

THE NDOH TB HEALTHCHECK RISK ASSESSMENT TOOL

PRIVACY POLICY

Privacy policy for the National Department of Health (“NDoH”) official NDoH Tuberculosis (“TB”) Risk assessment tool on the TBHealthCheck channel (“TBHealthcheck”) which operates on the ContactNDoH Service (“the Service”). You have already consented and agreed to the Privacy Policy for the Service.

We comply with the Protection of Personal Information Act, 4 of 2013 (the Act) when processing your personal information (“PI”) on TBHealthCheck. Processing includes collecting, using, storing, retrieving, disseminating and destroying. Your rights are fully set out in the Act. PI is information about a data subject, who is an identifiable living natural person (i.e. you).

CONSENT: You consent to us processing your PI in accordance with the provisions of this policy in accordance with the lawful purpose. You consent to your PI being processed outside of your country where necessary and to us sharing and disclosing your PI for the lawful purpose.

WE COLLECT

- Your phone number and WhatsApp username directly from you through HealthCheck
- If you send messages to TB HealthCheck, we will receive the information that you include
- Location (Town/City/ Country or a Location Pin), age, gender, symptoms and exposure to infected persons and underlying medical conditions
- the name of your network operator and the country in which your network operator is located
- details of the menu items you select

Communications using WhatsApp are secured with end-to-end encryption (WhatsApp’s privacy policy at <https://www.whatsapp.com/legal/#privacy-policy>.)

WE PROCESS YOUR PERSONAL INFORMATION (“THE LAWFUL PURPOSE”)

- to provide you with guidance and information on Tuberculosis
- to allow you to meaningfully participate in TBHealthCheck
- to contact you to ask you for further information and to prompt you to carry out follow up self-diagnoses
- to send follow up messages via USSD or WhatsApp regarding additional treatment or information relevant to current TB symptoms you’re experiencing and follow up on whether you’ve sought necessary treatment for free at any public health facility or at your doctor
- to help us understand the current TB symptoms as possible for use in the fight against TB in South Africa and provide aggregated and anonymised information on status of Tuberculosis in South Africa
- for any other public health and public safety purposes
- to conduct research and statistical analysis and for historical purposes, including surveys
- to administer the Service, TBHealthCheck channel and the tool
- to improve the Service, TBHealthCheck channel and the tool and other communications channels that NDOH may utilise in the fight against Tuberculosis
- to keep the Service, TBHealthCheck channel and tool safe and secure and for any other purpose authorised by you or the Act.

DISCLOSING YOUR PERSONAL INFORMATION

We will not publish or sell any PI. Your PI may be shared with persons who provide services to us to the extent necessary for those persons to provide those services to us. We may disclose your PI:

- when we believe that disclosure is reasonably necessary to comply with, any applicable regulations, legal process or a government request;
- to enforce our contracts and policies;
- to protect the security and integrity of the Service as a whole and the TBHealthCheck channel and tool and to protect ourselves and the public from illegal activities; or

- to respond to an emergency which we believe in good faith requires us to disclose information.

When you are sharing your information with us you are sharing it with Turn.io and Praekelt Foundation NPC who will share your data between them. You consent to your personal information being shared between Turn.io and Praekelt Foundation NPC for the Lawful Purpose.

PROTECTING YOUR PERSONAL INFORMATION

We will take reasonable steps to keep your PI safe from loss, unauthorised activity, or other misuses. We are legally obliged to provide adequate protection for the PI we hold and to stop unauthorised access and use of personal information. The transmission of information via the internet is not completely secure. We will do our best to protect your PI but we cannot guarantee the security of your information transmitted through HealthCheck; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. HealthCheck may, from time to time, provide links to external sites which have their own privacy policy relating to your PI. Review that site's privacy policy before you provide PI. We are not responsible for the privacy policies or the content of such sites.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

If you want to exercise any of the above rights or complain, email us at complaints@health.gov.za and/or complain to the Regulator of the Act. Your email should provide evidence of who you are and set out the details of your request (e.g. the PI, or the correction, that you are requesting).