

POPIA Privacy Notice

Effective date: 01 September 2026

1. Introduction

[Practice Name] ("the Practice", "we", "us" or "our") respects your right to privacy and is committed to protecting your personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and other applicable South African laws.

This Privacy Notice explains what personal information we collect, why we collect it, how it may be used and shared, how it is protected, and the rights available to you.

2. Responsible Party

The responsible party for your personal information is:

Practice name: Smile Solutions Dental

Practice address: 75 George Storrar Dr, Groenkloof, Pretoria, 0181

Telephone: 012 346 3588

Email: reception@smilesolutions.co.za

Information Officer: Joanize Grobler

Information Officer email: joanize@smilesolutions.co.za

3. Personal Information We May Collect

Depending on your relationship with the Practice, we may collect and process:

- Your full name, identity number, date of birth and gender.
- Your residential address and contact details.
- Emergency-contact or next-of-kin information.
- Appointment and communication records.
- Medical history, current medication, allergies and relevant lifestyle information.

- Information about your symptoms, concerns, diagnosis, assessment and treatment.
- Clinical notes, prescriptions, test results, photographs and other medical records.
- Payment, billing and transaction information.
- Information required by applicable laws, professional rules or regulatory authorities.
- Digital information such as your IP address, device information and website usage information, where applicable.

Health and medical information is classified as special personal information under POPIA and will be handled with appropriate confidentiality and security.

4. How We Collect Your Information

We may collect your information:

- Directly from you when you complete a form, contact us or attend an appointment.
- From your parent, guardian or authorised representative.
- From another healthcare professional or service provider where this is authorised or necessary for your care.
- Through our website, telephone, email, WhatsApp or other approved communication channels.
- From publicly available or legally authorised sources where appropriate.

5. Why We Process Your Information

We may process your personal information to:

- Respond to your enquiry.
- Create and maintain your patient profile.
- Schedule, confirm and manage appointments.
- Assess your healthcare needs and provide appropriate care.
- Maintain accurate clinical and administrative records.

- Communicate with you about appointments, treatment, aftercare and account matters.
- Process payments and manage outstanding accounts.
- Refer you to or communicate with another healthcare professional where necessary.
- Meet our legal, ethical, regulatory and professional obligations.
- Protect the safety, rights and legitimate interests of you, the Practice or another person.
- Improve our services and internal administrative processes.
- Send marketing communication only where legally permitted and, where required, with your separate consent.

6. Legal Grounds for Processing

We will only process your personal information where POPIA permits us to do so. This may include where:

- You have provided valid consent.
- Processing is necessary to provide a service or fulfil an agreement with you.
- Processing is required by law or professional obligations.
- Processing is necessary to protect your legitimate interests.
- Processing is necessary for the legitimate interests of the Practice or another person, provided that your rights are appropriately protected.
- Processing of health information is necessary for your treatment, care or the administration of healthcare services.

Where we rely on consent, you may withdraw that consent. Withdrawal will not affect processing already undertaken lawfully or information that the Practice must retain or process for legal, clinical or professional reasons.

7. Is Providing Information Mandatory?

Providing certain personal and medical information is necessary for the Practice to assess your needs, manage your appointment and provide safe and appropriate healthcare services.

You may refuse to provide information. However, if the required information is not supplied, the Practice may be unable to provide certain services or proceed with an appointment or treatment.

8. Sharing Your Personal Information

We may share relevant personal information with:

- Healthcare professionals involved in your care.
- Laboratories, pharmacies, referral practices or other healthcare service providers.
- Payment processors, accountants and professional advisers.
- Appointment-booking, communication, cloud-storage, IT and practice-management service providers.
- Operators who process information on our behalf under appropriate confidentiality and data-protection obligations.
- Regulatory authorities, law-enforcement bodies or other parties where disclosure is required or permitted by law.
- Another party where you have authorised the disclosure.

We will only share information that is reasonably necessary for the relevant purpose. We do not sell patient personal information.

9. Digital and Automated Services

The Practice may use approved digital tools to assist with enquiries, appointment administration, reminders and routine communication. These service providers may process personal information on behalf of the Practice and must do so subject to appropriate confidentiality and security requirements.

Automated tools do not replace the clinical judgement of a registered healthcare professional. Medical assessments, diagnoses, prescriptions and treatment decisions are made by an appropriately registered healthcare professional.

10. Cross-Border Processing

Some approved technology or cloud-service providers may store or process information outside South Africa. Where this occurs, the Practice will take reasonably appropriate steps to ensure that the information receives a level of protection consistent with POPIA.

11. Security of Your Information

The Practice uses reasonable technical and organisational safeguards to protect personal information against loss, unauthorised access, misuse, alteration, disclosure or destruction.

Access to personal and medical information is restricted to authorised persons who require it for legitimate clinical, administrative or legal purposes.

Although reasonable safeguards are maintained, no electronic communication or storage system can be guaranteed to be completely secure.

12. Retention of Information

We retain personal and medical information only for as long as reasonably necessary for the purpose for which it was collected and for any period required by applicable legislation, professional rules, clinical requirements or legitimate dispute-resolution purposes.

When information is no longer required, it will be securely deleted, destroyed or de-identified, subject to applicable retention obligations.

13. Your Rights

Subject to POPIA and other applicable laws, you may have the right to:

- Ask whether the Practice holds personal information about you.
- Request access to your personal information.
- Request the correction or updating of inaccurate information.
- Request the deletion or destruction of information where the Practice is not legally or professionally required to retain it.
- Object to certain processing of your personal information.
- Withdraw consent where processing is based on consent.
- Object to direct-marketing communication.
- Lodge a complaint with the Practice or the Information Regulator.

Requests may be subject to identity verification and any lawful limitations applicable to medical records or third-party information.

14. Direct Marketing

We will only send direct-marketing communication where permitted by law. Where consent is required, marketing consent will be requested separately and will not be treated as a condition of receiving healthcare services.

You may opt out of marketing communication at any time by following the unsubscribe instructions or contacting the Practice.

Appointment confirmations, treatment-related messages, account notifications and other essential service communications are not considered marketing messages.

15. Children and Authorised Representatives

Where personal information relates to a child or a person who cannot legally provide consent, the Practice may obtain information and authorisation from a parent, guardian or other competent person as required by law.

16. Changes to This Notice

The Practice may update this Privacy Notice when its information-processing practices, services or legal obligations change. The latest version will be made available through [the Practice website/reception/email/request].

17. Contact the Practice

Questions, objections, access requests, correction requests or privacy complaints should first be directed to:

Information Officer: Joanize

Email: joanize@smilesolutions.co.za

Telephone: 012 346 3588

Address: 75 George Storrar Dr, Groenkloof, Pretoria, 0181

18. Information Regulator

If you believe that your personal information has been processed unlawfully and the Practice has not satisfactorily resolved your concern, you may lodge a

complaint with the Information Regulator of South Africa.

Website: <https://info regulator.org.za>

Complaints portal: <https://eservices.info regulator.org.za>

Telephone: 010 023 5200

Toll-free: 0800 017 160

Email: enquiries@info regulator.org.za

Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead,
Johannesburg

Privacy Acknowledgement

I confirm that I have read and understood this POPIA Privacy Notice and understand how my personal information, including health information, will be collected, used, stored and shared for the purposes described in this notice.