

INFORMATION, COMMUNICATION AND PRIVACY POLICY

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1. OBJECTIVES OF THIS POLICY

- 1.1 MediCoop respects the privacy of members and all stakeholders and will diligently ensure that it processes their personal information and special personal information appropriately, transparently, securely and in accordance with applicable laws. For the purpose of this policy, the relevant terms are defined as follows:
- 1.1.1 Personal information means any information that may be used to identify an individual, including but not limited to full names; nationality; identifying number (for example, a member number, identity number or passport number); email address; location information; physical address (for example, a residential address, work address, postal address or physical location); telephone number (including a cellular number, home landline or office work number); online identifiers such as social media profiles; biometric information (for example, fingerprints, signature or voice); age; language; date of birth; education; race and/or gender; marital status (married, single, divorced); disability; religion; culture; employment history; financial information, which may include financial and credit history and information; personal views, preferences and opinions; confidential correspondence, and specific product/ service requirements from MediCoop.
- 1.1.2 Special personal information means personal information about religious and philosophical beliefs; race (for example, when applying for a product or service where the statistical information must be recorded); ethnic origin; trade union membership; political beliefs; health (for example, when applying for an insurance policy); biometric information (for example, to verify identity); and/or criminal behaviour and alleged commission of an offence (for example, to prevent money laundering as required by law or when applying for employment or when entering into a contractual relationship with MediCoop).
- 1.1.3 Processing of information means the lawful and reasonable automated or manual activity of collecting, recording, organising, storing, updating, distributing and removing or deleting personal information to ensure that such processing is adequate, relevant and not excessive given the purpose for which it is processed.
- 1.2 MediCoop is firmly committed to complying with the Protection of Personal Information Act 4 of 2013 (POPIA). This Act requires MediCoop to inform members regarding the manner in which their personal information is used, disclosed and destroyed. It furthermore places considerable responsibility on MediCoop with regard to the manner in which it engages with its stakeholders and how personal information is processed and secured. It is essential that MediCoop has accurate and up to date information on its members and all stakeholders in order to effectively conduct business and provide products and services to its members.

2. POLICY REVIEW AND APPROVAL

- 2.1 This policy shall be subject to review and approval by the Board as deemed necessary, but not less than 12 (twelve) months after the previous review has been completed and approved by the Board at a general meeting of the Board.
- 2.1.1 Recommend to the Board any policy amendments or policy variations required to criteria related to Information, Communication and Privacy Policy;

3. GENERAL GUIDELINES

- 3.1 It is important for MediCoop to help our members retain their privacy when they take advantage of our services and products. Privacy is important to us and our members. We will protect the information our members share with us. To protect their privacy, MediCoop follows different principles in accordance with worldwide practices for customer privacy and data protection.
- 3.2 MediCoop consistently aims to ensure that personal information exchange is in line with legislative requirements. In South Africa, there are numerous legislative prescriptions that have an impact on the protection, collection, usage, storage, sharing and processing of personal health information. MediCoop is required by legislation to hold certain records. This legislation includes:*
- 3.2.1 Co-operatives Act No. 14 of 2005
 - 3.2.2 Co-operatives Amendment Act No. 6 of 2013
 - 3.2.3 Co-operative Banks Act No. 40 of 2007
 - 3.2.4 Companies Act, No. 71 of 2008
 - 3.2.5 Competition Act, No. 89 of 1998
 - 3.2.6 Consumer Protection Act, No. 68 of 2008
 - 3.2.7 Financial Intelligence Centre Act, No. 38 of 2001
 - 3.2.8 National Credit Act, No. 34 of 2005
 - 3.2.9 Promotion of Access to Information Act, No. 2 of 2000
 - 3.2.10 Protection of Personal Information Act, No. 4 of 2013
 - 3.2.11 Regulation of Interception of Communications and Provision of Communication- Related Information Act, No. 70 of 2002
 - 3.2.12 Electronic Communications and Transactions Act, No. 25 of 2002
 - 3.2.13 Financial Sector Regulation Act, No. 9 of 2017
 - 3.2.14 Prevention and Combating of Corrupt Activities Act, No. 12 of 2004
 - 3.2.15 Protected Disclosures Act, No. 26 of 2000
 - 3.2.16 Valued-Added Tax Act, No. 89 of 1991
 - 3.2.17 Basic Conditions of Employment Act, No. 75 of 1997
 - 3.2.18 Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
 - 3.2.19 Employment Equity Act, No. 55 of 1998
 - 3.2.20 Labour Relations Act, No. 66 of 1995
 - 3.2.21 Occupational Health and Safety Act, No. 85 of 1993
 - 3.2.22 Tax Administration Act, No. 28 of 2011

* Please note that this is not an all-inclusive list.

4. COLLECTING PERSONAL INFORMATION

- 4.1 MediCoop will only collect, disclose, collate, process and store ("use") personal information at our discretion when it is necessary and with written consent, to manage membership, handle member queries and requests, provide products and services - with the intention of providing an enhanced member experience. Such use will be subject to prevailing laws as may be applicable, to ensure that personal information remains protected and is used for the lawful and specific purpose for which it is required.
- 4.2 MediCoop may, during the course of its services, release sensitive or confidential information or documentation to the member and any and all such information and/or documentation will be solely for the member's benefit and information.
- 4.3 To subscribe for membership, provide personalised services and access to data, MediCoop will track, retain and collect personal information, and will share such information in a controlled manner with authorised persons.
- 4.4 Any information that MediCoop collects from individuals and/or entities during the process of applying and managing of membership, handle member queries and requests, provide products and services or through direct correspondence with the member, whether via email, telephone or by written letter, will only be used to address the matters required to finalise. If this requires referring such correspondence to a department within MediCoop or to a third-party, personal information will only be disclosed to the point necessary to address the query, request and/or concerns, and will otherwise be kept confidential.
- 4.5 Any product and service that relates to the mandate and released to the member in any form or medium will be supplied by MediCoop on the basis that it is for the member's benefit only and that it may not be copied, referenced, disclosed to or relied upon by any third party, without MediCoop's prior written consent.

MEMBER PROFILES

- 4.6 Every registered member has a unique personal profile. Each profile is assigned a unique personal identification number, which helps us to ensure that only the member can access the member profile.
- 4.7 When a member subscribes or take up a new product or service, we may ask the member to apply electronically or via a paper base process. We merge the member information with existing information on the member's personal profile. If the member hasn't previously registered with us, we create a personal profile for the member from the membership application or product/ service registration information. Should the member ever choose to review or update his/ her information, the member can visit our website, send us an e-mail or contact us.

WHAT INFORMATION DO WE COLLECT?

- 4.8 We collect personal information about our members when they use our products or services or interact with us. This is detailed in our terms and conditions when they apply for any of our products or services.
- 4.9 This includes collecting information when a member:
 - 4.9.1 Contacts us - for example, apply for a products or services, or give us feedback, or make a complaint;

- 4.9.2 Uses our products or services - for example, when they open a savings account or take out a loan; and
- 4.9.3 Visits our website or information desk - for example, leaves us a message or subscribes for our bulletins, newsletters and product information updates.
- 4.10 The information we collect from the member may include:
 - 4.10.1 Information about identity - including, but not limited to:
 - i. Identifying number (for example, a member number, identity number or passport number);
 - ii. Full names, date of birth, gender, age, language, race, marital status; disability; religion; culture;
 - iii. Addresses (for example, a residential address, work address, postal address or physical location);
 - iv. Contact information, including online identifiers such as social media profiles/ links;
 - v. Biometric information such as fingerprints;
 - vi. Other personal information;
 - 4.10.2 Professional background, training history and business/ employment information;
 - 4.10.3 Tax information and status;
 - 4.10.4 Financial and credit history and information, transactional information;
 - 4.10.5 Preferences and opinions, confidential correspondence, and specific product/ service requirements from MediCoop; and
 - 4.10.6 Location information, IP address and any third-party information.

INFORMATION WE COLLECT FROM OTHERS

- 4.11 We may collect information about our members from other institutions, including, but not limited to:
 - 4.11.1 Department of Home Affairs (DHA)
 - 4.11.2 Credit reference agencies and any other party to confirm details of a credit application;
 - 4.11.3 Service providers;
 - 4.11.4 Other financial institutions and/or banks;
 - 4.11.5 Agents, advisers, brokerages and intermediaries;
 - 4.11.6 Consultants and contractors who MediCoop work with;
 - 4.11.7 Specified professional medical bodies/ organisations/ associations;
 - 4.11.8 Educational and training institutions;
 - 4.11.9 Data management companies;
 - 4.11.10 Members and corporate clients;
 - 4.11.11 Employers of members;
 - 4.11.12 Other members and/or related parties; and
 - 4.11.13 Companies or bodies that the Member owns shares in or has an interest in.

5. USING THE INFORMATION COLLECTED

- 5.1 MediCoop uses information for several general purposes, including the following:
- 5.1.1 To subscribe for membership;
 - 5.1.2 To fulfil requests for certain products and services;
 - 5.1.3 To send customised, targeted and relevant information;
 - 5.1.4 To personalise an experience on the MediCoop digital platforms and websites;
 - 5.1.5 To provide a member or stakeholder with information related to MediCoop and its offerings;
 - 5.1.6 To better understand the needs of our members; and
 - 5.1.7 To allow users to access their own records and interact with self-service digital platforms.
- 5.2 MediCoop may also use information for direct marketing purposes or contact members for market research. Should a member wish to not have his/ her data shared with third parties, they are required to stipulate this by utilising the appropriate opt-out or unsubscribe channels in the direct marketing received and/or on the MediCoop websites.

WHAT WE DO WITH THE INFORMATION SHARED

- 5.3 On joining MediCoop, the member provides us with member contact information. We use this information to send the member updates about their profile, products and services, questionnaires to measure member satisfaction with our products and service, announcements about new products and service, and updates on products and service such as pricing information.
- 5.4 Certain product and services, as marketed on the MediCoop website and in the MediCoop marketing material and brochures are provided through the MediCoop's alliance member network. If the member selects to receive such product and service information and related news, and these products and services are provided by the alliance member or third-party provider, MediCoop will send the contact details to the alliance member or third-party provider to contact the member. We will only provide the alliance member or third-party provider the information they need to deliver the products or services, and they are prohibited from using that information for any other purpose.
- 5.5 We occasionally hire other companies to provide limited services on our behalf, including packaging, mailing and delivering purchases, answering customer questions about products or services, sending postal mail and processing event registration. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.
- 5.6 MediCoop will disclose the member's personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:
- 5.6.1 Conform to the edicts of the law or comply with legal process served on MediCoop;
 - 5.6.2 Protect and defend the rights or property of MediCoop, and
 - 5.6.3 Act in urgent circumstances to protect the personal safety of users of MediCoop, its websites, or the public.

USING DATA TO GIVE BETTER CUSTOMER SERVICE

5.7 We are always working to improve our products and services and give the member the best customer experience. New technologies let us combine member information from multiple sources, such as DHA, credit bureaus, other financial institutions and/or banks, service providers and from third-party websites/ information portals. We analyse this data to learn more about our members and industry trends, and how to improve our products and services and customer experience.

CREDIT HISTORY AND SCORE

5.8 If a member asks us for a loan or credit or choose to be a guarantor, we may check the person or entity's credit profile/ reports. We typically obtain these from credit reporting bodies, agencies or bureaus. We also share our credit information with the credit reporting bodies, agencies or bureaus in order to update their credit records.

5.9 Credit reporting bodies, agencies or bureaus include personal information in their reports to assist other credit providers to assess a person or entity's credit worthiness.

5.10 We may also ask credit reporting bodies, agencies or bureaus to give us an overall credit score of a person or entity, and we may use credit information from credit reporting bodies, agencies or bureaus together with other information to arrive at our own scoring of the person or entity's ability to manage credit.

6. PROTECTION OF PERSONAL INFORMATION

6.1 MediCoop will take all reasonable steps to ensure that personal information is protected. In order for MediCoop to comply with the conditions stipulated in the Act, several IT security policies, guidelines, directives, standard operating procedures, security measures and controls are utilised within MediCoop. These include the following:

PHYSICAL CONTROLS

6.2 Various physical controls are implemented to prevent access to IT systems and data centers. These include but are not limited to CCTV, a 24-hour security company protecting the premises and controlling access, a restricted access card control system, and a fire detection and suppression system to the IT systems and data centers.

TECHNICAL CONTROLS

6.3 A multi-layered approach ensures that security controls are placed throughout the entire internal segmented network to prevent any security breaches from advancing deeper into where the data resides. There are various security controls in place, including firewalls, an intrusion prevention system, disk encryption and a virtual private network (VPN) to protect the MediCoop data and network. The principle of least privilege applies to the identity management systems in place, ensuring that access to data and systems is limited to employees' specific functional tasks.

ADMINISTRATIVE CONTROLS

6.4 MediCoop complies with industry-specific regulatory frameworks. Various internal policies, guidelines and standard operating procedures have been implemented and are reviewed periodically to be in line with the industry landscape. MediCoop has a continuous awareness

training campaign in place to teach and regularly train management, officers, employees and representatives about data protection and security.

WEBSITE AND DIGITAL PLATFORM CONTROLS

- 6.5 The privacy of individuals who use the websites and other digital platforms of MediCoop is of the utmost importance. As such, our aim is to protect the privacy of all users and more specifically such information subject to legislative protection (“personal information”) shared with us on the MediCoop website and digital platforms.
- 6.6 MediCoop has taken strong measures to protect the security of the members’ personal information and to ensure that members’ choices for its intended use are honored. We carefully protect member data from loss, misuse, unauthorized access or disclosure, alteration or destruction.
- 6.7 When personal information is submitted to MediCoop, we will treat the data as if permission has been given – where necessary and appropriate – for the disclosures referred to in this policy. The user’s personal information is required when MediCoop is to provide products and services that the user has requested or when the user elects to provide personal information.
- 6.8 MediCoop uses industry standard SSL encryption to enhance the security of its data transmission. Similar precautions are taken in respect of mobile apps and other digital platforms, where appropriate. While striving to protect personal information, MediCoop cannot guarantee the security of the information transmitted to MediCoop and users are urged to take every precaution to protect all data transmitted to or accessed from MediCoop.
- 6.9 The MediCoop website is a commercial website and uses standard technology called a “cookie” to collect information regarding the manner in which the site is used by all users. A cookie is a small data file that allows certain websites to write to the user’s hard drive when visited. A cookie file can contain information such as a user IP that the site uses to track the pages visited, but the only personal information a cookie can contain is information supplied by the user. A cookie cannot read data off a hard disk or read cookie files created by the other sites. Some parts of MediCoop’s website and digital platforms use cookies to track user traffic patterns. This is done in order to determine the usefulness of our website and digital platform information to our users and see how effective our navigational structure is in helping users reach that information. MediCoop may log the websites visited; collect IP addresses and information about operating systems and the type of browsers used for the purposes of network/system administration; to report aggregate information to our advertisers, and to audit the use of our site. This data however will not be used to identify individual users who will at all times remain anonymous.

7. SHARING OF INFORMATION COLLECTED

- 7.1 MediCoop stores all data received within a secured environment with limited access. Personal information is stored in password-controlled servers with limited access. Member’s information may be stored and processed in South Africa or any other country where MediCoop, its subsidiaries, affiliates or agents are located.
- 7.2 MediCoop may send personal information to other people, companies or our alliance members under any of the following circumstances:

- 7.2.1 When consent has been obtained to share the information;
 - 7.2.2 When MediCoop is required to provide information to the member in respect of products offerings or services requested;
 - 7.2.3 When MediCoop is required to send the information to service providers who work on behalf of MediCoop to provide a product or service to the member;
 - 7.2.4 When the member requests to receive updates on the latest relevant announcements, news, bulletins, product updates, special offers or other information, either from MediCoop or our alliance members (unless the stakeholders have opted out of these types of communication);
 - 7.2.5 When MediCoop is required by law to disclose personal information;
 - 7.2.6 When sharing information is required to enable us to enforce our terms and conditions of use; and
 - 7.2.7 In urgent circumstances in order to protect personal safety, public safety or where the integrity of MediCoop may be compromised.
- 7.3 MediCoop will comply with the requirements of the professional rules of ethics and of confidentiality and it will reasonably maintain the confidentiality of any such information. This duty will not apply where:
- 7.3.1 The information was already in its possession prior to the engagement;
 - 7.3.2 Confidential information was already in the public domain (other than as a result of MediCoop's fault) through publication by a party other than MediCoop;
 - 7.3.3 MediCoop may be required to disclose it to its insurers and legal advisers in confidence for a legitimate business reason; and
 - 7.3.4 MediCoop is under legal obligation to do so.

8. MINORS AND PRIVACY

- 8.1 MediCoop will not enter into a membership subscription or provide a product/ service with a minor unless such minor has explicit written consent from a parent or guardian to do so. We do not intentionally collect or use personal information of children (persons under the age of 18 years) unless with express consent of a parent or guardian or if the law otherwise allows or requires us to process such personal information.
- 8.2 MediCoop undertakes not to contact minors about promotional offers or for marketing purposes without parental or guardian consent.

9. WEBSITE ACCESS, NOTICE AND CONSENT

WEBSITE ACCESS

- 9.1 MediCoop will provide the member with the means to ensure that their personal information is correct and current. The member may review and update their personal information at any time via the website and digital platforms, or alternatively via e-mail or telephone.

WEBSITE NOTICE

- 9.2 MediCoop will ask the member when we need personal information that confirms their identity or allows us to contact them. Generally, this information is requested when a member applies online, requesting specific products and services on our website or when they download software or applications, enter a contest, order e-mail newsletters or subscribe for internet or mobile banking. We use the member's personal information for four primary purposes:
- 9.2.1 To make the website user-friendly by not having to enter information more than once;
 - 9.2.2 To help the member quickly find services, information, software or applications;
 - 9.2.3 To help us create content most relevant to the member;
 - 9.2.4 To alert members on product changes or upgrades, special offers, updated information and other new services offered by MediCoop.

WEBSITE CONSENT

- 9.3 If the member opts not to register or provide personal information, they can still use most of www.medi.coop but the member will not be able to access areas that require registration.
- 9.4 Should the member decide to register, the member will be able to select the kinds of information they want to receive from us by subscribing to various services, like our electronic bulletins, newsletters and product information updates. If the member does not want us to communicate to them about general offers regarding MediCoop products, events or services by e-mail, blog, SMS or telephone, the member may select the option stating that they do not wish to receive messages and material from MediCoop.
- 9.5 MediCoop occasionally allows other companies to offer our registered customers information about their products and services, using e-mail, blog or SMS. If the member does not want to receive these offers, they may select the option not to receive messages and material from third parties.

10. E-MAIL USE AND POLICY

- 10.1 All management, officers, employees and representatives who use MediCoop's e-mail system are required to comply with this policy statement.

OWNERSHIP

- 10.2 All information and messages that are created, sent, received or stored on MediCoop's e-mail system is the sole property of MediCoop.

E-MAIL REVIEW

- 10.3 All e-mail is subject to the right of MediCoop to monitor, access, read, disclose and use such e-mail without prior notice to the originators and recipients of such e-mail. E-mail may be monitored and read by authorized personnel for any violations of law, breaches of company policies, communications harmful to MediCoop, or for any other reason.

NO PRESUMPTION OF PRIVACY

10.4 E-mail communications should not be assumed to be private and security cannot be guaranteed. Highly confidential or sensitive information should not be sent via e-mail.

CERTAIN PROHIBITED ACTIVITIES

10.5 Employees may not, without the senior management's express written authorization, transmit trade secrets or other confidential, private or proprietary information or materials through e-mail.

VIRUSES

10.6 Any files downloaded from e-mail received from non-company sources must be scanned by our virus detection software. Any viruses, tampering or system problems should be immediately reported to senior management or the person responsible for systems and IT.

11. ANTI-SPAM POLICY

11.1 This sets forth our policy with regard to the use of "Spam" marketing techniques in connection with online marketing. In the event that we deem the member to be in violation of this policy, we may immediately terminate the member's membership rights and close any active account.

11.2 We have a strict policy against spamming. We forbid the sending of unsolicited e-mails.

11.3 We consider spamming to be any activity whereby the member directly or indirectly transmits e-mail messages to any e-mail address that has not solicited such e-mail and does not consent to such transmission. We also consider spamming to constitute posting advertisements in newsgroups in violation of the terms of participation in such newsgroup, that are off topic, or in newsgroups that do not specifically permit advertisements. We also consider it spamming when advertisements are placed on message Boards or in chat rooms when they are not permitted by the terms of participation in such message Boards and chat rooms.

11.4 We reserve the right to terminate a member's account if we deem the member to be in violation of our anti-spam policy. We also reserve the right to suspend any person or entity's membership and participation pending review upon receipt of any complaint or other evidence that the member may be engaging in any spamming activity.

11.5 If a member is "spammed" by anyone regarding our products, services, website, or any other matters, please report this activity to info@medi.coop. Ensure the words Spam are in the Subject line.

12. KEEPING INFORMATION AND MEMBER RECORDS SAFE AND SECURE

Our staff are trained in how to keep Members' information and records safe and secure.

Staff training	We train our staff in how to keep Members' information safe and secure.
Secure handling and storage	When we send information overseas or use third parties that handle or store data, we make arrangements to protect Members' information.
System security	<p>When Members log into our websites or digital platforms, we encrypt data sent from their computer to our systems so no one else can access it.</p> <p>We have firewalls, intrusion detection and virus scanning tools to stop viruses and unauthorised people accessing our systems.</p> <p>When we send electronic data to other organisations, we use secure networks or encryption. We use passwords to stop unauthorised people gaining access to Members' data.</p>
Destroying or de-identifying data	We aim to keep personal information only for as long as we need it – for example, for business or legal reasons. When we no longer need information, we take reasonable steps to destroy or de-identify it.

SECURITY BREACH

- 12.1 It is important to note that MediCoop may access information without the necessary authority in the event that systems are compromised as a result of viruses, hacking incursions and other illicit means of obtaining such data, where the user's IT infrastructure or device has been compromised in any way or where the user provides sensitive login information or passwords to third parties, or where the unauthorised interception has occurred due to the fault or negligence of the user which may be beyond the control of the Scheme.
- 12.2 Where such information is accessed or disclosed through such unauthorised means, MediCoop shall not be held liable for any such unauthorised disclosure of any such information, including the personal information, except where there is intentional disclosure of the personal information or in circumstances where the Scheme is grossly negligent.

13. LODGING A COMPLAINT

- 13.1 If you have reason to believe MediCoop has not adhered to these principles, please notify us by e-mail at complaint@medi.coop, with the words "Privacy Policy" in the subject line, and we will do our best to determine and correct the problem promptly.
- 13.2 Should there be any concern regarding a breach of information or the inappropriate use of information, please notify us by e-mail at info@medi.coop, with the words "Information Breach" in the subject line, and we will do our best to determine and correct the problem promptly.