
DR ILSA ORREY • DERMATOLOGIST
M.B. Ch.B. (UCT), FCP (SA), FCDerm (SA)

PRIVACY NOTICE

1. INTRODUCTION

- 1.1. We are committed to safeguarding the privacy of all our patients.
- 1.2. This notice applies where we are acting as a responsible party; in other words, we determine the purposes and means of the processing of that personal data and sets out the manners and purpose for the lawful processing of your personal information, in compliance with our obligations in terms of the Protection of Personal Information Act ("POPIA").
- 1.3. In this notice, "we", "us" and "our" refer to Dr Orrey Derma Clinic.

2. THE PERSONAL DATA THAT WE COLLECT

- 2.1. In this Section 2, we set out the general categories of personal data that we process [and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data].
- 2.2. We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers.
- 2.3. We may process your website user account data ("**account data**"). The account data may include your account identifier, name, email address, business name, account creation and modification dates.
- 2.4. We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication.
- 2.5. We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your service use.
- 2.6. We may process health-related information about you, including your medical history, diagnostic records, treatment plans, photographs of skin conditions, and prescriptions. You understand that this information is classified as "special personal information" in terms of POPIA and you explicitly authorize us to process this information on your behalf.

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- 2.7. We may process information enabling us to identify you, including your name, surname, ID and / or passport number.
- 2.8. We may process your financial information, for billing and medical aid claim purposes. This may include details about your medical aid, such as your scheme name, plan and medical aid number, as well as your bank card information.

3. PURPOSES OF PROCESSING AND LEGAL BASES

- 3.1. In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 3.2. **Operations** - We may process your personal data for processing and fulfilment of orders, providing our services, supplying our goods, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our services and business, OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.3. **Publications** - We may process account data for the purposes of publishing such data through our services in accordance with your express instructions. The legal basis for this processing is consent OR our legitimate interests, namely the publication of content in the ordinary course of our operations, OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.4. **Relationships and communications** - We may process contact data, account data, transaction data, and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax, and/or telephone, providing support services, and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our visitors, service users, individual customers, and customer personnel, the maintenance of relationships, and the proper administration of our website, services, and business.
- 3.5. **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases, and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this notice.
- 3.6. **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services, and business, and the protection of others.

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- 3.7. **Insurance and risk management** - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.8. **Legal claims** - We may process your personal data where necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights, and the legal rights of others.
- 3.9. **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.
- 3.10. **Improving our services** - We may process your personal information to improve the services we offer. This includes using certain personal information relating to your communication with us to train any artificial intelligence agents, chatbots, and other automated communication tools, to improve the quality and efficiency of our communications with you.

4. PROVIDING YOUR PERSONAL DATA TO OTHERS

- 4.1. Contact, Account, Communication and Usage data of all our patients will be stored on the servers of our hosting services providers.
- 4.2. We may disclose Contact, Account, Communication and Usage data of all our patients to our suppliers or subcontractors insofar as reasonably necessary. This may include sharing information about our services to you with your medical aid provider and other healthcare practitioners.
- 4.3. Financial transactions relating to our services are handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries relating to such payments and refunds.
- 4.4. In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.5. If you specifically authorize us to do so, we may provide personal information relating to your communications with us to a third party service provider who will use it to train an Artificial

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Intelligence Agent (“AI Agent”) for the purpose of improving our communications with you. You may opt out of this at any time.

5. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

- 5.1. We may transfer your personal data from South Africa across borders with your prior written consent.
- 5.2. We will make an adequacy determination with respect to the data protection laws of each of these countries. Transfers to these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the competent data protection authorities.

6. RETAINING AND DELETING PERSONAL DATA

- 6.1. This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3. We will retain your personal data as follows:
 - 6.3.1. **Contact data** will be retained for a minimum period of 6 years following the date of the most recent contact between you and us, and for a maximum period of indefinite following that date.
 - 6.3.2. **Account data** will be retained for a minimum period of 6 years following the date of closure of the relevant account, and for a maximum period of indefinite following that date.
 - 6.3.3. **Transaction data** will be retained for a minimum period of 6 years following the date of the transaction, and for a maximum period of indefinite following that date.
 - 6.3.4. **Communication data** will be retained for a minimum period of 6 years following the date of the communication in question, and for a maximum period of indefinite following that date.
 - 6.3.5. **Usage data** will be retained for a minimum period of 6 years following the date of collection.
- 6.4. Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

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7. SECURITY

We undertake to implement reasonable technical and organizational measures to safeguard the integrity and confidentiality of your personal information and to prevent unauthorized access, damage, or destruction thereto. We will notify you as soon as possible of becoming aware of any suspected unauthorized access to, damage, or destruction of your personal information.

8. YOUR RIGHTS

8.1. Your principal rights under data protection law are:

- 8.1.1. the right to access - you can ask for copies of your personal data;
- 8.1.2. the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- 8.1.3. the right to erasure - you can ask us to erase your personal data;
- 8.1.4. the right to object to processing - you can object to the processing of your personal data;
- 8.1.5. the right to complain to a supervisory authority - you can complain about our processing of your personal data; and
- 8.1.6. the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent, provided that, if you do so, we may no longer be able to render some, or all, of our services to you.

8.2. These rights are subject to certain limitations and exceptions.

8.3. You may exercise any of your rights in relation to your personal data [by written notice to us, using the contact details set out below].

(+27) 21 762 0760

(+27) 21 797 4294

derm@dermaclinic.co.za

drorrey@dermaclinic.co.za

9. AMENDMENTS

9.1. We may update this notice from time to time by publishing a new version on our website.

9.2. You should check this page occasionally to ensure you are happy with any changes to this notice.

9.3. We may notify you of changes to this notice by email.

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10. OUR DETAILS

10.1. We are registered in Cape Town, Western Cape, South Africa under registration number 2015/069186/21, and our registered office is at:

Suite G6 Steenberg House
Steenberg Office Park Silverwood Close
Westlake Cape Town
Western Cape
7945.

10.2. Our principal place of business is at:

Suite G6 Steenberg House
Steenberg Office Park Silverwood Close
Westlake Cape Town
Cape Town
7945

AND

Dr I Orrey
Room 206, East Suites
Mediclinic Constantiaberg
Burnham Road
Plumstead
Cape Town
7800

10.3. You can contact us:

- 10.3.1. Using our website contact form;
- 10.3.2. By telephone, on the contact number published on our website; or
- 10.3.3. By email, using the email address published on our website.

11. INFORMATION OFFICER

11.1. Our Information Officer's contact details are:

(+27) 21 762 0760
(+27) 21 797 4294
karla@dermaclinic.co.za

021 797 4294
drorrey@dermaclinic.co.za
www.dermaclinic.co.za
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12. DATE

12.1. Date last reviewed: 29 November 2024