
	SAMWUMED CUSTOMER PRIVACY NOTICE			
	Author:	INFORMATION OFFICER	Issue Date:	JULY 2021
	Approver:	SAMWUMED EXCO	Review Date:	JULY 2024
	Doc. No:	APO014-03	Issue No:	03



SAMWUMED CUSTOMER PRIVACY NOTICE



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PART A

Process Owners

SAMWUMED EXCO

Intent of this Notice

This Notice is intended to inform the approach towards the use of Personal Information when visiting the Scheme Website.


Responsibilities

Area	Responsibility
WEBSITE USERS	Acknowledges responsibility that by using the Scheme Website, the terms contained in this Notice and Customer Privacy Notice and Consent have been reviewed and agrees that personal information is collected, used, and transferred in accordance therewith.
THE PRINCIPAL OFFICER (PO)	Shall periodically review this Notice following the analysis of statutory requirements and related privacy documents.

Related Documents

- SAMWUMED Protection of Personal Information Act No.4 of 2013 (South Africa) (POPI) Policy; and
- SAMWUMED Manual Prepared in terms of Section 51 of the Promotion of Access to Information Act No.2 of 2000.




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Abbreviations and Definitions

Abbreviation / Term	Description / Definition
Cookies	Small pieces of text sent to your browser by a website visited to help that website remember information about such visits, which can both make it easier to visit the site again and make the site more useful for future use.
Data Subject	Any person who can be identified through name, online identifier, identity factor or similarly as a natural person.
EXCO	Executive Committee
IO	Information Officer
PO	Principal Officer
Personal Information	Information relating to an identifiable, living, natural person and, where applicable, an identifiable, existing juristic person.
SAMWUMED	South African Municipal Workers' Union National Medical Scheme.
The Scheme	South African Municipal Workers' Union National Medical Scheme.



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PART B

1 Introduction

- 1.1. We respect the privacy of everyone who visits this website. As a result, we would like to inform you regarding the way we would use your Personal Information. We recommend you read this Customer Privacy Notice and Consent so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this Policy. By using this website, you acknowledge that you have reviewed the terms of this Customer Privacy Notice and Consent to Use of Personal Information (the “Customer Privacy Notice and Consent”) and agree that we may collect, use, and transfer your personal Information in accordance therewith.
- 1.2. If you do not agree with these terms, you may choose not to use our site, and please do not provide any Personal Information through this site. This Customer Privacy Notice and Consent forms part of our Site Terms and Conditions of Use and such shall be governed by and constructed in accordance with the laws of South Africa. This Notice explains how we obtain, use, and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At SAMWUMED we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully, and openly.

2 Who is SAMWUMED?


- 2.1. SAMWUMED is a financially healthy, fully funded, nationally accredited, and self-administered medical aid scheme which covers approximately 75 000 lives throughout South Africa. It operates within a closed sector namely, local government and associated agencies and employees.

3 Information Collected

3.1. Collection of Personal Information

- 3.1.1. SAMWUMED collects and processes Personal Information to mainly provide access to our services and products, to help improve our offerings and for certain other purposes explained



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below. The type of information collected depends on the purpose for which it is collected and used. SAMWUMED will only collect information that we need for that purpose.

3.1.2. SAMWUMED directly collects information when provided with personal details, by way of example, when a product or service is purchased from us or when enquiries are submitted to us or when we are contacted. Where possible, SAMWUMED will inform data subjects which information is required by us and which information is optional.

3.1.3. Examples of information we collect includes: –

- 3.1.3.1. Names;
- 3.1.3.2. Physical addresses;
- 3.1.3.3. E-mail addresses;
- 3.1.3.4. Contact numbers (telephone/ cell number);
- 3.1.3.5. Any user-generated content, posts and other content submitted to our website.

3.1.4. SAMWUMED also collects information from other sources as explained below.

3.1.5. With consent, SAMWUMED may also supplement the information provided to us with information that we receive from other companies in the medical schemes industry in order to offer a tremendous experience.

3.2. The Collection of non-Personal Information

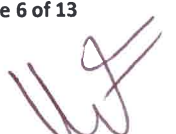
SAMWUMED may automatically collect non-Personal Information, such as the type of internet browsers used, or the websites linked to our website. SAMWUMED may also aggregate the details submitted to the site (for example, the products or services where interest is shown). Data subjects cannot be identified from this information, and it is only used to assist the Scheme in providing an effective service on this website. SAMWUMED may from time-to-time supply third parties with non-personal or aggregated data for uses in connection with this website.


3.3. Cookies Policy

The term “cookies” refers to cookies and other similar technologies covered by the POPI Act on privacy in electronic communications.

3.3.1. What is a cookie?

Cookies are small data files that browsers place on computers and devices. Cookies help browsers navigate a website and the cookies themselves cannot collect any information stored



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on computer or files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. In order to protect privacy, browsers only give websites access to the cookies that that have already been sent.

3.3.2. Why use cookies?

Cookies are used to learn more about the way our content is interacted with and helps SAMWUMED to improve the user experience when visiting our website. Cookies remember the type of browsers used and which additional browser software has been installed. Cookies also remember preferences, such as language and region, which remains as the default setting when revisiting the website. Cookies also allow the rating of pages and the filling in of comment forms. Some of the cookies used are session cookies and only last until browsers are closed, whereas others are persistent cookies which are stored on computers for longer.

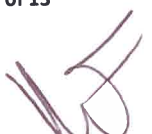
3.3.3. How are third-party cookies used?


For some of the functions on the SAMWUMED website, third party suppliers are used, for example, when visiting a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies and it is recommended to consult the policies of these third-party websites for information regarding their use of cookies.

3.3.4. How to reject and delete cookies?

3.3.4.1. SAMWUMED will not use cookies to collect personally identifiable information. However, if so desired, one can elect to reject or block the cookies set by SAMWUMED by changing the browser settings – see the Help function within the browser for further details. Please note that most browsers automatically accept cookies so it may be required to actively delete or block the cookies if you so desired.

3.3.4.2. www.allaboutcookies.org May be accessed for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to the



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handset manual. Note, however, that if the use of cookies is rejected, the SAMWUMED website may still be accessed but some of the functions may not work correctly.

4 How information is used

4.1. SAMWUMED may use Personal and Non-Personal Information only for the purposes for which it was collected and agreed upon, for example: –

- 4.1.1. To confirm and verify an identity or to verify authorised customers for security purposes.
- 4.1.2. To carry out our obligations arising from any contracts entered into between data subjects and SAMWUMED.
- 4.1.3. For notification regarding about changes to our service.
- 4.1.4. For market research purposes.
- 4.1.5. To assist with business development.
- 4.1.6. For the detection and prevention of fraud, crime, or other malpractice.
- 4.1.7. To conduct market or customer satisfaction research or for statistical analysis.
- 4.1.8. For audit and record keeping purposes.
- 4.1.9. In connection with legal proceedings.
- 4.1.10. SAMWUMED will use Personal Information to comply with legal and regulatory requirements or industry codes subscribed to, or that apply to the Scheme, or when it is otherwise allowed by law.
- 4.1.11. For monitoring and auditing site usage.
- 4.1.12. Evaluate the use of the site, products, and services.
- 4.1.13. Analyse the effectiveness of our advertisements, competitions, and promotions.
- 4.1.14. Personalisation of website experiences, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as the time visited, prior visitations and referral sites.
- 4.1.15. Make the site easier to use and to better tailor the site and Scheme products to suitable interests and needs.
- 4.1.16. Help speed up future activities and experiences on the site. For example, a site can recognise that Personal Information had already been provided and will not request the same information a second time.




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- 4.1.17. Collect information about the device used to view the site, such as IP addresses or the type of internet browser or operating system used, and link this to Personal Information so as to ensure that the site presents the best suitably tailored web experience.
- 4.1.18. To extend contact regarding products and services that may be of interest, provided that SAMWUMED has been consented to do so or that a product or service had been previously requested and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.
- 4.1.19. Suggest products or services (including those of relevant third parties) which we think may be of interest to users.
- 4.1.20. Offer the opportunity to take part in competitions or promotions.
- 4.1.21. The option exists opt out of receiving communications from SAMWUMED at any time. Any direct marketing communications sent by the Scheme shall provide the necessary information and means to opt out.
- 4.1.22. To respond to queries or comments.
- 4.1.23. Where SAMWUMED collects Personal Information for a specific purpose, it will not be kept for longer than necessary to fulfil that purpose, unless same must be kept for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when SAMWUMED deletes information from its servers, the Scheme may not immediately delete residual copies from its servers or remove information from our backup systems.

5 Disclosure of Personal Information

- 5.1. SAMWUMED may disclose Personal Information to our service providers who are involved in the delivery of products or services. SAMWUMED has agreements in place to ensure their compliance with these privacy terms.
- 5.2. SAMWUMED may share Personal Information with, and obtain information from: –
- 5.2.1. Third parties for the purposes listed above;
- 5.2.2. Other companies in the medical schemes industry when believed to enhance the services and products offered, but only if not objected to such sharing;



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5.2.3. Other third parties from whom data subjects have chosen to receive marketing information.

5.3. SAMWUMED may disclose information: –

5.3.1. Where it has a duty or right to disclose in terms of law or industry codes;

5.3.2. Where believed to be necessary to protect its rights.

6 Personal Information Security

6.1. SAMWUMED is legally obliged to provide adequate protection for the Personal Information held and to stop unauthorized access and use of personal information. SAMWUMED shall, on an ongoing basis, continue to review security controls and related processes to ensure that Personal Information is secure.

6.2. SAMWUMED's security policies and procedures cover: –

6.2.1. Physical security;

6.2.2. Computer and network security;

6.2.3. Access to personal information;

6.2.4. Secure communications;

6.2.5. Security in contracting out activities or functions;

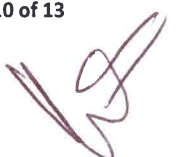
6.2.6. Retention and disposal of personal information;


6.2.7. Acceptable usage of personal information;

6.2.8. Governance and regulatory issues;

6.2.9. Investigating and reacting to security incidents.

6.3. When contracting with third parties, SAMWUMED imposes appropriate security, privacy, and confidentiality obligations on them to ensure that the Personal Information that the Scheme remains responsible for is kept secure.



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6.4. SAMWUMED shall ensure that anyone to whom Personal Information is passed onto agrees to treat such information with the same level of protection as we are obliged to.

7 Access to Personal Information

7.1. Data subjects have the right to request copies of the Personal Information held by SAMWUMED. In order to do this, simply contact SAMWUMED using the contact information provided on the home page and specify the information sought. SAMWUMED shall take all reasonable steps to confirm the identity of the requestor prior to the provision of any details pertaining to personal information.

7.2. Any such request for access may be subject to the payment of a legally permissible fee as provided for the SAMWUMED POPI Act Policy and/ or PAIA Manual.

8 Correction of Personal Information

8.1. Data subjects maintain the right to request updates, the correction of, or the deletion of their Personal Information. SAMWUMED shall take all reasonable steps to confirm the identity of the requestor prior to making any changes to Personal Information that may be held by the Scheme. It is the responsibility of all data subjects to ensure that the necessary steps are taken to ensure that Personal Information is kept accurate and up to date through notifying the Scheme of any changes that it should be aware of.

9 Definition of Personal Information


9.1. According to the POPI Act, "Personal Information" means information relating to an identifiable, living, natural person and where applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples, if required can be found at the following link: –

www.gov.za/documents/download.php?f=204368

10 The Right to Object

10.1. In terms of the POPI Act (POPIA) Section 18 (h)(iv), data subjects possess the right to object to the processing of personal information as referred to in Section 11(3) of POPIA.



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11 Right to Lodge a Complaint

11.1. In terms of the POPI Act (POPIA) Section 18 (h)(iv), data subjects possess the right to lodge a complaint to the Information Regulator (South Africa) (IRSA). The IRSA's contact details are as follows: –

<https://www.justice.gov.za/infoereg/contact.html>

33 Hoofd Street

Forum III, 3rd Floor

Braampark

PO Box 31533

Braamfontein, Johannesburg, 2017

Mr. Marks Thibela

Chief Executive Officer

Tel. No. +27 (0) 10 023 5207

Cell No. +27 (0) 82 746 4173

E-mail: infoereg@justice.gov.za


12 Changes to this Notice

12.1. Please be advised that this Notice may be amended from time to time. Kindly refer to the SAMWUMED website for periodical information on any changes. In terms of the POPI Act (POPIA) Section 18 (h)(iv), data subjects possess the right to object to the processing of personal information as referred to in Section 11(3) of POPIA.

13 How to contact us

13.1. Any queries regarding this Notice, alleged non-adherence hereto by SAMWUMED, further information required regarding SAMWUMED's privacy practices, submissions on withdrawals of consent, exercise of preferences or access to correct Personal Information, please proceed to contact the Scheme at the numbers/ addresses listed on the SAMWUMED website www.samwumed.org or refer to the information contained in the SAMWUMED PAIA Manual.



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PART C

Document History

Version	Date	Change description	Accepted	Total no. of pages
1	June 2021	Draft 1	Approved PO/ IO	10
2	June 2022	Draft 2	Approved PO/ IO	10
3	July 2023	Draft 3	Approved PO/ IO	13

Approval of Notice:

Principal Officer: SAMWUMED

The Notice becomes effective on date of Approval.



Ms. F Mosoeu

Principal Officer | SAMWUMED

29/06/2023
Date