

TBCONNECT HEALTHCHECK

PRIVACY POLICY

(“THIS POLICY”)

This is the privacy policy for the National Department of Health (“NDoH”) Risk assessment tool (“TBHealthCheck”).

We treat your privacy seriously. We comply with the Protection of Personal Information Act, 4 of 2013 (the **Act**) when dealing with personal information. All definitions contained in this privacy policy accord with those as included in the Act.

Personal information (PI) is information about a data subject, who can be an identifiable living natural person (i.e. you) or a juristic person (i.e. a company). PI does not include any anonymous, de-identified, or statistical information that cannot be linked back to you. Special PI is PI that is regulated by Chapter 3 Part B of the Act.

We want you to understand who you are sharing your PI with, what kind of PI we are processing and how we use it.

CONSENT

We will not process your PI except as set out in this policy.

By continuing to use this service, you voluntarily consent to us processing your PI in accordance with the provisions of this policy in accordance with the lawful purpose. This policy does not limit or exclude any of your rights under the Act.

CHANGES TO THIS POLICY

We may change this policy from time to time. You can check the latest policy at any time by typing MORE in the chat.

WHAT TYPE OF PERSONAL INFORMATION DO WE COLLECT

Directly from you

We collect the following PI and Special PI directly from you:

- If you communicate with us using TBHealthCheck, we will receive your phone number and WhatsApp username if via WhatsApp.

- We confirm that the use of TBHealthCheck is not targeted at children. However should you as an adult and competent person as defined in the Act, access this site on behalf of your child or allow your child (or a child for which you are the competent person as defined in the Act) to access this site using either your phone number or their own, they do so with your consent as a competent person and in accordance with the provisions set out below regarding access by children to TBHealthCheck.
- If you, as an adult, interact with the service using any of the risk assessment tools on TBHealthCheck we will receive the information that you submit in your responses. The PI that may be collected is in response to the following questions:
 - Location (Province and Town or Location Pin). You don't have to provide us with location information. If you choose to tell us your location, we will collect that information
 - Age category
 - Gender
 - Exposure to infected persons
 - Existing underlying medical conditions
- If you send messages to TBHealthCheck, we will receive the information that you include in your message.

Communications using WhatsApp are secured with end-to-end encryption, which means that WhatsApp and other third parties cannot read or access them. For more details, see WhatsApp's privacy policy at <https://www.whatsapp.com/legal/#privacy-policy>.

Automatically when you use TBHealthCheck

- we may collect the name of your network operator and the country in which your network operator is located
- we will record details of the menu items you select

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

We process your PI:

- to provide you with information on Tuberculosis
- to allow you to participate in the TBHealthCheck self-diagnosis process. If you choose to do so then this will allow us to:
 - contact you, including to ask you for further information and to prompt you to carry out follow up self-diagnoses
 - to send follow up messages via SMS or WhatsApp regarding additional treatment or information relevant to any current TB symptoms you may be experiencing and to follow up on whether you have sought necessary treatment

- help us understand the current TB symptoms of as many South Africans as possible for use in the fight against TB
- help us provide aggregated and anonymised information to South Africans on status of TB in South Africa and other data about the wellbeing of our population
- for any other public health and public safety purposes including for historical, statistical or research purposes to the extent that the serves a public interest and the processing is necessary for the purpose concerned
- to respond to any questions you share with us via TBHealthCheck
- to conduct research and statistical analysis (including via surveys and A/B testing), which will also develop, test and improve TBHealthCheck and allow us to test and troubleshoot new products and features for TBHealthCheck.
- to administer TBHealthCheck and for internal operations, including troubleshooting and testing
- to improve TBHealthCheck and other communications channels that the South African Government may utilise in the fight against TB
- to keep TBHealthCheck safe and secure
- for any other purpose authorised by you or the Act

DISCLOSING YOUR PERSONAL INFORMATION

We will not publish or sell any personally identifiable information.

Your PI may be shared with persons who provide services to us (e.g. research services or hosting, maintenance and support of the technologies used to provide this channel), to the extent necessary for those persons to provide those services to us. Those persons may be located outside of South Africa. This may mean your PI is processed outside of South Africa. You consent to your PI being processed outside of South Africa but only to the extent that we ensure that sufficient technical safeguards are in place to protect your PI to the same level as that which we operate . We will only share your PI for the Lawful Purpose.

When you are sharing your information with us you are sharing it with Praekelt PBC, Benefit Corporation (“Turn.io”) and Praekelt Foundation NPC (“Praekelt.org”), 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 as they process your PI on our behalf. Any of the foreign entities with whom Praekelt.org shares your PI will be bound contractually as per Section 72(1)(a) of POPIA to protect any information.

If you use the TBHealthCheck channel for self-diagnosis, we may recommend as a result of your self-diagnosis that you contact your health practitioner to assist with testing, diagnosis and advice.

We may disclose your PI:

- when we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or a government request;
- to enforce our contracts and policies but only in accordance with the provisions of the Act;
- to protect the security and integrity of the Service;
- to another person authorised by you;
- to protect ourselves and the public from illegal activities in accordance with the Act; or
- to respond to an emergency which we believe in good faith requires us to disclose information.

We may disclose aggregated and anonymised information to third parties, both in South Africa and overseas including for study and research purposes and to help other countries combat TB.

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. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your PI, we cannot guarantee the security of your information transmitted through TBHealthCheck; 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.

TBHealthCheck may, from time to time, provide links to external sites. If you follow a link to another site, the owner of that site will have its own privacy policy relating to your PI. We suggest you review that site's privacy policy before you provide PI. We are not responsible for the privacy policies or the content of such sites.

PROCESSING PERSONAL INFORMATION OF CHILDREN

While this service is targeted to adults (over the age of 18) and we do not market this service or target it towards children, we recognise that TBHealthCheck may be accessed and utilised by children given its public health benefit and service to all persons residing in the Republic of South Africa. We also recognise that as parents and other competent persons you may wish to access TBHealthCheck on behalf of your children or those children under your care.

We have therefore taken the following additional personal information security steps to ensure that to the extent that TBHealthCheck is accessed by or on behalf of children: -

- No personally identifying information about a child/children (who is identified as a child) and who access/es TBHealthCheck is collected other than the mobile phone number and WhatsApp name used by the child to access TBHealthCheck.
- No further personally identifying information about a child/children who access TBHealthCheck is collected. This is confirmed by including additional gateways to TBHealthCheck that requires the age of the person taking a TBHealthCheck to be included and if the person (for whom the TBHealthCheck is being conducted) is a child, no questions are included in the assessment that could directly or indirectly identify that child nor is any personally identifying information about that child collected, processed or stored;

You confirm that as a competent person, you consent to your child accessing TBHealthCheck and consent that should your child (the child under your care) utilise his/her own mobile telephone, we can collect only the mobile phone number and WhatsApp name used by the child to access TBHealthCheck.

If you think that we have unlawfully collected and stored PI from or about a child (someone who is under the age of 18), please contact us at complaints@health.gov.za

ACCESSING, CORRECTING & DELETING YOUR PERSONAL INFORMATION

Your rights are fully set out in the Act, these rights include the right to be notified that PI is being collected, access your PI that we hold and to request a correction to, destruction of or deletion of your PI. You have the right to withdraw your consent to your PI being processed at any time and the easiest way to exercise this right is to opt out of the Service. Before you exercise these rights, we will need evidence to confirm that you are the individual to whom the PI relates.

If you want to exercise any of the above rights or complain, email us at complaints@health.gov.za . 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). If you are a resident in South Africa, you can lodge a complaint to the Regulator you can lodge a complaint to the Regulator at complaints.IR@justice.gov.za. There is no charge for lodging a complaint.