

## PRIVACY POLICY

**Please read this Privacy Policy carefully to understand how the Radiological Society of South Africa (RSSA) will process your personal information. Every term of this Policy is material.**

### 1. ABOUT THE RSSA

The RSSA is a voluntary membership association and is the voice of the radiology profession in South Africa.

Our contact details are as follows:

**Address:** 30 Dorp Street Panorama 7500

**E-mail:** [admin@rssa.co.za](mailto:admin@rssa.co.za)

**Tel no.:** 084 293 9789 / 021 713 2602

**Website:** [www.rssa.co.za](http://www.rssa.co.za)

### 2. INFORMATION OFFICER

Our Information Officer is:

Dr Richard Tuft

**E-mail:** [admin@rssa.co.za](mailto:admin@rssa.co.za)

**Tel no.:** 084 293 9789 / 021 713 2602

### 3. DEFINITION OF TERMS

- 3.1 **“Constitution”** refers to the Constitution of the RSSA.
- 3.2 **“Data subject”** has the meaning assigned to it in POPIA and refers to the person to whom the personal information relates and includes both natural and juristic persons.
- 3.3 **“HPCSA”** refers to the Health Professions Council of South Africa.
- 3.4 **“Member”** refers to a person who has been admitted as a member of the RSSA in terms of the Constitution and “membership” has a corresponding meaning.
- 3.5 **“Officer”** refers to a member of the Council or any Committee of the RSSA.
- 3.6 **“Personal information”** has the meaning assigned to it in POPIA, and refers to information relating to identifiable, living, natural persons as well as identifiable, existing

juristic persons. It includes information such as race, gender, age, medical information, identity number, contact details and confidential correspondence. "Information" has a corresponding meaning unless the context requires otherwise.

- 3.7 "**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.
- 3.8 "**POPIA**" means the Protection of Personal Information Act (Act 4 of 2013) any Regulations, Codes of Conduct, Guidelines and Directives issued in terms of the Act.
- 3.9 "**RSSA**" means the Radiological Society of South Africa.
- 3.10 "**We**" / "**us**" refers to the RSSA.
- 3.11 "**You**" / "**your**" refers to the data subject (i.e., the person or entity) whose personal information is in the possession of or under the control of or processed by the RSSA.

#### **4. APPLICATION OF THE PRIVACY POLICY**

This Privacy Policy applies to the 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. This Policy also applies to other persons or entities that may process personal information on our behalf.

#### **5. OUR COMMITMENT**

Your privacy and the security of your information are 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. Furthermore, we will

- only collect personal information that is necessary;
- only use personal information for the purposes specified in this Privacy Policy unless you are advised otherwise;

- not keep personal information longer than needed for lawful purposes; and
- only share your personal information with third parties as specified in this Privacy Policy and/or permitted in terms of the law or as otherwise agreed with you.

## **6. WHEN YOU PROVIDE INFORMATION ABOUT ANOTHER PERSON / ENTITY**

You must make sure that if you provide personal information about someone else to the RSSA, including of a radiology practice, you may lawfully do so (e.g., with their consent). We will accept that you are acting lawfully. You should make sure that they read this Privacy Policy and understand how the RSSA will process their information.

## **7. COLLECTION OF YOUR PERSONAL INFORMATION**

We collect personal information directly from you when you become a member, when you log onto our website, when you are contracted or employed by us and when you provide personal information to us. We also obtain personal information about you when another entity or person provides such information to us. Furthermore, we collect personal information of IT vendors and information about other practitioners and relevant employees at practices from our members. Information may also be collected from other sources (e.g., public records), depending on the circumstances, when it is, for example, not possible to obtain the information directly from you, or, when you make information publicly available. The information that we request from you is necessary to provide you with membership and other services, employment or contracting purposes, procurement and to fulfil our objects as set out in our Constitution.

## **8. PROCESSING OF YOUR PERSONAL INFORMATION**

There are various laws that permit the processing of your personal information such as POPIA. Employment laws permit the processing of employees' information.

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 or if you supply it voluntarily.

### Members and Former Members

Members are obliged to register on the membership system, which is accessible through our

website. Certain information must be supplied on a mandatory basis as indicated when registering. Certain information is voluntary. Members may also choose their own privacy settings in respect of certain specified information, such as information that may be made available to other members. Members' names and practice details are made available to the public on the website. All information submitted, including information that will not be shared with other members or the public, will be available to the site administrators and may be used for support to relevant members as well as, on a de-identified basis, for training and quality control purposes. Members can update their preferences at any time by referring back to the website or sending an email to us.

The following information is generally collected and processed by us in respect of members and stored in the membership system:

- First names and surnames; preferred names; initials; titles; identity numbers; dates of birth; home and postal addresses; email addresses; mobile, work and home telephone numbers; nationalities; gender; race; disability; photos; LinkedIn profile URLs; hobbies or leisure interests; qualifications; dates of qualifications; academic institution names; fellowships; medical specialisation and interests; HPCSA / professional registration numbers in other countries;
- Practice types, names (registered and trading), numbers, addresses, telephone numbers and email addresses; active locations (provinces where conducting business); coordinates of practices; practice branches; modalities covered; roles in practices and frequency of such roles; secondary practice associations;
- RSSA subgroup memberships; SAMA membership;
- Login details;
- Acceptance of website terms and conditions and consent to sharing of information with affiliates;
- Billing details and payment history related to membership fees; and
- Records of engagements and correspondence with the RSSA.

#### Office-Bearers (including Nominators and Nominees)

- Full names and surnames, titles, contact details, gender, nationality; HPCSA status, registration number and good standing, qualifications, photos and information included on curriculum vitae ("CV");
- Information included on nomination forms;
- Signatures of official signatories and proof of residence, if required by the bank;
- Remuneration, tax numbers and bank details;

- Positions held;
- Records of attendance and participation in meetings and business engagements (including virtual meeting recordings); and
- Correspondence.

#### Employees and Job Applicants

- Full names and surnames; titles; identity numbers; age; contact details; positions or roles at RSSA; nationalities; gender; race; marital status; language; passport numbers; passport countries; qualifications; photos; references; bank details and other information included in CVs;
- Relevant medical and disability information;
- Employment-related information such as sick certificates, performance and disciplinary records, salary information, tax numbers and employment history;
- Records of attendance and participation in meetings and business engagements (including virtual meeting recordings); and
- Correspondence.

#### Participants at Events (Webinars and Conferences)

- Practice names and contact details;
- Names and surnames, titles, contact details and HPCSA numbers of attendees;
- Invoices and payment information;
- CVs, agreements, invoices and bank details of presenters;
- Continuing professional development (CPD) certificates; and
- Correspondence.

#### Other Persons

- Next-of-kin of members and employees: contact details;
- References of employees;
- Members: practice managers' names and email addresses, names of other radiologists in their practices and administrative office details (if applicable).

#### Suppliers, Service Providers, Vendors and Other Individuals and Public and Private Bodies / Entities

- Practice-related information: IT vendor details - IT managers names, emails and phone numbers.
- Practice management administrators (debtors & billing) and vendors: Company names,

contact persons, mobile numbers and email addresses.

- Radiology information system (RIS) vendors: Company names, contact persons, mobile numbers and email addresses.
- Radiology information systems (PACS) vendors: Company names, contact persons, mobile numbers and contact emails.
- Others: Names and contact details of persons / bodies / entities; names and surnames, titles, contact details, positions of relevant persons (e.g., account managers) or officers at the applicable entities; CVs (if submitted); agreements and related information; invoices, bank details and payment-related information; official documentation, such as newsletters and brochures; COVID-19 screening information of visitors to the RSSA; and correspondence.

## **9. CONSENT**

If you provide consent for 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.

## **10. OBJECTION TO PROCESSING**

When we process your personal information to protect your legitimate interests or based on our legitimate interests 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 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.

## **11. PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION**

The RSSA processes your personal information for the following purposes:

- to achieve our objects, such as promoting and developing the professions we represent and representing our members;
- to enrol members, administer membership, collect membership fees and provide membership services and benefits;
- to manage the society and for organisational and governance purposes;

- for procurement;
- to administer membership and collect membership fees;
- for communication with members and other stakeholders;
- for business engagements;
- for marketing and sponsorship purposes;
- to conduct member surveys;
- for the distribution of journals and newsletters;
- to engage with regulators, relevant public bodies and other stakeholders (e.g., funders, IT Vendors) on behalf of our members;
- to make information about radiology practices available to the public through our website;
- for historical, statistical and research purposes; and
- for any other lawful purpose related to our business.

## **12. LINKS TO SOCIAL NETWORKING SERVICES**

We use social networking services, such as Twitter, to communicate with the public about our products and services. When you communicate with us through these services, the relevant social networking service may collect your personal information for its own purposes. These services have their own privacy policies, which are independent of this Privacy Policy.

## **13. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We may generally share your information with the following persons and entities as may be relevant in the circumstances:

- Office-bearers and employees;
- Relevant service providers of the RSSA (subject to confidentiality obligations);
- Regulatory and other public bodies;
- Our professional and legal advisers;
- Our accountants and auditors;
- Banks for processing of payments;
- Law enforcement structures, including courts and tribunals;
- Dropbox and iCloud (backups);
- MailChimp (Newsletter distribution); and
- As advised when the information is collected or as may be as required or permitted by law, including where we are under a duty to disclose or share personal information in order to

comply with any legal obligation or to protect the rights, property or safety of our business, employees, the public or others or otherwise with consent.

The following additional sharing of personal information may occur:

- Office-bearers and nominees: Members, insurers and the public (on the website);
- Nominees: Members;
- Employees: Employee benefit providers, SARS, insurers and travel agents;
- Job applicants: Vetting agencies;
- Public and private bodies interacted with on behalf of members: Listed on the website; and
- Members: Other members (subject to privacy settings activated by members), our sub-groups, the public (via our website), publisher of our journal, MailChimp for newsletter distribution, CPD service provider, international societies (United States of America [USA] and Europe) for member benefits, the congress organiser and electronic voting service provider for facilitation of electronic voting at the annual general meeting.

#### **14. RECORD-KEEPING**

We retain records of your personal information for as long as it is necessary for lawful purposes related to the conducting of our business, provide membership services and benefits, comply with legal obligations, attend to legal matters, enforce agreements, comply with our Constitution, as proof and for historical, statistical and research purposes subject to the provisions of the law.

#### **15. SENDING INFORMATION ACROSS THE BORDERS OF SOUTH AFRICA**

We process and store your information in records within the Republic South Africa and also with reputable global service providers such as Dropbox, iCloud and MailChimp, which information may be stored in the USA and other foreign countries. We are not planning to send any other personal information about any data subject to any other third party in a foreign country. Should this be required, relevant data subject consent will be obtained, if required, and transfers of such information will occur in accordance with the requirements of the law.

#### **16. SECURITY OF YOUR PERSONAL 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 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 includes technical and organisational measures and internal policies to prevent unauthorised access, loss or use of personal information. Measures used include the physical securing of hard-copy records, access control to electronic records and off-site data back-ups. In addition, only those employees, office-bearers and service providers that require access to your information to discharge their functions relating to our business and the services we provide are permitted access to your information and only if they have concluded agreements with / provided undertakings to us regarding the implementation of appropriate security measures, maintaining the confidentiality and processing the information only for the agreed purposes. We will inform you and the Information Regulator, if any person unlawfully obtains access to your personal information, subject to the provisions of the law.

#### **17. 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 from the Information Officer, and submit it to the Information Officer. Costs may be applicable to such request, which can be obtained from the Information Officer. Please consult our PAIA Manual for further information.

#### **18. 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 the services that we provide. You must therefore inform us as soon as any of your information has changed. Members must update their information on the membership portal or send an email to our offices.

You may also request us to correct or delete any information. Such a request must be made in writing on the prescribed form, available from the Information Officer, and be submitted to the 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 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, the corrected information will be provided to

persons to whom the information has been disclosed in the past if they should be aware of the changed information.

## **19. MARKETING OF PRODUCTS AND SERVICES**

If you have given us specific consent to do so, we may occasionally inform you, electronically or otherwise, about supplementary products and services that may be useful or beneficial to you. You may at any time withdraw your consent and opt out from receiving such information. If you are a member, you may not opt-out of membership-related communications, which are not promotional in nature.

## **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 at <http://www.rssa.co.za/>. It will also be available at our offices. 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.**

## **21. ENQUIRIES AND COMPLAINTS**

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 [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za). The RSSA would appreciate the opportunity to respond to your concerns 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.