

## Heath Wentzel Optometrists Privacy Policy

As part of our aim and undertaking to be focused on your well-being and giving you the best care possible, we value and respect your privacy and are committed to protect your personal information with integrity, whilst also attaining statutory compliance.

In order to provide you with our products and services, we need to process personal information, and in some instances it is regarded as special information (health and biometrics for example) on you for legitimate business and optometry purposes.

Personal information is identifiable information on you that includes your name, name, gender, age, physical health, medical history, medical aid details, well-being, disability, identity number, email address, telephone contact details, physical address, biometric information (retinal scans), race or nationality, preferences (visual correction preferences), profile on school children and correspondence with you.

The processing of information has a far reaching meaning to include the collection, receipt, recording, organizing, storage, updating, retrieval or use of information, as well as its dissemination and destruction.

This Policy applies to all information held by all the Heath Wentzel Optometrist branches, our employees, third parties and contractors relevant to the collection, storage, use and disclosure of your personal information.

We will protect your privacy in a manner that achieves the conditions of the Protection of Personal Information Act (POPIA):

### **With accountability**

We inherently take our responsibility to be answerable to you and Government seriously, and conduct ourselves and our service offering to you in a professional manner at all times, which specifically includes the processing of your information in an accountable way.

### **By way of practicing processing limitations**

We undertake to carry out the requirements of lawfulness, minimalism, justification and consent.

The information will be collected only directly from you, unless there has been a referral as allowed, or a minor is involved. It will be as is needed for the purposes herein below, so that we can best serve your optometry needs. We also collect information on account payers as given by their dependents for the express purpose of account liability.

Only your essential information is collected when you fill out a welcome card on arrival at our practices, make an online appointment, subscribe to a service, or contact us electronically or otherwise. We will not request or keep more information on you than is necessary for the carrying out of our services to you.

Should we need to process special information on you, we request that you give us consent so as to enable us to render our services to you in the best way possible.

Please note that in the rendering of our services to you we may need to share relevant information with your medical scheme, your school, parents and/or guardians, pathologists, ophthalmologists and other medical practices, other optometrists and authorised staff members or service providers, as is reasonably and practically necessary.

 **In using it only for the specific purpose for which it was collected.**

We collect your information to provide you with our services and products, focused on your well-being so as to give you the best vision care possible.

This would include the making of your appointment, assessing, prescribing and recording your diagnosis and corrective measures and treatment, accounting and historical records. This pertains to service and product history and spectacle prescription and fitting measurements.

We will retain this for as long as required by law, or is necessary for our legitimate business purposes which include making corrective recommendations based on your medical history.

We also use your information to manage your account, the performance of a contract, contact you, and manage your requests. If you have consented, we will also provide you with news and special promotions relevant to our practice. From time to time your information may be used to conduct internal research, for statistical purposes, to compile and maintain your profile and in order to customise our website to better serve you, the user.

We will not store your payment information, including credit card details, on our systems.

Your essential and minimal information is only shared with 3<sup>rd</sup> parties as is necessary for the delivering of their services which would include for example courier companies, corrective vision suppliers, and IT services. Other 3<sup>rd</sup> parties that would process personal information we hold could include international cloud and data archiving companies, and operational and employee and supplier business, financial or data administration services or software where relevant. All are bound by data protection laws.

 **There is a limitation on processing your information further.**

We will not process your information further than for the purpose at collection, unless you have consented thereto, or it is necessary for us to do so to comply with the law or legal right.

We will also need to do so however to mitigate a threat to your health as allowed for in POPIA.

We are expressly making you aware that we will need to in most cases share your information with medical aids, pathologists, ophthalmologists and other medical practices as required for the carrying out of optometry and related health services to you.

We may also use your information for other purposes, such as data analysis and identifying usage trends on our website.

#### **We will maintain information quality.**

We do this by taking reasonable steps to ensure that your personal information is complete, up to date and accurate. Upon consultations to our practices you are asked to check your details on file, which are used to update our systems and records. We don't keep irrelevant information on you.

The personal information of each patient will be retained by us and our Optimax software system for as long as you are treated by us. Once you inform us that you would no longer make use of our goods or services, your personal information will still be retained within the allowable statutory limits, where after it will be irrevocably deleted and/or destroyed.

#### **We will be open and transparent**

The above is clear from our undertakings of this Privacy Policy being public on our website and the availability of information we hold as prescribed in Promotion of Access to Information Act (PAIA) as is apparent from our S 51 PAIA Manual also on our website. Should our website make use of cookies, it would be for advertising information purposes and the information collected on our behalf by third parties is anonymous and does not personally identify you. Your web browser can be changed to reject cookies and the website will still be fully operational.

#### **Security safeguards**

The security of your personal information is of utmost importance to us. Unfortunately however, no method of transmission over the Internet, or method of electronic or physical storage is totally secure. We do however strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

Security safeguards of international standards have been put in place and are constantly maintained and monitored by an external IT support company, to protect your information

Measures in place include physical security safeguards (e.g. locks and alarm systems) as well as restricted pre-authorized staff or contracted 3<sup>rd</sup> party access and use control. We have world class information security protection software running to protect our systems and hardware. This includes backups, firewalls, Endpoint Disaster Protector and Recovery, anti-virus, anti-malware, anti-phishing, and bitlocker encryption technology.

The personal information of each patient will be stored in a 'cloud-based' server or backup server, the Optometrist's platform, and/or in a hard copy filing system in a safe and secure environment which meets the security requirements for POPI and international data protection laws.

#### **Your participation**

You have the right to access your information, revoke your consent, request the deletion of your information and to update it. You may also object to it being processed.

### **Accessing your information**

You have the right to request access to the personal information that we hold on you, within a reasonable time and format. This should be done in writing to us at the details below. In certain legal circumstances we may also provide your information to others. Please refer to our S51 PAIA Manual in this regard, which can also be found on our website.

### **Revoking of consent and deletion of your information**

The consent provided to us is for the purpose of collecting, accessing, using, transferring, sharing, storing, and destruction your personal information and can be revoked by you at any time.

The patient can revoke consent for any specific medical aid provider or any other person or provider who has access to the patient's personal information, at any time by contacting us and completing the required documentation. Once this information is captured and updated, the personal information will no longer be shared.

Please note that should you revoke all consent, your information will still be retained as required within statutory limits and thereafter irrevocably deleted and/or destroyed.

### **Amendment or updating of information**

Please keep us informed of changes to your information by using the contact details below, or on your next visit to any of our practices.

### **Objecting**

You have the right to object to our processing, or further processing of your personal information. Please do so in writing to the email address below, detailing the details and your reasons for doing so. Please note that in the compliance with your request, the delivery of our services may well be restricted or compromised as a result.

## [Changes to this Privacy Policy](#)

We may update Our Privacy Policy from time to time without notice.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## [Contact us](#)

If you have an enquiry or concern about our privacy policy, or you want to enquire about or request a copy of any of your personal data held by us, or exercise any other right in this regard, please contact us using one of the following methods:

Email: [compliance@hwoptom.co.za](mailto:compliance@hwoptom.co.za)

Telephone: 012 348 1177