Periopp

Web site content

Protection of Personal Information Act (POPIA)

Privacy Policy

Introduction and purpose

At Periopp (a South African healthcare scheduling platform), we respect your privacy and comply with the Protection of Personal Information Act (POPIA). This policy explains what personal information we collect through our Web site and app, why we collect it, and how we use and protect it. We aim to be transparent and keep this policy clear and easy to read. As a medical platform, we may handle health-related data, which POPIA classifies as "special personal information". Such sensitive information is treated with extra care under the law.

What personal information we collect

We collect information that you provide to us and technical data from your use of Periopp. The categories of personal information may include:

- **Identity and contact details:** such as your name, date of birth, email address, phone number, and mailing address.
- **Professional information:** such as your medical license, specialty, workplace, and qualifications.
- Account details: such as a username, password, and profile settings for accessing the Periopp app.
- **Health and scheduling information:** for example, any patient or case details you enter when coordinating surgeries. (POPIA treats health information as special personal data.)
- **Usage and technical data:** such as device and browser information, IP address, login times, and cookies (to improve the app and prevent fraud).
- **Financial or payment information:** if you make payments through the platform, we collect the necessary billing details (processed securely).

These categories are examples. We only collect what is needed to provide the service and may update them as our features change.

Why we collect your information

We collect your information to provide and improve the Periopp scheduling service. Key reasons include:

- Scheduling services: to match anaesthetists with surgical cases and manage operating room schedules efficiently. This requires knowing your availability, qualifications, and case requirements.
- **Platform operation:** to set up and maintain your Periopp account, authenticate logins, and enable core features (like calendar syncing and case assignments).
- **Notifications and communication:** to send you appointment reminders, scheduling updates, alerts about changes, and other essential messages.
- **Customer support:** to respond to your inquiries, troubleshoot issues, and provide assistance when you contact us.

- **Service improvement:** to analyse how the platform is used and make improvements or develop new features (e.g. trending analytics, usage patterns). This may involve aggregating and anonymising data.
- Legal and safety compliance: to verify professional credentials (as required by healthcare regulations) and to ensure patient and user safety. For example, confirming an anaesthetist's license.

Collecting your personal information enables Periopp to operate effectively as a scheduling platform. We will not use your data for purposes unrelated to these goals without your consent.

How we collect your information

We gather personal information in several ways:

- **Directly from you:** when you register on our Web site or app, complete your profile, or submit a form (e.g. scheduling a case or contacting support).
- Through your activity: when you use the Periopp app or Web site, we collect data from your device (via cookies or app analytics) and record actions like logins, searches, and calendar entries.
- Communications: when you email, call, or message our support team, we may keep a record
 of those communications.
- **Third-party sources:** we may receive information from hospitals or clinics you work with, staffing agencies, or other healthcare partners if you authorise such sharing. For example, a hospital might send us details of a new case assignment.
- **Publicly available or third-party databases:** if needed for verification, we may obtain professional license information from public registries.

We collect data in a lawful and fair manner, giving notice where required. You must provide most of this information to use Periopp; omitting it may limit your ability to use the service.

Legal basis for processing

Under POPIA, we can only process your personal information if we have a valid legal basis. The bases we rely on include:

- Your consent: You agree to share your data when you register or opt into features. For example, you consent to us using your contact details to send scheduling notifications.
- **Contractual necessity:** Processing is necessary to perform our contract with you. For instance, we need your information to deliver the scheduling service you signed up for.
- Legitimate interests: We may use your data for purposes like improving the platform or securing the system, as long as it does not override your rights. For example, analysing usage statistics to enhance the app is a legitimate interest.
- **Legal obligation:** If the law requires it (e.g. reporting certain information to authorities), we will process data accordingly.

We do **not** process your personal information on any other basis. Whenever consent is needed (especially for sensitive data), we will ask you clearly and allow you to withdraw consent at any time.

Sharing of personal information

We may share your information only in limited ways:

- Service providers and partners: We use trusted third-party vendors (such as cloud hosting, email services, analytics, and payment processors) to support our operations. These providers only access personal data as needed to perform their services, and they are obligated to protect it.
- **Healthcare affiliates:** With your consent, we may share relevant scheduling or credential information with hospitals, clinics, or staffing agencies involved in your assignments (so they know you are available and qualified for cases).
- **Legal requirements:** We may disclose personal information if required by law, court order, or government regulation (for example, reporting to medical regulators).
- **Business transfers:** If Periopp is merged, sold, or reorganised, personal data may be transferred to the new entity (we would require them to honour this Privacy Policy or inform you of changes).

We do **not** sell your personal information to third parties or use it for unrelated marketing. Sharing only happens as described above or with your explicit permission.

Cross-border transfers

Periopp may process data on servers or services located outside South Africa (for example, cloud servers). POPIA generally prohibits transfers to foreign parties unless certain conditions are met. In practice, this means we will only transfer personal data to countries that offer a level of protection comparable to South Africa, or under legally binding agreements. For example, transfers to service providers in the EU or UK are allowed because they have strong data protection laws. If we need to send your data to a country without an adequate law, we will ensure that appropriate safeguards (like binding agreements) are in place and, where required, we will obtain your explicit consent.

How we protect your information

We implement strong security measures to safeguard your data:

- **Encryption:** We use industry-standard encryption (HTTPS/TLS) when you use our Web site or app, so data in transit is protected. Sensitive data stored on our servers is encrypted at rest. Even if data were intercepted or accessed unlawfully, encryption helps keep it unreadable.
- Access controls: Only authorised Periopp personnel and service providers have access to
 personal data, and only as needed for their role. We require strong authentication (secure
 passwords, and where possible multi-factor authentication) and we regularly review access
 privileges.
- Regular security practices: We follow industry best practices and POPIA's security requirements. This includes regular security assessments, system updates, firewalls, and backups. We train our staff in data protection principles and monitor our systems for unauthorised access.
- **Data minimisation:** We only keep personal data as long as necessary. Unneeded information is securely deleted or anonymised in accordance with retention policies.

These safeguards help prevent loss, theft, or unauthorised use of your personal information.

Your rights under POPIA

POPIA grants you several rights over your personal information. In plain language, these include:

• **Right to access:** You can ask Periopp to confirm whether we hold personal data about you and request a copy of that data. You may request details like what information we have, why we have it, and who we have shared it with.

- Right to correction (updating): If your personal information is wrong or outdated, you can ask us to correct it. We will take reasonable steps to update or delete incorrect data in our records.
- Right to deletion: In certain cases, you can ask us to delete your personal information. For
 example, if the data is no longer needed for our services or if you withdraw consent, you can
 request erasure. We will delete data unless we have a lawful reason to retain it (such as legal
 obligations).
- Right to object or withdraw consent: You may object to certain types of processing (e.g. for direct marketing) or withdraw consent you previously gave. If you withdraw consent, we will stop processing your information for that purpose.
- Right to file a complaint: If you feel that Periopp has violated your privacy rights or POPIA, you can lodge a complaint with South Africa's Information Regulator. We will cooperate fully with any such investigation.

To exercise any of these rights, please contact us (see below). We will respond within the timeframes required by law. We will not discriminate or penalise you for exercising your rights under POPIA.

How to contact us

If you have questions about this Privacy Policy or want to exercise your rights, please reach out to our Information Officer at:

• Email: admin@periopp.co.za

Phone: Tel: Pending

• **Mailing Address:** Periopp Data Protection Officer, Postnet Suite 25, Private Bag X12, Menlopark, Pretoria 0102

We will do our best to address your concerns. If you are not satisfied with our response, you also have the right to contact the Information Regulator (visit their Web site at www.justice.gov.za/inforeg/ for details).

Changes to this policy

We may update this Privacy Policy from time to time (for example, if the law changes or we add new features). When we do, we will revise the "Last updated" date at the top. Significant changes will be communicated by posting a notice on our Web site or by other appropriate means. We encourage you to review this policy periodically to stay informed about how we protect your information.

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