

TAH GROUP PRIVACY POLICY

1. Introduction

TAH respects your right to privacy. This Privacy Policy explains in detail the types of personal information we may collect about you when you interact with us. It also explains how we will store and handle that personal information, how we keep it safe, how you can exercise your privacy rights and how we combine data across TAH to build a picture of you.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided in the section of this Privacy Policy headed “How to contact us” [below](#).

2. What is TAH?

TAH is one of the largest small animal veterinary groups in South Africa, providing pet owners with all their needs: vet services, medication, food and accessories. The terms “we”, “us” or “our” in this Privacy Policy refers to:

- Tygerberg Animal Hospital partnership (including its veterinary practices, App and Websites);
- TAH Animal Hospital (Pty) Limited (including its vetshops); and
- Vetdiagnostix Veterinary Pathology Services (Cape) (Pty) Limited,

together “TAH”.

3. Personal Information

Personal information refers to all information about you as an identifiable individual, including your name, address, email address, telephone number, and identity number and all such further information as contemplated in the Protection of Personal Information Act No. 4 of 2013 (“POPI”).

4. When do we collect personal information collected

We collect your personal information in a number of instances, including when you:

- Register your details as a new customer at one of our veterinary practices or make appointments at one of our veterinary practices;
- Sign up to a TAH PetCare plan;
- Join our stamp card loyalty programme;
- Are referred by a vet to one of our specialist referral centres;
- Visit any of our Websites or our App;
- Engage with us on social media;
- Download or install our App;
- Contact us by any means with questions about a service, product or treatment or to raise a complaint;
- Ask one of our colleagues to email you information about a service, product or treatment;
- Enter prize draws or competitions;
- Use your loyalty stamp card;
- Choose to complete any surveys we send you;
- Use our micro-chipping service;
- Comment on or review our products and services. Any individual may access personal information related to them, including opinions. Therefore, if your

comment or review includes information about the colleague who provided that service, it may be passed on to them if requested;

- Fill in any forms;
- Have given a third party permission to share the personal information they hold about you with us;
- Phone us or we phone you; we may record phone conversations for record or training purposes; and/or
- Use our car parks or veterinary practices which usually may CCTV systems operated for the security of both customers and colleagues and for the prevention of crime. These systems may record your image during your visit.

5. **What personal information do we collect and why?**

The personal information that we collect about you broadly falls into the following categories:

Information that you provide voluntarily

When you register as a customer, book an appointment, join our stamp card loyalty programme, subscribe for products under our TAH PetCare plans, request a quote for pet insurance, download our App or enter a prize draw/competition, you will be asked for some essential information including your title, first name, surname, postal address, email address, telephone, details of your pet, login credentials for online services and, if applicable, payment information (credit or debit card number, expiry date and security code). These are collected to help us:

- Provide veterinary care to your pet;
- Register your details as a new client at one of our veterinary practices (or update your details if they change) or make appointments at one of our veterinary practices;
- Manage and process your TAH PetCare plans;
- Process payments due to us (including for treatments for your pet);
- Contact you about your pet, account or credit status where required;
- Prevent and detect fraud – to do this, we may need to disclose information to assist legal or debt recovery processes;
- Understand your needs and listen to your feedback via market research/analysis, customer polls and surveys;
- Enhance your TAH experience by delivering personally tailored offers;
- Send you reminders about appointments, vaccination dates and tick, flea and deworming treatment dates;
- Send you marketing and promotional offers and to manage your marketing preferences if you elect not to receive marketing and promotional offers from us. **You are entitled to inform us at any time if you do not wish to receive marketing communication;**
- Speed up your form filling processes if you've registered online;
- Respond to any issues or queries you may have;
- Conduct analytics to understand how our services are used; and/or
- Notify you about changes to our services.

It is your responsibility to obtain the necessary consent from a third party prior to submitting a third party's personal information to us, and you accordingly warrant that any such consent has been obtained in respect of any personal information provided by you.

Information that we collect automatically

When you visit our Websites or Apps, we may collect certain information automatically from your device.

Specifically, the information we collect automatically may include information like your IP address, device type, operating system, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Websites and App, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Websites and App, where they come from, what content on our Websites and App is of interest to them, what they have viewed or looked at and in some instances what they have purchased. We use this information for internal analytics purposes, to improve the quality and relevance of our Websites and App to our visitors and users and to deliver personally tailored retail offers (both on the website and through triggered email, SMS and App notifications (but only where you have agreed to these channels)).

Some of this information may be collected using cookies, tracking pixels and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. For example we may receive personal information from other veterinary professionals if you transfer from another veterinary hospital and register as a customer with us.

If you have any questions about the third parties we obtain personal information from, please contact us using the contact details provided under the “How to contact us” heading below.

Enhancing our data

Where we have obtained your personal information from various sources (including personal information we have lawfully obtained from third parties) we may combine this information in certain circumstances in order to enhance our understanding of your requirements and preferences in relation to our products and services. This is necessary for the purposes of our legitimate interests to ensure that we provide you the most appropriate offers for products and services and to personalise your TAH experience.

Conducting analytics

We will use the personal information we hold about you (as well as pseudonymised or anonymised information generated from your personal information) to carry out analysis and research. We carry out all such analysis and research on the basis that it is necessary for the purposes of our legitimate interests in understanding our clients and ensuring that our services and products meet the needs of our customers. We may undertake data analytics, whereby we may combine information we hold on a large scale in order to:

- Learn more about our customers and their preferences;
- To identify patterns and trends amongst our customers;
- Enhance user experience on our Websites and App;
- Provide information, content and offerings tailored to our customers' needs;

- For general research and statistical purposes;
- For aggregated reporting purposes within TAH;
- To help us develop new services, treatment plans, health plans and products;
- To monitor performance of our services;
- To be able to send you personalised marketing messages; and
- To display online advertisements to you.

We will use your personal information (including by anonymising and aggregating it with other customers' personal information) for sales, supply chain and financial analysis purposes, to determine how we are performing and where improvements can be made. This is necessary for the purposes of our legitimate interests in understanding how our business is performing and considering how to improve our performance.

6. Who do we share your personal information with?

We may disclose your personal information to the following categories of recipients:

- To any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out herein;
- to **other veterinary professionals**, if you request that we transfer your pet's patient history on transferring to another veterinary practice;
- to insurance companies with whom you have insured your pet or from whom you are seeking a quote for pet insurance;
- to laboratories and other suppliers who you have agreed we may provide your details to and who require them in order to provide services in relation to your pet;
- to our third party services providers and business partners who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information. Examples of the kind of third parties we work with are:
 - IT companies who support our Websites, App and other business systems;
 - Direct marketing companies or other third parties who help us manage electronic communications with you;
 - [Google](#), Facebook, Instagram, Twitter and similar platforms to show you services that might interest you while you're browsing the internet; This is based on either your marketing consent or your acceptance of cookies, tracking pixels or similar tracking technology on our websites, as explained further under the heading "Cookies and similar tracking technology" below; and/or
 - Data insight and data analysis companies (to provide us with tools to analyse the data which we hold);
 - Promotional partners;
 - Customer review companies (so you can leave feedback and we can improve our service to you); and/or
 - Competition or prize-draw partners
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights or apply our Terms and Conditions, or (iii) to protect your vital interests or those of any other person;
- to transfer our customer database(s), including personal information contained therein, to any third party who acquires all or substantially all of the assets or shares in our company whether by sale, merger, acquisition or otherwise;

Where we share your personal information with third party service providers and partners, we apply a policy to ensure your personal information is safe and in order to protect your privacy. Our policy requires:

- We provide only the information they need to perform their specific services;
- They may only use your data for the exact purposes we specify in our contract with them;
- We work with them to ensure that your privacy is respected and protected at all times;
- If we stop using their services, any of your personal information held by them will either be deleted or rendered anonymous (subject to applicable law).

If you have any questions about the third parties we share your personal information with, please contact us using the contact details provided under the "[How to contact us](#)" heading below.

7. Cookies and similar tracking technology

We use cookies and similar tracking technologies (collectively, "Cookies") to collect and use personal information about you. A cookie is an alphanumeric identifier which we transfer to your hard drive through your web browser when you visit our Websites. It enables our own system to recognise you when you visit our Websites again and to improve our service to you. Cookies may also be used to compile aggregate information about areas of our Websites that are visited most frequently. This information can be used to enhance the content of our Websites and make your use of it easier. You can disable our use of cookies by configuring your browser accordingly, but this may result in certain parts of the Website not being accessible.

8. Storage of personal information

We use all reasonable endeavours to put in place and maintain electronic procedures and systems to ensure accuracy and to prevent unauthorised access to your personal information with reference to accepted technological standards.

9. Legal Disclaimer

We reserve the right to disclose your personally identifiable information to governmental bodies, exchanges and other regulatory or self-regulatory organisations if we are required to do so by law or if we believe that such action is necessary. In addition, we may disclose information if required to do so to any regulatory authorities in connection with any investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability.

10. Links

Our Websites and App may contain links to other websites. Please note that we are not responsible for the privacy practices of third-party websites or the manner in which they use cookies and advise you to read the privacy statements of each website you visit which collects personal information.

11. Notification of a personal information security breach

We shall:

- notify you in writing, immediately, if we become aware or have reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, and take all appropriate steps to limit the compromise of

personal information and to restore the integrity of the affected information systems as quickly as possible;

- as soon as reasonably possible thereafter, engage with any persons who may be appointed by us to discuss the security breach, to report all relevant facts relating to the compromise and steps to be taken to mitigate the extent of the compromise and loss occasioned by the compromise; and
- provide you with details of the personal information affected by the compromise, including but not limited to, the nature and extent of the compromise, and, where possible, details of the identity of the unauthorised person/s who are known to or who may reasonably be suspected of, having accessed or acquired the personal information.

Immediately upon notifying you as set forth above, we shall:

- at our own cost, take all necessary steps to mitigate the continuation of the compromise, the repetition of a similar compromise, and mitigate the extent of the loss occasioned by the compromise of the personal information;
- implement all measures reasonably necessary to restore the integrity of our information system(s); and
- notify all affected persons.

12. Your Rights

You have the right to decide which personal information is kept about you. We shall provide you (free of charge) with confirmation whether or not we hold personal information about you and with further details regarding the personal information so held (if applicable). If you are concerned that any of the information so held is incorrect, please contact us immediately. You are further entitled to request that any such information be deleted or the use thereof restricted.

You are entitled to instruct us not to utilise your personal information for direct marketing purposes or in any further manner by contacting us using the contact details provided in the section of this Privacy Policy headed “How to contact us” [below](#).

13. How to contact us

It is very important that the information that we hold about you is accurate and current. If you would like to receive a copy of the information we hold about you (subject to our right to charge you a fee to cover our expenses in this regard), to correct or update your information or how we use it, or to ask any questions about this Privacy Policy, please contact us at the following address: privacy@tah.co.za.

14. Communicating with you / Opting Out

We provide you the opportunity to ‘opt-out’ of having your personally identifiable information used for certain purposes when we ask for this information.

15. Changes to this Privacy Policy

We reserve the right to modify this policy at any time, so please review it frequently. If we decide to change this policy, we will post changes to this page.

The amended Privacy Policy will supersede and replace any previous policies with effect from the date on which it is posted on our website.