

Privacy Policy

This privacy notice provides details of the personal information we collect from you, what we do with it, how you might access it and who it might be shared with.

Our Organisation

Scriptpharm
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ATTENTION all children

This is a very important notice which we must share with you and any one of your parents or legal guardians. To make use of our services, we need information which is personal to you. For example, your name, your email address and your phone number. It might be so that we cannot use your information unless your parent agrees. Please tell your parents to read the notice below.

ATTENTION all parents / legal guardians

In order for children to make use of our services we need to use their personal information and for this we are required by law to obtain the consent of a parent or legal guardian. Before deciding on consent it is important for parents to understand our information security and privacy policies. It is equally important for parents to explain to children, the implications of not providing our organisation with the proper consent. A link to our consent form can be found wherever we collect personal information of children.

What we do with your personal information

We use your personal information only for the purpose for which it is collected. Among others, this purpose could be to provide a service, assist us with administration, recruit prospective employees or even to comply with a legal obligation. We may use your personal information for other similar purposes, including marketing and communications, but that will only occur in the case where we have your consent or another lawful justification for doing so.

From our **Patients** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed
Medical treatment, prescription and referrals	S11 - To conclude or perform a contract to which the data subject is party	Upon conclusion of the service, event or promotion
Membership administration and management	S11 - To conclude or perform a contract to which the data subject is party	Upon conclusion of the service, event or promotion
Auditing and taxation services	S11 - For the proper performance of a public law duty by a public body	Until no longer needed for purposes of proof
Customer sales, service and support	S11 - For the proper performance of a public law duty by a public body	Until no longer needed for purposes of proof
Medical treatment, prescription and referrals	S11 - We have the data subject's consent	Until consent withdrawn
Customer sales, service and support	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre Operations)	Until contract completed

Medical consultation and examination	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre Operation)	Until contract completed
Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre Operation)	Until contract completed
Membership administration and management	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre Operation)	Until contract completed
Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Section 21 prescriptions sent to Suppliers to place order for medication.)	Until no longer needed for purposes of proof
Auditing and taxation services	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Customer sales, service and support	S11 - We have the data subject's consent	Upon conclusion of the service, event or promotion

From our **Patients** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Customer sales, service and support	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed

Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Membership administration and management	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	When historical, statistical or research purpose expires
Medical treatment, prescription and referrals	S11 - To conclude or perform a contract to which the data subject is party	When historical, statistical or research purpose expires
Auditing and taxation services	S11 - For the proper performance of a public law duty by a public body	Until no longer needed for purposes of proof
Medical treatment, prescription and referrals	S11 - For the proper performance of a public law duty by a public body	As per the Pharmacy Act , records needs to be kept for 5 years
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed
Medical treatment, prescription and referrals	S11 - To conclude or perform a contract to which the data subject is party	Upon conclusion of the service, event or promotion
Membership administration and management	S11 - To conclude or perform a contract to which the data subject is party	Upon conclusion of the service, event or promotion
Medical treatment, prescription and referrals	S11 - We have the data subject's consent	Until consent withdrawn

Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Section 21 medication prescriptions sent to Supplier for the authorising of controlled substances.)	Until no longer needed for purposes of proof
Auditing and taxation services	S11 - We have the competent person's consent	Until no longer needed for purposes of proof
Customer sales, service and support	S11 - We have the competent person's consent	Upon conclusion of the service, event or promotion
Personalised services to beneficiaries	S11 - We have the competent person's consent	Upon conclusion of the service, event or promotion

From our **Children** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Membership administration and management	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Medical treatment, prescription and referrals	S11 - For the proper performance of a public law duty by a public body	As per law all records need to be kept for 5 years
Medical treatment, prescription and referrals	S11 - We have the data subject's consent	Until consent withdrawn

From our **Beneficiaries** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Membership administration and management	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Auditing and taxation services	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Reports of all medical aid claims are sent to the applicable medical aids)	Until no longer needed for purposes of proof
Medical treatment, prescription and referrals	S11 - For the proper performance of a public law duty by a public body	As per Law , records needs to be kept for 5 years
Membership administration and management	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed
Customer sales, service and support	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Personalised services to beneficiaries	S11 - We have the competent person's consent	Until no longer needed for purposes of proof

From our **Service Providers** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of data subject's access
Customer sales, service and support	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Employee monitoring	S11 - We have the data subject's consent	Until no longer needed for purposes of data subject's access
Employee recruitment	S11 - We have the data subject's consent	Until no longer needed for purposes of data subject's access
Employment and performance management	S11 - We have the data subject's consent	Until no longer needed for purposes of data subject's access
Legal advice and representation	S11 - We have the data subject's consent	Until no longer needed for purposes of data subject's access
Student enrolment and ongoing administration	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Student examinations and assessments	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Student transfers and exits	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Travel and events management	S11 - We have the data subject's consent	Until no longer needed for purposes of proof

Customer sales, service and support	S11 - We have the data subject's consent	Upon conclusion of the service, event or promotion
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed
Auditing and taxation services	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof
Customer sales, service and support	S11 - We, the Responsible Party must comply with a legal obligation	Until tax or other legal retention period expires
Membership administration and management	S11 - We, the Responsible Party must comply with a legal obligation	Until tax or other legal retention period expires
Business advisory		
Auditing and taxation services	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until tax or other legal retention period expires

From our **Legal Guardians** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Customer sales, service and support	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Membership administration and management	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Medical treatment, prescription and referrals	S11 - For the proper performance of a public law duty by a public body	As per Pharmacy act, records need to be kept for 5 years
Auditing and taxation services	S11 - For the proper performance of a public law duty by a public body	Until no longer needed for purposes of data subject's access
Auditing and taxation services	S11 - For the proper performance of a public law duty by a public body	Until no longer needed for purposes of proof
Customer sales, service and support	S11 - For the proper performance of a public law duty by a public body	Until no longer needed for purposes of proof
Medical treatment, prescription and referrals	S11 - We have the data subject's consent	Until consent withdrawn

From our **Students** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Employee monitoring	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Employee recruitment	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Employment and performance management	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Student enrolment and ongoing administration	S11 - We have the data subject's consent	Until contract completed
Student examinations and assessments	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Student transfers and exits	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Auditing and taxation services	S11 - It is in our organisation's legitimate interest (Legal and regulatory compliance)	When historical, statistical or research purpose expires
Student enrolment and ongoing administration	S11 - It is in our organisation's legitimate interest (Legal and regulatory compliance)	When historical, statistical or research purpose expires
Student examinations and assessments	S11 - It is in our organisation's legitimate interest (Legal and regulatory compliance)	When historical, statistical or research purpose expires
Student transfers and exits	S11 - It is in our organisation's legitimate interest (Legal and regulatory compliance)	When historical, statistical or research purpose expires

From our **Competent Persons** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Customer sales, service and support	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Membership administration and management	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed

From our **Suppliers** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	When historical, statistical or research purpose expires
Customer sales, service and support	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Employee monitoring	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Employee recruitment	S11 - We have the data subject's consent	Until no longer needed for purposes of proof

Employment and performance management	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Legal advice and representation	S11 - We, the Responsible Party must comply with a legal obligation	Until no longer needed for purposes of proof
Student enrolment and ongoing administration	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Student examinations and assessments	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Student transfers and exits	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Auditing and taxation services	S11 - We have the data subject's consent	Upon conclusion of the service, event or promotion
Business advisory	S11 - We have the data subject's consent	Upon conclusion of the service, event or promotion
Customer sales, service and support	S11 - We have the data subject's consent	Upon conclusion of the service, event or promotion
Site management and security	S11 - We have the data subject's consent	Upon conclusion of the service, event or promotion
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of data subject's access
Stock Procurement	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of data subject's access

Stock Procurement	S11 - We, the Responsible Party must comply with a legal obligation	Until no longer needed for purposes of proof
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From our **Consultants** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Business advisory	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed

From our **Customers / Clients** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Section 21 medicines ordered on behalf of Client)	When historical, statistical or research purpose expires
Customer sales, service and support	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Medical treatment, prescription and referrals	S11 - It is in the legitimate interest of a third party to whom the information is supplied (Private Call Centre operations)	Until contract completed
Membership administration and management	S11 - It is in the legitimate interest of a third party to whom the information is supplied	Until contract completed
Customer sales, service and support	S11 - We have the data subject's consent	Until no longer needed for purposes of proof

Employee recruitment	S11 - We have the data subject's consent	Until contract completed
Student enrolment and ongoing administration	S11 - We have the data subject's consent	Until contract completed
Student examinations and assessments	S11 - We have the data subject's consent	Until contract completed
Student transfers and exits	S11 - We have the competent person's consent	Until contract completed
Travel and events management	S14 - For purposes of proof, where processing has been restricted	Until tax or other legal retention period expires
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until no longer needed for purposes of proof
Maintaining a do-not-contact list	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Medical treatment, prescription and referrals	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Membership administration and management	S11 - We have the competent person's consent	Until no longer needed for purposes of proof
Personalised services to beneficiaries	S11 - We have the data subject's consent	Until no longer needed for purposes of proof
Customer sales, service and support	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed
Medical treatment, prescription and referrals	S11 - To conclude or perform a contract to which the data subject is party	Upon conclusion of the service, event or promotion

Membership administration and management	S11 - To conclude or perform a contract to which the data subject is party	Upon conclusion of the service, event or promotion
Auditing and taxation services	S11 - For the proper performance of a public law duty by a public body	Until no longer needed for purposes of proof
Customer sales, service and support	S11 - For the proper performance of a public law duty by a public body	Until no longer needed for purposes of data subject's access

From our **Prospective Employees** we collect, use and retain personal information for the following purposes and periods, with the applicable lawful basis.

Processing purpose	Lawful basis	Retention period
Employee recruitment	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed
Student enrolment and ongoing administration	S11 - To conclude or perform a contract to which the data subject is party	Until contract completed
Employee monitoring	S11 - It is in our organisation's legitimate interest (Legal and regulatory compliance)	Until consent withdrawn

What personal information do we collect?

We only collect the minimum amount of information that is relevant to the purpose. If you interact with us on the internet, the personal information we collect depends on whether you just visit our website or, use our services.

If you use our services, personal information is required to fulfil the requirements of that service.

Generally, we collect the following personal information. If there is any *specific* personal information to collect, we will indicate as such, at or near the time of collection.

- Online identifier
- Physical address
- Identification Number
- Telephone number
- Confidential Correspondence
- Education history
- Employment history
- Email address
- Financial & banking details
- Location information
- Name, together with other identifying information
- Personal opinions, views or preferences
- Delivery address

Special personal information could be about your health, your racial or ethnic origin, your trade union membership etc. We collect the following special personal information, under the appropriate lawful basis:

- Health or sex life
 - S32 - We comply with provisions concerning a data subject's health or sex life
 - S27 - We have the data subject's consent
 - S27 - To comply with an obligation of international public law
- Race or ethnic origin
 - S27 - We have the data subject's consent
- Criminal behaviour - allegations
 - S27 - We have the data subject's consent
 - S27 - For the establishment, exercise or defence of a right or obligation in law
- Biometric information
 - S27 - We have the data subject's consent
 - S27 - For the establishment, exercise or defence of a right or obligation in law

Who might we share your personal information with?

To maintain and improve our services, your personal information may need to be shared with or disclosed to our service providers, other organisations such as ours or, in some cases, public or legal authorities.

For the following purposes we may disclose your personal information to authorised third parties because it's in their legitimate interests:

- Customer sales, service and support
- Medical consultation and examination
- Medical treatment, prescription and referrals
- Membership administration and management
- Auditing and taxation services

If we transfer your personal information outside of South Africa, we apply the necessary safeguards which include, confirming whether the receiving country has the proper data protection law, ensuring that there is a binding agreement between parties or, if the transfer is internal to our organisation, commitment to binding corporate rules. Details of these safeguards may be obtained by contacting us directly.

How do we look after personal information?

We limit the amount of personal information collected to only what is fit for the purposes as described above. We restrict, secure and control all of our information assets against unauthorised access, damage, loss or destruction; whether physical or electronic. We retain personal information only for as long as is described above, to respond to your requests, or longer if required by law. If we retain your personal information for historical or statistical purposes we ensure that the personal information cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal information.

How can you access your personal information?

You have the right to request access to any of your personal information we may hold. If any of that information is incorrect, you may request that we correct it. If we are improperly using your information, you may request that we stop using it or even delete it completely.

If you would like to make a request to see what personal information of yours we might hold, you may make a request from our organisation website or contact us as per the details below.

Where you have previously given your consent to process your personal information, you also have the right to request that we transmit your personal information to a different service provider.

Where it may have been necessary to get your consent to use your personal information, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal information without affecting the lawfulness of processing based on consent before your withdrawal.

Our Information Officer

Information Officer:	Marzanne Slabber Acting MD
Email:	Marzanne@scriptpharm.co.za
Telephone:	+27(11) 100 7557

Organisation email:	Marzanne@scriptpharm.co.za enquiries@scriptpharm.co.za
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Direct questions or incidents to report: email above
informationofficer@afrocentrichealth.com

The SA Information Regulator

You have the right to lodge a complaint with the SA Information Regulator. See the Information Regulator contact details below.

The Information Regulator (South Africa)

JD House
27 Stiemens St
Braamfontein
2017

PO Box 31533
Braamfontein
2017

The Information Regulator (South Africa)

Telephone: 010 023 5200
email: enquiries@infoeregulator.org.za