

PRIVACY POLICY

Please read this Privacy Policy carefully to understand how your personal information will be processed by the Icon Group of Companies. Every term of this Policy is material.

1. About the Icon Group of Companies

The Icon Group of Companies ('the Icon Group') facilitates the provision of oncology treatment of patients at various oncology treatment facilities and provide managed care oncology services. Various Icon Group companies provide support services to the treatment facilities and practitioners who provide treatment at these facilities.

2. Icon Group of Companies Covered by this Privacy Policy

This Privacy Policy applies to

- Icon Oncology Holdings (Pty) Ltd (registration number 2015/254381/07) and all its subsidiaries and associates (a list of the entities can be provided on request).

The contact details of the various group companies and oncology treatment facilities operated by the Icon Group are available on <https://iconsa.co.za/>.

3. Information and Deputy Information Officers

The details of Information and Deputy Information Officers of all the various group companies are contained in the relevant PAIA manuals available on <https://iconsa.co.za/>.

4. Explanation of Terms

4.1 **"Data subject"** refers to the person or entity to whom the personal information relates.

4.2 **"Icon Group" or "the Icon Group of Companies"** refers to the entities listed above as the context requires.

4.3 **"Personal information"** has the meaning assigned to it in POPIA and refers to information relating to human beings and certain juristic persons. It includes information such as race, gender, pregnancy, age, health status and medical information, date of birth, identity number, contact details and confidential correspondence.

4.4 **"Processing"** has the meaning assigned to it in POPIA and refers to any operation or activity concerning personal information, such as the collection, receipt, recording, storage, updating, alteration, use, distribution, erasure or destruction of the information.

4.5 **“POPIA”** means the Protection of Personal Information Act (Act 4 of 2013) and its Regulations.

4.6 **“Website”** means the internet website with the address <https://iconsa.co.za/> and any website with a URL that is validly registered to Icon.

4.7 **“We” / “us”** refers to the Icon Group or the Icon Group of Companies or any of the entities listed in paragraph 2 above as may be required in the context.

4.8 **“You” / “your”** refers to the data subject (i.e., the person or entity) whose personal information is processed by the Icon Group.

5. Application of the Privacy Policy

This Privacy Policy applies to personal information that we have in our possession or under our control and personal information that we collect or receive from or about you. It stipulates, amongst others, how we collect the information, the type of information collected, why that information is collected, the circumstances under which that information will be shared with others, the security measures that we have implemented to protect the information and how you may obtain access to and correct your information.

6. Our commitment to you

We understand that in today’s interconnected world you may be concerned about what happens with your personal information. Your privacy and the security of your information are just as important to us and we want to make sure you understand how your information will be processed. We are committed to conducting our business in accordance with the law. We will, therefore, only process, which includes collect, use, store or disclose, your personal information in accordance with the law or otherwise with your consent and will always strive to keep your information confidential. We take this commitment to look after your personal information seriously. We have implemented a number of processes to make sure that your personal information is used in the right way.

We apply the following principles in order to protect your privacy:

- We only collect the personal information that is necessary;
- We only use personal information for the purposes specified in this Privacy Policy, unless you are advised otherwise;
- We do not keep personal information longer than needed for lawful purposes; and
- We only share your personal information as specified in this Privacy Policy and permitted in terms of the law or otherwise as agreed with you.

7. Processing of Personal Information

We process personal information using automated and non-automated means, i.e., with and without human intervention, depending on the circumstances.

8. When You Provide Information about Another Individual / Entity

You must make sure that if you provide personal information about any individual or entity to us, you may lawfully do so (e.g., with their consent). We will accept that you are acting lawfully. You should make sure that they are familiar with this Privacy Policy and understand how we will use and disclose their information.

9. How do we collect your information?

We collect personal information directly from you when

- you become a client or an employee of an Icon Group company;
- you become a patient of Dr SJ Fourie and Partners Inc, any oncology treatment facility operated by Icon or a practice or practitioner to whom we provide managed care services;
- you contact us electronically and/or supply information to us, on the Website or otherwise; and/or
- you become a supplier, service provider or vendor of Icon Group.

Information may also be collected from other sources, depending on the circumstances, when it is, for example, not possible to obtain the information directly from you or to protect your legitimate interests such as ensuring your safety during treatment. The information may be collected from persons, such as a referring healthcare practitioner, another healthcare practitioner involved in your care, your next-of-kin, or when you make information publicly available. The information that we collect about patients is necessary to ensure their safety during treatment and to provide them with the required oncology services.

10. What personal information do we process?

We generally process the personal information listed below, if applicable in the circumstances, and retain it as part of our records. Other personal information may be collected and processed if it is required in the circumstances.

We have CCTV cameras at our treatment facilities and premises that record movement of all persons for security purposes. Except for these recordings, filming or photographing of any person, at any of our facilities or premises is strictly prohibited.

Patients:

There are various laws that permit the processing of personal information of patients such as the National Health Act, POPIA and the Medical Schemes Act. We generally process the following personal information about patients:

- Names and surnames, identity numbers, passport numbers, dates of birth, age, contact details, addresses, nationality and gender;
- Names and contact details of next-of-kin;
- Health status, medical information, including medical history and Covid-19 screening information;
- Medical scheme information or information about other relevant funders;
- Relevant health information such as the diagnosis, treatment and care provided, medicines prescribed, test results (e.g., radiological images and reports, pathology results), any other therapy received, photographs and other images, either received from the treating medical practitioner or taken at our oncology treatment facility required for treatment of your condition;
- Billing and payment details; and
- Information recorded on facility documentation, such as patient forms.

Clients:

We generally process the following personal information about clients:

- Organisation's name and contact details;
- Names, titles and contact details of relevant persons;
- Agreements and related information;
- Financial information, including invoices;
- Official documentation, including newsletters and statements; and
- Correspondence.

Healthcare Practitioners and Employees:

There are various laws that permit the processing of personal information of employees such as labour laws, tax laws, the Occupational Health and Safety Act and the Hazardous Substances Act. We generally process the following personal information about employees of Icon and healthcare practitioners rendering the oncology services or staff members at treatment facilities:

- Names and surnames, titles, identity numbers, dates of birth, age, contact details, addresses, HPCSA / statutory council number, practice code number, position or role in the Icon Group / at the treatment facility, nationality, gender, race, qualifications, specialisation, interests, photos, references and other information included on CVs;
- Membership of professional societies;
- Relevant medical and disability information;
- Signatures of official signatories of the treatment facility and proof of residence, if required by the bank;
- Employment-related information;
- Bank details;

- Professional indemnity cover; and
- Correspondence.

Referring and Other Healthcare Practitioners:

- Names and surnames, titles, identity numbers, contact details, addresses, HPCSA / statutory council number, practice code number, gender, qualifications and specialisation;
- Referral letters; and
- Correspondence.

Suppliers, Vendors and Other Persons or Entities:

We generally process the following personal information about suppliers, vendors and service providers of Icon and any other relevant person (e.g., visitors to Icon facilities and next-of-kin) or entity (e.g., medical schemes and regulators):

- Organisation's name and contact details;
- Names, titles and contact details of relevant persons (including next-of-kin of patients and guarantors / authorised persons of patients);
- Agreements and related information;
- Financial information, including invoices;
- Official documentation, including newsletters and statements;
- Covid-19 screening information of visitors; and
- Correspondence.

11. Consent

If you consent to the processing of your personal information, you may withdraw your consent at any time. This does not affect the processing of personal information that has already occurred. If you withdraw your consent, your personal information will only be processed as provided for in the law.

12. Objection to Processing

When we process your personal information to protect your legitimate interests or based on the legitimate interests of Icon or those of a third party to whom we supply the information, you may object to our processing, if it is reasonable to do so. This must occur on the form prescribed by POPIA, available at the reception of the relevant entity and from the Information Officer. This does not affect your personal

information that we have already processed. If you object and we agree with your objection, your personal information will only be processed as provided for in the law.

13. Why do we process your personal information?

Icon generally processes patients' personal information for the following purposes:

- to manage the various treatment facilities in accordance with the law, including the administration of the facilities and claiming and collecting payment for services rendered from relevant funders, patients and/or responsible persons / entities;
- for treatment and care of patients;
- for communication purposes (e.g., reminders of patient appointments);
- to keep patient records;
- for reporting to persons and bodies, including referring practitioners, as required and authorised in terms of the law or by the data subjects;
- for historical, statistical and research purposes;
- for clinical trials / research studies;
- for identification of patients;
- for enforcement of Icon Group's or the relevant facility's rights; and/or
- for any other lawful purpose related to the activities of the treatment facilities.

Other Icon Group Companies generally process your personal information for the following purposes:

- to conduct and manage the company in accordance with the law, including the administration of the company and claiming and collecting payment for services rendered from clients;
- for organisational and governance purposes;
- for the provision of client services;
- for client and potential client engagement and management of relationships;
- for conclusion and performance of contracts;
- for the maintenance of company and staff records;
- for talent management;
- for employment and related matters of staff;
- for communication purposes;
- for reporting to persons and bodies, as required and authorised in terms of the law or by you;
- for historical, statistical and research purposes;
- for clinical trials / research studies;
- for procurement;
- for enforcement of the Icon Group of Companies' rights; and/or
- for any other lawful purpose related to the activities of the Icon Group.

14. With whom will we share your personal information?

We will share only relevant personal information about you with the persons and entities specified below if it is necessary and lawful in the circumstances. Any other sharing of personal information will only occur if it is permitted by law or otherwise with your consent.

Patients:

We generally share patient information with the following persons and entities:

- Treating (such as radiotherapists) and/or referring practitioners;
- Next-of-kin and other persons as may be required and authorised in the circumstances;
- Guarantors for payment of invoices;
- Relevant funders such as the patient's medical scheme;
- Practitioners and employees at the facility and service providers (such as relevant Icon Group Companies and technology service providers) who assist us to provide the services and who perform functions related to the administration of the facility on a need-to-know basis, subject to confidentiality undertakings;
- Debt collectors / attorneys;
- Our insurers;
- Our professional and legal advisers, including our accountants / auditors;
- Law enforcement structures, including courts and tribunals;
- Regulatory and other public or private bodies, persons or entities, as may be required or permitted in terms of the law, including to comply with any legal obligation or to protect the rights, property or safety of our facility, employees, patients, the public or others; and
- The purchaser of the business, if applicable.

Clients

We generally share client information with the following persons and entities:

- Directors and employees of the relevant entity and service providers (such as relevant Icon Group Companies and technology service providers) who assist us to provide the services and who perform functions on a need-to-know basis, subject to confidentiality undertakings;
- Our professional and legal advisers, including our accountants / auditors;
- Debt collectors / attorneys;
- Our insurers;
- Law enforcement structures, including courts and tribunals;

- Regulatory and other public or private bodies, persons or entities, as may be required or permitted in terms of the law, including to comply with any legal obligation or to protect the rights, property or safety of our business, employees, the public or others; and
- Any successor in title of the relevant entity.

Healthcare Practitioners and Employees:

We generally share the following personal information about employees of Icon and healthcare practitioners rendering the oncology services or staff members at treatment facilities owned or operated by Icon with the following persons and entities:

- Practitioners and employees at the facility and service providers (such as relevant Icon Group Companies and technology service providers) who assist us to provide the services and who perform functions related to the administration of the facility on a need-to-know basis, subject to confidentiality undertakings;
- Directors, other employees, suppliers and vendors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings, where applicable;
- Vetting agencies;
- SAPS (criminal checks);
- Next-of-kin in emergency situations;
- Funders;
- Our insurers;
- Suppliers and vendors;
- Entities performing peer review;
- Our professional and legal advisers, including our accountants / auditors;
- Law enforcement structures, including courts and tribunals;
- Regulatory and other public or private bodies, persons or entities, as may be required or permitted in terms of the law, including to comply with any legal obligation or to protect the rights, property or safety of our facility, employees, patients, the public or others; and
- The purchaser of the business, if applicable.

Referring and Other Healthcare Practitioners:

We generally share information about referring and other healthcare practitioners with the following persons and entities:

- Next-of-kin of patients;
- Relevant funders such as the patient's medical scheme;

- Directors, other employees, practitioners, suppliers and vendors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings, where applicable;
- Our professional and legal advisers, including our accountants / auditors;
- Law enforcement structures, including courts and tribunals;
- Regulatory and other public or private bodies, persons or entities, as may be required or permitted in terms of the law, including to comply with any legal obligation or to protect the rights, property or safety of our business, employees, patients, the public or others; and
- Any successor in title of the business.

Suppliers, Vendors and Other Persons and Entities:

- Directors, other employees, practitioners, suppliers and vendors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings, where applicable;
- Our professional and legal advisers, including our accountants / auditors;
- Debt collectors / attorneys;
- Our insurers;
- Law enforcement structures, including courts and tribunals;
- Regulatory and other public or private bodies, persons or entities, as may be required or permitted in terms of the law, including to comply with any legal obligation or to protect the rights, property or safety of our facility, employees, patients, the public or others; and
- Any successor in title of the relevant entity.

15. How do we protect your information?

We are committed to ensuring the security of your personal information in order to protect it from unauthorised processing and access as well as loss, damage or unauthorised destruction. We continually review and update our personal information 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 or organisational measures and internal policies to prevent unauthorised access, loss or use of personal information. These measures include the physical securing of the offices where information is held, the locking of cabinets with physical records, password control to access electronic records, off-site data back-ups and stringent policies in respect of electronic record storage and dissemination. In addition, only those employees and service providers that require access to your information to discharge their functions and to render services to us are granted access to your information and only if they have concluded agreements with or provided undertakings regarding the implementation of appropriate security measures, maintaining confidentiality and processing

the information only for the agreed purposes. We will inform you and the Information Regulator, if any person has unlawfully obtained access to your personal information, subject to the provisions of the law.

16. Record-Keeping

We maintain records of your personal information for as long as it is necessary for lawful purposes related to the conducting of our business, including to provide treatment and care to patients, comply with legal obligations, resolve complaints, attend to litigation (if applicable), enforce agreements and for historical, statistical and research purposes subject to the provisions of the law.

17. Is your information sent to other countries?

We process and store your personal information within South Africa. If we must provide your personal information to any third party in another country, we will obtain your prior consent unless such information may be lawfully provided to that third party.

18. Right to Access your Personal Information

You have the right to request access to your personal information in our possession or under our control and information of third parties to whom we supplied that information subject to restrictions imposed in legislation. If you wish to exercise this right, please complete the prescribed form, available at the reception of the relevant entity and from its Information Officer and submit it to the receptionist / Information Officer. Costs may be applicable to such request, which can be obtained from the receptionist / Information Officer. Please consult our PAIA Manual for further information.

19. Accuracy of Your Personal Information

It is important that we always have accurate information about you on record as it could impact on communication with you and your health, if applicable. You must therefore inform us as soon as any of your information has changed. You may also request us to correct or delete any information. Such a request must be made in writing on the prescribed form, available at the reception of the relevant entity and from its Information Officer and be submitted to the receptionist / Information Officer. You must provide sufficient detail to identify the information and the correction / deletion required. Information will only be corrected / deleted, if we agree that the information is incorrect or should be deleted. It may not be possible to delete all the information if we may lawfully retain it. Please enquire at reception or contact the Information Officer to discuss how we can assist you with your request. If we correct any information and the corrected information will impact on any decision made or to be made about you, we will send the corrected information to persons to whom the information has been disclosed in the past if they should be aware of the changed information.

20. Changes to this Policy

We reserve the right in our sole and absolute discretion, to revise or supplement this Privacy Policy from time to time to reflect, amongst others, any changes in our business or the law. We will publish the updated Privacy Policy on our website. It will also be available at the reception of all the Icon Group Companies and treatment facilities subject to this Policy. Any revised version of the Policy will be effective as of the date of posting on the website, so you should always refer back to the website for the latest version of the Policy. **It is your responsibility to make sure you are satisfied with any changes before continuing to use our services.** If you have any questions concerning this Policy, please contact our Information Officer.

21. Concerns and Complaints about the Processing of Your Personal Information

All enquiries, requests or concerns regarding this Policy or relating to the processing of your personal information by us should be addressed to the Information Officer. You may also lodge a complaint with the Information Regulator at POPIAcomplaints.IR@inforegulator.org.za (violation of personal information) or PAIAcomplaints.IR@inforegulator.org.za (access to record requests). We would appreciate it if you would give us the opportunity to consider your complaint before you approach the Information Regulator.

22. Laws Applicable to this Privacy Policy

This Privacy Policy is governed by the laws of the Republic of South Africa.
