Discovery

Privacy Webinar

Presenters

Larry Borowitz	Chairperson | Discovery Health POPIA Steercom
Pieter van der Walt	Group Information Governance and Privacy Officer
Belinda E Ellse	Senior Compliance Guidance Officer
Angie Stavrinos	Business Analyst

Executive Summary

The **pace of adoption** of privacy regulations across the globe accelerated through 2018 into 2021

Regulators have evolved to adapt with the notable **increase in data subject complaints**, data privacy breaches and an increased awareness by data subjects of their rights

Since the enactment of POPIA in 2020, the Discovery Privacy team has **stepped into high gear** to implement various initiatives to comply and align with requirements

These initiatives involve **internal processes** as well as **outbound engagements** with Discovery's clients, intermediaries and external partners

This affects **all functional areas** within the Discovery Group, both locally and internationally

The privacy team would like to ensure that the Employer community is aware of

- **upcoming changes**
- how to **access and use** new privacy solutions
- **practical** implications

Reasons to care about Privacy

DISCOVERY VALUE

Customer, customer, customer

Integrity, honesty and fairness

DESCRIPTION

We are obsessed with our customers and their experience of us because we **empathise** as though their problems are our own and recognise the **impact** of our actions on the people we serve.

We ensure we contrast the complexity of the organisation with simple, old-fashioned values of **doing the right thing**.
We are truthful in our interactions and transparent in all our dealings; and ensure that every single rule and policy meets the highest **ethical standards**.

POPIA role players

Identifiable person/juristic entity

A **Responsible party** is any public or private body or person that determines the purpose of and means of processing of PI

An **Operator** is any person or party that processes PI <u>for</u> a responsible party in terms of a contract or mandate

Who/ Whom? Data Subject (DS)

Responsible Party (RP)

Example: Employer

Operator
For & under direct authority of the RP
Example: Discovery Health

Processing means ANY **activity** relating to PI – Create, collect, use, store, retrieve, retain, destroy.

Any personal information (PI) of a <u>Person</u> (natural) or <u>Entity</u> (juristic) to **whom** it relates, e.g.

- Employee, customer, member
- Shareholder
- Vendor, Supplier
- Prospect

<u>and</u> Special Personal Information (SPI) – that is PI relating to

- children (i.e. under the age of 18); religious beliefs, race, trade union membership, health or sex life, biometrics and criminal offences.

Activities

- Framework
- Confidentiality classification
- Retention of records
- Access control
- Processing documentation (PAIA)

Scope

- All records to be considered (digital & analogue)

Conditions for lawful processing

8

The responsible party must:

1. Accountability (S8)
2. Limit processing (S9-12)
3. Specify the purpose (why?) (S13-14)
4. Limit further processing (S15)
5. Ensure quality information (S16)
6. Openness (S17-18)
7. Secure integrity & safeguards (S19-22)
8. Allow data subject participation (S23-25)

Extra conditions

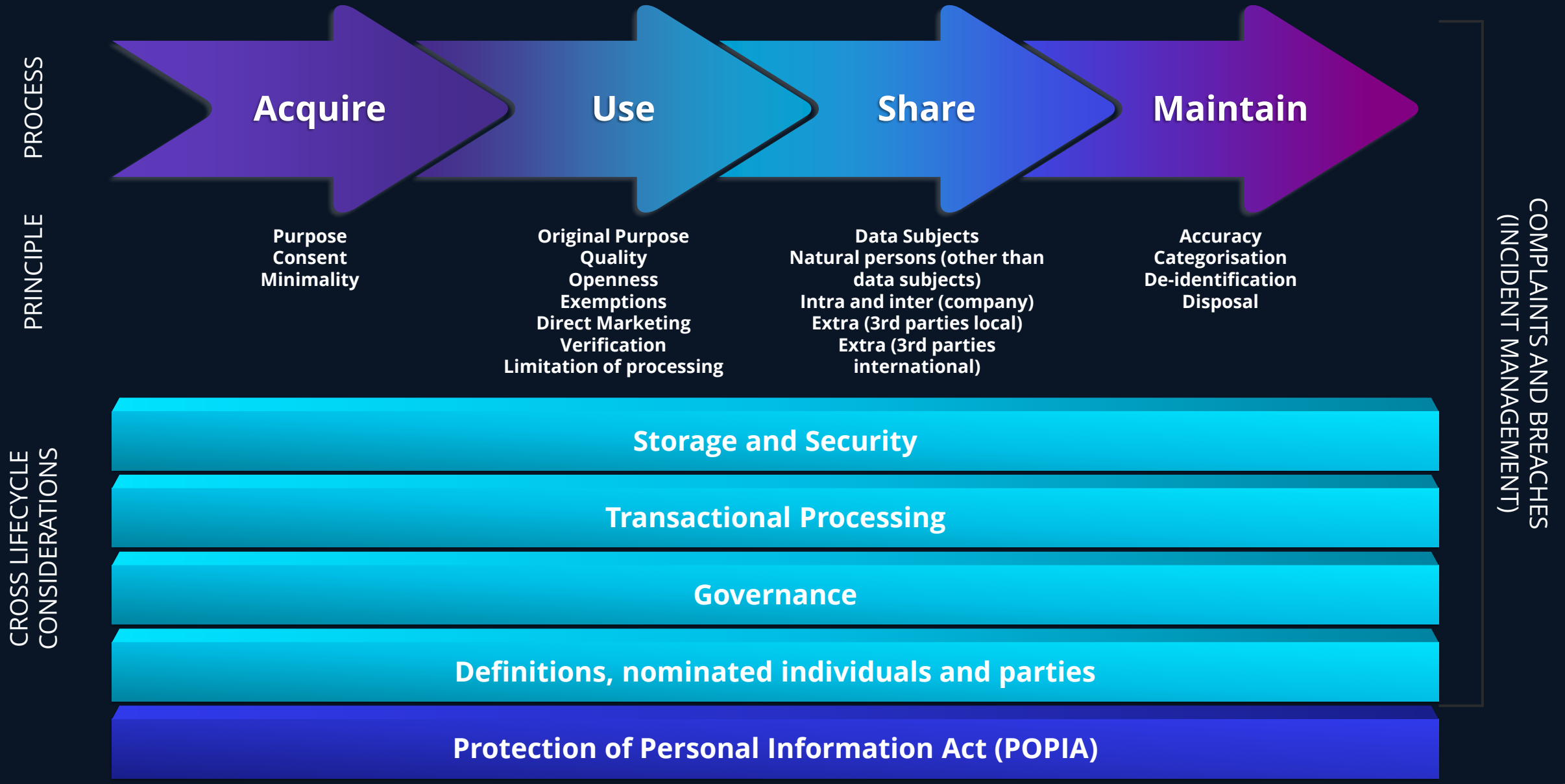
- Direct marketing (S69) & Directories (S70)
- Automated decision making (S71)
- Transfers outside South Africa (S72)

Not in isolation

Information Officer (or Deputy IO) - the head of a private or public body or appointments

Information Regulator

Discovery Health Privacy Framework | DH and Schemes Administered



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What is changing?

Pieter Van Der Walt
Group Information Governance and Privacy Officer

What is different now that POPIA is in place?

OPENNESS

Clearly defined reason provided to clients for collecting information

MINIMISE

Collect only what you need

SPECIAL PERSONAL INFORMATION

Extra protection for special personal information and children

SECURITY AND STORAGE

Reasonable measures to protect information and data to be deleted when no longer required

DIRECT MARKETING

Consent required

TRANSBORDER

Send to only where personal information is protected

REGULATORY ENVIRONMENT

Single Regulator with enhanced oversight

ENFORCEMENT AND RIGHTS

Legal consequences in case of breach and enhanced rights to individuals

CULTURE OF PRIVACY AND TRUST

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How is it changing?

Belinda E Ellse
Senior Compliance Guidance Officer

Key principles in Discovery's implementation Journey

PRIORITISED

- Privacy programme initiatives are prioritized towards 30 June 2021 according to **importance and urgency**
- The Privacy journey will continue after 30 June with various **enhancement phases**

CUSTOMISED

- Every Product House has a **unique** implementation journey
- This will result in a **staggered approach** within each area and across Discovery
- This approach ensures Discovery is **prudent** and applies **continuous improvement** through implementation

SUPPORTED

- **Employers** will be informed via the website, newsletters, emails, SMS as well as your Corporate Health Manager (CHM), Business Consultant (BC) or Health Liaison Manager (HLM) as changes go live

What will change in the way we communicate personal information to Employers?

Organisational measures: such as making sure we use the right email addresses when sending information via email (no typos or incorrect addresses)

Requirements to communicate securely

1

Having the **correct contact information** on our system. For example

- Email addresses
- Cellphone number

2

Making sure that **explicit relationships or linkages** evident, where applicable. For example:

- Work pools

3

Providing **access** to the Employer Zone (EZ)

What will change in the way we communicate personal information to Employers?

Technical measures such as:

PDF ENCRYPTION

Emails that contain personally identifiable information (like a cellphone number or ID number) will be sent as an **encrypted attachment**. This means that our clients will require a **password** to open the attachment to view the communication.

SECURE INBOX

Some communication will be delivered to a SECURE inbox, which will store all important Discovery communication. This inbox is accessible to members/ intermediaries/ Employers via the **Discovery website and mobile app**, after secure login.

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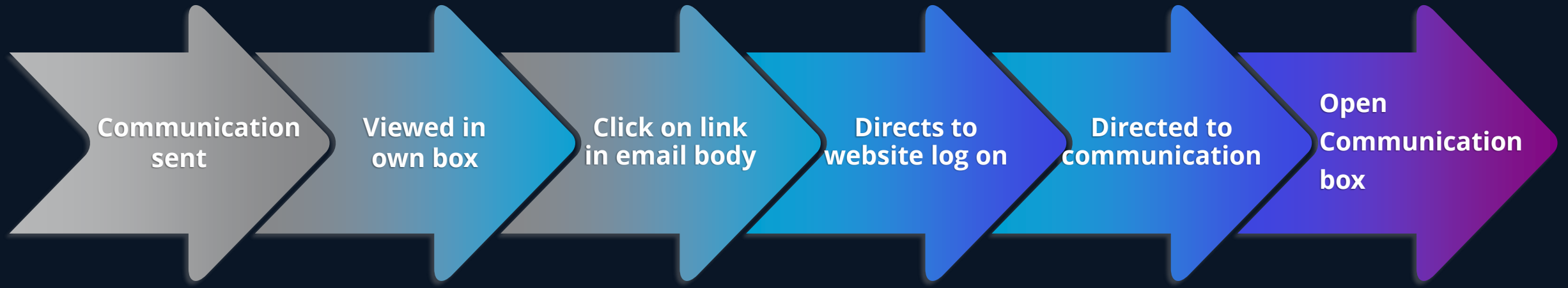
Secure Inbox Demo

Angie Stavrinos
Business Analyst

Process to access Secure Inbox documents



Sent to e-mail of client and employer or work pool on record

E-mail with PDF encrypted for client document and links

Link directs to communication

Note: Separate links for Employer and intermediary

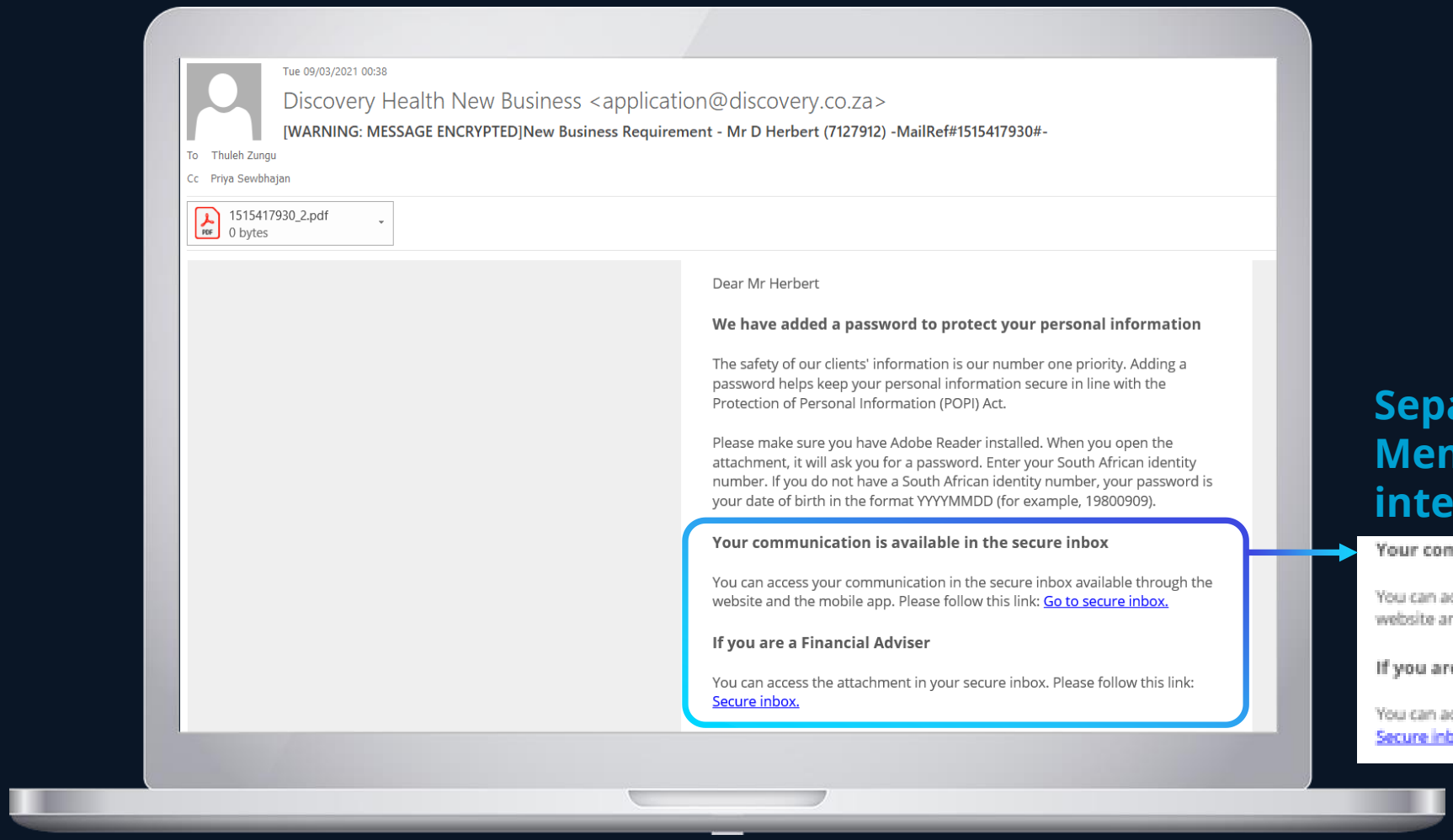
Normal log on credentials to be used

Link navigates directly to Secure Inbox

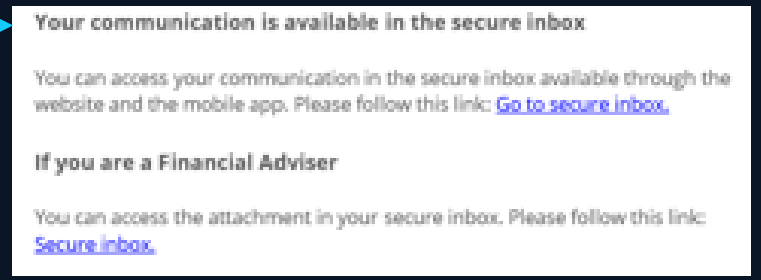
Note: Employers navigate to “Envelope” icon on top right of the landing page under “My Details”

PDF document (unencrypted) listed in Secure Inbox

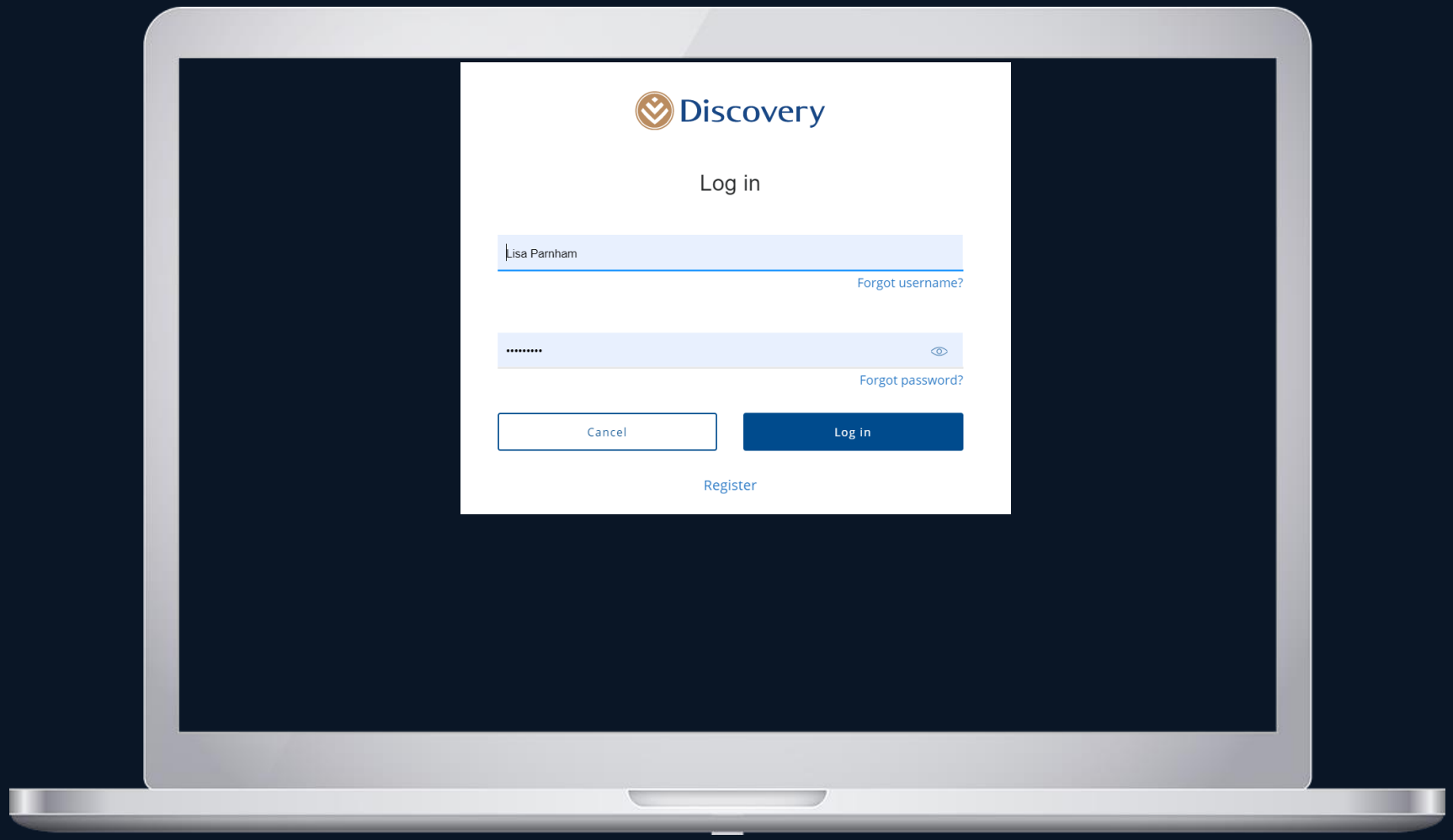
Generic e-mail



Separate links for Member/Employers and intermediaries



Discovery Digital Identity (DDID) login



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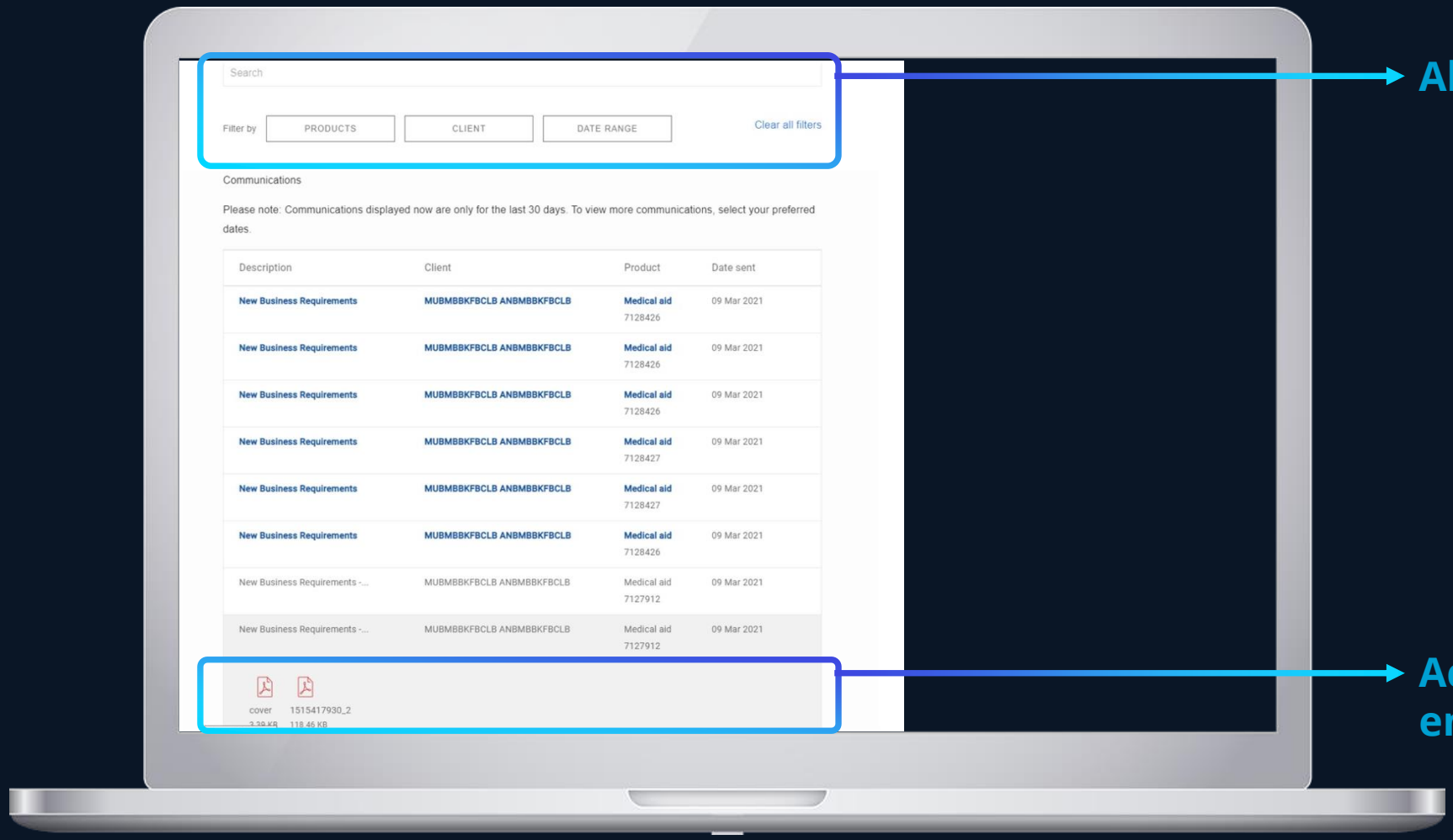

Ability to filter and search

Access to PDF (no encryption)

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Conclusion

Aba Etsiah
Senior Functional Head: Field Force Operations

Secure Communication Timelines

HIGH LEVEL TIMELINES 2021

	JUNE	JULY	AUGUST+
Employers	★ Employer Comms (17th) ★ Privacy Webinar (24th) ★ Secure Inbox go live (30th)	★ Employer Newsletter (1st)	Staggered go live dates per Product House Continued engagement

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Thank you

Q&A Session