

Privacy Statement for SABMAS administered by 3Sixty Health (Pty) Ltd

- This document reflects the Privacy Statement for SABMAS administered by 3Sixty Health (Pty) Ltd.

PRIVACY STATEMENT – HOW WE WILL PROCESS AND DISCLOSE YOUR PERSONAL INFORMATION AND COMMUNICATE WITH YOU

Definitions

The Scheme refers to SAB Medical Aid, registration number 1209, registered with the Council for Medical Schemes.

Administrator refers to 3Sixty Health (Pty) Ltd, registration number 1978/001109/07, an authorised financial services provider, the administrator and managed care organization for the Scheme.

You and your refers to you the member and your registered dependants on your medical scheme plan.

Your personal information refers to all personal information the 3SixtyHealth has on you, or persons which are related to you or under your authority (as relevant). It includes:

- financial information;
- information about your health, race or ethnic origin, biometrics, criminal behaviour or religion;
- your gender;
- your age;
- unique identifiers such as your identity number or contact numbers; and
- addresses.

Competent person means anyone who is legally competent to consent to any action or decision being taken for any matter concerning a member or dependant for example a parent, legal guardian or a legal representative appointed by a court to manage the finances, property, or estate of another person unable to do so because of mental or physical incapacity.

1. When you engage with the Scheme and Administrator, you trust us with personal information about yourself or your family. We are committed to protecting your right to privacy.
2. The purpose of this Privacy Statement is to set out how we collect, use, share and otherwise process your personal information, in a manner that is compliant, ethical, adheres to industry best practice and applicable protection of personal information legislation as enacted from time to time.
3. We have a duty to take all reasonably practicable steps to ensure your personal information is complete, accurate, not misleading and updated on a regular basis. To enable this, we will always endeavour to obtain personal information from you directly. Where we are unable to do so, we will make use of verifiable independent third party data sources.
4. Please note you have the right to object to the processing of your Personal Information.
5. **SAB Medical Aid and 3Sixty Health (Pty) Ltd** (we/us) will keep any information, including Personal Information relating to yourself and your dependant/s and/or beneficiaries, supplied to us in this application or collected from other sources confidential.

6. Where you have joined as a member of an employer group, your employer holds your application form and information relating to such application. We may request such information regarding your application from your employer, which will, for the avoidance of doubt, be limited to specific information that is strictly relevant to your application.
7. You understand that when you include your spouse and/or dependents on your application, we will process their personal information for the activation of the policy/benefit and to pursue their legitimate interest related to your application. By submitting your dependants' relevant personal information, you hereby confirm that you are duly authorised to share such information with us. We will furthermore process their information for the purposes set out in this Privacy Statement.
8. Each party accepts responsibility to the extent that the processing activities of personal information fall under the control of that party and agrees to indemnify the other party/ies against any loss or damage, direct or indirect, that an employee may suffer because of any unauthorised use of the employees' personal information or if a breach of the employees' personal information occur, but only if the processing of that personal information is controlled by that party.
9. You agree to us processing and disclosing your Personal Information in the following manner: We may collect, collate, process, store and disclose your Personal Information:
 - a. For the administration of your health plan;
 - b. For providing managed care services to you or any dependant/s on your health plan;
 - c. For providing relevant information to a contracted third party who requires this information to provide a healthcare service to you or any dependant/s on your health plan;
 - d. To analyse risk trends and profiles;
 - e. For academic research conducted by any company within 3Sixty Health and/or contracted research and survey providers in South Africa as well as outside the borders of the Republic;
 - f. To share your personal information with external health providers for the purposes of evaluating certain clinical information, in the event that you require medical treatment.

Examples of how this will happen includes:

- a. Sharing your Personal Information with your chosen financial adviser during the application process to help us, if necessary, to process your membership application;
- b. Obtaining and sharing your Personal Information with other relevant sources, including any entity that is part of 3Sixty Health, medical practitioners, contracted service providers, health information exchanges, financial advisers, credit bureaus or industry regulatory bodies ("Sources"), and further processing of such information to consider your membership application, to conduct underwriting or risk assessments, or to consider a claim for medical expenses. We may (at any time and on an ongoing basis) verify with the Sources that your Personal Information is true, correct and complete;
- c. Getting and sharing any information that is strictly relevant to your application from or with your employer, if you have joined as a member of an employer group;
- d. Communicating with you about any changes in your health plan, including your contributions or changes and enhancements to the benefits you are entitled to on the health plan you have chosen;

- e. Making use of external health specialists to assess or evaluate certain clinical information. Your Personal Information will be shared with such specialist/s in the event that you or your dependant/s are subject to such a clinical assessment.
10. If asked to do so, we will share your Personal Information with a third party if you have already given your consent for the disclosure of this information to such third party or if a contractual relationship exists in terms of which we are obliged to provide the information to such third party.
11. You consent and agree that:
 - we may process your information, including personal information, to adhere to South African Legislative reporting obligations and to perform transaction monitoring activities;
 - we may communicate such personal information to local Regulatory Bodies as well as to other entities in the 3Sixty Health if any Legislative reportable matters are identified.
12. We may provide your Personal Information to any other entity within 3Sixty Health with whom you or your dependant/s already have a relationship or where you or your dependant/s have applied for a product or benefit from such entity, provided you have given your consent to such entity for us to do so. This information will be provided for the administration of your or your dependant's products or benefits with other entities within 3Sixty Health.
13. We may process your information using automated means (without human intervention in the decision making process) to make a decision about you or your application. You may query the decision made about you.
14. We may provide any credit bureau, credit providers or industry association with any information about your consumer credit record, including Personal Information about any judgement or default history.
15. If we want to share your Information for any other reason, we will do so only with your permission.
16. You have the right to request a copy of the Personal Information we hold about you. If you wish to access this information, please complete a 'PAIA Form to Request Access to Records' available. We will take all reasonable steps to confirm your identity before providing details of your personal information in respect of this request. We are entitled to charge a fee for this service and will let you know what it is at the time of your request.
17. You have the right to contact and ask us to update, correct or delete your Personal Information.
18. You agree that we may retain your Personal Information until such time as you request us to destroy it (unless we are obliged by law to retain it, regardless of such request, for the pursuit of our legitimate business purpose). Where we cannot delete your personal information, we will take all practical steps to anonymize it.

19. If the Scheme, becomes involved in a proposed or actual merger, acquisition or any form of sale of some or all its assets, we may use and disclose your Personal Information to third parties in connection with the evaluation of the transaction. The surviving company, or the acquiring company in the case of a sale of assets, would have access to your Personal Information which would continue to be subject to this Privacy Statement.
20. You have the right to ask us to update, correct or delete your personal information by completing the Request for Deletion or Correction of Information Form.
21. We are required to collect and retain information in terms of the following legislation (amongst others):
 - The Medical Schemes Act, 1998
 - The Consumer Protection Act, 2008
 - The Protection of Personal Information Act, 2013
 - Electronic Communications and Transactions Act, 2002
 - Promotion of Access to Information Act, 2000Legislation specific to 3SixtyHealth (Pty) Ltd only:
 - Financial Advisory and Intermediary Services Act, 2002
 - Companies Act, 2008
22. You agree that we may transfer your personal information outside South Africa:
 - if you give us an email address that is hosted outside South Africa; or
 - for processing, storage or academic research; or
 - to administer certain services, for example, cloud services.When we share your information to administer certain services, we will ensure that any country, company or person that we pass your personal information to agrees to treat your information with the same level of protection as we are obliged to do in South Africa. Unless you specifically give us consent to share your personal information with such person (or company).
23. You have the right to know what personal information the Scheme holds about you. If you wish to access this information, please complete a 'PAIA Form to Request Access to Records' available. We will take all reasonable steps to confirm your identity before providing details of your personal information in respect of this request. We are entitled to charge a fee for this service and will let you know what it is at the time of your request.
24. We may change this Privacy Statement from time to time. The most updated version will always be available on www.sabmas.co.za.
25. If you believe that the Scheme or Administrator have used your personal information contrary to this Privacy Statement, you have the right to lodge a complaint with the Information Regulator. However, we encourage you to first follow our internal complaints process to resolve the complaint or contact the Information Officer at privacy@3Sixtyhealth.co.za. If, thereafter, you feel that we have not resolved your complaint adequately kindly contact the Information Regulator at:

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Signature of main applicant