

## DATA PROTECTION DECLARATION

We are delighted that you have shown interest in our community. Data protection is of a particularly high priority for **The Association of Palliative Care Practitioners of South Africa (PALPRAC)**.

This privacy notice explains how we process your personal information when you visit our website / register for an event and/or if you choose to be a member of ours. It explains how we will protect data subjects {your} information and personal data, and the controls and safeguards we provide for this data. This includes understanding, at all times, precisely what data we are storing for and about you, who (if anyone) can see that data, and whether you give permission for that data to be shared with third parties.

The processing of personal data, such as the name, address, e-mail address, or telephone number shall be in line with the Protection of Personal Information Act (POPIA).

By means of this data protection declaration, we would like to inform you of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

### Topics

- **Who we are?**
- **The information we collect about you, why we need it and who it's shared with?**
- **Our website uses cookies, this is what they do, and this is how you can stop them**
- **Access to your personal data and rights to correct, restrict or delete that data**
- **Other websites**
- **How long we keep your data**
- **How to contact us or make a complaint**

### Who are we?

**PALPRAC** is a members' association of healthcare practitioners with qualifications or a special interest in palliative medicine or care. As a registered, NPO our objective is to improve access to palliative care to all patients and their families suffering from serious illness within South Africa.

**The information we collect about you, why we need it and who it's shared with?**

The personal data we may collect from you and process is:

Data Type	Source(s)
First Name & Last Name	Online Application Form for the PALPRAC Membership community.
Email Address	Online Application Form for the PALPRAC Membership community.
Mobile number	Online Application Form for the PALPRAC Membership community.
Name of Institution, Organisation or Practice	Online Application Form for the PALPRAC Membership community.
Website of Institution, Organisation or Practice	Online Application Form for the PALPRAC Membership community.
Address of Institution, Organisation or Practice	Online Application Form for the PALPRAC Membership community.
Registration numbers of professional bodies (HPCSA, BHF)	Online Application Form for the PALPRAC Membership community.
Educational qualifications	Online Application Form for the PALPRAC Membership community.
Scope of your palliative care experience and practice	Online Application Form for the PALPRAC Membership community.

**The personal data we collect will be used for the following purposes:**

In order for us to provide you with membership and related services (including the signposting of related network conferences and training opportunities, member & non-member research, events, news and/or services) we need to collect personal data for correspondence purposes and service provision. Service provision includes interactions with stakeholders such as Medical Schemes and the Department of Health, to expand access to palliative care and supporting providers in doing so.

This data gives a helpful overview of palliative care services available in South Africa, assisting with strategy in expanding this access.

We are committed to ensuring that the information we collect, and use, is appropriate for this purpose and does not constitute an invasion of your privacy.

## The legal basis for the processing of your personal data:

- Our legitimate interests as a data controller
- The processing is necessary to fulfil a contract/enter into negotiations for a contract of consent

## Processing through use of our Legitimate Interests

Where the processing of personal data is based on the POPI Act, the legitimate interests we pursue are to carry out a business in favour of the well-being of all our members and for the good of the membership sector.

We consider that membership and association professionals rely on being kept up to date about new and existing information pertaining to the development of Palliative Medicine in (South) Africa, whether it be of a clinical, educational or service provision nature.

We will only process your personal data on these grounds if we have determined that our services are 'professionally relevant' to you and your organisation. Material that we send to you may be relevant based on your profile, because of the type, size or location of the practice, institution or organisation that you work in, or because you are the right post-holder for a certain set of decisions based on factors like your roles and responsibilities.

***We believe that the recipients of our communication have a reasonable expectation that PALPRAC will process their Personal Data.***

***The likelihood of impact and the severity of negative impact of our processing on your data has been preliminary assessed and deemed to be negligible.***

The data we hold about you may have originated from joining the PALPRAC Membership community via our online membership management platform, Glue Up (<https://palprac.glueup.com>); or signing up during an event registration on Glue Up.

## Where we store information collected about you

We may transfer your information to our data processors within and outside the South African Area but will do so with appropriate measures and controls in place to protect that information in accordance with applicable data protection laws and regulations and regulatory guidance. In all instances, we will take into account the nature of the information we are transferring, and the level of protection provided by those processors.

## Contractual Processing

Where the processing of personal data is based on the performance of a contract, then Members of PALPRAC agree that processing takes place to fulfil an ongoing membership contract with its associated terms and conditions.

This means, for example, we will collect, store, structure and use your personal information for the transmission of digital communications related to the administration of your membership; for example essential communications such as the PALPRAC newsletter, surveys relevant to our palliative care community and alerting members of new events.

## Processing using Consent

There are certain circumstances, particularly in regards to electronic marketing communications that fall within the Privacy and Electronic Communication Regulations; where we are likely to need consent from you in order to process your data. If this is the case, we will ensure that the consent that you provide is by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of your agreement to the processing of personal data relating to you.

You may withdraw consent at any time by either unsubscribing (via the Unsubscribe link on the footer of all emails) or requesting to unsubscribe via the following email address – [info@palprac.org](mailto:info@palprac.org).

## Who your information is shared with?

PALPRAC will share your personal data with third parties for the purposes of essential member service processing. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Organisation	Purpose	Country	Retrieve a copy of the safeguards in place here:
Glue Up	Processing, hosting of member and profile holder details and Email Communication Delivery	South Africa (SA)	GLUE UP <a href="#">Privacy Policy</a> support@glueup.com <b>Physical Address</b> Block 1, Pendoring Office Park Pendoring Rd, Blackheath Johannesburg, 2195 South Africa +27 79 391 7333
Alignd and other medical schemes	Verification of PALPRAC membership and member details including BHF and HPCSA numbers	South Africa (SA)	
Google Workspace	Email, document management, and collaboration needs	International	
Xneelo	Server management, data backups	South Africa (SA)	Xneelo have updated their <a href="#">Terms of Service</a> to include further terms relating to Data Protection (clause 19) and updated their <a href="#">Privacy Policy</a> .
Combrinum	Invoicing membership and event fees	South Africa (SA)	<a href="mailto:info@palprac.org">info@palprac.org</a>

## Data Handling and Protection in Google Workspace

PALPRAC utilises Google Workspace for our email, document management, and collaboration needs. Google Workspace employs a comprehensive set of security and privacy measures to protect our data:

- **Data Encryption:** Our data is encrypted both in transit and at rest using industry-standard protocols.
- **Access Controls:** We implement strict access controls to ensure only authorized personnel can access sensitive data.
- **Data Centers:** Our data is stored in Google's secure, geographically distributed data centers.
- **Compliance and Certifications:** Google Workspace complies with global standards such as GDPR, HIPAA, and ISO/IEC 27001.
- **Data Privacy:** Google does not use our data for advertising and adheres to strict privacy policies.
- **Security Features:** Advanced security features like two-factor authentication and phishing protection are in place.
- **Incident Response:** Google has a dedicated incident response team to handle security incidents.
- **Data Management:** We have full control over our data, including tools for data loss prevention and the ability to manage, export, or delete data.

These measures ensure that our data within Google Workspace is handled securely and in compliance with applicable privacy laws and regulations.

## Access to your personal data and rights to correct, restrict or delete that data

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you free of charge
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** – in the event that PALPRAC refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below

*All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.*

### **Other websites**

On occasion our website will contain links to other websites. This privacy policy only applies to the PALPRAC website and Glue Up member portal. When you link to other websites you should read their own privacy policies.

### **Changes to our privacy policy**

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated on 5 August 2024.

### **How long we keep information collected about you**

Any information provided by you will be retained for as long as necessary in connection with the purposes for which it was provided, for example, to respond to your enquiry. In respect of any contact information stored within our customer relationship management (CRM) system, we will delete your details upon request.

Any information collected as part of an application for membership or Glue Up profile will be stored for the term of an individual's term of membership/profile activity and 6 months thereafter.

Any information collected about you or your activity through the use of cookies will be retained for the time periods necessary for our marketing team to report thereon.

### **How to contact us in regard to your rights or make a complaint**

In the event that you wish to make a complaint about how your personal data is being processed by PALPRAC (or third parties above), or how your complaint has been handled, you have the right to lodge a complaint directly with PALPRAC, [info@palprac.org](mailto:info@palprac.org).