	LIFE HEALTHCARE	
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	CLASSIFICATION: PUBLIC	6
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Privacy Notice

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

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 are accepting or consenting to the practices as described or referred to in this privacy notice.

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


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 relevant privacy and national health laws. Depending on what services you receive from us this may include Special personal information, as defined in POPIA, such as information relating to your health. The disclosure of your personal information to Life Healthcare is mandatory and required in terms of the services provided to you or agreements with you unless otherwise indicated as voluntary at the point of collection, for example where consent is requested.

When do we collect personal information about you?

We may collect information about you 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.

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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.

Justification for processing your personal information

- We will process your personal information only where we have a lawful justification to do so, as required by section 11 of the Protection of Personal Information Act 4 of 2013 ("POPIA"). Depending on the nature of our interaction with you, we rely on one or more of the following grounds:
 - Your consent
 - Where you have given us specific, informed, and voluntary consent to process your personal information for a defined purpose, we will rely on that consent as our justification.
 - You have the right to withdraw your consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal. Withdrawal of consent may affect our ability to provide certain services to you.
 - Performance of a contract
 - Where processing is necessary to enter into or perform a contract to which you are a party, or to take steps at your request prior to entering into such a contract, we will process your personal information on that basis.
 - Compliance with a legal obligation
 - Where we are required by law to process your personal information (including obligations arising from health legislation, regulatory frameworks, or orders of a competent authority), we will do so to fulfil that obligation.
 - Protection of your legitimate interests
 - In limited circumstances, we may process your personal information where it is necessary to protect an interest of yours that cannot reasonably be protected by other means, including circumstances involving your health or safety.
 - Our legitimate interests or those of a third party
 - We may process your personal information where it is necessary for the purposes of our legitimate interests or the legitimate interests of a third party to whom we disclose your information, provided that such interests are not overridden by your right to privacy or your other fundamental rights and interests.

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- Performance of a public law duty (if applicable)
 - Where we are a public body or act in a public capacity, we may process personal information where necessary for the proper performance of a public law duty.
- Special personal information
 - Where we process special personal information (including information concerning your health, medical history, or biometric data), we will do so only in accordance with section 26 and section 27 read in conjunction with section 32 of POPIA.
- 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.


The security and storage of your personal information

Your personal information will be kept confidential and secure and will, unless you agree otherwise, only be used for the purpose(s) for which it was collected and in accordance with this our applicable Privacy notice, POPIA and national health laws.

Organisational and technical security measures

We have appropriate organisational and technical security measures in place to prevent unauthorised access or unlawful processing of personal information and to prevent personal information being lost, destroyed or damaged. We monitor our information systems in an endeavor to ensure that the ongoing security is robust. All personal information you provide to us is stored securely. 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 a 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 are not 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,

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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 security information office, as they are often sent and received on personally owned devices. We have no control over the security of instant messaging platforms or of 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 processing 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.

Transfer of personal information outside of the Republic of South Africa (RSA) in terms of the POPIA

- Any cross-border transfer of personal information will be undertaken strictly in accordance with section 72 of POPIA. Accordingly, we will only transfer personal information outside South Africa where one or more of the following conditions are met:
 - the recipient is subject to a law, binding corporate rules, or contractual obligations that provide an adequate level of protection for personal information that is substantially similar to the protection afforded under POPIA; or
 - the transfer is necessary for the performance of a contract between you and Life Healthcare, or for the implementation of pre-contractual measures taken at your request; or
 - the transfer is necessary for the conclusion or performance of a contract concluded in your interest between Life Healthcare and a third party; or
 - you have consented to the transfer after having been informed of the possible risks associated with transferring personal information to a country that may not have data protection laws equivalent to those of South Africa; or
 - the transfer is otherwise permitted or required by law.
- Where third party service providers outside South Africa are used, we require appropriate contractual safeguards to be in place to ensure that personal information is processed only for lawful purposes, remains confidential and secure, and is not processed in a manner that undermines the protections provided for under POPIA.
- Life Healthcare does not transfer personal information outside South Africa for the purpose of circumventing the protections afforded to data subjects under POPIA.

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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 server. This website usage information serves as an indicator of how visitors of the website make use of the website, the amount of times which 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 a security breach, the IP address will be used to identify the user by the internet service provider and contact will be made thereafter. Life endeavors to ensure that your IP address is not processed in a manner that infringes on your privacy.


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. These may include the following:

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 is 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 the necessary 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 as a healthcare institution, 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, integrated medical service provider, other institution, person or company.


In instances where Life Healthcare does share your personal and health information with third parties, Life Healthcare undertakes to share only those aspects of your 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.

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In addition, Life Healthcare may be required to disclose your personal and health information in terms of a court order or other law. Upon your request, we will notify 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, you grant Life Healthcare the right to 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.
- 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 team 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, for the purposes of running and administering our day-to-day operations and subject to them being bound to confidentiality; in respect of any outstanding hospital account, to share your information with third parties assisting us in recovering payment on the account from you (such as debt recovery agents or attorneys).
- To administer and manage funder claims.
- Where relevant to your condition, 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 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. In addition, should you choose not to participate in the post-discharge survey you may select to opt out of participating and we will cease from processing your information any further 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 website 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 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.
- To share your information with third party marketing companies for the purpose of sending marketing emails, subject to obtaining appropriate consent.

Note:

- Life Healthcare does not currently use personal information contained in its directories for direct marketing relating to the sale of goods or services.
- Should Life Healthcare initiate any direct marketing in the future involving electronic communications, such processing will only occur where permitted by law and, where required, after obtaining your prior consent in accordance with section 69(1) of the Protection of Personal Information Act, 2013 (“POPIA”).
- You will at all times retain the right to object to such processing and to opt out of direct marketing communications in accordance with sections 11(3)(b) and 69(3)(c) of POPIA, by submitting an objection to the Group Information Officer using the contact details set out below.
- 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 endeavor 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, and depending on the circumstances, the consultant may act as a responsible party or the operator. Consequently, the consultant, where appropriate shall be deemed to be the responsible party of your personal information and will be required to maintain their own records in accordance with POPIA and applicable confidential clinical guidelines and retention periods.
- Regulators: We may be requested – and in some cases can be required - to share certain information (including personal information and special personal information) about you and your care with regulators such as the Department

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of Health, the Health Professions Council, Mental Health Review Boards (where applicable), or the National Institute for Communicable Diseases of South Africa (“NICD”). 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 ‘legitimate interest’ (i.e. your life or your health) as envisaged in the National Health Act and underpinned by the Health Professions Council of South Africa Guidelines.
- 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.

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 securely retained for a limited period. Machine monitoring may be applied to ensure improved security and safety.

Artificial intelligence (AI)

We may use AI for streamlining administrative processes and analytical purposes, including but not limited to data analysis, pattern recognition, and trend identification. All data processed through AI will be handled with the utmost confidentiality and in compliance with applicable privacy laws.

Statistical research and analytics

To provide you with improved value-based care and to analyze trends we reserve the right to retain, process and share your personal and health information with contracted third parties for statistical, historical, research (including clinical research) and/or analytical purposes. In such instances, we shall maintain the confidentiality of your information through adequate security measures such as de-identification or anonymisation of the information concerned.

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Suppliers and vendors

We may process your personal information 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.

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 as provided for in section 23 of POPIA.
- **Right to rectification:** the right to have inaccurate information about you corrected or removed.
- **Right to erasure:** the right to request correction, destruction or deletion of personal information under circumstances permitted by POPIA.
- **Right to object:** the right to object to the processing of personal information under specific circumstances permitted by POPIA.
- **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 with your chosen product or service.
- **Right in relation to automated decisions:** in terms of section 71, you have the right not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you, unless it is necessary for entering into a contract with you, it is authorised by law, or you have given your explicit consent. We will let you know when such decisions are made, the lawful grounds we rely on and the rights you have.

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Please note: Your 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

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 Woodmead North Office Park 54 Maxwell Drive Woodmead, Johannesburg, 2191. Email general – enquiries@infoeregulator.org.za; Complaints – POPIAComplaints@infoeregulator.org.za

Your obligations


You have the following obligations in relation to your personal information:

- As a patient or guarantor, you may supply Life Healthcare with your next of kin's personal information – this will only be processed where required to protect your legitimate interests or our legitimate business interests. It is your responsibility to ensure that your next of kin will not object to the provision and or processing of their personal information.
- In order to ensure that our systems remain up to date, accurate and complete, you are obliged to inform the Life Healthcare Group 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). The data subject It is the duty of the patient and guarantor to highlight any changes to their personal information that they have provided Life Healthcare to ensure our systems remain up to date, accurate and complete.

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Categories of mandatory personal information that may be collected where relevant:

- Patients - natural persons: names; contact details; physical and postal addresses; date of birth; ID number; tax related information; nationality; gender; confidential correspondence. Health; diet/religious and ethnic information including; family medical history; Location; Employment details; Next of kin; Legal guardians; Guarantors; Financial details including bank account details; CCTV surveillance.
- Clients – juristic persons / entities: names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners.
- Clients – foreign persons / entities: names; contact details; physical and postal, financial information addresses; date of birth; passport number tax related information; nationality; gender; confidential correspondence; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.
- Contracted service providers: Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.
- Intermediary / advisor: Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.
- Employees / directors / potential personnel / shareholders / volunteers / employees' family members / temporary staff: gender, pregnancy; marital status; race, age, language, education information; financial information; employment history; ID number; next of kin; children's name, gender, age, school, grades; physical and postal address; contact details; opinions, criminal behaviour and/or criminal records; well-being; trade union membership; external commercial interests; medical information.
- Website end-users / application end-users: names, electronic identification data: IP address; log-in data, cookies, electronic localization data; cell phone details, GPS data.

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Categories of voluntary personal information that may be collected where relevant

- Participation in clinical trials and research
- Participation in quality surveys and customer feedback surveys

Changes to our privacy notice

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

This privacy notice was last updated in April 2026. All rights reserved.

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