

Privacy Policy

Introduction

Welcome to Centre for Diabetes & Endocrinology (Pty) Ltd.

The Centre for Diabetes and Endocrinology (Pty) Ltd (CDE), is a Private Registered Managed Care Organisation registered within the borders of South Africa, and with a 26-year history in the provision of comprehensive, person-centred and evidence-based diabetes care.

Our Terms and Conditions (**'Terms'**) govern all use of our Service and together with the Privacy Policy constitutes your agreement with us (**'agreement'**).

The Centre for Diabetes & Endocrinology (Pty) Ltd services, including (without limitation) our website and other interactive properties through which the services are delivered (collectively, the 'service'), are owned, operated and distributed by The Centre for Diabetes & Endocrinology (Pty) Ltd (referred to in this Privacy Notice as 'The CDE' or 'we' and through similar words such as 'us', 'our', etc.). This Privacy Notice outlines the personal information that the CDE may collect, how CDE uses and safeguards that information, and with whom and for what purpose/s we may share it.

The CDE encourages our customers, visitors, business associates, and other interested parties to read this Privacy Notice, available in the public domain at www.CDEDiabetes.co.za/PrivacyPolicy, which applies to all users of our service.

By accessing or using any part of our Service, or by submitting personal information to The CDE by any means, you acknowledge that you:

- understand and agree to be bound by this Privacy Notice,
- agree that The CDE process, transfer, use, and disclose (where applicable) your personal information as described in this Notice.
- agree to THE TERMS AND CONDITIONS OF OUR SERVICE (the 'Terms of Service').

IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY NOTICE OR OUR TERMS OF SERVICE, PLEASE DO NOT USE ANY OF THE SERVICES.

Definitions

SERVICE means the CDE website operated by The CDE

PERSONAL DATA means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

USAGE DATA is data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).

COOKIES are small files stored on your device (computer or mobile device).

DATA CONTROLLER means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your data.

DATA PROCESSORS (OR SERVICE PROVIDERS) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers to process your data more effectively.

DATA SUBJECT is any living individual who is the subject of Personal Data.

THE USER is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

What personal information do we collect about you?

Personal information (also commonly known as personally identifiable information (PI, or personal data) is information that can be used to identify you, or any other individual to whom the information may relate.

The personal information that we collect directly from those registering for the Service, includes the following categories:

- Name and contact information (e.g. address; phone number; email, fax);
- Billing Information (e.g. credit card, bank account, billing contact information)
- Order Information (e.g. current order/purchase information, purchase history, shipping details).
- Travel Information (e.g. booking numbers, passport information, flight numbers, travel details)
- Company/employer information
- Geographic or location information
- Information contained in posts you made on the public forums and interactive features of the Service.
- Other information that may be exchanged in the course of engaging with the Service. You will be aware of any subsequently collected information because it will come directly from you.

Other Data

While using our Service, we may also collect the following information: sex, age, date of birth, place of birth, passport details, citizenship, registration at place of residence and actual address, telephone number (work, mobile), details of documents on education, qualification, professional training, employment agreements, non-disclosure agreements, information on bonuses and compensation, information on marital status, family members, social security (or other taxpayer identification) number, office location and other data.

Collection of User Generated Content

We may invite you to post content on the Service, including your comments and any other information that you would like to be available on the Service, which may become public ('User Generated Content'). If you post User Generated Content, all of the information that you post will be available to authorised personnel

of The CDE. You expressly acknowledge and agree that we may access in real-time, record and store archives of any User Generated Content on our servers to make use of them in connection with the Service. If you submit a review, recommendation, endorsement, or other User Generated Content through the Service, or through other websites including Facebook, Instagram, Google, LinkedIn, and other similar channels, we may share that review, recommendation, endorsement or content publicly on the Service.

What are the sources of personal information collected by The CDE?

When providing personal information to The CDE as described in this Notice, that personal information is collected directly from you, and you will know the precise personal information being collected by us. The CDE does not collect personal information from any other sources, except where it may automatically be collected as described in the section titled 'Cookies, Device Data, and How it is Used', if the information in that section is considered personal information.

Why does The CDE collect your personal information?

Subject to the terms of this Privacy Notice, The CDE uses the above described categories of personal information in several ways. Unless otherwise stated specifically, the above information may be used for any of the following purposes:

- to administer the Service to you;
- to respond to your requests;
- to distribute communications relevant to your use of the Service, such as system updates or information about your use of the Service;
- as may be necessary to support the operation of the Service, such as for billing, account maintenance, and record-keeping purposes;
- to send to you CDE newsletters, product announcements, marketing or promotional materials and other information that we feel may be of interest to you. Please note that you may 'opt out' of receiving any, or all of these marketing materials
- in other manners after subsequent notice is provided to you and/or your consent is obtained, if necessary.

How do we share your Personal Information with third parties?

We may provide any of the described categories of personal information to CDE employees, consultants, affiliates or other businesses or persons for the purpose of processing such information on our behalf in order to provide the Service to you. In such circumstances, we require that these parties agree to protect the confidentiality of such information consistent with the terms of this Privacy Notice and applicable privacy laws.

We will not share your personal information with other, third-party companies for their commercial or marketing use without your consent or except as part of a specific programme or feature which you will specifically be able to opt-out of.

In addition, we may share personal information:

1. to the extent we have a good-faith belief that such action is necessary to comply with any applicable law;
2. to enforce any provision of the Terms of Service, protect ourselves against any liability, defend ourselves against any claims, protect the rights, property and personal safety of any user, or protect the public welfare;
3. when disclosure is required to maintain the security and integrity of the Service, or to protect any user's security or the security of other persons, consistent with applicable laws
4. to respond to a court order, subpoena, search warrant, or other legal process, to the extent permitted and as restricted by law; or
5. in the event that we or any of our subsidiaries go through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of our assets, your Personal Data may be transferred to assure business continuity and uninterrupted service to you.

We may also disclose your information also:

6. to our subsidiaries and affiliates;
7. to contractors, service providers, and other third parties we use to support our business;
8. to fulfil the purpose for which you provide it;
9. for the purpose of including your company's logo on our website;
10. for any other purpose disclosed by us when you provide the information;
11. with your consent in any other cases;
12. if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

Direct Marketing Communications

We may communicate with you using email, SMS, and other channels (sometimes through automated means) as part of our effort to market our products or services, administer or improve our products or services, or for other reasons stated in this Privacy Notice. You have an opportunity to withdraw consent to receive such direct marketing communications, as permitted by law.

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by submitting a request by using the UNSUBSCRIBE link in any email communication you may have received. Further, you may express your communication preferences by:

- Noting your preferences at the time you register your account with the Site [or our mobile application];
- Logging into your account settings and updating your preferences;
- Contacting us using the contact information provided below

Please note that you may continue to receive non-marketing communications as may be required to maintain your relationship with the CDE.

In addition to the communication described here, you may receive third-party marketing communications from providers we have engaged to market or promote our products and services. These third-party providers may be using communications lists they have acquired on their own, and you may have opted-in to those lists through other channels. If you no longer wish to receive emails, SMSs, or other communications from such third parties, you may need to contact that third party directly.

Retention of Data

The CDE will retain your personal information only for as long as is necessary for the purposes set out in this Notice. We will retain and use personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

The CDE will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Sites and/or Portals, or we are legally obligated to retain this data for longer periods.

The CDE will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

Location Data

We may use and store information about your location if you give us permission to do so ('Location Data'). We use this data to provide features of our Service, to improve and customise our Service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

We may also collect information regarding application-level events, such as crashes, and associate that temporarily with your account to provide customer service. In some circumstances, we may combine this information with personal information collected from you (and third-party service providers may do so on our behalf).

In addition, we may use 'cookies', clear gifs, and log file information that help us determine the type of content and pages to which you link, the length of time you spend at any particular area of the Service, and the portion of the Service you choose to use.

A cookie is a small text file that is sent by a website to your computer or mobile device where it is stored by your web browser. A cookie contains limited information, usually a unique identifier and the name of the site. Your browser has options to accept, reject or provide you with notice when a cookie is sent. Our cookies can only be read by CDE; they do not execute any code or virus; and they do not contain any personal information. Cookies allow the CDE to serve you better and more efficiently, and to personalise your experience with the Service. We may use cookies for many purposes, including (without limitation) to save your password so you don't have to re-enter it each time you visit the Service, and to deliver content (which may include third party advertisements) specific to your interests.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

1. **Session Cookies:** We use Session Cookies to operate our Service.
2. **Preference Cookies:** We use Preference Cookies to remember your preferences and various settings.
3. **Security Cookies:** We use Security Cookies for security purposes.

4. **Advertising Cookies:** Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

We may use third party service providers to help us analyse certain online activities. For example, these service providers may help us measure the performance of our online campaigns or analyse visitor activity on the Service. We may permit these service providers to use cookies and other technologies to perform these services for the CDE. We do not share any personal information about our customers with these third-party service providers, and these service providers do not collect such personal information on our behalf. Our third-party service providers are required to comply fully with this Privacy Notice.

We may use third party service providers to help us deliver certain services, and it may result in the processing of personal information in data centres and locations outside of the Republic of South Africa. For example, these service providers may provide us with essential information technology or tools we use to run our business. We may permit these service providers to process our business information and/or your personal information. We do not permit these service providers to process any personal information outside of a contract, and these service providers may collect personal information on our behalf. Our third-party service providers are required to comply fully with this Privacy Notice.

Payments

We may provide paid products and/or services within Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

Our Policy on 'Do Not Track' Signals:

We honour 'Do Not Track' signals and do not track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

South African Privacy Rights

If you are a South African resident, South Africa law may provide you with certain rights with regard to your personal information under the Protection of Personal Information Act ('POPIA') and Promotion of Access to Information Act ('PAIA').as well the Consumer Protection Act Throughout this Privacy Notice you will find information required by POPIA regarding the categories of personal information collected from you; the purposes for which we use personal information, and the categories of third parties your data may be shared with. This information is current as of the date of the Notice and is applicable in the 12 months preceding the effective date of the Notice.

As a South African resident, the POPIA and PAIA provide you the ability to make inquiries regarding to your personal information. Specifically, the degree to which the information is not already provided in this Privacy Notice, you have the right to consent to your personal information, including:

- The specific pieces of personal information collected about you.
- The ability to correct or delete certain personal information collected about you.
- The ability to delete all the personal information collected about you, subject to certain exceptions.
- To opt-in or opt-out of direct marketing to you.
- To object to processing of your personal information, or
- Appeal any rejection of access to your personal information

You may submit a request regarding your rights under POPIA or PAIA by submitting a request by contacting us at Compliance@cdediabetes.co.za

If we receive a POPIA request from you, we will first make a determination regarding the applicability of the law, and we will then take steps to verify your identity prior to responding. The steps to verify your identity may vary based on our relationship with you, but, at a minimum, it will take the form of confirming and matching the information submitted in the request with information already held by CDE and/or contacting you through previously used channels to confirm that you submitted the request (i.e. confirming identity through contact information that we have on file, and/or the contact information submitted to make the request).

The CDE does not knowingly collect or process the special personal information such as your religious or philosophical beliefs, race or ethnic origins, trade union memberships, political persuasion, or your criminal behaviour or biometric information.

If you have a comment, question, or complaint about how we are processing your personal information, please contact us at Compliance@CDEDiabetes.co.za to allow us to resolve the matter. In addition, if you are located in the Republic of South Africa, you may submit a complaint regarding the processing of your personal information to the Information Regulator via the following link:
<https://www.justice.gov.za/infoereg/contact.html>.

Your Data Protection Rights under the South African Protection of Personal Information Act 2013 (POPI)

According to the POPI Act of 2013 we agree to the following:

1. users can visit our site anonymously;
2. our Privacy Policy link includes the word 'Privacy', and can easily be found on the home page of our website;
3. users will be notified of any privacy policy changes on our Privacy Policy Page;
4. users are able to change their personal information by emailing us at Compliance@CDEDiabetes.co.za

Third Party Advertisers

We may allow other companies, called third-party ad servers or ad networks, to serve advertisements within the Service. These third-party ad servers or ad networks use technology to send, directly to your

device, the advertisements and links that appear on the Service. They automatically receive your device ID and IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalise the advertising content you see. You should consult the respective privacy policies of these third-party ad servers or ad networks for more information on their practices and for instructions on how to opt-out of certain practices. This Privacy Notice does not apply to them, and we cannot control their activities.

Information Storage and Security

We employ industry-standard and/or generally accepted security measures designed to secure the integrity and confidentiality of all information submitted through the Service. However, the security of information transmitted through the internet or via a mobile device can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data.

Users of the Service are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of the Service. To protect you and your information, we may suspend your use of any of the Service, without notice, pending an investigation, if any breach of security is suspected.

External Links

The Service may contain links to other websites maintained by third parties. Please be aware that we exercise no control over linked sites and The CDE is not responsible for the privacy practices or the content of such sites. Each linked site maintains its own independent privacy and data collection policies and procedures, and you are encouraged to view the privacy policies of these other sites before providing any personal information.

You hereby acknowledge and agree that The CDE is not responsible for the privacy practices, data collection policies and procedures, or the content of such third-party sites, and you hereby release The CDE from any and all claims arising out of or related to the privacy practices, data collection policies and procedures, and/or the content of such third-party sites.

Children's Privacy

The Service is not intended for children under the age of 18, and CDE does not knowingly collect the personal information of children under the age of 18.

Changes to this Privacy Notice

The CDE reserves the right to modify this Privacy Notice from time to time in order that it accurately reflects the regulatory environment and our data collection principles. When material changes are made to this Privacy Notice, The CDE will post the revised Notice on our website. This Privacy Notice was last modified as of **31 May 2021**

Contact Us

If you have any questions or comments about this Privacy Notice or the Service provided by The Centre for Diabetes and Endocrinology (Pty) Ltd please contact us at Compliance@CDEDiabetes.co.za