ALLIANCE HEALTH CHATBOT – DATA PROTECTION AND PRIVACY POLICY

Updated: 2025

1. INTRODUCTION

Alliance Health ("we", "us", "our") is committed to protecting your personal data and respecting your privacy when you interact with our **Alliance Health Chatbot** ("the Chatbot").

This policy explains how we collect, use, share, and protect your information in compliance with the Cybersecurity and Data Protection Act (CDPA) of Zimbabwe and international best practices such as the General Data Protection Regulation (GDPR).

Data Controller: Alliance Health

Address: 7 Fleetwood, Alexandra Park, Harare, Zimbabwe

Data Protection Officer: dpo@healthzim.com

2. INFORMATION WE COLLECT THROUGH THE CHATBOT

Personal Information

Depending on your interaction with the Chatbot, we may collect:

- **Identity Data:** Name, date of birth, gender, national ID/passport number, or policy number
- Contact Data: Phone number, email address (if shared during a chat)
- **Health Data:** Medical information or details related to your policy (treated as *sensitive personal data* with strict safeguards)
- Technical Data: Device type, IP address, time of interaction, and message logs
- Conversation Data: Chat transcripts and user inputs for service improvement and verification

How We Collect Information

- Directly from you: When you send messages, queries, or requests via the Chatbot
- **Automatically:** System-generated data like timestamps, device info, or network identifiers
- From internal systems: Linked customer profiles or previous interactions to provide accurate responses

3. HOW WE USE YOUR INFORMATION

We process your data under the following legal bases:

- Consent: When you agree to share information through the Chatbot
- Contract: To help deliver or manage your health or insurance services
- Legal Obligation: To comply with statutory or regulatory requirements
- Legitimate Interests: To improve service quality, security, and user experience
- Vital Interests: In emergencies or for urgent health-related support

Specific Uses Include:

- Assisting with policy or claims enquiries
- Processing requests for quotations, membership verification, or benefit information
- Sending claim or service updates (where relevant)
- Ensuring system security and fraud prevention
- Analysing chatbot usage to enhance communication and accuracy

4. YOUR RIGHTS

You have the following rights regarding your personal data collected via the Chatbot:

- Access: Request a copy of your data or conversation history
- Rectification: Correct inaccurate information shared through the Chatbot
- Erasure: Request deletion of your data ("right to be forgotten")
- Restriction: Ask us to limit how we use your data
- Portability: Request your data in a machine-readable format
- Object: Decline processing for marketing or automated decisions
- Withdraw Consent: Stop using the Chatbot or request that your information be deleted
- **Complain:** Lodge a complaint with **POTRAZ** (Postal and Telecommunications Regulatory Authority of Zimbabwe)

To exercise any of these rights, contact **dpo@healthzim.com**.

5. DATA PROTECTION MEASURES

We apply strong security controls to protect data shared via the Chatbot, including:

- Encryption: All messages and stored data are encrypted
- Access Controls: Limited access based on staff roles
- Network Security: Firewalls and intrusion detection systems
- Anonymization: Sensitive data is masked or pseudonymized where possible
- **Incident Response:** Data breaches are reported within 72 hours to authorities and affected individuals
- Regular Security Audits
- Secure Backups: Disaster recovery systems in place

6. DATA SHARING

We may share Chatbot data only when necessary, such as with:

- **Service Providers:** For claim processing or support (under strict confidentiality agreements)
- **Healthcare Partners:** Hospitals, clinics, or laboratories involved in your treatment (where applicable)
- **Regulators:** As required by Zimbabwean law
- Third Parties: Only with your explicit consent

We do not sell your personal data. All third-party partners must sign **Data Processing Agreements** to ensure compliance.

7. INTERNATIONAL TRANSFERS

If Chatbot data must be transmitted or stored outside Zimbabwe, we ensure:

- Your explicit consent is obtained
- Encryption and secure channels prevent unauthorized access
- **POTRAZ** is notified where applicable
- Standard contractual safeguards are in place
- Encryption keys remain stored within Zimbabwe

8. DATA RETENTION

Chatbot data is kept only for as long as necessary to:

- Support service delivery and ongoing communication
- Fulfil legal and regulatory obligations
- Improve system functionality

After the retention period, conversation logs and personal identifiers are **securely deleted or anonymized**.

9. CHATBOT ANALYTICS AND TRACKING

The Chatbot may use analytics to:

- Monitor performance and resolve technical issues
- Understand user needs and improve responses
- Ensure system security

We do **not use cookies**, but basic metadata (timestamps, session IDs) may be stored temporarily for performance and security.

10. MARKETING COMMUNICATIONS

With your consent, the Chatbot may send:

- Updates on products or services
- Event invitations
- Customer satisfaction surveys

You can **opt-out anytime** by replying "STOP", "UNSUBSCRIBE", or contacting **dpo@healthzim.com**.

11. CHILDREN'S PRIVACY

The Chatbot is not intended for individuals under 18 years without parental or guardian consent.

12. POLICY UPDATES

This policy may be updated periodically. The Chatbot will notify you of any significant changes, and the latest version will always reflect the "Updated" date.

13. CONTACT US

For questions, privacy concerns, or data access requests:

Email: dpo@healthzim.com

Website: https://alliancehealth.co.zw

Address: 7 Fleetwood, Alexandra Park, Harare, Zimbabwe

Regulatory Authority:

Postal and Telecommunications Regulatory Authority of Zimbabwe (**POTRAZ**)