

CORNERSTONE PHARMACIES, REGISTRATION NUMBER 2014/280643/07 “CSP”
WEBSITE PRIVACY POLICY (“the Policy”)

The information, content, services and/or materials offered by Cornerstone Pharmacy on, or through its website www.cspharmacy.co.za (“the Website”), is made available subject to the provisions contained below.

Please read this Policy carefully before browsing the Website or using any of our services made available *via* the Website.

Your continued use of the Website indicates that you have read and agree to the terms of this Policy. You should not browse the Website or utilise Cornerstone Pharmacy’s services which are accessed *via* the Website if you do not accept this Policy.

1. INTRODUCTION

- 1.1. Cornerstone Pharmacy endeavours to comply with all laws and regulations providing for privacy including, but not limited to the Constitution of the Republic of South Africa, 108 of 1996 and the Protection of Personal Information Act, 4 of 2013 (“the POPI Act”);
- 1.2. Cornerstone Pharmacy is committed to protecting the privacy and security of the personal information which is obtained by it when persons browse the Website. Cornerstone Pharmacy will only process the personal information obtained by it when persons browse and utilise the Website in accordance with the terms of this Policy and the applicable laws;
- 1.3. For purposes of this Policy:
 - 1.3.1. “User/s” means the person/s who browse and/or utilise the Website, or on whose behalf the Website is accessed;
 - 1.3.2. “Personal Information” means the term “personal information” as defined in the POPI Act and means the Users’ personal information which Cornerstone Pharmacy acquires as a result of Users’ browsing and/or accessing the services made available on the Website;
- 1.4. Cornerstone Pharmacy seeks to ensure the quality, accuracy and confidentiality of all Personal Information in its possession and recognises the importance of protecting Users’ privacy in respect of the Users’ Personal Information collected by Cornerstone Pharmacy when Users browse the Website. Cornerstone Pharmacy is committed to protecting and preserving the Personal Information of all Users;
- 1.5. This Policy includes various consents and permissions by Users in respect of their Personal Information;
- 1.6. Users will be subject to the terms of the Policy in force at the time that they access the Website. The terms of this Policy may be amended by Cornerstone Pharmacy from time to time in its discretion.

2. INFORMATION COLLECTION AND USE

- 2.1. Cornerstone Pharmacy strives to collect only that Personal Information which is necessary for the intended purpose of the collection;
- 2.2. To the extent that Users elect to utilise the services offered by Cornerstone Pharmacy *via* the Website, Cornerstone Pharmacy shall require such Users to disclose certain of their Personal Information to it for purposes of rendering the services to such Users (for example first names and surnames, contact numbers and email addresses). Should Users elect not to provide the requested Personal Information to Cornerstone Pharmacy, such Users shall not be able to make use of the services offered by Cornerstone Pharmacy *via* the Website;

- 2.3. By agreeing to the terms contained in this Policy, Users consent to the processing of their Personal Information for the following purposes:
 - 2.3.1. The provision and performance of Cornerstone Pharmacy's services (and that of Cornerstone Pharmacy's service providers) to the User which are accessed by Users through their use of the Website;
 - 2.3.2. Responding to queries or requests of Users;
 - 2.3.3. Developing online user profiles;
 - 2.3.4. Understanding general user trends and patterns;
 - 2.3.5. To enable efficient use of the Website;
 - 2.3.6. For security, administrative and legal purposes;
- 2.4. The Personal Information that Cornerstone Pharmacy collects as a result of the use of the Website by Users shall only be accessed Cornerstone Pharmacy's employees, representatives, contractors and third parties on a need-to-know basis and subject to reasonable confidentiality obligations binding such persons.

3. CONSENT TO PROCESS PERSONAL INFORMATION

- 3.1. By accessing the Website, the Users agree and consent that Cornerstone Pharmacy may process their Personal Information for the purposes described in this Policy including providing Users with access to the Website and the contents of the Website;
- 3.2. By providing Cornerstone Pharmacy with their Personal Information, Users consent to having such Personal Information processed in accordance with the provisions contained in this Policy, which processing is necessary to enable Cornerstone Pharmacy to carry out the actions required of it in relation to the Users when they access the Website and the services offered *via* the Website;
- 3.3. Processing shall include the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use; dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as blocking, degradation, erasure or destruction of information;
- 3.4. Users should not browse the Website, or make use of the services offered on the Website, if they do not agree with Cornerstone Pharmacy's processing activities described in this Policy.

4. RETAINING PERSONAL INFORMATION

- 4.1. Records of Personal Information shall not be retained by Cornerstone Pharmacy any longer than is necessary for achieving the purpose for which the Personal Information was collected or subsequently processed, unless:
 - 4.1.1. Retention of the record is required or authorised by law;
 - 4.1.2. Cornerstone Pharmacy reasonably requires the record for lawful purposes related to its functions or activities;
 - 4.1.3. Retention of the record is required by a contract between Cornerstone Pharmacy, or its service provider, and the User;
 - 4.1.4. The User has consented to the retention of the record;
- 4.2. Users consent to Cornerstone Pharmacy retaining the Personal Information for the following purposes:
 - 4.2.1. Aggregate, statistical and reporting purposes and for only so long as is necessary to enable Cornerstone Pharmacy to achieve the purpose for which the Personal Information was collected or subsequently processed, subject to the further provisions of section 14 of the POPI Act;
 - 4.2.2. Cornerstone Pharmacy's operational purposes and/or for production as evidence by Cornerstone Pharmacy in legal proceedings in which event

records relating to the Users' use of the Website and the Personal Information submitted by Users may be required to be retained in terms of legislated records retention requirements;

- 4.3. Cornerstone Pharmacy shall destroy or delete records of Users' Personal Information, or deidentify such Personal Information as soon as reasonably practicable after it is no longer lawfully authorised to retain the applicable records.

5. TRANSBORDER FLOW OF PERSONAL INFORMATION

- 5.1. Cornerstone Pharmacy may appoint certain agents, third parties and/or service providers which operate outside the borders of the Republic of South Africa. As a result, Cornerstone Pharmacy may be required to transmit the User's Personal Information to foreign countries;
- 5.2. Cornerstone Pharmacy shall only transfer Personal Information of Users to a third party located in a foreign country if the third party is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection that:
 - 5.2.1. Effectively upholds principles for reasonable processing of the Personal Information that are substantially similar to the conditions for the lawful processing of Personal Information relating to a data subject who is a natural person and a juristic person where applicable; and
 - 5.2.2. Includes provisions, that are substantially similar to section 72 of the POPI Act, relating to the further transfer of the Personal Information from the recipient to third parties who are in a foreign country;
- 5.3. The purpose of the trans-border flow of the User's Personal Information may include, but is not limited to data hosting and storage;
- 5.4. By continuing to browse and use the Website, Users are deemed to consent to the trans-border flow of their Personal Information as detailed above.

6. INFORMATION AND SECURITY

- 6.1. Cornerstone Pharmacy shall secure the integrity and confidentiality of Users' Personal Information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to, or unauthorised destruction of Users' Personal Information and the unlawful access to or processing of such Personal Information;
- 6.2. While Cornerstone Pharmacy cannot warrant the security of the Personal Information provided by Users, Cornerstone Pharmacy will take reasonable measures to continue to identify all reasonably foreseeable internal and external risks to Users' Personal Information in Cornerstone Pharmacy's possession or under its control, shall establish and maintain appropriate safeguards against the risks identified, shall regularly verify that the safeguards are effectively implemented and shall ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

7. USERS PARTICIPATION

- 7.1. Users have the right:
 - 7.1.1. To be notified that their Personal information is being collected;
 - 7.1.2. To be notified in the event that the Personal Information has been accessed or acquired by an unauthorised person;
 - 7.1.3. To request Cornerstone Pharmacy to confirm whether or not it holds any Personal Information pertaining to such User and the right to request Cornerstone Pharmacy to provide the record or a description of the Personal Information about the applicable User held by Cornerstone Pharmacy;

- 7.1.4. To request Cornerstone Pharmacy to correct or delete the Personal Information that it holds on a user's behalf, in instances where the Personal Information is incorrect, incomplete, irrelevant, excessive, inaccurate, out of date, misleading or has been obtained unlawfully;
- 7.1.5. To request Cornerstone Pharmacy to destroy or delete such User's Personal Information if the information is no longer needed for the original processing purpose, alternatively if the User withdraws their consent and there is no other reason or justification to retain such Personal Information, further alternatively, if a User has objected to their Personal Information being processed and there is no justified reason for the processing of the User's Personal Information;
- 7.1.6. Not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of the Personal Information intended to provide a profile of such person;
- 7.1.7. To submit a complaint to the information regulator established in terms of the POPI Act;
- 7.1.8. To withdraw their consent to the processing of their Personal Information at any time;
- 7.1.9. To object, on reasonable grounds relating to the particular situation of the User, to the processing of the Personal Information unless the applicable legislation allows or requires such processing;
- 7.1.10. Not to have their Personal Information processed for purposes of direct marketing by means of unsolicited electronic communication;
- 7.1.11. To object to the processing of Personal Information for direct marketing purposes and to object to the processing of Personal Information processed for purposes of direct marketing by means of unsolicited electronic communications;
- 7.1.12. To institute civil proceedings regarding the alleged interference with the protection of their Personal Information.

8. LOG FILES AND COOKIES

- 8.1. When Users access the Website certain information will be automatically collected in relation to the Users' visit to the Website, such information includes but is not limited to:
 - 8.1.1. Users' browser types and versions;
 - 8.1.2. Users' operating systems and information about Users' use of the Website including details of the Users' visits to the Website (such as pages viewed and the resources that the Users accessed on the Website).
- 8.2. The Website also uses different types of cookies, such as: cookies which provide web analytics services, flash cookies and other types of cookies. Cornerstone Pharmacy's hosting agents and/or service providers may automatically log Users' "IP addresses" (the unique identifiers for Users' computers and/or other access devices). The aforesaid information collected by Cornerstone Pharmacy is for aggregate purposes only and cannot be used to identify Users personally.

9. OUR CONTACT DETAILS

- 9.1. Email address: admin@cspharmacy.co.za
- 9.2. Physical address: La Rocca Business Park, Block E, 321 Main Rd, Bryanston
- 9.3. Postal address: P.O. BOX 2967, Northcliff, 2115