

PRIVACY POLICY

Purpose of this Privacy Policy

3Sixty Health (Pty) Ltd (“3Sixty Health”) is committed to protecting your personal data. We will use your information in our daily process to provide services to you as our valued members, to meet our legal and regulatory obligations. We will collect and use personal data in accordance with our values, applicable laws and with respect for privacy.

A. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“**Cookie**” means a small text file placed on your computer or device by our website when you visit certain parts of our website and/or when you use certain features of our website.

“**Personal Information**” means and refers to personal information about you, and your employees (as relevant). It includes information about race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of individual, education, medical, financial, criminal, employment history, any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, biometric information.

“**POPIA**” means Protection of Personal Information Act 4 of 2013

“**Process(ing) of Information**” means the lawful and reasonable automated or manual activity of collecting, recording, organisation, storing, updating, distributing, and removing or deleting of Personal Information to ensure that such processing is adequate, relevant, and not excessive given the purpose for which it is processed.

1. 3Sixty Health will not collect, collate, process, or reveal your Personal Information without your permission, unless we are legally required to do so.
2. 3Sixty Health will only request, collect, collate, process, or store your Personal Information if it is lawful for us to do so.
3. We will collect your Personal Information whenever you use our website, contact us electronically, or use one of our products or services.
4. We may process Personal Information for the activation of a product or benefit and to pursue a legitimate interest. If you are giving consent for a minor (person under age 18) you confirm that you are a competent person and that you have authority to give consent for them.
5. You agree that we may transfer your Personal Information outside South Africa where appropriate or if you give us an email address that is hosted outside South

Africa or for certain administration services like cloud services or for processing, storage, or academic research.

6. To ensure that our records are up to date, you must notify us if any of your Personal Information we hold changes or is no longer valid.
7. You have the right to know what Personal Information we hold about you. You can request a copy of the Personal Information we hold about you.
8. It is important that your Personal Information is kept accurate and up to date. You have the right to update or ask us to update, correct or delete your Personal Information. We may be required to keep your Personal Information as required by the law.
9. We will take appropriate, reasonable technical and organisational steps to protect your Personal Information from loss, misuse, or unauthorised alteration. We will make every effort to make sure that your Personal Information is kept confidential and secure.
10. We will promptly notify you if we become aware of any unauthorised use, disclosure, or Processing of Information.
11. We will not retain your Personal Information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent 3Sixty Health to retaining such information for a longer period.

12. Cookies

We use Cookie technology on our website. A Cookie is a small text file that is saved on your internet browser when you use our website. The Cookie is sent to our computer each time you visit our websites. Cookies make it easier for us to give you a better experience online.

Types of Cookies used on our website:

Session Cookies

These Cookies are temporary and only exist while you browse our website. As soon as you close your browser or move to a different website, they are removed. They allow our website to link your actions during a browser session.

How to disable Cookies

You can stop your browser from accepting Cookies by changing the settings on your web browser. Be aware that restricting Cookies may impact the functionality of our websites. We recommend that you allow Cookies. On most browsers' Cookies are enabled by default. Explore the settings and options on your browser to disable or enable them.

13. Monitoring of electronic communications

We communicate with you through different methods and channels. If allowed by law, we may record and monitor electronic communications to make sure that they comply with our legal and regulatory responsibilities and internal policies.

14. When will we process your Personal Information

3Sixty Health may process your personal information for lawful purposes relating to its business if the following circumstances apply, when:

- i. You have provided consent.
- ii. The law requires or permits it.
- iii. It is necessary to conclude or perform under a contract with a third party which we have a legal or contractual duty to give your Personal Information.
- iv. Personal Information related to children will only be processed when a person with the ability to sign legal agreements has consented to the processing, being the parent or guardian.

15. Consent

A. GENERAL

- i. You agree and consent that we may process your Personal Information to adhere to South African legislative reporting obligations.
- ii. You understand and acknowledge that when you include spouse and/or dependents on your application for medical aid, we will process their Personal Information. By submitting their Personal Information, you hereby confirm that you are duly authorised to share such information with us.
- iii. If you are giving consent for a person under 18 you confirm that you are either the parent or guardian and have the legal authority to provide the consent on behalf of the minor.

B. SPECIFIC – You understand and accept that 3Sixty Health may process your Personal Information for the following purposes:

- i. To verify the accuracy and completeness of any information provided to us in the course of processing an application for membership or providing services related to the membership.
- ii. For administration of your health plan.
- iii. For the provision of relevant information to a contracted third party who requires this information to provide a healthcare service to you on your health plan.
- iv. To profile and analyse risk.

15.1 Right to withdraw your consent:

You may withdraw your consent to the Processing of Information at any time by sending an email to privacy@3Sixtyhealth.co.za. Please note that the revocation does not affect the legality of the data processed thus far.

15.2 Right to object:

As far as the Processing of Information based on legitimate reasons you have the right to object on grounds relating to your situation. As far as the processing of Information for direct marketing purposes you have the right to object at any time.

15.3 Other rights:

As a user you have certain rights. You can request information regarding the personal data processed by 3Sixty Health. Subject to legal requirements you can also submit a request to 3Sixty Health to amend incorrect data, or delete your personal data provided the request does not conflict with a statutory or contractual obligation to retain data.

Contact point for asserting your rights:

You can direct your queries to privacy@3Sixtyhealth.co.za.

15.4 Right to contact Information Regulator:

If you believe that we have used your personal information contrary to this Privacy Notice, you have a right to lodge a complaint with the Information Regulator, under POPIA, but we encourage you first to follow our internal complaints process to resolve the complaint. You can submit your complaint to privacy@3Sixtyhealth.co.za.

If thereafter the complaint has not been adequately resolved then please contact, Information Regulator at JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001: Po Box 31533, Braamfontein, Johannesburg, 2017 or email complaints.IR@justice.gov.za.

16. Change to this Privacy Policy.

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects Personal Information protection.