

THE POLICY ON:

THE PROTECTION AND PROCESSING OF INFORMATION

OF MEDILIFE SA (PTY) LTD, including its subsidiaries and trading names, all staff and all medical practitioners practicing at its locations or making use of its services, hereafter collectively and individually referred to as MEDILIFE or abbreviated as ML or referred to as the "Group".

Definitions

"Business" means the business of the ML Group, which involves all operations of the Group and which includes all matters reasonably connected thereto, including matters relating to legal and corporate governance;

"ML", "ML Group" or "Group" means MEDILIFE SA (PTY) LTD, a company registered in the Republic of South Africa, and its subsidiary companies, various trading names, all staff, associated medical practitioners, associated hospitals, laboratories, referral medical and health practitioners and any person, facility or organization acting on behalf of ML or performing administrative, legal, medical and other services for ML or its associates and patients.

"Data Subject" means any Person whose Information the Group Processes, and this may include Information pertaining to the Group's employees, candidates for employment, customers, suppliers, officers, business associates, partners, and the like.

"Information" means "personal information" and "special personal information" as defined in POPIA.

"Information Officer" means the person described in clause 13;

"Information Regulator" means the information regulator as that term is defined in Section 39 of POPIA;

"Operator" means a Person who Processes Information on behalf of the Group in terms of a contract or mandate, without coming under the direct authority of the Group and may include, without limitation, the Group's attorneys, auditors and its related and/or inter-related companies as that term is defined in Section 2 of the Companies Act, No. 71 of 2008;

"Person" means a person defined in POPIA, and "Persons" will have a corresponding meaning;

"Policy" means this policy and any amendments made to it from time to time;

"POPIA" means the Protection of Personal Information Act No. 4 of 2013;

"Process" and "Processing" means anything that is done by the Group in relation to its Data Subject's Information, whether or not by automated means, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination, distribution, merging, linking, restriction, degradation, erasure and/or destruction of Information;

Background to POPIA

POPIA is South Africa's primary data protection law.

The purpose of POPIA is to promote the protection of Information that is Processed by any Person, by prescribing certain minimum requirements for the Processing of Information.

These minimum requirements must be met in order for a Person to Process Information and include those requirements set forth in clause 4 of this Policy.

It is the policy of the Group that it will comply with the minimum requirements set forth in this Policy and as required by other relevant statutory and professional bodies at all times.

Purpose of this Policy

From time to time in the conduct of its Business, the Group will come into possession of and will concomitantly Process the Information of its Data Subjects.

The purpose of this Policy is to record how the Group will Process the Information of its Data Subjects and, in doing so, comply with the minimum requirements set forth in this Policy.

Minimum Requirements for Processing Information

In order for the Group to Process Information in a manner which is consistent with POPIA, the Group must:

Process the Information lawfully and in a reasonable manner that does not infringe the right to privacy of the Person whose Information is being Processed;

Process the Information for a specific, explicitly defined and lawful purpose related to a function or activity of the Group;

Process the Information only if, given the purpose for which it is Processed, it is adequate, relevant and not excessive and if:

the Person whose Information will be Processed has consented to its Information being Processed;

it is necessary to Process the Information to carry out actions for the conclusion or performance of a contract or to render medical and administrative services to which the Person whose Information will be Processed or his/her legal parent/guardian is a party; or

it is necessary to Process the Information to comply with an obligation imposed by law on the Group or to protect a legitimate interest of the Group and/or the Person whose Information will be Processed;

take reasonable steps to ensure that the Person whose Information will be Processed is aware of the Information that will be Processed, the source from which that Information will be collected and the purpose for which that Information will be Processed;

take reasonable steps to ensure that the Information that is Processed is complete, accurate, not misleading and updated where necessary;

take reasonable technical and organisational measures to secure the integrity and confidentiality of Information that is Processed so as to prevent the loss, damage or unauthorised destruction of Information and the unlawful access to or Processing of Information; and

take reasonable steps to ensure that the Person whose Information will be Processed is aware of his rights in and to his Information.

Purpose of and Processing Information:

The Group will only Process Information for a specific, explicitly defined and lawful purpose related to a function or activity carried out by it.

The Group will accordingly Process the Information of its Data Subjects from time to time for the purpose of carrying on its Business and for good and lawful cause.

The Group will ensure that it only Processes the Information of its Data Subjects for the specific purpose needed and will take reasonable steps to ensure that its Data Subjects are aware of that purpose.

Source of Information:

The Group will Process Information that it receives directly from a Data Subject, information from other healthcare providers and facilities, including medical practitioners, laboratories, hospitals, medical reports, radiology reports and images and any co-lateral information needed or supplied by a relevant party, save where: the Information is public record or has deliberately been made public by the Data Subject; the Data Subject has consented to the collection by the Group of the Information from another source; the collection of Information from a source other than the Data Subject would not prejudice a legitimate interest of the Data Subject, is necessary to maintain or comply with an obligation imposed on the Group by law or to maintain the legitimate interests of the Group or the Information will be used for legal proceedings; it is not reasonably practicable in the circumstances of the particular case to collect the Information directly from a Data Subject, or to do so would prejudice a lawful purpose of the collection, or it has received the consent of a Data Subject to Process Information about that Data Subject that it receives from another source, in which event it may Process Information about a Data Subject that it receives from another source.

Awareness and Consent

The Group is required to ensure that its Data Subjects are aware of the purpose for which their Information is being Processed, the manner in which it will be Processed and their rights in respect thereof. The Group will do this by:

making a copy of this Policy available for inspection at its principal place of business / registered address.

By making use of any of the services of the Group or completing any registration documents, the Data Subjects give implied consent to Process their Information in accordance with POPIA, inter alia, by: consent to the Processing by the Group of their Information; and

requiring applicable Data Subjects to sign any one or more of the documents required.

The Group will catalogue and store the record of consents that it obtains from its Data Subjects.

Retention and safeguarding of Information

The Group is required to store, retain and secure the integrity and confidentiality of its Data Subjects' Information by taking appropriate, reasonable technical and organisational measures to prevent the loss, damage or unauthorised destruction of their Information and to prevent any person from unlawfully accessing their Information.

The Group will accordingly secure the integrity and confidentiality of its Data Subjects' Information, inter alia, by ensuring that:

Information that is in printed form is dealt with only by those representatives of the Group who need to deal with that Information;

Information that is in printed form is stored in a secure cabinet or facility when it is not being Processed;

all employees and officers of the Group who have access to or Process Information keep their workstations tidy and free of Information which is not then being Processed to ensure that any Information that is visible at workstations, and is not being Processed, is not disseminated other than in accordance with the provisions of this Policy;

all Information in electronic form is stored in an online location that is protected from unauthorised access by appropriate hardware and software;

any hardware on which Information is stored is secure and password protected;

employees and officers of the Group will ensure that Information is not displayed upon their computer hardware when they are not themselves Processing that Information on such hardware; and

where any device on which Information is stored is lost or stolen, the Information Officer is immediately notified and the Group will use reasonable endeavours to attempt to recover and/or delete any Information stored upon that device.

The Group will review the Information that it Processes and stores from time to time, and will destroy and/or delete any Information of its Data Subjects that is no longer required for the purpose of this Policy or POPIA, or that it is no longer authorised or obliged to retain.

In the event that it comes to the attention of the Group that its Data Subjects' Information has been accessed, acquired or Processed by any unauthorised person:

the Information Officer will notify the applicable Data Subject or Data Subjects and the Information Regulator as soon as reasonably possible; and

the Group will comply with such directions as the Information Regulator may prescribe.

Disclosure of Information

The Group will not hold its Data Subjects' Administrative Information as its own and will make no claim to ownership thereof, unless a Data Subject agrees otherwise. All medical information is confidential and can only be released with written consent from the Medical Practitioner, Patient or legal guardian.

The Group will only disclose its Data Subjects' Information to those of its employees and officers who need to know for the purpose of performing their reasonable duties and will not disclose Information to

any third party unless the consent of the applicable Data Subject to do so has been obtained or the information need to be shared in the performance of the group's functions.

Notwithstanding the provisions of this Policy, the Group may disclose its Data Subjects' Information without first obtaining consent:

if the Group deems it appropriate to disclose that Information to an Operator for the purpose of rendering medical services and associated administrative services: and/or

if the Group is required by any applicable law or any applicable regulator to disclose that Information.

Information Quality

The Group is required to take reasonably practicable steps to ensure that the Information of its Data Subjects that it Processes is complete, accurate, not misleading and updated where necessary.

The Group will accordingly ask its Data Subjects to verify the completeness and accuracy of the Information provided by them from time to time.

Unsolicited Information

In the event that a Data Subject makes Information available to the Group which is gratuitous and/or not required for the purpose referred to in the normal business of the group, this Policy will not apply, and the Group will use its bona fide efforts to secure that Information, and proceed to delete, erase or destroy that Information as soon as practicable after its receipt.

Data Subject Participation and Rights in and to its Information

Each Data Subject, after having provided adequate proof of identity to the Group, has the right to Request in writing and in the prescribed manner:

request that the Group confirms, free of charge, whether or not it holds Information about that Data Subject;

request the record of or a description of the Information that the Group holds about that Data Subject (at a fee);

request that the Group correct or delete any Information in its possession or under its control about the Data Subject that is inaccurate, irrelevant, excessive, out of date, incomplete or misleading, or to destroy or delete a record of any Information about it that the the Group is no longer authorised to retain, if not in contravention of another regulator regulations or requirement; and

withdraw its consent for the Group to Process its Information at any time, but the withdrawal of consent will not affect:

the Processing of its Information before the withdrawal of consent; nor

the Processing of any of its Information that is required by the Group to comply with law and/or finalise the performance of any agreement that it has entered into with the Data Subject concerned or to collect any money or to finalise any legal or medical matter.

Should any Data Subject wish to exercise any of the rights referred to above, it can do so by contacting the Information Officer who can be contacted in the manner described in this Policy, and the Information Officer will give effect to the Data Subject's request or withdrawal after internal discussion and revert back to the Data Subject within 30 working days.

Information Officer

The Group will appoint an Information Officer.

The name and contact details of the Information Officer can be obtained by sending an email to the following email address: legal@medilifesa.co.za

The Information Officer will be responsible for, inter alia:

ensuring that the Group Processes the Information of its Data Subjects in a lawful and reasonable manner that does not unreasonably infringe its Data Subjects' right to privacy;

providing regular training and support to the employees and officers of the Group who have access to or Process Information, so that they can do so lawfully and in terms of this Policy;

creating awareness about the provisions of this Policy, including by way of the mechanisms contemplated in this Policy; and

ensuring that it applies due diligence in the monitoring of developments in relation to the law pertaining to protection of Information, and in amending and/or updating the Group's approach to such protection, including by way of updating and/or amending this Policy.

The Information Officer will be trained appropriately to give effect to this Policy, and will address any reasonable queries or concerns that any Data Subjects may have regarding this Policy or the Processing of their Information as contemplated in it.

Information Regulator

In the event that any of the Group's Data Subjects has any queries or concerns that cannot be addressed by the Information Officer, the Data Subject has the right to contact the Information Regulator. The Information Regulator's details are as follows:

- Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017

Status of Policy

This Policy has been adopted by and will apply to the Group.

Amendments

The Group may alter or amend this Policy or any part thereof at any time. The Group will use reasonable endeavours not to change this Policy too often, and to bring to its Data Subjects' attention any material changes to it, but its Data Subjects will be required to ensure that they keep up to date with the latest

version of the Policy that is available on the Group's website and at the Group's principal place of business.