

This is a privacy statement of the South African Blood Service, (hereinafter referred to as “we”, “us”, “our”).

SANBS recognises the importance of protecting your privacy in respect of your Personal Information (as defined in the Protection of Personal Information Act, No. 4 of 2013 (POPIA), collected by us when you use our services or interact with us via our various platforms. This Privacy Statement applies to how we collect, use, process and store your personal information and, in some instances, special personal information.

It applies to personal information and in some instances special personal information of:

- Patients and Donors
- All employees and prospective employees of SANBS;
- Current and prospective third-party services providers;
- All members of the public visiting our website, which is [www.sanbs.org.za](http://www.sanbs.org.za)
- Catch all phrase – i.e. all people that interact with SANBS

This privacy statement may need to change from time to time and updated versions will be published on our website.

## 1. **Collection and processing of personal information**

We respect your privacy rights and comply with all applicable laws in handling personal information. When used in this Privacy Statement, the term "personal information" has the meaning given to it in POPIA, applicable in the Republic of South Africa. Personal information is any information that can be used to personally identify a natural or juristic person. If any information that we collect personally identifies you, or you are reasonably identifiable from it, we will treat it as personal information.

- We will only process your personal information in accordance with and to the extent permitted by law and/or with your consent.
- All personal information processed by us (whether collected by us or submitted to us by way of any of the submission interfaces available on the website), will only be processed for the purposes specified in this Statement and our PAIA manual.
  - We process some of the following applicable data elements that we collect from customers, donors, patients, employees, visitors and third-party service providers, such as:
  - Employees/ Potential Personnel / Temporary Staff – Gender, marital status; race, age, language, education information; financial information; employment history; identity number; next of kin; children’s name, gender, age, school, grades; physical and postal address; contact details; opinions, criminal behaviour and/or criminal records; well-being; trade union membership; external commercial interests; medical information.
  - Individuals - Names; contact details; physical and postal addresses; date of birth; identity number; tax related information; nationality; gender; confidential correspondence and health information (where applicable).
  - Juristic persons / entities - names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners.
  - Service Providers – Names of contact persons; name of legal entity; identity numbers of directors, physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.

## **2. Purpose for collecting and processing personal information**

We collect personal information for the following purposes:

- To establish and maintain a relationship with you;
- To conduct background checks and relevant due diligence as part of the standard recruitment processes applicable to prospective employees;
- To respond to general enquiries submitted through our “contact us” page;
- Marketing, advertising, public relations, and market research;
- Security measures in relation to physical security;
- Visitor action evaluation, interest-based and behaviour-based marketing;
- Communicating relevant information to stakeholders;
- Comply with applicable laws;
- Enforce our terms of use;
- Obtaining target group information (determination of target groups relevant for marketing purposes or other output of content);
- For the purposes of research approved by the Human Research Ethics Committee.

## **3. Disclosing personal information to third parties**

We will only disclose personal information to third parties or operators, based on you having consented thereto, it being necessary for the performance of obligations, a legal obligation providing therefore, it being necessary in pursuit of a legitimate interest, or to the extent that it is permitted by law.

We remain responsible to you for the lawful processing of your personal information.

We will never sell your personal information.

## **4. Data transfers to other countries**

SANBS shall not be entitled to transfer your personal information to a third party who does not reside within South Africa except for under the following circumstances:

- The third party concerned is subject to a law, binding corporate rules or a binding agreement which provides an adequate level of protection that:
- You consent to the transfer;
- The transfer is necessary for the performance of a contract between yourself and SANBS.

## **5. Direct Marketing, Advertising and Related Communication**

We may, if permitted to do so in terms of applicable laws, use your contact details to send you details of our products and/or services. This may also include requests to provide customer experience feedback. These communications may be sent to you in various forms (including by email) in accordance with applicable marketing laws and practices. If you indicate a preference for a method of communication, we will endeavour to use that method as indicated.

All these communications will set out how to unsubscribe from (or opt-out of) receiving future marketing communications if you no longer wish to receive such. You can also unsubscribe from receiving such communications by clicking on the unsubscribe link in the specific communication.

## **6. Security measures**

- We take appropriate, reasonable, technical, and organisational measures to prevent loss of, damage to, unauthorised destruction, or unlawful access or processing, of personal information to ensure a level of protection appropriate to the risk.
- Such measures include safeguarding the confidentiality, integrity, and availability of the personal information.
- We may keep your personal information in either electronic or hard copy form. In both cases, we take reasonable and appropriate steps to ensure that the personal information is protected.
- Your attention is drawn to the fact that data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- In implementing the above measures, SANBS will have due regard to generally accepted information security practices and procedures which may apply to it generally.

## **7. Your legal rights on accessing and correcting your personal information**

You have the right to contact us at any time to:

- Request, in writing, a description or record of any personal information about you that we may hold. Should you make such request, you will be required to provide us with sufficient evidence of your identity. We may refuse such request and/or withhold such personal information to the extent permitted by law;
- Request the rectification of any such personal information which may be is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully. It is your responsibility to ensure that we have the correct and complete information about you on record;
- Request deletion of your personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or where we are no longer authorised by law to retain such personal information about you;
- Object to the processing of such personal information, on reasonable grounds pertaining to your situation, unless such processing is permitted by law. We would ask you to address a possible complaint to us first so that we may attempt to remedy the situation as quickly and effectively as possible;
- Be notified of any access or acquisition of personal information by an unauthorised person.

Details on how to make a request are available in our PAIA Manual. When making a request, we will require adequate proof of your identity. We will try to provide you with suitable means of accessing information, where you are legally entitled to it, by for example, posting or emailing it to you.

There may be instances where we cannot grant access to your personal information. For example, if access would interfere with the privacy or fundamental rights of others, or would result in a breach of confidentiality, we may need to refuse access. If we refuse access, we will give written reasons for the refusal.

We may charge a reasonable fee to cover our administrative and other costs in providing information to you. We will not charge for making a request or for making any corrections to personal information.

## **8. Data retention, storage, and anonymization**

- Personal information stored by us will be destroyed and de-identified as soon as they are no longer required for their intended purpose and there are no legal storage obligations to prevent deletion.
- If the personal data are not deleted because their processing is necessary for other and legally permissible purposes, the processing is restricted. This means that the personal data is blocked and not processed for other purposes.

## **9. Enquiries and complaints**

If you believe that your personal information has been unlawfully used, accessed or acquired, you may send a formal complaint to [secretariat@sanbs.org.za](mailto:secretariat@sanbs.org.za), and accompanied by details of the incident so that we can investigate it.

We will treat your complaints confidentially (unless otherwise required by law), investigate those complaints and aim to ensure that they are resolved within a reasonable time, to provide you with feedback.

## **10. Information Regulator**

The Information Regulator is a juristic person established in terms of section 39 of the Act. The power, duties and functions of the Information Regulator are to provide education, to monitor and enforce compliance, examine any proposed legislation, report to the Minister and Parliament the results of such an examination, consult with interested parties, and to handle complaints.

You also have the right to contact the Information Regulator at [www.justice.gov.za/inforeg/contact.html](http://www.justice.gov.za/inforeg/contact.html). If you want to lodge a complaint with the Information Regulator at [complainants.IR@justice.gov.za](mailto:complainants.IR@justice.gov.za)

## Revision Summary

VERSION NUMBER	REVISION DETAILS
0	<ul style="list-style-type: none"><li data-bbox="352 239 603 264">• New document</li></ul>