

CUSTOMER PRIVACY NOTICE

PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

This Notice explains how **Dr Aaron Ndhluni and Dr Alana Heynes'** practice (Pty) Ltd ("**The Practice**"), obtain, use, and disclose personal information, in accordance with the requirements of the Protection of Personal Information Act, 4 of 2013, ("POPIA").

Personal information is information about the User that is personally identifiable like the user's name, surname, email address, and/or postal address and that is not otherwise publicly available.

At **The Practice** and including this website, we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

By using our Services and our website, you agree to the collection and use of information in accordance with this policy.

Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

1. THE INFORMATION WE COLLECT

- 1.1.** We collect and process your personal information mainly to contact you for the purposes of understanding your requirements, delivering services and products, improve our services and to conduct research. For this purpose, we will collect contact details including your name and, if applicable, that of your organisation.
- 1.2.** We may combine information about a specific User with information we obtain from business partners or other companies.
- 1.3.** Once you register on our website, you will no longer be anonymous to **The Practice**.
- 1.4.** We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.
- 1.5.** Website usage information may be collected using "cookies" which allows us to collect standard internet visitor usage information.

2. DEFINITION OF PERSONAL INFORMATION

- 2.1.** According to the Act "personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
 - 2.1.1.** 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;
 - 2.1.2.** information relating to the education or the medical, financial, criminal or employment history of the person;
 - 2.1.3.** any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 2.1.4.** the biometric information of the person;

- 2.1.5. the personal opinions, views or preferences of the person;
- 2.1.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- 2.1.7. the views or opinions of another individual about the person; and
- 2.1.8. 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;

3. HOW WE USE YOUR INFORMATION

- 3.1. We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or research purposes.
- 3.2. For example:
 - 3.2.1. To gather contact information;
 - 3.2.2. To confirm and verify your identity or to verify that you are an authorised user for security purposes;
 - 3.2.3. For the detection and prevention of fraud, crime, money laundering or other malpractice;
 - 3.2.4. To conduct market or customer satisfaction research or for statistical analysis;
 - 3.2.5. For audit and record keeping purposes;
 - 3.2.6. In connection with legal proceedings.

4. RETENTION OF PERSONAL INFORMATION

- 4.1. **The Practice** will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Notice. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.
- 4.2. **The Practice** will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

5. DISCLOSURE OF INFORMATION

- 5.1. We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.
- 5.2. We may also disclose your information:
 - 5.2.1. Where we have a duty or a right to disclose in terms of law or industry codes;
 - 5.2.2. Where we believe it is necessary to protect our rights.

6. INFORMATION SECURITY

6.1. We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

6.2. Our security policies and procedures cover:

6.2.1. Physical security;

6.2.2. Computer and network security;

6.2.3. Access to personal information;

6.2.4. Secure communications;

6.2.5. Security in contracting out activities or functions;

6.2.6. Retention and disposal of information;

6.2.7. Acceptable usage of personal information;

6.2.8. Governance and regulatory issues;

6.2.9. Monitoring access and usage of private information;

6.2.10. Investigating and reacting to security incidents.

6.3. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

6.4. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

7. LINKS TO OTHER SITES

7.1. Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over, and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

8. LOG DATA

8.1. We may also collect information that your browser sends whenever you visit our Service ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics. In addition, we may use third party services such as Google Analytics that collect, monitor and analyse this type of information in order to increase our Service's functionality. These third-party service providers have their own privacy policies addressing how they use such information.

9. USAGE DATA

9.1. We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type,

browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

10. LOCATION DATA

10.1. We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customise our Service.

10.2. You can enable or disable location services when you use our Service at any time by way of your device settings.

11. TRACKING COOKIES DATA

11.1. We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

11.2. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.

11.3. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.

11.4. However, if you do not accept cookies, you may not be able to use some portions of our Service.

11.5. Examples of Cookies we use:

11.5.1. Session Cookies. We use Session Cookies to operate our Service.

11.5.2. Preference Cookies. We use Preference Cookies to remember your preferences and various settings.

11.5.3. Security Cookies. We use Security Cookies for security purposes.

12. YOUR RIGHTS TO ACCESS TO INFORMATION

12.1. You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided on our website and specify what information you require. We will need a copy of your ID document and/or proof of authority to confirm your identity and authority before providing details of your personal information.

12.2. Please note that any such access request may be subject to a payment of a legally allowable fee.

13. YOUR RIGHT TO CORRECTION OF YOUR INFORMATION

13.1. You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

14. PROCESSING PERSONAL DATA UNDER GDPR

14.1. If you are from the European Economic Area (EEA), **DR AARON NDHLUNI AND DR ALANA HEYNES' PRACTICE'** legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

14.2. DR AARON NDHLUNI AND DR ALANA HEYNES' PRACTICE may process your Personal Data because:

14.2.1. We need to perform a contract with you;

14.2.2. You have given us permission to do so;

14.2.3. The processing is in our legitimate interests, and it is not overridden by your rights;

14.2.4. To comply with the law.

15. HOW TO CONTACT US

15.1. If you have any queries about this notice, need further information about our privacy practices, wish to withdraw consent, exercise preferences, access, or correct your personal information, please contact us at the numbers/addresses listed on our website.