



CHRISTINE COPLEY

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Privacy of Personal Information Statement

The Protection of Personal Information Act, 2014 (POPIA) came into effect on 1 July 2020, with a year's grace period to comply, ending on 30 June 2021. This act builds on existing healthcare data privacy rules, strengthening many key areas.

Your privacy is important to me, and I want to communicate with my clients and deal with your Personal Information in a consensual manner and in line with South African privacy laws, including the POPIA.

Application of this Privacy Statement (Section 18.1)

This Privacy Statement explains how the Practice of Christine Copley (referred to as "the Practice", "I", "me", or "myself") handles your Personal Information and any Personal Information about others which you may share with the Practice. It details how I collect your Personal Information, why I collect it, and with whom I may share it. This Privacy Statement also discloses your rights regarding your Personal Information. It applies to all your Personal Information, including data which is stored electronically or in hard copy, as well as Special Personal Information regarding racial or ethnic origin, political opinions, religious or philosophical beliefs, and the processing of genetic information, biometric information for the purpose of uniquely identifying a natural person, information concerning health or information concerning a natural person's sex life or sexual orientation, and information relating to criminal behaviour.

What Personal Data may we collect about you [Section 18(1)(a)]

The Practice collects, processes, and stores your Personal Information, which can come directly from you or from third parties with whom we contract or provide services or for compliance reasons. Personal Information includes all information that identifies you or can be used to identify you/your child.

The information we process about you/your child, may include the following categories of Personal Information:

- Name & surname
- Age and date of birth
- Demographic data
- Personal contact information (address, telephone, email address)
- Medical scheme information
- Communication and other personal preferences
- Payment related information
- Health and other special personal information

We may process your Personal Information for the following purpose [Section 18(1)(c)]

As a health care professional, I collect, process and store your Personal Information in order for me to continually assess, treat and manage your clinical best interest. I maintain records about your health and any treatment or care you have received previously. These records help to provide you with the best possible healthcare.

The health records may be electronic, on paper or a combination of both, and I use a combination of working practices and technology to ensure that your/your child's information is kept confidential and secure. Records which the Practice hold about you may include the following information:

- Details about you/your child, such as your address; referring professional; emergency contact details.
- Any contact the Practice has had with you/your child, such as appointments; practice visits; emergency appointments; etc.
- Notes and reports about your/your child's health.
- Details about your/your child's treatment and care.
- Relevant information from other health professionals, teachers, relatives or those who care for you/your child.

Other purposes for retaining records may include:

- To be used for administrative or other purposes
- To be kept for historical purposes
- To promote good clinical practices
- To make case reviews possible

I will use your Personal Information only for the purposes for which it was collected and agreed with you.

Is the supply of the information voluntary or mandatory [Section 18(1)(d)]?

Supplying of certain types of information is mandatory. Section 13 of the *National Health Act, 2003*, provides that the person in charge of the practice must ensure that a health record containing such information as may be prescribed is created and maintained for every user of health services. Paragraph 4.1 of the *Health Professions Council of South Africa's Booklet 9: Guidelines on Keeping of Patient Records* provides that we must enter and maintain at least the following information for each patient consulted:

- Personal (identifying) particulars of the patient.
- The bio-psychosocial history of the patient.
- The time, date and place of every consultation.
- The assessment of the patient's condition.
- The proposed clinical management of the patient.
- Details of referrals to specialists, if any.
- Test results.
- Any information regarding school attendance or functioning at school/home/extra murals/general activities related to reasons for intervention.
- Written proof of informed consent, where applicable.

Consequences of failure to provide the information [Section 18(1)(e)]

If you,

- refuse to provide your/your child's personal information which I request; or
- do not consent to me handling your/your child's personal information in accordance with this Privacy Statement; or
- revoke any consent regarding the handling of your/your child's personal information by myself which you have previously given,

then such refusal or revocation of previously given consent might prevent me from performing my services to the best of my ability, and this may in turn, depending on your circumstances, adversely affect you/your child.

Laws authorizing or requiring the collection of the information [Section 18(1)(f)]

- National Health Act, 2003 - Section 13
- Booklet 9: Guidelines on Keeping of Patient Records of the Health Professions Council of South Africa (Paragraph 4.1)
- Medical Schemes Act, 1998 (Section 59(1))
- Health Professions Act, 1974 (Section 53(2))

Recipient or category of recipients of the information [Section 18(1)(h)(i)]

To deliver the best possible service, the Practice may share information (where required) with:

- ***other healthcare providers***, such as other therapists, specialist doctors, GP practices and hospitals.
- ***carefully selected third party service providers***. When I use a third-party service provider to process personal information on my behalf then I will always have an appropriate agreement in place to ensure that they keep the information secure, that they do not use or share information other than in accordance with my instructions and that they are operating appropriately. Examples of functions that may be carried out by third parties include:
 - Companies that provide IT services & support, systems which manage patient facing services (such as our website and service accessible through the same); data hosting service providers; systems which facilitate appointment bookings; document management services etc.
 - Medical Schemes.
 - Accounting and Tax related services.
- ***disclosures authorized by law***. There are limited situations in which I am legally required to disclose your personal information without your consent. These situations include (but are not limited to) reporting child abuse, or by order of the court.

How can you access, rectify or object to the personal information that you have provided [Section 18(1)(h)]?

I will store your Personal Information for a period of 6 years. In the case of a minor, Personal Information will be stored until the age of 21 years.

You have the rights, as listed below, in relation to your Personal Information. I will seek to deal with your request without undue delay, and in accordance with the requirements of any applicable laws. Please note that I may keep a record of your communications to help me resolve any issues which you raise.

- ***Right to request a copy***: You have the right to request a copy of the Personal Information I hold about you. I will respond to your request within 30 days (although I may be permitted to extend this period under certain circumstances). Please note that any such access will be subject to the payment of a legally allowable fee.
- ***Right to object***: If I am using your information as I deem necessary, for legitimate reasons, and you disagree, you have the right to object. I will respond to your request within 30 days (although I may be allowed to extend this period in certain cases).
- ***Right to withdraw consent***: Where I have obtained your consent to process your personal information for certain activities, you may withdraw your consent at any time. Please note that the withdrawal of consent could affect the ability of the Practice to provide services.

- **Right to erasure:** In certain situations, you have the right to request that I “erase” your personal information. I will respond to your request within 30 days (although I may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If I do agree to your request, I will delete your information.
- **Right of data portability:** If you wish, you have the right to transfer your information from myself to another service provider.

Objections/Complaints:

If you have any concerns about how your information is managed at the Practice or any aspect of this Privacy Statement, please contact the Practice Information Officer, Christine Copley. If you remain dissatisfied following a review by the Practice, you have a right to lodge a complaint with the Information Regulator as below.

Information Regulator:

Chief Executive Officer: Mr. Mosalanyane Mosala

Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 / P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints: complaints.IR@justice.gov.za

Website <https://www.justice.gov.za/inforeg/contact.html>

If you would like to know more about your rights in respect of the personal data the Practice holds about yourself, please contact the Information Officer as below.

Information Officer:

Information Officer: Christine Copley

Address: 11 Tester Street, Vierlanden, Durbanville, 7550.

Tel No.: 0637486079

Email Address: chriscopleyrc@gmail.com

Amendments to the Privacy Statement:

It is important to note that this Privacy Statement may be amended from time to time. I will on an ongoing basis, continue to review the Practice’s security controls and related processes to ensure that your personal information remains secure

If you consent to your data being used for the purposes as described in this privacy statement, then please note that when you sign the Client Information & Consent Form, reference is made to your consent in this regard.