

Privacy Statement - How we will process and disclose your Personal Information and communicate with you

Definitions

The Scheme refers to Anglovaal Group Medical Scheme, registration number 1571, registered with the Council for Medical Schemes.

Administrator refers to Discovery Health (Pty) Ltd, registration number 1997/013480/07, an authorised financial services provider.

Competent person means anyone who is legally competent to consent to any action or decision being taken for any matter concerning a member or dependant, for example a parent or legal guardian.

Discovery Group refers to Discovery Limited, registration number 1999/007789/06, including all subsidiaries of the Group. Subsidiaries in the Group are authorised financial services providers.

Process(ing) (of) information means the automated or manual activity of collecting, recording, organising, storing, updating, distributing and removing or deleting personal information.

We or our or us refers to the Scheme.

You or your refer to the member and your registered dependants on your medical scheme plan.

Your personal information refers to personal information about you, your spouse, your dependants, your beneficiaries, and your employees (as relevant). It includes information about health, financial status, gender, age, contact numbers and addresses.

1. When you engage with the Scheme and Administrator, you trust us with personal information about yourself, your family, and in some cases, your employees. We are committed to protecting your right to privacy.
2. The purpose of this Privacy Statement is to set out how we collect, use, share and otherwise process your personal information, in a manner that is compliant, ethical, and adheres to industry best practice and applicable protection of personal information legislation as enacted from time to time.
3. We have a duty to take all reasonably practicable steps to ensure that your personal information as processed by us is complete, accurate, not misleading, and updated on a regular basis. To enable this we will always endeavour to obtain personal information from you directly. Where we are unable to do so, we will make use of verifiable independent third party data sources.
4. You have the right to object to the processing of your personal information and have a choice whether or not to accept these terms and conditions. However, it is important to note that the Scheme and Administrator require your acceptance of these terms and conditions otherwise we cannot activate and service your medical scheme membership.
5. The Scheme and Administrator will keep your personal information confidential. You may have given us this information yourself, or we may have collected it from other sources. If you share your personal information with any third parties, we will not be responsible for any loss suffered by you or your employer (where applicable).
6. You understand that when you include your spouse and/or dependents on your application, we will process their personal information for the activation of the policy/benefit and to pursue their legitimate interest. By submitting your dependants' relevant personal information, you hereby confirm that you are duly authorised to share such information with us. We will furthermore process their information for the purposes set out in this Privacy Statement.



7. Each party accepts responsibility to the extent that the processing activities of personal information fall under the control of that party and agrees to indemnify the other party/ies against any loss or damage, direct or indirect, that an employee may suffer because of any unauthorised use of the employees' personal information or of a breach of the employees' personal information occur, but only if the processing of that personal information is controlled by that party.
8. If you are giving consent for a person under 18 (a minor) you confirm that you are a competent person and that you have authority to give their consent for them.
9. You agree that the Scheme and Administrator may process your personal information for, inter alia, the following healthcare purposes:
 - i. for the processing and activation of your application for membership; for the administration of your health plan;
 - ii. for the provision of managed care services to you on your health plan;
 - iii. for the provision of relevant information to a contracted third party who requires this information in order to provide a healthcare service to you on your health plan;
 - iv. to analyse risks, trends and profiles ;
 - v. to share your personal information with external health providers for the purposes of evaluating certain clinical information, in the event that you require medical treatment;
 - vi. to share your information with relevant regulatory bodies.
 - vii. to investigate and/or remedy fraud, waste and abuse.

Examples of this include:

- i. Obtaining and sharing your personal information from and with other relevant sources, including medical practitioners and contracted service providers; health information exchanges; and further processing of such information to consider your membership application, to conduct underwriting or risk assessments, or to assess and value a claim for medical expenses. We may (at any time and on an on-going basis) verify with the relevant sources that your personal information is true, correct and complete;
 - ii. If you have joined as a member of an employer group, getting information from and sharing information with your employer that is relevant to your application for membership with due regard to considerations of confidentiality in respect of your state of health;
 - iii. Communicating with you about any changes in your health plan, including changes to your contributions or changes to the benefits you are entitled to on your health plan.
10. If a third party asks the Scheme and Administrator for any of your personal information, we will share it with them only if:
 - i. you have already given your consent for the disclosure of this information to that third party; or
 - ii. we have a legal or contractual duty to give the information to that third party; or
 - iii. we need to share it with them for risk analytical or fraud detection, prevention or recovery purposes.
 11. You consent and agree that:
 - we may process your information, including personal and special personal information, to adhere to South African Legislative reporting obligations and to perform transaction monitoring activities;



- we may communicate such personal information to local Regulatory Bodies if any Legislative reportable matters are identified.
12. The Scheme and the Administrator may provide your personal information to any other entity within the Discovery Group with whom you or your dependant/s already have a relationship, or where you or your dependant/s have applied for a product, service or benefit from such entity, in both cases only where you have given your consent to such other entity to obtain information from the Scheme or the Administrator. This information will be provided for the administration of your or your dependant/s products or benefits with other entities within the Discovery Group, and for fraud detection, prevention or recovery purposes.
 13. You may opt out of Electronic Marketing on www.avgms.co.za. We will store your personal information for purposes of actioning this request and action it as soon as reasonably possible.
 14. The Scheme and Administrator may share and combine all your personal information for any one or more of the following purposes:
 - market, statistical, and academic research; and
 - to customise our benefits and services to meet your needs.

Information about you may be shared with third parties such as academics and researchers, including those outside South Africa. We ensure that all data about you that is shared with such third parties will be made anonymous to the extent possible and where appropriate. Note also that personal information will be made available to such third party only if that third party has agreed to abide by strict confidentiality protocols that we require. If we publish the results of any academic research, you will not be identified by name.

If we want to share your personal information for any other reason, we will do so only with your permission.
 15. By accepting this privacy statement, you authorise the Scheme and Administrator to obtain and share information for purposes of risk analysis, tracing, and any related purposes.
 16. The Scheme and Administrator have the right to communicate with you electronically about any changes to your health plan, including changes to your contributions or changes to the benefits you are entitled to on your health plan.
 17. We may process your information using automated means (without human intervention in the decision making process) to make a decision about you or your application for any product or service. You may query the decision made about you.
 18. The Scheme and Administrator have a duty to keep you updated about any offers relevant to you that are made available from time to time. The Scheme and Administrator may communicate with you about these.
 19. You have the right to know what personal information the Scheme and Administrator holds about you. If you wish to receive this information please complete an 'Access Request Form', attached to the PAIA manual, on www.avgms.co.za and specify the information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information. We are entitled to charge a fee for this service and will let you know what it is at the time of your request.
 20. You agree that the Scheme and Administrator may keep your personal information until you ask us to delete or destroy it. You have the right to ask us to update, correct or delete your personal information, unless the law requires us to keep it. Where we cannot delete your personal information,



we will take all practical steps to de-personalise it.

21. Where the Scheme and Administrator are required by law to collect and keep personal information, we shall do so. We are required to collect and keep personal information in terms of the following laws:

- Medical Schemes Act, 1998
- The Consumer Protection Act, 2008
- The Protection of Personal Information Act, 2013
- Electronic Communications and Transactions Act, 2002
- Promotion of Access to Information Act, 2002

Legislation specific to Discovery Health (Pty) Ltd only:

- Financial Advisory and Intermediary Services Act, 2002
- Companies Act, 2008

22. You agree that the Scheme and Administrator may transfer your personal information outside South Africa:

- if you give us an email address that is hosted outside South Africa; or
- for processing, storage or academic research; or
- to administer certain services, for example, cloud services.

When we share your information with a person (or company) outside South Africa, we will require of such person (or company) to treat your information in a manner that complies with the requirements of that country and at least with the same level of protection as we are obliged to do in South Africa. If the Scheme becomes involved in a proposed or actual amalgamation or merger, acquisition or any form of sale of any assets, we have the right to share your personal information with third parties in connection with the transaction. In the case of such an event, the new entity will have access to your personal information. The terms of this Privacy Statement will continue to apply.

23. The Scheme or Administrator may change this Privacy Statement at any time. The current version is available on www.avgms.co.za.

24. If you believe that the Scheme or Administrator have used your personal information contrary to this Privacy Statement, we encourage you to first follow our internal complaints process to resolve the complaint. We explain the complaints and disputes process on the website. Contact details for the Information Regulator:

The Information Regulator (South Africa)
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