

Registration Number: 4590260396

**Beethoven Recovery Centre (Pty) Ltd**  
**(hereinafter referred to as “BRC” or “the Company” or “We”)**

**MANUAL**

**To address**

**Requirements of the**

**PROTECTION OF PERSONAL INFORMATION ACT**

**2013**

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## 1. Nature of Business

Beethoven Recovery Centre (Pty) Ltd is a licensed, private Psychiatric Hospital as well as a residential Rehabilitation Centre for people with addiction.

## 2. Company Details

Name of body:	Beethoven Recovery Centre (Pty) LTD
Information Officer:	Ms Christelle Smith
Email Address:	<a href="mailto:christelles@beethovenrecovery.co.za">christelles@beethovenrecovery.co.za</a>
Physical Address:	28 Beethoven Street (Route 511), Hartbeespoort
Postal Address:	Postnet Suite 534, Private Bag x0001, Ifafi, 0260
Telephone Number:	(+27) 12 253 9922

### 3. Wording

**Data subject:** The individual whose information BRC collects- not just applicable to a natural person (i.e. an individual) but any legal entity, including companies and also communities or other legally recognised organisations.

**Responsible Party:** Beethoven Recovery Centre. BRC has the same obligation to protect other parties' personal information- as a company this would include protecting information about patients, employees, suppliers, service providers, business partners, etc.

### 4. Processing of Personal Information

BRC takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy law. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by BRC.

### 5. Purpose of Processing of Personal Information by BRC

We process personal information for a variety of purposes, including but not limited to the following:

- To provide or manage any information, products and/or services requested by data subjects;
- To help identify data subject when they contact BRC;
- To maintain patient accounts and records;
- For recruitment purposes;
- For employment purposes;
- For general administration, financial and tax purposes;
- For legal and contractual purposes;
- For health and safety purposes;
- To monitor, access, secure and manage our premises and facilities;
- To help us improve the quality of our services;
- To transact with suppliers and business partners;
- To help recover debts;
- To carry out patient analysis;
- Complying with tax laws;
- Complying with South African laws.

## **6. Categories of Data Subjects and Personal Information Processed By BRC**

The Company may possess records relating to:

- Directors;
- Shareholders;
- Staff (incl. prospective, current and previous employees);
- Patients;
- Visitors;
- Service Providers;
- Suppliers;
- Contractors.

## **7. Recipients or categories of recipients with whom personal information is shared**

BRC may share the personal information of our data subjects for any of the purposes outlined in section 5, with the following:

- a. The BRC employees who require such personal information to perform their duties.
- b. Our carefully selected service providers who provide health and wellness services to our patients.
- c. Medical Aid Schemes.
- d. Our service providers who perform services on our behalf (Laboratories, Pharmacies, Laundromats, Accountants etc.)

We do not share personal information of our data subjects with any other third parties, except if:

- a. We are obliged to provide such information for legal or regulatory purposes.
- b. We are required to do so for purposes of existing or future legal proceedings.

We will send our data subjects notifications if we are so obliged by law, or in terms of our contractual relationship with them.

We will only disclose personal information to government authorities if we are required to do so by law.

## 8. Measures to Safeguard Personal Information

It is a requirement of the POPI act to adequately protect personal information. BRC will continuously implement and monitor technical and organisational security measures to protect the personal information we hold against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

The following reasonable technical and organisational measures have been implemented for the protection of personal information processed by BRC:

- a. The POPI policy have been implemented throughout BRC. Employees are required to adhere to data privacy and confidentiality principles and to attend data privacy training.
- b. Each new employee will be required to sign an employment contract containing relevant consent clauses for the use and storage of employee information.
- c. Every current employee within BRC will be required to sign an addendum to their employment contracts containing relevant consent clauses for the use and storage of employee information.
- d. BRC service providers and other third-party suppliers will be required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information\*.
- e. Patient information is stored in document form as well as electronically. Access to this information is limited to authorised personnel only.
- f. Archived patient information is stored on site as well as electronically. Access to these areas are limited to authorized personnel only.
- g. BRC employs up to date technology which includes physical access control, firewalls, virus protection software and update protocols.
- h. BRC make use of IT Suppliers who are responsible for system security that protects information from third party access and physical threats.
- i. The hosting company hosts the BRC website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders.

\* BRC enters into formal agreements with our third-party service providers to ensure that the data subject's information remains protected and confidential, and the information is only used for the purposes for which it has been provided. Although all attempts have been made to ensure the safety and security of the data subject's personal information, BRC is not responsible for, nor provides any warranties, nor make any representations in respect of the privacy policies or practices of any third-party service providers.

## **9. Retention of Personal Information**

BRC will only retain a data subject's personal information for as long as it's necessary to fulfil the purpose as set out (see paragraph 5) in this policy at its discretion, in physical, or electronic format, unless:

- a. Retention of the record is required or authorised by law; or
- b. The data subject has provided consent to BRC to retain his/ her records.

During the period of retention, BRC will continue to abide by our non-disclosure obligations and will not share or sell a data subject's personal information.

## **10. Access and Correction of Personal Information**

Data subjects have the right to access the personal information BRC holds about them. Data subjects also have the right to ask BRC to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, BRC may no longer process said personal information, unless otherwise permitted (as per section 9). BRC will take all reasonable steps to confirm its clients' identity before providing details of their personal information or making changes to their personal information

## **11. Transborder Flows of Personal Information**

BRC has no planned Transborder Flows of Personal Information

## **12. Amendments to This Policy**

Amendments to, or a review of this Policy, will take place on an ad hoc basis or at least once a year.