

PRIVACY POLICY

IMAGEMED cc

In terms of POPIA 4 of 2013

July 2021

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1. DEFINITION OF TERMS

- 1.1 Personal Information - Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.
- 1.2 Data Subject - The person to whom personal information relates.

2. ACRONYMS / ABBREVIATIONS

PAIA - Promotion of Access to Information Act 2 of 2000
POPIA - Protection of Personal Information Act 4 of 2013

3. INTRODUCTION TO THE DATA PROTECTION POLICY

3.1. BACKGROUND

ImageMed cc (hereinafter referred to as "the Company") is a close corporation registered in terms of the Close Corporations Act 69 of 1984.

The Company is obligated to comply with the Protection of Personal Information Act 4 of 2013 (POPIA). POPIA requires that the Company informs its data subjects as to how their personal information is used, disclosed and destroyed.

The Company guarantees its commitment to protecting its data subject's privacy and ensuring that their personal information is used appropriately, transparently, securely and under applicable laws.

3.2. PURPOSE OF THE DATA PROTECTION POLICY

The Policy sets out how the Company deals with its data subject's personal information and stipulates the purpose for which such personal information is used. The Policy is made available on the Company's website (www.imagemed.co.za). It is also available by request from the offices of the Company.

3.3. POLICY REVIEW

The Policy will be reviewed annually by the Members. In addition, interim changes may be made from time to time where appropriate.

4. PROTECTION OF PERSONAL INFORMATION IN TERMS OF POPIA

4.1. PERSONAL INFORMATION COLLECTED

Section 9 of POPIA states that "Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive."

The Company collects and processes personal information received from its data subjects. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, the Company, through its Information Officer, will inform the data subject as to the information required and the information deemed optional.

Website usage information may be collected using "cookies" which allow the Company to collect standard internet visitor usage information.

4.2. THE USAGE OF PERSONAL INFORMATION

Personal Information will only be used for the purpose for which it was collected and as agreed. This may include:

- Providing services to data subjects and carrying out the transactions requested;
- Sharing with other third parties, if necessary;
- Confirming, verifying and updating data subject's details;
- For audit and record-keeping purposes;
- In connection with legal proceedings;
- Providing communication in respect of the Company and regulatory matters that may affect data subjects; and
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of POPIA, personal information may only be processed if certain conditions, listed below, are met along with supporting information for the processing of personal information:

- The data subject consents to the processing: - consent is obtained from data subjects during the introductory, appointment and application stage of the relationship;
- Processing complies with an obligation imposed by legislation; and
- Processing protects the legitimate interest of the data subject.

4.3. DISCLOSURE OF PERSONAL INFORMATION

The Company may disclose a data subject's personal information to any of its third party service providers, including accountants and consultants who have agreements in place to ensure compliance with confidentiality and privacy conditions.

The Company may also share personal information with, and obtain information about data subjects from third parties for the reasons already discussed above.

The Company may also disclose a data subject's information where it has a duty or a right to disclose in terms of the applicable legislation, or where it may be deemed necessary to protect its rights.

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4.4. SAFEGUARDING DATA SUBJECT'S PERSONAL INFORMATION

POPIA requires that the Company adequately protects personal information. The Company continuously reviews its security controls and processes to ensure that personal information is secure and that its operators comply with POPIA.

The following procedures are in place to protect personal information:

- (i) The Company's Information Officer is LUCINDA DUDLEY whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPIA;
- (ii) This Policy has been put in place throughout the Company and its operators and training on this Policy and the POPI Act has already taken place;
- (iii) Employees are required to sign an employment contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPIA;
- (iv) All electronic files or data are backed up by the Company's operators, who are also responsible for system security that protects third party access and physical threats; and
- (v) The policies and procedures of the Company's operators cover the following:
 - Physical security;
 - Computer and network security;
 - Access to personal information;
 - Secure communications;
 - Security in contracting out activities or functions;
 - Retention and disposal of information;
 - Acceptable usage of personal information;
 - Governance and regulatory issues;
 - Monitoring access and usage of private information; and
 - Investigating and reacting to security incidents.

Consent to process data subject information is obtained from data subjects (or a person who has been given authorisation from the data subject to provide the data subject's personal information) during the introductory, appointment and application stage of the relationship.

4.5. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- (i) Data subjects have the right to access the personal information the Company holds about them;
- (ii) Data subjects also have the right to ask the Company and its operators to update, correct or delete their personal information on reasonable grounds;
- (iii) Once a data subject objects to the processing of their personal information, the Company or its operators may no longer process said personal information; and
- (iv) The Company and its operators will take all reasonable steps to confirm the data subject's identity before providing details of their personal information or making changes to their personal information.

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The details of the Company's Information Officer are shown below.

5. RETENTION & CONFIDENTIALITY OF DOCUMENTS, INFORMATION AND ELECTRONIC TRANSACTIONS

5.1. ACCESS TO DOCUMENTS

(i) All personal information is dealt with in the strictest confidence and may only be disclosed, without fear of redress, in the following circumstances:

- where disclosure is required by law;
- where there is a duty to the public to disclose; and
- where the interests of the Company or its operators require disclosure.

(ii) Disclosure to third parties

All employees have a duty of confidentiality concerning the Company and its data subjects. In addition to the provisions of clauses above, the following are also applicable:

- Information on data subjects: Our data subject's right to confidentiality is protected in the Constitution and in terms of legislation. Information may be given to a third party if the data subject has consented in writing to that person receiving the information;
- Requests for the Company's information: These are dealt with in terms of the Promotion of Access to Information Act, which gives effect to the constitutional right of access to information held by the State or any person (natural and juristic) that is required for the exercise or protection of rights. The Company may, however, refuse access to records if disclosure would constitute an action in breach of the duty of secrecy to a third party.

In terms hereof, requests must be made in writing on the prescribed form to the Information Officer in terms of PAIA. The requesting party has to state the reason for wanting the information and has to pay a prescribed fee.

The Company's manual in terms of PAIA, which contains the prescribed forms and details of prescribed fees, is available on the website www.Tugmed.co.za

6. DESTRUCTION OF DOCUMENTS

Documents will be destroyed after the termination of their specified retention periods;

7. NON-COMPLIANCE WITH THE POLICY

Employees who contravene this Policy will be subject to disciplinary action which may lead to their dismissal.

8. AVAILABILITY OF THE PAIA MANUAL

The PAIA manual is made available in terms of Regulation Number R. 187 of 15 February 2002. The manual is available at www.imagemed.co.za.

9. INFORMATION OFFICER DETAILS

Name: LUCINDA DUDLEY

Telephone Number: _____

E-mail Address: Sales@imagemed.co.za



MEMBER

3 August 2021

DATE