

My Career Plan – Privacy Policy

1. Who I am and what this policy covers

This policy explains how My Career Plan collects, uses, stores and protects your personal information, in line with the Protection of Personal Information Act 4 of 2013 (POPIA).

My Career Plan is an independent practice run by Raffaella Ruscic, an HPCSA-registered Independent Practice Psychometrist (registration number PMT0074349). For the purposes of POPIA, I am the **responsible party** for the personal information described here.

This policy applies to:

- this website (mycareerplan.co.za), including its contact form and online shop
- enquiries made by email, phone or WhatsApp
- career counselling, subject choice guidance, study skills coaching and psychometric assessments
- purchases of career guides

Contact details: info.mycareerplan@gmail.com · 082 334 4310

2. What personal information I collect

I collect only what I need to respond to you and provide the service you have asked for.

Category	Examples	When it is collected
Contact details	Name, email address, phone number	Contact form, email, phone or WhatsApp enquiries
Learner details	Learner's name, grade, school, subjects	Contact form and initial consultation
Background information	School reports, work history, study or career goals, relevant family context	Before or during the initial consultation
Assessment information	Psychometric test responses, scores, reports, session notes	During assessment and feedback
Payment details	Invoice records, proof of payment	When you pay for a service or guide
Purchase details	Name, email address, items purchased	When you buy a guide on this website

Category	Examples	When it is collected
Website usage data	Pages visited, device and browser type, approximate location, how you arrived at the site	Automatically, through cookies and analytics tools (see section 7)

I do not store full card details. Card payments for guides are processed by the payment provider, not by me.

3. Why I collect it and how I use it

I use your personal information only for the purposes below, and only where POPIA allows it.

Purpose	Lawful basis under POPIA
Responding to enquiries and booking sessions	Your consent, and taking steps at your request before a contract
Conducting assessments, writing reports and giving feedback	Performance of our agreement, and your consent (a parent's or guardian's for learners under 18)
Invoicing and record-keeping	Performance of our agreement and legal obligations
Delivering purchased guides by email	Performance of the sale
Keeping professional records as required by the HPCSA	Legal obligation
Improving the website and measuring advertising	My legitimate interest in running the practice (see section 7)
Sending occasional newsletters or resources	Your consent only, which you can withdraw at any time

I will not use your information for any other purpose without telling you first and, where required, asking for your consent.

4. Learners under 18

Most of my clients are high school learners, so I take particular care with children's information.

- I process a learner's personal information only with the consent of a parent or legal guardian, as POPIA requires for anyone under 18.
- The parent or guardian signs a consent form before any assessment begins.
- Learners are told, in language suited to their age, what the assessment involves and how their results will be used.

- Results and reports are discussed with the learner and the consenting parent or guardian. They are not shared with the school or anyone else without that parent's or guardian's written consent.

5. Assessment information and confidentiality

Psychometric results are treated as confidential professional records, under the HPCSA's ethical rules as well as POPIA.

- Test responses, scores, reports and session notes are seen only by me, except where a service provider hosts the online test platform (see section 6).
- Raw test data and test materials are not released, to protect the validity of the tests. You will always receive the interpreted report and feedback.
- Where an assessment reveals information about health, such as emotional wellbeing, this is special personal information under POPIA. It is processed only with your consent and only for your assessment.
- I will disclose assessment information without consent only where the law requires it, a court orders it, or it is justified in the public interest, as permitted by the HPCSA's ethical rules.

6. Who I share information with

I do not sell, rent or trade your personal information. I share it only with service providers who help me run the practice, and only what each needs.

Service provider	What it does	Information involved
Wix	Hosts this website, contact form and shop	Contact form entries, purchase details, website usage data
Gmail (Google)	Practice email	Emails and attachments you send me
Yoco [and/or PayFast]	Processes card payments for guides	Payment and purchase details
Google (Analytics, Ads, Tag Manager)	Website analytics and advertising measurement	Website usage data (see section 7)
[Online psychometric testing platform(s)]	Hosts online tests and scoring	Learner's name and test responses
[Video call platform, e.g. Zoom or Google Meet]	Online consultations and feedback sessions	Name and email address

These providers act on my behalf as **operators** under POPIA and must keep your information secure and confidential.

Information stored outside South Africa. Some of these providers store data on servers outside South Africa. I use only providers that are bound by data protection laws or agreements offering protection comparable to POPIA, as section 72 of POPIA requires.

7. Cookies, analytics and advertising

This website uses cookies: small files stored on your device that help the site work and show me how it is used.

- **Essential cookies** keep the site, contact form and shop working. They cannot be switched off.
- **Analytics cookies** (Google Analytics) show which pages are visited and how people find the site. This information is aggregated and does not identify you by name.
- **Advertising cookies** (Google Ads) measure whether my adverts lead to enquiries, for example when someone submits the contact form after clicking an ad.

You can block or delete cookies in your browser settings. The site will still work, although some features may not. You can also opt out of Google Analytics with Google's browser add-on and manage ad personalisation in your Google account settings.

8. How I protect and store your information

I take reasonable technical and organisational measures to keep your information safe, including:

- password-protected devices and accounts, with two-step verification where available
- encrypted (HTTPS) connections on this website
- storing assessment records electronically in secure, access-restricted storage
- sharing reports only with the client and consenting parent or guardian

If a data breach affects your personal information, I will notify you and the Information Regulator as POPIA requires.

How long records are kept. I follow the HPCSA's guidelines on keeping patient records ([Booklet 9](#)):

Record	Retention period
Assessment records for adults	At least 6 years after your last session
Assessment records for learners under 18	Until the learner's 21st birthday, or 6 years after the last session if that is later
Enquiries that did not lead to a booking	[12 months]
Invoices and financial records	5 years, as required for tax purposes

After these periods, records are securely deleted or destroyed.

9. Your rights

Under POPIA you have the right to:

- ask whether I hold personal information about you, and request a copy of it
- ask me to correct information that is inaccurate, incomplete or out of date
- ask me to delete information, unless I am required by law or HPCSA rules to keep it
- object to the processing of your information, or withdraw your consent at any time
- not receive direct marketing without your consent

- lodge a complaint with the Information Regulator

Parents or guardians may exercise these rights on behalf of a learner under 18. To make a request, email me at [practice email address]. I will respond within a reasonable time and may ask you to confirm your identity first.

Direct marketing. I will send newsletters or promotional emails only if you have opted in. Every message includes a way to unsubscribe, and you can opt out at any time by emailing me.

Information Officer. As a sole practitioner, I am the Information Officer for My Career Plan. Please contact me first with any privacy concern so I can try to resolve it.

10. Changes to this policy

I may update this policy when my services, tools or the law change. The latest version will always be on this page, with the date it was last updated.

Last updated: 29 September 2026

Contact: Raffaella Ruscic, My Career Plan · info.mycareerplan@gmail.com · 082 334 4310