

# Privacy and Data Protection Policy

POPIA - Protection of Personal Information Act 4 of 2013

INNOVATA PHARMACEUTICALS (PTY) LTD

Registration Number: 2013/093943/07 | Version 1.6 | Final -23 July 2026

## 1. Introduction

This Privacy and Data Protection Policy ("Policy") describes how Innovata Pharmaceuticals (Pty) Ltd (Registration Number: 2013/093943/07) ("Innovata", "we", "us", "our") collects, uses, stores, and protects personal information in connection with its operations as a pharmaceutical manufacturer and distributor, and through the use of its website at <https://innovata.co.za>.

This Policy is issued in terms of section 18 of POPIA and applies to all personal information processed by Innovata as a responsible party. Innovata does not sell personal information to third parties.

## 2. Definitions

- "Data Subject" An identified or identifiable natural person, and where applicable under POPIA, an identifiable existing juristic person, to whom personal information relates.
- "Information Officer" The person designated by Innovata in terms of POPIA to ensure compliance with POPIA and to handle PAIA requests. See Section 3.
- "Personal Information" Information relating to an identifiable natural or juristic person, as defined in section 1 of POPIA, including names, contact details, identification numbers, financial information, and health information.
- "Processing" Any operation performed on personal information, including collection, recording, storage, use, disclosure, or destruction.
- "Responsible Party" The entity that determines the purpose and means of processing personal information. Innovata is the responsible party for personal information it processes.
- "Special Personal Information" A category of personal information subject to stricter processing conditions under POPIA, including health information, which is central to Innovata's pharmacovigilance activities.
- "Website" The Innovata website accessible at <https://innovata.co.za> and all associated pages and content.

## 3. The Information Officer

|                                   |                                                                         |
|-----------------------------------|-------------------------------------------------------------------------|
| <b>Information Officer</b>        | Grace Job                                                               |
| <b>Email</b>                      | <a href="mailto:popia@innovata.co.za">popia@innovata.co.za</a>          |
| <b>Deputy Information Officer</b> | Hadiyo Mathoka                                                          |
| <b>Legal documents</b>            | <a href="https://innovata.co.za/legal">https://innovata.co.za/legal</a> |

## 4. What Personal Information We Collect

| Category                 | Personal information                                                                                               |
|--------------------------|--------------------------------------------------------------------------------------------------------------------|
| Healthcare professionals | Names, practice details, contact details, and records of medical information requests and professional engagement. |

### Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: [grace@innovata.co.za](mailto:grace@innovata.co.za)

[www.innovata.co.za](http://www.innovata.co.za)

|                                          |                                                                                                                                                                                                        |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Patients and reporters of adverse events | Where a suspected adverse event, side effect, or product complaint is reported, health information relating to the affected individual, which may constitute special personal information under POPIA. |
| Employees and contractors                | Full names, identity numbers, contact details, employment history, banking details, tax information, payroll data, and performance records.                                                            |
| Clients and distribution partners        | Names, business contact details, company registration details, and records of communications and agreements.                                                                                           |
| Website visitors                         | IP addresses, browser type, device type, pages visited, and cookie identifiers. See Section 10.                                                                                                        |
| Contact form and enquiry submitters      | Name, email address, company name, and the content of the enquiry submitted via the Website.                                                                                                           |

Innovata does not knowingly collect personal information from children under the age of 18 without verifiable parental or guardian consent.

## 5. How We Collect Personal Information

- Directly from data subjects when they contact us, submit an enquiry via the Website, request medical information, report an adverse event, or communicate with us by email, phone, or in person.
- From healthcare professionals and patients in the course of pharmacovigilance and medical information activities.
- Automatically through the Website via cookies, server logs, and analytics tools. See Section 10.
- From publicly available sources, such as company registers and professional directories, in connection with business development activities.
- From regulators, contracted manufacturers, and distributors, where they are authorised to share that information with us.

## 6. Purposes of Processing and Lawful Basis

| Purpose                                | Description                                                                                                | Lawful basis                                 |
|----------------------------------------|------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Pharmacovigilance and drug safety      | Recording, investigating, and reporting adverse events and product safety concerns to SAHPRA.              | Compliance with a legal obligation           |
| Medical information and HCP engagement | Responding to medical information requests from healthcare professionals.                                  | Legitimate interest; legal obligation        |
| Regulatory submissions                 | Preparing and lodging product registration and regulatory submissions with SAHPRA.                         | Legal obligation                             |
| Sales and marketing                    | Engaging healthcare professionals and distribution partners in accordance with applicable marketing codes. | Legitimate interest; consent                 |
| Distribution and supply                | Managing distributor, pharmacy, and hospital supply relationships.                                         | Contract performance                         |
| Employee administration                | Managing employment relationships, payroll, and HR processes.                                              | Contract performance; legal obligation       |
| Legal and regulatory compliance        | Meeting obligations under SARS, CIPC, SAHPRA, POPIA, PAIA, and other applicable legislation.               | Legal obligation                             |
| Website analytics                      | Understanding how visitors use the Website to improve content.                                             | Legitimate interest (with opt-out available) |

### Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: [grace@innovata.co.za](mailto:grace@innovata.co.za)

[www.innovata.co.za](http://www.innovata.co.za)

## 7. Special Personal Information and Pharmacovigilance

In the ordinary course of its business as a pharmaceutical company, Innovata processes health information relating to patients and other individuals in connection with pharmacovigilance, adverse event reporting, and medical information activities. Health information is special personal information under POPIA and is subject to stricter processing conditions.

Innovata processes this special personal information on the basis that it is necessary for compliance with an obligation of international public law, or is required by law, specifically Innovata's pharmacovigilance obligations under the Medicines and Related Substances Control Act 101 of 1965 and applicable SAHPRA guidelines. Access to pharmacovigilance and adverse event records is restricted to personnel who require it to perform their pharmacovigilance function, and these records are classified as Restricted under Innovata's internal data classification scheme.

Where a patient or member of the public voluntarily discloses their own health information when reporting a suspected adverse event, that disclosure is treated as necessary for Innovata to meet its regulatory reporting obligations and is processed strictly for that purpose.

## 8. Disclosure of Personal Information

We do not sell, rent, or trade personal information. We may share personal information with the following categories of recipients, subject to confidentiality and data processing obligations:

- SAHPRA and other regulatory or government authorities, where required by law, including in connection with pharmacovigilance reporting.
- Contracted manufacturers and distributors involved in the production and supply of Innovata products.
- Cloud and SaaS platform providers used in service delivery (including Microsoft 365 and the Company's secure email gateway).
- Third-party vendors and subcontractors engaged on specific projects, under written confidentiality obligations.
- Accounting, payroll, tax, and legal professional service providers, on a need-to-know basis.
- Financial institutions and payment processors.
- Potential acquirers or investors in the event of a merger, acquisition, or business sale, subject to appropriate confidentiality protections.

## 9. Transborder Flows of Personal Information

Certain cloud platforms and service providers used by Innovata, including its Microsoft 365 environment, may process personal information outside the Republic of South Africa. Where such transfers occur, we ensure that the recipient provides an adequate level of protection substantially equivalent to POPIA, that a written data processing agreement is in place, and that the transfer is otherwise permitted under POPIA section 72.

## 10. Cookies and Website Tracking

### 10.1 What cookies are

Cookies are small text files placed on your device when you visit the Website. Full detail is set out in the Cookie Policy (Annexure E).

### **Innovata Pharmaceuticals (Pty) Ltd**

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: [grace@innovata.co.za](mailto:grace@innovata.co.za)

[www.innovata.co.za](http://www.innovata.co.za)

## 10.2 Managing cookies

You can control and delete cookies through your browser settings. Consent for non-essential cookies may be withdrawn at any time.

## 11. Data Security

- Encryption of personal information in transit using TLS and at rest where technically feasible.
- Role-based access controls limiting access to personal information, including pharmacovigilance records, to authorised personnel.
- Multi-factor authentication on all systems that process personal or regulated information.
- Continuous monitoring and alerting on Company systems for security anomalies.
- Vendor due diligence and written data processing agreements with all sub-processors.
- Documented incident response and data breach notification procedures.

In the event of a data breach involving personal information that poses a risk to data subjects, Innovata will notify the Information Regulator and affected data subjects as soon as reasonably possible, in accordance with section 22 of POPIA.

## 12. Retention of Personal Information

We retain personal information only for as long as is necessary for the purpose for which it was collected or as required by law. Key periods include:

| Record type                                 | Retention period                                                                                                                                                 |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pharmacovigilance and adverse event records | For the period required by SAHPRA guidelines and Good Pharmacovigilance Practice - specific period to be confirmed with Regulatory Affairs / Quality Assurance.  |
| Regulatory submission and dossier records   | For the lifetime of the relevant product registration, and thereafter as required by SAHPRA.                                                                     |
| Client and distribution agreements          | 5 years after termination of the relationship.                                                                                                                   |
| Financial and accounting records            | 7 years (Income Tax Act and SARS requirements).                                                                                                                  |
| Employee records                            | 3 years after termination of employment.                                                                                                                         |
| Email correspondence                        | Retained within the Company's secure email archive for an extended period, as set out in the IT Master Policy, for regulatory and litigation-readiness purposes. |
| Website usage and analytics data            | 13 months.                                                                                                                                                       |

## 13. Your Rights as a Data Subject

- Right to be notified of the collection and processing of your personal information.
- Right of access: to request what personal information we hold about you.
- Right to correction or deletion: to request that inaccurate, irrelevant, excessive, outdated, or unlawfully obtained personal information be corrected or deleted.
- Right to object: to object to the processing of your personal information, including for direct marketing purposes.
- Right to complain: to lodge a complaint with the Information Regulator if you believe your personal information has been processed unlawfully.

### Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: [grace@innovata.co.za](mailto:grace@innovata.co.za)

[www.innovata.co.za](http://www.innovata.co.za)

To exercise any of the above rights, submit a written request to the Information Officer at [popia@innovata.co.za](mailto:popia@innovata.co.za). The Company will respond within 30 calendar days.

## 14. Links to Third-Party Websites

The Website may contain links to third-party websites. Innovata is not responsible for the privacy practices or content of those websites.

## 15. Updates to This Policy

This Policy is reviewed at least annually and updated whenever material changes occur. The current version is published on the Website. This Policy was first published in [month/year to be confirmed]. Current version: Version 1.0.

## 16. Contact Us

|                                           |                                                                                                  |
|-------------------------------------------|--------------------------------------------------------------------------------------------------|
| <b>Company</b>                            | Innovata Pharmaceuticals (Pty) Ltd                                                               |
| <b>Registration number</b>                | 2013/093943/07                                                                                   |
| <b>Website</b>                            | <a href="https://innovata.co.za">https://innovata.co.za</a>                                      |
| <b>Information Officer</b>                | Grace Job                                                                                        |
| <b>Data protection / POPIA enquiries</b>  | <a href="mailto:popia@innovata.co.za">popia@innovata.co.za</a>                                   |
| <b>General enquiries</b>                  | <a href="mailto:info@innovata.co.za">info@innovata.co.za</a>                                     |
| <b>Information Regulator (complaints)</b> | <a href="mailto:POPIAComplaints@infoeregulator.org.za">POPIAComplaints@infoeregulator.org.za</a> |

### **Innovata Pharmaceuticals (Pty) Ltd**

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax: +27 (0) 86 585 5115 | email: [grace@innovata.co.za](mailto:grace@innovata.co.za)

**[www.innovata.co.za](http://www.innovata.co.za)**