



# Vitality Connect (Pty) Ltd – Health Data Privacy Policy

**Effective Date: 1 August 2024**

Vitality Connect (Pty) Ltd (“Vitality Connect”, “we”, “us”, or “our”) is committed to protecting your personal health data. This Health Data Privacy Policy explains how we collect, use, store, and protect health-related personal information you share with us through our website, app, services, and communications (“Services”). This Policy forms part of our overall **Privacy Policy** and **Terms of Service**, and is intended to ensure compliance with the **Protection of Personal Information Act (POPIA)** and applicable South African and international standards.

## 1. What is Health Data?

“Health data” includes any personal information that relates to your physical or mental health, medical conditions, genetic or biometric data, or lifestyle and wellness behaviours. Examples include:

- Medical conditions, history, or symptoms
- Nutrition, exercise, and sleep habits
- Hormonal and metabolic assessments (e.g., methylation, DUTCH or blood test results)
- Supplement usage and wellness protocols
- Health tracking from wearable devices
- Results from any assessments or questionnaires submitted to Vitality Connect

## 2. How We Collect Health Data

We collect health data through the following means:

- Information you voluntarily provide when using our Services (e.g., quizzes, assessments, coaching sessions, email courses, blog comments)



- Data you upload to your Vitality Connect account or submit through forms
- Communication with our wellness professionals, coaches, or customer support team
- Integration with third-party health trackers or apps (only when you provide explicit consent)

### 3. How We Use Your Health Data

We use your health data only for legitimate and specific purposes, including:

- To personalise wellness content, recommendations, and educational resources
- To provide digital wellness coaching and course content tailored to your profile
- To process test results, if applicable, and guide wellness interventions
- To improve our Services and user experience through aggregated insights
- To fulfil legal or regulatory obligations, where required

We do **not** use your health data for:

- Automated decision-making that produces legal effects
- Marketing unrelated third-party products without consent

### 4. Consent and Your Rights

By using our Services, you **consent** to the collection, use, and processing of your health data as described in this policy. Under **POPIA**, you have the right to:

- Access and request a copy of your personal health data
- Request correction, deletion, or limitation of use
- Withdraw your consent at any time
- Lodge a complaint with the **Information Regulator of South Africa**

To exercise these rights, email us at [privacy@vitalityconnect.co.za](mailto:privacy@vitalityconnect.co.za).



## 5. Sharing Your Health Data

We may share your health data only in the following circumstances:

- With your explicit consent, to wellness professionals or service providers working with you
- With accredited laboratories or testing providers (e.g., for DNA or hormone testing), only for the services you've agreed to
- With third-party service providers who process data on our behalf under binding confidentiality agreements
- As required by law or to protect vital interests

We do **not** sell your health data or share it with advertisers.

## 6. Data Storage and Security

We implement technical and organisational security measures to protect your health data, including:

- End-to-end encryption of sensitive information
- Secure access controls
- Data minimisation and retention policies (only storing data as long as necessary for the purpose)

All data is stored on secure servers, either locally in South Africa or with providers who comply with POPIA and international data transfer safeguards (e.g., GDPR equivalency for cross-border data transfers).

## 7. Children's Health Data

Our Services are not intended for use by children under the age of 18 without the involvement of a parent or legal guardian. We do not knowingly collect health data from minors without verified consent.

## 8. Updates to This Policy



We may revise this Health Data Policy from time to time. We will notify you of material changes via email or prominent notices on the Site. Your continued use of the Services after changes are posted constitutes acceptance of the revised policy.

## 9. Contact Us

If you have questions or concerns about how your health data is handled, contact:

**Vitality Connect (Pty) Ltd**

Email: [privacy@vitalityconnect.co.za](mailto:privacy@vitalityconnect.co.za)

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