

META4PLUS SOCIEDADE UNIPessoal LDA

PRIVACY POLICY

Effective Date: 09/09/2025

Protecting Your Privacy

META4PLUS SOCIEDADE UNIPessoal LDA is committed to protecting your personal data and upholding the highest standards of data protection. We primarily follow the **General Data Protection Regulation (EU GDPR)** and **Mozambique's Electronic Transactions Law (Law No. 3/2017)**. This Privacy Policy ("Policy") explains how we collect, use, store, disclose, and safeguard your Personal Information.

IMPORTANT DEFINITIONS

- **Data Controller:** An entity that determines the purposes and means of processing personal data.
- **Data Processor:** A third party that processes data on behalf of the Data Controller.
- **Data Subject:** A natural person whose personal data is being processed.
- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Special Categories of Personal Data:** This includes sensitive data such as health information, biometric data, and data revealing racial or ethnic origin, political opinions, religious beliefs, etc.
- **GDPR:** General Data Protection Regulation (EU 2016/679).
- **Law No. 3/2017:** Mozambique's Electronic Transactions Law governing digital processing, security, and transactions.

1. WHO WE ARE

META4PLUS SOCIEDADE UNIPessoal LDA is a Mozambican registered entity that provides integrated digital health systems and software-as-a-service (SaaS) solutions to healthcare institutions across Africa. Our key product areas include:

- Hospital Information Systems (HIS)
- Laboratory and Radiology Information Systems (LIS & RIS)
- PACS (Picture Archiving and Communication System)
- Intensive Care Unit Automation
- AI-based Cancer Diagnosis Support
- Digital Health Data Infrastructure

This Policy applies to all individuals whose data we process in our capacity as:

- A **Data Controller** (e.g., for our staff, service partners, and customer representatives), and
- A **Data Processor** (e.g., for patients and clinical users of our client institutions).

2. OUR ROLE IN DATA PROCESSING

As a company, we serve two main roles:

As a Data Controller

We are the controller for data related to:

- Our employees and job applicants
- Representatives and staff of partner organizations
- Vendors and suppliers
- Healthcare professionals using our systems

As a Data Processor

We process personal and health data on behalf of hospitals, clinics, and medical institutions who are the **Data Controllers**. Our systems store, transmit, and display medical data — but all such data is processed **only on instruction** of the relevant healthcare provider.

3. WHAT DATA WE COLLECT

As Data Controller, we may collect:

- **Basic Identifiers:** Name, gender, date of birth, nationality
- **Contact Information:** Email, phone number, work address
- **Employment Information:** CVs, roles, certifications, and evaluations
- **System Access Data:** User IDs, logins, session info, IP addresses
- **Payment Data:** Banking info, invoices, transaction records
- **Visual & Audio Data:** Video/audio recordings during training or support
- **Device/Usage Data:** Logs, cookies (see Cookie Policy), session analytics

As Data Processor, on behalf of our clients, we may handle:

- **Health Data:** Diagnoses, prescriptions, test results, ICU monitoring
- **Sensitive Medical History:** Notes, observations, allergies, referrals
- **Patient Identifiers:** MRN, name, birthdate, contact details
- **Clinical Operations Data:** Appointment scheduling, imaging files, pathology results

Such data is handled under contractual safeguards and strict access controls, only under instructions from the Data Controller.

4. HOW WE COLLECT YOUR DATA

We collect your data through the following methods:

- Directly from you (via job applications, contact forms, support tickets)
- Automatically from your use of our systems (e.g., software logs)
- From client hospitals or organizations who use our platforms
- Publicly available sources (e.g., verification, accreditation databases)
- Integrated third-party tools (e.g., online conferencing software)

5. HOW WE USE YOUR PERSONAL DATA

We use data in our role as a **Data Controller** to:

1. Manage employment and human resource operations
2. Provide support to our clients and their staff
3. Improve, maintain, and secure our software and infrastructure
4. Manage commercial and contractual relationships
5. Send service notifications, updates, and legally required notices

6. Meet our legal obligations under local and international law
We do **not** use Special Category data (such as health records) for our own purposes.

6. DISCLOSURE OF DATA TO THIRD PARTIES

We may share data under the following conditions:

General Disclosures

As Data Controller, we may disclose data to:

- Our internal staff and authorized contractors
- Service providers (e.g., IT support, cloud hosting, payroll)
- Legal and regulatory authorities when required
- Business partners, resellers, or affiliates
- With your consent or legal basis

Specific to Mozambique

We may share **Mozambique nationals' health data** to:

- **Mozambique Ministry of Health**, where reporting is mandated under Law No. 3/2022 and its Regulation Decree No. 65/2023 (e.g., for notifiable diseases, public health emergencies).
- Articles 6–9 assign reporting duties to hospitals and health providers.
- Our systems may act as a **channel**, but legal responsibility rests with the **Data Controller**.
- **Research and Ethics Authorities**, where required by **Law No. 6/2023**, subject to approvals under Articles 15–16 (research ethics, data access).

These disclosures are only made in accordance with contracts with the data controllers and applicable legal obligations.

7. INTERNATIONAL DATA TRANSFERS

As part of our IT infrastructure and support services, we may transfer data:

- To servers or partners in countries with appropriate safeguards
- Based on contracts using **Standard Contractual Clauses (SCCs)** or **Data Processing Agreements (DPAs)**
- In accordance with Article 49 of the GDPR in limited circumstances (e.g., for vital interest in critical care)

We also utilize safeguards required by Mozambique's Law No. 3/2017 regarding electronic transmission, authenticity, and integrity of information (see Articles 5–14).

8. DATA SUBJECT RIGHTS

You may have the following rights:

- Right to access your personal data
- Right to rectify inaccuracies
- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right to data portability
- Right to object to processing
- Right to withdraw consent (where applicable)

- Right to lodge a complaint (see Section 13)

For requests: **privacy@meta4plus.com**

These rights are based on the GDPR and apply primarily where the GDPR governs processing activities. However, your specific rights may vary depending on the privacy and data protection laws of your **country of residence** or the national law of the **data controller** (e.g., your healthcare provider).

9. DATA SECURITY

We maintain strict security protocols including:

- Access controls and authentication systems
- Secure development and deployment pipelines
- Encryption of data in transit and at rest
- Employee confidentiality contracts and training
- Regular audits and risk assessments

Our technical measures are in line with Mozambique's Law No. 3/2017 and GDPR Article 32.

10. RETENTION OF DATA

We retain personal data only for as long as necessary for:

- Providing services
- Meeting legal and contractual obligations
- Defending or establishing legal claims
- For health data, we follow the retention periods defined by the Data Controller or health authority policies

11. COOKIES & TRACKING

We use **technical cookies** necessary for site functionality. For more details, please see our separate [Cookie Policy].

12. LINKS TO OTHER SITES

Our services may contain links to external sites. We are not responsible for the privacy practices or content of those third-party websites. Please review their policies separately.

13. SUPERVISORY AUTHORITY & COMPLAINTS

If you believe your data protection rights have been violated, you may contact:

Mozambique

Instituto Nacional das Comunicações de Moçambique (INCM)

<https://www.incm.gov.mz>

International

Or contact your **national Data Protection Authority**, depending on your country of residence.

We recommend first contacting us at **privacy@meta4plus.com** to resolve any concern.

14. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. The latest version will always be published on our website and include the "Effective Date" at the top.

15. CONTACT US

If you have any questions or requests about this Privacy Policy or your personal data, please contact us:

- Email: **privacy@meta4plus.com**
- Address: AV. Vladimir Lenine nr35, Millennium Park, Maputo Maputo 174 Mozambique