



## WWW.SASPINE.ORG – PRIVACY POLICY

### 1.1 Introduction

- 1.1.1 We recognise the importance of protecting your privacy in respect of your personal information (as this phrase is defined in POPI) collected by us when you use this Website.
- 1.1.2 In adopting this Privacy Policy, we wish to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your personal information. However, we do not guarantee that your personal information shall be 100% secure.
- 1.1.3 Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify you and the Information Regulator which is appointed in terms of POPI. We will delay notifying you of the unauthorised access or acquisition of your personal information if a public body responsible for detection, prevention or investigation of offences or the Information Regulator informs us that notifying you will impede a criminal investigation. When we notify you of the compromise to the security of your personal information we will provide you with sufficient information to allow you to take protective measures against the potential consequences of the compromise.

### 1.2 Your agreement in relation to your personal information

- 1.2.1 As per the [WWW.SASPINE.ORG TERMS AND CONDITIONS](#), by continuing to use this Website:
  - 1.2.1.1 You agree to the terms and conditions set out in this Privacy Policy. If you do not agree with this Privacy Policy, please do not continue to use the Website and/or the Services; and
  - 1.2.1.2 You agree that we may "collect, collate, process and/or store" your personal information (as this term is defined in POPI) ("Process") for, amongst other things, (i) the purposes of providing you with access to the Services, Website and the Website Content; and (ii) for any of the purposes listed at clause 1.6 below.
- 1.2.2 We reserve the right to vary the terms of this Privacy Policy in accordance with paragraph 16.2 of the [WWW.SASPINE.ORG TERMS & CONDITIONS](#).
- 1.2.3 It is your responsibility to familiarise yourself with the most recent version of this Privacy Policy each time you access the Website.

### 1.3 What types of personal information do we Process?

- 1.3.1 The types of personal information that we may Process includes information necessary for our legitimate business interest and the categories of personal information identified in POPI. This may include (amongst other things):
  - 1.3.1.1 In the case of SASS Members (all Categories): your name and details as per the application form, your congress attendance record, your yearly payment of membership fees;
  - 1.3.1.2 In the case of Congress Delegates: your name and identity number, e-mail and physical addresses, postal address, contact information, information relating to your, age, views or preferences and the pages of the Website viewed by you;
  - 1.3.1.3 In the case of other Healthcare Professionals applying for membership: your name and identity number, e-mail and physical addresses, postal address, contact information, information relating to your, age, details relating to your medical practice, and your registration details at the Health Professions Council of South Africa, views or preferences and the pages of the Website viewed by you;
  - 1.3.1.4 In the case of Sponsors or Exhibitors: your company name, e-mail and physical addresses, postal address, contact information, contact person with their respective details (name, email, contact number).
- 1.3.2 We will limit the types of personal information we Process to only that to which you consent and which is necessary for our legitimate business interests.

## 1.4 When will we Process your personal information?

1.4.1 Personal information may be Processed by us in several ways, including, when:

- 1.4.1.1 you register to make use of the Services on the Website;
- 1.4.1.2 you register to receive any notifications from us in respect of our Email Authentication Service and/or our Text Message Authentication Service;
- 1.4.1.3 you make use of the Services;
- 1.4.1.4 we carry out demographic research; and
- 1.4.1.5 you browse the Website.

1.4.2 You acknowledge that all personal information Processed by us may be stored by us and used for any of the purposes listed in clause 1.6 below.

## 1.5 How do we Use your personal information?

1.5.1 We may use your personal information:

- 1.5.1.1 to provide notifications for congresses or meetings;
- 1.5.1.2 to participate in surveys around medical issues;
- 1.5.1.3 to send communications regarding administrative and financial issues;
- 1.5.1.4 to manage the exhibitor and delegate information during congresses;
- 1.5.1.5 to manage the members information in relation to fees and congress attendance;
- 1.5.1.6 to retain and make available to you medical information on the Website as part of the Services;
- 1.5.1.7 as a health care professional, to check that you are duly registered with the Health Professions Council of South Africa ("HPCSA");
- 1.5.1.8 to verify your identity on the Website;
- 1.5.1.9 for security, administrative and legal purposes;
- 1.5.1.10 for customer relations; and
- 1.5.1.11 for helping us in any future dealings with you.

## 1.6 Sharing of your personal information

1.6.1 We will not disclose any of your personal information to third parties, except when we have your permission to do so, in terms of the purpose regarding the services provided by [www.saspine.org](http://www.saspine.org) (i.e. locating a healthcare practitioner, speciality, practice name, contact details, and other information required for this purpose.) or where we are required to do so in terms of law.

1.6.2 You agree that your de-identified aggregate personal information may be shared under the following circumstances:

- 1.6.2.1 to monitor web traffic: web servers serving the Website automatically collect information about pages you visit. This information is used for internal review, to tailor information to individual visitors and for traffic audits. This information (as well as information from third-party market researchers), on an aggregated, anonymous basis, is
- 1.6.2.2 government and law enforcement agencies, where the law requires that we disclose your personal information to a party, and where we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a party who may be in breach of the Website Terms or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities.

## 1.7 Who will have access to your personal data?

1.7.1 Your personal data will only be accessed by the relevant authorised persons:

- 1.7.1.1 The Congress Organiser regarding these events.
- 1.7.1.2 SASS Membership and Web Management.
- 1.7.1.3 Database Developer.

## 1.8 What will happen with your personal data?

- 1.8.1 Delegates Details are stored according to yearly congresses, members attendance logs and transferred to the "Member Only" section. Non-members are stored or archived depending on yearly participation or to be notified of future SASS congresses.
- 1.8.2 Sponsors Contact Details are stored as per "Business Card" to be used to notify companies about the next Congress.
- 1.8.3 Members Details are stored as per "Member Categories" and archived if they are suspended or resigned.
- 1.8.4 We store your Personal Information on the Database of Virtually Clear. Separate copies of these records may be kept by the Membership Administrator on a separate storing device and files. We may also or alternatively store your Personal Information on and transfer your Personal Information to a central database located in the SQL Database server. If the location of the central database is located in a country that does not have substantially similar laws which provide for the protection of Personal Information, we will take the necessary steps to ensure that your Personal Information is adequately protected in that jurisdiction.
- 1.8.5 Regarding the duration of data storage, [www.saspine.org](http://www.saspine.org) will store data included in the database indefinitely as the purpose described in this policy may include re-participation or re-application.
- 1.8.6 Non-active delegates / delegates / companies are archived and may be retrieved, re-instated and restored upon certain conditions for the latter.

## 1.9 Your rights

- 1.9.1 You have the right to request, that we correct, destroy, remove from public view, delete, archive or update any of your personal information that we have Processed in accordance with these Terms. The personal information that you may request us to correct, destroy, delete, archive or remove from public view and updated is personal information that has been Processed in accordance with these Terms that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain.
- 1.9.2 You have the right to withdraw your consent for us to Process your personal information at any time. The withdrawal of your consent can only be made by you on the condition that the withdrawal of your consent does not affect the Processing of your personal information before the withdrawal of your consent; or that the withdrawal of your consent does not affect the Processing of your personal information if the Processing is in compliance with an obligation imposed by law on us; or that the withdrawal of your consent does not affect the Processing of your personal information where such Processing is necessary for the proper performance of a public law duty by a public body; or that the withdrawal of your consent does not affect the Processing of your personal information as required by law; or that the withdrawal of your consent does not affect the Processing of your personal information as required to finalise the performance of a contract in which you are a party; or that the withdrawal of your consent does not affect the Processing of your personal information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.
- 1.9.3 You have the right to object to the Processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law. You can make the objection if the Processing of your personal information is not necessary for the proper performance of a public law duty by a public body; or if the Processing of your personal information is not necessary to pursue your legitimate interests; our legitimate interests or the legitimate interests of a third party the information is supplied to.
- 1.9.4 You have the right to object to the Processing of your personal information, at any time, if the Processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that Processing.
- 1.9.5 You have the right to not have your personal information Processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- 1.9.6 You have the right not to be subjected, to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you. Decisions that you may not be subjected to are decisions that result in legal consequences for you or affect you to a substantial degree without taking appropriate measures to protect your legitimate interests; without being for the execution of a contract that you have received performance for; or decisions made that are not in terms of law or of a code of conduct that specifies what appropriate measure must be taken to protect your legitimate interests.

- 1.9.7 You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of personal information Processed in accordance with these Terms. The Information Regulator's contact details will be published by the Government in due course in terms of POPI. When they are published POPI places a duty on us to inform you what those contact details are and we will do so.
- 1.9.8 You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information Processed in accordance with these Terms.

#### 1.10 Security

- 1.10.1 [www.saspine.org](http://www.saspine.org) uses all reasonable measures to protect the data from unauthorized access, hacking, cyber-spying, malware, data corruption, abuse and all similar threats to the security of the data. [www.saspine.org](http://www.saspine.org) has agreements in place with service providers to not only protect the confidentiality and integrity of the data, but also to ensure that adequate levels of security are maintained. In spite of these steps no absolute guarantee can be made in relation to [www.saspine.org](http://www.saspine.org) being safe from all hacking, free from crashing or other system errors, etc.
- 1.10.2 [www.saspine.org](http://www.saspine.org) is hosted on a server accessible via a webpage, protected by Digicert EV SSL Secure at Virtually Clear and Hetzner, set up to have multi-level security access built into the system.
- 1.10.3 It is the responsibility of every member with log-in access to ensure that their log-on details are kept safe. [www.saspine.org](http://www.saspine.org) cannot be held responsible if users share these with third parties and confidentiality is subsequently violated. Such violations are offences under privacy legislation and could also lead to legal action and/or ethics complaints at the HPCSA.