

# Privacy Policy

## Privacy Policy

*Updated 30 June 2021*

### Introduction

Immunopaedia Foundation (Non-Profit Company, Registration No: 2019/439575/08, PBO Reference No: 930071372) ("**Immunopaedia**", "**us**" and "**we**") is committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy policy, or our practices with regards to your personal information, please [Contact Us](#). We therefore implement business practices that comply with applicable data protection laws, including the Protection of Personal Information Act 4 of 2013 ("**POPIA**").

When you visit our website <https://www.immunopaedia.org.za> (the "**Website**"), and use any of our services (the "**Services**", which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use and protect it and what rights you have in relation to it. Please read through this privacy policy carefully, as it is important and applies to your use of the Website and Services. If there are any terms in this privacy policy that you do not agree with, please discontinue your use of our Website and Services immediately.

This privacy policy applies to all information collected through our Services (which includes our Website), as well as, any related services, sales, marketing or events. Where we refer to "**personal information**" in this policy, we mean personal information as defined in POPIA, being information that may be used to directly or indirectly identify you. Personal Information includes, for example, a data subject's

name, email address, identity number (or company registration number), contact details, photograph, professional and educational information, and location.

**“You”** means any natural or legal person (a data subject) whose personal information we process. Additional terms will also apply to our relationship when you register to use the Services (becoming a **“User”**) and accepting the terms and conditions applicable to Users (the **“Terms and Conditions”**). The terms of this policy will prevail if there is any conflict between this policy and the Terms and Conditions. We may change the terms of this policy and will always process personal information in accordance with the latest version.

In terms of POPIA, Immunopaedia processes information as a **responsible party** for the purposes of managing our relationship and offering our Services. We also process certain personal information as a responsible party when someone uses the Website (even if they are not a registered User), and we may process personal information as an **operator** where we process information on the instructions of our clients or partners (where they are the responsible party). Parts of this policy will apply to you if you are a User or before you become a User.

## **WHAT INFORMATION DO WE COLLECT?**

### **a) Personal information you disclose to us**

***In Short:** We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Website, complete a quiz in a course or case study (using Google Forms), contact us, apply for a course online or subscribe to our newsletter.

The personal information that we collect depends on the context of your interactions with us and the Website, the

choices you make and the products and features you use. The personal information we collect may include the following:

- **General personal information.** Such as names; email addresses; usernames; passwords; HPCSA and SACNASP numbers; institution/company; nationality and country; professional and education information, and other similar information.
- **Communication information.** Personal information included in correspondence from Users.
- **Consent records.** Records of any consents you have given us in respect of using your personal information and any related information, such as the specific details of the consent. We will also record any withdrawals or refusals of consent.
- **Transaction and payment details.** Transaction records, payment method, payment amount, and related information.
- **Content and advertising data.** Records of your interactions with our online advertising on the various websites which we advertise and records relating to content displayed on webpages displayed to you.
- **Views and opinions.** Any views and opinions that you choose to share with us, or publicly post about us on social media platforms or elsewhere.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

#### **b) Information automatically collected**

***In Short:** Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our Website.*

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information)

but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes, as described in our Cookie Policy.

## **CHILDREN'S PERSONAL INFORMATION AND SPECIAL PERSONAL INFORMATION**

Our Services are not intended for children, and therefore we do not intentionally collect or use children's personal information, and will not do so without the consent of a parent or guardian of the child. We will only collect and process special / sensitive personal information that you have voluntarily provided to us with your consent or if allowed by POPIA.

## **HOW DO WE USE YOUR INFORMATION?**

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes on the basis of our legitimate business interests, to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive to:

- Contact Users about quiz results, courses and CPD points, to operate and manage our relationship with you.

- To protect and develop our Services. We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention) and to carry out market research and surveys, business and statistical analysis and necessary audits.
- To send administrative information to you. We may use your personal information to send you product, Service and new feature information and/or information about changes to our terms, conditions, and policies.
- To perform other administrative and operational tasks like testing our processes and systems and ensuring that our security measures are appropriate and adequate, and to comply with our regulatory, legal or other obligations.

## SHARING OF PERSONAL INFORMATION

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.*

We may process or share your data that we hold based on the following legal bases:

- **Consent:** We may process and share your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process and share your data when it is reasonably necessary to achieve our legitimate business interests.
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

- **To perform in terms of our contract with you:** We may disclose data to our business partners or third party processors to provide you with the Website, and/or our Services, this includes data storage service providers, third party software/platform providers in terms of written agreements with these parties.
- **If required by law:** We may disclose data to legal and regulatory authorities, upon their request, or for the purposes of reporting any breach of applicable law.

We share and disclose your information with the following categories of third parties. If we have processed your data based on your consent and you wish to revoke your consent, please [Contact Us](#).

- Performance Monitoring Tools
- User Account Registration & Authentication Services
- Website Hosting Service Providers Security Services
- Business partners that we offer courses with
- Legal and professional advisors

If we engage third party operators (sub-contractors) to process personal information, the operators will be appointed on a written agreement which will require the operators to only process personal information on our written instructions, use appropriate measures to ensure the confidentiality and security of personal information and comply with any other requirements set out in the agreement and required by POPIA.

## **RETENTION OF INFORMATION**

We retain personal information in accordance with the required retention periods in POPIA, applicable laws or for legitimate business purposes and with your consent. We will only retain your personal information for the purposes explicitly set out in this policy or in accordance with your consent. We retain your personal information supplied through registration, contact forms, course registration forms and quiz forms

indefinitely. This is kept secure and is used to analyse data for use on our Website. We may also keep personal information indefinitely with your consent, or in a de-identified format for statistical purposes, which may include for example statistics of how you use the Website and Services. This policy also applies when we retain your personal information.

## **SECURITY OF INFORMATION**

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process against accidental or unlawful destruction, loss, alteration, disclosure, access and other unlawful or unauthorised forms of processing. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

We will report any breach of personal information to the applicable regulatory authority in terms of POPIA and to the persons whose personal information is involved in the breach. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your personal information, kindly notify us by sending an email to [webmaster@www.immunopaedia.org.za](mailto:webmaster@www.immunopaedia.org.za)

## **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

Due to the nature of our services and our business being

established in different countries, we may need to transfer personal information to and from different countries for our business purposes.

We will only transfer personal information to third parties in countries with adequate data protection laws or do so in terms of a written agreement with the recipient which imposes data protection requirements on that party as required by POPIA.

Please note that when you transfer any personal information directly to a third party in another country (i.e. we do not send your personal information to the third party), we are not responsible for that transfer of personal information (and that transfer is not based on or protected by this policy). Any personal information that we receive from a third party country will nevertheless be processed in terms of this policy.

## **WHAT ARE YOUR PRIVACY RIGHTS?**

***In Short:** You have rights that allow you access to and control over your personal information. You may review, change, or terminate your account at any time.*

You have certain rights in relation to your personal information. As available and except as limited under POPIA or other applicable laws, you have the following rights in respect of your personal information:

1. **right of access:** the right to be informed of and request access to the personal information that we process about you;
2. **right to rectification:** you may request that your personal information be amended or updated where it is inaccurate or incomplete;
- **right to erasure:** the right to request that we delete your personal information, subject to applicable limitations and exceptions;



1. **right to restrict processing:** you may request that we temporarily or permanently stop processing your personal information;
2. **right to object:**
  1. you may object to us processing your personal information; and
  2. to your personal information being processed for direct marketing purposes;
3. **right not to be subject to automated decision-making:** where a decision that has a legal or other significant effect is based solely on automated decision making, including profiling, you may request that your personal information not be processed in that manner.

Where you have provided consent for us to process your personal information, you may also withdraw your consent where our processing is based on your consent. We may however your personal information if another legal justification exists for the processing.

**Account information and access.** If you would at any time like to review or change the information in your account or terminate your account, you can: log in to your account settings and update your user account or [Contact Us](#). Subject to applicable laws, on your request, we will deactivate or delete your account and/or information from our active databases.

**Objection to processing.** You may, on reasonable grounds, object to us using your personal information for certain purposes. If you object, we will stop using your personal information, except if POPIA or applicable laws allow its use. To exercise this right or to discuss it with us, please contact us on [webmaster@www.immunopaedia.org.za](mailto:webmaster@www.immunopaedia.org.za)

## **DIRECT MARKETING**

We may process your personal information to contact you to

provide you with information regarding our Services that may be of interest to you. Where we provide Services to you (where you are a customer of ours), we may send information to you regarding our Services and other information that may be of interest to you, using the contact details that you have provided to us. We will only send you direct marketing communications where you have consented to us sending you direct marketing, or about our Services, or otherwise in compliance with POPIA.

You may unsubscribe from any direct marketing communications at any time by clicking on the unsubscribe link that we include in every direct marketing communication or by contacting us and requesting us to do so.

After you unsubscribe, we will not send you any direct marketing communications, but we will continue to contact when necessary in connection with providing you with the Services or in connection with our business.

## **LINKS ON OUR WEBSITE**

Our Website may include links to third party websites which do not fall under our supervision. We aren't responsible for your privacy or the content of these third party sites, but we display these links in order to make it easier for you to find information about specific subjects. **Your use of and reliance on these links is at your own risk.**

## **UPDATES TO THIS PRIVACY POLICY**

***In Short:** We will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. We encourage you to review this privacy policy frequently to be informed of how we are protecting your

information.

## **HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this policy, you may email us at [webmaster@www.immunopaedia.org.za](mailto:webmaster@www.immunopaedia.org.za) or by post to: Immunopaedia Foundation 1 Anzio Rd, Observatory, Cape Town, Western Cape 7925 South Africa.

## **LOGGING A COMPLAINT**

If you want to raise any objection or have any queries about our privacy practices, you can contact our data protection officer on [webmaster@www.immunopaedia.org.za](mailto:webmaster@www.immunopaedia.org.za)

You also have the right to formally lodge a complaint to the relevant supervisory authority with the following contact details:

### **Information Regulator:**

- Website: <https://www.justice.gov.za/infoereg/>
- Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Postal address: P.O Box 31533, Braamfontein, Johannesburg, 2017
- Complaints email: [IR@justice.gov.za](mailto:IR@justice.gov.za).
- General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)