Protection of Personal Information (POPI) and Promotion of Access to Information (PAIA) Manual including the Practice Privacy Policy

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1. Introduction

The Practice is a South African business that operates as a healthcare Professional.

The Promotion of Access to Information Manual "Manual" provides an outline of the type pf records and the personal information it holds and explains how to submit requests to access to these records in terms of the Promotion of Personal Information Act 2 of 2000 ("PAIA Act"). In additional it explains how to access or object to personal information held by the company, or request correction of the personal information, in terms of the Protection of Personal Information Act 4 of 2013 ("POPI Act").

The PAIA and POPI Acts give effect to everyone's constitutional right of access to information held by companies, if the record is required for the exercise or protection of any rights.

Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and Tariff are dealt with in section 5.

2. Practice Contact details

Dr Sabatta Christopher Tsotetsi

Suite 301, Mediclinic Heart Hospital, 551 Park Street, Arcadia, 0083

Montana Hospital
CNR Dr Swanepoel Rd, and, Rooibos Rd, Montana Park, Pretoria, 0159

Contact email: doctor@tsotetsivascular.co.za

Information Officer: Dr SC Tsotetsi

3. Company Records

3.1 Practice records availability

Departmental records	**Subject**
Financial Records	Accounting records Annual Financial Report Annual Financial Statements Asset Registers Bank Statements Banking details and Bank accounts Banking records Debtors/creditors statements and invoices General ledger and subsidiary ledgers Invoices Tax returns

Income Tax Records	PAYE records & IRP5 VAT SDL & UIF Workmen's Compensation
Personnel	Address lists Disciplinary records Employment contracts Grievance procedures Leave records. Payroll register Salary records Training records
Procurement	Standard terms and conditions for supply of services and products Contractor and client agreements List of suppliers, products, services, and distribution.
Marketing and Communications	Events Emails
Clients	Client records Client interactions Client training Client presentations
IT department	Computer usage policy documentation Information security policies Software licenses System documentation and manuals

3.2 **Description of records available in accordance with any other legislation**

3.2.1 Basic Conditions of Employment Act, No 75 of 1997;
3.2.2 Broad- Based Black Economic Empowerment Act, No 75 of 1997;
3.2.3 Companies Act, No 71 of 2008;
3.2.4 Compensation for Occupational Injuries & Diseases Act, 130 of 1993;
3.2.5 Constitution of the Republic of South Africa 2008; of 2005;
3.2.6 Employment Equity Act, No 55 of 1998;
3.2.7 Financial Intelligence Centre Act, No 38 of 2001;
3.2.8 Income Tax Act, No 58 of 1962;
3.2.9 Labour Relations Act, No 66 of 1995;
3.2.10 Occupational Health & Safety Act, No 85 of 1993;
3.2.11 Promotion of Access to Information Act, No 2 of 2000;
3.2.12 Protection of Personal Information Act, No. 4 of 2013;
3.2.13 Skills Development Levies Act No. 9 of 1999;
3.2.14 Unemployment Insurance Contributions Act 4 of 2002;
3.2.15 Unemployment Insurance Act No. 30 of 1966;

3.2.16 Health Professions Act 56 of 1974

4 The information officer

4.1 The Information Officer [Section 51(1)(b)] 5.1. The Act prescribes the appointment of an Information Officer for public bodies where such Information Officer is responsible to, inter alia, assess request for access to information.

4.2 The head of a private body fulfils such a function in terms of section 51.

4.3 The Practice has appointed an Information Officer to assess such a request for access to information as well as to oversee its required functions in terms of the Act.

4.4 The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer oversees the functions and responsibilities as required for in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act 4 of 2013 after registering with the Information Regulator.

4.5 The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013.

4.6 This is in order to render the Practice as accessible as reasonable possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013.

4.7 All request for information in terms of this Act must be addressed to the Information Officer, see section 2 above.

5 Processing of personal information

The Practice takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy policy. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by the Practice.

5.1 **The purpose of processing information**

5.1.1 We process personal information for a variety of purposes, including but not limited to the following:

5.1.1.1 to provide or manage any information, products and/or services requested by data subjects.

5.1.1.2 to help us identify data subjects when they contact us.

5.1.1.3 to maintain client / customer records.
5.1.1.4 for recruitment purposes.
5.1.1.5 for employment purposes.
5.1.1.6 for general administration, financial and tax purposes.
5.1.1.7 for legal or contractual purposes.
5.1.1.8 for health and safety purposes.
5.1.1.9 to monitor access, secure and manage our premises and facilities.
5.1.1.10 to transact with our suppliers and business partners
5.1.1.11 to help us improve the quality of our products and services.
5.1.1.12 to help us detect and prevent fraud and money laundering.
5.1.1.13 to help us recover debts.
5.1.1.14 to carry out analysis and customer profiling; and
5.1.1.15 to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

5.2 **Categories of data subjects and personal information processed.**

PURPOSE / ACTIVITY	**TYPE OF DATA**	**LAWFUL BASIS FOR PROCESSING**
To engage with you after you have contacted us	Identity Contract Marketing & Communications	Express consent Performance of Contract with you Necessary to comply with legitimate interests
To provide you with our services as contracted	Identity Contact Financial Transactional Profile Usage	Express consent Performance of Contract with you Necessary to comply with legitimate interests Necessary to comply with legal obligation
To contract with you as a service provider	Identity Contact Financial Transactional	Express consent Performance of Contract with you Necessary to comply with legitimate interests Necessary to comply with legal obligation
To provide it to our authorised third-party service providers who need your personal data to provide their private services to you (such as credit bureau)	Identity Contact Financial Transactional	Express consent Performance of Contract with you Necessary to comply with legitimate interests
To manage payments, fees, and charges	Identity Contact Financial Transactional	Express consent Performance of Contract with you Necessary to comply with legitimate interests
To Manage our relationship with you which may include notifying you about changes to our terms or Privacy Policy or Services	Identity Contact Technical Usage	Express consent Performance of Contract with you Necessary to comply with legitimate interests Necessary to comply with legal obligation

To administer and protect our organisation	Identity Contact Technical Usage	Express consent Necessary to comply with legitimate interests Necessary to comply with legal obligation

5.3 **Recipients or categories of recipients with whom personal information is shared.**

5.3.1 We may share the personal information of our data subjects for any of the purposes outlined in Section 4.1, with: the following:

5.3.1.1 our carefully selected business partners who provide products and services under one of our brands; and
5.3.1.2 our service providers and agents who perform services on our behalf.

5.3.2 We do not share personal information of our data subjects with any third parties, except if:

5.3.2.1 we are obliged to provide such information for legal or regulatory purposes.
5.3.2.2 we are required to do so for purposes of existing or future legal proceedings,
5.3.2.3 we are selling one or more of our businesses to someone to whom we may transfer our rights under any customer agreement we have with you.
5.3.2.4 we are involved in the prevention of fraud, loss, bribery, or corruption.
5.3.2.5 they perform services and process personal information on our behalf.
5.3.2.6 this is required to provide or manage any information, products and/or services to data subjects; or
5.3.2.7 needed to help us improve the quality of our products and services.

5.3.3 We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them.

5.3.4 We will only disclose personal information to government authorities if we are required to do so by law.

5.3.5 Our employees and our suppliers are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

5.4 **Information security measures to protect personal information.**

5.4.1 Reasonable technical and organisational measures have been implemented for the protection of personal information processed by the Practice. In terms of the POPI Act, operators are third parties that process personal information on behalf of the Practice.

5.4.2 We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss, or destruction.

5.4.3 We will take steps to ensure that operators that process personal information on behalf of the Practice, apply adequate safeguards as outlined above.

5.5 **Trans-border flows of personal information**

5.5.1 We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.

5.5.2 We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of the POPI Act.

5.5.3 We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section 4.4.

5.6 **Personal information received from third parties.**

5.6.1 When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject, that they are aware of the contents of this PAIA manual and the Practice Privacy Policy, and do not have any objection to our processing their information in accordance with this policy.

6 Prescribed request forms and fees

6.1 **Form of request**

6.1.1 To facilitate the processing of your request, kindly:

6.1.1.1 Use the prescribed form.
6.1.1.2 Address your request to the Information Officer.
6.1.1.3 Provide sufficient detail to enable the Practice to identify:

6.1.1.3.1 The record(s) requested.
6.1.1.3.2 The requestor (and, if an agent is lodging the request, proof of capacity).
6.1.1.3.3 The email address of the requestor.
6.1.1.3.4 The form of access required.
6.1.1.3.5 The email address of the requestor.
6.1.1.3.6 If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
6.1.1.3.7 The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

6.2 **Prescribed fees**

6.2.1 The following applies to requests (other than personal requests):

6.2.1.1 A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.
6.2.1.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
6.2.1.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
6.2.1.4 Records may be withheld until the fees have been paid.

6.3 **Access to prescribed forms and fees.**

6.3.1 Prescribed forms and fees are available from reception.

7 Remedies

7.1 The Practice does not have internal appeal procedures regarding PAIA and POPI Act requests. As such, the decision made by the duly authorised persons in section 2, is final.

7.2 If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator, for relief.

The Information Regulator (South Africa)
SALU Building,
Hoofd Street, Forum III, 3rd Floor
Braampark
P.O. Box 31533

Tel No. +27 (0) 10 023 5207

Cell No. +27 (0) 82 746 4173
inforeg@justice.gov.za

8 PRIVACY POLICY

8.1 **Statement**

8.1.1 The Practice adheres to the highest standards of protecting your personal information when we process it by virtue of your use of our Services, or by providing us with your personal information in any other way.

8.1.2 As such, we have created this specific and detailed Privacy Policy for you to read and appreciate exactly how we safeguard your personal information and respect your privacy ("Policy").

8.1.3 Please note that the practice is duly registered and operating in accordance with the laws of South Africa (SA).

8.1.4 When processing your data, the Practice complies with the latest SA personal data privacy laws which fall under The Protection of Personal Information Act, known as POPIA or the POPI Act. In addition, as a global trader, the Practice recognises other regional data privacy requirements and legislation and directs its activities accordingly. An example of a non-SA, regional data privacy law is Europe's General Data Protection Regulation (GDPR) which is used in all member states to harmonize data privacy laws across Europe.

8.1.5 For more information regarding your personal information lawfully stored or used by the Practice, please contact reception.

8.1.6 Please ensure that you read all the provisions below, to understand all your, and our, rights and duties.

8.2 **Purpose of this Privacy Policy**

8.2.1 This Privacy Policy aims to give you information on how the Practice collects and processes your personal data through any form of your engagement with the Practice such as your engagement with us when contracting or corresponding with us, when using our Services, accessing, or providing us with your personal information in any other way.

8.2.2 This Privacy Policy complies with, and facilitates the obligations required from the South African Protection of Personal Information Act, No. 4 of 2013 ("POPI"), as amended.

8.2.3 Data subjects with citizenships from jurisdictions other than of South Africa, please note that the Practice complies with all South African data protection laws when

processing your personal information pursuant to the Services as we are a South African entity operating in the South African market.

8.2.4 It is important that you read this Privacy Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

8.3 **The data we collect about you:**

8.3.1 Personal data, or personal identifiable information, means any information about an individual, both natural and juristic entities, from which that entity can be identified. It does not include data where the identity has been removed (anonymous data).

8.3.2 We may collect, use, store, and transfer ("process") different kinds of personal data about you which we have grouped together as follows:

8.3.2.1 Identity Data including first name, maiden name, last name, country of residence, username or similar identifier, title, date of birth and gender, and/or for companies, the company's registration number, registered address and/or directors' information.
8.3.2.2 Contact Data including email address, physical/registered addresses, social media contact details and telephone numbers.
8.3.2.3 Financial Data including bank account details, third-party payment provider information and payment card details (which we do not store but only provide to our authorised third-party payment service provider under contract with us).
8.3.2.4 Social Media Data including all information accessible on your publicly available profile such as images, photos, photo tags, likes, followers, comments, posts, and stories.
8.3.2.5 Transaction Data including details about payments to and from you, contracts, contractual terms, contract fees, signups, subscriptions, invoices and other details of products and Services you have obtained from us or provide to us.
8.3.2.6 Marketing and Communications Data including your preferences in receiving notices and marketing from us and our third parties and your communication preferences.
8.3.2.7 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (for example, to provide you with services or allow you to provide us with your services). In this case, we may have to cancel Website-access or Services you have with us.

8.4 **How your personal data is collected:**

8.4.1 We use different methods to collect data from and about you, including direct interactions: You may give us your Identity, Contact, Profile, social media, Transaction and Financial Data by filling in various forms. This includes personal data you provide when you:

8.4.1.1 use our Services.
8.4.1.2 contract with us.
8.4.1.3 consult with us.
8.4.1.4 complete forms.
8.4.1.5 provide any services to us as a service provider or independent contractor on contract with us.
8.4.1.6 request information to be sent to you.
8.4.1.7 give us some feedback.

8.5 **How we use your personal data**

8.5.1 We will only use your personal data when the law allows us to and for legitimate reasons, which you hereby expressly understand and consent to. Most commonly, we will use your personal data in the following circumstances.

8.5.1.1 where we have your express consent to do so.
8.5.1.2 where we need to consult with you or perform on the Services contract we are about to enter or have entered into with you.
8.5.1.3 where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
8.5.1.4 where we need to comply with a legal or regulatory obligation.

8.6 **Purposes for which we will use your personal data:**

8.6.1 We have set out in a table format, (see Privacy Policy) a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate. Should you wish to discover to whom exactly we provide it to, please contact us and we shall provide you with same information.

8.6.2 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data, if not covered in the Policy document where more than one ground has been set out in the table below.

8.7 **Change of Purpose**

8.7.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

8.7.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

8.7.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8.8 **Disclosures of your personal data**

8.8.1 We may have to share your personal data with the parties set out below for the purposes set out in the table above.

8.8.1.1 Internal Third Parties as set out in the Glossary.
8.8.1.2 External Third Parties as set out in the Glossary.
8.8.1.3 Specific third parties listed in the table above; and/or
8.8.1.4 Third parties to whom we may choose to sell, transfer, or merge parts of our organisation or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our organisation, then the new owners may use your personal data in the same way as set out in this Privacy Policy.
8.8.1.5 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions and standards.

8.9 **International transfers**

8.9.1 We share your personal data within the practice of organisations and affiliates, and this may involve transferring and processing your data outside of South Africa.

8.9.2 Whenever we transfer your personal data out of either territory, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

8.9.2.1 We will always have a contract in place covering the processing of data and service-provision between the parties; and
8.9.2.2 We will only provide your personal data to an entity that processes personal information at standards equal to or better than ours; or
8.9.2.3 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the South African Information Regulator's office; or

8.9.2.4 Where we use certain service providers, we may use specific contracts/clauses approved by the South African Information Regulator's office which give personal data the same protection it has in South Africa.

8.9.3 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of South Africa.

8.10 **Data security**

8.10.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

8.10.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8.11 **Data retention**

8.11.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

8.11.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, any other South African applicable law requiring us to retain the data and whether we can achieve those purposes through other means, and the applicable legal requirements.

8.11.3 Details of retention periods for different aspects of your personal data are available from us by contacting us.

8.11.4 In some circumstances you can ask us to delete your data; see below for further information.

8.11.5 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8.12 **Your legal rights**

8.12.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data where we are the relevant "Responsible Party" over

such personal data. Please contact us to find out more about, or manifest, these rights:

8.12.1.1 request access to your personal data.
8.12.1.2 request correction of your personal data.
8.12.1.3 request erasure of your personal data.
8.12.1.4 object to the processing of your personal data.
8.12.1.5 request a restriction of processing your personal data.
8.12.1.6 request transfer of your personal data; and/or
8.12.1.7 right to withdraw consent.

8.12.2 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

8.12.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

8.12.4 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

8.13 **Glossary**

8.13.1 **Lawful Basis**

8.13.1.1 Legitimate Interest means the interest of our organisation in conducting and managing our organisation to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

8.13.1.2 Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering such a contract.

8.13.1.3 Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

8.13.1.4 Express consent means the confirmed express consent you have provided to our processing of your personal data by actively accepting this Privacy Policy.

8.13.2 **Third Parties**

8.13.2.1 Internal Third Parties means other entities or parties in the company group acting as joint controllers or processors and who are based in South Africa and provide IT and system administration services and undertake reporting.

8.13.2.2 External Third Parties means:

8.13.2.2.1 Authorised third-party service providers under contract with the company who need your personal information in order to contact and transact with you pursuant to your use of the Services.

8.13.2.2.2 specific third parties who the company makes use of.

8.13.2.2.3 service providers acting as processors based in South Africa and other various jurisdictions who provide IT and system administration services.

8.13.2.2.4 South African or other national governments and/or their respective authorities pursuant to our adherence with anti-corruption and crime-fighting legislation; and/or

8.13.2.2.5 professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services as required.

8.14 **Your legal rights**

8.14.1 You have the right to request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

8.14.2 Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

8.14.3 Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no valid reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be communicated to you, if applicable, at the time of your request.

8.14.4 Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

8.14.5 Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

8.14.5.1 if you want us to establish the data's accuracy.

8.14.5.2 where our use of the data is unlawful, but you do not want us to erase it.

8.14.5.3 where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

8.14.5.4 you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

8.14.5.5 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform on a contract with you.

8.14.5.6 Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Website access or Services to you. We will advise you if this is the case at the time you withdraw your consent. Please take note that regardless of your right to withdraw consent under the GDPR and POPI, other South African legislation applies and may require that we continue to process your data to comply with anti-corruption, crime-fighting and/or other national legislation, which you expressly understand and agree to.