



SMARTBLADE

VIDEO LARYNGOSCOPE

SMARTBLADE PRIVACY POLICY

1 INTRODUCTION

SmartBlade Proprietary Limited (“**we**”, “**us**”, “**our**”) respects, and is committed to ensuring, the privacy of every person who visits or uses this website and/or our mobile application, every person who subscribes to use the services detailed on this website and/or our mobile application (“**our services**”), and persons in respect of whom our services are used and whose personal information is stored by us through provision of our services. This privacy policy (“**Policy**”) has been put together to explain how we may collect, use, share, retain and generally process personal information when you use this website, our mobile application or through provision of our services. Please bear in mind that this Policy applies to personal information in relation to your use of this website, our mobile application and our services only (and not in relation to your use of any websites or mobile applications that are not owned, or services that are not provided, by us).

For purposes of this Policy, “**personal information**” means information that can be associated with an identified or identifiable person (including name, contact details, payment card number, financial account details, date of birth, identification-related information). It does not include information related to an individual where the identity of that individual is not, and cannot be, known.

ANY VISIT TO OR USE OF THIS WEBSITE AND/OR OUR MOBILE APPLICATION OR ANY ACCEPTANCE BY YOU OF THE TERMS RELATED TO YOUR USE OF OUR SERVICES IS DEEMED TO INCLUDE AN ACCEPTANCE OF THIS POLICY. PLEASE ENSURE THAT YOU HAVE READ, FULLY UNDERSTAND AND AGREE WITH THE PROVISIONS CONTAINED IN THIS POLICY BEFORE BROWSING OR USING THIS WEBSITE OR USING OUR SERVICES.

Use of this website and/or our mobile application is only available to persons above the age of 18 years old and who have full legal capacity to conclude legal agreements. Unless otherwise mentioned when providing you with our services, we do not intend to, and do not knowingly, collect personal information from persons under the age of 18 years old. If you become aware that a child has provided us with personal information in violation of this Policy, please alert us at info@smartblade.co.za

This Policy may be revised from time to time to take into account any changes in applicable laws, our services, this website, our mobile application or any aspect related to our business generally. We therefore encourage you to monitor this Policy periodically to note any changes made to it. We will notify you of any major updates which we believe require notification.

2 WHAT PERSONAL INFORMATION DOES SMARTBLADE COLLECT?

We may collect certain information about you when you visit this website or use our services or mobile application, including –

- information provided by you when you use and register on this website and/or our mobile application (eg your name, contact details, email address, mailing address, credit card information or other details);
- information relating to transactions made through the use of our services (eg the amount/s involved, bank account details, the identity of the particular merchant, the payment device used to conclude the transaction, any information related to the device used by you to access our services, and information that provides us with an idea as to the location at which you use/d our services);



- information from third party sources (eg merchants, data providers, credit referencing agencies, to the extent permitted by law);
- information regarding your patients in respect of whom our services are used, for maintenance of clinical records to the extent strictly required by, or permissible in terms of, the National Health Act 61 of 2003 and/or any other applicable laws ("**clinical information**"). In this regard, you represent and warrant that you have obtained the legally required consent from your patients for provision of their personal information to us for purposes of our services and all purposes contemplated in this Policy; or
- any other information collected when you communicate with us in any way.
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We do not, and will not (unless we are strictly required by law) process the following categories of personal information –

- race or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union memberships;
- genetic or biometric data; and
- sex life or sexual orientation.

3 **HOW DOES SMARTBLADE USE YOUR PERSONAL INFORMATION?**

We use the personal information provided by you to ensure that you have positive customer experience, and in particular for the following purposes ("**Purpose/s**"):

- providing you with those of our services which you have requested, and notifying you about important changes or developments to those services;
- verifying your identity before your use of any one of our services;
- if applicable, storing your credit card information in order to expedite future orders, and to automate the billing process;
- responding to your enquiries and complaints or processing your requests in relation to your personal information;
- following up with you as part of our customer care procedures;
- internal record keeping and updating our records with changes to your personal information;
- improving our products and services;
- crime detection, prevention and prosecution;
- competitions and other promotions;
- marketing our services to you;
- evaluating the effectiveness of our marketing;
- research, training and statistical analysis with the aim of improving our services;
- making this website or our mobile application easier for you to use and providing you with access to certain parts of this website or our mobile application;
- contacting you for market research purposes.
- allowing for clinician collaboration;
- providing the ability for clinical research using anonymized data; and
- maintenance of clinical records in accordance with applicable laws.

4 **HOW LONG DOES SMARTBLADE RETAIN YOUR PERSONAL INFORMATION?**

Your personal information is retained by us for our legitimate business purposes and to comply with any applicable laws and regulations. To the extent not specifically prohibited or prescribed by applicable laws, we will retain personal information processed in relation to



our services for periods that we believe are reasonably necessary to serve our legitimate business interests. In most instances any personal information, to the extent classified as clinical information, is required to be stored by clinicians, hospitals, ambulance services, etc. for an indefinite period.

When there is no longer a legitimate business need to process personal information, we will either delete or de-identify it or, if this is not possible (for example, because personal information has been stored in backup archives), then we will securely store personal information and keep it from any further processing until deletion is possible.

5 **WHAT RIGHTS DO YOU HAVE IN RELATION TO PERSONAL INFORMATION PROCESSED BY SMARTBLADE?**

Under data protection laws, you have the right to control the manner in which your personal information is processed, including the following rights–

- Right of Access. You have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and where that is the case, you have the right to request and get access to that personal data;
- Right to Rectification. You have the right to update and correct your personal information that is held by us;
- Right to Erasure (“Right to be Forgotten”). In certain cases, and to the extent not prohibited by applicable laws, you may request us to remove your personal information, partially or completely. We will advise you whether any such request is prohibited;
- Right to Restriction of Processing. You have the right request us to limit processing of your personal information to any one or more of the Purposes listed above (note that this may impact the accessibility of our services);
- Right to Object. In certain cases, you have the right to object to processing of your personal information, including with regards to profiling. You have the right to opt-out from any communications from us. You may withdraw any consent previously provided in relation to the collection, use and processing of your personal information;
- Right to be Not Subject to Automated Individual Decision-Making. You have the right to not be subject to a decision based solely on automated processing; and/or
- Right to Complain. You have the right to escalate any complaint in relation to your personal information to the applicable data protection authority.

To the extent that any of the above rights cannot be effected by you through logging into your SmartBlade account and changing the relevant details on your account profile, you may submit your request to info@smartblade.co.za.

We may charge a small fee, to the extent lawfully prescribed or permissible, for any such request where we believe the request to be unfounded, repetitive or excessive.

Before processing any one of the above-listed requests, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

6 **HOW DOES SMARTBLADE PROTECT YOUR PERSONAL INFORMATION?**

We maintain technical, physical and administrative security measures aimed at protecting personal information, that is processed by us through our services, against loss or destruction, including but not limited to the following –

- our website is scanned on a regular basis for security holes and known vulnerabilities in order to ensure that your visit to our site as safe as possible;
- we use regular malware scanning;
- personal information is stored behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are obliged to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology; and
- implementation of a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.



While we take care of the above -

- you are responsible for ensuring the security of your username and password information. You must take extreme care not to divulge this information to anyone. In this regard, SmartBlade will never ask you to disclose your password in an unsolicited communication (whether by telephone or email). You therefore indemnify us against any damages or losses that may result from your failure to ensure the security and secrecy of your username and password information; and
- the transmission of data over the internet cannot be guaranteed to be 100% secure and protected. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from via electronic transmission This is particularly true for information you send to us via email, which we cannot guarantee is protected in transit. Once we receive your information, we apply the methods mentioned above to ensure its protection while in our possession. If you are concerned about submitting your personal information to us electronically, please contact us to enquire about making other arrangements.

7 DOES SMARTBLADE SHARE PERSONAL INFORMATION WITH THIRD PARTIES

Confidentiality of your personal information, and any personal information provided by you through use of our services, is important to us. We will not sell, rent or lease such personal information to third parties. Unless we have your permission, we will not use or share your personal information in ways unrelated to the ones described in this Policy or disclosed to you when you provide us with any personal information.

There are instances when we need to share certain personal information with third parties ([current third parties used can be found through clicking this link](#)), all to the extent necessary for, and incidental to, the performance of our services and/or your use of this website or our mobile application. These include sharing personal information with –

- members of the SmartBlade group of companies;
- entities who provide services to SmartBlade;
- entities with whom we have partnered to jointly create and offer our services.

Through your use of our services and website and/or our mobile application, you consent to the sharing of personal information in the above instances.

Given the nature of our business and information technology infrastructure, personal information may be transferred to other countries, some of which may have different data protection laws to those that are applicable in the country in which you reside. We will at all times ensure that personal information is protected in terms of this Policy. You consent to your personal information being transferred to other countries regardless of the data protection laws applicable in those countries.

8 DOES SMARTBLADE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

COOKIES

Cookies are small pieces of data, that act as a tracking file, sent from a website and stored on the user's computer by the user's web browser while the user is browsing. A cookie enables us to analyse usage patterns on our website and tailor the website to your needs. Most web browsers are set to accept cookies, however if you do not wish to accept cookies you can adjust your internet browser settings to refuse the cookies. Please note that some parts of this website may not function fully if you disallow cookies.

Cookies do not personally identify you, but rather your browser. The cookies simply operate as a unique identifier, which help us to know what our users find interesting and useful in this website. We do not link this information back to other information that you have provided to us, unless required by law. We do not store any personal information inside cookies.

We use cookies to enhance your SmartBlade customer experience. By continuing to use our website without changing your browser's settings, you agree to our use of cookies.

We may engage third party services from time to time for website monitoring, reporting and analysis purposes. Those services may also use cookies and gather anonymous web usage information (as described above) through this website.

Note that we do not use cookies for tracking purposes.

OTHER TRACKING TECHNOLOGIES



Do Not Track (“DNT”) is a web browser setting that requests that a web application disables its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites you encounter while browsing to stop tracking your activity. We honour DNT signals and do not track, plant cookies, or use advertising when a DNT browser setting is activated.

9 **CONTACT US**

Should you have any queries regarding this Policy or the manner in which your personal information is processed, please feel to contact us as follows -

www.smartblade.co.za

info@smartblade.co.za