



HEADROOM PRIVACY POLICY

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1. Purpose

Headroom is the trade name of www.headroom.co.za, an online market place owned, developed and operated by Danubia HI (Pty) Ltd (Reg. no. 2017/078392/07), incorporated in the Republic of South Africa, with its registered office at 6 Lemon Lane, Newlands, Cape Town, 7725, South Africa.

This Privacy Policy stipulates how Danubia HI (Pty) Ltd (“Headroom”) treats personal information collected electronically when you are on Headroom’s online platform. Headroom respects your privacy and your personal information and for this reason, Headroom takes all reasonable measures, in accordance with this Policy, to protect your personal information and to keep it confidential.

Headroom is committed to protecting the integrity, confidentiality and privacy of the personal information you submit. Online registration automatically collects website usage of information from you when you register.

This document contains a number of legal obligations, which you are presumed to be familiar with. As such, we encourage you to read this document thoroughly and direct any queries to our user services at admin@headroom.co.za or tel. no. +27 87 195 1126. We regret that if there are any points below that you do not accept, your only recourse is not to use our website.

Except as set out below, we do not share, or sell, or disclose to a third party, any personally identifiable information collected at this site.

2. Definitions

“Headroom” means any website of ours and includes all web pages controlled by us.

“User” means any person who uses or visits the website for any purpose.

3. Collection of Data

In the normal course of business activities, Headroom will collect personal information, including sensitive information. This information is used:

- to provide you with the services which you request;



- to verify your identity for security purposes;
- to market our services and products.

Information which does not identify any individual may be used in a general way by us or third parties, to provide class information, for example relating to demographics or usage of a particular page or service.

We keep information which forms part of our business record for a minimum of six years, as we may need it to support a claim or defence in court. That is also required to comply with the tax laws.

Personal information may include a practitioner name, residential and or business address, date of birth, contact details, occupation, and professional memberships. Sensitive information may include details of an individual's racial or ethnic origin, religious beliefs, and health information.

4. Security of Personal Information

Headroom takes reasonable steps to ensure the security of personal information that it holds, regardless of the form in which that information is held. This will include taking reasonable steps to prevent the misuse or loss of this information, or unauthorised disclosure, access to, or modification of this information.

Where the information is held in electronic form, access will be controlled by user logins and passwords, and restriction of access only to persons who need to have that access in the course of the company's business activities.

5. Your domain name and e-mail address

This information is recognised by our servers and the pages that you visit are recorded. We shall not under any circumstances, divulge your e-mail address to any person who is not an employee or contractor of ours and who does not need to know, either generally or specifically.

This information is used:

- to correspond with you or deal with you as you expect;
- in a collective way not referable to any particular individual, for the purpose of quality control and improvement of our site;
- to send you news about the services to which you have signed up;
- to tell you about other of our services or services of sister web sites.



6. Information you post on our website

Information you send to us by posting to a forum or blog or in your advertisement, is stored on our servers. We do not specifically use that information except to allow it to be read, but you will see in our s that we reserve a right to use it in any way we decide. Our use will not contravene the guidelines of the Health Professions Council of South Africa.

7. Cookies

When you visit Headroom’s Online registration platform, the web server temporarily records the following information for system security purposes: the domain name or IP address of the computer or device requesting access and the access date. We may save some information in the form of cookies on your PC. A cookie is a piece of information that a website can send to your browser and save on your system. Cookies do not give us access to your system or your personal data.

Please note that standard browser settings allow the use of cookies. If you do not want to allow the use of cookies, you can disable this option in your browser. Cookies are exclusively used to tailor our website to your preferences.

8. Use and transfer of Personal Data

Headroom uses the collected data for administration and aggregation purposes and solely for that purpose. Headroom ensures safekeeping of data and will only disclose data to official agencies if required by law. Headroom employees are required to keep strict confidentiality of collected data.

9. Third Party

Headroom may commission other service providers who will be bound by our privacy policies as far as they may be required to have access to our customers' personal information to perform their services.

Our website (www.Headroom.co.za) may contain links to or from other sites. While we try to link only to sites that share our high standards and respect for privacy, Headroom is not responsible for the content or the security or privacy practices employed by other sites.

We recommend that you always read the privacy and security statements on such sites.

10. Financial information relating to your credit cards



This information is never taken by us either through our website or otherwise. At the point of payment, you are transferred to a secure page on the website of PayGate (Pty) Ltd or some other reputable payment service provider. That page is not controlled by us and our staff and contractors do not have access to it.

11. Note on padlock symbols and other trust marks

12. Financial information relating to your credit cards

We may keep your financial information to provide you with a better user experience next time you visit us and to prevent fraud.

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser, and to encrypt any data you give us when you buy, including financial information such as credit or debit card numbers. Our SSL certificate encryption level is 128-bit/256-bit. Whenever we ask for financial information, you can check that SSL is being used by looking for a closed padlock symbol or other trust mark in your browser URL bar or toolbar.

We take the following measures to protect your financial information:

- We keep your financial information encrypted on our servers.
- We do not keep all your data, so as to prevent the possibility of our duplicating a transaction without a new instruction from you.
- Access to your information is restricted to authorised staff only.
- We automatically delete your information when the card expires.
- If we ask you questions about your financial information, we shall show partial detail [the first four OR the last four digits of the debit or credit card number], only enough to identify the card(s) to which we refer.

13. Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to Users or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

14. Sending a message to our support system



When you send a message, we collect the data you have given to us in that message in order to obtain confirmation that you are entitled to receive the information and to provide to you the information you need. We record your request and our reply in order to increase the efficiency of our business / organisation. We do not keep any personally identifiable information associated with your message.

15. Complaints

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and, if we do, what that information is. We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

To file a complaint, you can contact us on admin@Headroom.co.za.

16. Use of site by children

We do not market to children, nor do we sell products or services for purchase by children. We do sell products and services for end use by children, but for purchase by adults. If you are under 18, you may use our site only with the consent of your parent or guardian.

17. Compliance with the law

This confidentiality policy has been compiled so as to comply with the law of every jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your country, we would like to hear from you, but ultimately it is your choice as to whether you wish to use our website.

18. Review or update personally identifiable information

At any time, you may review or update the personally identifiable information that we hold about you, by accessing your account or contacting us at admin@headroom.co.za. To better safeguard your information, we will take reasonable steps to verify your identity before granting access or making corrections to your information.



19. Removal of your information

If you wish us to remove personally identifiable information from our web site, you may contact us at admin@headroom.co.za. To better safeguard your information, we will take reasonable steps to verify your identity before removing your information.

20. Data may be “processed” outside South Africa

Our web sites are hosted in South Africa. We also use outsourced services in countries outside South Africa from time to time in other aspects of our business. Accordingly, data obtained within South Africa may be “processed” outside South Africa and data obtained in any other country may be processed within or outside that country.

21. Amendments of Information

The Headroom owner, Danubia HI (Pty) Ltd reserves the right to amend this Privacy Policy at any time.

This Privacy Policy forms part of the Terms and Conditions of use of this web site. If you do not agree with this Privacy Policy, then you may not use Headroom.

While the Headroom owner will attempt to flag changes to this Privacy Policy as and when implemented, Headroom users always remain responsible for ensuring that they are aware of the current terms of this Privacy Policy whenever accessing Headroom.

22. Policy information

Original Issued: 2020_05_04

Frequency of Review: Annually

Responsible Officer: Chief Financial Officer

Headroom Privacy Policy Version 2_2020_09_22

23. Contacts

Please direct any questions, suggestions or specific requests to email: admin@headroom.co.za.

Physical Address: Danubia HI (Pty) Ltd, 6 Lemon Lane, Newlands, Cape Town, 7725.

Telephone: (+27) 87 195 1126

