

## Privacy Notice

### 1. Introduction

In conducting the business of a medical scheme, Medshield Medical Scheme will collect and/or receive, process and share personal information with various third parties of applicants, members, healthcare professionals and brokers.

Medshield is obliged in terms of the law, and it undertakes, to implement all reasonable steps to protect the personal information of any person.

### 2. Purpose

This privacy notice intends to inform you about:

- 2.1. when do we collect personal information;
- 2.2. how your personal information is collected,
- 2.3. what and why your personal information is processed;
- 2.4. who we share your personal information with;
- 2.5. how we protect your personal information;
- 2.6. your rights in respect of your personal information.

### 3. What is personal information?

Personal information is information that identifies a natural/juristic person, and includes, but it is not limited to:

- 3.1. race, gender, sex, pregnancy, marital status, nationality, ethnicity or social origin; colour; sexual orientation; age; physical or mental health, well-being, disability;
- 3.2. religion, conscience, belief, culture, language and birth;
- 3.3. education, medical information, financial information, criminal or employment history;
- 3.4. any identifying number or symbol;
- 3.5. e-mail address, physical address, telephone number, location information, or any online identifier or other particular assignment to a person;
- 3.6. biometric information;
- 3.7. personal opinions, views or preferences of a person
- 3.8. correspondence of private or confidential nature;
- 3.9. views or opinions of another individual about the person;
- 3.10. the name of a person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.

#### **4. Different methods on how we collect Personal information**

##### 4.1. Directly from you during:

- 4.1.1. a request for a quote;
- 4.1.2. an enquiry about us as for any other reasons;
- 4.1.3. an application process;
- 4.1.4. authorisation requests;
- 4.1.5. wellness days;
- 4.1.6. updates; and
- 4.1.7. any other engagement with Medshield via the Medshield website or other online portals/platforms.

4.2. Indirectly from you when you interact with us electronically, for instance when you are browsing our website, mobile application, Facebook page, LinkedIn page, and any of our social media pages as well as through any third party contracted to Medshield to market its products. We may collect information from you, such as your internet address, server logs, data collected through cookies, pixel tags, and other similar technologies .

##### 4.3. Directly from other sources, such as:

- 4.3.1. public databases;
- 4.3.2. data aggregators;
- 4.3.3. Credit bureaus;
- 4.3.4. Fraud prevention agencies;
- 4.3.5. Your broker;
- 4.3.6. Your banker; and
- 4.3.7. Your healthcare providers.

#### **5. Purpose of processing personal information**

Medshield collect and process information in order to service different stakeholders, which are:

- Applicants for membership in order to conduct appropriate underwriting.
- Members in order to provide you with services as contemplated by the Medical Schemes Act 131 of 1998 (as amended), Medshield Scheme Rules as well as the contractual obligation relating to you benefit entitlements.
- Healthcare providers in order to reimburse you for the services you provided to our member, conduct peer review, conduct claim risk assessment as well as conduct peer review for fraud risk management.
- Service providers contracted to Medshield in order to ascertain the services provided, assess the level of services provided, ascertain or manage fraud exposure any as well as pay for services provided.
- Job seekers looking for employment, who register and curriculum vitae in application for an advertised position.

- Website browsers in order to provide them with:
  - a solution for healthcare cover via providing newsletters and information on our products and services;
  - a quote, respond to questions or queries, and send you information on our products and services.

Medshield may collect personal information from website users in order to conduct a corporate transactions, audits, and data analysis; conduct research and analytics about the use of its Site and interaction with it; develop new products; improve its site and its existing products and services; identify usage trends; assess the performance of its advertisements; optimize its advertising campaigns; and determine the effectiveness of its communications.

## **6. Storage and Retention of Personal Information**

All personal information collected by Medshield will be stored as follows:

- 6.1. In a secure and safe manner according to strict information security principles with safeguards to ensure its privacy and confidentiality;
- 6.2. For no longer than is necessary to achieve the purpose for which it was collected unless further retention is:
  - Required by law or contractual obligation;
  - Otherwise reasonably required by Medshield for lawful purposes related to its functions and activities in Medshield's operation;
  - Retained further with the person's consent;
  - In the event of retaining personal information for an extended period, such extended retention will be subject to restrictions; and
  - After which the personal information will be de-identified and disposed of as per the Medshield's Retention of Records policy. When deleting or destroying the personal information Medshield will do so in manner that prevents its reconstruction.

## **7. Third Parties we disclose personal information**

- 7.1. During the course of business, Medshield shares personal information with various stakeholders who are:
  - Brokers of the applicants for membership as well their healthcare provider where required for underwriting purposes;
  - All services providers contracted to Medshield, including but not limited to managed healthcare organisations, appointed to service members of Medshield in order to manage a disease and managed a health risk identified;
  - Healthcare Provider Associations, managed healthcare organisations contracted to Medshield in order to conduct healthcare provider profiling, fraud risk assessment and/or intervene for the benefit of members;
  - Service Providers contracted to Medshield for the servicing of Medshield members as well as conduct background checks for governance purposes; and

- Any other service provided contracted to Medshield to provide a service or information about a service to users/members.
- 7.2. The personal information shared is shared with the consent of the data subject, in terms of the contractual obligation as well as to provide you with a solution to healthcare cover and services.
- 7.3. Medshield shares personal information in a secured encrypted platform.
- 7.4. As a Data subject you have a right to ask for personal information shared with a third party. You may direct your request to the Information Officer of Medshield whose details is provided below.
- 7.5. Medshield may not require your consent where:
- we are required to do so by law;
  - it is necessary to protect Medshield's legitimate interest, your legitimate interest or the legitimate interest of a third party to whom the information is supplied;
  - we are ordered to do so by a court of law; and
  - the Information Regulator provides an exemption to Medshield;
- as contemplated by the Protection of Personal Information Act 4 of 2013.

## **8. Data Security**

Medshield uses reasonable organisational, technical, and administrative measures to protect personal information and all data under its control. Unfortunately, no data transmission over the internet or data storage system can be guaranteed to be 100% secure. If you feel that the security of any personal information we hold about you has been compromised, please notify the Information Officer on the contacts below.

## **9. Rights of Data Subjects**

A data subject you have the right to:

- As an applicant for membership you may object to the processing of your personal information but such objection will hinder Medshield from activating membership;
- As a member you may object to the processing of your personal information however such objection will hinder Medshield from providing its contractual obligation and service to you;
- Know what personal information Medshield and its contracted service provider holds; and
- Enquire about the personal information in possession of Medshield and its contracted service providers subject to the completion of a PAIA form found on the Medshield website.

## **10. Details of the Information Officer**

Ms Ntsoaki Ngwenya  
Information Officer  
[Ntsoakin@medshield.co.za](mailto:Ntsoakin@medshield.co.za)

Mr Jan Potgieter  
Deputy Information Officer  
[Janp@medshield.co.za](mailto:Janp@medshield.co.za)