

Protection of Personal Information Act (POPIA) Manual

In accordance with the Protection of Personal Information Act, No. 4 of 2013 (POPIA)

Version: 1.0

Effective Date: Jan 2026

Review Date: Annually

1. Introduction

Crossman Biokineticist (“the Practice”, “we”, “our”, or “us”) is committed to protecting the privacy, confidentiality, integrity, and security of all personal information entrusted to us.

As a healthcare provider, we recognise that patients entrust us with sensitive personal and medical information. We are committed to processing this information responsibly and in accordance with the Protection of Personal Information Act, No. 4 of 2013 (POPIA), the National Health Act, the Health Professions Council of South Africa (HPCSA) ethical rules, and all other applicable legislation.

This manual explains how Crossman Biokineticist collects, uses, stores, shares, and protects personal information.

2. Purpose of this Manual

The purpose of this manual is to:

- Promote responsible processing of personal information.
 - Protect the privacy rights of patients, employees, suppliers, and service providers.
 - Ensure compliance with POPIA.
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- Explain the rights of individuals whose information we process.
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- Describe the measures implemented to safeguard personal information.
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3. Scope

This manual applies to all personal information processed by Crossman Biokineticist including information relating to:

- Patients
 - Employees
 - Healthcare practitioners
 - Contractors
 - Suppliers
 - Service providers
 - Job applicants
 - Visitors to our practice or website
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4. Information Officer

Crossman Biokineticist has appointed an Information Officer responsible for ensuring compliance with POPIA.

Information Officer

Crossman Biokineticist

Email: : **info@crossmanbio.co.za**

Telephone: **010 020 1532**

Practice Address: **Eastbury House, Hampton Office Park,**

Georgina Crescent East, Bryanston

5. Personal Information We Collect

Depending on the services provided, Crossman Biokineticist may collect the following information:

Personal Information

- Full names
- Identity or passport numbers
- Date of birth
- Gender
- Residential addresses
- Telephone numbers
- Email addresses
- Emergency contact details

Special Personal Information

As a healthcare provider, we process special personal information including:

- Medical history
- Clinical notes
- Diagnoses
- Treatment records
- Rehabilitation progress
- Medical reports
- Imaging and diagnostic results
- Medication information
- Referral letters

Financial Information

Where applicable, we may collect:

- Medical Aid information
- Membership details
- Payment records
- Invoices
- Banking details for refunds or debit orders



6. Purpose of Processing Personal Information

Personal information is processed only for lawful purposes, including:

- Providing biokinetic & physio therapy services
- Diagnosing and treating patients
- Scheduling appointments
- Maintaining patient records
- Medical Aid administration
- Billing and payment processing
- Communicating with patients
- Meeting legal and regulatory obligations
- Practice administration
- Improving service delivery

We do not collect more personal information than is reasonably necessary.

7. Lawful Basis for Processing

Crossman Biokineticist processes personal information where:

- Consent has been obtained;
 - Processing is necessary to provide healthcare services;
 - Processing is required by law;
 - Processing protects the vital interests of the patient;
 - Processing is necessary to fulfil contractual obligations;
 - Processing serves legitimate business interests while respecting individual privacy rights.
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8. Disclosure of Personal Information

Crossman Biokineticist only shares personal information where necessary and legally permitted.

Information may be disclosed to:

- Treating healthcare professionals
- Referring practitioners
- Medical Aid schemes
- Hospitals
- Pathology laboratories
- Radiology providers
- Specialists
- Legal or regulatory authorities when required by law
- Professional indemnity insurers where appropriate

HealthBox Medical does **not** sell, rent, or disclose personal information for commercial marketing purposes.

9. Security Safeguards

Crossman Biokineticist has implemented reasonable technical and organisational safeguards to protect personal information from loss, misuse, unauthorised access, alteration, or disclosure.

These safeguards include:

- Secure electronic medical record systems
- Password-protected devices
- User access controls
- Encryption where appropriate
- Firewall and anti-virus protection
- Secure backup procedures

- Locked filing systems for paper records
- Confidentiality agreements for employees and contractors
- Ongoing staff awareness and training

Access to patient information is limited to authorised personnel who require access to perform their duties.

10. Retention of Personal Information

Crossman Biokineticist retains records in accordance with:

- Protection of Personal Information Act (POPIA)
- National Health Act
- Health Professions Council of South Africa (HPCSA) guidelines
- Applicable tax and financial legislation

Records are securely destroyed once legal retention periods have expired, unless further retention is required by law.

11. Your Rights Under POPIA

You have the right to:

- Be informed about the collection of your personal information.
- Request access to your personal information.
- Request correction of inaccurate or incomplete information.
- Object to the processing of your information where permitted by law.
- Withdraw consent where processing is based on consent.
- Request deletion of personal information where legally permissible.
- Lodge a complaint with the Information Regulator.

Requests relating to personal information should be directed to the Information Officer.



12. Website Privacy

Visitors to the Crossman Biokineticist website may voluntarily provide personal information through contact forms or appointment requests.

The website may also collect limited technical information such as:

- Browser type
- Device information
- IP address
- Website usage statistics
- Cookies required for website functionality

No sensitive medical information is collected automatically through the website.

13. Cookies

Crossman Biokineticist may use cookies to:

- Improve website performance
- Enhance user experience
- Analyse website traffic
- Remember website preferences

Users may disable cookies through their browser settings; however, certain website features may not function correctly.

14. Direct Marketing

Crossman Biokineticist does not send unsolicited marketing communications.

Where newsletters or healthcare updates are distributed, they will only be sent where:

- Consent has been obtained; or
- Processing is otherwise permitted by POPIA.

Recipients may opt out of receiving communications at any time.

15. Confidentiality

Every employee, healthcare practitioner, contractor, and service provider associated with Crossman Biokineticist is required to maintain strict confidentiality regarding all personal information accessed during the course of their duties.

Confidential information will only be disclosed:

- With the patient's consent;
 - Where required by law;
 - Where necessary to provide healthcare services.
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16. Data Breaches

Should Crossman Biokineticist become aware of any security compromise involving personal information, appropriate steps will be taken to:

- Investigate the incident;
 - Contain the breach;
 - Notify affected individuals where required;
 - Notify the Information Regulator where legally required;
 - Implement corrective measures to prevent recurrence.
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17. Changes to this Manual

Crossman Biokineticist reserves the right to amend this POPIA Manual from time to time to reflect changes in legislation, operational requirements, or best practice.

The latest version will always be available on the Crossman Biokineticist website.

18. Contact Us

For questions regarding this POPIA Manual or the processing of personal information, please contact:

Crossman Biokineticist Information Officer

Email: **info@crossmanbio.co.za**

Telephone: **010 020 1532**

Website: **www.crossmanbiokineticist.co.za**

19. Complaints

If you believe your personal information has not been processed in accordance with POPIA, you may contact Crossman Biokineticist Information Officer.

If your concern cannot be resolved, you have the right to lodge a complaint with the Information Regulator of South Africa.

Crossman Biokineticist is committed to protecting your privacy and ensuring that your personal information is handled responsibly, lawfully, and securely.