

DR MARK TUNBRIDGE & ASSOCIATES

Standard Website Privacy & Cookies Policy

The Protection of Personal Information Act, 2013 ("POPI") came into complete commencement on 1 July 2021, in this regard we have a number of obligations and duties in terms of POPI that we must comply with. The protection of your personal information is a high priority for us and we have taken steps to ensure that your personal information is protected and remains private.

In addition to this document serving as our privacy policy, this document will also serve as our data subject notification as contemplated in section 18 of POPI. In this regard, this document will inform you of what personal information we collect, why we collect it, how we use it and what safety measures are in place to protect it.

Where we refer to "process", it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. As a general rule we will only process your personal information if this is required to deliver or offer a service, provide a product or carry out a transaction.

We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

In this document any reference to "we" or "us" or "our" is reference to DR MARK TUNBRIDGE & ASSOCIATES.

We may change this Privacy Policy from time to time if the law or our business practices requires it.

The version of the Privacy Policy displayed on our website at the time of your interaction with us will be applicable.

What is personal information?

Personal information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

Name and surname

Identity/passport number

Date of birth and age

Contact details

Document Number:

Residential address

Medical history

Physical health information Mental health information

Psychological assessments and reports

Treatment and consultation information

Medication information

Medical aid information

Payment and billing information

Emergency contact details

Information relating to dependants/minors, where applicable

Correspondence with the practice

Information provided by another healthcare professional

Information contained in referrals

IP address, browser/device information and website usage information, where applicable

Is the supply of the personal information voluntary or mandatory?

The provision of certain personal information is mandatory where we are required by law to collect or process that information, or where the information is necessary for us to provide our services, enter into or perform a contract with you, or comply with our legal and regulatory obligations.

Where personal information is mandatory, we will inform you where reasonably possible why the information is required and the consequences of not providing it.

In other instances, the provision of personal information is voluntary. However, if you choose not to provide information that we reasonably require to provide our services, respond to your enquiry, administer our relationship with you, or fulfil a particular request, we may not be able to provide the relevant service or respond fully to your request.

We will only collect and process personal information where there is a lawful basis for doing so, including where processing is necessary to comply with a legal obligation, perform a contract, or pursue a legitimate interest, or where you have provided consent where consent is required.

Where applicable, we may be required to process personal information in terms of legislation relevant to our business and the services we provide

Document Number:

Basic Conditions of Employment Act, No. 75 of 1997

Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993

Constitution of the Republic of South Africa, 1996

Employment Equity Act, No. 55 of 1998

Income Tax Act, No. 58 of 1962

Labour Relations Act, No. 66 of 1995

National Health Act, No. 61 of 2003

Occupational Health and Safety Act, No. 85 of 1993

Promotion of Access to Information Act, No. 2 of 2000 (PAIA)

Protection of Personal Information Act, No. 4 of 2013 (POPIA)

Skills Development Act, No. 97 of 1998

Unemployment Insurance Act, No. 63 of 2001

Mental Health Care Act, No. 17 of 2002

Children's Act, No. 38 of 2005

Electronic Communications and Transactions Act, No. 25 of 2002

Medicines and Related Substances Act, No. 101 of 1965

Health Professions Act, No. 56 of 1974

National Health Act, No. 61 of 2003

In other instances the supply of personal information is voluntary, which means there is no law imposed on us to collect this personal information. Even though there is no law that imposes the collection of the personal information, we require the personal information to deliver the products and/or services to you. In this regard, if you do not supply the personal information, we cannot do business with you. s

When will we process your personal information?

We will only process your personal information for lawful purposes relating to our business if the following applies:

- if you have consented thereto.
- if a person legally authorised by you, the law, or a court, has consented thereto.
- if it is necessary to conclude or perform under a contract, we have with you.
- if the law requires or permits it.
- if it is required to protect or pursue your, our or a third party's legitimate interest.

What is special personal information?

Document Number:

Special personal information is personal information about the following:

Biometric information	Philosophical beliefs	Sex life
Criminal behaviour	Political persuasion	Trade union membership
Ethnic origin	Race	
Health	Religious beliefs	

When will we process your special personal information?

We may process your special personal information in the following circumstances:

- if you have consented to the processing.
- if the processing is needed to create, use, or protect a right or obligation in law.
- if the processing is for statistical or research purposes and all legal conditions are met.
- if the special personal information was made public by you.
- if the processing is required by law.

When and from where we obtain personal information about you?

We may collect personal information about you from the following sources:

- We may collect personal information directly from you.
- We may collect personal information from a public record.
- We may collect personal information from an area where you have deliberately made it public.
- We may collect information about you based on your use of our products, services, or service channels.
- We may collect information about you based on how you engage or interact with us such as via our support desk, emails, letters, telephone calls and surveys.
- We may collect personal information from a third party.
- We may collect personal information from another source if you give us consent to do so.

If the law requires us to do so, we will ask for your consent before collecting personal information about you from third parties.

The third parties from whom we may collect your personal information include, but are not limited to, the following:

- the patient;
- a parent or legal guardian, where applicable;
- another healthcare practitioner;
- medical aid schemes/administrators;
- hospitals or healthcare facilities;
- referral sources;
- laboratories or other healthcare service providers;
- authorised representatives;
- persons legally authorised to provide information;
- regulatory or governmental authorities where required by law.

Reasons we need to process your personal information.

Document Number:

We will process your personal information for the following reasons:

- To register and manage patients;
- Provide medical and/or psychological services;
- To assess, diagnose and treat patients where applicable;
- To maintain patient and healthcare records;
- To communicate with patients regarding appointments and treatment;
- To process medical aid claims and payments;
- To communicate with other healthcare professionals where authorised or required;
- To comply with legal, regulatory and professional obligations;
- To protect the rights, safety and legitimate interests of patients and the practice;
- To respond to enquiries and complaints;
- To manage referrals;
- To maintain appropriate records;
- To conduct quality assurance and administrative functions;
- For any other lawful purpose compatible with the purpose for which the information was collected.

How we use your personal information for marketing

- We will use your personal information to our products and services to you.
- We will do this in person, by post, telephone, or electronic channels such as SMS, email, and fax.
- If you are not our customer, or in any other instances where the law requires, we will only market to you by electronic communications with your consent.
- In all cases you can request us to stop sending marketing communications to you at any time.

When how and with whom we share your personal information?

In general, we will only share your personal information where one or more of the following applies:

- if you have consented to the sharing;
- if it is necessary to conclude or perform a contract with you;
- if we are required or permitted to do so by law;
- if it is necessary to protect or pursue your, our or a third party's legitimate interests; or
- where it is necessary for us to provide our products or services and the recipient is authorised to process your personal information for that purpose.

We may share your personal information with:

- our employees and authorised representatives who require the information to perform their duties;
- service providers and operators who process personal information on our behalf and in accordance with our instructions;
- professional advisers or other authorised third parties where necessary to provide our services or protect our legitimate interests; and
- regulatory authorities, government institutions, courts or other persons where we are legally required or permitted to disclose the information.

Document Number:

We will take appropriate steps to ensure that any third party processing your personal information provides an appropriate level of protection and processes the information in accordance with applicable data protection requirements.

How we secure your personal information

- We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:
 - keeping our systems secure (like monitoring access and usage);
 - storing our records securely.
 - controlling the access to our buildings, systems and/or records; and
- safely destroying or deleting records.
- Ensure compliance with best practice standards.

How long do we keep your personal information?

We will keep your personal information for as long as:

- the law requires us to keep it.
- a contract between you and us requires us to keep it.
- you have consented for us keeping it.
- we are required to keep it to achieve the purposes listed in this Privacy Policy.
- we require it for statistical or research purposes.
- a code of conduct requires us to keep it; and / or
- we require it for our lawful business purposes.

Take note: We will retain patient and other personal information for as long as reasonably necessary to fulfil the purposes for which it was collected, or for as long as required or permitted by applicable legislation, professional requirements, regulatory requirements or other lawful purposes.

Our cookie policy

A cookie is a small piece of data sent from our websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise your experience on our websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, like the computer or smart phone.

By using our websites or applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable us to know that you have visited the website or application before and will identify you. We may also use the cookie to prevent fraud and for analytics.

Your duties and rights about the personal information we have about you.

You must provide proof of identity when enforcing the rights below.

Document Number:

You must inform us when your personal information changes.

Please contact our Information Officer to give effect to any of the below rights.

You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- confirmation that we hold your personal information.
- a copy or description of the record containing your personal information; and
- the identity or categories of third parties who have had access to your personal information.

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. We will inform you of the fee before attending to your request.

Please note that the law may limit your right to access information.

You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or we are no longer authorised to keep it. You must inform us of your request in writing. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.

A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

You may object on reasonable grounds to the processing of your personal information.

We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and our processing done according to your consent or the processing is necessary to conclude or perform under a contract with you.

Where you have provided your consent for the processing of your personal information, you

may withdraw your consent. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information. You must inform us of any objection in writing.

You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.

The contact details for the Information Regulator is as follows:

Document Number:

Email:	POPIAcomplaints@inforegulator.org.za
Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Physical Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

How can you get in touch with us?

For any queries in relation to this letter or our processing of your persona information in general, you can contact our Information Officer and/or Deputy Information Officer at the following details:

Name:	Yumnaa Morris
Contact Number:	021 674 0509
Email Address:	accounts@psychologymatters.co.za
Physical Address:	Suite 102 First Floor, IPIC Renewal House 20 Dreyer Str.