



"Pathology that Adds Value"

PRIVACY POLICY OF DRS DIETRICH, VOIGT, MIA & PARTNERS ("PATHCARE")

1. INTRODUCTION

We are Drs. Dietrich, Voigt, Mia & Partners ("PathCare") a laboratory medicine practice based in South Africa and place our patients at the heart of what we do.

PathCare Group includes the wholly owned practice known as Dr WJH Vermaak Inc. which practices laboratory medicine predominantly in Gauteng.

2. FREEDOM OF INFORMATION

PathCare is a private body as defined in the Promotion of Access to Information Act (2 of 2000) and will only release information where required to do so by law, with your informed consent or in a truly anonymised format for research and statistical purposes.

3. OVERSIGHT AND GOVERNANCE

The PathCare Group has a Board of Governors that is responsible for oversight and governance. The Board of Governors is elected from partners in the practice as well as non-executive members with specialist skills including but not limited to law, human resources, accounting and information technology.

4. PERSONAL INFORMATION AND SPECIAL PERSONAL INFORMATION

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 and on instruction of your healthcare provider.

5. WHY DO WE COLLECT INFORMATION ABOUT YOU?

5.1 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.

5.2 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.

5.3 We will from time to time completely anonymise 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. Anonymised or aggregated statistical information may also be passed to organisations with a legitimate interest e.g. Universities, research institutions and the National Department of Health.

5.4 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.

6. YOUR INFORMATION IS CONFIDENTIAL AND SAFE WITH US

6.1 It is every patient's right to expect that information held and used about them is safe and secure and only used for the agreed purpose.



- 6.2 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.
- 6.3 Our staff will do their utmost to protect your confidential information.
- 6.4 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.
- 6.5 We do not use your personal information for marketing or advertising purposes.

7. PROCESSING OF PERSONAL INFORMATION AND SPECIAL PERSONAL INFORMATION

- 7.1 The PathCare Group processes Personal Information and Special Personal Information in the following ways:
 - 7.1.1 For internal purposes we use electronic and manual mechanisms to process Personal Information and Special Personal Information of employees and visitors to any of our laboratories or depots.
 - 7.1.2 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.
 - 7.1.3 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.
 - 7.1.4 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.
 - 7.1.5 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-imbursment of our costs from the medical scheme.
 - 7.1.6 We collect Personal Information of healthcare providers to communicate laboratory information, operational matters and test results of patients to them.

8. YOUR RIGHTS AS OUR PATIENT

- 8.1 You have the right to request access to your medical records and you can do so in a number of ways:
 - 8.1.1 Through our helpdesk if you have registered your email address with us and verified your identity at helpdesk@pathcare.co.za;
 - 8.1.2 Through your healthcare provider;
 - 8.1.3 By visiting any of our depots and verifying your identity.
- 8.2 You may request that we correct any of your Personal Information we have on file if it is inaccurate or incomplete by visiting one of our depots or contacting us at helpdesk@pathcare.co.za.
- 8.3 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.

9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION AND YOUR SPECIAL PERSONAL INFORMATION?

- 9.1 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.
- 9.2 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 unauthorised 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.

10. HOW DO WE SECURE YOUR PERSONAL INFORMATION?

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

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

10.2 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.

11. COOKIE POLICY

We collect data about how you interact with our website and mobile application through the use of cookies and similar technology.