



CHIROPRACTIC ASSOCIATION OF SOUTH AFRICA PRIVACY POLICY

WHAT IS PERSONAL INFORMATION?

Personal information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.



WHAT PERSONAL INFORMATION IS COLLECTED?

When you visit, browse, register, or interact with the Association (including via our website and event/CPD systems), we may collect:

- • Name and surname
- • Professional details (practice name, AHPCSA number, membership number, category)
- • Contact details (email, phone, physical/postal address)

- • Identification numbers where required by law (e.g., ID/Passport, VAT for invoicing)
 - • Payment and billing details necessary to process fees and transactions
 - • Event and CPD registration details (sessions selected, attendance records)
 - • Communications you send to us (queries, complaints, feedback)
- Technical/usage data (IP address, device/browser type, pages visited, timestamps, and analytics)

Note: Health-related information is not routinely collected by the Association. If you voluntarily provide such information in correspondence or programme participation, it will be handled with appropriate safeguards.

The Association may also collect, use and share aggregated data such as statistical or demographic data for any purpose.

Aggregated data may be derived from your personal information but is not considered personal information in law as this information does not, directly or indirectly, reveal your identity.

PURPOSES FOR WHICH THE ASSOCIATION USES YOUR PERSONAL INFORMATION

We process personal information to:

- a) • Administer memberships, renewals, and member accounts
- b) • Register, manage, and accredit CPD activities, webinars, congresses, and events
- c) • Process payments, invoices, refunds, and financial reconciliations
- d) • Communicate association updates, governance notices, CPD opportunities, and operational messages
- e) • Manage committees, elections, surveys, and stakeholder engagement
- f) • Respond to enquiries, support requests, complaints, and disciplinary/ethics matters
- g) • Maintain our website, platforms, and analytics, and diagnose technical issues
- h) • Comply with legal and regulatory obligations (PAIA/POPIA, tax and audit, regulator reporting)
- i) • Detect, prevent, or address fraud, security, or policy violations
- j) •

CATEGORIES OF PERSONAL INFORMATION

The Association processes many different categories of personal information including, but not limited to:

- Contact details, such as phone numbers, physical and postal addresses, and email addresses;
- Personal details, such as names, family information, and ages;
- Demographical details, such as race and age groups;
- Health information;
- In some cases, biometric information;
- Financial information, such as account numbers;
- Special personal information as it may relate to your medical treatment;
- Market intelligence information that may relate to your well-being;
- Medical scheme information; and Background information.

PROTECTION OF YOUR PERSONAL INFORMATION

The Association takes the security of your personal information very seriously.

The Association recognises the vital role that information technology plays in its daily operations, and the reliance placed on IT systems in processing personal information.

Although absolute security cannot be guaranteed, the Association will take reasonable technical and organisational measures to protect your personal information against accidental, unauthorised or intentional manipulation, loss, misuse, destruction, disclosure or access.

The Association's security measures are regularly verified for its operating effectiveness.

Reasonable mechanisms, tools and technologies have been implemented to detect, prevent and respond to security violations. Information security policies and procedures that govern security safeguards are in place, including dedicated teams and business processes to govern instances of non-compliance with privacy policies, procedures or applicable law.

If the Association becomes aware of a security compromise involving personal information, we will notify the Information Regulator and affected data subjects as soon as reasonably possible, in line with section 22 of POPIA and the Regulator's guidelines.

The Association may disclose your personal information if authorised to do so by law.

The Association also engages with various third parties, to improve its service, create efficiency in its operations, and contribute towards the overall wellbeing of users and members/participants.

The Association will share your personal information if:

- you have provided consent;
- it is for the proper treatment and care of yourself; and/or
- it is in accordance with applicable law.

When the Association shares your information with any third party, we will be required to respect your right to privacy and the Association will ensure that we have the necessary safeguards in place to secure your personal information.

The Association will only allow third parties to process your personal information for a specific purpose, in accordance with the Association's instructions and applicable law.

RETENTION OF YOUR PERSONAL INFORMATION

The Association retains personal information only for as long as necessary to fulfil the purposes described in this policy, including for legal, accounting, audit, or reporting requirements.

Typical periods include (guidance): membership and committee records for the duration of membership/appointment plus an additional period; financial records (e.g., invoices, payments) for at least five years as required by tax and corporate law; CPD and event records for applicable accreditation/audit periods; complaints/disciplinary records in line with Association rules and lawful retention needs. Thereafter, information is securely deleted or de-identified.

Access to records is governed by the Promotion of Access to Information Act, 2000 (PAIA).

DIRECT MARKETING

The Association may send members and stakeholders information about association activities, CPD opportunities, events, and governance updates. You can opt out of direct marketing at any time by using the unsubscribe option in our emails or by contacting us (see Important Information).

STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION

The Association stores your personal information on its servers and/or on third party servers.

The Association reserves the right to transfer to and/or store your personal information on servers in a jurisdiction other than where it was collected. If the location where personal information is transferred to does not have substantially similar laws which provide for the protection of personal information, the Association will take reasonably practicable steps to ensure that your personal information is adequately protected in that jurisdiction.

Where cross-border transfers occur, the Association will implement appropriate safeguards as required by POPIA (section 72), such as contractual protections and due-diligence on operators.

COOKIES

When using the Association's website, the Association uses Cookies to understand your online activity, and save your preference for future visits.

A cookie is a small piece of data sent from our website to your computer or device or internet browser where it is saved.

The cookie contains information to personalize your experience on the Association's website and applications.

The cookie has the ability to identify your device, computer or smart phone.

By using the Association's website and applications you agree that cookies may be forwarded from the relevant website or application to your computer or device.

The Association may use the cookie to confirm that you visited the website.

You have the right to choose whether or not to accept cookies. However, please note that if you do not accept the cookies, you may not be able to use the full functionality of the website or mobile applications.

When you interact with the Association's website, you will come across links to other websites and applications.

The Association is not responsible for the security of those websites, or the information that it contains. In some cases, links are provided as a value added service for information purposes only. Please remember that when you click on a link on the Association's website and you are taken to another web page or website or application that this Privacy Policy will no longer apply.

You also acknowledge that by clicking on a link, that you do so at your own risk and hold the Association harmless against any loss or damage that may occur.

PROCESSING OF CHILDREN'S INFORMATION

The Association respects the rights of children. We only process children's personal information with the consent of a competent person or where permitted or required by law (for example, participation in educational campaigns, competitions, or community initiatives).

PURPOSE STATEMENT

The Association may share necessary personal information with relevant stakeholders (e.g., regulators, accreditation bodies, service providers) strictly for the purposes described in this policy and in line with applicable law.

CHANGES TO THIS PRIVACY POLICY

From time to time, changes will be required to this Privacy Policy. Please check this website to inform yourself of any changes made to this Privacy Policy.

YOUR RIGHTS

The Association will, at all times, process your personal information in accordance with applicable laws and your rights are set out below:

- You have the right to correct your personal information if it is incorrect;
- You have the right to update your personal information if your details have changed;
- You have the right to object to the processing of your personal information;
- You have the right to your personal information being deleted; and
- You have the right to be informed if your information has been deleted. If you would like to exercise any of your rights:
 - Submit any objection that you may have; or
 - Request destruction of your personal information if it is being retained for longer than required by law;

You acknowledge that, in some cases, the Association may not be able to comply with your request to delete or destroy your personal information if this request conflicts with applicable law.

You may also request access to your personal information (or records under PAIA), withdraw consent where processing is based on consent, and lodge a complaint with the Information Regulator. To object to processing use POPIA Form 1; to request correction/deletion use POPIA Form 2; to request access to records under PAIA use Form 02 (see links below).

You have the right to complain to the Information Regulator, whose contact details are:

Information Regulator

Information Regulator (South Africa)

Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Tel: 010 023 5200 | Toll-free: 0800 017 160

Email: enquiries@inforegulator.org.za

PAIA forms: inforegulator.org.za/paia/

POPIA forms: inforegulator.org.za/popia-forms/

Information Officer : Dr Bridget Bromfield

Tel: 086 188 7772

Email: info@chiropractic.co.za

DECLARATION

By continuing to use our website or services, you acknowledge that you have read and understood this Privacy Policy and consent to the processing of your personal information for the purposes set out herein, where such consent is required by law.

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