PRIVACY POLICY

UMSEBE HEALTHCARE CC

(Registration No: CK2009/091861/23)

Effective Date: 01 April 2026
Version: 2.0
Prepared in accordance with the Protection of Personal Information Act, No. 4 of 2013 (POPIA)

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1. INTRODUCTION

Umsebe Healthcare CC ("**Umsebe**", "we", "us", "our") is committed to protecting the privacy, confidentiality, integrity, and security of Personal Information (as defined in POPIA) processed in the course of conducting our business.

This Privacy Policy explains how we collect, use, process, store, disclose, and protect Personal Information in compliance with:

- The Protection of Personal Information Act, No. 4 of 2013 (**"POPIA"**)
- The Promotion of Access to Information Act, No. 2 of 2000 (**"PAIA"**)
- Medicines and Related Substances Act, No. 101 of 1965
- South African Health Products Regulatory Authority (**"SAHPRA"**) requirements
- South African Pharmacy Council (**"SAPC"**) requirements
- National Department of Health (**"NDoH"**) requirements
- Good Distribution Practice ("**GDP"**) and Good Wholesaling Practice ("**GWP"**) standards
- Other applicable South African and international regulatory requirements

This policy applies to all Personal Information processed by Umsebe relating to customers, suppliers, healthcare professionals, employees, contractors, service providers, regulatory authorities, and patient-related information where applicable.

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2. WHO WE ARE

Our full registered name is:

Umsebe Healthcare CC
(Registration Number: 2009/091861/23)

We are an importer, exporter, and distributor of pharmaceutical products and Medical Devices in South Africa and Southern Africa. We supply pharmaceutical products and Medical Devices through licensed channels including:

- Wholesalers
- Pharmacies
- Hospitals
- Healthcare Practitioners
- Healthcare Institutions
- Government and private healthcare providers

We do not ordinarily provide direct clinical treatment to patients and do not generally operate as a patient-facing healthcare provider.

We are licensed and regulated by:

- South African Health Products Regulatory Authority (SAHPRA)
- National Department of Health (NDoH)
- South African Pharmacy Council (SAPC)

Registered Address:

506 Sunclare Building
21 Dreyer Street
Claremont
Cape Town
7708
South Africa
Telephone: (021) 202 5742
Email: info@umsebe.com

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3. INFORMATION OFFICER

In accordance with POPIA, Umsebe has appointed an Information Officer responsible for ensuring compliance with data protection legislation.

Information Officer:
Ms Dineshree Naiker
Email: dineshree@umsebe.com
Telephone: (021) 202 5742

Requests relating to Personal Information, corrections, objections, complaints, or access requests may be directed to the Information Officer.

If a complaint is not satisfactorily resolved, the matter may be referred to the Information Regulator of South Africa.

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4. PERSONAL INFORMATION WE COLLECT

The Personal Information we collect depends on the nature of our relationship with you and may include the following:

4.1 Customers, Clients and Healthcare Professionals

- Full names
- Company name
- Practice details

- Professional registration numbers
- Pharmacy and facility details
- Billing and delivery addresses
- Contact details
- Email addresses
- Telephone numbers
- Banking details
- Purchase and order history
- Licensing and compliance documentation
- Credit application information
- Customer Verification, Compliance screening and due diligence documentation

4.2 Suppliers, Principals and Service Providers

- Company registration documents
- Tax information
- VAT details
- Banking details
- Contracts and agreements
- Contact details of authorised representatives
- Compliance and licensing documentation

4.3 Employees and Contractors

- Identification information
- Employment records
- Payroll and remuneration records
- Banking details

- Tax and statutory information
- Performance and disciplinary records
- Emergency contact details

4.4 Patient Information (Only Where Applicable)

In limited circumstances, Umsebe Healthcare may process special personal information relating to patients for the purposes of:

- Pharmacovigilance reporting
- Adverse event reporting
- Product quality complaints
- Product recalls
- Named-patient importation programmes
- Compassionate use programmes
- Regulatory reporting obligations

Such information will only be processed where lawful and necessary for the specified purpose(s), and permitted or required by applicable legislation, regulatory requirements, or public health obligations.

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5. PURPOSE OF PROCESSING

We process Personal Information only for lawful and legitimate business purposes, including:

- Supply and distribution of pharmaceutical products
- Import and export compliance
- Product registration and regulatory submissions
- Pharmacovigilance and adverse event reporting
- Product quality investigations and recalls
- Managed care access (assistance with re-imbursements)

- Customer account management
- Credit control and debt collection
- Contract administration
- Employee administration and payroll
- Supplier onboarding and management
- Regulatory inspections and audits
- Legal compliance and risk management
- Internal reporting and governance
- Fraud prevention and security
- IT systems management and business continuity
- Marketing and communications where lawful and consented to where required

to the extent necessary to fulfil those purposes.

We do not sell Personal Information to third parties.

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6. LAWFUL BASIS FOR PROCESSING

We process Personal Information on one or more of the following lawful grounds:

- On consent from the data subject
- In the performance of a contract
- To comply with legal and regulatory obligations
- To protect a legitimate interest of the data subject
- The pursuit of Umsebe's legitimate business interests
- To comply with public law duties and industry regulations

Where special personal information is processed, this is done strictly in accordance with POPIA and applicable healthcare legislation.

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7. HOW WE COLLECT INFORMATION

We may collect Personal Information:

7.1 Directly from You

When you:

- Contact us by telephone, email, website, WhatsApp, or messaging platforms
- Enter into agreements with us
- Submit credit applications
- Provide compliance documentation
- Attend meetings, conferences, or events
- Apply for employment
- Register complaints or adverse event reports
- Request assistance with funder re-imbursement

7.2 Indirectly from Third Parties

Including:

- Healthcare institutions
- Pharmacies and hospitals
- Healthcare professionals
- Regulatory authorities
- Service providers
- Credit bureaus
- Publicly available regulatory databases
- International principals and manufacturers

8. SHARING OF PERSONAL INFORMATION

We may share Personal Information where necessary with:

- Third-party logistics providers (3PL)
- Warehousing and distribution partners
- SAHPRA
- NDoH
- SAPC
- Regulatory authorities
- Wholesalers and pharmacies
- Hospitals and healthcare institutions
- Healthcare Funders
- External legal advisors
- Auditors and consultants
- Financial institutions and insurers
- SARS and statutory bodies
- IT service providers and cloud platforms
- International principals and manufacturers
- Other authorised Operators as defined in POPIA

All Operators process information only under written instruction and are required to maintain appropriate security safeguards.

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9. CROSS-BORDER TRANSFERS

Due to the nature of pharmaceutical importation and exportation, Personal Information may be transferred by Umsebe outside of South Africa to:

- International pharmaceutical principals

- Overseas manufacturers
- Foreign regulators
- International logistics providers
- Global pharmacovigilance reporting systems

Where cross-border transfers occur, Umsebe shall ensure that transfer of personal information shall only be done if :-

- the processing with the third-party recipient is subject to a law or agreement that provides an adequate level of protection, and such processing complies with the conditions for reasonable processing; and/or
- The processing will comply with conditions that are the same or similar to the criteria measurement of POPIA.

Umsebe shall obtain confirmation from the recipient or designated Operator that it has the necessary and appropriate technical, security and organisational measures in place in accordance with best industry practice to process all Personal Information and to protect it against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, and which in addition, provides a level of security appropriate to the risk represented by the processing and the nature of the Personal Information to be protected and which safeguards comply with the requirements set out under POPIA.

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10. DATA RETENTION

We retain Personal Information only for as long as necessary to:

- fulfil the purpose for which it was collected

- comply with legal obligations
- meet regulatory retention requirements
- defend or enforce legal rights

Retention periods may be determined by:

- SAHPRA, DOH and/or SAPC requirements
- Medicines legislation
- Tax legislation
- Labour legislation
- Companies Act requirements
- Financial reporting obligations
- Audit and compliance standards

Once retention is no longer required, records are securely destroyed or de-identified.

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11. SECURITY OF PERSONAL INFORMATION

We implement appropriate technical, organisational, and administrative safeguards to protect Personal Information against:

- unauthorised access
- loss
- misuse
- alteration
- unlawful disclosure
- destruction

These measures include:

- restricted access controls
- password protection
- secure servers and systems
- confidentiality agreements
- operator agreements
- audit trails
- staff training
- regular compliance monitoring
- incident management procedures

NB: While we take all reasonable precautions, no transmission over the internet is completely secure and users share information at their own risk.

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12. COOKIES AND WEBSITE DATA

Our website may use cookies and similar technologies to improve user experience, website functionality, analytics, and lawful marketing communications.

Cookies may assist with:

- website performance
- visitor analytics
- system security
- understanding user engagement
- improving website functionality

Users may manage cookie preferences through browser settings.

Please refer to our separate Cookie Policy for further information.

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13. YOUR RIGHTS UNDER POPIA

You have the right to:

- request access to your Personal Information
- request correction of inaccurate information
- request deletion where legally permissible
- object to certain processing activities
- withdraw consent where processing is based on consent
- lodge a complaint with the Information Regulator

Certain requests may be subject to legal and regulatory retention obligations.

Requests should be submitted in writing to the Information Officer.

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14. PAIA MANUAL

Our PAIA Manual is available upon request and sets out the process for requesting access to records held by Umsebe.

Requests for access to records must be submitted in accordance with PAIA requirements.

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15. POLICY UPDATES

We may update this Privacy Policy from time to time to reflect changes in law, regulation, business operations, or compliance requirements.

The latest version will be made available upon request and on our official platforms where applicable.

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16. CONTACT DETAILS

For any privacy-related queries, requests, or complaints, please contact:

Information Officer
Umsebe Healthcare CC
Telephone: (021) 202 5742
Email: info@umsebe.com

If unresolved, complaints may be referred to:

The Information Regulator (South Africa)

Website: www.justice.gov.za/inforeg
Email: complaints.IR@justice.gov.za
