

PRIVACY POLICY: ICON (PTY) LTD

1. Our commitment to all those whose health care related information we process:

We respect the privacy of your personal information.

We understand that in today's interconnected world you may be concerned about what happens with your personal information. Your personal information may include clinical, financial and demographic components. We believe in transparency and have implemented this privacy policy to inform you about how we go about collecting personal information from you, the type of information we collect, why we collect that information, the circumstances under which that information will be shared with others, the security measures we've put in place to protect personal information and the mechanisms we've implemented to give you control over your information.

2. Who are we?

We are ICON, a health care company, registered in South Africa under reg. no. 2015/27977/07. ICON is improving the quality of patient care in Africa, by aligning medical specialists and funders and applying proprietary, evidence-based protocols and systems.

3. How do we collect your information?

We use an authorisation system that collects treatment plans. Treatment plans are detailed descriptions of the clinical elements that the treating doctor proposes to use in the treatment of your condition. Treatment plans are sent on to your medical scheme for funding authorisation. All patient information that is required in order to make a clinically appropriate funding decision is captured and stored. The information included would be that provided by you to your ICON registered doctor or shared with your doctor by a doctor who previously treated you for an associated condition.

We may also acquire your healthcare claims data from your medical scheme where your medical scheme is contracted to ICON Pty Ltd.

4. What personal information do we process?

We process personal information about your health status and appropriate demographic information like age, gender, race and town of residence.

The information we process about your health, includes the diagnosis, clinical information about the treatment and care, prescribed medicines, frequency of treatment, test results and other relevant conditions.

5. Why do we process your information?

Our primary reason for processing your information is to monitor quality of care. This is to make sure that the right patients are getting the right treatment at an affordable cost. In doing so we are able to constantly challenge the care model by comparing its performance against published literature and the clinicians experience. We call this evidence based practice. In this way we are able to ensure your access to the best possible care you can afford.

In processing the clinical data, your personal data is always anonymised and aggregated (grouped together with other patient data and reported as population data). Anonymity during the processes involved in internal analysis and when reporting on results to contributing clinicians or client medical schemes is also ensured.

6. Will we share your information with anyone else?

In order for ICON to perform its role effectively we do share your information. This is done in an ethical manner and in strict compliance with the law.

We share your treatment data with your medical scheme in order to make a funding decision. In all other instances where we share your data it is always anonymised and shared for the purposes of clinical treatment risk/performance evaluation. In these instances, we share your data with our principal collaborators, and partners: your ICON affiliated doctor and affiliated medical scheme or medical administrator. Where ethically appropriate we might also share aggregated data with pharmaceutical manufacturers or pharmaceutical distributors in order to ensure better access to care for all patients now and in the future.

We will not provide your information to any third party on any terms other than those set out in this policy. Your identity will at all times be secured, ensuring that you are only identifiable to clinicians who are directly involved in your healthcare service delivery. Your doctor will always provide the care required irrespective of the data being used.

7. Does this policy apply to children?

Yes, but parents or guardians must give us permission before we process personal information about children.

8. How do we protect your information?

We continually review and update our data protection measures to ensure the security, integrity, and confidentiality of your information in accordance with industry best practices. The measures we adopt to ensure the security of your personal information include technical measures and internal policies to prevent unauthorised access, loss or use of personal information.

Only those employees and service providers that require access to your information to undertake work relating to our applications will be permitted access to your information. This access will be subject to the conclusion of an agreement with us requiring them to implement appropriate security measures and to maintain the confidentiality of your information.

We will inform the Information Regulator if someone unlawfully obtains access to any personal information we process.

9. Where is your information stored?

We will store your personal information within South Africa and will not transfer your personal information across the borders of the Republic of South Africa. If we have to transfer the information to a third party in another country, we will ask your consent before we do so. Anonymised and aggregated data may be presented in forums where international delegates are present.

10. How can you control your information?

You may request that we confirm the details of information that do we hold about you and that we provide details of the third parties we've supplied your information to, by contacting us on the following telephone number: 021 944 3750. You may also request that we correct or delete any information and you can object to the continued processing of your information. If you exercise your

right to object or if you withdraw your consent and if the circumstances make it reasonable for us to do so, we may suspend our services to you. This should in no way impact the care provided to you by your clinician.

If you believe we have processed your information in a manner contrary to this privacy policy or in contravention of the law, you may lay a complaint with the Information Regulator.

11. Publications and research

Your anonymised personal data, is recorded in a registry. This registry may be used periodically in order to provide data on disease risk or trends in South Africa. Publications are vetted by an ethics committee in accordance with ethical principles and guidelines so as to ensure your rights are not compromised in any way.

12. Changes to this policy

We sometimes update this policy, and we'll notify you about any changes through your affiliated doctor's practice as well as via our website. It is your responsibility to make sure you're satisfied with any changes before continuing to use our services.

