

Introduction

Healthbridge, a division of (Tradebridge (Proprietary) Limited) ("Us", "We", "Our") operates www.healthbridge.co.za, certain social media sites (collectively referred to as "sites") and other Healthbridge Services that are accessible through the internet ("Services") and is committed to protecting your privacy and complying with applicable data protection and privacy laws. This Privacy Policy will inform you as to how we process your Personal Information and tell you about your privacy rights and how the law protects you (as data subject).

It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your Personal Information. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

By submitting Personal Information to us it will be seen as your consent to us to process your Personal Information. Reference to "consent", "your consent", "your explicit consent" or "informed consent" shall include the clicking on a "submit" or "Login" or "I agree" button or reply on an email after you have been made aware of the reference to this Privacy Policy.

1. Who we are and other important information

1.1. Purpose of this Privacy Policy

- 1.1.1. This Privacy Policy aims to give you information on how Healthbridge collects and processes Personal Information through your use of our sites or any other Healthbridge Services, including any data you may provide when you register as a user, purchase a product or service, take part in a competition or promotion or Personal Information we process when you send to us or receive from us other electronic communications (i.e. emails or LinkedIn). Healthbridge shall take all reasonable steps to protect the Personal Information of users.
- 1.1.2. It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Information about you so that you are fully aware of how and why we are using your Personal Information. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

1.2. Responsible Party

- 1.2.1. Where you use our sites and register as a user of any of our Services, Healthbridge is the Responsible Party and responsible for Processing of your Personal Information.
- 1.2.2. Where you use our Services (and associated software) for your business, internally and to engage with your customers/patients and Process their information, you will act as the Responsible Party and Healthbridge as the Operator acting on your instructions, in terms of the Processing of your customer/patient Personal information. As Responsible Party you have sole responsibility for the legality, reliability, integrity, accuracy and quality of the Personal Information you or someone on your behalf make available to the Healthbridge Services (including the Personal Information and Special personal Information of your clients/patients).
- 1.2.3. Where you (as patient) use our services to engage with your Practitioner we act as Operator on behalf of your Practitioner who is acting as Responsible Party in his/her relationship with you as his/her patient.
- 1.2.4. We have appointed an information officer (IO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests, please contact the IO on: dataprotection@healthbridge.co.za or Pin Oak House, Ballyoaks Office Park, 35 Ballyclare Drive, Bryanston, 2191 or Telephone number: +27 860 200 222.
- 1.2.5. If wish to submit a complaint about the processing of your Personal Information by your Practitioner, then we recommend that you contact your Practitioner directly.
- 1.2.6. You have the right to make a complaint at any time to the Information Regulator's office (IR), the Republic of South Africa's authority for data protection issues (<http://www.justice.gov.za/infoereg/>). We would, however, appreciate the chance to deal with your concerns before you approach the IR, so please contact us in the first instance.

1.3. Changes to the Privacy Policy and your duty to inform us of changes

- 1.3.1. We keep our Privacy Policy under regular review. Archived versions (if available) can be obtained by contacting us. Any changes made to our Privacy Policy in future will be posted on our website or made available during your engagement with Healthbridge (including access to the Services). The new version will apply the moment it is published on our website or incorporated by reference in any of our Terms of Services or other communications or published on our Services.
- 1.3.2. It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us.

1.4. **Integration into other sites:** This Privacy Policy applies to Healthbridge sites and Services only. We do not exercise control over third party sites who provide Healthbridge Services as part of their own offering (including Bureaus and/or Business Partners). These other third party sites may place their own cookies or other files on your computer, collect data or solicit Personal Information from you. We cannot be held responsible for any wrongful handling of end users' information by our customers.

1.5. **Third-party links:** Our sites or certain of our Services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. If you disclose your Personal Information to a third-party, such as an entity which operates a website linked to any Healthbridge Services, Healthbridge SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD-PARTY. This is because we do not regulate or control how that third-party uses your personal information. You should always ensure that you read the privacy policy of any third-party. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

- 2.1. **Personal Information means the information as per the Definitions. It does not include data where the identity has been removed (anonymous data).**
- 2.2. We may collect, use, store and transfer different kinds of Personal Information **about you** which we have grouped together.
 - 2.2.1. **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
 - 2.2.2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
 - 2.2.3. **Financial Data** includes payment card details.
 - 2.2.4. **Transaction Data** includes details about payments to and from you and other details of Goods and services you have purchased from us.
 - 2.2.5. **Technical Data** includes 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 this website.
 - 2.2.6. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
 - 2.2.7. **Usage Data** includes information about how you use our website, products and Services. This information shall include the full Uniform Resource Locators (URL) Clickstream to, through and from our website (including the date and time) and the services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number used to call our customer service number, service transaction instructions from and to you via our APIs.
 - 2.2.8. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
 - 2.2.9. **Medical Information (Personal Information and Special Personal Information):** includes physical or mental health, well-being, disability, medical history, biometric information and other similar information.
- 2.3. We also collect, use and share **Aggregated Data** and pattern data such as (but not limited to) statistical or demographic data or service and/or goods transactional data for any purpose ("Pattern Data"). Aggregated Data or Pattern Data could be derived from your Personal Information but is not considered Personal Information in law as this data will **not** directly or indirectly reveal your (the data subject's) identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or executing a specific transaction type. However, if we combine or connect Aggregated Data or Pattern Data with your Personal Information so that it can directly or indirectly identify you, we will treat the combined data as Personal Information which will be used in accordance with this privacy policy.
- 2.4. You may choose to provide additional Personal Information to us, in which event you agree to provide accurate and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.
- 2.5. **We do not collect any Special Personal Information directly.** Special Personal Information is made available to us by a Practitioner that utilises our Services. We will process same in accordance with his/her instructions and Data Protection Laws as an Operator.
- 2.6. **Submission of Personal Information on behalf of another: If you provide information on behalf of someone else (including but not limited to patient data / clinical data), then it is your responsibility to obtain the necessary consent from the person before making the Personal Information available to us. On receipt of the Personal Information, we assume that the necessary consent has been obtained and will process the Personal Information as per your instructions and in accordance with this Privacy Policy. By submitting such Personal Information on behalf of another person, you indemnify us against any third-party claim, where such third-party claim relates to Personal Information that has been processed without the necessary consent or other available exception allowed by law.**
- 2.7. **If you fail to provide Personal Information:** Where we need to collect Personal Information by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services (including services for no charge)). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

3. How is Personal Information collected?

We use different methods to collect data from and about you including through:

- 3.1. **Direct interactions.** You may give Healthbridge your Identity and Contact Data by filling in forms or by corresponding with us by phone, email or otherwise. This includes Personal Information you provide when you register for our Services;
 - 3.1.1. create an account online / register with us with us for purposes of our Services;
 - 3.1.2. use any of our Services functions
 - 3.1.3. subscribe to our newsletters (where applicable);
 - 3.1.4. request marketing to be sent to you;
 - 3.1.5. enter a competition, promotion or survey; or
 - 3.1.6. give us feedback or contact us.

- 3.2. **Automated technologies or interactions.** As you (including your authorised users of our Services) interact with our Services or website, we will automatically collect Technical Data about your equipment, browsing actions, patterns and device. We collect this Personal Information by using cookies (see section 4) below), server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- 3.3. **Third parties or publicly available sources.** We will receive Personal Information about you from various third parties and public sources as set out below:
 - 3.3.1. Technical Data from the following parties:
 - 3.3.1.1. analytics providers such as Google ("How Google uses information from sites or apps that use our services", (located at <https://policies.google.com/technologies/partner-sites>))
 - 3.3.1.2. advertising networks; and
 - 3.3.1.3. search information providers.
 - 3.3.2. Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
 - 3.3.3. Technical and Transactional Data from third party service providers that provide a service or product to you, subject to your consent to us to collect the information.
 - 3.3.4. Identity and Contact Data from data brokers or aggregators.
 - 3.3.5. Identity and Contact Data from publicly available sources such as CIPC.
- 3.4. **Where we act as Operator for your Practitioner:** Identity, Contact and Medical Information as uploaded to our Services by your Practitioner and instructed to Process same as per the Practitioner's instructions.

4. Cookies

- 4.1. Our website makes use of cookies to help us understand our users better. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies do not harm your computer or any files on your computer. Depending on the type of cookie we use, cookies also allow us to make our websites more user friendly.
- 4.2. Healthbridge may use third party vendors, including but not limited to Google and MSN/ Bing to show Healthbridge-related ads on sites on the internet. Third party vendors use cookies to serve ads based on a user's prior visits to Our sites or other websites. Users may opt-out of Google's use of cookies by visiting the Google Advertising Settings Page or the Network Advertising Initiative's opt-out page for other third-party vendors' use of cookies.
- 4.3. You should be able to adjust your browser so that your computer does not accept cookies. If you do this, you will still be able to browse the website but the functions that allow you to access an existing account or page that requires a username or password will not be available.
- 4.4. You can, alternatively, adjust your browser to notify you when a website attempts to put a cookie on your computer. How you adjust your browser to stop it accepting, or to notify you of, cookies will depend on the type of internet browser programme your computer uses.
- 4.5. Please remember, cookies do not contain Identity, Contacts or Financial Information. We do not exchange cookies with any third-party websites or external data suppliers.

5. How we use your Personal Information

- 5.1. We will not sell your Personal Information.
- 5.2. We will only use Personal Information within the framework of the law. Most commonly, we will use Personal Information in the following circumstances:
 - 5.2.1. Where you have given us your consent; or
 - 5.2.2. Where we need to perform the contract, we are about to enter into or have entered into with you or your Practitioner; or
 - 5.2.3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
 - 5.2.4. Where we need to comply with a legal obligation.
- 5.3. You have the right to withdraw consent to marketing at any time by contacting us or using such automated facilities made available by us.
- 5.4. **Purposes for which we will use Personal Information**
 - 5.4.1. We have set out below, in a table format, a description of all the ways we plan to use Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
 - 5.4.2. Note that we may process Personal Information for more than one lawful ground depending on the specific purpose for which we are using the data. Please contact us if you need details about the specific legal ground, we are relying on to process your Personal Information where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer/user of our Services, including but not limited to Telehealth Services	(a) Identity, (b) Contact (b) Biometric data (c) Special Personal Information	Performance of a contract with you Performance of contract with your doctor
To make a booking for purposes of Telehealth and to remind you.	(d) Identity, b) Contact	Performance of a contract with you and your doctor
Processing of Personal Information made available by our customer (i.e. health care practitioner or its Practice) on our Services.	Identity, Contact, Financial, other Personal Information and Medical Information	To execute Processing as per contract with Practitioner/customer of our Services.
To process your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) TAKE NOTE: we do not store Financial Information - card details. We use third party service provider(s) to execute transactions where you use your card. You should read their privacy policy
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity, (b) Contact, (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To enable you to partake in a prize draw, competition, promotion or complete a survey	(a) Identity, (b) Contact, (c) Profile (d) Usage, (e) Marketing and Communications	(a) Performance of a contract with you, (b) You consent by submitting your information to us, specifically for competitions and promotions (c) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business, website and other Service/ electronic platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity, (b) Contact, (c) Profile (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)

5.5. **Marketing:** We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising.

5.5.1. Promotional offers from us

- 5.5.1.1. Once you have acquired any of our Services or access any of our Services (i.e. Telehealth) including accessing our websites, you will be seen as a customer of Healthbridge.
- 5.5.1.2. As a customer we may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and offers may be relevant for you (we call this marketing).
- 5.5.1.3. As a customer you will receive marketing communications from us if you have not opted out of receiving that marketing.
- 5.5.1.4. As a potential customer you may also receive certain information about Healthbridge and its Services/products, however you will always have the option to unsubscribe to said communications (see par. 5.5.3 below).

5.5.2. Third-party marketing

- 5.5.2.1. We will get your express opt-in consent before we share your Personal Information with any third party for marketing purposes.
- 5.5.2.2. **TAKE NOTE:** We may provide (without your consent) third party marketing parties/advertisers with anonymous aggregate information (Aggregate Data (see above)) about our users (for example, we may inform them that 500 men aged under 30 have clicked on a specific product or advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a specific region). We may make use of the Personal Information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. **IMPORTANT: We do not disclose information about identifiable individuals to our advertisers.**

5.5.3. Opting out

- 5.5.3.1. You can ask us or third parties to stop sending you marketing messages at any time by logging into the website or unsubscribe on the email communication or by contacting us at any time and requesting to opt-out of our marketing services.
- 5.5.3.2. Where you opt out of receiving these marketing messages, this will not apply to Personal Information provided to us as a result of a service purchase, warranty registration, service experience or other transactions.
- 5.5.3.3. **Cookies:** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

5.5.4. Change of purpose

- 5.5.4.1. We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- 5.5.4.2. If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 5.5.4.3. Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of Personal Information

- 6.1. We may share Personal Information with the parties set out below for the purposes set out in the table above.
 - 6.1.1. **Internal Third Parties** as set out in the Definitions. Where we share Personal Information to our group (collaborating companies), we ensure your Personal Information is protected by requiring all our collaborating companies to follow this policy when processing your Personal Information. We limit the sharing of Medical Information.
 - 6.1.2. **External third parties** as set out in the Definitions.
 - 6.1.3. Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information in the same way as set out in this Privacy Policy.
- 6.2. We require all third parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.
- 6.3. Where we act as Operator as per instructions from the Practitioner, we only disclose Personal Information as per our instructions from the Practitioner or its Practice with agreement that the Practitioner or Practice has obtained its customers/patients' consent. The only parties with direct access to your Personal Information and medical information are your healthcare practitioner and his/her authorised users, given access by him/her. Your healthcare practitioner may share your Personal Information with other healthcare practitioners' subject to your consent.

7. International transfers

- 7.1. Some of our external third parties may be based outside your country so their processing of your Personal Information could involve a transfer of data outside your country.
- 7.2. Whenever we transfer your Personal Information out of your country, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - 7.2.1. We will only transfer your Personal Information to countries that have appropriate data protection and privacy legislation to protect your Personal Information.
 - 7.2.2. Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Information is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organisational measures to protect your Personal Information.
 - 7.2.3. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide protection to Personal Information similar to the principles under the GDPR, which we believe are good principles to ensure compliance.
- 7.3. By submitting your Personal Information to us you consent to the transfer of your Personal Information outside the borders of the Republic of South Africa.

8. Data security

- 8.1. We have put in place appropriate technological and organisational measures to prevent Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process Personal Information on our instructions, and they are subject to a duty of confidentiality.
- 8.2. We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will we use your Personal Information for?

- 9.1. We will only retain your Personal Information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you or any claim as a result of you not obtaining the required consent as per par.2.6 above.
- 9.2. To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 9.3. By law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for five years after they cease being customers for tax purposes. Some laws require to retain certain records that may contain Personal Information for longer periods.
- 9.4. We act as Operator we retain the personal Information as per instructions from our customer/Practitioner;
- 9.5. In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.
- 9.6. In some circumstances we will anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Social Media

- 10.1. Our sites or Services may, in certain circumstances, provide you with social plug-ins from various social media networks. If you choose to interact with a social network such as Facebook or LinkedIn (for example by registering an account or click on the link from our site), your activity on our sites will also be made available to that social network. This is necessary for the performance of your contract with Us which allows you to interact with a social network. If you are logged in on one of these social networks during your visit to one of our sites or are interacting with one of the social plug-ins, the social network might add this information to your respective profile on this network based on your privacy settings. If you would like to prevent this type of information transfer, please log out of your social network account before you enter one of our sites, or change the necessary privacy settings, where possible.
- 10.2. Communication, engagement and actions taken through external social media networks that we participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.
- 10.3. You are advised to use social media networks wisely and communicate/engage with them with due care and caution in regard to their own privacy policies (if any). **PLEASE NOTE: WE WILL NEVER ASK FOR PERSONAL OR SENSITIVE INFORMATION THROUGH SOCIAL MEDIA NETWORKS AND ENCOURAGE USERS, WISHING TO DISCUSS SENSITIVE DETAILS OR TO RESOLVE ISSUES/CONCERNS, TO CONTACT US THROUGH PRIMARY COMMUNICATION CHANNELS SUCH AS BY TELEPHONE OR EMAIL.**
- 10.4. Our social media network page(s) may share web links to relevant web pages. By default, some social media platforms shorten lengthy URL's. You are advised to exercise caution and due care before clicking on any shortened URL's published on social media platforms by this website. Despite our best efforts to ensure that only genuine URL's are published many social media platforms are prone to spam and hacking and therefore our website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

11. Your legal rights

- 11.1. Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Information:
- 11.1.1. **Request access** to Personal Information (commonly known as a "data subject access request"). There may be a fee associated with this request – see below. This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
 - 11.1.2. **Request correction** of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - 11.1.3. **Request erasure** of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Take Note: Erasure of your Personal Information shall further not limit our rights in terms of Aggregate Data and Pattern Data
 - 11.1.4. **Object to processing** of your Personal Information where we are relying on 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. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
 - 11.1.5. **Request restriction** of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios:
 - 11.1.5.1. If you want us to establish the data's accuracy.
 - 11.1.5.2. Where our use of the data is unlawful, but you do not want us to erase it.
 - 11.1.5.3. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - 11.1.5.4. You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
 - 11.1.6. **Request the transfer** of your Personal Information to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Contact us if you need to transfer your Personal Information.
 - 11.1.7. **Withdraw consent** at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- 11.2. **If you wish to exercise any of the rights set out above, please contact us at the details mentioned par. 1.1.3 above.**
- 11.3. **Fee required:** Apart from any prescribed fees under any applicable data protection legislation, you will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- 11.4. **What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 11.5. **Time limit to respond:** We try to respond to all legitimate requests within 30 (thirty) days. Occasionally it could take us longer than 30 (thirty) days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- 11.6. If Personal Information pertaining to you as an individual has been submitted to us by a Practitioner and you wish to exercise any rights you may have to access, correct, amend, or delete such data, please inquire directly with the Practitioner. We have limited access to data our customers (Practitioners) submit to our Services, if you wish to make your request directly to us, please provide details of the Practitioner who submitted your Personal Information to our Services. We will refer your request to that Practitioner, and will support them as needed in responding to your request.

12. Definitions

- 12.1. **Data Protection Laws** means any and all applicable laws relating to the protection of data or of Personal Information and shall include the Protection of Personal Information as per the POPI Act and General Data Protection Regulations (GDPR);
- 12.2. **Data Subject** means the person to whom Personal Information relates and, in this document, refers to you, as the party providing Personal Information that will be processed by Healthbridge or a relevant third party.

- 12.3. **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- 12.4. **Practitioner:** means a person (natural or juristic) registered as a health care practitioner;
- 12.5. **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 12.6. **Personal Information** means information as defined in the protection of Personal information Act of 2013 (**[POPI Act](#)** (click on link to view));
- 12.7. **Process** means processing as defined under the POPI Act;
- 12.8. **Responsible Party:** means a party as defined in the **POPI Act (click on link to view)**;
- 12.9. **Special Personal Information** means **as defined in the POPI Act (click on link to view)**.
- 12.9. **THIRD PARTIES**
- 12.9.1. **Internal Third Parties:** Other companies in the Healthbridge group (if applicable), acting as joint responsible parties or Operators and who may also provide IT and system administration services and undertake leadership reporting.
- 12.9.2. **External Third Parties**
- 12.9.2.1. Service providers acting as operators who provide IT and system administration services or such service providers that assist us in detecting, preventing, or otherwise address fraud, security or technical issues.
- 12.9.2.2. Service Providers integrated into the Healthbridge Services as notified to you and where you have given us or your Practitioner the required authorisation to obtain information from or to submit information to, including but not limited to pathology reports, electronic remittance advises and debit orders for purposes of payments or ICD-10 codes to medical
- 12.9.2.3. Other health care practitioners or health care services providers as per instructions from your Practitioner (where we act as Operator), i.e. referral by Practitioner to a third-party specialist.
- 12.9.2.4. Professional advisers acting as operators or joint Responsible Parties, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- 12.9.2.5. The Revenue Services, regulators and other authorities acting as operators or joint Responsible Parties who require reporting of processing activities in certain circumstances.
- 12.9.2.6. Court of law or any other authority where we have an obligation under law to share your Personal Information;
- 12.9.2.7. In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets. Sharing of information will exclude Medical Information