



GOLDEN ARROW
EMPLOYEES' MEDICAL BENEFIT FUND

Golden Arrow Employees' Medical Benefit Fund

POPIA Policy

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1. DEFINITION OF TERMS

Personal Information – Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

2. ACRONYMS / ABBREVIATIONS

PAIA – Promotion of Access to Information Act 2 of 2000

POPIA – Protection of Personal Information Act 4 of 2013

3. INTRODUCTION TO THE POPIA POLICY

3.1 BACKGROUND

Golden Arrow Employees' Medical Benefit Fund is registered in terms of the Medical Schemes Act to provide healthcare cover for its members and their dependants.

Golden Arrow Employees' Medical Benefit Fund is obligated to comply with the Protection of Personal Information Act 4 of 2013 (POPIA). POPIA requires Golden Arrow Employees' Medical Benefit Fund to inform its beneficiaries as to how their personal information is used, disclosed and destroyed.

Golden Arrow Employees' Medical Benefit Fund guarantees its commitment to protecting its beneficiaries and other stakeholders' privacy and ensuring that their personal information is used appropriately, transparently, securely and under applicable laws.

3.2 PURPOSE OF THE POPIA POLICY

The Policy sets out how the Fund deals with its members' personal information and stipulates the purpose for which such personal information is used. The Policy is made available on the Fund's website (www.goldenarrowmed.co.za). It is also available by request from the offices of the Fund.

3.3 POLICY REVIEW

The Policy will be reviewed annually by the Board of Trustees of the Fund. In addition, interim changes may be made from time to time were appropriate.

4. PROTECTION OF PERSONAL INFORMATION IN TERMS OF POPIA

4.1. PERSONAL INFORMATION COLLECTED

Section 9 of POPIA states that "Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive."

Golden Arrow Employees' Medical Benefit Fund collects, and processes personal information received from its beneficiaries using its administrator as well as information of other stakeholders. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, Golden Arrow Employees' Medical Benefit Fund, through its administrator, will inform the members as to the information required and the information deemed optional.

4.2. THE USAGE OF PERSONAL INFORMATION

Personal Information will only be used for the purpose for which it was collected and as agreed.

This may include:

- Providing services to members and carrying out the transactions requested;
- For sharing with other third parties, if necessary;
- Processing applications for Fund benefits;
- Processing medical claims for payment;
- Confirming, verifying and updating members' details;
- For the detection and prevention of fraud, crime, moneylaundering;
- For audit and record-keeping purposes;
- Providing communication in respect of Golden Arrow Employees' Medical Benefit Fund and regulatory matters that may affect members; and
- In connection with and to comply with legal and regulatory requirements, or when it is otherwise allowed by law.

According to section 10 of POPIA, personal information may only be processed if certain conditions, listed below, are met along with supporting information for the processing of personal information:

- The member consents to the processing: consent is obtained from members during the application stage for membership;
- Processing complies with an obligation imposed by the Medical Schemes Act, as well as other related legislation; and
- Processing protects the legitimate interest of the member.

4.3. DISCLOSURE OF PERSONAL INFORMATION

Golden Arrow Employees' Medical Benefit Fund may disclose a member's personal information to any of its third- party service providers, including its administrators who have agreements in place to ensure compliance with confidentiality and privacy conditions.

Golden Arrow Employees' Medical Benefit Fund and its administrators may also share personal information with and obtain information about members from third parties for the reasons already discussed above.

Golden Arrow Employees' Medical Benefit Fund may also disclose a member's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary to protect its rights.

4.4. SAFEGUARDING MEMBERS' PERSONAL INFORMATION

POPIA requires Golden Arrow Employees' Medical Benefit Fund to adequately protect personal information. Golden Arrow Employees' Medical Benefit Fund continuously reviews its security controls and processes to ensure that personal information is secure and that its operators comply with POPIA.

The following procedures are in place to protect personal information:

- (i) Golden Arrow Employees' Medical Benefit Fund's Information Officer is Mr. Johan van der Walt whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPIA;
- (ii) This Policy has been put in place throughout the Fund and its operators are trained on this Policy and POPIA;
- (iii) All electronic files or data are backed up by Golden Arrow Employees' Medical Benefit Fund's operators, who are also responsible for system security that protects third party access and physical threats; and

(iv) The policies and procedures of Golden Arrow Employees' Medical Benefit Fund's operators cover the following:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information; and
- Investigating and reacting to security incidents.

Consent to process member information is obtained from members (or a person who has been given authorisation from the member to provide the member's personal information) during the application stage of membership.

4.5. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- (i) Members have the right to access the personal information Golden Arrow Employees' Medical Benefit Fund holds about them;
- (ii) Members also have the right to ask Golden Arrow Employees' Medical Benefit Fund and its operators to update, correct or delete their personal information on reasonable grounds;
- (iii) Once a member objects to the processing of their personal information, Golden Arrow Employees' Medical Benefit Fund or its operators may no longer process said personal information; and
- (iv) Golden Arrow Employees' Medical Benefit Fund and its operators will take all reasonable steps to confirm Members' identity before providing details of their personal information or making changes to their personal information.

5. RETENTION & CONFIDENTIALITY OF DOCUMENTS, INFORMATION AND ELECTRONIC TRANSACTIONS

- (i) All personal information is dealt with in the strictest confidence and may only be disclosed in the following circumstances:
 - where disclosure is under compulsion of law;
 - where there is a duty to the public to disclose; and
 - where the interests of Golden Arrow Employees' Medical Benefit Fund or its operators require disclosure.

(ii) Disclosure to 3rd parties:

All employees of 3rd parties have a duty of confidentiality concerning Golden Arrow Employees' Medical Benefit Fund and its members. In addition to the provisions of the clauses above, the following are also applicable:

- Information on members: Our members' right to confidentiality is protected in the Constitution and terms of legislation. Information may be given to a 3rd party if the member has consented in writing to that person receiving the information;
- Requests for Golden Arrow Employees' Medical Benefit Fund information: These are dealt with in terms of PAIA, which gives effect to the constitutional right of access to information held by the State or any person (natural and juristic) that is required for the exercise or protection of rights. Golden Arrow Employees' Medical Benefit Fund may, however, refuse access to records if disclosure would constitute an action for breach of

the duty of secrecy owed to a third party.

In terms hereof, requests must be made in writing on the prescribed form to the Information Officer in terms of PAIA. The requesting party has to state the reason for wanting the information and has to pay a prescribed fee.

Golden Arrow Employees' Medical Benefit Fund's combined PAIA & POPIA manual, which contains the prescribed forms and details of prescribed fees, is available on the website www.goldenarrowmed.co.za.

6. DESTRUCTION OF DOCUMENTS

Documents may be destroyed after the termination of the specified retention periods.

7. NON-COMPLIANCE WITH THE POLICY

Appropriate disciplinary action is taken against officials/ employees who contravenes this Policy.

8. AVAILABILITY OF THE PAIA AND POPIA MANUAL

The combined PAIA and POPIA manual is made available on the Fund's website and at the Fund's office.

9. INFORMATION OFFICER DETAILS

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