

SpesNet Group (Pty) Ltd: Privacy Policy

Please read this Privacy Policy carefully to understand how your personal information will be handled by SpesNet Group (Pty) Ltd. Every term of this Policy is material.

1. ABOUT SPESNET GROUP (PTY) LTD

SpesNet Group (Pty) Ltd (SpesNet Group) provides leading-edge healthcare solutions for healthcare providers, medical insurers, administrators and managed care organisations using a combination of technology solutions, healthcare and artificial intelligence. SpesNet Group forms part of the SpesNet Global Group of Companies, which has offices in South Africa, Singapore, Indonesia, the Philippines and the United States of America.

Our contact details:

Address: Block 2, Crossway Office Park, 240 Lenchen Ave, Centurion, 0157
P.O. Box 8630, Centurion, 0046
E-mail: info@spesnetgroup.co.za
Telephone: 012 6830360
Website: <http://www.spesnetgroup.com>

2. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER

Our Information Officer is:

Mr. Ross Olver

E-mail: informationofficer@spesnet.co.za
Telephone: 012 110 4167

Our Deputy Information Officer is:

Theo Potgieter

E-mail: informationofficer@spesnet.co.za
Telephone: 012 110 4146

3. EXPLANATION OF TERMS USED

The following terms have the meanings assigned to them in this Privacy Policy unless the context requires otherwise:

- 3.1 “Board” refers to the Board of Directors of SpesNet Group (Pty) Ltd.
- 3.2 “Data subject” has the meaning assigned to it in POPIA and refers to the person to whom the personal information relates and includes both natural and juristic persons.
- 3.3 “SpesNet Group” refers to SpesNet Group (Pty) Ltd, a private company duly incorporated under the laws of South Africa with registration number 2003/009262/07.
- 3.4 “Client” refers to a person or an entity that has entered into an agreement with SpesNet Group to supply it with services.
- 3.5 “Member” refers to a person who has been admitted as a member of SpesNet Group and “membership” has a corresponding meaning.
- 3.6 “Officer” refers to a member of the Board or any Committee of SpesNet Group.
- 3.7 “PAIA” refers to the Promotion of Access to Information Act (Act 2 of 2000) and the Regulations issued in terms thereof.
- 3.8 “PAIA Manual” refers to the Manual compiled by SpesNet Group in terms of section 51 of PAIA.
- 3.9 “Personal information” has the meaning assigned to it in POPIA and refers to information relating to living human beings and existing juristic persons. It includes information such as race, gender, age, medical information, identity number, contact details and confidential correspondence and “information” has a corresponding meaning.
- 3.10 “POPIA” means the Protection of Personal Information Act (Act 4 of 2013) and the Regulations issued in terms thereof.
- 3.11 “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 and “process” has a corresponding meaning.
- 3.12 “We” / “us” refers to SpesNet Group.
- 3.13 “Website” means <http://www.spesnetgroup.com>
- 3.14 “You” / “your” refers to the data subject whose personal information is processed by SpesNet Group.

4. APPLICATION OF THE PRIVACY POLICY

This Privacy Policy applies to personal information that we have in our possession or under our control and personal information that we collect or receive from or about you. It stipulates, amongst others, how we collect the information, the type of information collected, why that information is collected, the circumstances under which that information will be shared with others, the security measures that we have implemented to protect the information and how you may obtain access to and correct your information. We process personal information on behalf of and for our clients and members in terms of written agreements. This information may also relate to clients' or members' data subjects, such as patients. If you are a patient or another data subject of one of our clients, you should refer to their privacy policies or related documentation, which is independent of this Privacy Policy, for further information in respect of the personal information that they collect and process.

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 collect, use, store or disclose, your personal information in accordance with the law or otherwise with your consent and will always strive to keep your information confidential. We take this commitment to look after your personal information seriously. We have implemented a number of processes to make sure that your personal information is used in the right way.

We apply the following principles in order to protect your privacy:

- We only collect the personal information that is necessary;
- We only use personal information for the purposes specified in this Privacy Policy unless you are advised otherwise;
- We do not keep personal information longer than needed for lawful purposes; and
- We only share your personal information as specified in this Privacy Policy and/or permitted in terms of the law or otherwise as agreed with you.

6. WHEN YOU PROVIDE PERSONAL INFORMATION ABOUT ANOTHER INDIVIDUAL / ENTITY

You must make sure that if you provide personal information about any individual or entity to us, you may lawfully do so (e.g., with their consent). We will accept that you are acting lawfully. You should make sure that they are familiar with this Privacy Policy and understand how we will use and disclose their information.

7. COLLECTION OF YOUR PERSONAL INFORMATION

We collect personal information directly from you when you become a member or client of SpesNet Group, when you supply information on our website, when you provide information to us or when another person or entity provides information about you to us. Information may also be collected from other sources (e.g., public records), depending on the circumstances, when it is, for example, not possible to obtain the information directly from you, or, you make information publicly available. Healthcare practitioner information is, amongst others collected from Medpages, other publicly available sources or “paid-for” subscription services. Telephone calls with external callers, virtual meetings (video feed) and CCTV footage of all visitors to our offices are recorded. The information that we collect is necessary to provide client and membership or other services to fulfil the objects of SpesNet Group and discharge its responsibilities in terms of agreements entered into with clients.

8. PROCESSING OF YOUR PERSONAL INFORMATION

There are various laws that permit the processing of personal information such as POPIA. We generally process the personal information listed below, if applicable in the circumstances, and retain it as part of our records. Telephone calls with external callers, virtual meetings (video feed) and CCTV footage of all visitors to our offices are recorded. Other personal information may be collected and processed, if it is required in the circumstances.

Society and Association Clients

- Organisation name, addresses and contact details;
- Names, surnames, titles and contact details of executives, employees and contact persons;
- Invoices and payment information;

- All the information included in proposals and agreements;
- Governance-related information (such as minutes of meetings, standard operating procedures and policies);
- Records related to the performance of services; and
- Correspondence.

SpesNet Group Members

- Full names and surnames, titles, identity numbers, addresses, contact details, qualifications, disciplines, statutory council registration numbers and practice numbers;
- Bank details;
- Invoices and payment information;
- Information of data subjects (such as patients) of members as set out below; and
- Correspondence.

Patients of Members (when rendering services on behalf of Members in terms of written agreements):

- Full names and surnames, titles, identity numbers, dates of birth, age, gender, addresses, contact details, marital status, and funders' (e.g., medical scheme / Compensation Commissioner for Occupational Diseases and Injuries) details;
- Injury-on-duty patients – additional information processed: Claim numbers, funders, treating and referring providers, places of treatment, personnel numbers, occupations, file numbers of treating providers, dates of accident, provinces, employers name, VAT numbers of employer, registration numbers of employer, all treatment-related information (e.g., admission and discharge dates from hospitals, clinical, billing and product codes, medical reports and supporting documents) and information related to submission of claims;
- Payment-related information, including invoices, statements and remittances; and
- Correspondence.

Funder and Administrator Clients, including Switches and Managed Care Organisations

- Entity names, addresses, and contact details;
- Names, surnames, titles and contact details of executives, employees and contact persons;
- All the information included in proposals and agreements;
- Invoices and payment information; and
- Correspondence.

Beneficiaries / Policy Holders of Funder and Administrator clients when rendering services on their behalf in terms of written Agreements:

- Full names and surnames, identity numbers, dates of birth, age, addresses, contact details, applicable funders and incident numbers provided by the funders;
- ICD-10 codes and relevant descriptions of diseases, injuries and medical conditions; and
- Policy holders' full names and surnames, policy numbers, addresses, contact details and incident numbers.

Suppliers, Vendors and Other Persons, Entities and Bodies

- Organisations' names, registration details, addresses and contact details;
- Names, surnames, titles and contact details of executives, employees and contact persons;
- All the information included in proposals and agreements;
- Bank details and payment-related information;
- VAT Numbers;
- Official documentation, such as newsletters and brochures;
- BBBEE certificates;
- Healthcare providers involved in the treatment of the patients and beneficiaries mentioned above: names and surnames, titles, addresses, practice numbers and VAT numbers;
- COVID-19 screening information of visitors to SpesNet Group; and
- Correspondence.

Directors and their Spouses

- Names, surnames, addresses, and contact details;
- CVs and interests of directors;
- Identity and passport numbers; and
- Information provided on visa application forms.

9. PROCESSING OF INFORMATION ON BEHALF OF CLIENTS / MEMBERS

We process personal information, in terms of written agreements, on behalf of clients and our members. This information relates to the clients' and members' data subjects such as medical scheme beneficiaries, patients and policy holders. If you are a patient, medical scheme beneficiary or policy holder, you should refer to your treating practitioner's, medical scheme's

or insurer's privacy policy or related documentation, which is independent of this Privacy Policy, for further information in respect of the personal information that they collect and process.

10. PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION

We generally process your personal information for the following purposes:

- to meet SpesNet Group's objects and perform agreements with clients;
- to procure and enrol members, administer membership, collect fees and provide membership services;
- to procure and enrol clients, manage and execute contracts, collect fees and provide client services;
- for training, up-skilling and career growth purposes;
- for industrial relations and disciplinary purposes;
- for governance purposes;
- for communication purposes;
- to engage with public and private bodies (including regulators) on behalf of clients;
- to engage with clients and potential clients, nationally and internationally;
- for marketing purposes;
- for procurement purposes;
- for historical, statistical and research purposes;
- for enforcement of SpesNet Group's rights;
- to discharge statutory duties;
- for the provision of employment benefits;
- to detect criminal behaviour;
- for protection of our offices, business, assets and employees; and
- for any other lawful purpose related to SpesNet Group's business.

11. CONSENT

If you consent to the processing of 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 provided for in the law.

12. OBJECTION TO PROCESSING

When we process personal information to protect your legitimate interests or based on the legitimate interests of SpesNet Group 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 our Information Officer. This does not affect your personal information that we have already processed. If you object and we agree with your objection, your personal information will only be processed as provided for in the law.

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.

Personal information of all data subjects may be shared with the following persons and entities, if required for the business of SpesNet Group, if it is required or authorised in terms of the law or with consent of the relevant data subject:

- Directors and relevant employees;
- SpesNet Group of companies involved in the rendering of the services to members or clients;
- Relevant funders (including relevant switching houses) and insurers depending on the services provided to clients and members;
- Employers of injury-on-duty patients;
- Relevant healthcare providers (patients, beneficiaries and policy holders);
- Our auditors;
- Our legal and professional advisers;
- Our insurers;
- Law enforcement structures, including courts and tribunals; and
- Relevant persons or entities as required or permitted by law, where we are under a duty to disclose or share information in order to comply with any legal obligation or to protect the rights, property or safety of our business, clients, employees, the public or others.

Other potential recipients of personal information, include the following:

Personal information of all data subjects may be shared with the following persons and entities, if required for the business of SpesNet Group, if it is required or authorised in terms of the law or with consent of the relevant data subject:

- Their members and staff.
- SpesNet Group Members: Their staff.
- Directors and their spouses: Embassies, travel agents, travel and accommodation providers.

14. LINKS TO SOCIAL NETWORKING SERVICES

We use social networking services such as WhatsApp, LinkedIn, Twitter and Facebook to communicate with the public about our services. When you communicate with us through these services, the relevant social networking service may collect your personal information for its own purposes. These services have their own privacy policies, which are independent of this Privacy Policy.

15. RECORD-KEEPING

We maintain records of your personal information for as long as it is necessary for lawful purposes related to the conducting of our business, the performance and enforcement of agreements, the rendering of membership services, compliance with legal obligations, dealing with complaints and litigation and for historical, statistical and research purposes subject to the provisions of the law.

16. INFORMATION SENT ACROSS THE BORDERS OF THE REPUBLIC OF SOUTH AFRICA

We send personal information of directors and their spouses (if applicable) with their consent across the borders of the Republic of South Africa for purposes of international tenders, visa applications, compliance with financial institution requirements and travel and accommodation arrangements. These countries currently include Brazil, Germany, Australia, USA, Philippines, Indonesia, Botswana, Singapore, Ireland, Dubai and Swaziland. No other personal information of data subjects is sent to any third party in another country. If it will be necessary to do so, we will obtain your prior consent unless such information may be lawfully provided to that third party.

17. SECURITY OF YOUR PERSONAL INFORMATION

We are committed to ensuring the security of your personal information in order to protect it from unauthorised processing and access as well as loss, damage or unauthorised destruction. We have implemented and continually review and update our information protection measures to ensure the security, integrity and confidentiality of your information in accordance with industry best practices. These measures include secure storage of hard copy and electronic records; access control to records; multiple levels of electronic security; workplace policies and off-site data back-ups. In addition, only those officers, employees and service providers or suppliers that require access to your information to discharge their functions and to render services to us are granted access to your information and only if they have concluded agreements with us or provided undertakings regarding the implementation of appropriate security measures, maintaining confidentiality and processing the information only for the agreed purposes. 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.

18. 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 have supplied that information subject to restrictions imposed in legislation. If you wish to exercise this right, please complete the prescribed form, available from the Information Officer, and submit it to the Information Officer. Costs may be applicable to such request, which can be obtained from the Information Officer. Please consult our PAIA Manual for further information. If you are a data subject (e.g., patient, beneficiary or policy holder) of a client, the request for access must be submitted to the relevant client (e.g., medical practice, medical scheme or insurer) in accordance with the procedures applicable at the client.

19. ACCURACY OF YOUR PERSONAL INFORMATION

It is important that we always have accurate information about you on record as it could impact on communication with you and the rendering of services to you or on your behalf. You must

therefore inform us as soon as any of your information has changed. You may also request us to correct or delete any information. Such a request must be made in writing on the prescribed form to the Information Officer. The form can be obtained from the Information Officer. You must provide sufficient detail to identify the information and the correction / deletion required. Information will only be corrected / 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 on any decision made or to be 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.

20. MARKETING OF PRODUCTS AND SERVICES

If you give or have given us consent, we may occasionally inform you, electronically or otherwise, about supplementary products and services offered by us that may be useful or beneficial to you. You may at any time withdraw your consent and opt out from receiving such information.

21. CHANGES TO THIS POLICY

We reserve the right in our sole and absolute discretion, 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. It will also be available at our offices. 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. **It is your responsibility to make sure you are satisfied with any changes before continuing to use our services.**

22. ENQUIRIES, REQUESTS AND COMPLAINTS

All enquiries, requests or complaints regarding this Policy or relating to the processing of your personal information by us should be addressed to the Information Officer. You may also lodge a complaint with the Information Regulator at complaints.IR@justice.gov.za. We would

appreciate it if you would give us the opportunity to consider your request or complaint before you approach the Information Regulator.

23. LAWS APPLICABLE TO THIS PRIVACY POLICY

This Privacy Policy is governed by the laws of the Republic of South Africa.