which are lawful, reasonable and adequate, relevant and not excessive in relation to the provision of our services and/or our business activities or such other purpose for which it was collected, provided that such purpose is compatible with the purposes listed above.

10.2 We will obtain your permission before collecting or using your Personal Information and/or Special Personal Information for any other purpose.

11. CATEGORIES OF PERSONAL INFORMATION

11.1 We may use, retain and process the following categories of Personal Information about you and/or your child-

11.1.1 personal details: full name and surname, photographs and video material (with your consent), health and developmental information, including existing and future medical and other reports, and, at any time, information regarding mental and/or psychological state, health and condition;

11.1.2 demographic information: gender, date of birth / age, nationality, culture, salutation, title, and home language and language preferences;

11.1.3 education information: school, grade, teacher details, school reports and educational assessments;

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

11.1.4 parental responsibility information: details of the parents or guardians of a Child and, where relevant, court orders, parenting plans or similar documents;

11.1.5 identifier information: passport or national identity number;

11.1.6 contact details: correspondence address, telephone number, mobile number, email address, and details of your public social media profile(s);

11.1.7 attendance records: details of meetings and other events organised by or on behalf of Elaine Rheeder t/a KaleidoKidz that you may and / or may not have attended;

11.1.8 consent records: records of any consents you may have given, together with the date and time, means of consent and any related information;

11.1.9 payment details: billing address; payment method, bank account number (card payments are processed by our payment service providers and we do not store your full card number), invoice records, payment records, payment amount, payment date, and records of cheques and EFT payments;

11.1.10 data relating to your visits to our Website and or social media platforms, your device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Website and / or social media platform, and other technical communications information;

11.1.11 employer details: where you interact with us in your capacity as an employee of an organisation, the name, address, telephone number and email address of your employer, to the extent relevant; and

11.1.12 content and advertising data: records of your interactions with our online advertising and content, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

content or advertising (including, but not limited to, mouse hover, mouse clicks and any forms you complete).

11.2 We will obtain your permission before collecting or using your Personal Information and /or Special Personal Information for any other purpose.

12. COMPULSORY PERSONAL INFORMATION

12.1 The following information is compulsory Personal Information:

12.1.1 your full legal name/s and surname;

12.1.2 your contact details, such as your email address and/or your telephone number;

12.1.3 for a Child who attends our sessions, the Child's name and date of birth, the details of the parent or guardian who consents to our services, and the health and developmental information that we reasonably require to provide our services safely and appropriately; and

12.1.4 depending on the nature of your engagement or relationship with us, other types of Personal Information that may be necessary.

12.2 All other Personal Information is optional. If you do not agree to share the abovementioned compulsory Personal Information with us, then you will not be able to engage with us, supply your products or services to us or make full use of our products and services. If you do not agree to share your optional information with us, then you might not be able to engage with us fully, be paid for your products and services or receive complete and accurate products and services from us.

Please note:

In the clause above, you agree and accept that there is certain compulsory Personal Information you must provide us with if you want to engage with us fully, supply your products or services to us. If you decide not to provide

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

us with such compulsory Personal Information, you agree that we may limit our engagement with you, our procurement of your goods and services.

13. SHARING OF YOUR PERSONAL INFORMATION

13.1 We may disclose your Personal Information to our associates, agents and service providers, for legitimate business purposes, in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality. In addition, we may disclose your Personal Information; -

13.1.1 if required by law;

13.1.2 to legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law and / or regulation;

13.1.3 to third party Operators (including, but not limited to, data processors such as providers of data hosting services and document review technology and services), located anywhere in the world;

13.1.4 where it is necessary for the purposes of, or in connection with, actual or threatened legal proceedings or establishment, exercise or defence of legal rights;

13.1.5 to any relevant party for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including, but not limited to, safeguarding against, and the prevention of threats to, public security;

13.1.6 to any relevant third party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including, but not limited to, in the event of a sale of the business);

13.1.7 to any relevant third-party provider, where our Website and / or social media platforms uses third party advertising, plugins or content;

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

13.1.8 to your Child's school, teachers, doctors, therapists or other professionals involved in your Child's care or education, but only with your prior consent or where the law requires or permits it;

13.1.9 to a designated child protection organisation, the provincial department of social development or the South African Police Service, where we are required by law to report a reasonable belief that a Child has been abused or deliberately neglected, or knowledge that a sexual offence has been committed against a Child; and

13.1.10 to our attorneys and debt collectors, where an account is overdue.

13.2 If we engage a third party Operator to process any of your Personal Information, we recognise that any Operator who is in a foreign country must be subject to a law, binding corporate rules or binding agreements which provide an adequate level of protection similar to POPIA. We will review our relationships with Operators we engage and, to the extent required by any applicable law in force, we will require such Operators to be bound by contractual obligations to:

13.2.1 only Process such Personal Information in accordance with our prior written instructions;

13.2.2 establish and maintain the security measures required by section 19 of POPIA and notify us immediately where there are reasonable grounds to believe that the Personal Information has been accessed or acquired by an unauthorised person (sections 20 and 21 of POPIA); and

13.2.3 use appropriate measures to protect the confidentiality and security of such Personal Information.

13.3 We will not intentionally disclose your Personal Information, whether for commercial gain or otherwise, other than with your permission, as permitted by applicable law or in the manner as set out in this Privacy Policy.

13.4 You agree and give permission for us to share your Personal Information under the following circumstances:

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

13.4.1 with our agents, advisers and suppliers that have agreed to be bound by applicable data protection legislation and this Privacy Policy or similar terms, which offer a similar level of protection as this Privacy Policy;

13.4.2 with our employees, suppliers, consultants, contractors and agents if and to the extent that they require such Personal Information in order to process it for us and/or in the provision of services for or to us, which include reporting purposes (e.g. the South African Revenue Service); hosting, development and administration, technical support and other support services relating to our website or the operation of our business. We will authorise any Personal Information processing done by a third party on our behalf, amongst other things by entering into written agreements with those third parties governing our relationship with them and containing confidentiality; non-disclosure and data protection provisions. Such persons may be disciplined, their contracts terminated or other appropriate action taken if they fail to meet their obligations;

13.4.3 to enable us to enforce or apply our terms and/or any agreement you have with us;

13.4.4 to protect our rights, property or safety or that of our clients, employees, contractors, suppliers, agents and any other third party; and

13.4.5 with governmental agencies and other regulatory or self-regulatory bodies, if required to do so by law or when we reasonably believe that such action is necessary to:

13.4.5.1. comply with the law or with any legal process;

13.4.5.2. protect and defend our rights, property or the safety of our clients, employees, contractors, suppliers, agents or any third party;

13.4.5.3. detect, prevent or manage actual or alleged fraud, security breaches, technical issues, or the abuse, misuse or

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

unauthorised use of or contraventions of this Privacy Policy; and / or

13.4.5.4. protect the rights, property or safety of members of the public.

13.5. We will get your permission before disclosing your Personal Information to any third party for any other purpose, if we are required by law to do so.

14. STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION

14.1. We store your Personal Information on:

14.1.1. our premises, in the form of hard copies;

14.1.2. the premises of third-party service providers such as document storage service providers;

14.1.3. our servers / cloud-based storage facilities; and / or

14.1.4. on the servers of our third-party service providers, such as IT systems or hosting service providers, and the messaging and email platforms (such as WhatsApp) that we use to communicate with you.

14.2. In the event of the scenarios contemplated in clauses 14.1.2 and 14.1.4, we will ensure that we have entered into written agreements with those third-party service providers governing our relationship with them that require them to secure the integrity and confidentiality of Personal Information in their possession by taking appropriate, reasonable technical and organisational measures.

15. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

15.1 From time to time, we and our service providers may need to transfer to and/or store your Personal Information on servers in a jurisdiction other than where it was collected (i.e. outside of South Africa and in the cloud) and we hereby notify you that such jurisdiction may not have comparable data protection legislation. This includes cloud-based email, document storage, practice-management and back-

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

up services and messaging platforms such as WhatsApp, whose servers may be located outside South Africa.

15.2 If the location to which Personal Information is transferred and/or is stored does not have substantially similar laws to those of South Africa, which provide for the protection of Personal Information, we will take reasonably practicable steps, including the imposition of appropriate contractual terms to ensure that your Personal Information is adequately protected in that jurisdiction.

15.3 We will only transfer Personal Information to a third party outside South Africa where section 72 of POPIA permits it, namely where: (a) the recipient is subject to a law, binding corporate rules or a binding agreement which provides an adequate level of protection that is substantially similar to POPIA; (b) you consent to the transfer; (c) the transfer is necessary for the performance of a contract between you and us, or for a contract concluded in your interest; or (d) the transfer is for your benefit and it is not reasonably practicable to obtain your consent, and you would be likely to give it.

16. SECURITY OF DATA AND INFORMATION

16.1. We implement appropriate technical and organisational security measures to protect the Personal Information that is in our possession against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, in accordance with applicable law. We keep hard copies and documentation containing Personal Information, especially that of children under safe lock and key to which only authorised persons have access to. Electronic data is protected by measures such as strong passwords and, where available, multi-factor authentication, access controls, firewalls, anti-virus software, encryption and regular back-ups.

16.2. Where there are reasonable grounds to believe that your Personal Information that is in our possession has been accessed or acquired by any unauthorised person, we will notify the Information Regulator (using the Regulator's prescribed online reporting platform) and you as soon as reasonably possible, as required by section 22 of POPIA, unless a public body responsible for detection, prevention or

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

investigation of offences or the Information Regulator informs us that notifying you will impede a criminal investigation.

16.3. Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Information that is in our possession, we cannot guarantee the security of any information transmitted using the internet and we cannot be held liable for any loss of privacy occurring during the course of such transmission.

16.4. When you are using our website or other social media platforms you could be directed to other sites that are beyond our control. We are not responsible for the content or the privacy policies of those third-party websites.

16.5. We take reasonable technical and organisational measures to secure the integrity of your Personal Information and using accepted technological standards to prevent unauthorised access to or disclosure of your Personal Information, and protect your Personal Information from misuse, loss, alteration and destruction.

16.6. We review our information collection, storage and processing practices, including physical security measures periodically, to ensure that we keep abreast of good practice.

16.7. We also create a back-up of your information for operational, business continuity and safety purposes and we have a back-up disaster recovery program.

16.8. **Despite the above measures being taken when processing Personal Information and Special Personal Information, as far as the law allows, we will not be liable for any loss, claim and/or damage arising from any unauthorised access, disclosure, misuse, loss, alteration or destruction of your Personal Information and/or Special Personal Information which occurs despite our having implemented the appropriate, reasonable measures required by POPIA. This does not exclude our liability for loss caused by our gross negligence or wilful misconduct, or any liability which cannot lawfully be excluded.**

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

16.9. We have implemented policies and procedures to address actual and suspected data breaches and undertake to notify you and the relevant regulatory authorities of breaches in instances in which we are legally required to do so and within the period in which such notification is necessary.

Please Note:
In this clause, you acknowledge that you know and accept that technology is not absolutely secure and there is a risk that your Personal Information and Special Personal Information will not be secure when processed by means of technology. We do not promise that we can keep your Personal Information and Special Personal Information completely secure. To the maximum extent permitted by law, you will not be able to take action against us if you suffer losses or damages in these circumstances, unless the loss or damage was caused by our gross negligence or wilful misconduct.

17. RETENTION OF YOUR PERSONAL INFORMATION

17.1. We may keep your Personal Information for as long as you continue to engage with us, provide services or products to us, or use our products and services or for as long as reasonably necessary or until you contact us and ask us in writing to destroy it, subject to the paragraphs below.

17.2. Aside any other clause in this Privacy Policy, we may retain and process some or all of your Personal Information if and for as long as:

17.2.1. we are required or permitted by law, a code of conduct or a contract with you to do so;

17.2.2. we reasonably need it for lawful purposes related to the performance of our functions and activities; and / or

17.2.3. we reasonably require it for evidentiary purposes.

17.3. To determine the appropriate retention period for Personal Information, we will consider, among other things, the nature and sensitivity of the Personal

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

Information, the potential risks or harm that may result from its unauthorised use or disclosure, the purposes for which we process it and whether those purposes may be achieved through other means. We will always comply with applicable legal, regulatory, tax, accounting or other requirements as they pertain to the retention of Personal Information, as well as our record retention policy.

17.4. As a general guide, and subject to any longer period required by law: (a) records of the services we provide to a Child (including assessment and progress reports and session notes) are kept until the Child turns 21, or for at least 6 (six) years after the last session, whichever is later; (b) financial and tax records are kept for at least 5 (five) years, as required by the Tax Administration Act 28 of 2011; and (c) employment records are kept for at least 3 (three) years after employment ends, as required by the Basic Conditions of Employment Act 75 of 1997.

17.5. When we no longer need Personal Information, we will destroy or delete it, or de-identify it, in a manner that prevents its reconstruction in an intelligible form (section 14 of POPIA).

18. MAINTENANCE OF YOUR PERSONAL INFORMATION

18.1. Where required by law, we will take all reasonable steps to ensure that your Personal Information is accurate, complete, not misleading and up to date.

18.2. We acknowledge that you may have rights of access to, and the right to rectify, your Personal Information, and rights to object to the processing of your Personal Information in certain circumstances.

18.3. You must advise us if any of the Personal Information that we have about you is incorrect, incomplete, misleading or out of date, by notifying us.

18.4. Where required by law, we will take reasonable steps to correct or update your Personal Information accordingly, having regard to the purpose for which such Personal Information was collected or used.

19. YOUR RIGHTS

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

19.1 Data protection legislation may confer certain rights on you in respect of your Personal Information. You may have rights under the South African and other laws to have access to your Personal Information and to ask us to rectify, erase and restrict use of your Personal Information. You may also have rights to object to your Personal Information being used, and to withdraw consent to the use of your Personal Information. You may, therefore, on reasonable grounds, object to us using your Personal Information. If you object, we will stop using your personal information, except if the law allows its use.

19.2 We aim to be clear about what Personal Information we collect so that you can make meaningful choices about what Personal Information you make available to us. You may, for example:

19.2.1 **Request access to your Personal Information** (commonly known as a "data subject access request"), which indicates what Personal Information we have about you;

19.2.2 **Request the correction of your Personal Information**, in order to ensure that any incomplete or inaccurate Personal Information is corrected;

19.2.3 **Request erasure of your Personal Information**, where there is no lawful basis for the retention or continued processing of it;

19.2.4 **Object to the processing of your Personal Information** for a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms;

19.2.5 **Request restriction of processing of your Personal Information**. This enables you to ask us to suspend the processing of your Personal Information in limited circumstances, which may differ by jurisdiction;

19.2.6 **Withdraw consent which you previously gave to the processing of your Personal Information at any time**. You may withdraw your consent for us to process your Personal Information at any time. The withdrawal

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

of your consent can only be made by you on condition that such withdrawal of your consent:

19.2.6.1 does not affect the processing of your Personal Information before the withdrawal of your consent;

19.2.6.2 does not affect the processing of your Personal Information if the processing is in compliance with an obligation imposed by law on us;

19.2.6.3 does not affect the processing of your Personal Information where such processing is necessary for the proper performance of a public law duty by a public body;

19.2.6.4 does not affect the processing of your Personal Information as required to finalise the performance of a contract in which you are a party; and / or

19.2.6.5 does not affect the processing of your Personal Information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.

19.2.7 Withdrawal of consent may limit our ability to provide certain products and services to you or the ability of a third party to provide certain products or services to you but will not affect the continued processing of your Personal Information in instances in which your consent is not required;

19.2.8 **Institute civil proceedings** regarding an alleged interference with the protection of your Personal Information processed in accordance with this Privacy Policy;

19.2.9 **Be notified** that your Personal Information is being collected, and of any security compromise affecting it (sections 18 and 22 of POPIA);

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

19.2.10 **Object to direct marketing** and not to receive unsolicited electronic direct marketing without your consent (section 69 of POPIA);

19.2.11 **Not be subject to a decision based solely on automated processing** of your Personal Information which has legal consequences for you (section 71 of POPIA). We do not make such decisions; and

19.2.12 **Lodge a complaint with the Information Regulator** (see the contact details below).

19.3 We will not charge you a fee to confirm whether we hold Personal Information about you, or for an objection or a request for correction or deletion. A fee may be payable for access to a record in accordance with PAIA and our PAIA Manual. We may refuse a request, in whole or in part, only on the grounds permitted by POPIA and PAIA, in which case we will give you our reasons.

19.4 You may submit an objection, a request for the correction or deletion of your Personal Information, or a withdrawal of consent to our Information Officer by email, by hand, by post or by telephone (telephonic requests will be recorded), preferably on a form substantially similar to Form 1 (objection) or Form 2 (correction or deletion) of the Regulations relating to the Protection of Personal Information, 2018, as amended. These forms are available from us or from the Information Regulator's website. Requests for access to your Personal Information are dealt with in terms of section 23 of POPIA and the procedure set out in our PAIA Manual.

20. CHANGES TO THIS PRIVACY POLICY

20.1 To the extent allowed by the law, this Privacy Policy may be amended and updated from time to time in our sole discretion, in which case we will post the revised policy on our website and, where the changes are material, take reasonable steps to bring them to your attention (for example, by email or a notice on our Website). Accordingly, please periodically check our Privacy Policy on our website.

20.2 If you continue to engage with us, provide products or services to us or use our products and services after amendments are made to the Privacy Policy and

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

displayed on this Website, you will be deemed to have accepted the updated Privacy Policy. Where a change requires your consent, we will ask for it.

21. CHILDREN'S INFORMATION

21.1 Elaine Rheeder t/a KaleidoKidz in the course of business operations, has to and will collect, disseminate and / or use Personal Information and Special Personal Information of children (persons under the age of 18 years). We shall do so with express consent of a parent or guardian of such child and / or where relevant and applicable the express consent of such child and / or if the law otherwise allows or requires us to process, use and / or disseminate such personal information regarding any child client of Elaine Rheeder t/a KaleidoKidz. This shall always be done in accordance with applicable law.

21.2 Many of our products and services are aimed at children under the age of 18 years.

21.3 We may process Personal Information of children with the consent of a competent person or to comply with an obligation in law.

21.4 We will not knowingly collect Personal Information of persons in this age group without express consent to do so or without a legal obligation to do so.

21.5 Where the parents of a Child are separated or divorced, or where more than one person holds parental responsibilities and rights in respect of a Child, we may ask for a copy of any relevant court order, parenting plan or other document, in order to determine who may consent to our services and to the processing of the Child's Personal Information, and who may receive information about the Child.

21.6 Having regard to the Child's age, maturity and stage of development, we will explain to the Child, in an age-appropriate manner, how his or her information will be used, and we will give due consideration to the Child's views (section 10 of the Children's Act 38 of 2005).

21.7 We share feedback and progress information with the Child's parent or guardian. Information that a Child shares during sessions is treated with sensitivity and with regard to the Child's best interests, but will be disclosed where the law requires it,

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

including where we believe on reasonable grounds that a Child has been abused or neglected or is at risk of harm.

21.8 **We will not publish photographs, video recordings or any other information from which a Child can be identified on our Website, social media platforms or in marketing material without the prior, specific written consent of the Child's parent or guardian.** You may withdraw this consent at any time, and we will then remove the content from the platforms under our control as soon as reasonably possible.

21.9 For any questions in respect of the processing of Personal Information of children, please contact the Information Officer or the Deputy Information Officer on admin@kaleidokidz.co.za.

22. DIRECT MARKETING

22.1 We may Process your Personal Information for the purposes of providing you with information regarding services that may be of interest to you. You may unsubscribe for free at any time.

22.2 We will only send you direct marketing by electronic communication (including email, SMS, WhatsApp messages and telephone calls) if you have given your consent, or if you are an existing client and we obtained your contact details in the context of the sale of a product or service, in which case we will only market our own similar products or services to you and will give you an opportunity to object each time we contact you (section 69 of POPIA). We will ask for your consent only once, and we will not treat your failure to opt out as consent.

22.3 Every direct marketing communication will identify us and include a simple way to opt out, free of charge. We keep a record of persons who have opted out or withheld consent and will not send them further direct marketing.

22.4 If you currently receive marketing information from us which you would prefer not to receive in future please notify us at admin@kaleidokidz.co.za.

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

23. CONSUMER PROTECTION ACT AND OTHER LAWS

23.1 If this Privacy Policy or any provision in this Privacy Policy is regulated by or subject to the *Consumer Protection Act*, 68 of 2008, POPIA or other laws, it is not intended that any provision of this Privacy Policy contravenes any provision of the Consumer Protection Act, POPIA or such other laws. Therefore, all provisions of this Privacy Policy must be treated as being qualified, to the extent necessary, to ensure that the provisions of the Consumer Protection Act, POPIA and such other laws are complied with.

23.2 No provision of this Privacy Policy:

23.2.1 does or purports to limit or exempt us from any liability (including, without limitation, for any loss directly or indirectly attributable to our gross negligence or wilful default or that of any other person acting for or controlled by us) to the extent that the law does not allow such a limitation or exemption;

23.2.2 requires you to assume risk or liability for the kind of liability or loss, to the extent that the law does not allow such an assumption of risk or liability; and / or

23.2.3 limits or excludes any warranties or obligations which are implied into this Privacy Policy by the Consumer Protection Act (to the extent applicable), POPIA (to the extent applicable), or other applicable laws or which we give under the Consumer Protection Act (to the extent applicable), POPIA (to the extent applicable), or other applicable laws, to the extent that the law does not allow them to be limited or excluded.

24. DATA ACCURACY

24.1 The Personal Information provided to Elaine Rheeder t/a KaleidoKidz should be accurate, complete and up-to date.

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

24.2 Should Personal Information change, the onus is on the provider of such data to notify Elaine Rheeder t/a KaleidoKidz of the change and provide it with the accurate data.

25. DATA MINIMISATION

Elaine Rheeder t/a KaleidoKidz will restrict its processing of Personal Information to data which is sufficient for the fulfilment of the primary purpose and applicable legitimate purpose for which it was collected.

26. COOKIES AND SIMILAR TECHNOLOGIES POLICY

26.1 We may Process your Personal Information through our use of Cookies and similar technologies.

26.2 When you visit our Website, we may place Cookies on your device, or read Cookies already on your device, in accordance with applicable law. Cookies record information about your device, your browser and, in some cases, your preferences and browsing habits. Where we use Cookies that are not strictly necessary for the Website to function (such as analytics or advertising Cookies), we will tell you about them on our Website. You can manage or disable Cookies in your browser settings, although some parts of the Website may then not work properly.

27. GENERAL

27.1. You agree that this Privacy Policy, our relationship and any dispute of whatsoever nature relating to or arising out of this Privacy Policy whether directly or indirectly is governed by South African law, without giving effect to any principle of conflict of laws.

27.2. You agree that we may, at any time, transfer, cede, delegate or assign any or all of our rights and obligations under this Privacy Policy without your permission. We will notify you if we transfer, cede, delegate or assign any rights or obligations to a third party, but we do not have to notify you if we transfer, cede, delegate or assign any rights or obligations to any person which acquires all or part of our business and/or assets. We may in certain instances, also sub-contract our obligations, for

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

example, engaging with external IT service providers or printers. Where we engage such subcontractors, we will do so without your permission and we do not have to notify you if we sub-contract any of our obligations.

27.3. This Privacy Policy shall apply for the benefit of and be binding on each party's successors and assigns.

27.4. Our failure to exercise or enforce any right or provision of this Privacy Policy shall not constitute a waiver of such right or provision.

27.5. Each provision of this Privacy Policy, and each part of any provision, is removable and detachable from the others. As far as the law allows, if any provision (or part of a provision) of this Privacy Policy is found by a court or authority of competent jurisdiction to be illegal, invalid or unenforceable (including without limitation, because it is not consistent with the law of another jurisdiction), it must be treated as if it was not included in this Privacy Policy and the rest of this Privacy Policy will still be valid and enforceable.

28. CONTACT DETAILS OF INFORMATION OFFICER

28.1 Information Officer / Data Protection Officer: June Elaine Rheeder;

28.2 Deputy Information Officer: Jacques Rheeder (jacques@kaleidokidz.co.za);

28.3 Email: admin@kaleidokidz.co.za;

28.4 Mobile: 065 582 7830; and

28.5 Physical Address: 341 Equestrian Road, Ruimsig, Roodepoort.

29. QUERIES AND CONTACT DETAILS OF THE INFORMATION REGULATOR

29.1. Should you feel that your rights in respect of your Personal Information have been infringed, please first address your concerns to the Information Officer or Deputy Information Officer at admin@kaleidokidz.co.za.

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.

29.2. If you feel that the attempts by us to resolve the matter have been inadequate, you may lodge a complaint with the South African Information Regulator by accessing their website at https://inforegulator.org.za.

29.3. If you are located outside of South Africa, you may contact the appropriate regulator in your country of domicile.

30. LODGING A COMPLAINT

30.1. You may lodge a complaint to the Information Regulator (South Africa) with the following contact details:

30.1.1. POPIA complaints email: POPIAComplaints@inforegulator.org.za;

30.1.2. General enquiries email: enquiries@inforegulator.org.za;

30.1.3. Telephone: 010 023 5200 / toll-free 0800 017 160;

30.1.4. Website: https://inforegulator.org.za; and

30.1.5. Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191.

30.2. A complaint may be lodged on Form 5 of the Regulations relating to the Protection of Personal Information, including through the Regulator's online eServices portal. The Regulator does not charge a fee for lodging a complaint.

THUS APPROVED AND SIGNED ON THIS THE 1st DAY OF OCTOBER 2026 BY THE INFORMATION OFFICER AND OWNER



JUNE ELAINE RHEEDER
trading as KaleidoKidz

Copyright © 2026 Elaine Rheeder t/a KaleidoKidz. All rights reserved. No part of this material may be reproduced, distributed, or transmitted in any form or by any means, without the prior written permission.