

South African Association of Community Pharmacists

PRIVACY POLICY

Updated 06 July 2023

1. INTRODUCTION

The South African Association of Community Pharmacists (hereafter “SAACP”) respects your privacy and your personal information. This Privacy Policy together with the SAACP PAIA Manual aims to let you know how the SAACP will treat any personal information that it may have about you and how you can access such personal information held. The SAACP will take all reasonable measures, in accordance with this Policy, to protect your personal information and to keep it confidential.

2. DEFINITION OF PERSONAL INFORMATION

Personal information is “personal information” as defined in terms of section 1 of the Protection of Personal Information Act 4 of 2013 (“POPIA”). This is information relating to an identifiable, living natural person or existing juristic person. Please refer to POPIA for a detailed definition and various types or categories of personal information.

3. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION COLLECTED

The SAACP only collects general personal information (some of which may be publicly available) and aims to only collect that personal information which is necessary for it to carry out its services and other facilities provided to you. The SAACP collects the following categories of personal information:

- a. Member – such as name, age, gender, province, SAACP branch affiliation, contact phone number, email, and employment under the following categories:
 - b. **Corporate community pharmacy:** Any pharmacy listed on the Johannesburg Stock Exchange (JSE) (e.g. Dischem, Clicks and Medirite)
 - c. **Independent community pharmacy group:** a group of pharmacies with the same owner (e.g. Van Heerden Pharmacies, Arrie Nel pharmacies)
 - d. **Independent community pharmacy franchised groups:** a group of pharmacies within a franchise group but independently owned (e.g. Spar pharmacies, The Local Choice pharmacies, Link pharmacies)
 - e. **Courier community pharmacy:** a community pharmacy that operates a postal medication service delivering medication to patients (e.g. Medipost, PharmacyDirect)

- f. **Independently owned community pharmacy:** an owner who owns one or more pharmacies, which is not part of a group or franchise (this survey is not focussed on this group)
- b. Member profiles provide for other information to be provided but this is voluntary information that can be provided at the discretion of the member.
- c. Further information may be requested by the SAACP depending on the service being provided or for statistical or healthy and safety reasons.
- d. NEC Designations – same information as per Members above including records of results and decisions.

4. HOW PERSONAL INFORMATION IS COLLECTED

Your personal information is obtained either via your PSSA membership application forms, regional Branch membership records, and/or direct email communications and social media campaigns.

5. PURPOSE FOR COLLECTING PERSONAL INFORMATION

The SAACP collects personal information for the following purposes:

- a. To provide you with services offered and requested.
- b. To understand your specific needs and requirements, and in order to improve the SAACP member benefit, service and value offering.
- c. To provide you with SAACP communications in relation to the services being rendered, and keeping you informed of governance related updates.
- d. To provide you with SAACP related marketing material due to your past interaction and use of the SAACP services.
- e. For statistical, historical and/or reporting purposes.

The SAACP will always ask for your permission before it uses your personal information for any purpose not disclosed above or unrelated to the operations/services of the SAACP and its use in the ordinary course of business.

6. RECIPIENTS OF PERSONAL INFORMATION

The Personal information collected is used only by the SAACP and its employees in the rendering of its organisational purpose and services. Only in instances where the sharing of personal information to recipients outside of the SAACP is necessary in order to fulfil a SAACP obligation or service will such information be provided.

7. PERSONAL INFORMATION SHARED TO THIRD PARTIES

As part of the Member Benefits provided to SAACP Members, the SAACP may be required to provide third party service providers with minimal Member personal information (such as for example: name, contact details) in order to provide such Member Benefits. Personal information provided to third party service providers for such purposes, will be limited to only that information which is absolutely necessary in order for the member to enjoy such benefit which he/she is entitled to. No further information will be provided and third party service providers are prohibited from using Member details for any other purpose other than providing the Member Benefit or for statistical and historical purposes.

Your privacy is important to us. The SAACP will therefore not sell, rent nor provide your personal information to unauthorised entities or to third parties for their independent use without your consent. The SAACP will release your personal information to a party if it believes that SAACP is required by law or by a court or statutory body to do so. The SAACP will also disclose your personal information if the SAACP believes that it is necessary to prevent or lessen any unlawful or harmful actions and to protect and defend legitimate business interests, rights or property of the SAACP.

8. PROTECTION OF PERSONAL INFORMATION

The SAACP values the information that you choose to provide to us and will therefore take reasonable steps to protect your personal information from loss, misuse or unauthorised alteration. The SAACP conducts regular security testing of its servers and ensures that its employees are trained around protection of personal information to ensure that your personal information is used correctly and protected.

When you use the services or facilities provided by the SAACP you may be given an access number, username, password and/or personal identification number ("PIN"). You must always keep your username, password and/or PIN a secret and ensure that you do not disclose it to anyone. The SAACP shall not be held responsible for personal information accessed as a result of you providing someone your SAACP profile username and password.

Upon your request the SAACP will provide you with its records of the personal information you provided to us. For security reasons, this information will only be sent to the e-mail address on file for the subscriber username and password associated with it.

If you wish to object to the SAACP processing your personal information, kindly complete Form 1 (Annexure A) in terms of POPIA and send same to the Information Officer at the SAACP or to nationaloffice@saacp.org.za. Objecting to the processing of your personal information, may result in services being stopped, access or implementation issues and/or other service inefficiencies and communications.

9. STORAGE OF PERSONAL INFORMATION AND RETENTION THEREOF

Personal information is stored on the SAACP servers located onsite and in the cloud (which in this case may be hosted outside of South Africa, see Clause 10 below) which is accessed by SAACP internal employees only. Personal information will only be retained for so long as necessary to carry out the function, services required and/or for historical and statistical use by the SAACP.

Personal Information no longer required for the purposes of rendering services to you or after completion of services, will be destroyed. The SAACP undertakes to ensure that personal information shall not be stored for longer than 5 years, unless required to do so by law or other regulatory obligations and/or for historical record purposes. The SAACP however may maintain de-identified information for statistical purposes.

Note: Membership records, Service Agreements, training attendance records, and reports in terms of specific scope of work and personal information related thereto shall be kept for the SAACP indefinitely. The purpose of which is to ensure a continuous and accurate record of your membership, training history and reports/advice provided by the SAACP.

10. LINKS ON SAACP WEBSITE OR EMAIL COMMUNICATIONS

The SAACP is not responsible for the content or the privacy policies of websites of other institutions to which it may link you to – mainly for information purposes and access to documents provided by such institutions. The use of other third party websites and content is at your sole discretion. This Policy applies solely to information collected by the SAACP.

The SAACP is not responsible for any representations or information or warranties or content on any website of any third party (including websites linked to the SAACP website). The SAACP does not exercise control over third parties' privacy policies and you should refer to the privacy policy of any third party to see how such party protects your privacy.

11. PERSONAL INFORMATION HELD BY OR DISCLOSED BY YOU TO THIRD PARTIES

If you disclose any personal information to a third party, such as one of our business partners or anyone other than the SAACP, you must be aware that the SAACP does not regulate or control how that third party uses your personal information. You should always ensure that you read the privacy policy of any third party.

12. CORRECTION OF PERSONAL INFORMATION

It is your responsibility to ensure that the personal information provided to the PSSA is true, correct and accurate at all times. You may update and correct your personal information at any time via email tersea@pssa.org.za. The SAACP does not vet or check the information provided to it, and thus will not be held responsible for any incorrect or outdated information it may and which may be used to provide you with relevant and important communications.

If you would like your Personal Information deleted by the SAACP, kindly also use Form 2 (Annexure B) and send same to the Information Officer at the SAACP or to nationaloffice@saacp.org.za. Deleting your Personal Information may impact the services being used, offered or access there to.

13. ACCESS TO PERSONAL INFORMATION HELD BY THE SAACP

See the SAACP PAIA Manual for detailed information around your rights to access information held by the SAACP and applicable steps to follow.

14. CHANGES TO THIS POLICY

The SAACP may change this Policy at any time. The most current version of this Policy will be displayed on the SAACP website. If you use this website or any of the services or facilities offered by the SAACP after the SAACP has displayed a change to this Policy, you will be deemed to have read and agreed to the change.

15. APPLICABLE LAWS

This Policy will be governed by the laws of the Republic of South Africa. Specifically, the SAACP undertakes to comply with the provisions of POPIA and the Promotion of Access to Information Act No.2 of 2000 ("PAIA").



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Advocates for Community Pharmacists.
A Sector Body of the Pharmaceutical Society
of South Africa.

16. JURISDICTION

You consent to the jurisdiction of the South African courts for any dispute which may arise out of this privacy policy.

Compiled 6 July 2023

Reviewed (due 6 July 2024)