

# Privacy Policy

## Data Protection Information for the Processing of Personal Data

(‘Data Privacy Statement’)

### SURE MEDICAL WEBSITE PRIVACY STATEMENT

Your privacy is important to us. With this Data Privacy Statement, we inform you about the processing of personal data in connection with the use of the Sure Medical website as well as about your existing data protection rights.

## 1. General Information

Regarding the processing of your personal data for this website controller according to Protection of Personal Information Act 4 of 2013 is

Sure Medical Pty Limited  
Devander House Office Park, 298 Stokkiesdraai street, Erasmusrand, Pretoria, 8100, SA.  
Tel: +27 79 3111 071  
Fax: +27 866 959 055  
[info@suremedical.co.za](mailto:info@suremedical.co.za)

Further information on Sure Medical Pty Limited can be found on the website:  
[www.suremedical.co.za](http://www.suremedical.co.za)

You can contact our Information Officer by e-mail to [claudia@suremedical.co.za](mailto:claudia@suremedical.co.za) or by mail to the above postal address of our South African Head Office by using the reference "Information Officer".

## 2. Types of Data Processed

While visiting our Sure Medical website personal data is processed. Personal data are all information relating to you personally or which can be assigned to you. All personal data on this website will be processed in compliance with POPIA and all other relevant laws. The personal data processed on this website can be divided into the following categories:

### 2.1 Access Data

Access data are information that is necessary to enable the use of our webpages and online services. This includes in particular:

- Browser type and browser version,
- Used operating system,
- Internet Service Provider,
- IP address of the requesting device,
- Date and time of the server request,
- Website from which our website is accessed (referrer URL),
- Websites that are accessed by your system through our website.

## 2.2 Master Data

Master data are information about you that is required to identify you and, if necessary, to contact you. This includes the following information:

- Name and surname,
- Date of birth,
- Address,
- E-mail address,
- Phone number,
- Zip code.

## 2.3 Log data

Log data are information that is used to record certain actions on our websites. Log data is collected to ensure the security and integrity of the website and to document and assign certain actions for reasons of legal security. This includes:

- Date and time of an operation,
- IP address of the device used to perform a specific action.

## 2.4 Health Data

Health data is personal data relating to physical or mental health, including the provision of health services that contains information about your state of health. This may include information about you:

- Medical treatments,
- The aids used,
- Pre-existing conditions,
- Diagnoses,
- Dietary requirements,
- Hospital stays,
- The attending physicians

## 3. Data Processing when Using the Website

### 3.1 Visiting the Website

When you access the website access data is automatically sent from your browser to the server of our website without your intervention. This is necessary to ensure a smooth connection of the website as well as a comfortable use of the website and to ensure and optimize the system's security and stability. This information is stored for the duration of the session in a cookie on your device and temporarily in a so-called log file in our systems, whereby the IP address on our server is alienated so that an assignment of the website visitor is no longer possible. A further processing of this access data does not take place.

The legal basis for data processing is our legitimate interest arises from the aforementioned purposes. If access data (anonymized) is stored on our server, the data is usually deleted.

## 3.2 General Contact Requests via the Website

For general contact enquiries we offer you the possibility to contact us via

- a form provided on the website,
- an e-mail provided on the website or
- a telephone number provided on the website.

When using the contact form, it is necessary to provide a valid e-mail address and first and last name so that we know who sent the request and we can answer it. For the assignment of your inquiry to one of our contact persons in your area, the specification of your address is necessary. We also collect this information from you when you contact us by e-mail or telephone. If we collect your e-mail address when you contact us by e-mail or telephone, we will also use it to send you our data protection information.

Data processing for the purpose of establishing contact by means of a contact form is carried out; our legitimate interest lies in answering and processing your enquiry, for which the storage of data is necessary. If we are in a contractual relationship with you, or if the contact serves to initiate a contractual relationship, the processing shall also take place. If you submit information also on your health (health data) lawful basis for the processing of this data for the only purposes of addressing your request is a consent given by you. You have the **right to withdraw your consent** at any time. Please contact us using the contact details listed in **section 1** of this Data Privacy Statement.

Personal data that we collect from you in connection with a contact request will be deleted as soon as your request has been finally processed. As far as a business initiation or a contractual relationship results from your contact enquiry, this information is usually stored until the contractual relationship has been settled and there are no storage periods to the contrary.

## 3.3 Education Course Registration

You may register for our or our partners education and training courses through our or their website by using our education registration form. Through this form we collect your master data (name, surname, job title, organization, e-mail address, address, phone number) necessary to process your registration. You may leave us a comment regarding your registration. We use your person only to enable course registration and to conduct the courses. Additionally, we request you for information on any dietary requirements to ensure consideration of any such needs and health safety for you during our courses. This information may contain information on your health status.

We may share your personal data (name, job title, organization, city, country and course information) with our internal training and education team as well as course directors if necessary.

Lawful basis for the processing if we are in a contractual relationship with you or if the processing serves to initiate a contractual relationship. Beyond such relationship, we process your data based on a legitimate interest. The legitimate interest lies in providing our course upon your request. If you provide us with information on your health status, especially regarding dietary requirements, lawful basis is your explicit consent by clicking the provided checkbox. You may withdraw your consent at any time (see our contact details, **section 1**). Please note: if you do not wish to give your consent, we may not process any data relating to your health including information on dietary requirements.

## 3.4 Cookies

### 3.4.1 Characteristics and Functionality of Cookies

Our websites and sub-sites use cookies. Cookies are text files that are stored in your internet browser or by the internet browser on your computer system when you use the website. When you access a website, a cookie can be stored on your operating system. This cookie contains a string of characters that enables the browser to be uniquely identified when the website is recalled.

### 3.4.2 Categories of Cookies

We use the following categories of cookies:

**Necessary cookies** enable the use of a website. They enable basic functions such as page navigation and access to secure areas of the website. Without these cookies the website will not work properly.

**Statistic cookies** help website owners understand how visitors interact with websites by anonymously collecting and reporting information.

## 4. Storage period

Insofar as no explicit storage period is specified in this Data Privacy Statement, personal data will be stored for as long as is necessary for the specified purposes or the fulfilment of our legal obligations.

In all other respects, the storage period shall be governed by the legal retention periods, for example according to commercial and tax law. At the latest, after expiry of these periods, the data stored and retained by us will be deleted, unless further storage is necessary in exceptional cases.

## 5. Right to Object

You may object to the processing of your data on grounds relating to your particular situation, insofar as we process them for our legitimate interest. In the event of objection, we shall refrain from any further processing of your data unless it is necessary for overriding, compelling or legitimate reasons or for the assertion, exercise or defense of legal claims.

If you wish to exercise your right of objection, please contact us or our Data Protection officer. The contact details can be found under **section 1** of this Data Privacy Statement.

## 6. Rights of the Data Subject

In addition, you have the **right to obtain information** about your personal data processed by us at any time under the conditions POPIA 4 of 2013. In particular, you may request information about the purposes of the processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the envisaged storage period, the existence of a right of rectification, deletion, limitation of the processing or opposition to the existence of a

right of appeal, the origin of your data if it has not been collected from us, as well as the existence of an automated decision making process including profiling and, if applicable, meaningful information on its details.

Within the scope of your **right to information**, you may request a copy of your personal data. Data copies are generally made available in electronic form, unless you have indicated otherwise. The first copy is free of charge for you, for further copies a reasonable fee may be charged. The provision shall be subject to the rights and freedoms of other persons who may be affected by the transmission of the data copy.

You may immediately request the **correction of incorrect or incomplete personal data** stored by us.

In addition, you may, in principle, request the **deletion of your personal data** stored by us, insofar as the processing is not necessary for the exercise of the right to freedom of expression and information, for the fulfilment of a legal obligation, for reasons of public interest or for the assertion, exercise or defense of legal claims.

You may also demand that the **processing** of your personal data be **restricted** if you dispute the accuracy of the personal data stored by us. In this case, we have to limit processing of your data for the duration of the examination of your request. You can also demand the restriction if the processing is unlawful, but you refuse to delete it or if not we but you need your data stored with us to assert, exercise or defend legal claims.

If we process data based on a consent given by you, you are also entitled to **withdraw your consent** at any time. This also applies to declarations of consent issued to us before the POPI Act came into force, i.e., before 1 July 2021. Your withdrawal means that we will not continue the data processing, which until then was based on this consent, for the future.

Please contact our Information Officer regarding your data protection rights. The contact details can be found under **section 1** of this Data Privacy Statement.

## 7. Right of Appeal

If you are of the opinion that the processing of your personal data by us violates the provisions of data protection law, you also have the right to lodge a complaint with a supervisory authority.

## 8. Further Queries

Should you have any questions regarding the processing of your personal data by us and the associated rights as well as other data protection notices and suggestions, you can contact our Information Officer at any time in confidence. You will find the contact details of our Information Officer under **section 1** of this Data Privacy Statement. All inquiries to our Information Officer will of course be treated strictly confidential.

Status: June 2021