PRIVACY, CONFIDENTIALITY & PATIENT INFORMATION POLICY

Dr Rufus Nortjé & Associates

A plain-language policy for patients, families, staff and visitors. The PAIA manual gives the full statutory record-access process and further detail on overseas data processing.

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1. Our commitment

We respect the confidentiality of every patient's information and seek to collect, use and share it only for lawful purposes and to the extent reasonably necessary. This applies to electronic records, paper documents, telephone messages, email and other communications. Access to a system is not permission to browse information without a duty-related reason.

This policy applies only to Dr Rufus Nortjé & Associates. Other independent practitioners, businesses and tenants at the same premises are responsible for their own patient information and privacy policies; this document does not apply to their records or services.

2. Information we collect and why

We may collect your contact and identification details, health history, examinations, treatment notes, investigations and results, prescriptions, referrals, correspondence, appointment and account details, medical-aid membership information and recorded privacy choices. We obtain information from you and, where justified, from your representative, treating practitioners, laboratories, radiology providers, pharmacies or your medical scheme.

We use relevant information for healthcare and continuity of treatment, appointment management, claims and payment, responding to enquiries or complaints, appropriate patient-safety checks and legal or professional recordkeeping. Additional information about staff and suppliers is collected for lawful employment and business administration.

3. Lawful processing and consent

POPIA does not require a patient's fresh signature for every necessary healthcare function. Processing must have an appropriate legal basis, and special health information remains protected by healthcare confidentiality rules. Where your consent is the legal basis or specifically required, we explain the scope and record your choice; it may be withdrawn for future consent-based processing. Some records must still be retained or used where another lawfully justified reason applies. Consent for a medical procedure is a separate clinical decision.

4. Individual patients on shared medical-aid accounts

From 16 October 2026, we are introducing a clearer individual registration and privacy procedure. **Form A** is for a first attending patient who opens a new account; **Form B** is a shorter individual privacy form for existing patients and additional family members/dependants whose administrative profiles already exist.

An ELLE family/medical-aid account may include more than one person, but each patient has a separate individual Practice Perfect clinical record. Signing an account-opening document or paying an account does not automatically authorise a main member, spouse or another adult to receive someone else's confidential results or records. Each attending patient is given the appropriate opportunity to record personal contact details, relevant permissions and restrictions.

Existing patients will be offered Form B progressively when they attend; there is no blanket recall. Earlier forms are retained and updated choices are dated accurately. A patient who does not give optional email or itemised-billing consent should be offered an appropriate alternative where feasible. Necessary care must not be automatically delayed for an administrative signature.

5. Who may access information?

Role / recipient	Limited purpose
Treating, covering and reviewing doctors	Relevant information needed for safe care, continuity, professional review or a legitimate complaint/incident investigation.
Reception, accounts and clinical administration	Information required to book, file, route results, send doctor-approved documents, handle accounts and answer authorised enquiries.
Practice Manager / Information Officer	Necessary complaint, administration and privacy-compliance information; no unrestricted clinical-file access.
External healthcare providers / schemes	Necessary lawful care, referral, testing, pharmacy and scheme claim/authorisation information.
Suppliers and professional advisers	Limited hosted-system, IT support, backup, accounting, legal or other justified services under appropriate confidentiality and security requirements.

All users remain bound by confidentiality. We verify identity and authority before disclosing clinical details. A family relationship, emergency-contact listing or financial responsibility alone is not general authority to receive another patient's health information.

6. Communication and results

Results, reports, prescriptions, referrals and clinical letters are released only through an authorised clinical process. We check the patient's identity and recipient details and use suitable protection for sensitive documents. Ordinary email, including system-generated messages, carries some risk of misdirection or overseas processing; patients may discuss an alternative contact or collection method with us. Email is not a continuously monitored emergency channel. For urgent health concerns, telephone the Practice during opening hours, obtain clinical assessment or use emergency services.

The Practice does not provide a routine WhatsApp patient-care channel through reception. Clinically important information received from another channel must be brought into the correct patient record. Telephone calls may be recorded for service and evidence purposes, subject to appropriate notice and retention.

7. Electronic records, suppliers and overseas processing

The Practice uses Practice Perfect for each person's clinical file, ELLE for appointments and accounts, and Microsoft 365 for email and authorised collaboration. Suppliers report that Practice Perfect/CIS clinical data and backups, and ELLE's main database and backups, are hosted in South Africa. Our Microsoft 365 tenant report confirms South Africa as the current and committed data-at-rest geography for Exchange Online, OneDrive, SharePoint and Teams; Exchange Online Protection currently lists Europe without a fixed geographic commitment. Some ELLE-generated emails use Twilio SendGrid, involving international processing, potentially in the USA and EU. Those messages may contain patient information, attachments and delivery or interaction data. ELLE reports PDF password protection is

enabled for relevant attachments, but it can be changed for an individual message and does not protect the email subject or body. Email delivery is not guaranteed end-to-end encrypted. Please discuss safer alternatives for sensitive communications. Remote IT support and certain onward-transfer arrangements are still being reviewed. Full details, applicable safeguards and contacts appear in the public PAIA manual.

8. Children, representatives and additional privacy restrictions

Children and adolescents have individual privacy and healthcare-consent rights that depend on the law, the healthcare service and capacity. Parents and guardians do not have unconditional access in every circumstance. If signing authority or confidentiality is uncertain, a doctor will assess it. Other representatives must demonstrate adequate authority for the particular request.

Tell your doctor or our Information Officer if you want to change a consent-based choice, use a safer contact method, object to particular processing or request that information be handled with special care. We will consider what is technically possible and lawfully required, document the outcome and avoid promising access restrictions we cannot actually implement.

9. Retention and protection

Clinical records and consent histories are retained for appropriate legal and healthcare periods. Material relevant to complaints, investigations or access requests is preserved. Where disposal is authorised, it is done securely. Staff receive confidentiality instructions and systems are subject to appropriate access controls and information-security safeguards.

10. Requests, complaints and contact details

You can ask whether we hold your information, request lawful access and corrections, object where POPIA permits and seek deletion where retention is no longer authorised. Requests are accepted through reasonable accessible channels; help is available from the Information Officer. We will assess and respond under the statutory time limits and reasons. You may also complain to the Information Regulator.

Contact	Details
Information Officer	Friedel van Wyk Nortjé | friedel@medicaljunction.co.za
Deputy Information Officer	Venessa Springbok | via enquiries@medicaljunction.co.za
Practice telephone	012 004 0441 | enquiries@medicaljunction.co.za
Physical and postal address	Office 61, Zambezi Junction Shopping Centre, 522 Breed Street, Montana Park, Pretoria, Gauteng, 0182
Information Regulator	www.inforegulator.org.za | 010 023 5200 | enquiries@inforegulator.org.za