QALO DIGIHEALTH PRIVACY POLICY

LAST UPDATED: OCTOBER 2026

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

INTERPRETATION AND DEFINITIONS Interpretation

The words in which the initial letter is capitalised have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Qalo Digihealth Proprietary Limited (**Qalo Digihealth**), 123 Jan Smuts Avenue, Parkwood, Johannesburg, Gauteng, 2193.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Country** refers to the Republic of South Africa.

- **Device** means any electronic device that can access the Service such as a computer, a cellphone, or a digital tablet.
- Information Regulator means the statutory body established in terms of POPIA, responsible for regulating and enforcing compliance with POPIA and PAIA.
- **PAIA** refers to the Promotion of Access to Information Act 2 of 2000 and any regulations promulgated thereunder.
- **Personal Data** (also referred to as "**Personal Information**" in this Agreement) refers to any information that relates to an identified or identifiable individual as defined under POPIA.
- **POPIA** refers to the Protection of Personal Information Act 4 of 2013 and any regulations promulgated thereunder.
- **Service** refers to the Website.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company (also referred to as an Operator under section 1 of POPIA). It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service, or to assist the Company in analysing how the Service is used.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Website** refers to the Qalo Digihealth website, accessible from https://qalodigihealth.co.za/
- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable i.e., the Data Subject as defined under section 1 of POPIA.

COLLECTING AND USING YOUR PERSONAL DATA

Types of Data Collected

Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Usage Data

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse Our Service. The technologies We use may include:

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

Flash Cookies. Certain features of our Service may use local stored objects (or Flash Cookies) to collect and store information about Your preferences or Your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies.

Web Beacons. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single pixel gifs) that permit

the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies Type: Session Cookies Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy / Notice Acceptance Cookies Type: Persistent Cookies Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.
Functionality Cookies Type: Persistent Cookies Administered by: Us
Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

USE OF YOUR PERSONAL DATA

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including monitoring the usage of our Service.
- **To manage Your Account**: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract**: the development, compliance, and undertaking of the purchase contract for the products, items, or services You have purchased or of any other contract with Us through the Service.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application’s push notifications regarding

updates or informative communications related to the functionalities, products, or contracted services, including the security updates, when necessary or reasonable for their implementation.

- **To provide You** with news, special offers, and general information about other goods, services, and events that we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests**: To attend and manage Your requests to Us.
- **For business transfers**: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganisation, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Service, products, services, marketing, and your experience.

We may share and or use Your Personal Information for the following purposes:

- **With Service Providers**: We may share Your personal information with Service Providers to monitor and analyse the use of our Service, to contact You.
- **For business transfers**: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates**: We may share Your information with Our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners, or other companies that We control or that are under common control with Us.
- **With business partners**: We may share Your information with Our business partners to offer You certain products, services, or promotions.
- **With other users**: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.

- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

RETENTION OF YOUR PERSONAL DATA

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

TRANSFER OF YOUR PERSONAL DATA

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your continent, state, province, country or other governmental jurisdiction where the data protection laws may differ from those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of Your data and other personal information.

DISCLOSURE OF YOUR PERSONAL DATA

Business Transactions

If the Company is involved in a merger, acquisition, or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public; or
- Protect against legal liability

SECURITY OF YOUR PERSONAL DATA

We are obliged under POPIA to provide adequate protection for the Personal Information that we store and process to prohibit unauthorised access and use of the Personal Information.

It is important to remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data. We will, on an on-going basis, continue to review our security controls and related processes to ensure that Your Personal Information remains secure.

Our security internal policies and procedures cover:

- Firewalls
- Secure web gateways
- Regular vulnerability scans of IT networks and systems
- Cybersecurity awareness training for all employees
- Virus protection software and update protocols
- Logical and physical access control
- Secure setup of hardware and software making up the IT infrastructure
- Requiring Operators who Process Personal Information on behalf of Qalo Digihealth to implement security controls in terms of Qalo Digihealth contract with them

When we contract with third parties i.e., Operators we impose appropriate security, privacy, and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to under POPIA.

PRIVACY RIGHTS

South African law provides you with certain rights with regard to your Personal Information under the Protection of Personal Information Act (**POPIA**) and Promotion of Access to Information Act (**PAIA**), as well as the Consumer Protection Act. Throughout this Privacy Notice you will find the information required by POPIA regarding the type of personal information collected from you; the purposes for which we use personal information, and the third parties your data may be shared with.

POPIA and PAIA provide you with the ability to make inquiries and requests regarding your Personal Information. Specifically, the degree to which information is not already provided in this Privacy Notice, you have the right to request disclosure or action on Your Personal Information, including:

- Access to Your Personal Information if the information is collected by us.
- The specific pieces of Personal Information collected about You.
- The ability to rectify inaccurate or incomplete Personal Information collected about You.
- The ability to delete all the Personal Information collected about You, subject to certain exceptions and legal obligations.
- The ability opt-in or opt-out of direct marketing to You.
- The ability to object to the processing of your Personal information, save where We may be entitled to continue using Your information and/or refuse your request; or
- The ability to appeal any rejection of access to Your Personal Information.

Access

If we receive a request from you, we will first make a determination regarding the applicability of the law, and we will then take steps to verify your identity prior to responding. The steps to verify your identity may vary based on our relationship with you, but, at a minimum, it will take the form of confirming and matching the information submitted in the request with information already held by Qalo Digihealth and/or contacting you through previously used channels to confirm that you

submitted the request (i.e. confirming identity through the contact information that we have on file, and/or the contact information submitted to make the request).

DATA PORTABILITY

You can ask Us to receive the Personal Information that We hold in relation to You in a structured, commonly used, and machine-readable format, to allow You to pass it to a third party, or where technically feasible to have such data transmitted directly to a third party by Us. This right applies if We are using Your data based on your consent or on a contract with You and if We are using an automated method to process it.

Qalo Digihealth does not knowingly collect or process the special personal information such as your religious or philosophical beliefs, race or ethnic origins, trade union memberships, political persuasion, health or sex life, or your criminal behaviour or biometric information.

CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information and Personal Information from anyone under the age of 18. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 18 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your Personal Information and Your country requires consent from a parent or guardian, We may require Your parent's/guardians consent before We collect and use that Personal Information.

LINKS TO OTHER WEBSITES

Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

WITHDRAWAL OF CONSENT

Where We rely upon Your consent to use Your Personal Information, You have the right to withdraw consent at any time, without affecting the lawfulness of the processing based on Your consent before the withdrawal.

OBJECTION

In certain cases, We may use Your Personal Information where it is within our legitimate interests to do so. When this is the case, You have the right to object to Us using Your Personal Information in this way. There may be situations where We are entitled to continue processing Your Personal Information and/ or to refuse your request. If we refuse to Your request, We will provide You with reasons.

QUERIES AND COMPLAINTS

If you have a comment, question, or complaint about how we are processing your Personal Information, contact our Information Officer at io@enormegroup.com. In addition, you also have the right to submit a complaint regarding the processing of your personal information to the Information Regulator of South Africa. The details of the Information Regulator are as follows:

The Information Regulator

Physical Address:

JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Postal Address:

P.O. Box 31533
Braamfontein
Johannesburg
2017
Email: POPIAComplaints@inforegulator.org.za

CHANGES TO THIS PRIVACY POLICY

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the “Last updated” date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

CONTACT US

If you have any questions about this Privacy Policy, You can contact us:

By email: io@enormegroup.com
Physical Address: 123 Jan Smuts Avenue, Parkwood, Johannesburg, 2193.