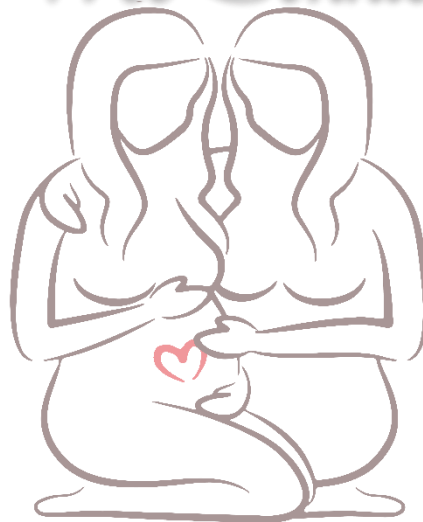


PDA Health Pty Ltd

*Wee Bonnie*



[Registration Number: 2016/]

This manual is prepared per section 51 of the Promotion of Access to Information Act 2 of 2000 and to address the requirements of the Protection of Personal Information Act 4 of 2014.

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## 1. Definitions

Client	Any natural or juristic person that receives or received services from the company.
Conditions for lawful processing	The conditions for the lawful processing of personal Information as fully set out in Chapter 3 of POPI and paragraph 12 of this manual.
Data Subject	The person to whom the personal information relates
Information officer	The individual who is identified in paragraph 3 of this manual
Manual	This Manual
PAIA	The Promotion of Access to Information Act 2 of 2000
Personal Information	Means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including, but not limited to – <ul style="list-style-type: none"> <li>a) Information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, color, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and the birth of the person.</li> <li>b) Information relating to the education or the medical, financial, criminal, or employment history of the person.</li> <li>c) Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or another particular assignment to the person.</li> <li>d) The biometric information of the person.</li> <li>e) The personal opinions, views, or preferences of the person.</li> <li>f) Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.</li> <li>g) The views or opinions of another individual of another person; and</li> <li>h) The name of a person, if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.</li> </ul>
Personnel	Any person who works for, or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Company, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers
POPI	The protection of Personal Information Act 4 of 2014
POPI Regulations	The regulation promulgated in terms of section 112(2) of POPI
Private Body	Means- <ul style="list-style-type: none"> <li>a. A natural person who carries or has carried on any trade, business, or profession, but only in such capacity;</li> <li>b. A partnership which carries or has carried on any trade, business or profession; or</li> <li>c. Any former or existing juristic person, but excludes a public body</li> </ul>
Processing	Means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including – <ul style="list-style-type: none"> <li>a) The collection, receipt or recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use;</li> </ul>

	b) Dissemination through transmission, distribution or making available in any other form; or c) Merging, linking as well as restriction, degrading, erasure, or destruction of information
SAHRC	The South African Human Rights commission

Any other terms not described herein will have the meaning as ascribed to it in terms of PAIA or POPI

## 2. Introduction

1. For the purpose of POPI and PAIA, the Company is defined as a private body. Under the Companies obligations in terms of POPI and PAIA, the Company has produced this manual.
2. This manual sets out all the information required by both PAIA and POPI.
3. This manual also deals with how requests are to be made in terms of PAIA.
4. This manual also establishes how compliance with POPI is to be achieved.

## 3. Contact Details

Business Name: PDA Health Pty Ltd

Registration Number: 2016/

Registered Office: 96 Lewis Dr, Amanzimtoti, 4126

Postal Address: PO Box 1210  
Amanzimtoti  
4125

Contact Number: 0319031715

Information Officer: S Beytell

Email Address: [training@profda.co.za](mailto:training@profda.co.za)

## 4. Guide of SAHRC

1. A guide to PAIA and how to access information in terms of PAIA has been published according to section 10 of PAIA.
2. You may also request a copy of the guide at:

### Information Regulator

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Telephone: (010) 023 5200

Website: [www.justice.gov.za](http://www.justice.gov.za)

Email: [paia.compliance.ir@justice.gov.za](mailto:paia.compliance.ir@justice.gov.za)

## 5. Latest Notices in Terms of Section 52(2) of PAIA

1. At this stage, no Notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA

## 6. Availability of Certain Records in terms of PAIA

1. The company holds and/or processes the following records for the purpose of PAIA and POPI.
2. The following records may be requested, however it should be noted that there is no guarantee that the request will be honored. Every request will be evaluated in terms of PAIA and any other applicable legislation.

### **Products and/or services:**

- All products and/or services are available freely on the company's website as set out above.

### **Human Resources:**

- Employment Contracts
- Employee Benefits
- Personnel Records or Correspondence
- Training Records
- Internal Policies
- Information on share options, share Incentives, bonus or profit-sharing agreements of each employee.
- Pension or Provident fund records

### **Legal**

- Agreements with clients
- Agreements with Suppliers
- Shareholder Agreements
- Partnership Agreements
- Licenses and Permits
- Power of Attorney
- Sale Agreement
- Lease agreements

### **Company Secretarial**

- Memorandum of Incorporation
- Secretarial Records
- Tradename registrations
- Trademark registrations
- Company Registration Records
- Statutory Registers
- Minutes of Shareholder's meetings
- Minutes of Director's meetings
- Register of Directors
- Share Certificates

### **Financial**

- Accounting Records
- Annual Reports
- Interim Reports
- Auditor Details and reports
- Tax Returns
- Insurance Records

### **Client**

- Client Database
- Credit Applications
- Correspondence with Clients
- Documentation prepared for clients
- Invoices, Receipts, Credit and Debit notes

### **Marketing**

- Published Marketing Materials

### **Miscellaneous:**

- Internal Correspondence
- Information Technology Records
- Trade Secrets
- Domain Name registrations
- Website Information
- Asset registers
- Title Deeds

## **7. Records Available in terms of other Legislation**

1. The Company may be in Possession of records in terms of the following Legislation as and when applicable
  - a. The Basic Conditions of Employment Act No. 57 of 1997
  - b. Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
  - c. Employment Equity Act No. 55 of 1998
  - d. The Labour Relations Act No. 66 of 1995
  - e. Pension Funds Act No. 24 of 1956
  - f. Skills Development Levies Act No. 9 of 1999
  - g. Unemployment Insurance Act No 63 of 2001
  - h. Value Added Tax Act No. 89 of 1991
  - i. Income Tax Act No. 58 of 1962
  - j. Occupation Health and Safety Act No. 85 of 1993

## 8. Request Process

1. An Individual who wishes to place a request must comply with all the procedures laid down in PAIA
2. The requester must complete ANNEXURE B, Which is attached hereto, and submit it to the Information Officer at the details specified above.
3. The prescribed form must be submitted to the information officer at the postal or physical address or email as is stated herein.
4. The prescribed form must be completed with enough particularity to enable the information officer to determine:
  - a. The record(s) requested;
  - b. The identity of the requestor;
  - c. What form of access is required;
  - d. The postal address or phone number of the requestor.
5. The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to exercise or protect the right.
6. The access request will be dealt with within 30 days from the date of the receipt unless the requestor has set out special grounds that satisfy the Information Officer that the request is dealt with sooner.
7. The period of 30 days may be extended by not more than 30 additional days, if the request is for a large quantity of information, or the request requires a search for information held at another office of the company and the information is not reasonably obtainable within the 30 days. The information officer will inform the requestor in writing should the extension be necessary.
8. The requester will be informed in writing whether access to the records has been granted or denied. If the requester requires a reason for the decision the request must be expressed in the prescribed form. The requestor must be further stated the particulars of the reasoning the requestor requires.
9. If the requestor has requested the records on another individual's behalf, the requestor must submit proof of the capacity the requestor submits the request in, to the satisfaction of the information officer.
10. Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the information officer for assistance.
11. An oral request can be made to the information officer should the requestor be unable to complete the form due to literacy or disability. The Information Officer will complete the form on behalf of the requestor and provide a copy of the form to the requestor.

## 9. Grounds for Refusal

1. The following are grounds upon which the Company may, subject to the exceptions in Chapter 4 of PAIA, refuse a request for access under Chapter 4 of PAIA.
  - a. Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal information would be unreasonable.
  - b. Mandatory protection of the Commercial information of a third party, if the record contains:
    - i. Trade secrets of that third party;
    - ii. Financial, commercial, scientific, or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party, and/or
    - iii. Information disclosed in accordance by a third party to the Company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;
  - c. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
  - d. Mandatory protection of the safety of individuals and the protection of property;
  - e. Mandatory protection of records that would be regarded as privileged in a legal proceeding;
  - f. Protection of the commercial information of the Company, which may include:
    - i. Trade Secrets;
    - ii. Financial/commercial, scientific, or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Company.
    - iii. The information which, if disclosed, could put the company at a disadvantage in contractual or other negotiations or prejudice the company in commercial competition, and/or
    - iv. Computer programs that are owned by the Company, and which are protected by copyright and intellectual property laws.
  - g. Research Information of the Company or a third party, if such disclosure would place the research or a researcher at a serious disadvantage; and
  - h. Requests for records that are frivolous or vexatious, or which involve an unreasonable diversion of resources.

## 10. Remedies should a request be refused

1. The company does not have an internal appeal procedure in light of a denial of a request, decision made by the information officer is final;
2. The requestor may under sections 56(3) and 78 of PAIA, apply to a court for relief within 180 days of notification of the decision for appropriate relief.



## 11. POPI

### 1. Conditions for lawful Processing

- a. POPI has 8 conditions for lawful processing
  - i. Accountability
  - ii. Processing limitations
  - iii. Purpose specifications
  - iv. Further processing limitation
  - v. Information quality
  - vi. Openness
  - vii. Security Safeguards
  - viii. Data subject participation
- b. The Company is involved with the following types of processing:
  - i. Collection
  - ii. Recording
  - iii. Organization
  - iv. Structuring
  - v. Storage
  - vi. Adaption or alteration
  - vii. Retrieval
  - viii. Consultation
  - ix. Use
  - x. Disclosure by transmission
  - xi. Dissemination or otherwise making available
  - xii. Alignment or combination
  - xiii. Restriction
  - xiv. Erasure
  - xv. Destruction
- c. The Company processes information for the following purposes:
  - i. To fulfill agreements concerning employees
  - ii. To provide services to clients per terms agreed to by the clients:
  - iii. To undertake its activities related to the provision of its services, such as
    - 1. To fulfill domestic legal, regulatory, and compliance requirements
    - 2. To verify the identity of customer representatives who contact the Company or may be contacted by the Company
    - 3. For risk assessment, information security management, statistical, trend analysis, and planning purposes;
    - 4. To monitor and record calls and electronic communications with the client for quality, training investigation, and fraud.
    - 5. To enforce or defend the company or the company's affiliates rights;
    - 6. To manage the Company's relationship with its clients, which may include providing information to its clients and its clients' affiliates about the Company's and the Company's affiliates' products and services
  - iv. The purposes related to any authorized disclosure made in terms of the agreement, law, or regulation.
  - v. Any additional purposes expressly authorized by the Company's client.

- vi. Any additional purposes as may be notified to the client or Data Subjects in any notice provided by the Company.
- 2. The Company processes personal information in the following Categories of Data Subjects:
  - a. Juristic Persons -
    - i. Corporate Clients
    - ii. Suppliers
  - b. Natural Person –
    - i. Individuals
    - ii. Staff
    - iii. Clients
    - iv. Suppliers
- 3. The Company processes the following categories of personal information:
  - a. Client Profile Information;
  - b. Bank Account Details;
  - c. Payment information;
  - d. Client Representatives;
  - e. Names;
  - f. Email addresses;
  - g. Telephone numbers;
  - h. Physical addresses;
  - i. Tax numbers;
  - j. Identity numbers;
  - k. Passport Numbers
- 4. Recipients of Personal Information
  - a. The Company, the Company's affiliates, their respective representatives
- 5. When making authorized disclosures or transfers of personal information in terms of Section 72 of POPI, personal information may be disclosed to recipients in countries that do not have the same level of protection for personal information as South Africa does.
- 6. The following Security measures are implemented by the Company
  - a. The Company implements numerous Security measures to protect the personal information that is stored electronically and physically.
    - i. The company ensures that appropriate security measures are taken and updates these measures regularly.
    - ii. The company has also implemented various policies for additional security for personal information stored both physically and electronically.
  - b. The personal information that is kept physically is protected as follows
    - i. Where physical records of data exist, such records will be stored in a secure area that can be "locked away" to avoid a breach of personal information.
    - ii. Such physical records will be locked away and secured when not in use.
- 7. The Company may share personal information with third parties and in certain instances may result in cross border flow of information. The personal information will always be subject to protection, not less than the protection afforded by the Protection of Personal Information Act No. 4 of 2013
- 8. Objection to the processing of personal information by a data subject.
  - a. Section 11(3) of POPI and regulation 2 of POPI regulations provides that a data subject may, at any time object to the processing of their personal information in the prescribed form attached to this Manual marked as "Annexure B"
- 9. Request for collection or deletion of personal information

- a. Section 24 of POPI and regulation 3 of the POPI regulations provide that a data subject may request for their personal information to be corrected and/or deleted in the prescribed form attached hereto as “Annexure C”.

## 12. Cost of Request

- Courier - R100.00
- Post Office - R50.00
- Email - R50.00
- Cloud Share/File Transfer - R50.00
- Paper Copy - R5.00/page
- Flash Drive Copy- R50.00

X

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Stefan Beytell  
Information Officer

# Annexure A

## Request for a Copy of the Guide

[Regulation 3]

To: Information Officer: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Full Names				
In My capacity As (mark with x)	Information Officer:		Other:	
Name of *public/private body (if applicable)				
Postal Address:				
Street Address:				
Email Address:				
Contact Numbers:	Tel (B):		Cell:	

Hereby request the following copy(ies) of the guide

Language (mark with X)		No. of Copies	Language (mark with X)		No. of Copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			isiXhosa	

Manner of Collection: (Mark with X):

Personal Collection	Postal Address	Electronic Communication (Please specify)

Signed At: \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_.

X

Requestor Signature

# Annexure B

## Request for Access to Records

(Regulation 7)

**NOTE:**

1. **Proof of Identification must be attached by the requestor.**
2. **If the request is made on behalf of another person, proof of such authorization must be attached to this form.**

To: The Information Officer:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Email: \_\_\_\_\_  
Telephone No. \_\_\_\_\_

Mark with an "X"

☐

The request is made in my own  
name

☐

The request is made on behalf of another person

Personal Information				
Full Names:				
Identity Number:				
Capacity in which request is made:				
Postal Address:				
Street Address:				
Email Address:				
Contact No.	Tel. B:		Cell:	
Full names of Person on behalf of whom the request is made:				
Identity Number:				
Postal Address:				
Street Address:				
Email Address:				
Contact Numbers:	Tel (B):		Cell:	

<b>Particulars of Record Requested</b>	
Provide full particulars of the record to which access is requested, including the reference numbers if that is known to you, to enable the record to be collected. (If the provided space is inadequate, please resume on a separate blank paper and attach it to this form. The requestor must sign all the additional pages)	
Description of Record or part of the Record:	
Reference Number if Available	
Any Further particulars of Record	
<b>Type Of Record (Mark Applicable with X)</b>	
Record is in written or printed form:	
The record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
The record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form.	
<b>Form of Access (Mark Applicable with X)</b>	
Printed Copy of Record (including copies of any virtual images, transcription, and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recording, computer-generated images, sketches, etc.)	
Transcription of a soundtrack (written or printed document)	
Copy or record of flash drive (including virtual images and soundtrack)	
Copy of record on a compact disk drive ( including virtual images and soundtracks)	
Copy of records saved on cloud server storage	
<b>Manner of Access (Mark Applicable with X)</b>	
Personal inspection of records at the registered address of public/private body (including listening to the recorded word, information which can be reproduced in sound, or information held on computer or in an electronic machine-readable form)	
Postal service to a postal address	
Postal services to a street address	
Courier service to a street address	
Email of Information (including soundtrack if possible)	
Cloud Share/File Transfer	

Preferred Language (Note that if the record is not available in the language requested, the Record will be provided in the language it exists in.)		
<b>Particulars of Right to be exercised or protected</b> (If the provided space is inadequate, please resume on a separate blank paper and attach it to this form. The requestor must sign all the additional pages)		
Indicate which right is to be exercised or protected		
Explain why the record is required to exercise or protect the right		
<b>Fees</b> a) A Request fee must be paid before the request will be considered b) You will be notified of the amount of the access fee to be paid. c) The fee that is payable for access to the record depends on the form in which access is required and the reasonable time required to search for and prepare the record. d) If you qualify for the exemption to pay any of the fees, please state the reason for the exemption		
Reason:		

You will be notified, in writing, as to whether your request has been approved or denied and if approved, the cost relating to your request. Please indicate the preferred method of communication.

Postal address	Electronic Communication

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

X

Signature of Requestor

**For Office Use Only:**

Reference Number:	
Request Received By:	
Date Received:	
Access Fee:	
Deposit (if Any)	

X

Signature of Information Officer

# Annexure C

## Change of Personal Information

### FORM 2

#### REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

#### REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

#### Request for:

<input type="checkbox"/>	Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
<input type="checkbox"/>	Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorized to retain the record of information.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity	
Number Residential, postal or business address:	Code (       )
Contact number(s):	



Fax number / E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/ Registered name of responsible party:	
Residential, postal, or business address:	Code (      )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTRUCTED/ DESTROYED</b>
<b>D</b>	<b>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</b> <b>(Please provide detailed reasons for the request</b>

Signed at ..... this ..... day of .....20.....

**X**

Signature of data subject/ designated person

# Annexure D

## Objection to the processing of Information

### FORM 1

#### OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

#### REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity	
Number Residential, postal or business address:	Code (      )
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal, or business address:	Code (      )

Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at ..... this ..... day of .....20.....

**X**

---

Signature of data subject/designated person