



Surgical Navigation Technologies	
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POPI and Privacy Policy

1. Introduction

1. Overview

- Where **we** refer to “process”, it means how **we** collect, use, store, make available, destroy, update, disclose, or otherwise deal with personal information. As a general rule **we** will only process this personal information if it is required to deliver or offer a service, provide a product, carry out a transaction or obligation in a contract.
- **We** may combine this personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.
- If **you** use **our** other services, goods, products and service channels **you** agree that **we** may process this personal information as explained under this Privacy Policy. Sometimes **you** may provide **us** with consent to process this personal information.
- Surgical Navigation Technologies is a global organisation and as such this Privacy Policy will apply to the processing of personal information by any member of Surgical Navigation Technologies globally. If Surgical Navigation Technologies processes personal information for another party under a contract or a mandate, the other party’s privacy policy will apply to the processing of such information.
- Surgical Navigation Technologies can change this Privacy Policy from time to time if the law or **our** business practices requires such change.
- This policy establishes a general standard for the appropriate protection of personal information (POPI) within the Surgical Navigation Technologies environment furthermore, it provides principles regarding the rights of individuals to privacy and to reasonable safeguards of their personal information.

2. Scope

All employees, contractors, consultants, temporary and other workers at Surgical Navigation Technologies, including all personnel affiliated with third parties must adhere to this policy. This policy applies to information assets owned or leased by Surgical Navigation Technologies, or to devices that connect to a Surgical Navigation Technologies network or reside at a Surgical Navigation Technologies site.

2. Policy Statement

1. What is personal information?

Personal information refers to any information that identifies **you** or specifically relates to **you**, or **your** employees stored or processed on **The Product/s**. Personal information includes, but is not limited to, the following information about **you** and / or **your** employees:

- Marital status
- National origin
- Age
- Language
- Birth place
- Education
- Relevant financial history
- Identifying number (like an employee number, identity number or passport number)
- E-mail address; physical address (like residential address, work address or your physical location); telephone number
- Biometric information (like fingerprints, signature or voice)



- Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation
- Physical health; mental health; well-being; disability; religion; belief; conscience; culture
- Medical history; criminal history; employment history
- Personal views, preferences and opinions
- Another's views or opinions about you
- Full names and initials

Personal information includes special personal information, as explained below.

2. When will we process your personal information?

We will only process this 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

3. What is special personal information?

Special personal information is personal information about the following:

- Race (like where a company submits reports to the Department of Labour where the statistical information must be recorded)
- Ethnic origin
- Trade union membership
- Health (like where you apply for an insurance policy)
- Biometric information (like to verify your identity); and / or your criminal behaviour and alleged commission of an offense

4. 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 information is being used for any Human Resource or payroll related requirement
- 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

5. When and from where we obtain personal information about you

- **We** collect personal information from you directly.
- **We** may collect personal information from a public record or if you have deliberately made the information public.
- **We** collect personal information from 3rd parties that are directly integrated with **our** software platform
- **We** collect information about **you** based on **your** use of **our** products, services or service channels.
- **We** collect information about **you** based on how **you** engage or interact with **us** such as via emails, letters, telephone calls and surveys
- **We** collect personal information from completed forms i.e. contact and billing information

If the law requires **us** to do so, we will ask for **your** consent before collecting personal information. The third parties from whom **we** may collect **your** personal information include, but are not limited to, the following:

- **Our** partners, **your** employer, employees directly, any of **our** other Bureau or channel partners and any connected companies, subsidiary companies, its associates, cessionaries, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy;



- **your** spouse, dependents, partners, employer, and other similar sources;
- people **you** have authorised to share **your** personal information, like a person that makes a travel booking on **your** behalf or a medical practitioner for insurance purposes;
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- payment processing services providers, merchants, banks and other persons that assist with the processing of **your** payment instructions, like EFT transaction partners.
- insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes;
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
- trustees, Executors or Curators appointed by a court of law;
- **our** service providers, agents and sub-contractors like couriers and other persons **we** use to offer and provide products and services to **you**;
- courts of law or tribunals;

6. Reasons we need to process your personal information

We will process **your** personal information for the following reasons:

- to provide **you** with products, goods and services;
- to market **our** products, goods and services to **you**;
- to respond to **your** enquiries and complaints;
- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
- to conduct market and behavioural research, including scoring and analysis to determine if **you** qualify for products and services or to determine **your** credit or insurance risk;
- to develop, test and improve products and services for **you**;
- for historical, statistical and research purposes, like market segmentation;
- to process payment instruments;
- to create, manufacture and print payment advice;
- to enable **us** to deliver goods, documents or notices to **you**;
- for security, identity verification and to check the accuracy of **your** personal information;
- to communicate with **you** and carry out **your** instructions and requests;
- for customer satisfaction surveys, promotional offerings.
- to enable you to take part in and make use of value-added products and services;
- to assess our lending and insurance risks; and / or
- for any other related purposes.

7. How we use your personal information for marketing purposes

- **We** will use your personal information to market our services, related products and services to **you**
- **We** may also market non-banking or non-financial products, goods or 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

8. When, how and with whom we share your personal information

In general we will only share **your** personal information if any one or more of the following apply:

- If **you** have consented to this
- If it is necessary to conclude or perform under a contract **we** have with **you**
- If the law requires it; and / or



- If it's necessary to protect or pursue **your**, our or a third party's legitimate interests

Where required, each member of Surgical Navigation Technologies may share **your** personal information with the following persons. These persons have an obligation to keep **your** personal information secure and confidential.

- Other members of Surgical Navigation Technologies, its associates, cessionary, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy
- **Our** employees as required by their employment conditions
- Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements
- Payment processing services providers, merchants, banks and other persons that assist with the processing of **your** payment instructions, like 3rd party EFT service providers
- Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime
- Regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities and other persons the law requires **us** to share **your** personal information with
- **Our** service providers, agents and sub-contractors like couriers and other persons **we** use to offer and provide products and services to **you**
- Persons to whom **we** have ceded our rights or delegated our obligations to under agreements, like where a business is sold
- Courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- Trustees, Executors or Curators appointed by a court of law
- Participating partners in **our** customer loyalty reward programmes, where **you** purchase goods, products and service or spend loyalty rewards; and / or our joint venture and other partners with whom **we** have concluded business agreements, for **your** benefit

9. Under what circumstances will we transfer your information to other countries?

We will only transfer **your** personal information to third parties in another country in any one or more of the following circumstances:

- Where **your** personal information will be adequately protected under the other country's laws or an agreement with the third party recipient
- Where the transfer is necessary to enter into or perform under a contract with **you**, or a contract with a third party that is in **your** interest
- Where **you** have consented to the transfer; and / or
- Where it is not reasonably practical to obtain **your** consent, the transfer is in **your** interest

This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing **your** personal information in the other country will agree to apply the same level of protection as available by law in **your** country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

An example of **us** transferring **your** personal information to another country is where foreign payments take place if **you** purchase goods or services in a foreign country, or request that **we** facilitate salary payments to **your** employees in the countries.

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

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

You must inform **us** when **your** personal information changes.

Please refer to our Promotion of Access to Information Act 2 of 2000 Manual ([PAIA Manual](#)) for further information on how **you** can give effect to the rights listed below.

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. Please refer to our PAIA Manual for further information in this regard, like the process **you** should follow to give effect to this right. 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** 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**.

You must inform **us** of any objection in writing. Please refer to **our** PAIA Manual for further information in this regard, like the process **you** should follow to give effect to this right.

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** 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.

11. 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 international security standards

12. 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 to **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
- Note: **We** may keep **your** personal information even if **you** no longer have a relationship with **us**, for the historical data that may be required by **your** employer or employee.

13. Children's Privacy

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Surgical Navigation Technologies with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

14. 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.

1. References

Document Name
Information Classification Policy
PAIA Manual

2. Outputs

The following records need to be kept and stored securely.

Record	Responsible Person	Retention	Disposition

All records must be stored in the pre-allocation location. All physical copies need to be stored in a lockable cabinet or drawer.

3. Enforcement

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. A violation of this policy by a temporary worker, contractor, or vendor may result in the termination of their contract or assignment with Surgical Navigation Technologies.

Any exception to the policy must comply with the **Exceptions Policy**.



CEO name Colin Grenfield CEO signature 

Signed at Johannesburg on this 30 day of June 2021