



## Policy on Protection of Personal Information

### 1. INTRODUCTION

1.1 Welcome to Interactive Medical Services (Pty) Ltd (“**iMeds**”). iMeds provides its “**Clients**” with insurance medical examination services for purposes of medical underwriting. In the provision of such services, iMeds will book appointments with the clients of its clients (“**Clients’ Data Subjects**”), to conduct insurance medical examinations at their place of residence.

1.2 This policy (“**iMeds’ POPI Policy**”) sets out how iMeds:

1.2.1 as Responsible Party, will Process and safeguard the Personal Information (incl. Special Personal Information) of its Data Subjects;

1.2.2 as Operator, will Process and safeguard the Personal Information (incl. Special Personal Information) of Clients’ Data Subjects;

1.2.3 the rights of iMeds’ Data Subjects and Clients’ Data Subjects; and

1.2.4 how iMeds’ Data Subjects and Clients’ Data Subjects can exercise their rights.

1.3 For purposes of iMeds’ POPI Policy, unless the context indicates otherwise:

1.3.1 “**Contractors**” shall mean independent contractors or employees of a temporary employment services provider (colloquially referred to as a “labour brokers”), as defined in the Labour Relations Act 66 of 1995 and the Basic Conditions of Employment Act 75 of 1997;

1.3.2 “**Data Subject**” means persons to whom Personal Information relate and for the purposes of iMeds’ POPI Policy include -

1.3.2.1 Clients;

1.3.2.2 “**Service Providers**”;

1.3.2.3 Directors, employees, learners and interns (“**Employees**”);

1.3.2.4 job applicants (“**Job Applicants**”);

1.3.2.5 website(s) users (“**Website Users**”); and

1.3.2.6 Contractors;



- 1.3.3 **"Information Officer"** means the head of a private body as contemplated in section 1 of the POPI Act.
- 1.3.4 **"Operator"** means an entity or person who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without falling under the direct authority of the Responsible Party.
- 1.3.5 **"Personal Information"** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, as contemplated in section 1 of the POPI Act.
- 1.3.6 **"The POPI Act"** means the Protection of Personal Information Act 4 of 2013, as amended from time to time;
- 1.3.7 **"Process"** (including its cognates **"Processes"** or **"Processing"**) means anything that can be done with Personal Information, as contemplated in section 1 of the POPI Act including its collection, usage, storage, dissemination, modification, or destruction;
- 1.3.8 **"The Regulator"** means the Information Regulator established pursuant to section 39 of the POPI Act;
- 1.3.9 **"Responsible Party"** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information; and
- 1.3.10 **"Special Personal Information"** means Personal Information as described in section 26 of the POPI Act.
- 1.4 Capitalised terms not otherwise defined in iMeds' POPI Policy will have the meaning ascribed thereto in the POPI Act.
- 1.5 Any reference in iMeds' POPI Policy to the singular includes the plural and vice versa.
- 1.6 Any reference in the iMeds' POPI Policy to natural persons includes legal persons and vice versa.
- 1.7 Any reference in the iMeds' POPI Policy to gender includes the other genders.

## **2. OBJECTIVES AND PURPOSE**

- 2.1 The objectives of iMeds' POPI Policy are *inter alia* to:



- 2.1.1 demonstrate iMeds commitment to manage the Personal Information (incl. Special Personal Information) of its Data Subjects and Clients' Data Subjects, in accordance with the provisions of the POPI Act;
  - 2.1.2 state the manner in which iMeds will comply with the provisions of the POPI Act and related best practices;
  - 2.1.3 cultivate an organisational culture that recognises privacy as a valuable constitutional right;
  - 2.1.4 develop and implement internal controls for the purpose of managing the compliance risk associated with the Processing of Personal Information (incl. Special Personal Information);
  - 2.1.5 create business practices and policies that will provide reasonable assurance that the privacy rights of Data Subjects and Clients' Data Subjects are protected and balanced with iMeds' legitimate business interests;
  - 2.1.6 assign specific duties and responsibilities to iMeds' Information Officer; and
  - 2.1.7 raise awareness of Employees, Contractors and Services Providers through training and guidance, so that such persons can consistently comply with the provisions of the POPI Act; and thereby.
- 2.2 The purpose of iMeds' POPI Policy is to protect iMeds, as Responsible Party and Operator, from the compliance risks associated with the Processing of the Personal Information (incl. Special Personal Information) of its Data Subjects and Clients' Data Subjects.

### **3. RIGHTS OF DATA SUBJECTS AND CLIENTS' DATA SUBJECTS**

Where applicable, iMeds will ensure that its Data Subjects and Clients' Data Subjects are made aware of their rights listed below and conferred upon them by the POPI Act.

#### **3.1 The right to be informed**

iMeds recognises that its Data Subjects and Clients' Data Subjects have the right to be notified when:

- 3.1.1 their Personal information (incl. Special Personal Information) is being collected by iMeds; and
- 3.1.2 when iMeds has reasonable grounds to believe that their Personal Information (incl. Special Personal Information) has been accessed or acquired by an unauthorised person.



### **3.2 The right to access Personal Information**

iMeds recognises that its Data Subjects and Clients' Data Subjects have the right to enquire as to what Personal Information (incl. Special Personal Information) iMeds holds about them and to request access to such information.

### **3.3 The right to have Personal Information corrected or deleted**

iMeds recognises that its Data Subjects and Clients' Data Subjects have the right to request, where necessary, that their Personal Information (incl. Special Personal Information) be corrected or (where iMeds is no longer authorised to retain the information) deleted.

### **3.4 The right to object to the Processing of Personal Information**

iMeds recognises that its Data Subjects and Clients' Data Subjects have the right to, on reasonable grounds, object to the Processing of their Personal Information (incl. Special Personal Information). In such circumstances, iMeds will give due consideration to the request and the provisions of the POPI Act and may:

3.4.1 cease to Process of the information; and/or

3.4.2 subject to any statutory and/or contractual record-keeping requirement, approve the destruction of the information.

### **3.5 Right to Object to Direct Marketing**

iMeds recognises that its Data Subjects and Clients' Data Subjects have the right to object to the Processing of their Personal Information for purposes of direct marketing by means of unsolicited electronic communications.

### **3.6 Right to Complain**

iMeds recognises that its Data Subjects and Clients' Data Subjects have the right to lodge a complaint with the Regulator, should they not be satisfied with iMeds' response to any of their above requests. The Regulator is an independent body established pursuant to section 39 the POPI Act. More information about the Regulator and the contact details thereof can be found at <https://www.justice.gov.za/inforeg>



#### **4. EXERCISING THE RIGHTS**

4.1 Pursuant to sections 55 and 56 of the POPI Act, iMeds has appointed an Information Officer to discharge the following duties:

- 4.1.1 encouraging compliance with the conditions for the lawful processing of Personal Information (incl. Special Personal Information);
- 4.1.2 dealing with requests made to iMeds pursuant to the POPI Act; and
- 4.1.3 working with the Regulator on investigations conducted pursuant to the POPI Act.

4.2 Should Data Subjects and Clients' Data Subjects want to exercise any of their above-mentioned rights or want to ask any question/s about how iMeds processes their Personal Information (incl. Special Personal Information) or about iMeds' POPI Policy in general, the General Data Subject Personal Information Request Form (attached hereto as **Annexure A1**) can be completed and sent to [andrew\[at\]imeds.co.za](mailto:andrew[at]imeds.co.za). iMeds' Information Officer will consider all requests received and provide feedback to the Data Subjects and Clients' Data Subjects.

4.3 For the avoidance of any doubt, it is recorded that:

- 4.3.1 despite Data Subjects' request for their Personal Information (incl. Special Personal Information) to be destroyed or deleted, Personal Information will only be destroyed or deleted when iMeds is no longer authorised to retain such records, pursuant to section 14 of the POPI Act;
- 4.3.2 all requests received by the iMeds Information Officer from Clients' Data Subjects will be referred the respective Clients for instruction on how the deal with such requests, as the Clients are the Responsible Parties; and
- 4.3.3 should a Data Subject or Client's Data Subject object to the Processing of his/her/its Personal Information (incl. Special Personal Information) and Processing is accordingly seized, iMeds may not be able to continue with the provision of business services to such Data Subject or Client's Data Subject.

#### **5. GENERAL GUIDING PRINCIPLES**

The guiding principles of iMeds' POPI Policy must be read in conjunction with the POPI Act.



## 5.1 Accountability

- 5.1.1 Failure to comply with the provision of the POPI Act could potentially damage iMeds' reputation and/or expose it to administrative fines and civil claims for damages. Individuals found guilty of violating the provisions of the POPI Act could also be fined or imprisoned for prescribed periods. The protection of Personal Information is accordingly the responsibility of every stakeholder in iMeds.
- 5.1.2 iMeds will ensure that the provisions of the POPI Act are complied with through the encouragement of compliant behaviour.
- 5.1.3 Upon finalisation of an investigation into the alleged infringement of the POPI Act, iMeds may recommend any appropriate administrative, legal and/or disciplinary action to be taken against any Employee reasonably suspected of being involved in any non-compliant activity.
- 5.1.4 Where the act/omission of such Employee was because of ignorance or poor work performance, iMeds will provide further training to said Employee. Any wilful negligence or mismanagement of Personal Information (incl. Special Personal Information) on the part of an Employee will however be considered a serious form of misconduct in response to which iMeds may take appropriate disciplinary action, inclusive of dismissal. Where required, iMeds will also refer the misconduct of the Employee to the appropriate law enforcement agency for criminal investigation and prosecution.

## 5.2 Purpose Specification

iMeds will Process Personal Information (incl. Special Personal Information) only for specific, explicitly defined and legitimate purposes, as set out in **Annexure A2** hereto.

## 5.3 Processing Limitation

- 5.3.1 iMeds, as Responsible Party, will ensure that Personal Information (incl. Special Personal Information) under its control is Processed in a fair, lawful and non-excessive manner and only for a specifically defined purpose.
- 5.3.2 iMeds, as Operator, will ensure that Personal Information (incl. Special Personal Information) under its control is Processed strictly in accordance with the "**Processing Instructions**" of Clients.



5.3.3 iMeds will inform its Data Subjects and Clients' Data Subjects of the reasons for collecting their Personal Information (incl...

5.3.4 iMeds will not, under any circumstances, distribute or share Personal Information (incl. Special Personal Information) with affiliates, business partners or other third parties (e.g. Contractors and Service Providers) if these entities or persons are not directly involved with facilitating the purpose for which the information was originally collected.

#### **5.4 Further Processing Limitation**

Personal Information (incl. Special Personal Information) will not be Processed for a secondary purpose unless that Processing is compatible with the original purpose. Accordingly, where iMeds seeks to Process Personal Information (incl. Special Personal Information) it holds for a purpose other than the purpose(s) set out in Annexure A2 hereto, and where this secondary purpose is not compatible with the original purpose, iMeds will first obtain consent in respect of such secondary purpose from its Data Subjects.

#### **5.5 Information Quality**

5.5.1 iMeds will take reasonable steps to ensure that all Personal Information (incl. Special Personal Information) collected is complete, accurate and not misleading.

5.5.2 Where Personal Information (incl. Special Personal Information) is collected or received from third parties, iMeds will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information with the Data Subject/Clients' Data Subject or by way of independent sources.

#### **5.6 Open Communication**

5.6.1 iMeds will take reasonable steps to ensure that its Data Subjects and Clients' Data Subjects are notified –

5.6.1.1 that their Personal Information (incl. Special Personal Information) is collected; and

5.6.1.2 as to the purpose for which their Personal Information (incl. Special Personal Information) is collected and Processed.



5.6.2 Data Subjects and Clients' Data Subjects will be able to communicate with the iMeds' Information Officer by email to –

5.6.2.1 enquire whether iMeds holds any of their Personal Information (incl. Special Personal Information);

5.6.2.2 request access to such information;

5.6.2.3 request iMeds to update or correct such information;

5.6.2.4 request iMeds to delete or destroy such information; and/or

5.6.2.5 object to the Processing of such information.

## 5.7 Security Safeguards

5.7.1 iMeds will manage the security of its filing systems to ensure that Personal Information (incl. Special Personal) is adequately protected. In this regard, security controls will be implemented to minimise the risk of loss, unauthorised access, disclosure, interference, modification, or destruction.

5.7.2 iMeds will continuously review its security controls, which will include regular testing of protocols and measures put in place to combat cyber-attacks on iMeds' information technology network.

5.7.3 iMeds will ensure that all paper and electronic records, containing the Personal Information (inc. Special Personal Information of its Data Subjects' and Clients' Data Subjects, are securely stored and made accessible only to authorised individuals.

5.7.4 All new Employees will be required to sign employment agreements containing contractual terms for the Processing of their Personal Information (incl. Special Personal Information), as well as a confidentiality clause to reduce the risk of unauthorised disclosures of the Personal Information (incl. Special Personal Information) of other Data Subjects and Clients' Data Subjects for which iMeds is responsible. All existing employees will be notified of iMeds' POPI Policy and receive training in respect of the implementation thereof.

5.7.5 iMeds' will enter addendums to the existing service level agreement with its Operators. Such addendums will contain contractual terms and conditions regulating the Processing of the Personal Information (incl. Special Personal Information) of iMeds' Data Subjects by such Operators.





## **5.8 Retention of Personal Information**

5.8.1 iMeds will delete or destroy the Personal Information (incl. Special Personal Information) of its Data Subject and Clients' Data Subjects, or render it anonymous, within a reasonable time after fulfilling the purposes stated in Annexure A2, unless:

5.8.1.1 retention of the record/s is required or authorised by law;

5.8.1.2 iMeds reasonably requires the record/s for lawful purposes related to its functions of activities;

5.8.1.3 retention of the record/s is required by a contract between the parties thereto; or

5.8.1.4 where the Data Subject or Clients' Data Subject has consented to the retention of the record/s.

5.8.2 Further to section 14(2) of the POPI Act, iMeds may also retain Personal Information (including Special Personal Information) for periods in excess of those contemplated above for historical, statistical or research purposes, as iMeds has established appropriate safeguards against such records being used for any other purposes.

## **6. SPECIAL PERSONAL INFORMATION**

6.1 The POPI Act describes Special Personal Information as information related to:

6.1.1 religious or philosophical beliefs;

6.1.2 race or ethnic origin;

6.1.3 trade union membership;

6.1.4 political persuasion;

6.1.5 health or sex life; or

6.1.6 criminal behaviour or biometric information.

6.2 Although section 26 of the POPI Act places a general prohibition on the processing of Special Personal Information, section 27 provides for exceptions to this general prohibition. iMeds will only Process the Special Personal Information of Data Subjects in compliance with section 27 of the POPI Act.



- 6.3 For the avoidance of any doubt, iMeds does not require its Data Subjects' consent for the Processing of their Special Personal Information, if such Processing complies with section 27 (or section 28 through 33, where applicable) of the POPI Act. In limited circumstances, iMeds may however approach its Data Subject for written consent in respect of the Processing of particularly sensitive Special Personal Information.
- 6.4 The respective Client, as Responsible Party, will secure consent from its Clients' Data Subjects before instructing iMeds to Process their Special Personal Information.
- 6.5 When Processing the Personal Information (incl. Special Personal Information) of Clients' Data Subjects, iMeds will:
- 6.5.1 only process such information for the purpose of providing its business services and in accordance with the Client's Processing Instructions, unless required otherwise required by the POPI Act, in which case iMeds will inform the Client of that legal requirement before commencing Processing unless the POPI Act prohibits such act on grounds of public interest;
  - 6.5.2 immediately inform the Client if iMeds is of the opinion that the Processing Instructions infringes the POPI Act;
  - 6.5.3 ensure that all of iMeds' Employees, Contractors and Service Providers, who have access to such information are subject to suitable confidentiality obligations;
  - 6.5.4 implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to the risks presented by the Processing of such information;
  - 6.5.5 not disclose or transfer such information to any third party except where the third party, prior to such disclosure, has agreed by written contract to be bound by obligations that are no less onerous than the obligations set out in this Agreement; and the Client provides its written prior consent to such disclosure or transfer;
  - 6.5.6 provide all assistance to the Client as reasonably necessary for the Client to meet its obligations under the POPI Act;
  - 6.5.7 promptly notify the Client of any –
    - 6.5.7.1 actual of suspected "Data Breach";



- 6.5.7.2 request for information from or complaint by the Regulator in relation to the Personal Information (incl. Special Personal Information) of the Client's Data Subjects; and
- 6.5.7.3 request from Client's Data Subject to exercise rights under the POPI Act, such as to access, rectify, amend, correct, share, delete or cease the Processing of his/her/its Personal Information (incl. Special Personal Information).

## **7. TYPES OF PERSONAL INFORMATION**

- 7.1 The type of Personal Information (incl. Special Personal Information) Processed depends on the Data Subject/Clients' Data Subject *in re* whom the information relates and the purpose for which such information is required by iMeds, as set out in Annexure A2 hereto. The information will be collected and Processed only for the purposes set out in Annexure A2.
- 7.2 iMeds has, or undertakes to procure, agreements with all its Operators, to ensure that there is a mutual understanding with regard to the protection of its Data Subjects' Personal Information (incl. Special Personal Information). Moreover, the iMeds local Service Providers, including Operators, are also subject to the POPI Act.

## **8. LAWFUL GROUNDS FOR PROCESSING PERSONAL INFORMATION**

- 8.1 iMeds' may rely on any one or combination of below to Process the Personal Information (incl. Special Personal Information) of its Data Subjects and Clients' Data Subjects.
  - 8.1.1 When it is necessary for iMeds to discharge its contractual obligations.
  - 8.1.2 When Data Subjects and Clients' Data Subjects consent to the Processing.
  - 8.1.3 When it is necessary for iMeds to discharge its statutory obligations.
  - 8.1.4 In the pursuit of iMeds legitimate business interests or to protect the legitimate interest of its Data Subjects and Clients' Data Subjects.



## **9. DISCLOSURE OF PERSONAL INFORMATION**

9.1 iMeds may disclose the Personal Information (incl. Special Personal Information) about its Data Subjects and Clients' Data Subjects to third parties, such as Service Providers whose services require access to the information.

9.2 iMeds will not, under any circumstances, distribute or share the Personal Information (incl. Special Personal Information) about its Data Subjects and Clients' Data Subjects with third parties if these entities or persons are not directly involved with facilitating the purpose for which the information was originally collected.

9.3 iMeds will only distribute or share the Personal Information (incl. Special Personal Information) about Customers' Data Subjects with third parties if the respective Client has provided his/her/it's written approval.

9.4 When iMeds shares the Personal Information (incl. Special Personal Information) about its Data Subjects and Clients' Data Subjects, these third parties may be located outside the Republic of South Africa. Should iMeds transfer such information outside of the Republic, it will take the necessary steps to ensure that the information will receive the same level of protection as if it was being processed within the borders of the Republic.

9.5 iMeds may disclose the Personal Information (incl. Special Personal Information) of its Data Subjects and Clients' Data Subjects, where it has a duty or right to disclose such information in terms of applicable laws or where it may be deemed necessary in order to protect iMeds' rights.

## **10. POPI AUDIT**

10.1 iMeds Information Officer will schedule periodic POPI audits in order to –

10.1.1 identify the processes used to collect, record, store, disseminate and destroy Personal Information (incl. Special Personal Information).

10.1.2 determine the flow of Personal Information throughout iMeds;

10.1.3 where necessary, redefine the purpose for gathering and Processing Personal Information (incl. Special Personal Information);

10.1.4 ensure that the processing parameters are still adequately limited;



- 10.1.5 ensure that new Data Subjects and Clients' Data Subjects are made aware of the Processing of their Personal Information;
- 10.1.6 verify the quality and security of Personal Information (incl. Special Personal Information);
- 10.1.7 monitor the extent of compliance with the POPI Act and iMeds' POPI Policy;
- 10.1.8 monitor Operators' compliance to data processing agreements; and
- 10.1.9 monitor the effectiveness of internal controls established to manage iMeds' POPI-related compliance risk.

## **11. AMENDMENTS TO AND REVIEW OF THIS POLICY**

iMeds' POPI Policy may be reviewed and/or amended on an *ad hoc* basis and should iMeds' POPI Policy be amended, the amended document will be made available on iMeds' website.



**Annexure A1 – GENERAL DATA SUBJECT PERSONAL INFORMATION REQUEST FORM**

**PERSONAL INFORMATION REQUEST FORM**

PLEASE SUBMIT COMPLETED FORM TO THE COMPANY’S INFORMATION OFFICER ON

[andrew\[at\]imedcs.co.za](mailto:andrew[at]imedcs.co.za)

PLEASE BE AWARE THAT WE MAY REQUIRE YOU TO PROVIDE PROOF OF IDENTIFICATION / DELEGATION OF AUTHORITY PRIOR TO PROCESSING YOUR REQUEST FOR PROVIDING COPIES OF PERSONAL INFORMATION

<b>A. Particulars of Supplier</b>	
Name & Surname / Trading Name	
Identity / Registration Number	
Place of Business Address	
Contact Number	
Email Address	
<b>B. Request</b>	
I/We request iMeds to -	
(i) provide me/us with a copy or description of the Personal Information it holds about me/us;	<input type="checkbox"/>
(ii) rectify the Personal Information it holds about me/us;	<input type="checkbox"/>
(iii) destroy or delete the Personal Information it holds about me/us; or	<input type="checkbox"/>
(iv) stop processing my/our Personal Information, based on the below-mentioned objection.	<input type="checkbox"/>
<b>C. Further information in support of our request</b>	
<b>D. Signature</b>	
Signature (duly authorised)	
Date	

**Annexure A2 – Types Personal Information Processed by iMeds and the purposes of Processing**



DATA SUBJECT/S	TYPES PERSONAL INFORMATION COLLECTED	PURPOSE OF COLLECTING PERSONAL INFORMATION
CLIENTS	<ul style="list-style-type: none"> <li>• Name, contact details, place of business address, postal address, and service history.</li> <li>• Identification document of natural persons.</li> <li>• Certificate of registration/incorporation for juristic persons. Certificate of name change, where applicable.</li> <li>• Board resolution to confirm designation of authority to signatory of juristic person.</li> <li>• The record of clients' interactions with iMeds to inform marketing strategy, such as by noting details of clients' habits, preferences, and behaviours towards services.</li> </ul>	<ul style="list-style-type: none"> <li>• To enter agreements with Clients and administer said contract.</li> <li>• To issue invoices to debtors.</li> <li>• To collect arrear payments from debtors.</li> <li>• To create and administer clients' online accounts.</li> <li>• To process payments and to prevent fraudulent transactions.</li> <li>• To respond to clients' queries.</li> <li>• To discharge iMeds contractual and statutory obligations.</li> <li>• To send requests for feedback and surveys to clients and carry out market research, so that iMeds can improve its services and assess clients' satisfaction.</li> <li>• To create a client profile, to help personalise services and iMeds' marketing communication to clients.</li> <li>• To protect or enforce iMeds legal rights, for example defending iMeds in the case of legal disputes.</li> <li>• To protect iMeds business and clients' accounts from fraud and other illegal activities.</li> <li>• To protect or enforce iMeds legal rights, for example defending iMeds in the case of legal disputes.</li> <li>• To process clients' requests relating to their Personal Information, pursuant to the POPI Act.</li> </ul>
CONTRACTORS & SERVICE PROVIDERS	<ul style="list-style-type: none"> <li>• Name, contact details, place of business address, postal address, and service history.</li> <li>• Identification Documents of natural persons.</li> <li>• Certificate of registration/incorporation for juristic persons. Certificate of name change, where applicable.</li> <li>• Board resolution to confirm designation of authority to signatory of juristic person.</li> <li>• VAT and income tax registration numbers and certificates.</li> <li>• B-BBEE rating certificate and audit report.</li> <li>• Public liability insurance policy number and certificate.</li> </ul>	<ul style="list-style-type: none"> <li>• To enter agreements with contractors / service providers and administer said agreements.</li> <li>• To verify the B-BBEE credentials of contractors / service providers, pursuant to the B-BBEE Act.</li> <li>• To determine the ability and suitability of contractors / service providers to provide the goods and services required by iMeds.</li> <li>• To order/request goods and services.</li> <li>• To settle invoices / accounts.</li> <li>• To conduct vetting / screening of contractors and service providers (i.e., background and qualifications).</li> <li>• To discharge iMeds' contractual and statutory obligations.</li> </ul>

	<ul style="list-style-type: none"> <li>• Professional indemnity insurance policy number and certificate.</li> <li>• Details of other insurance policies, where applicable.</li> <li>• Workman's Compensation registration number and letter of good standing, pursuant to the COIDA.</li> <li>• Bank account details and confirmation letter.</li> <li>• Audited financial statements.</li> <li>• Professional body affiliations and membership numbers.</li> <li>• Reports from vetting agencies on background and security screening of contractors / service providers.</li> <li>• Any other information provided to iMeds on voluntary basis, such as <i>inter alia</i> the contact detail of trade referees.</li> <li>• Personal Information collected via iMeds access control systems.</li> <li>• Video footage on which the Data Subject appears, that has been recorded, processed, and stored via camera surveillance systems.</li> <li>• Special Personal Information under certain circumstances (i.e., biometric information).</li> </ul>	<ul style="list-style-type: none"> <li>• To protect or enforce iMeds legal rights, for example defending iMeds in the case of legal disputes.</li> <li>• To maintaining a safe and secure workplace for Employees and Contractors, through access control and CCTV surveillance systems.</li> <li>• To process contractors' / service providers' request relating to their Personal Information, pursuant to the POPI Act.</li> </ul>
EMPLOYEES	<ul style="list-style-type: none"> <li>• Full names, national identification, and passport/work permit numbers (where applicable).</li> <li>• Demographic information, such as <i>inter alia</i> age, gender, and race.</li> <li>• Full names, national identification numbers, passport numbers (where applicable) and demographic information of spouse and child/ren (if any).</li> <li>• Contact details such as email address, telephone number, postal and residential address.</li> <li>• Information on the health condition and history of the Data Subject and his/her spouse and child/ren (if any).</li> <li>• Full names and contact details of next of kin.</li> <li>• Full names, contact detail, national identification, and passport numbers (where applicable) of beneficiary/ies.</li> <li>• Information on educational, financial/credit or employment record.</li> <li>• Academic transcripts and qualification certificates.</li> </ul>	<ul style="list-style-type: none"> <li>• To enter and administer employment agreements.</li> <li>• To appoint Directors, pursuant to the Companies Act.</li> <li>• To check whether the Data Subject is legally entitled to work in South Africa.</li> <li>• To pay salaries, withhold income tax and submit returns to SARS, timeously and accurately.</li> <li>• To deduct UIF and any other statutory benefit contributions from salaries and make payment to SARS, timeously and accurately.</li> <li>• To enrol employees in a Medical Aid, Provident Fund, and other employee benefit schemes, where applicable.</li> <li>• To liaise with the trustees of the Medical Aid, Provident Fund, and any providers of employee benefits, where applicable.</li> <li>• To comply with health &amp; safety regulations, pursuant to relevant legislation.</li> </ul>





	<ul style="list-style-type: none"> <li>• Disclosure of directorships and/or interests.</li> <li>• Details relating to financial standing/resources.</li> <li>• Bank account details.</li> <li>• Income tax number.</li> <li>• Personal Information collected via automated monitoring of the Website and other technical systems, such as its computer networks and connections, CCTV systems, access control systems, communications systems, and remote access systems.</li> <li>• Above-mentioned includes video footage on which the Data Subject appears, that has been recorded, processed, and stored via camera surveillance systems.</li> <li>• Personal Information collected via iMeds' email and instant messaging systems, intranet and internet facilities, telephone, mobile phones, voicemail and records thereof obtained from service providers.</li> <li>• Special Personal Information under certain circumstances (i.e., criminal record, biometric information, health information, trade union membership, race, and ethnicity).</li> <li>• Such other Personal Information as iMeds may require for purposes of background, security, and health screening.</li> <li>• Reports from vetting agencies on the background and security screening of the Data Subject.</li> <li>• Reports from medical practitioners on the health screening of the Data Subject.</li> </ul>	<ul style="list-style-type: none"> <li>• To conduct investigations into the causes of incapacity, occupational injuries or diseases.</li> <li>• To conduct investigations when iMeds has reason to believe that employees committed misconduct and/or a crime.</li> <li>• To prevent fraud and other crimes in the workplace.</li> <li>• To monitor employees' use of iMeds's information and communication systems to ensure compliance with iMeds's IT policies.</li> <li>• To ensure network and information security, including preventing unauthorised access to iMeds' computer and electronic communications systems and preventing malicious software distribution.</li> <li>• To comply with laws and other measures designed to protect or advance persons, or categories of persons, disadvantaged by unfair discrimination.</li> <li>• To conduct business management and planning, including accounting and auditing.</li> <li>• To manage employees and their performance to meet iMeds' business objectives.</li> <li>• To making decisions about employees' continued employment or engagement.</li> <li>• To make decisions about training, promotion, succession and career development of employees.</li> <li>• To monitor the treatment and recovery of employees who are incapacitated due to ill health and/or suffered occupational injuries or diseases.</li> <li>• To reintegrate and/or support employees entitled to benefits in rework incapacity.</li> <li>• To maintain records and manage employees' sick leave and ascertaining their fitness to work.</li> <li>• To conduct background and security screening of the Data Subject.</li> <li>• To verify whether the Data Subject is suitable for employment or continued employment.</li> <li>• To deal with legal disputes involving Data Subjects, including claims for</li> </ul>
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		<p>occupational injuries and diseases pursuant to relevant legislation.</p> <ul style="list-style-type: none"> <li>To protect or enforce iMeds's legal rights, for example defending iMeds in the case of legal disputes.</li> <li>To process a request of the Data Subject relating his/her Personal Information, pursuant to the POPI Act.</li> </ul>
JOB APPLICANTS	<ul style="list-style-type: none"> <li>Full names, national identification and passport/ work permit numbers (where applicable).</li> <li>Contact details such as email address, telephone, postal and residential address.</li> <li>Reports from vetting agencies on background and security screening of job applicants.</li> <li>Reports from vetting agencies the verification of job applicants' educational record, academic transcripts and qualifications.</li> <li>Curriculum vitae, including educational and employment record.</li> <li>Such other Personal Information as iMeds may require for purposes of background, security and health screening.</li> <li>Special Personal Information under certain circumstances (i.e., criminal record, biometric information, health information, race and ethnicity).</li> <li>Any other information provided to iMeds on a voluntary basis, such as inter alia the name and contact detail of referees.</li> </ul>	<ul style="list-style-type: none"> <li>To interview and evaluating job applicants and assess their ability and suitability to be employed by iMeds in certain job roles.</li> <li>To check whether the Data Subject is legally entitled to work in South Africa.</li> <li>To comply with laws and other measures designed to protect or advance persons, or categories of persons, disadvantaged by unfair discrimination.</li> <li>To conduct background, security and health screening of job applicants.</li> <li>To process a request of the Data Subject relating his/her Personal Information, pursuant to the POPI Act.</li> <li>To protect or enforce iMeds' legal rights, for example defending iMeds in the case of legal disputes.</li> </ul>
WEBSITE USERS	<ul style="list-style-type: none"> <li>Information collected through cookies and similar technologies (i.e. the type of web browser or mobile device, operating system, IP address, the URL of the landing page, the referring website, the time and date of visiting the Website and the search terms used).</li> </ul>	<ul style="list-style-type: none"> <li>To deliver relevant content to the Website/s and to measure and understand the effectiveness of the content iMeds serves to its clients.</li> <li>To administer and protect the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data).</li> <li>To use data analytics to improve the Website, content, marketing, and user experience.</li> </ul>
CLIENT'S DATA SUBJECTS	<ul style="list-style-type: none"> <li>Name and residential address.</li> <li>Contact details such as email address and telephone number.</li> <li>Health and medical history information.</li> </ul>	<ul style="list-style-type: none"> <li>To discharge iMeds contractual obligations under its agreements with clients.</li> <li>To schedule appointments and conduct insurance medical examinations.</li> </ul>