



## PRIVACY POLICY

Zoie Health Technologies ( “Zoie”, “Zoie Health”, “we,” “us” or “our”) is committed to protecting the privacy of individuals, whether personally or on behalf of an entity (“users”) who access and make use of the www.zoiehealth.com website as well as any other media form, media channel, mobile website or mobile application related, linked, or otherwise connected thereto (collectively, the “Site”). This Privacy Statement describes our privacy practices in relation to the use of our Site and any services provided by us through the Site (collectively, the “Services”).

### 1. GENERAL

1.1. For purposes of this policy, “personal information” shall be defined as detailed in the Protection of Personal Information Act 4 of 2013 (POPI).

1.3. This Privacy Policy (“**Privacy Policy**”) will tell you how we protect, collect, use, disclose and store the information collected through the Services.

### 2. ACCEPTANCE

2.1. By downloading, accessing or using the Site, and/or by registering with us or providing information to us in connection with the Site, you accept the practices and policies outlined in this Privacy Policy, and you hereby consent to the collection, use and sharing of your information as set forth in this Privacy Policy.

2.2. If you are registering an account or using the Services on behalf of an individual or entity other than yourself, you represent that you are authorised by such individual or entity to accept the terms of this Privacy Policy on such individual’s or entity’s behalf.

2.3. We may change this Privacy Policy at any time and any changes to this Privacy Policy will become effective when we make the revised Privacy.

2.4. Your use of the Site is also subject to our Terms and Conditions.

### 3. RESPONSIBILITY OF THE USER

While we will at all times take all reasonable steps to ensure that all information provided to us is correct and up to date, all users accept responsibility for ensuring that the information provided to us is correct, complete and up to date. In the event that you provide information on behalf of someone other than yourself, you warrant that you have their permission to do so.

### 4. PERSONAL INFORMATION WE MAY COLLECT

4.1. Should you decide to register as a user on the Site, we will require you to provide us with personal information which includes but is not limited to -

- 4.1.1. your name and surname;
- 4.1.2. your email address;
- 4.1.3. your physical address;
- 4.1.5. your mobile number;
- 4.1.6. your medical aid details including your scheme and number, where applicable;
- 4.1.7. your identification number; and
- 4.1.8. your date of birth.

4.2. Should you decide to book a home consultation with a healthcare provider, or request medication delivery, we may require you to provide us with personal information which includes but is not limited to –

- 4.2.1. Your credit card details;
- 4.2.2. Basic health related information including the reason for the consultation and any related symptoms; and/or
- 4.2.3. Your physical address.

Please note that should your personal information change, you are requested to please inform us and provide us with the updated information as soon as reasonably possible.



You may choose to provide additional personal information to us, in which event you agree to provide accurate and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.

## **5. COLLECTION OF ANONYMOUS INFORMATION AND COOKIES**

We may collect certain Personal Data using cookies and other technologies, such as web beacons, device IDs, geolocation, HTML5 local storage, Flash cookies, and IP addresses. We specifically use browser cookies for different purposes, including cookies that are strictly necessary for functionality and cookies that are used for personalisation, performance/analytics, and advertising. When you visit the Site, we may also automatically collect certain data about your device, including information about your web browser, IP address, time zone, language preferences, and information regarding your device and browser, including device identifiers. Additionally, as you browse the Site, we may collect information about the individual web pages or services that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site

5.1. Cookies allow a small amount of information to be held related to your particular device in order for us to link your information with a particular device.

When making use of the Site, we may place cookies on your computer or device.

Cookies which are generated when you visit our Website can be accessed both by us and by you and can easily be deleted from your device. In the event that you elect to either delete cookies or to change your device settings related to cookies, you accept that you may no longer be able to access all functions or aspects of our website.

We may create de-identified or anonymous data from Personal Data by removing data components (such as your name, email address, or linkable tracking ID) that makes the data personally identifiable to you or through obfuscation or through other means. For example, we may use de-identified or anonymized data for research and development and scientific research purposes pursuant to applicable law. Our use of anonymized data is not subject to this Privacy Policy.

## **6. HOW WE MAY USE PERSONAL INFORMATION**

6.1. We will not, without your express consent use your personal information for any purpose other than as set out below:

6.1.1. to respond to your inquiries and fulfil your requests, such as to arrange delivery of orders or for the in-person consultation with a provider;

6.1.2. schedule and provide services related to the scheduling of home consults, for example, to send to you appointment confirmation; communicate with you and your Providers regarding your health status, appointments and related services provided by your Provider; obtain or facilitate payments for appointments and related services provided by your Provider and send you payment receipts; and provide you with related customer service;

6.1.3. send administrative information, including information regarding the Site, and changes to our Terms, Conditions and Policies; to contact you regarding current or new services offered by us and/or our Providers (unless you have opted out from receiving marketing material from us); to inform you of new features and/or special offers offered by us and/or our Providers (unless you have opted out from receiving marketing material from us); personalise your experience on the Application by presenting products and offers tailored to you; further our business purposes, such as quality assessment, data analysis, audits, developing new products, enhancing the Application, improving our services, identifying usage trends, developing tools which help you assess the performance, competence and qualifications of healthcare professionals and conducting training programs for such professionals, and determining the effectiveness of our promotional campaigns; or disclose your personal information to any third party other than as set out below:

- to our employees and/or Providers who assist us to interact with you via our Website and/or Application, email or any other method, for the use of the Services and thus need to know your personal information in order to assist us to communicate with you properly and efficiently;



- to law enforcement, government officials, fraud detection agencies or other third parties when we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report or support the investigation into suspected illegal activity, or to investigate violations of this Privacy Policy or our Terms and Conditions; and
- to our service providers (under contract with us) who help with parts of our business operations (fraud prevention, marketing, technology services etc). However, our contracts dictate that these service providers may only use your information in connection with the services they perform for us and not for their own benefit.

**6.2.** We are entitled to use or disclose your personal information if such use or disclosure is required in order to comply with any applicable law, subpoena, order of court or legal process served on us, or to protect and defend our rights or property. In the event of a fraudulent online payment, Zoie is entitled to disclose relevant personal information for criminal investigation purposes or in line with any other legal obligation for disclosure of the personal information which may be required of it.

**6.3.** We will ensure that all of our employees, Providers, affiliates and partners (including their employees and third party service providers) having access to your personal information are bound by appropriate and legally binding confidentiality obligations in relation to your personal information.

We will not sell your Personal Information.

We may however use personal information which relates to you in the following ways:

- Information you give to us: We will use this information to:
  - verify who you are when engaging with us;
  - carry out our obligations arising from any contracts entered into between you and us (or selected third parties) and to provide you with the information, products and Services that you request from us or selected third parties or products or Services we offer that are similar to those that you have already acquired or enquired about or that will further contribute to our philosophy;
  - notify you about changes to our (or selected third parties') products or Services;
  - ensure that Content from our website is presented in the most effective manner for you and for your computer; and
  - deal with enquiries and complaints made by or about you relating to our website or your use thereof.
- Information we collect about you: We will use this information:
  - to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our website to ensure that Content is presented in the most effective manner for you and for your computer;
  - to allow you to participate in interactive features of our Service, when you choose to do so;
  - as part of our efforts to keep our website safe and secure;
  - to measure or understand the effectiveness of advertising we serve to you and other Users, and to deliver relevant advertisements; and
  - to make suggestions and recommendations to you and other Users of our website about additional products or services that may interest you or them.

Information we receive from other sources: We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).



Submission of Personal Information on behalf of another: If you provide information on behalf of someone else, then it is your responsibility to obtain the necessary consent from such person/User before making the information available to us. On receipt of Personal Information we assume that the necessary consent has been obtained and will process the Personal Information as per your instructions. By submitting such Personal Information on behalf of another person/User, you indemnify us against any third party claim, where such third party claim relates to Personal Information which has been processed without the necessary consent or other available exception by law.

## **CHOICES AND ACCESS**

**7.1.** We give you choices regarding our use and disclosure of your personal information for marketing purposes.

**7.2.** You may opt-out from receiving marketing-related emails from us based upon your personal information.

## **HOW WE HANDLE YOUR PERSONAL INFORMATION 9.1. We will -**

**9.1.1.** treat your personal information as strictly confidential, save where we are entitled to share it as set out in this Privacy Policy;

**9.1.2.** take appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access, which measures include but are not limited to the use of Cloud based solutions, firewalls and cyber penetration testing;

**9.1.3.** provide you with access to your personal information to view and/or update personal details;

**9.1.4.** promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information;

**9.1.5.** provide you with reasonable evidence of our compliance with our obligations under this Privacy Policy on reasonable notice and request; and

**9.1.6.** upon your request, promptly return or destroy any and all of your personal information in our possession or control, save for that which we are legally obliged to retain.

**9.2.** We will not retain your personal information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

**9.3.** Zoie undertakes never to sell or make your personal information available to any third party other than as provided for in this Privacy Policy.

**9.4.** We use Trustpilot, a third-party service provider, to collect and display customer reviews on our website. In order to use this service, we collect and share the name and email address of customers, who have submitted reviews, with Trustpilot.

**9.4.1.** This information is collected and processed by Trustpilot in accordance with their privacy policy, which can be found here: [Trustpilot Legal - Privacy Policy](#)

**9.4.2.** By submitting a review on our website, you acknowledge that your name and email address will be shared with Trustpilot for the purpose of displaying your review. If you do not wish for your information to be shared with Trustpilot, please do not submit a review on our website.

**9.4.3.** We do not have control over the data processing practices of Trustpilot, and we encourage you to review their privacy policy to understand how they collect, use, and share your personal information.

**9.5.** We use Engage, a third-party service provider, to collect and manage customer data, including: name, email, and phone number, as well as tracking customer activity across all our websites.

**9.5.1.** By submitting your information on our website, you acknowledge that your information will be shared with Engage.so for the purpose of managing customer data and tracking activity. We use this information to improve our website and marketing efforts, as well as to provide you with relevant offers and promotions.



**9.5.2.** We take reasonable steps to ensure that [Engage.so](#) uses your personal information only in accordance with our instructions and for the purposes set out above. We do not sell or share your personal information with any other third-party providers for their own marketing purposes.

**9.5.3.** We encourage you to review [Engage.so's](#) privacy policy to understand how they collect, use, and share your personal information. You can find [Engage.so's](#) privacy policy here: [Privacy policy](#).

**9.5.4.** If you have any questions or concerns about how we use your personal information, please contact us using the contact information provided in this privacy policy or our websites.

## **10. CONSENT**

**10.1.** By using this site, you warrant that you are 18 years of age or older and of full legal capacity. If you are under the age of 18 or if you are not legally permitted to enter into a binding agreement, then you may use this site only with the involvement and supervision of your parent or legal guardian.

**10.2.** If your parent or legal guardian supervises you and gives his/her consent, then such person agrees to be bound by this Policy and to the Terms and Conditions and to be liable and responsible for you and all your obligations under this Privacy Policy.

## **11. DISCLAIMER**

**11.1.** Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence.

**11.2.** In the event that you disclose any personal information to a third party in the instance that any links are followed from our Website or accessed as a result of any information on our Website, Zoie shall not be liable for any loss or damage howsoever arising, as a result of such disclosure of personal information to any **third party/ies**. Once you leave our website or Application, our Terms and Conditions are no longer applicable and you are advised to familiarise yourself with the Terms and Conditions and Privacy Policies of such third party website/s.

## **12. CONTACT INFORMATION**

For more information or to access, correct, amend, delete or update any personal information or to register a complaint or review our Website or Application, you may contact our Privacy Compliance Officer at the following email address: [support@zoiehealth.com](mailto:support@zoiehealth.com)