

# PRIVACY NOTICE

When we refer to 'we', 'us' and 'our', we mean Life Healthcare Group Holdings Limited and its subsidiary companies.

**We are committed to protecting and respecting your privacy when dealing with your personal information.**

## PLEASE TAKE NOTE OF THE FOLLOWING PERTINENT POINTS REGARDING OUR PRIVACY POLICY:

**This Privacy Notice sets out the basis on which any personal information we collect from you, or that you provide to us, is used, stored, disclosed and processed by us.**

*Please read the following carefully to understand our practices regarding your personal information, how we will treat it and your rights in relation to that information. By providing your personal information to us or by using our services, website or other online or digital platform(s) you acknowledge that the practices as described or referred to in this Privacy Notice may apply to you.*

### Your personal information

When we refer to personal information in this notice, we mean information relating to an identifiable, living, natural or juristic person, as defined in the Protection of Personal Information Act, 2013 ("POPIA"). We may hold and use personal Information about you as a customer, supplier, employee, student, a patient or in any other capacity, in accordance with the applicable laws.

Depending on what services you receive from us, we may process special personal information, as defined in POPIA, such as information relating to your health.

### When do we collect personal information about you?

We may collect your information when you:

- are admitted as an in- or outpatient or register as customer with us or book to receive any of our diagnostic or complementary health services;
- are referred by a doctor or any other organisation for services;
- visit one of our websites;
- apply for a job with us and as part of the recruitment process;
- enquire about any of our services;
- use or request to use any of our online services;
- fill in a form or survey for us;
- carry out a transaction on our website;
- participate in a competition or promotion or marketing activity;
- make payments to us;
- contact us, for example by email, telephone or social media;
- participate in interactive features on any of our websites; and
- interact with any of our third-party service providers. In addition to collecting personal information directly from you, we may also gather information from other sources such as your employer, medical professionals and institutions, government bodies, medical schemes and insurers and other professional advisory service providers. This information may be obtained both before and during the provision of services to you.

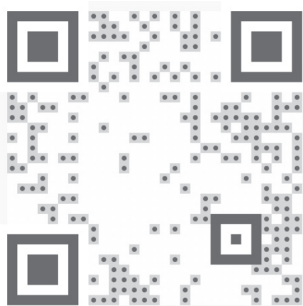
***Please note, in the interests of training and continually improving our services, calls to Life Healthcare or any of its subsidiaries may be monitored or recorded.***

### What personal information do we collect

The information we collect may include inter alia the following:

- nationality, marital status, demographic details, identification and passport numbers and documents and biometric information
- health information, including photos, scans; x rays and other information such as information about your health status, pregnancy; medical records and medical assessment outcomes, diagnosis and surgical procedure and behavior details
- medical scheme details, insurance and other benefits information
- historic and current physical and mental healthcare records
- special personal information that may relate to your past, current or prospective medical treatment
- market intelligence information that may relate to your well-being
- employment details, and occupational health details
- children and next of kin or legal guardian details
- financial information, such as payment card details, credit bureau information and bank account and tax details
- juristic person details for example entity details; directors; names of contact persons; contracts; registration numbers; statutory information and confidential correspondence and presentations and tenders
- your marketing preferences and consents
- recordings of telephonic discussions where applicable, such as debt collection communications
- names and details of next of kin and other emergency contacts
- information required to comply with laws or the requests and directions of law enforcement authorities, such as communicable disease reporting or occupational injury or disease reporting
- website end user information for example names; electronic identifiers; IP address; logs; cookies; GPS or location data; cell phone
- CCTV footage
- audio recordings

***Please visit [www.lifehealthcare.co.za](http://www.lifehealthcare.co.za) for the full privacy policy or scan this QR code:***



# PRIVACY NOTICE

## Lawful basis to process your information

In accordance with POPIA, we must establish a lawful basis for processing your personal information. We process personal information on one or more of the following grounds:

- you consent to the processing of your information;
- processing of the information is necessary for the performance of a contract (where you are a party to the contract);
- a legal obligation or existing regulation is imposed upon Life Healthcare;
- processing is necessary for the protection of our and your legitimate interests; or
- where you have deliberately made personal information (including special personal information) relating to your health, race and ethnic origin or information concerning any criminal convictions or alleged offences public, we can process such personal information, specifically to service your healthcare needs.

In addition, your special personal information, such as information relating to your health may be processed if such processing is necessary for your proper treatment and care, for the administration of our professional practice or other related integrated healthcare services or where such processing is necessary for the work conducted by insurance companies, medical schemes, medical scheme administrators and managed healthcare organisations.

The National Health Act, 2003 also permits us to disclose your personal information in the following circumstances:

- you consent to this disclosure in writing;
- a court order or any law requires that disclosure; or
- non-disclosure of the information represents a serious threat to public health.

## Disclosure of your personal information

We may disclose your personal information (to the extent necessary) to certain third-party organisations used to support the delivery of our services during our usual course of business.

The hospital, clinic, facility, its staff and healthcare providers, including but not limited, to doctors, pathologists, radiologists and therapists (and other allied healthcare professionals or auxiliary medical professionals), may collect, process and disclose your confidential information, including information relating to diagnosis and treatment (referred to herein as “personal and health information” or “information”), as may be necessary in the following circumstances:

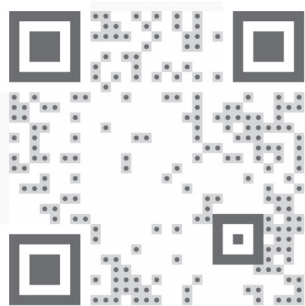
- To enable the hospital or clinical staff to perform their duties.
- For the hospital, clinic, facility, its staff and healthcare providers involved in your treatment to provide services to you for the purposes of your treatment and care. This will apply to services rendered to you during your current admission and any future admissions to any Life Healthcare hospital. This also includes services rendered by our pharmacy staff for the purposes of providing you with suitable pharmaceutical treatment and medicines in relation to your diagnosis and medical condition.
- To facilitate the due and proper administration of the operations of Life Healthcare in order to ensure that you, as our patient, receive quality healthcare.
- To obtain authorisation for treatments and/or payment of your account from a medical scheme or insurer, integrated medical service provider, other institution, person or company.

In instances where we share your personal and health information with third parties, we undertake to share only information which is necessary, or which is necessary to prevent a threat to public health, while preserving the confidentiality, privacy and security of that information as far as possible. In addition, Life Healthcare may be required to disclose your personal and health information in compliance with a court order or other legal obligation. Upon your request, we will inform you of the recipients or category of recipients with whom we share your personal information, as well as the category of information shared (for example, your demographic or health information);

In addition to the above instances, Life Healthcare may process your personal and health information for the following purposes:

- To share your information with our clinical engineering staff, third-party clinical equipment suppliers and maintenance technicians to the extent that your information is stored or recorded on any of the clinical equipment used for the purposes of providing you with proper treatment and care. In these instances, we undertake to ensure the confidentiality, privacy and security of your information as far as reasonably possible and in compliance with POPIA.
- To share your information with third-parties such as attorneys and other professionals acting on your behalf who may, on your instruction or with your knowledge and authorisation, seek access to your personal and health information for your benefit either for litigious or non-litigious reasons, or to share your information with our own attorneys and/ or other professionals for instituting or defending any potential legal and/or medico-legal claims and/or evaluating any treatment.
- To share your information with our relevant internal investigation teams in the event that an incident related to your treatment occurs, as part of the hospital's quality, internal complaints and incident investigation process.
- To share your information with non-clinical third-parties such as our auditors, advisors for the purposes of running and administering our day-to-day operations and subject to them being bound by confidentiality undertakings, in respect of any outstanding hospital account, to share your information with third-parties assisting us in recovering payment of the account from you (such as debt recovery agents or attorneys).
- To administer and manage funder claims.
- Where relevant to your condition, to use your contact information to send you multi-channel communications to monitor the quality of your treatment experience for the purposes of understanding and improving your clinical or health outcomes and to measure patient satisfaction. These communications may include treatment information, educational content or summaries to assist you with managing your health, or clinical surveys, where you have a choice to participate or opt out.
- To share your personal information (limited only to your name and contact details) with our third-party service providers for the purposes of conducting our post-discharge survey to ensure the ongoing quality of our services. Should you choose not to participate in the post-discharge survey, you may select to opt out of participating and we will cease processing your information for these purposes.

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- To share your information with business partners, suppliers and sub-contractors for the performance of services we provide to you as set out in the Privacy Notice.
- To share your information with organisations providing IT systems support and software development and for hosting in relation to the IT systems on which your information is stored and subject to confidentiality undertakings.
- To share your information with transport and delivery companies for the purposes of transportation.
- To share your information with third-party service providers for the purposes of storage of information and confidential destruction of records.
- To share your information with third-party marketing companies for the purpose of sending marketing emails, subject to obtaining appropriate consent.
- We may utilise personal information, including biometric information, to authenticate your identity and verify the details you have supplied with third-party verification providers for security and fraud prevention.
- Where a third-party supplier is used, we shall endeavour to ensure that they operate under contractual restrictions with regard to confidentiality and security, in addition to their obligations under POPIA.
- In the case of independent consultants, the consultant is the responsible party in respect of your personal information and will be required to maintain their own records in accordance with POPIA, applicable clinical confidential guidelines and retention periods.
- Regulators: We may be requested – and in some cases can be legally required - to share certain information (including personal information and special personal information) about you and your care with regulators such as the Department of Health, the Health Professions Council of South Africa, Mental Health Review Boards (where applicable) or the National Institute for Communicable Diseases of South Africa. We will ensure that we do so within the framework of the law and with due respect to your privacy.
- In an emergency and if you are incapacitated, we may also process your personal information (including special personal information) or make personal information available to third-parties on the basis of protecting your ‘vital interest’ (i.e. your life or your health).
- We participate in national audits and initiatives to help ensure that patients are getting the best possible outcomes from their treatment and care. Confidentiality will be applied to your personal information in accordance with POPIA. Anonymous, pseudonymous or aggregated information may be used by us or disclosed to others.

## IP Address

All information regarding your IP address will automatically be collected and stored as part of your access via the website to Life's Healthcare's server. This website usage information serves as an indicator of how visitors make use of the website, the amount of times the website is accessed, the frequency of all users in general to each web page, registered IP addresses together with the time period of each visit and/or access of the website and web pages.

Should there be an information security incident, the IP address will be used to identify the user by the internet service provider and contact may be made thereafter. Life Healthcare will endeavour to process your IP address in accordance with this notice and any applicable laws.

## Sale of business

We may also disclose your personal information to third-parties in the event that we sell or buy any business or assets or where we are required by law to do so.

## CCTV

Many of our premises are surveyed by CCTV for the purposes of security and the safe provision of care. Images and videos may be retained securely for a limited period and include your personal information. Machine monitoring and/or Artificial Intelligence may be implemented to ensure improved security and safety of our premises.

## Suppliers and vendors

We may process personal information relating to any third-party suppliers or vendors as required for our legitimate business interests and in the course of running our business. These include but are not limited to:

- during our BEE scoring and reporting process;
- computing sustainability measures;
- during quality audits;
- during internal and external investigations;
- if you submit tender and other proposals to us, and for vendor assessments that may be carried out as required.

We may also process your information during a business due diligence; and we may process your information for commercial and market research purposes.

## Transfers of personal information outside of South Africa

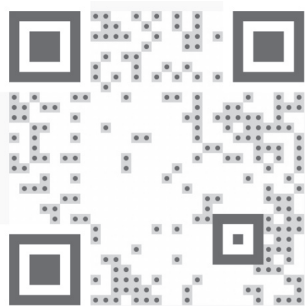
Personal information that we collect from you may be transferred to, and stored at, a destination outside of South Africa. It may also be processed by staff operating outside South Africa who work for us or one of our service providers. Where we transfer your personal information outside South Africa, we will endeavour to ensure that there are adequate protections implemented and an applicable ground for transfer in accordance with the requirements of section 72 of POPIA.

## Organisational and technical security measures

Your personal information will be kept confidential and secure in accordance with our Privacy Notice and any applicable laws.

We have appropriate organisational and technical security measures in place to prevent unauthorised access, unlawful processing of personal information, loss, destruction or damage of personal information. We monitor our information systems in an endeavour to ensure that the ongoing security is robust.

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# PRIVACY NOTICE

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website and information systems, you are responsible for keeping that password confidential. We ask you not to share your password with anyone. The transmission of information via the internet cannot be guaranteed as completely secure. Once we have received your information, we will use strict procedures and security features in an endeavor to prevent unauthorised access.

At your own or your doctor's request, we may transfer personal information, including health information to you or your doctor via email or instant messaging, specifically including, but not limited to WhatsApp, or you may choose to transfer information to us via email or instant messaging. While this may be done for the purposes of providing you with appropriate treatment and care, these may not be the most secure methods of information transmission. If you or your doctor choose to send or receive such information via these methods, you acknowledge and understand that the use, processing and sharing of your personal information in this manner will be done at your own risk.

Some of the risks which should be noted regarding the sharing of personal information through instant messaging platforms:

- Instant messaging platforms are not monitored by the Life Healthcare information security office, as they are often sent and received on personally owned devices. We have limited or no control over the security of instant messaging platforms or the instant messages and information which is shared over these platforms.
- Accountability for information sent from/to personal devices through instant messaging platforms becomes the responsibility of the recipient and sender in their own capacity as the platform is not owned, managed or monitored by us.
- The storage and back up of data on instant messaging platforms may occur in countries outside of South Africa until it is permanently deleted, resulting in personal information being processed outside of the borders of South Africa.

## Your rights

You have the following rights in relation to your personal information, where legally permissible:

- Right of access: the right to make a written request for details of your personal information and a copy of that personal information.
- Right to rectification: the right to have inaccurate information about you corrected or removed.
- Right to erasure ('right to be forgotten'): the right to have certain personal information about you erased.
- Right to restriction of processing: the right to request that your personal information is only used for restricted purposes.
- Right to object: the right to object to the processing of your personal information in cases where our processing is based on the performance of a task carried out in the public interest or we have let you know the processing is necessary for our or a third-party's legitimate interests.
- Right to withdraw consent: the right to withdraw any consent you have previously given us to handle your personal information. If you withdraw your consent, this will not affect the lawfulness of our use of your personal information prior to the withdrawal of your consent and we will let you know if we will no longer be able to provide you your chosen product or service.
- Right in relation to automated decisions: you have the right not to be subject to a decision based solely on automated processing in accordance with section 71 of POPIA.

***Please note: These rights are not absolute. They do not always apply in all cases, and we will let you know in our correspondence with you how and whether we will be able to comply with your request.***

Should you, at any time, wish to object, or feel that we are not reasonably processing your personal and health information in a manner that preserves the confidentiality, privacy and security thereof as required by law, you may notify us accordingly, either telephonically or in writing, and we will then ensure that your complaint or query is investigated and dealt with efficiently.

Further to the above, you may contact us to determine whether we hold any of your personal information and thereafter, to request that we rectify or delete such information (to the extent that we are not prohibited from doing so by any law), should it be found to be inaccurate or outdated. In this regard, you may access our PAIA Manual on our website, which outlines the manner and procedure in which you may request information from us.

Should you wish to exercise any of the above rights, you may contact the Group Information Officer at [myprivacy@lifehealthcare.co.za](mailto:myprivacy@lifehealthcare.co.za).

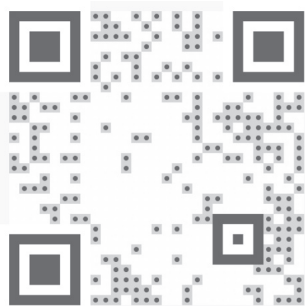
Should you not be satisfied with the outcome, you also have the right to lodge a complaint regarding the processing of your personal information with the Information Regulator. In terms of POPIA, you are also entitled to direct a complaint to the Office of the Information Regulator, South Africa at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001. P.O Box 31533, Braamfontein, Johannesburg, 2017. Email general – [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za); Complaints – [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za).

## Your obligations

You have the following obligations in relation to your or a third-party's personal information:

- You are required to provide any personal information we reasonably require (in a form acceptable to us) to meet our obligations in connection with the services we provide to you, including any legal and regulatory obligations. Where you fail to provide or delay in providing information we reasonably require fulfilling these obligations, we may be unable to offer the services to you and/or we may terminate the services provided with immediate effect.
- As a patient or guarantor, you may supply us with your next of kin's personal information. It is your responsibility to ensure that your next of kin will not object to the processing of their personal information.

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- We rely on the availability of accurate personal information in order to provide the services to you and operate our business. You are obliged to inform us of any changes to your personal information as provided that may change from time to time, including, but not limited to your contact information, address and details of any changes to your medical aid cover or beneficiaries (where applicable). It is the duty of the patient and guarantor to highlight any changes to their personal information that they have provided to ensure the personal information we process remains up to date, accurate and complete and to ensure the proper management and administration of services provided to you.

## Artificial intelligence (AI)

We may use AI for streamlining administrative processes and or for business purposes, including but not limited to data analysis, pattern recognition, and trend identification in conjunction with third-party service providers. Any personal information processed through AI or via AI applications will be handled with the utmost confidentiality and in compliance with applicable privacy laws and this Privacy Notice.

## Aggregated data practices

We may process data which may include your personal information for our legitimate purposes including statistical, research and analytical purposes. Such processing of data may include the retention and transfer of your personal information to contracted third-parties.

We shall maintain the confidentiality of your information through adequate security measures including de-identification or anonymisation of the information before it is shared with third-parties.

## Changes to our Privacy Notice

We keep our Privacy Notice under regular review, and as a result, it may be amended from time to time without notice. We encourage you to review this Privacy Notice regularly.

***This Privacy Notice was last updated in May 2025. All rights reserved.***

***Life Healthcare, Oxford Parks, 203 Oxford Road  
(Corner Eastwood & Oxford Roads), Dunkeld, 2196***

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