



## WEBSITE PRIVACY POLICIES

### This document contains:

- 1) Website Policy ([www.dramiric.co.za](http://www.dramiric.co.za))
- 2) Cookie Policy
- 3) Children's Privacy Policy

### 1. DEFINITIONS

- 1.1. **Anonymous Information** - information that does not directly or indirectly identify and cannot reasonably be used to identify an individual user.
- 1.2. **Application** - a program or service operated by the practice that may be displayed on various online, mobile, or other platforms and environments, including those operated by third parties, which permits us to interact directly with our users.
- 1.3. **Children** - refers to individuals under 18 years of age.
- 1.4. **Data Controller** - is the subsidiary or affiliated entity of Dr Antoinette Miric that is responsible for the personal information collected.
- 1.5. **Data Processor** - is a person or entity that processes personal information on behalf of a data controller (or data controllers) and is permitted to perform data processing only as directed by the data controller(s).
- 1.6. **IP Address** - is associated with the access point through which you enter the Internet and is typically controlled by your Internet Service Provider (ISP) or your company. We may use IP addresses to collect information regarding the frequency with which users visit various parts of our sites and applications, and we may combine IP addresses with personal information.
- 1.7. **Parents** - means a parent or legal guardian.
- 1.8. **Personal Information** - means information that identifies (whether directly or indirectly) a particular individual, such as the individual's name, postal address, email address, and telephone

number. When anonymous information is directly or indirectly associated with personal information, the resulting information is also treated as personal information.

- 1.9. **Public Forums** - Our sites and applications may offer message boards, conversation pages, blogs, chat rooms, social community environments, profile pages, and other forums that do not have a restricted audience. If you provide personal information when you use any of these platforms, that personal information may be publicly posted and otherwise disclosed without limitation as to its use by us or by a third party.

## 2. INTRODUCTION

*Dr Antoinette Miric* is committed to safeguarding the privacy of our website visitors and service users.

This policy applies where we are acting as a data controller with respect to your personal data.

We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and/or services, we will ask you to consent to our use of cookies when you first visit our website.

In this policy, "we"; "us" and "our" refer to Dr Antoinette Miric.

## 3. SCOPE OF THIS POLICY

This privacy policy describes the treatment of information provided or collected on the sites and applications where this privacy policy is posted whether on our digital properties or on applications, we make available on third-party sites or platforms. We follow this privacy policy in accordance with applicable law in the places where we operate. In some cases, we may provide additional data privacy notices specific to certain products, practices, or regions. **Those terms are to be read in conjunction with this policy.**

Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our applications), the information you provide may be separately collected by the third-party.

The information we collect is covered by this /her privacy policy, and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices. **Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications.**

**Please also keep in mind that our sites and applications may contain links to other sites not owned or controlled by us and we are not responsible for the privacy practices of those sites.**

We encourage you to be aware when you leave our sites or applications and to read the **privacy policies** of other sites that may collect your personal information.

#### **4. TYPES OF INFORMATION WE COLLECT**

We collect two basic types of information – **personal information and anonymous information** – and we may use personal and anonymous information to create a third type of information, **aggregate information**. For example, we collect:

- **registration information** - information you provide us with when you create an account;
- information you provide in **public forums** on our sites and applications, such as your public posts;
- information sent either one-to-one or within a limited group using our **message, chat, post, or similar functionalities**, where we are permitted by the applicable law to collect this information;
- information we obtain from a **third party**, such as a site or platform provider, about the use of our applications on third-party platforms or devices;
- **location information** - information provided by a mobile device or other device interacting with one of our sites or applications (including through beacon technologies), or associated with your IP address, where we are permitted by law to process this information;
- **activity information** about your use, and the use by any person(s) you authorise through your account, of our sites and applications, such as the content you view or post, how often you use our services, and your preferences; and
- **use, view** device data when you visit our sites, use our applications on third-party sites or platforms, or open emails we send, including your browser or unique device identifier, and IP addresses.

#### **5. HOW WE COLLECT YOUR INFORMATION**

We collect information you provide to us when you request a services, or information from us, register with us (including when you link your profile on a third-party site or platform with your registration account), participate in public forums or other activities on our sites and applications, respond to guest surveys, or otherwise interact with us using one or more devices.

We collect information through a variety of technologies, such as cookies, analytics tools, Flash, pixels, and Web beacons.

**You consent to us acquiring information from other trusted sources to update or supplement the information you provided, or we collected automatically, such as when we validate postal address information.** Applicable laws may require that you authorise the third party to share your information with us before we can acquire it.

## **6. USE OF YOUR INFORMATION BY Dr Antoinette Miric**

- We may process data about your use of our website and services (**usage data**). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your service use. This usage data may be processed for the purposes of analysing the use of the website and services.
- We may process **account data**, which may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases, and communicating with you.
- We may process your personal data that is provided during the use of our services (**service data**). The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases, and communicating with you.
- We may process information contained in any enquiry you submit to us regarding goods and/or services (**enquiry data**). The enquiry data may be processed for the purposes of offering, marketing, and selling relevant goods and/or services to you.
- We may process information relating to transactions, including purchases of goods and services, that you enter with us and/or through our website (**transaction data**). The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions.
- We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (**notification data**). The notification data may be processed for the

purposes of sending you the relevant notifications and/or newsletters. You will always have the option of withdrawing consent to this service.

- We may process information contained in or relating to any communication that you send to us (**correspondence data**).

**Please do not supply any additional or irrelevant personal data to us unless we prompt you to do so.**

## **7. SHARING YOUR INFORMATION WITH OTHER ENTITIES**

We will not share your personal information with a third party outside the 'Dr Antoinette Miric practice' except in limited circumstances, including:

When you allow (explicit consent) us to sharing your personal information with another company, such as:

- Electing to share your personal information with carefully selected companies so that they can send you offers and promotions about their products and services; and
- Directing us to share your personal information with third-party sites or platforms, such as social networking sites. **Please note that once we share your personal information with another company, the information received by the other company is controlled by that company and becomes subject to the other company's privacy practices.**
- When companies perform services on our behalf, like package delivery, marketing and advertising, and customer service; however, these companies are prohibited from using your personal information for purposes other than those requested by us or required by law; and
- When we share your personal information with third parties in connection with the sale of a business, to enforce our **Terms and Conditions**, to ensure the safety and security of our guests and third parties, to protect our rights and property and the rights and property of our guests and third parties, to comply with legal process, or in other cases if we believe in good faith that disclosure is required by law.

## **8. CHILDREN'S PRIVACY**

For information about our practices regarding children's personal information, please read our **Children's Privacy Policy**.

## **9. DATA SECURITY, INTEGRITY, AND RETENTION**

The security, integrity, and confidentiality of your information are extremely important to us. We have implemented technical, administrative, and physical security measures that are designed to protect your personal and sensitive information from unauthorised access, disclosure, use, and modification. We regularly review our security procedures to consider appropriate new laws, technology, and methods. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable.

**You consent to us retaining all your personal information for a period of six years after:**

- (a) termination of your membership;
- (b) your last electronic or telephonic communication with us;
- (c) your last electronic or telephonic transaction with us.

## **10. YOUR RIGHTS**

In this section, we summarise the rights that you have under data protection law. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under the data protection law are:

- (a) the right to access;
- (b) the right to object to processing - you have objected to processing, pending the verification of that your information. Where processing has been restricted on this basis, Dr Antoinette Miric may continue to store your personal data. However, Dr Antoinette Miric will only otherwise process it: with your consent; for the establishment, exercise, or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- (c) the right to data portability;
- (d) the right to complain to the Regulator;
- (e) the right to withdraw consent;
- (f) you have the right to have any inaccurate personal data about you rectified;

- (g) you have the right to restrict the processing of your personal data when: you contest the accuracy of the personal data or processing is unlawful;
- (h) You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us, or the purposes of the legitimate interests pursued by us or by a third part. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Dr Antoinette Miric's Information Officer who is responsible for data protection.

To the extent that the legal basis for our processing of your personal information is consent, **you have the right to withdraw your consent at any time.** Withdrawal will not affect the lawfulness of processing before the withdrawal.

## **11. CHANGES TO THIS PRIVACY POLICY**

From time to time, we may change this privacy policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. **It is your obligation to check on a regular basis whether the policy has changed.**

## **12. OUR DETAILS**

10.1 This website is owned and operated by *Dr Antoinette Miric*.

10.2 We are registered as a Sole Proprietor and our registered office is at *75 Oxford Rd, Saxonwold, 2196*.

10.3 Our principal place of business is at *75 Oxford Rd, Saxonwold, 2196*.

10.4 You can contact us: by post, to *75 Oxford Rd, Saxonwold, 2196*, or 010 350 0351.

## **INFORMATION OFFICER DETAILS**

Name: Antoinette Miric

Telephone Number: 010 350 0351

E-Mail Address: [doctor@dramiric.co.za](mailto:doctor@dramiric.co.za)

Last revised: 19 June 2021

# COOKIE POLICY

Last updated [2021-06-02]

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## INTRODUCTION

Dr Antoinette Miric (“we” or “us” or “our”) may use cookies, web beacons, tracking pixels, and other tracking technologies when you visit our website [Name of Website.com], including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”) to help customize the Site and improve your experience.

We reserve the right to make changes to this Cookie Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Cookie Policy. Any changes or modifications will be effective immediately upon posting the updated Cookie Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Cookie Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Cookie Policy by your continued use of the Site after the date such revised Cookie Policy is posted.

## USE OF COOKIES

A “cookie” is a string of information which assigns you a unique identifier that we store on your computer. Your browser then provides that unique identifier to use each time you submit a query to the Site. We use cookies on the Site to, among other things, keep track of services you have used, record registration information, record your user preferences, keep you logged into the Site, facilitate purchase procedures, and track the pages you visit. Cookies help us understand how the Site is being used and improve your user experience.

## TYPES OF COOKIES

The following types of cookies may be used when you visit the Site:

### Advertising Cookies

Advertising cookies are placed on your computer by advertisers and ad servers to display advertisements that are most likely to be of interest to you. These cookies allow advertisers and ad servers to gather information about your visits to the Site and other websites,

alternate the ads sent to a specific computer, and track how often an ad has been viewed and by whom. These cookies are linked to a computer and do not gather any personal information about you.

### **Analytics Cookies**

Analytics cookies monitor how users reached the Site, and how they interact with and move around once on the Site. These cookies let us know what features on the Site are working the best and what features on the Site can be improved.

### **Our Cookies**

Our cookies are “first-party cookies” and can be either permanent or temporary. These are necessary cookies, without which the Site won't work properly or be able to provide certain features and functionalities. Some of these may be manually disabled in your browser but may affect the functionality of the Site.

### **Personalisation Cookies**

Personalization cookies are used to recognize repeat visitors to the Site. We use these cookies to record your browsing history, the pages you have visited, and your settings and preferences each time you visit the Site.

### **Security Cookies**

Security cookies help identify and prevent security risks. We use these cookies to authenticate users and protect user data from unauthorized parties.

### **Site Management Cookies**

Site management cookies are used to maintain your identity or session on the Site so that you are not logged off unexpectedly, and any information you enter is retained from page to page. These cookies cannot be turned off individually, but you can disable all cookies in your browser.

### **Third-Party Cookies**

Third-party cookies may be placed on your computer when you visit the Site by companies that run certain services we offer. These cookies allow the third parties to gather and track certain information about you. These cookies can be manually disabled in your browser.

## **CONTROL OF COOKIES**

Most browsers are set to accept cookies by default. However, you can remove or reject cookies in your browser's settings. Please be aware that such action could affect the availability and functionality of the Site.

For more information on how to control cookies, check your browser or device's settings for how you can control or reject cookies, or visit the following links:

[Apple Safari](#)

[Google Chrome](#)

[Microsoft Edge](#)

[Microsoft Internet Explorer](#)

[Mozilla Firefox](#)

[Opera](#)

[Android \(Chrome\)](#)

[Blackberry](#)

[Iphone or Ipad \(Chrome\)](#)

[Iphone or Ipad \(Safari\)](#)

In addition, you may opt-out of some third-party cookies through the [Network Advertising Initiative's Opt-Out Tool](#).

## OTHER TRACKING TECHNOLOGIES

In addition to cookies, we may use web beacons, pixel tags, and other tracking technologies on the Site to help customize the Site and improve your experience. A "web beacon" or "pixel tag" is tiny object or image embedded in a web page or email. They are used to track the number of users who have visited pages and viewed emails and acquire other statistical data. They collect only a limited set of data, such as a cookie number, time and date of page or email view, and a description of the page or email on which they reside. Web beacons and pixel tags cannot be declined. However, you can limit their use by controlling the cookies that interact with them.

## PRIVACY POLICY

For more information about how we use information collected by cookies and other tracking technologies, please refer to our Privacy Policy posted on the Site. This Cookie Policy is part of and is incorporated into our Privacy Policy. By using the Site, you agree to be bound by this Cookie Policy and our Privacy Policy.

## CONTACT US

If you have questions or comments about this Cookie Policy, please contact us at:

DR ANTOINETTE MIRIC | PSYCHIATRIST

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MMED PSYCH (WITS) FCPSYCH (SA)

PR No. 0220000559032

MP 0552038

# CHILDREN'S PRIVACY POLICY

*Dr Antoinette Miric* is committed to protecting the privacy of children who use our sites and applications. This Policy explains our information collection, disclosure, and parental consent practices with respect to the information provided by children under the age of 18 ("child" and defined in our general Privacy Policy).

## 1. THE INFORMATION WE COLLECT FROM CHILDREN, HOW WE USE IT AND WHEN WE COMMUNICATE WITH PARENTS

- *Dr Antoinette Miric* offers its patients a range of sites and applications, some of which are primarily targeted at children, and others that are intended for users of all ages and families. Most of the information on the website is not primarily targeted for children since Dr Miric sees over 18-year-old patients.
- Our sites and applications offer a variety of activities, including activities that may collect information from children.
- Below we summarise potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent.
- In any instance that we collect personal information from a child, we will retain that information only for as long as reasonably necessary to fulfil the activity requested.
- If we discover we have collected information from a child in a manner inconsistent with legal requirements, **we will either delete the information or immediately seek the parent's consent for that collection.**

## 2. REGISTRATION

- During the registration process, we may ask the child to provide certain information for notification and security purposes, including a parent or guardian's email address, the child's first name and gender, the child's member or account username, and password.
- We will not use parent emails provided for parental consent purposes to market to the parent unless the parent has expressly opted into email marketing.
- **We strongly recommend children never use personal information in their usernames.**

- Please note that children can choose whether to share their information with us, but certain features cannot function without it. As a result, children may not be able to access certain features if required information has not been provided.
- **We will not require a child to provide more information than is reasonably necessary to participate in an online activity.**
- Consistent with the requirements of the law, in any instance where we ask for age and determine the **user is aged 18 or under, we will ask for a parent or guardian email address before we collect any personal information from the child.**
- If you believe your child is participating in an activity that collects personal information and you have **NOT received an email providing notice or seeking your consent, please feel free to contact us at [doctor@dramiric.co.za](mailto:doctor@dramiric.co.za)**

### 3. CONTENT GENERATED BY A CHILD

Certain activities on our sites and applications allow children to create or manipulate content and save it. These activities will not require children to give any personal information. **We strongly recommend children never include personal information in their content.**

### 4. VERIFIABLE PARENTAL CONSENT:

In the event that *Dr Antoinette Miric* wishes to collect personal information from a child, POPI requires that we first seek a parent or guardian's consent by email. In the email, we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent. **If we do not receive parental consent within a reasonable time, we will delete the parent's contact information and any other information collected from the child in connection with that activity.**

### 5. EMAIL CONTACT WITH A CHILD

- On occasion, to respond to a question or request from a child, Dr Antoinette Miric may need to ask for the child's online contact information, such as an email address.
- *Dr Antoinette Miric* will delete this information immediately after responding to the question or request.
- In connection with certain activities or services, we may collect a child's online contact information, such as an email address, to communicate with the child more than once. In such

instances, we will retain the child's online contact information to honour the request and for no other purpose such as marketing.

- **Whenever we collect a child's online contact information for ongoing communications, we will simultaneously require parents' email addresses in order to notify the parent about the collection and use of the child's information, as well as to provide the parents with an opportunity to prevent further contact with the child.**
- On some occasions, a child may be engaged in more than one ongoing communication, and a parent may be required to **"opt-in"** to each communication individually.

## **6. PUSH NOTIFICATIONS**

- Push notifications are notifications on mobile and other devices that are typically associated with downloaded applications, and which can communicate to the device holder even when the application is not in use.
- We will require a child to provide a parent's email address before the child can receive push notifications from our child-directed applications that collect a device identifier.
- We will then provide the parent with a notice of our contact with the child and will provide the parent with the opportunity to prevent further notifications.

## **7. WHEN INFORMATION COLLECTED FROM CHILDREN IS**

### **AVAILABLE TO OTHERS**

- In addition to those rare instances where a child's personal information is posted publicly (after receiving high-level parental consent), we may also share or disclose personal information collected from children in a limited number of instances, including the following:
  - We may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law.
  - We may also disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

## **8. PARENTAL CHOICES AND CONTROLS**

At any time, parents can refuse to permit us to collect further process personal information from their children in association with a particular account and can request that we delete from our records the personal information we have collected in connection with that account. Please keep in mind that a request to delete records may lead to a termination of an account, membership, or other services. Please see the [Withdrawal of Consent](#) form.

In any correspondence such as e-mail or mail, please include the child's username and the parent's email address and telephone number. To protect a child's privacy and security, we will take reasonable steps to help verify a parent's identity before granting access to any personal information.