

# **JOHARET VILJOEN FISIOTERAPEUTE (PTY) LTD**

## **PROTECTION OF PERSONAL INFORMATION ACT (POPIA) INFORMATION MANUAL**

Effective Date: 08/09/2025

## 1. Introduction

This manual has been developed in accordance with the Protection of Personal Information Act, 4 of 2013 (“POPIA”). The purpose of POPIA is to ensure that personal information is processed in a lawful and reasonable manner that does not infringe the privacy of patients, employees or any other stakeholders.

This manual outlines how Joharet Viljoen Fisioterapeute (Pty) Ltd collects, process, stores, shares and protect personal information in compliance with POPIA.

## 2. Contact details of the responsible party

Name of Practice:	<b>Joharet Viljoen Fisioterapeute (Pty) Ltd</b>
Registration Number:	<b>2025/100188/07</b>
Information Officer:	<b>Joharet Viljoen</b>
Physical and Postal address:	<b>The Islands Medical The Islands Mall, R512 Hartbeespoort North West 0216</b>
Telephone:	<b>072 202 1840</b>
Email:	<b><a href="mailto:viljoenfisio@gmail.com">viljoenfisio@gmail.com</a></b>

## 3. Personal information

Personal information (PI) means information relating to an identifiable, living, natural person, and where it is applicable, existing juristic person, including, but not limited to:-

- (a) Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial or employment and/or employment history of the person;

- (c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
- (d) the biometric information of the person (where applicable);
- (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

## 4. Personal information categories

### 4.1. Patient information

- Identity information (name, ID/Passport number, date of birth)
- Contact information (addresses, cell phone number, email address)
- Medical aid details
- Medical history, clinical notes, treatment records and diagnostic results
- Consent forms and referral letters.

### 4.2. Employee information

- Identity and contact details
- Employment contract and HR records
- Payroll and tax details
- Qualifications and professional registrations

### 4.3. Supplier/service provider information

- Business contact details
- Contracts and invoices
- Banking details (if applicable)

## 5. Purpose of processing personal information

The physiotherapy practice processes personal information for the following purposes:

- To provide physiotherapy and related healthcare services;
- To maintain accurate patient records;
- For billing patients and submitting claims to medical schemes;
- To comply with legal and regulatory requirements;
- For practice administration and management;
- For employment management, payroll and compliance with labour laws;
- For communication with patients, suppliers and other stakeholders.

## 6. Lawful basis for processing of personal information

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:-

- a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, as well as restriction, degradation, erasure or destruction of information.

Personal information is processed in terms of the following lawful bases under POPIA:

- **Consent:** Patients provide consent for the processing of their personal and health information.
- **Contractual necessity:** Information is required to perform healthcare services or employment obligations.
- **Legal obligations:** Records required under the Health Professions Act, National Health Act and other applicable laws.
- **Legitimate interests:** For the administration and management of the practice.

## 7. Sharing of personal information

Personal information may be shared with:

- Medical schemes or insurers for claims processing;
- Referrals and other healthcare professionals (with patient consent);
- Statutory and regulatory bodies (e.g. HPCSA, Department of Health)
- Service providers (e.g. IT, accounting, HR) under confidentiality agreements
- Courts or authorities where legally required.

We will never sell or disclose your information to unauthorised third parties.

## 8. Information Security Safeguards

The practice implements reasonable technical organisational measures to protect personal information from accidentally being lost, used or accessed in any unauthorised manner, including:

- Secure physical storage of patient files and information;
- Password-protected electronic records;
- Access controls to ensure only authorised staff access information;
- Confidentiality agreements with employees and service providers.

## 9. Data subject rights

Under POPIA, patients, employees, and other data subjects have the right to:

- Be informed about the collection and use of their personal information;
- Access their personal information;
- Request corrections or deletion of inaccurate, irrelevant or excessive information;
- Object to the processing of personal information in certain circumstances;
- Withdraw consent for processing of information (where consent is the lawful basis);
- Lodge a complaint with the Information Regulator.

Requests must be submitted in writing to the listed contact details in clause 2.

## 10. Retention and destruction of records

Records are retained according to the following guidelines:

- **Patient records**

Retained in accordance with the National Health Act. The recommended period is a minimum of 6 years or longer, where required.

- **Employee and financial records**

Retained as required by tax and labour legislation.

- **Information no longer required**

These documents are securely destroyed by means of shredding paper files and permanent deletion of electronic files.

## 11. Availability of the manual

This manual is available at the office of the practice during office hours by prior arrangements or on request to the information officer.

## 12. Updates to the manual

This manual will be updated if and when new legislation or operational requirements arise or when the practice's information processing activities change.