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# Procedures for the Protection of Personal Information

## Annexure A

### 1. Introduction

Insight is a healthcare and wellness centre that provides assessment, therapeutic, and treatment services to clients and patients in the health sector.

### 2. Purpose of Data Collection

Insight collects personal information from clients and patients for the following purposes:

- Processing billing and medical aid claims
- Contacting clients/patients for appointment scheduling and administration
- Recording biographical details for assessment and treatment purposes
- Managing potential risks to self or others
- Providing treatment feedback
- Obtaining informed consent

### 3. Types of Personal Information Collected

Insight collects personal information as required for the purposes listed above. This may include, but is not limited to:

- Identification and contact details (for communication and record-keeping)
- Medical aid and billing information (for payment and claims processing)
- Biographical and health history (for assessment and treatment planning)
- Clinical notes and treatment progress (for effective therapeutic intervention)
- Emergency contact information (for safety and risk management)

- Signed consent forms (for legal and ethical compliance)

### 3. Personal Information Collected

Insight gathers the following categories of personal information for the purposes outlined in Section 2 above, with the specific purpose for each type of information noted alongside:

### 4. Personal Information Collected

Data Collected	Reason for Collection
Name and Surname	Identification for billing, claims submission, and communication purposes
Date of Birth and Age	Identification for billing, claims submission, and assessment/treatment planning
Residential Address	Billing and debt collection purposes
Cellphone Number	Communication and appointment scheduling
Occupation	Assessment and treatment planning
Employer	Billing, debt collection, and communication purposes
Medical Aid Provider, Plan, Number, Main Member, and Dependents (with corresponding Dates of Birth)	Billing and claims processing
Name of Relative or Friend	Emergency contact, communication, and risk management
Referring Doctor (if applicable)	Referral information and treatment coordination
Mother's Name and Contact Number (for minors)	Communication, consent, billing, claims, risk management, and feedback
Father's Name and Contact Number (for minors)	Communication, consent, billing, and claims processing

### 5. Method of Data Collection

All new clients and patients at Insight are provided with an intake form prior to, or at the time of, their first appointment. They are required to complete the form with the information outlined in Section 3 above. Clients and patients are also required to sign a consent form in accordance with HPCSA and POPIA regulations. The completed information is then securely captured on Insight's electronic booking and invoicing system.

## **6. Data Sharing**

Insight shares personal information only where necessary, and strictly for the purposes of service delivery and administration. Information may be shared with the following third parties:

1. Practice management and booking software service providers
2. Medical Aid providers (for billing and claims processing)
3. Debt collection agencies (only when necessary)
4. Other healthcare practitioners (for referral, treatment, or assessment purposes)

## **7. Measures to Protect Data**

### **Protection of Hardcopy Data**

1. Client and patient files are stored in a locked cabinet within Insight premises. Only authorised staff have access.
2. Once records reach the retention period specified by HPCSA guidelines, they are securely destroyed using a shredding process.

### **Protection of Electronic Data**

1. Personal information is captured on a licensed practice management system that includes built-in safeguards to ensure compliance with POPIA. Contractual agreements are in place with the service provider to protect client/patient information.
2. Access to the electronic system is password-protected. All practitioners using the system sign confidentiality undertakings to safeguard personal and shared client/patient information.
3. Personal information stored on Insight's computers or devices for administrative purposes (e.g., billing and reconciliation) is kept in password-protected files. All electronic devices are themselves password-secured.
4. PDF reports sent via email are password-protected to ensure that only authorised recipients can access them.
5. Electronic data is permanently deleted once client/patient files reach termination periods set out by HPCSA guidelines.

### **Protection by Third Parties**

Third-party service providers with access to personal information are required to sign confidentiality agreements to safeguard client/patient data. Medical Aids are assumed to maintain their own POPIA compliance in line with the Act.

### **De-identification of Information**

Any information shared with other practitioners for supervision, training, or research purposes is fully de-identified to protect the privacy of clients and patients.

## **8. Information Officer**

Insight has appointed an Information Officer, who is registered in accordance with POPIA requirements. The Information Officer is responsible for implementing and overseeing all measures outlined in this policy.

## **9. Breach Procedures**

In the event of a data breach:

1. The affected individual(s) will be notified as soon as reasonably possible.
2. The Information Regulator will be informed of the breach in line with POPIA requirements.

## **10. Consent Forms**

All new clients are required to sign a consent form that includes POPIA compliance clauses and acknowledges the inherent risks of data handling. Existing clients are issued updated consent forms when applicable. Consent forms are securely stored in password-protected electronic files within client records.

## **11. POPIA Documentation**

All POPIA-related documentation, including this policy, is stored electronically in a secure, password-protected format. Clients/patients or relevant Officers may request access to Insight's POPIA policies, which will be provided promptly upon request.