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## 1.0 OBJECTIVE

Synthecon Suture Manufacturing SA cc manufactures and distributes sterile surgical sutures and ligatures to public and private health care organizations. No business unit or process at Synthecon requires the organization to generate, receive, process, store or distribute any special personal information from health care organizations data subjects which include patients, doctors, contractors or consultants among others. If however, Synthecon accesses special personal information from health care organizations, this policy shall ensure the protection and security of all special personal information in compliance with the **Protection of Personal Information Act (POPI Act or POPIA)**.

## 2.0 SCOPE AND PURPOSE

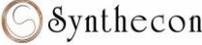
- This policy applies to all Synthecon Suture Manufacturing SA cc employees as well as agents, independent contractors, consultants, guests, customers, vendors and other non-employees.
- This policy serves to protect any special personal information that Synthecon Suture Manufacturing SA cc may access inadvertently from healthcare facilities in South Africa.

## 3.0 RESPONSIBILITY

- The Synthecon Suture Manufacturing SA cc CEO (or appointed designate) shall serve as the Information Officer responsible for ensuring that the organization complies with POPIA.
- Management is responsible for the implementing and managing compliance with this policy.
- All Synthecon employees and associated third parties shall have to comply with this policy.

## 4.0 DEFINITIONS

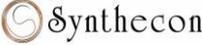
- 4.1** Health care organizations consist of any public or private healthcare institutions that procure sterile surgical sutures or ligatures from Synthecon Suture Manufacturing SA cc.
- 4.2** Data subjects for health care organizations include patients, doctors, contractors or consultants among others.
- 4.3** Special personal information (and CPI) includes any of the following special personal information from patients, doctors, contractors or consultants among other health care organizations data subjects;
- Health or clinical information
  - Religion
  - Nationality
  - Philosophical Beliefs

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- Race or ethnic origin
- Trade union membership
- Political affiliation
- Sex life
- Biometric or genetic information
- Criminal information or allegations
- Information about children less than 18 years of age

## **5.0 APPLICATION**

- 5.1** All employees are prohibited from obtaining, downloading, displaying, copying, broadcasting, sending, or distributing any special personal information obtained through health care organizations.
- 5.2** Synthecon shall not store any special personal information in any database that relates to health care organizations data subjects.
- 5.3** Synthecon shall not process any special personal information of any data subjects and store it in a record or database.
- 5.4** Synthecon shall not use any data provided by health care organizations to profile or make automated decisions that may impact the data subjects.
- 5.5** Synthecon shall not monitor the location, movement or behavior of any health care organizations data subjects.
- 5.6** Synthecon shall not perform any background checks or surveillance on any health care organizations' data subjects.
- 5.7** Synthecon shall not sell, directly market or gain any financial or further benefit through data provided by health care organizations.
- 5.8** Synthecon shall use any data provided by health care organizations for the original purpose it was intended to be used for.
- 5.9** Synthecon shall not transfer any special personal information obtained through health care organizations outside of South Africa at any point in time.
- 5.10** Synthecon shall not store credit card, banking or other confidential financial information relating to our Data subjects from health care organizations.
- 5.11** Synthecon shall employ intrusion prevention monitoring software systems such as encryption

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protocols, malware, spyware, anti-virus and firewalls to protect the organization against data breaches or the unauthorized access of Synthecon data.

- 5.12 Synthecon shall perform data backups at regular intervals and test your data restore capability.
- 5.13 All Synthecon information software systems shall comply with security and data governance standards.
- 5.14 All Synthecon managers shall immediately report to the Information Officer if or whenever any special personal information is received from health care organizations knowingly or unknowingly.
- 5.15 Synthecon shall ensure compliance to privacy regulations and data breach notification requirements. The Information Officer shall immediately notify the Information Regulator and Data subjects whenever there is a data breach.
- 5.16 Synthecon shall ensure that only a limited number of users can access Synthecon information software systems. Users shall require a username and password to ensure roles based access rights when logging onto any Synthecon information software systems.

## 6.0 REFERENCE

- Protection of Personal Information Act (POPI Act or POPIA)
- SAMED Medical Device Code of Ethical Marketing and Business Practice

## 7.0 DOCUMENT HISTORY

Page No.	Revision No.	Revision Date	Reason
All Pages	00	14-08-2020	Initial Release for QMS Implementation
	01		

APPROVED BY
Signature:
Date: