

SOUTH AFRICAN ORTHOTIC & PROSTHETIC ASSOCIATION

PRIVACY POLICY

1. INTRODUCTION

The South African Orthotic & Prosthetic Association (hereafter "SAOPA") respects your privacy and your personal information. This Privacy Policy together with the SAOPA PAIA Manual aims to let you know how the SAOPA will treat any personal information that it may have about you and how you can access such personal information held. The SAOPA will take all reasonable measures, in accordance with this Policy, to protect your personal information and to keep it confidential.

2. DEFINITION OF PERSONAL INFORMATION

Personal information is "personal information" as defined in terms of section 1 of the Protection of Personal Information Act 4 of 2013 ("POPIA"). This is information relating to an identifiable, living natural person or existing juristic person. Please refer to POPIA for a detailed definition and various types or categories of personal information.

3. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION COLLECTED

The SAOPA only collects general personal information (some of which may be publicly available) and aims to only collect that personal information which is necessary for it to carry out its Services and other facilities provided to you. The SAOPA collects the following categories of personal information:

- a. Member – such as name, identity number, contact details, email, physical and postal addresses, company details, designations, professional experience, HPCSA registration and qualifications. Member profiles provide for other information to be provided but this is voluntary information that can be provided at the discretion of the member.
- b. Alumni (Training and Event Delegates and past Corporate Clients) – such as name, contact details, email, physical and postal addresses, company details and documents (where necessary), dietary requirements, and allergies. With regards to Corporate Services company documents required for services and specifically in director's personal opinions on the performance of the board are collected and stored for the purposes of reporting.

Further information may be requested by the SAOPA depending on the Service being provided or for statistical or healthy and safety reasons.

- c. NEC Designations – same information as per Members above including records of results and decisions.
- d. Suppliers/Procurement – such as company name, address and contact details, banking details, VAT number and BEE certificate/level information.
- e. Website: - website user (ie. non-member and public) name and contact details for access to specific SAOPA content/services not freely available to the general public, but on request by the user through website enquiry.

f. Employees – all applicable employee information required to be kept from a labour law perspective and running of the organisation. Such information relates to internal employees and not external clients. Furthermore, external parties (unless with applicable court orders or legal reasons) shall not have access to such Employee Information.

4. HOW PERSONAL INFORMATION IS COLLECTED

Your personal information is obtained directly from you either via online forms on our website, email communications, requests for proposals, hard copy forms submitted to the SAOPA (such as training facilitator accreditation forms); and on occasion telephonically (only under specific circumstances and at your request). In instances where Corporate Clients require services, the Corporate Client representative may provide individual director information to the SAOPA. It is the responsibility of the Corporate Client to ensure it has consent from such individuals to share their general personal contact information.

5. PURPOSE FOR COLLECTING PERSONAL INFORMATION

The SAOPA collects personal information for the following purposes:

- a. To provide you with services offered and requested.
- b. To understand your specific needs and requirements, and in order to improve the SAOPA member benefit, service and value offering.
- c. To provide you with SAOPA communications in relation to the services being rendered, and keeping you informed of governance related updates.
- d. To provide you with SAOPA related marketing material due to your past interaction and use of the SAOPA services.
- e. To ensure payment to suppliers for services procured.
- f. For health and safety purposes.
- g. For statistical, historical and/or reporting purposes.

The SAOPA will always ask for your permission before it uses your personal information for any purpose not disclosed above or unrelated to the operations/services of the SAOPA and its use in the ordinary course of business.

6. RECIPIENTS OF PERSONAL INFORMATION

The Personal information collected is used only by the SAOPA and its employees in the rendering of its organisational purpose and services. Only in instances where the sharing of personal information to recipients outside of the SAOPA is necessary in order to fulfil a SAOPA obligation or service will such information be provided.

7. PERSONAL INFORMATION SHARED TO THIRD PARTIES

As part of the Member Benefits provided to SAOPA Members, the SAOPA may be required to provide third party service providers with minimal Member personal information (such as for example: name, membership number, contact details) in order to provide such Member Benefits. Personal information provided to third party service providers for such purposes, will be limited to only that information which is absolutely necessary in order for the

member to enjoy such benefit which he/she is entitled to. No further information will be provided and third party service providers are prohibited from using Member details for any other purpose other than providing the Member Benefit or for statistical and historical purposes.

Your privacy is important to us. The SAOPA will therefore not sell, rent nor provide your personal information to unauthorised entities or to third parties for their independent use without your consent. The SAOPA will release your personal information to a party if it believes that SAOPA is required by law or by a court or statutory body to do so. The SAOPA will also disclose your personal information if the SAOPA believes that it is necessary to prevent or lessen any unlawful or harmful actions and to protect and defend legitimate business interests, rights or property of the SAOPA.

8. PROTECTION OF PERSONAL INFORMATION

The SAOPA values the information that you choose to provide to us and will therefore take reasonable steps to protect your personal information from loss, misuse or unauthorised alteration. The SAOPA conducts regular security testing of its servers and ensures that its employees are trained around protection of personal information to ensure that your personal information is used correctly and protected.

When you use the services or facilities provided by the SAOPA, you may be given an access number, username, password and/or personal identification number ("PIN"). You must always keep your username, password and/or PIN a secret and ensure that you do not disclose it to anyone. The SAOPA shall not be held responsible for personal information accessed as a result of you providing someone your SAOPA profile username and password.

Upon your request the SAOPA will provide you with its records of the personal information you provided to us. For security reasons, this information will only be sent to the e-mail address on file for the subscriber username and password associated with it.

If you wish to object to the SAOPA processing your personal information, kindly complete Form 1 (Annexure A) in terms of POPIA and send same to the Information Officer at the SAOPA or to info@saopa.co.za. Objecting to the processing of your personal information, may result in services being stopped, access or implementation issues and/or other service inefficiencies and communications.

9. STORAGE OF PERSONAL INFORMATION AND RETENTION THEREOF

Personal information is stored on the SAOPA's servers located onsite and in the cloud (which in this case may be hosted outside of South Africa, see Clause 10 below) which is accessed by SAOPA internal employees only. Personal information will only be retained for so long as necessary to carry out the function, Services required and/or for historical and statistical use by the SAOPA.

Personal Information no longer required for the purposes of rendering services to you or after completion of services, will be destroyed. The SAOPA undertakes to ensure that personal information shall not be stored for longer than 5 years, unless required to do so by law or other regulatory obligations and/or for historical record purposes. The SAOPA however may maintain de-identified information for statistical purposes.

Note: Membership records, Service Agreements, training attendance records, reports or deliverables provided to Corporate Clients in terms of specific scope of work and personal information related thereto shall be kept for the

SAOPA indefinitely. The purpose of which is to ensure a continuous and accurate record of your membership, training history and reports/advice provided by the SAOPA.

10. TRANS-BORDER FLOW OF PERSONAL INFORMATION

Your personal information may be stored on servers located outside of South Africa due to the SAOPA's Member Management System. The SAOPA however undertakes to ensure that service providers used for such cloud servers and/or services are obliged to comply with the highest standards of data protection to ensure the security of your personal information.

11. LINKS ON SAOPA WEBSITE OR EMAIL COMMUNICATIONS

The SAOPA is not responsible for the content or the privacy policies of websites of other institutions to which it may link you to – mainly for information purposes and access to documents provided by such institutions. The use of other third party websites and content is at your sole discretion. This Policy applies solely to information collected by the SAOPA.

The SAOPA is not responsible for any representations or information or warranties or content on any website of any third party (including websites linked to the SAOPA website). The SAOPA does not exercise control over third parties' privacy policies and you should refer to the privacy policy of any third party to see how such party protects your privacy.

12. PERSONAL INFORMATION HELD BY OR DISCLOSED BY YOU TO THIRD PARTIES

If you disclose any personal information to a third party, such as one of our business partners or anyone other than the SAOPA, you must be aware that the SAOPA does not regulate or control how that third party uses your personal information. You should always ensure that you read the privacy policy of any third party.

13. CORRECTION OF PERSONAL INFORMATION

It is your responsibility to ensure that the personal information provided to the SAOPA is true, correct and accurate at all times. You may update and correct your personal information at any time either yourself via your online SAOPA profile, via email communications to the SAOPA (kindly contact info@saopa.co.za), telephonically by calling either the SAOPA information or the SAOPA Chief Operating Officer or through completing and sending Form 2 (Annexure A) in terms of POPIA to the Information Officer at the SAOPA or to info@saopa.co.za. The SAOPA does not vet or check the information provided to it, and thus will not be held responsible for any incorrect or outdated information it may and which may be used to provide you with relevant and important communications.

If you would like your Personal Information deleted by the SAOPA, kindly also use Form 2 (Annexure B) and send same to the Information Officer at the SAOPA or to info@saopa.co.za. Deleting your Personal Information may impact the services being used, offered or access there to.

14. ACCESS TO PERSONAL INFORMATION HELD BY THE SAOPA

See the SAOPA PAIA Manual for detailed information around your rights to access information held by the SAOPA and applicable steps to follow.

15. CHANGES TO THIS POLICY

The SAOPA may change this Policy at any time. The most current version of this Policy will be displayed on the SAOPA website. If you use this website or any of the services or facilities offered by the SAOPA after the SAOPA has displayed a change to this Policy, you will be deemed to have read and agreed to the change.

16. APPLICABLE LAWS

This Policy will be governed by the laws of the Republic of South Africa. Specifically, the SAOPA undertakes to comply with the provisions of POPIA and the Promotion of Access to Information Act No.2 of 2000 ("PAIA").

In so far as the SAOPA collects and uses personal information relating to European Citizens (who may elect to be SAOPA Members), the SAOPA undertakes to uphold and comply with the data protection obligations in terms of the General Data Protection Regulation (GDPR) (EU) 2016/679 so far as it applies to the SAOPA and in a proportionally manner based on the type and amount of information held. For more information on the GDPR see The European Commission website.

17. JURISDICTION

You consent to the jurisdiction of the South African courts for any dispute which may arise out of this privacy policy.

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