

PRIVACY POLICY

1 INTRODUCTION

- 1.1 Welcome to our privacy policy. We are Wits Health Consortium (Pty) Ltd (Registration number 1997/015443/07) (herein after WHC / we / us) and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously.
- 1.2 References to WHC will include each of WHC's divisions and be applicable to personal information shared with WHC and its divisions as provided for herein.
- 1.3 The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

2 AUDIENCE

- 2.1 This policy applies to you if you:
- 2.1.1 are a visitor to our website;
 - 2.1.2 share any personal information with Wits Health Consortium (Pty) Ltd;
 - 2.1.3 are an employee;
 - 2.1.4 interact and / or communicate with us in any way; or
 - 2.1.5 are our data subject.

3 PERSONAL INFORMATION

3.1 Personal information includes:

- 3.1.1 certain information that we collect automatically when you visit our website;
- 3.1.2 certain information collected on registration for training, services, or other purposes and in as far as may be applicable;
- 3.1.3 certain information collected on submission; and
- 3.1.4 optional information that you provide to us voluntarily (see below).

3.2 but excludes:

- 3.2.1 information that has been made anonymous so that it does not identify a specific person;
- 3.2.2 permanently de-identified information that does not relate or cannot be traced back to you specifically;
- 3.2.3 non-personal statistical information collected and compiled by us; and
- 3.2.4 information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

3.3 Common examples

- 3.3.1 Common examples of the types of personal information which we may collect, and process include your:

Title:	Privacy Policy	
Version:	1	Authorisation
Date:	June 2021	A.A. Farrell

PRIVACY POLICY

- 3.3.1.1 **identifying information** – such as your name, date of birth, or identification number of any kind;
- 3.3.1.2 **contact information** – such as your phone number or email address;
- 3.3.1.3 **address information** – such as your physical or postal address; or
- 3.3.1.4 **demographic information** – such as your gender or marital status.

3.4 Sensitive personal information

- 3.4.1 Depending on the personal information submitted to us by yourself, we may also collect sensitive personal information including your:
 - 3.4.1.1 **financial information** – such as your bank account details;
 - 3.4.1.2 **sensitive demographic information** – such as your race or ethnicity;
 - 3.4.1.3 **medical information** – such as information about your physical or mental health;
 - 3.4.1.4 **sexual information** – such as information about your sex life or sexual orientation;
 - 3.4.1.5 **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
 - 3.4.1.6 **employment information** – including your membership of a trade union; and
 - 3.4.1.7 **beliefs** – including your political or religious beliefs.

3.5 Children's information

- 3.5.1 We do collect personal information of children, but only with the consent of a competent person.

4 ACCEPTANCE

4.1 Acceptance required

- 4.1.1 You must accept all the terms of this policy when you use our services. If you do not agree with anything in this policy, then you may not request our services.

4.2 Legal capacity

- 4.2.1 You may not access our website or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

4.3 Deemed acceptance

- 4.3.1 By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all its terms.

4.4 Your obligations

- 4.4.1 You may only send us your own personal information or the information of another data subject where you have their permission to do so.

5 CHANGES

- 5.1.1 We may change the terms of this policy at any time by updating this web page.

Title:	Privacy Policy	
Version:	1	Authorisation
Date:	June 2021	A.A. Farrell

PRIVACY POLICY

- 5.1.2 We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated.
- 5.1.3 If you do not agree with the changes, then you must stop using the website and our services.
- 5.1.4 If you continue to use the website or our services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

6 COLLECTION

6.1 On registration and / or submission

- 6.1.1 Once you interact with us and submit any personal information to us, you will no longer be anonymous to us. In these circumstances, you may provide us with certain personal information.
- 6.1.2 This personal information may include:
- 6.1.2.1 your name and surname;
 - 6.1.2.2 your gender, marital status, national, ethnic or social origin, colour, age and / or disability;
 - 6.1.2.3 information relating to the education, criminal and / or employment history;
 - 6.1.2.4 your email address;
 - 6.1.2.5 your telephone number;
 - 6.1.2.6 your company name, company registration number, and VAT number;
 - 6.1.2.7 financial information; and
 - 6.1.2.8 your postal address or street address.
- 6.1.3 We will use this personal information for the purposes that it was provided for, and for any other purposes set out in this policy or as allowed in terms of legislation.

6.2 From browser

- 6.2.1 We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (**IP address**), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (**usage information**).
- 6.2.2 Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

6.3 Web beacons

- 6.3.1 Our website may contain electronic image requests (called a **single-pixel gif** or **web beacon** request) that allow us to count page views and to access cookies.
- 6.3.2 Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon.

Title:	Privacy Policy	
Version:	1	Authorisation
Date:	June 2021	A.A. Farrell

PRIVACY POLICY

6.3.3 Our web beacons do not collect, gather, monitor, or share any of your personal information. We merely use them to compile anonymous information about our website.

6.4 Optional details

6.4.1 You may also provide additional information to us on a voluntary basis (**optional information**).

6.4.2 This includes content that you decide to upload or download from our website or respond to surveys, obtain certain services, or otherwise use the optional features and functionality of our website.

6.5 Recording calls

6.5.1 We may monitor and record any telephone calls that you make to us unless you specifically request us not to.

6.6 Purpose for collection

6.6.1 We may use or process any information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

6.6.2 Processing includes gathering your personal information, disclosing it, and combining it with other personal information.

6.6.3 We generally collect and process your personal information for various purposes, including:

6.6.3.1 **services purposes** – for any services we may provide;

6.6.3.2 **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions;

6.6.3.3 **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance;

6.6.3.4 **employment purposes** – such as considering and contacting applicants for interviews, drafting employment agreements and keeping agreements on file;

6.6.3.5 **administration and maintenance** – such as records relating to our employees, Funders and Sponsors;

6.6.3.6 **management planning**, forecasting, research and statistical analysis;

6.6.3.7 **audit and record keeping purposes**;

6.6.3.8 **research purposes** in accordance with the Informed Consent Form of the Study Participant and ethics approval.

6.6.4 We may use your usage information for the purposes described above and to:

6.6.4.1 remember your information so that you will not have to re-enter it during your visit or the next time you access the website;

6.6.4.2 monitor website usage metrics such as total number of visitors and pages accessed; and

6.6.4.3 track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

6.7 Consent to collection

6.7.1 We will obtain your consent to collect personal information:

Title:	Privacy Policy	
Version:	1	Authorisation
Date:	June 2021	A.A. Farrell

PRIVACY POLICY

- 6.7.1.1 in accordance with applicable law;
- 6.7.1.2 when you provide us with any information.

7 USE

7.1 Our obligations

- 7.1.1 We may use your personal information to fulfil our obligations to you and any obligations that we may have in law.

7.2 Messages and updates

- 7.2.1 We may send administrative messages and email updates to you about the website.
- 7.2.2 Furthermore, we may communicate with you via email, or other messaging forum, with regards to our services, training offered and any other information that may be relevant to you, and only in accordance with the consent that you have provided.

7.3 Targeted content

- 7.3.1 In as far as may be applicable, while you are logged into the website, we may display targeted adverts and other relevant information based on your personal information.
- 7.3.2 In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser unless you specifically provide us with your consent to do so.
- 7.3.3 Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website.
- 7.3.4 We do not send personal information to advertisers with the referring URL.
- 7.3.5 Once you are on the advertiser's website however, the advertiser is able to collect your personal information.

8 DISCLOSURE

8.1 Sharing

- 8.1.1 We may share your personal information with:
 - 8.1.2 other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our services;
 - 8.1.3 with our sole Shareholder (University of Witwatersrand) and / or any of its companies and / or affiliates;
 - 8.1.4 an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
 - 8.1.5 our services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit) and those to whom we may provide services;

Title:	Privacy Policy	
Version:	1	Authorisation
Date:	June 2021	A.A. Farrell

PRIVACY POLICY

8.1.6 as a Donor funded organisation we may also share personal information with Funders, Sponsors, and Donors;

8.1.7 credit bureaus to report account information, as permitted by law; and

8.1.8 other third parties, as well as third parties who provide us with relevant services where appropriate and vice versa.

8.2 Regulators

8.2.1 We may disclose your personal information as required by law or governmental audit.

8.3 Law enforcement

8.3.1 We may disclose personal information if required:

8.3.1.1 by a subpoena or court order;

8.3.1.2 to comply with any law;

8.3.1.3 to protect the safety of any individual or the general public; and

8.3.1.4 to prevent violation of our customer relationship terms.

8.4 No selling

8.4.1 We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

8.5 Marketing purposes

8.5.1 We do not collect or process the Data Subject's personal information for marketing purposes.

8.6 Employees

8.6.1 We may need to disclose personal information to our employees that require the personal information to do their jobs.

8.6.2 These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

8.7 Change of ownership

8.7.1 If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity.

8.7.2 We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

9 SECURITY

9.1 We take the security of personal information very seriously and always do our best to comply with applicable data protection laws.

9.2 Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders.

9.3 We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Title:	Privacy Policy	
Version:	1	Authorisation
Date:	June 2021	A.A. Farrell

PRIVACY POLICY

10 ACCURATE AND UP TO DATE

- 10.1 We will try to keep the personal information we collect as accurate, complete, and up to date as is necessary for the purposes defined in this policy.
- 10.2 From time to time we may request you to update your personal information on the website. You can review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us.
- 10.3 Please note that to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

11 RETENTION

- 11.1 We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:
- 11.1.1 retention of the record is required or authorised by law; or
 - 11.1.2 you have consented to the retention of the record.
- 11.2 During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.
- 11.3 We may retain your personal information in physical or electronic records at our discretion.

12 TRANSFER TO ANOTHER COUNTRY

- 12.1 We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country.
- 12.2 Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected.
- 12.3 You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

13 RECTIFICATION, UPDATING OR ERASURE OF PERSONAL INFORMATION

- 13.1 You may choose to rectify, update or request that we erase the personal information you have submitted to us, by contacting us by phone or email.

14 LIMITATION

- 14.1 We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

15 RESPONSE TO PERSONAL INFORMATION BREACH

- 15.1 If we suspects or becomes aware of any unauthorized access to any personal information held by us by any unauthorised person or third party, or if we becomes aware of any other security breach relating to personal information held or stored by WHC as envisaged in this Policy, WHC shall immediately notify you in writing.

Title:	Privacy Policy	
Version:	1	Authorisation
Date:	June 2021	A.A. Farrell

PRIVACY POLICY

15.2 In the event of a Personal Information Breach, WHC shall fully and immediately comply with applicable laws, and shall take the appropriate steps to remedy such Personal Information Breach.

16 ENQUIRIES

16.1 If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.

17 IMPLEMENTATION AND EFFECT

17.1 This policy will come into effect on the date of signature of the CEO and shall remain in effect until it is reviewed by the Company.

17.2 The Company shall be entitled to amend or change the policy at its sole discretion.

18 DULY AUTHORISED BY



A.A. FARRELL
Chief Executive Officer

Approval date	1 July 2021
Next review date	1 July 2022

Title:	Privacy Policy	
Version:	1	Authorisation
Date:	June 2021	A.A. Farrell