NutriThrive (Pty) Ltd

Privacy Notice

Prepared in terms of the Protection of Personal Information Act 4 of 2013

and the Regulations relating to the Processing of Data Subjects' Health Information by Certain Responsible Parties, 2026

Effective date: 30 June 2026 | Version 1.0

1. Who We Are

NutriThrive (Pty) Ltd (registration number 2025/098241/07) is a registered dietetic practice based in Midrand & Pretoria, Gauteng. We provide nutritional and dietetic consultation services to patients and clients. In doing so, we collect and process your personal information, including health information, in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA" or "the Act") and, where applicable, the Regulations relating to the Processing of Data Subjects' Health Information by Certain Responsible Parties, 2026 ("the Health Regulations").

We are the responsible party in respect of the personal information we collect. Our contact details are set out below:

Practice name	NutriThrive (Pty) Ltd
Registration number	2025/098241/07
Physical address	62 Pretorius Road, Hertford Office Park, Vorna Valley, Midrand, Gauteng, 1686 & 65 Dely Road, Alphen Park, Pretoria, Gauteng, 0081
Telephone	084 799 5605
Email address	anefouriediet@gmail.com
Information Officer	Ane Fourie (Registered Dietitian)
HPCSA registration	DT0058416

2. What Personal Information We Collect

We collect the following categories of personal information in the course of providing our services:

2.1 Patient and Client Information

- Full name and identity number
- Date of birth and gender
- Contact details (telephone number, email address, and residential address)
- Medical history, current health conditions, and medication
- Dietary assessments, nutritional evaluations, and consultation notes
- Treatment plans, progress records, and follow-up notes
- Referral letters from, and correspondence with, other healthcare practitioners
- Medical aid scheme membership details and authorisation records
- Invoices, receipts, and payment information

2.2 Employee and Contractor Information (where applicable)

- Full name and identity number
- Contact details and residential address
- Employment contract details, payroll, and tax information
- Qualifications, training records, and leave records

2.3 Service Provider and Supplier Information

- Company name, registration number, and VAT number
- Contact details and bank account details for payment purposes

2.4 Healthcare Practitioner Information (Referrals)

- Name, practice number, HPCSA registration number, and contact details

3. Health Information — Special Category Data

Much of the personal information we collect as a dietetic practice constitutes “health information” as defined in the Health Regulations. Health information means personal information relating to the physical and/or mental health of a data subject, including information arising from the provision of healthcare services and any testing, treatment, and diagnosis that reveals information about your health status.

Health information is classified under POPIA as “special personal information” and receives a higher level of legal protection. We may only process your health information where we are specifically

authorised to do so in terms of section 27 of POPIA or where you have given your explicit consent. In practice, the primary justifications for our processing of your health information are:

- You have given your explicit, informed consent to us processing your health information for the purposes of your nutritional and dietetic care;
- Processing is necessary for the proper treatment and care of you as a patient, which is the core function of our registered health profession;
- Processing is necessary to comply with our legal obligations under the Health Professions Act 56 of 1974, the National Health Act 61 of 2003, and other applicable legislation; and
- Processing is necessary for the establishment, exercise, or defence of a legal right or obligation.

All persons who access your health information at NutriThrive are bound by a duty of confidentiality imposed by professional registration, employment, and where appropriate, written agreement, in accordance with Regulation 5.3 of the Health Regulations and section 32(2) of POPIA.

4. Why We Collect Your Personal Information

We collect and use your personal information solely for the following legitimate purposes:

4.1 Provision of Dietetic and Nutritional Services

We use your personal and health information to assess your nutritional status, develop and implement treatment plans, monitor your progress, and provide you with professional dietetic advice and care. This is our primary purpose and the core reason we collect health information.

4.2 Practice Administration

We use your information for scheduling appointments, generating invoices, processing payments, and managing our internal records in accordance with sound business and professional practice requirements.

4.3 Medical Aid and Insurance Claims

Where you are a member of a medical aid scheme, we may use your information to submit claims for services rendered and to obtain pre-authorisation for treatments. We process this information on the basis of your consent and our contractual obligations to you as a patient. If needed.

4.4 Communication and Referrals

We may use your contact details to communicate with you about your care, appointments, and follow-up treatment. With your consent, we may also share relevant health information with other treating healthcare practitioners to ensure continuity of your care.

4.5 Legal and Regulatory Compliance

We are required by law to create and retain certain records in relation to our professional practice, tax obligations, and compliance with healthcare legislation. We process and retain information for these purposes on the basis of our legal obligations.

4.6 Employment and Contractor Management (where applicable)

If you are an employee or contractor of NutriThrive, we process your personal information to manage our employment relationship, including payroll, leave management, and statutory compliance with employment legislation.

5. Legal Basis for Processing

We rely on the following grounds under POPIA to process your personal information:

Your Right	What this means
Consent	For most health information and direct patient care, we rely on your explicit, informed consent. You may withdraw your consent at any time, subject to legal or contractual constraints.
Contractual necessity	We process certain information because it is necessary to fulfil our agreement with you to provide dietetic services.
Legal obligation	We are required by law (including the Health Professions Act, National Health Act, and tax legislation) to process and retain certain records.
Legitimate interest	We may process certain information where we have a legitimate interest, provided this does not override your right to privacy.
Vital interests	In an emergency, we may process information to protect your vital interests or those of another person.

6. Who We Share Your Information With

We do not sell, rent, or trade your personal information. We share your information only in the following limited circumstances and only to the extent necessary:

6.1 Other Treating Healthcare Practitioners

With your consent, we may share relevant health information with other healthcare practitioners involved in your care, such as your general practitioner or specialist, to ensure continuity of treatment.

6.2 Medical Aid Schemes and Health Insurers

We submit claims and communicate with your medical aid scheme or health insurer on your behalf in connection with the authorisation and payment of your treatment. This processing is necessary to give effect to your membership benefits and our agreement with you.

6.3 South African Revenue Service

We are required to submit tax records and information to the South African Revenue Service (SARS) in accordance with the Income Tax Act 58 of 1962 and the Value-Added Tax Act 89 of 1991.

6.4 Health Professions Council of South Africa

We may be required to provide information to the HPCSA in connection with our professional registration, renewal, or in response to a formal inquiry or complaint.

6.5 Information Regulator

We may be required to provide information to the Information Regulator in the exercise of its functions under POPIA.

6.6 Payment Processing Providers

We use payment processing services to collect payment for our services. These providers are engaged as operators under POPIA and are bound by appropriate data processing agreements and confidentiality obligations.

6.7 Law Enforcement

We may disclose your information to the South African Police Service where required by law, for example in connection with criminal background verification of employees, or where we are compelled to do so by a valid court order.

7. International Transfers of Personal Information

NutriThrive does not currently transfer your personal information to parties in countries outside the Republic of South Africa. Should this position change, we will update this notice to reflect the countries involved and ensure that any transfer is made only in compliance with section 72(1) of POPIA and Regulation 6.1 of the Health Regulations, which require adequate protection to be in place in the receiving country.

Please note that our current email communications are conducted via a commercial email service. If you have concerns about the routing of email correspondence, we encourage you to communicate with us by telephone or in person at our practice.

8. How Long We Keep Your Information

We retain your personal information only for as long as is necessary for the purposes for which it was collected, or as required by law. The following general retention periods apply:

Category of Information	Retention Period
Patient health records	Minimum 6 years from the date of last treatment (Health Professions Act and HPCSA guidelines); or as otherwise required by law
Financial and tax records	Minimum 5 years from the date of the relevant transaction (Income Tax Act and Companies Act)
Employment records	Duration of employment, plus a minimum of 3 years thereafter (or as required by applicable employment legislation)
Medical aid correspondence	Retained in line with applicable health record retention requirements
General correspondence	Minimum 3 years, unless the correspondence relates to a legal matter
POPIA compliance documentation	Retained for the duration of the processing activity and for a reasonable period thereafter

At the end of the applicable retention period, health records are destroyed in a manner that prevents any reasonably anticipated unauthorised use, disclosure, or access to the information, as required by Regulation 5.2.2 of the Health Regulations.

9. How We Protect Your Information

As a responsible party that processes health information, we are legally required by Regulation 5 of the Health Regulations and section 19 of POPIA to maintain the confidentiality, integrity, and availability of your personal information. We implement the following appropriate, reasonable technical and organisational measures:

9.1 Physical Security

- Physical patient records are stored in locked filing systems accessible only to authorised staff.
- Access to areas where records are stored is restricted to personnel with a legitimate need to access those records.

9.2 Electronic Security

- All electronic devices used in the practice are password-protected with access controls.
- Antivirus and anti-malware software is installed and kept up to date on all practice computers.
- Secure email protocols are used for correspondence containing personal information.
- Patient records stored electronically are accessible only on a need-to-know basis.

9.3 Confidentiality and Access Controls

- All staff and contractors who access patient health information are bound by professional and contractual duties of confidentiality.
- Access to personal information is granted strictly on a need-to-know basis.

9.4 Record Disposal

- Physical records are destroyed securely at the end of their retention period in a manner that prevents unauthorised access or disclosure.
- Electronic records are deleted or rendered permanently inaccessible at the end of their retention period.

9.5 Review

We regularly review and update our security practices to remain aligned with generally accepted information security practices applicable to the healthcare sector, in accordance with Regulation 5.4 of the Health Regulations.

10. Your Rights

POPIA grants you the following rights in relation to your personal information held by NutriThrive. You may exercise any of these rights by contacting our Information Officer using the details provided in Section 12 of this notice.

Your Right	What this means
Right of access	You have the right to request confirmation of whether we hold personal information about you and, if so, to request a copy of that information. Requests must be submitted on the prescribed Form C, available from the Department of Justice (www.justice.gov.za).
Right to correction	You have the right to request that we correct or update your personal information if it is inaccurate, incomplete, misleading, or out of date.
Right to deletion	You have the right to request that we delete or destroy your personal information in certain circumstances, for example where the information is no longer necessary for the purpose for which it was collected, subject to our legal record retention obligations.
Right to object	You have the right to object, on reasonable grounds, to the processing of your personal information. We will consider your objection and cease processing unless we can demonstrate compelling grounds that override your rights, or the processing is required for the establishment, exercise, or defence of a legal claim.
Right to withdraw consent	Where we rely on your consent as the legal basis for processing, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing that occurred before the withdrawal, and may affect our ability to continue providing services to you.
Right not to be processed for direct marketing	You have the right to object to your personal information being used for direct marketing purposes, including electronic marketing. We will comply with any such objection promptly.
Right to complain	You have the right to lodge a complaint with the Information Regulator if you believe your personal information has been processed in a manner that does not comply with POPIA.

11. Lodging a Complaint

If you are unhappy with how we have handled your personal information, we encourage you to contact our Information Officer in the first instance so that we can attempt to resolve the matter. If you remain dissatisfied after contacting us, you may lodge a complaint with the Information Regulator:

Organisation	Information Regulator (South Africa)
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5207
Email	inforeg@justice.gov.za
Website	www.inforegulator.org.za

12. Contacting Our Information Officer

For any questions about this Privacy Notice, to exercise your rights, or to raise a concern about how we handle your personal information, please contact our Information Officer:

Information Officer	Ane Fourie
Title	Registered Dietitian & Information Officer
Physical address	62 Pretorius Road, Hertford Office Park, Vorna Valley, Midrand, Gauteng, 1686
Telephone	084 799 5605
Email	anefouriediet@gmail.com
HPCSA registration	DT0058416

You may also obtain a copy of our PAIA Manual, which sets out the procedure for submitting a formal request for access to information, by contacting us at the details above or by visiting our principal place of business during normal business hours.

13. Changes to This Privacy Notice

We will update this Privacy Notice from time to time to reflect changes in our practices, in applicable legislation, or in the way we handle personal information. The current version of this notice will always be available at our practice and, where applicable, on our website. Material changes will be brought to your attention. The effective date at the top of this notice indicates when it was last revised.