

Privacy Policy

Radhiant Diagnostic Imaging SA Inc | Version 2.0 | 14 September 2026

This policy explains what personal information we hold about you, why we hold it, who we share it with, how long we keep it and what you can ask us to do about it. Please read it. Every term of it matters.

It replaces both earlier versions in full: the policy marked V1.0 and the shorter company privacy policy of April 2026.

1. About the practice

Radhiant Diagnostic Imaging SA Inc is a private radiology practice. We provide mobile mammography and diagnostic imaging services across South Africa, taking screening to workplaces, communities and other sites rather than asking every woman to travel to a fixed centre.

How to contact us

- Registered name: Radhiant Diagnostic Imaging SA Inc
- Registration number: 2022/578286/21
- Practice number: 1045385
- Address: 12 Athlone Crescent, East London, 5201
- Telephone: 087 077 0000
- Email: info@rdisa.co.za
- Website: www.rdisa.co.za

2. Our Information Officer

The Information Officer is responsible for how we look after personal information and for answering any request or complaint about it.

- Information Officer: Dr Anith Chacko, Chief Executive Officer
- Deputy Information Officer: Samantha Le Roux
- Email: info@rdisa.co.za
- Telephone: 087 077 0000

Our Head of Information Technology supports the Information Officer on system security and access control.

- Head of Information Technology: Damon du Randt, it@radhiant.com

3. What the words mean

Personal information

Information about an identifiable person. It includes a name, an identity number, contact details, age, gender, images and medical information.

Special personal information

More sensitive information, including health information, race or ethnic origin, religious or philosophical beliefs, trade union membership, political persuasion, sex life and biometric information. Everything we hold about a patient examination is special personal information.

Processing

Anything we do with personal information: collecting it, recording it, storing it, using it, sharing it, correcting it or destroying it.

Data subject

The person the information is about. That may be a patient, an employee, a job applicant, a supplier or anyone else we deal with.

POPIA

The Protection of Personal Information Act, Act 4 of 2013, and its Regulations.

4. Who this policy covers

This policy covers everyone whose personal information we hold, not only patients:

- Patients and the people responsible for their accounts
- Employees, independent contractors and job applicants
- Referring doctors and other healthcare practitioners
- Suppliers, vendors and corporate clients
- Visitors to our premises and our mobile units

5. Our commitment

We collect only what we need. We use it only for the purposes set out in this policy. We keep it no longer than the law allows. We share it only where this policy or the law permits. And we keep it secure.

Where we have no other lawful basis to process your information, we will ask for your consent, and you may withdraw that consent at any time.

6. What we collect

Patients

- Name and surname, identity number, date of birth, age, gender and nationality
- Contact details and address
- Name and contact details of your next of kin

- Medical scheme or other funder details
- Health status and medical history relevant to the examination
- The images taken, the radiologist report and any related results
- Billing and payment details
- Consent forms and correspondence

Employees, contractors and job applicants

- Name and surname, identity number, date of birth, contact details and address
- Qualifications, HPCSA or other statutory council number, and information on a curriculum vitae
- Employment records, bank details and payroll information
- Professional indemnity cover and membership of professional bodies
- Screening and vetting results where these are required for the role

Suppliers, corporate clients and other organisations

- Organisation name, registration details and contact details
- Names and contact details of the people we deal with
- Agreements, invoices, banking details and correspondence

7. How we collect it

We collect information directly from you wherever we can. We may also receive it from your referring doctor, another healthcare practitioner involved in your care, your next of kin, your medical scheme, or the employer or organisation that arranged the screening day you attended.

Giving us this information is usually necessary for us to provide the service. Where something is optional, we will say so when we ask for it.

8. Why we process it

- To provide imaging and screening services and care for patients safely
- To identify you correctly before an examination
- To keep accurate medical and practice records
- To contact you about your appointment, to remind you, and to send you your result
- To bill you or your medical scheme and to recover what is owed
- To manage the practice, including audits, quality reviews and patient satisfaction surveys
- To employ and manage our people
- To meet our legal, regulatory and professional obligations
- To maintain and test our systems, under confidentiality undertakings
- To defend or bring a legal claim
- For statistical and research purposes, in a form that does not identify you

9. Our lawful basis

We process personal information because it is necessary to perform our agreement with you, because the law requires it, or to protect your or our legitimate interests. Health information is special personal information, and we process it as POPIA permits medical professionals to do where it is necessary for the proper treatment and care of a patient. Where none of these applies, we ask for your consent.

10. Screening at workplaces, communities and other sites

Much of our work happens on a mobile unit parked at an employer, a clinic, a shopping centre or a community site. Often an employer, a medical scheme or another organisation arranges and pays for that day. This section explains what that organisation does and does not get to see.

What the organisation receives

- Numbers: how many people booked, how many attended and how many did not
- Anonymous summary information about the day
- Invoices and administrative reporting

What the organisation never receives

- Your result, your report or your images
- Any finding about you, whether normal or not
- Confirmation that you personally attended or did not attend

We will only give an organisation information that identifies you if you give us separate written permission first. Our staff may not confirm to an employer whether a named person attended, and may not discuss any patient with anyone at the site.

Your result goes to you. Where you nominate a doctor, we send it to that doctor as well.

11. When you give us information about someone else

If you give us personal information about another person, for example a next of kin or a dependant, you must be entitled to do so. Please make sure they know we hold their information and how we will use it.

12. Who we share it with

For patients

- The radiologist who reads your images and any treating practitioner involved in your care
- The doctor you nominate to receive your result
- Your medical scheme or other funder, for payment
- Your next of kin, where this is necessary and permitted
- The person or organisation responsible for paying your account
- Our own staff and service providers who need it to do their work, under confidentiality undertakings

- Debt collectors and attorneys, where an account is unpaid
- Our insurers, auditors and professional advisers
- Courts, regulators and law enforcement, where the law requires or permits it

For employees, suppliers and others

- Our own staff and service providers on a need-to-know basis, under confidentiality undertakings
- Funders, insurers, employment agencies and vetting agencies, where applicable
- Bodies performing peer review, for practitioners
- Our auditors, professional and legal advisers
- Courts, regulators and law enforcement, where the law requires or permits it

We do not sell personal information, and we do not share it for marketing by anyone else.

13. How long we keep it

We keep patient records in line with the Health Professions Council of South Africa guidance and other applicable law:

- Patient records: six years from the date the record becomes dormant
- Records of a patient who was a minor at the time: until that person turns 21
- Records of a patient who is mentally incompetent: for the life of the patient
- Records relating to an employer-funded occupational health mammogram: 20 years, as required under occupational health and safety law

We keep other records for the periods the law sets: employment records for at least three years after the employment ends, and company, accounting and tax records for seven years. Records of unsuccessful job applicants are kept for one year and then destroyed.

When a retention period ends we destroy the record securely, unless the law requires us to keep it for longer.

14. Where your information is kept

Your records are held in South Africa. The imaging, booking and billing systems that hold patient information run on infrastructure located in South Africa, and patient images and reports are not sent out of the country.

Some of our general business systems, such as email and document storage, are run by international providers. Where any personal information is processed outside South Africa through those systems, we use only providers bound by a law, a binding agreement or rules that give your information protection comparable to POPIA. If our arrangements change, we will update this policy before the change takes effect.

15. How we protect it

We secure our offices and our mobile units, lock physical records away, control who may access our systems, use passwords and access rights that match a person's role, and back up data off site.

Only the employees and service providers who need your information to do their work may see it, and only once they have signed confidentiality undertakings.

On our mobile units, patient lists and screens are kept out of sight of other people at the site. Staff may not photograph patient information or send it using personal devices or personal messaging accounts.

16. If something goes wrong

If we have reason to believe that someone has gained unlawful access to your personal information, we will notify you and the Information Regulator as soon as reasonably possible, unless a public body directs us to delay while an investigation is under way.

17. Your rights

- To ask what personal information we hold about you, and to receive a copy
- To ask us to correct or delete information that is wrong, misleading or no longer needed
- To object to processing based on legitimate interests, where it is reasonable to do so
- To withdraw consent, where consent is what we relied on
- To complain to us, and to the Information Regulator

Requests must be made in writing to the Information Officer on the form prescribed under POPIA. We will tell you if a fee applies. We may not be able to delete information the law requires us to keep, and we will explain it if that is the case.

Drafting note: the practice does not yet have a PAIA manual. This is a separate outstanding obligation and this policy deliberately does not refer to one.

18. Keeping your information accurate

Please tell us as soon as your details change. Wrong contact details are the most common reason a patient does not receive her result.

19. Complaints

If you are unhappy with how we have handled your personal information, contact our Information Officer first. We would rather hear from you and put it right.

You may also complain to the Information Regulator:

- Information Regulator (South Africa), JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Postal: P.O. Box 31533, Braamfontein, Johannesburg, 2017
- General enquiries: enquiries@inforegulator.org.za

- Complaints: POPIAComplaints@info regulator.org.za

20. Changes to this policy

We may update this policy to reflect changes in the practice or in the law. The current version is published on www.rdisa.co.za and is available on request from any of our sites. The version and date below tell you which one you are reading.

21. Governing law

This policy is governed by the laws of the Republic of South Africa.

Version control

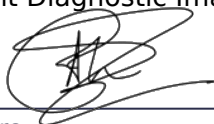
Version	Date	Owner	Status	Next review
2.0	14 September 2026	Information Officer	Approved on signature	12 months from signature
1.1	28 April 2026	Administration	Superseded by this version	
1.0	28 April 2026	Not stated	Superseded by this version	

Approval

This policy takes effect on the date of signature below and replaces every earlier version of the Radhiant Diagnostic Imaging privacy policy in full.

Approved by

Dr Anith Chacko
Information Officer and Chief Executive Officer
Radhiant Diagnostic Imaging SA Inc



Signature

14 September 2026

Date

Effective date: the date of signature above. Next review: 12 months from the effective date.

Once signed, this policy is a public document. It is published on www.rdisa.co.za and available on request at any Radhiant site.