



PROTECTION OF PERSONAL INFORMATION ACT

1 July 2021

Dear Comparemed user,

As you are well aware, the long awaited implementation of the POPIA will come into effect from the 1st July 2021.

It is required that all companies comply with this new law implementation and it is therefor that I would like to make the below available to you as required and for your reference and record.

In respect of Sections 20 and 21 of the Act, Comparemed (Pty) Ltd confirm that **personal information processed** by Comparemed (Pty) Ltd or any person under our authority adheres to the following:

Personal information stored on our systems on behalf of User/s will be done with the knowledge or authorisation of the User/s, known as the “Responsible Party/Parties”.

Personal information that comes to our knowledge will be treated as confidential and we will not disclose this information to any party unless required by law or in the course of proper performance of our duties.

Comparemed (Pty) Ltd is deemed a “third party” and “operator” in terms of the POPI Act (the Act.) since we process personal information for a “**Responsible Party**”, namely User/s, in terms of a contract or mandate, without coming under the direct authority of that Party. Comparemed (Pty) Ltd is therefore included in the data privacy management processes.

In terms of Section 19, “**Security measures on integrity and confidentiality of personal information**”, we take all reasonable technical and organisation measures to prevent the following:

Loss of, damage to or unauthorised destruction of personal information, and

unlawful access to or processing of personal information.

We will notify you **immediately** where there are reasonable grounds to believe that the personal information of a data subject has been **accessed or acquired** by any unauthorised person.

Section 21(1) refers to the “Responsible Party”, namely User/s, that must in terms of a written contract ensure that the “Operator” establishes and maintains security measures. We understand from the aforementioned that the onus is on the “**Responsibility Party**” to **Contract** with Comparemed (Pty) Ltd in terms of security measures. However, we wish to confirm the following provisions in terms of data security.

All user data is secured by user specific access rights as well as passwords. PDF documents containing personal information are encrypted with a password. All confidential client information is stored securely on a server hosted by Xneelo in a data centre in Johannesburg, South Africa. The solution is backed up daily to an offsite location.



We acknowledge that section 21 requires that “Responsible Parties” **conduct due diligence** to ascertain that we are compliant with the Act. We understand that the following is included in the due diligence process.

Ensure that section 20 and 21 requirements are included in our contract.

Ensure that all types of Personal Information that is shared with us are identified and recorded and confirm this in writing;

Confirm and consider the mechanisms through which Personal Information is shared with and processed by Comparemed (Pty) Ltd;

Any contract breach by Comparemed (Pty) Ltd can result in immediate termination and damages suffered can be claimed.

We are pleased to confirm that:

Comparemed (Pty) Ltd has not had any information security breaches or incidents pertaining to non-compliance.

*We are ISO 27001 and 27002 certified – **NO**.*

*We are aware of and comply with the requirements of ISO 27701 – **YES**.*

We have the following data protection mechanisms in place. All software is secured behind a hardware firewall provided by Xneelo with DDOS protection as well as a software firewall on the physical server housing Comparemed (Pty) Ltd. The server does not use unsecure protocols like FTP to provide additional levels of security.

Kind Regards

Comparemed Team