

PATIENT CONFIDENTIALITY- Privacy Notice Document

Nu Prime Health Centre recognises its accountability in terms of the Protection of Personal Information Act, together with its Regulations to all its stakeholders. Nu Prime Health Centre and our Practitioners, needs to collect personal information from its employees, clients, suppliers, operators, patients as well as other stakeholders to carry out its business.

In order to maintain a trust relationship with our stakeholders, we are committed to complying with both the spirit and the letter of this Act and to always act with due skill, care and diligence when dealing with personal information.

Nu Prime Health Centre is dedicated to protecting the privacy and confidentiality of personal information. We provide a website for our existing as well as prospective clients. People use our website to request more information regarding certain products and services, request On-line bookings, and to enquire about our various products and services. In addition, this information is then stored on our online platform in order for Nu Prime Health Centre and our Practitioners to connect with these clients. Our privacy notice applies to any member of, and / or visitor to, our Nu Prime* services.

Background:

Personal Information according to the Protection of Personal Information Act, means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b. Information relating to the education or the medical, financial, criminal or employment history of the person;
- c. Any identifying number, symbol, e-mail address, telephone number, location information, online identifier or other particular assignment to the person;
- d. The biometric information of the person;
- e. The personal opinions, views or preferences of the person;
- f. Correspondence sent by the person that would reveal the contents of the original correspondence;
- g. The views or opinions of another individual about the person; and
- h. The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Information we collect:

Personal information includes any information that lets us identify you, such as your name/s and surname combined with your physical address, contact details and/or passport/identity number. In terms of South African legislation, personal information also refers to the personal information that identifies legal entities, such as the trading name of a company combined with the company registration number.

In terms of South African legislation, **special personal information** refers to Information regarding race or ethnic origin, religious and philosophical beliefs, political persuasion, trade union membership, health or sex life, biometric information or any criminal behavior which relates to alleged criminal offences or proceedings.

The group (Nu Prime Health Centre and our Practitioners) collects personal information about its clients, what information is collected depends on how you elect to interact with the group. These interactions include but are not limited to filling in contracts, email correspondence, telephone correspondence, online software communication or making use of any affiliated group apps and software. Information includes what clients tell the group about themselves, what the group learns by having a client/patient or when a client/patient makes use of a specific product or service.

Where and when do we collect personal information:

- Directly from you;
- Based on your use of our products, services;
- Based on how you engage or interact with us, such as on social media, and through e-mails, letters, telephone calls, and surveys;
- Use of our website;
- From third parties affiliated with our services;
- From entities within our group.
- Gate access control procedures

Information we collect from others:

Service Use:

We log your visits and use of our services, including mobile applications. We may use logins, cookies, device information and internet protocol (IP) addresses to identify you and log your use.

Cookies, Web Beacons and Other Similar Technologies:

We may collect data through cookies and similar technologies. We use cookies and similar technologies to recognise you and / or your device(s) on, off and across different Services and devices. You can control cookies through your browser settings and other tools. You can also opt-out from our use of cookies and similar technologies that track your behaviour on the sites of others for third party advertising.

When will we process your personal information:

We will only process your personal information for lawful purposes relating to our business if the following circumstances apply:

- You have consented thereto;
- a Person legally authorised by you, or a court, has consented thereto;
- It is necessary to conclude or perform under a contract or service request we have with you;
- The law requires or permits it;
- It is required to protect or pursue your, our, or a third party's legitimate interest; and/or
- You are a child, and a competent person (such as a parent or guardian) has consented thereto on your behalf.

Kindly note: If you make use of any of our group services, you agree that in order to perform/conclude or fulfil our contractual relationship, comply with obligations imposed by law or to protect or pursue your, the group's, or a third party's legitimate interests, your personal information may be processed.

When will we process your special personal information:

Special personal information refers to the following categories of information:

- Religious and philosophical beliefs;
- Race;
- Ethnic origin;
- Trade union membership;
- Political beliefs;
- Health including physical or mental health, disability and medical history;
- Biometric information;
- Criminal behaviour where it relates to the alleged commission of any offence or the proceedings relating to that offence.

Nu Prime* will process special personal information in the following instances:

- You have consented to processing it (in circumstances where we are legally obliged to obtain your consent); or
- It is necessary to exercise or defend a right or obligation in law; or
- It is necessary to comply with an international legal obligation of public interest; or
- It is for certain historical, research or statistical purposes that would not adversely affect your privacy; or
- You have deliberately made your personal information public

How we use your information:

Services:

We use the data we have about you (e.g. the data you provide, data we collect from your engagement with our services and inferences we make from the data we have about you), to recommend relevant content and conversations on our services or suggest products you could add to your portfolio. We furthermore use your data to render the requested services to you.

Communications:

We will contact you, as well enable communications between yourself and our receptionists, office staff or practitioner/s. We will contact you through e-mail, mobile phone, notices posted on our websites or applications and any other ways through our services to you, including text messages and push notification based on your phone settings. We also send messages about how to use the services, network updates and reminders

Sensitive and Special Personal Information:

We will only use your sensitive and special personal information in so far as we are permitted by Law to do so.

Marketing:

The group (Nu Prime Health Centre and our Practitioners) will promote our services to you. We use data and content about our members for invitations and communications promoting membership and network growth, engagement and our services. The group may also market other business solutions services offered by the group. Communication in this regard will mainly be via telephone but could include, SMS, email, WhatsApp and fax

Client Support:

We use your data to help you and respond to queries. We use the data (which can include your communications) to investigate, respond to and resolve complaints and service issues (e.g. bugs).

Aggregate Insights:

We use data to generate aggregate insights. We use your data to produce and share aggregated insights that do not identify you. For example, we may use your data to generate statistics about our members, their profession or industry, to calculate ad impressions served or clicked on, or to publish visitor demographics for a Service or demographic workforce insights.

Security and Investigation:

We use data for security, fraud prevention and investigations. We use your data (including communications) if we think it is necessary for security purposes or to investigate possible fraud or other violations our user agreement or this privacy notice and / or attempts to harm our members or visitors.

Collection:

Enforcing our obligations, including without limitation to the collection of amounts outstanding from you for services rendered by us

How we share your information:

Related Services:

We may share your data across our different service departments and Nu Prime Health Centre practitioners. We might share your personal data with our affiliates to provide, expand and develop our services.

Third Party Service Providers:

We may make use of third party service providers to assist us with our services to you. They will have access to your information as reasonably necessary to perform these tasks on our or your behalf and are obligated not to disclose or use it for other purposes. Where required, each member of the group may share a customer's personal information with the following persons, which may include parties that the group engages with as independent responsible parties, joint responsible parties or operators.

- Information technology, photocopiers;
- Employers organisations;
- Government institutions;
- Training providers;
- Medical Aid companies;
- Financial administrators;
- Software/App developers;
- Verification agencies.

Legal Disclosures:

We may need to share your information when we believe it is required by law, legal process or to help protect the rights and safety of you, us or others. We attempt to notify members about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague, or lack proper authority, but we do not promise to challenge every demand

Your rights and obligations:

Data Retention:

We keep most of your personal information while you still have a profile with us and we need to provide you with services or where we are legally obligated to do so. We will process your information while your profile is still active with us and you keep on making use of our services. This includes any information you have provided to us or we have collected from third parties as set out in this privacy notice. Even if you are not constantly making use of our services, platforms, software and apps, we will retain your information and keep your profile open until you decide to stop making use of our services. We will also keep your information where you have agreed for us to do so, or have given your consent that we are allowed to do so.

In some instances, we choose to retain certain information about you after you have closed your profile, but we will do that in a depersonalised form for statistical, historical or research purposes.

We keep some of your information even after you have closed your profile or stopped making use of our services, if it is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our other user agreements, or fulfil your request to object to our processing of your information

Other important information:

Security:

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors, practitioners and other third parties who have a business need-to-know. They will only process your personal information on our specific instructions, and they are subject to a duty of confidentiality.

Transborder information transfers:

Some of the personal information that is collected automatically is collected by third parties whose technology we use to provide website functionality and acquire website analytics information. Some of these third parties will be outside of the borders of South-Africa and your information will be stored outside the borders of South Africa. We make use of Google Analytics and the information collected through this third party will be kept on the servers used by Google.

More information regarding Google's Privacy Policy can be found here

Contact Information:

Should you have a query please send an email to: info@nuprime.co.za

Our Information Officer:

Wallie van der Wal

Email: vanderwal@nuprime.co.za

The SA Information Regulator:

You have the right to lodge a complaint with the SA Information Regulator. See the Information Regulator contact details below.

The Information Regulator

33 Hoofd Street

Forum III, 3rd Floor Braampark

South Africa

info@justice.gov.za