



Privacy Policy

1. What is this document about?

This Privacy Policy stipulates how Healthcare Navigator processes your personal information. This includes why we collect information about you, the type of information we collect, how we collect it, with whom we will share it, the security measures we use to protect the information, and how you may obtain access to and correct your information. **You should read this Privacy Policy carefully. Every provision is essential and material. If something is not clear to you, please ask that it be explained to you.**

2. About Healthcare Navigator

Healthcare Navigator CC, registration number 2002/032631/23, is a close corporation registered under the laws of South Africa. It provides consulting services to stakeholders (predominantly in the healthcare industry) in South Africa and abroad.

Contact details:

Postal Address: Postnet Suite 842, Private Bag X1007, Lyttelton, 0140, Pretoria, South Africa
Telephone Number: +(27) 83 381 6428
Email address: esme@healthcarenavigator.co.za
Website address: www.healthcarenavigator.co.za

3. Information Officer

Esmé Van den Berg
Email: esme@healthcarenavigator.co.za
Telephone: www.healthcarenavigator.co.za

4. Definition of Terms

4.1 **“Data subject”** refers to the person or entity to whom the personal information relates.

- 4.2 **“Personal information”** has the meaning assigned to it in POPIA and refers to information relating to human beings and certain juristic persons. It includes information such as identity number, address, contact details, company details and confidential correspondence.
- 4.3 **“Processing”** has the meaning assigned to it in POPIA and refers to any operation or activity concerning personal information, such as the collection, receipt, recording, storage, updating, alteration, use, distribution, erasure or destruction of the information.
- 4.4 **“POPIA”** means the Protection of Personal Information Act (Act 4 of 2013) and its Regulations.
- 4.5 **“We” / “us”** refers to Healthcare Navigator.
- 4.6 **“You” / “your”** refers to the data subject (i.e., the person or entity) whose personal information is processed by Healthcare Navigator.

5. Our Commitment

We understand that your personal information is important to you. Your privacy and the security of your information are just as important to us, and we want to make sure you understand how your information will be processed. We are committed to conducting our business in accordance with the law. We will, therefore, only process, which includes collecting, using, storing or disclosing your personal information permitted by the law or otherwise with your consent. We will always strive to keep your information confidential. We take this commitment to look after your personal information seriously. We have implemented several processes to make sure that your personal information is used in the right way.

6. When You Provide Information about Another Individual / Entity

You must ensure that if you provide us personal information about any individual or entity, you may lawfully do so (e.g., with their consent). We will accept that you are acting lawfully. You should ensure that the persons (or entities) whose information you share understand how we will use and disclose their information. This is also set out in this Privacy Policy.

7. Processing of Your Personal Information

POPIA permits the processing of certain personal information for contractual purposes. We generally process the personal information listed below, if applicable in the circumstances, and retain it as part of our records:

- Names (entities/individuals), registration numbers, contact details, addresses, billing and payment details, VAT numbers, names and contact details of contact persons,
- Information relevant to the rendering of the services, the supply of products and the performance of

agreements,

- Agreements and related information,
- Invoices and statements,
- Official documentation, including newsletters and
- Correspondence.

Other personal information may be collected and processed if required in the circumstances.

8. Collection of Your Personal Information

We collect personal information directly from you when you become a client of Healthcare Navigator, send an email through our website, purchase a product or service through our website or provide information to us or when we procure a product or service from you. Information may also be collected from other sources, depending on the circumstances, such as when it is, for example, not possible to obtain the information directly from you. The information may be collected from your website or when you make information publicly available.

9. Purchasing Products and Services through our Website

If you purchased products and services through our website in the past, your information might have been submitted on the portal of Quicket, the contracted service provider until 2023. Their Privacy Policy and Terms are available at <https://www.quicket.co.za/>.

10. Purposes of Processing of Your Personal Information

We generally process your personal information for the following purposes:

- to conduct and manage our business in accordance with the law,
- for communication purposes,
- for financial management,
- for the maintenance of our records,
- for marketing purposes, if you have provided consent,
- for reporting to persons and bodies, as required and authorised in terms of the law or by you,
- for procurement purposes,
- for historical, statistical and research purposes,
- for enforcement of the business' rights and/or

- for any other lawful purpose related to the activities of our business.

11. Consent

If you must consent to processing your personal information, you may withdraw your consent at any time. This does not affect the processing of personal information that has already occurred. If you withdraw your consent, your personal information will only be processed as the law provides. This may impact the services that you require from us. This will be discussed with you at the time if necessary.

12. Objection to Processing

When we process your personal information to protect your legitimate interests or based on the legitimate interests of the business or those of a third party to whom we supply the information, you may object to our processing if it is reasonable to do so. This must occur on the form prescribed by POPIA, available from the Information Officer. This does not affect your personal information, which we have already processed. If you object and we agree with your objection, your personal information will only be processed as the law permits.

13. Disclosure of Your Personal Information

We will share only relevant personal information about you with the persons and entities specified below if it is necessary and lawful in the circumstances:

- Our insurers,
- Our professional and legal advisers,
- Our accountants and auditors,
- Law enforcement structures, including courts and tribunals and
- Regulatory and other public or private bodies, persons or entities, as may be required or permitted in terms of the law, including to comply with any legal obligation or to protect the rights, property or safety of our business, the public or others.

14. Record-Keeping

We maintain records of your personal information in South Africa for as long as it is necessary for lawful purposes related to conducting our business, including performing and enforcing agreements, complying with

legal obligations and for historical, statistical and research purposes subject to the provisions of the law. Information is processed and stored by using the Microsoft 365 cloud. Invoice details are stored on Sage Online (<https://www.sage.com/en-za/>).

15. Information Sent Across the Borders of the Republic of South Africa

We process and store your information in records within the Republic of South Africa. Backups are stored on Microsoft 365. Microsoft's servers might be located outside of South Africa. Invoices are stored on Sage Online (<https://www.sage.com/en-za/>). If we must provide your personal information to any third party in another country, we will obtain your prior consent unless such information may be lawfully provided to that third party.

16. Security of Your Personal Information

We are committed to ensuring the security of your personal information to protect it from unauthorised processing and access as well as loss, damage or unauthorised destruction. We continually review and update our information protection measures to ensure your information's security, integrity, and confidentiality, following industry best practices. We will inform you and the Information Regulator if any person has unlawfully obtained access to your personal information, subject to the provisions of the law.

17. Right to Access Your Personal Information

You have the right to request access to your personal information in our possession or under our control and information of third parties to whom we supplied that information subject to restrictions imposed in legislation. If you wish to exercise this right, please complete the prescribed form from the Information Officer. Costs may apply to such requests, which can be obtained from the Information Officer. Please consult our PAIA Manual for further information.

18. Accuracy of Your Personal Information

We must always have accurate information about you on record, as it could impact our communication and the performance of our agreements. Therefore, you must inform us as soon as your information changes. You may also request that we correct or delete any information. Such a request must be made in writing on the prescribed form available from the Information Officer. You must provide sufficient detail to identify the information and the correction or deletion required. Information will only be corrected or deleted if we agree that the information is

incorrect or should be deleted. It may not be possible to delete all the information if we may lawfully retain it. Please contact the Information Officer to discuss how we can assist you with your request. If we correct any information, and the corrected information will impact any decision made about you, we will send the corrected information to persons to whom the information has been disclosed in the past if they should be aware of the changed information.

19. Changes to this Privacy Policy

In our sole and absolute discretion, we reserve the right to revise or supplement this Privacy Policy from time to time to reflect, amongst others, any changes in our business or the law. We will publish the updated Privacy Policy on our website. Any revised version of the Policy will be effective as of the date of posting on the website, so you should always refer back to the website for the latest version of the Policy. **You are responsible for ensuring you are satisfied with any changes before continuing to use our services.** If you have any questions concerning this Policy, please contact our Information Officer.

20. Enquiries, Concerns and Complaints

All enquiries, requests or concerns regarding this Policy or relating to the business's processing of your personal information should be addressed to the Information Officer. You may also complain to the Information Regulator at POPIAcomplaints.IR@infoeregulator.org.za (violation of personal information) or PAIAComplaints.IR@infoeregulator.org.za (access to record requests). We would appreciate it if you would allow us to consider your complaint before you approach the Information Regulator.

21. Laws Applicable to this Privacy Policy

This Privacy Policy is governed by the laws of the Republic of South Africa and is subject to the jurisdiction of the South African courts.