

DENOVO MEDICA PRIVACY NOTICE

We value your privacy and we want you to understand how we collect data through our website, how we use that data, and how we disclose it.

This notice is about what kind of personal information we collect, how we use and store it, how we protect it, and what rights you have in terms of your personal information.

If you have any questions, please contact info@denovomedica.com

1. WHAT THIS PRIVACY NOTICE IS ABOUT

Who does this privacy notice apply to?

This notice applies to all users of the deNovo Medica website. In terms of the Protection of Personal Information Act ('POPIA'), you are the data subject.

Who are you sharing your information with?

You are sharing your information with deNovo Medica.

Our registered address is:

70 Arlington Rd,

Everglen,

Cape Town,

7550

In terms of POPIA, we are the responsible party.

This privacy notice is part of our agreement with you.

This privacy notice forms part of our agreement with you. You should read it together with the terms and conditions applicable to your relationship with us.

What kind of information we collect and how we use it.

As your accredited digital CPD platform for healthcare services of choice, deNovo Medica collects, uses and retains your personal information.

In most circumstances, the personal information we collect from you is mandatory. This means that we must collect it

to comply with the law or because we need it to provide our products and services to you.

When we collect personal information from you that is not mandatory, we always have a specific purpose for collecting that information.

If you choose not to provide us with the personal information we need, it will limit our ability to provide our products and services to you. For example, if you do not provide us with your MP/HPCSA/P-number, we will not be able to link the CPD points you have obtained through us to your specific registered healthcare professional record.

We may update this notice from time to time.

We may have to change this privacy notice to accommodate changes in our business or changes to the law from time to time.

2. WHAT INFORMATION WE COLLECT

The type of services we provide you with will determine the type of information we collect about you.

The type of information we collect and share depends on the nature of the products and services we provide to you and any legal requirements.

We will collect information directly from you or third party sources, for example, by performing a background check with a registered credit bureau.

Most of the time we will collect your information directly from you. However, sometimes we will also collect information from other sources such as public records, publicly available information, or media sources.

We also sometimes use external companies to assist us with generating new leads or recruiting new users.

Sometimes, we collect your information from companies such as [MedPages](#) for lead generation purposes. You can find their [privacy notice](#) here.

We may collect information about you from third party sources under the following circumstances:

- With your consent;
- If we need the information to comply with an obligation imposed by law;
- If you deliberately made the personal information public;
- If collecting the information from a third party source is necessary for maintaining our legitimate interests; and
- If collecting the information directly from you would prejudice a lawful purpose of the collection (e.g. if we need to verify information about you in a background check).

Here is a list of the personal information that we collect about you.

Directly from you, we collect:

- your name
- contact details (email, cellphone no. and area you live)
- what type of healthcare professional you are
- your MP/HPCSA/P-number

Most of the time we collect your information directly from you. However, sometimes we collect your personal information using cookies.

When you use our website, we collect certain information automatically by using cookies, including:

- your device operating system
- access time
- other device data
- advertisements and other areas of the website you clicked on
- your location
- your IP address

We also generate information about you in the form of records.

We generate records of:

- the courses you have attended to obtain CPD points
- your CPD points obtained through courses offered through deNovo Medica
- your communication with us.

3. WHY WE COLLECT AND PROCESS YOUR PERSONAL INFORMATION

3.1. We process your personal information to conclude a contract with you and to meet our contractual obligations.

We need your personal information to manage our relationship with you and run our business.

Personal information is essential throughout the user journey. We use your personal information:

- to identify you;
- to verify your identity;
- to create a user account for you;
- to register you for a course or webinar we are offering; and
- when our external online event service provider confirms your completion of a particular course or webinar, so we can allocate you the relevant CPD points; and
- to send you your course completion certificate and allocate the relevant CPD points once you have attended a particular course or webinar.

3.2. We process your personal information because it is in your or our legitimate interest to do so, because we are legally required to do so, or because you have given us permission.

We process some personal information because it is in your legitimate interest to do so.

When you contact us via our website, email, or telephone, we use the information we collect to reply to, investigate, and resolve your query, complaint, or request.

We process some personal information because it is in our legitimate interest to do so.

When we collect and process your personal information using third party cookies.

When we collect and process your personal information from third party sources for our direct marketing purposes.

When we undertake research and statistical processes. The research and statistics we get from this process do not include your Personal Information and cannot be linked to you, nor can you be identified from these statistics.

We are legally required to process some personal information.

We will collect, use, and retain your personal information to ensure that we comply with income tax, financial reporting laws, and other legislation. We may use your personal information for:

- financial and tax reporting purposes;
- the detection and prevention of fraud, crime, or other malpractice; and
- any legal proceedings.

Here are some of the pieces of legislation which have an effect on why your personal information is collected, used and retained:

- Income Tax Act 58 of 1962
- Companies Act 71 of 2008
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002

We process some personal information with your consent.

When you register you subscribe to our newsletter, which is sent to you by email. You can unsubscribe at any time by following the unsubscribe link at the bottom of the email or by contacting us directly.

4. HOW WE USE COOKIES

We use cookies to collect information for our website to function optimally.

We use first-party and third-party cookies.

First-party cookies are cookies that we put on your device directly.

Third-party cookies are cookies that our service providers place on your device when you visit our website. We use these service providers to analyse how you use our website and to detect malicious visitors.

We use cookies that are essential for our website.

These cookies are essential for the normal functioning of our website and for you to use its features, such as accessing secure areas of the site.

We use cookies to collect statistics and analyse how you use our website.

These cookies, which include cookies from third-party analytics services, collect information about how you use our website, such as the pages you visit and the links you click on. We cannot use this information to identify you as the information is anonymised. The sole purpose of these cookies is to improve the functionality of our website.

You may [opt out](#) of these cookies without affecting the functionality of our website.

We use cookies to store your preferences.

These cookies allow our website to remember choices you made in the past, such as your selected font size.

You may [opt out](#) of these cookies, but this will affect some functionality of our website.

We use cookies for marketing and advertising purposes.

These cookies track your online activity to help us deliver relevant advertising, or limit how many times you see an ad. These cookies can share information with other organisations or advertisers.

You may [opt out](#) of these cookies without affecting the functionality of our website.

You can manage cookies through your web browser.

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies.

You can find out how to do this by clicking 'help' on your browser's menu or by visiting www.allaboutcookies.org.

If you disable cookies, it may affect the functionality of our website.

These links will explain how to manage cookies for the most common browsers:

- [Microsoft Edge](#)
- [Google Chrome](#)
- [Firefox](#)
- [Safari](#)

We use Google Ads.

Google Ads is a tool that uses third party cookies to serve you with advertisements based on your visit to our website and other websites on the internet. These cookies enable Google and its third party vendors to serve you advertisements based on your visit to our websites and other websites on the internet.

We use Google Ads because we are interested in determining which of our advertisements are most effective in drawing users to our website, showing you the

advertisements you are interested in, and achieving a fair calculation of advertising costs.

Google shares their insights with us in an aggregated statistical format, so no individual website users are personally identified.

Please note: Although Google Ads collects your geographical location, device, internet browser and operating system, we cannot personally identify you with this information. However, Google Ads records your computer's IP address which could be used to identify you personally. We do not have access to this information. Google processes this information in accordance with the Google Privacy Policy. You can read about it [here](#).

You can opt out of receiving personalised ads from Google [here](#).

We use Google Analytics.

Google Analytics is a tracking tool that uses third party cookies to help us understand how you use our website, such as the time you visit, the pages you view, whether you have visited before and the website you visited before visiting ours. Google uses this information to evaluate your use of our website, compile reports on website activities, and provide us with other services associated with running our website.

Google shares their insights with us in an aggregated statistical format, so no individual website users are personally identified.

Please note: Although Google Analytics collects your geographical location, device, internet browser and operating system, we cannot personally identify you with this information. However, Google Analytics records your computer's IP address which could be used to identify you personally. We do not have access to this information. Google processes this information in accordance with the Google Privacy Policy. You can read about it [here](#).

Google Analytics offers a deactivation add-on for most current browsers that gives you more control over what data Google can collect on websites you access. You can find out how to deactivate Google Analytics [here](#).

5. HOW WE SHARE YOUR INFORMATION

We may share your personal information internally or with service providers to manage our business relationship with you and run our business day-to-day.

Here are some of the instances when we are required to share your information:

- sometimes we are required by legislation to share information with the government, regulatory bodies, law enforcement or a court,
- from time to time, parts of the business may be sold, which could include a transfer of customer information;
- we share your information with our external online event service providers when you register for an event they are running on our behalf;
- with Google for website analytics and advertisement remarketing purposes, as described in the 'How we use Cookies' section above;
- we may share your information for audit purposes (i.e. to verify that you have been awarded your CPD points through us); and
- we may share your information with companies who provide services on our behalf to do business (e.g. tax, IT, website maintenance, accountants, legal and other professional consultants).

We only share the minimum amount of your personal information.

We only share the minimum amount of personal information that the service provider requires.

We only share your personal information with service providers we trust.

We require that service providers agree to keep your personal information secure and confidential and only use it for the purposes for which we shared it with them.

Some of the service providers that we use may be in other countries.

When we share information with service providers in other countries that may not have the same levels of protection of personal information as South Africa, they must undertake to protect your personal information to the same level that we do.

We provide for appropriate safeguards before we share.

We have appropriate safeguards in place in contracts between our local and foreign service providers and us.

6. HOW WE STORE YOUR INFORMATION

We retain your personal information for as long as it is reasonably necessary.

We retain your personal information for as long as we have a legitimate reason to keep it. These periods vary depending on the type of personal information, the reason we originally collected it, and if a specific retention period is required by law.

7. HOW WE KEEP YOUR INFORMATION SECURE

We have reasonable security measures in place to protect your personal information and to minimise the impact of a breach.

We base our security measures on the sensitivity of the personal information that we hold. Our security measures are in place to protect your personal information from:

- loss
- misuse
- unauthorised access
- being altered
- being destroyed

We regularly monitor our systems for possible vulnerabilities and attacks.

No system is perfect, and we cannot guarantee that we will never experience a breach of any of our physical, technical, or managerial safeguards, but we regularly monitor our systems for vulnerabilities.

We will let you know of any breaches that may affect your personal information.

If something should happen, we have taken steps to minimise the threat to your privacy, and we will let you know if your personal information has been compromised.

We will also let you know how you can help minimise the impact of the breach.

8. YOUR PERSONAL INFORMATION RIGHTS

You may ask us about your personal information.

You have the right to know when we collect and use your personal information and ask us what we know about you and what we do with that information.

You may access your personal information.

You may ask to access your own personal information by contacting [email address of your information officer/ deputy information officer].

We may take up to one month to respond to your request and may charge a fee in some circumstances. We will let you know if this is the case.

You have control over your personal information.

You may:

- ask that we update incorrect personal information, or complete personal information that may be incomplete;
- ask that we delete your personal information;
- ask to receive your personal information in a structured, commonly used and machine-readable format;
- ask that we reuse your personal information for your own purposes across different services;
- object to the processing of your personal information under certain circumstances;

- object to automated decision-making and profiling;
- ask that a human review any automated decisions that we make about you, express your point of view about it, and obtain an explanation of the decision. You may challenge any automated decision made about you;
- withdraw any consent you have given us; and
- ask that we restrict our use of your personal information.

You have the right to unsubscribe.

You have the right to unsubscribe from any direct marketing we send you. Please email info@denvoomedica.com to do so.

You have the right to lodge a complaint with the Information Regulator.

You can contact the Information Regulator at inforeg@justice.gov.za.