

PRIVACY POLICY

This is the Privacy Policy of Unistel Medical Laboratories (Pty) Limited. As a medical services company we take privacy seriously and are committed to protecting the privacy and security of our customers, service providers and employees. This privacy notice outlines how your personal information is treated through the use of this website, our services, when you apply for a vacancy and when you communicate with us.

This Privacy Policy should be read together with our Website Terms and Conditions of Use and our General Terms and Conditions.

When you visit our website, directly or indirectly purchase or request services from us, supply services to us or apply for a job with us you agree to your personal and special personal information being processed by us in terms of this Privacy Policy.

1. **Governance**

Unistel Medical Laboratories (Pty) Limited is a private company incorporated in South Africa with a Board of Directors which consists of non-executive and executive directors who are responsible for governance and oversight.

2. **Our Privacy Principles**

- We will only collect, transfer, process and store your personal and special personal information as defined in the Protection of Personal Information Act 2013 with your consent and for the purposes it is required unless we are required for legal reasons to disclose same or in terms of applicable legislation (for e.g. the National Health Act and the National Institute of Communicable Diseases).
- We will process and retain your personal and special personal information as required in terms of applicable legislation and will destroy same upon the expiry of the applicable terms;
- We may from time to time anonymize data which we will use purely for statistical and research purposes.
- We aim to ensure your information is accurate and up to date.
- We will take appropriate steps to protect the security of information you have provided to us in terms of industry standards.

3. **What information do we collect?**

- We collect your Personal Information and Special Personal Information as defined in the Protection of Personal Information Act.
- What is Personal Information and Special Personal Information?

- Personal Information refers to information relating to an identifiable living natural person and to some extent juristic persons and can be for example information relating to a name, identity number or email address.
- Special Personal Information refers to information which amongst others includes information regarding your health which will include the laboratory tests we perform on your behalf with your informed consent.
- We can also collect information on your browsing and device history as per our website in terms of our Website terms and conditions of use.
- We conduct animal testing services on behalf of customers and these results are considered confidential information and proprietary to the customer.

4. **Why do we collect information on you?**

- We will process and retain your laboratory test requests and results for certain periods of time to allow your healthcare provider(s) to direct your clinical care.
- We do not use your Special Personal Information for anything other than your direct clinical care unless we are required to disclose a specific diagnosis to the National Institute of Communicable Diseases ("NICD") as regulated in terms of the National Health Act and to institutions and persons as directed by the NICD.
- We will from time to time completely anonymize data which we will use for research and statistical purposes. Where we share anonymized data we make sure that there is no way to ever identify you. Anonymized or aggregated statistical information may also be passed to organizations with a legitimate interest e.g. Universities, research institutions and the National Department of Health.
- We may keep your information in written format and / or digital format and your record will include basic details about you such as your name, address and may contain more sensitive information about your health.

5. **Your information is safe and confidential with us**

- It is every patient's and customer's right to expect that information held and used about them is safe and secure and only used for the agreed purpose.
- All our staff sign strict confidentiality agreements when they are employed by us and are further subject to the confidentiality requirements of their professional associations like for example the Health Professions Council of South Africa and the South African Nursing Council.
- Our staff will do their utmost to protect your confidential information.
- Where we outsource certain functions and therefore the processing of your Personal Information and Special Personal Information to third parties or provide your Personal Information and Special Personal Information to third-party service providers, we oblige those third parties to protect your Personal Information and Special Personal Information with appropriate security measures in accordance with our standards and applicable law.
- We do not use your personal information for marketing or advertising purposes.

6. **Processing of Personal and Special Personal Information**

- Unistel processes Personal Information and Special Personal Information in the following ways:
- For internal purposes we use electronic and manual mechanisms to process Personal Information and Special Personal Information of employees and visitors to our laboratories or depots.
- For the purposes of direct patient care we will ensure that the information collected about you has been provided by you or your healthcare provider with your informed consent and where we collect any additional information we shall do so with your informed consent for that purpose or activity provided it is not an emergency care situation and you are unable to consent.
- We ensure that information collected about your child has been provided by you or your healthcare provider with your informed consent, applying the same strict measures as to your own information.
- For indirect care and to maintain internal rules for the use of information through secure services and systems as well as for the purposes of investigating complaints, legal claims or adverse incidents.
- For the purposes of seeking payment from your medical scheme where you have indicated to us that you belong to such scheme and that you wish to seek re-imbusement of our costs from the medical scheme.
- We collect Personal Information of healthcare providers to communicate laboratory information, operational matters and test results of patients to them;
- We collect confidential information relating to animal testing services we provide to our customers.

7. **Your rights as our Patient and Customer**

- You have the right to request access to your information that we hold and you and you may request that we correct any of your Personal Information we have on file if it is inaccurate or incomplete by contacting us at tdel@unistelmedical.com;
- We may unfortunately not delete any of your Special Personal Information for certain periods of time as this forms part of your clinical record and may be needed in future for clinical care or for medico legal purposes.

8. **How long do we retain your personal and special personal information?**

- We will only retain your Personal Information and your Special Personal Information for as long as necessary to fulfil the purposes we collected it for, or as permitted by law.
- To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the Personal Information and your Special Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information and your Special Personal Information, clinical guidelines, medico legal considerations and the purposes for which we process your Personal Information and your Special Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. **How do we secure your Personal Information?**

9.1 Your personal information shall be treated as confidential and collected, processed and stored by Unistel and our service providers in a manner that ensures appropriate security thereof, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures, which include:

- business continuity planning;
- disaster recovery planning;
- security awareness;
- application of international information security standards;
- benchmarked information security measures and
- information governance.

9.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. **Updating of this Privacy Policy**

We reserve the right to update this Privacy Policy at any time and will place the latest version thereof on our website.

11. **Complaints, Compliments and Comments**

If you have any questions, compliments, suggestions or a complaint please contact us on tdel@unistelmedical.com.