

CALEY CHIROPRACTIC PTY LTD

COMPLIANCE MANUAL

FOR THE IMPLEMENTATION OF THE

PROTECTION OF PERSONAL INFORMATION ACT OF 2013

WHAT IS PERSONAL INFORMATION?

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:

- 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;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- 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;
- the views or opinions of another individual about the person; and 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.

WHAT PERSONAL INFORMATION IS COLLECTED?

When you visit, browse, register, or interact through this practice or the practice's website, the following personal information about you may be collected:

- Name and Surname
- ID/Passport Number
- Contact details
- Email address
- Location
- Health information
- Information relating to your computer's Internet Protocol (IP) address, browser type, browser version, the pages of our website that you visit, the date and time of your visit, the duration of time spent on the website pages, and other applicable statistics.

Personal information may also be collected from you directly during your intake consultation, or ongoing consultations.

Where the law requires that information regarding certain diseases be notified to the authorities, this practice will do so without delay.

This practice may also collect, use and share aggregated data such as statistical or demographic data for any purpose.

Aggregated data may be derived from your personal information, but is not considered personal information in law as this information does not, directly or indirectly, reveal your identity.

PURPOSES FOR WHICH THIS PRACTICE USES YOUR PERSONAL INFORMATION

Any information collected from you may be processed for, amongst others, the following purposes:

- a) To provide you with healthcare treatment or services;
- b) To make an online appointment;
- c) To assess your health condition;
- d) To assess any medical treatment you may require;
- e) To process any enquiry;
- f) For statistical and research purposes;
- g) To diagnose and attend to technical issues, support and user queries;
- h) To comply with legislative requirements;
- i) To process your application for a vacancy; or
- j) To detect, prevent or deal with actual or alleged fraud, security breach, or the abuse, misuse or unauthorised use of the website and/or contravention of this Privacy Policy.

CATEGORIES OF PERSONAL INFORMATION

This practice processes many different categories of personal information including, but not limited to:

- Contact details, such as phone numbers, physical and postal addresses, and email addresses;
- Personal details, such as names, family information, and ages;
- Demographic details, such as race and age groups;
- Health information;
- In some cases biometric information;
- Financial information, such as account numbers;
- Special personal information as it may relate to your medical treatment;

- Market intelligence information that may relate to your well-being;
- Medical scheme information; and Background information.

PROTECTION OF YOUR PERSONAL INFORMATION

This practice takes the security of your personal information very seriously.

This practice recognises the vital role that information technology plays in its daily operations, and the reliance placed on IT systems in processing personal information.

Although absolute security cannot be guaranteed, this practice will take reasonable technical and organisational measures to protect your personal information against accidental, unauthorised or intentional manipulation, loss, misuse, destruction, disclosure or access.

This practice's security measures are regularly verified for its operating effectiveness.

Reasonable mechanisms, tools and technologies have been implemented to detect, prevent and respond to security violations. Information security policies and procedures that govern security safeguards are in place, including dedicated teams and business processes to govern instances of non-compliance with privacy policies, procedures or applicable law.

DISCLOSURE OF YOUR PERSONAL INFORMATION

This practice may disclose your personal information if authorised to do so by law.

This practice also engages with various third parties, to improve its service, create efficiency in its operations, and contribute towards the overall wellbeing of users and patients.

This practice will share your personal information if:

- you have provided consent;
- it is for the proper treatment and care of yourself; and/or
- it is in accordance with applicable law.

When this practice shares your information with any third party, they will be required to respect your right to privacy and this practice will ensure that we have the necessary safeguards in place to secure your personal information.

This practice will only allow third parties to process your personal information for a specific purpose, in accordance with this practice's instructions and applicable law.

RETENTION OF YOUR PERSONAL INFORMATION

This practice may retain all personal information that is collected from you, as long as it remains necessary for the purposes for which it was collected unless there is a valid technical, legal or business reason for it to be deleted, destroyed or to de-identify it.

Records remain active for eight years post last treatment or for as long as it is required by law; if it is required by a code of conduct; if it is reasonably needed for lawful purposes related to this practice's functions and activities; or it is reasonably needed for evidentiary purposes.

Records shall only be made available in accordance with the Promotion to Access of Information Act 2 of 2000, and you can [read Caley Chiropractic's PIA Manual by clicking here](#).

DIRECT MARKETING

This practice does not use data for marketing purposes, however to ensure continuous improvement of the care and service offering, patients may be asked to complete service experience questionnaires.

STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION

This practice stores your personal information on its servers and/or on third party servers.

This practice reserves the right to transfer to and/or store your personal information on servers in a jurisdiction other than where it was collected. If the location where personal information is transferred to does not have substantially similar laws which provide for the protection of personal information, this practice will take reasonably practicable steps to ensure that your personal information is adequately protected in that jurisdiction.

COOKIES

When using the practice's website, this practice uses Cookies to understand your online activity, and save your preference for future visits.

A cookie is a small piece of data sent from our website to your computer or device or internet browser where it is saved.

The cookie contains information to personalize your experience on this practice's website and applications.

The cookie has the ability to identify your device, computer or smartphone.

By using this practice's website and applications you agree that cookies may be forwarded from the relevant website or application to your computer or device.

This practice may use the cookie to confirm that you visited the website.

You have the right to choose whether or not to accept cookies. However, please note that if you do not accept the cookies, you may not be able to use the full functionality of the website or mobile applications.

When you interact with this practice's website, you will come across links to other websites and applications.

This practice is not responsible for the security of those websites, or the information that it contains. In some cases, links are provided as a value added service for information purposes only. Please remember that when you click on a link on the practice's website and you are taken to another web page or website or application that this Privacy Policy will no longer apply.

You also acknowledge that by clicking on a link, that you do so at your own risk and hold this practice harmless against any loss or damage that may occur.

PROCESSING OF CHILDREN'S INFORMATION

This practice respects the rights of children and will only process the personal information of children if the consent of a competent person has been obtained, or if required to do so by law.

PURPOSE STATEMENT

Your personal information as well as your health records (with your consent) may be exchanged with your other healthcare providers and/or your medical schemes (while complying with applicable privacy and data protection legislation):

When you attend at this practice we will first request

- to improve patients treatment and healthcare outcomes by sharing clinical information in a secured way among healthcare professionals and healthcare service providers;

- to facilitate healthcare system cost savings and
- to improve the quality, safety and efficiency of the healthcare a consumer receives through an increased administrative and clinical information interchange process whilst still protecting consumer privacy.

CHANGES TO THIS PRIVACY POLICY

From time to time, changes will be required to this Privacy Policy. Please check this website to inform yourself of any changes made to this Privacy Policy.

YOUR RIGHTS

This practice will, at all times, process your personal information in accordance with applicable laws and your rights are set out below:

- You have the right to correct your personal information if it is incorrect;
- You have the right to update your personal information if your details have changed;
- You have the right to object to the processing of your personal information;
- You have the right to your personal information being deleted; and
- You have the right to be informed if your information has been deleted. If you would like to exercise any of your rights:
- Submit any objection that you may have; or
- Request destruction of your personal information if it is being retained for longer than required by law;

You acknowledge that, in some cases, this practice may not be able to comply with your request to delete or destroy your personal information if this request conflicts with applicable law.

INFORMATION REGULATOR

You have the right to complain to the Information Regulator, whose contact details are:

Information Regulator

Tel : (012) 406 4848

Fax : 086 500 3351

Email : Inforeg@justice.gov.za

IMPORTANT INFORMATION

If you have any questions regarding the contents of this policy you may address those concerns in writing to:

Information Officer: Dr Glenn Caley, DC

Tel: +27 (0) 60 312 4567

Email: drglenn@caleychiropractic.com

DECLARATION

By clicking on the link to read this page, you are declaring that:

- You have read the contents of this policy;
- You understood the contents of this policy;
- You are in agreement with the contents of this policy;
- You have no objections to your personal information being managed in this way by the practice and
- You have no questions regarding the contents of this policy.