



# **CHRONOS MEDICAL (PTY) LTD PAIA MANUAL**

Prepared in terms of section 51 of the Promotion of Access  
to Information Act 2 of 2000 (as amended)

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## 1 Definitions

| Term                             | Definition                                                                                                                                                                                                                                                                                                                        |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CEO                              | Chief Executive Officer                                                                                                                                                                                                                                                                                                           |
| Client                           | Any natural or juristic person that received or receives services from the company                                                                                                                                                                                                                                                |
| Complainant                      | Any person who lodges a complaint with the Information Regulator                                                                                                                                                                                                                                                                  |
| Complaint                        | (a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act;<br>(b) A complaint referred to in section 76(1)(e) and 92(1) of the Act;<br>(c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator |
| Conditions for Lawful Processing | The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual                                                                                                                                                                                           |
| Data Subject                     | The person to whom Personal Information relates                                                                                                                                                                                                                                                                                   |
| Day                              | A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)                                                                                                |
| DIO                              | Deputy Information Officer                                                                                                                                                                                                                                                                                                        |
| Information Officer/IO           | The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA                                                                                                                                                                                                                            |
| Manual                           | This manual                                                                                                                                                                                                                                                                                                                       |
| Minister                         | Minister of Justice and Correctional Services                                                                                                                                                                                                                                                                                     |
| Office Hours                     | (a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays);<br>(b) For designated offices: Hours during which the offices operate                                                                                                                                                               |
| PAIA                             | The Promotion of Access to Information Act, No. 2 of 2000                                                                                                                                                                                                                                                                         |
| Personal Information             | Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers                                                                                                                |
| Personnel                        | Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors                                                                                                                  |
| POPI/POPIA                       | The Protection of Personal Information Act, No. 4 of 2013                                                                                                                                                                                                                                                                         |
| POPI Regulations                 | Regulations promulgated in terms of section 112(2) of POPI                                                                                                                                                                                                                                                                        |
| Private Body                     | (a) A natural person conducting business;<br>(b) A business partnership;<br>(c) A juristic person not being a public body                                                                                                                                                                                                         |

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| Term       | Definition                                                                                                              |
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| Processing | Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction |
| Regulator  | Information Regulator established in terms of POPIA                                                                     |
| Republic   | Republic of South Africa                                                                                                |
| Signature  | Any legally accepted form of signature, including electronic signature where applicable                                 |
| Writing    | As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)           |

## 2 Purpose of the PAIA Manual

This PAIA Manual is useful for the public to:

- 2.1 Check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 2.2 Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- 2.3 Know the description of the records of the body which are available in accordance with any other legislation.
- 2.4 Access all the relevant contact details of the IO and DIO who will assist the public with the records that they intend to access.
- 2.5 Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.
- 2.6 Know if the body will process personal information, the purpose of processing of personal information, and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.7 Know the recipients or categories of recipients to whom the personal information may be supplied.
- 2.8 Know if the body has planned to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.
- 2.9 Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

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### 3 Key Contact Details for Access to Information of the Chronos Medical (Pty) Ltd

#### 3.1 Information Officer

|                |                                                                          |
|----------------|--------------------------------------------------------------------------|
| Name           | Tristan Biajnath                                                         |
| Contact number | 076 442 7243                                                             |
| Email address  | <a href="mailto:popia@chonosmedical.co.za">popia@chonosmedical.co.za</a> |

#### 3.2 Deputy Information Officer

|                |                                                                          |
|----------------|--------------------------------------------------------------------------|
| Name           | Dean Twigg                                                               |
| Contact number | 082 076 7255                                                             |
| Email address  | <a href="mailto:dean@chronosmedical.co.za">dean@chronosmedical.co.za</a> |

|                |                                                                                  |
|----------------|----------------------------------------------------------------------------------|
| Name           | Angelika Anthea Kartusch                                                         |
| Contact number | 082 718 6717                                                                     |
| Email address  | <a href="mailto:accounts@chronosmedical.co.za">accounts@chronosmedical.co.za</a> |

#### 3.3 General contacts for access to information

|               |                                                                          |
|---------------|--------------------------------------------------------------------------|
| Email address | <a href="mailto:info@chronosmedical.co.za">info@chronosmedical.co.za</a> |
|---------------|--------------------------------------------------------------------------|

#### 3.4 National or head office

|                  |                                                                                     |
|------------------|-------------------------------------------------------------------------------------|
| Postal address   | N/A                                                                                 |
| Physical address | Fourways view office park , block C, Sunrise ,Blvd ,<br>Pineslopes ,AH Sandton 2194 |
| Contact number   | 010 017 1373                                                                        |
| Email            | <a href="mailto:info@chronosmedical.co.za">info@chronosmedical.co.za</a>            |
| Website          | <a href="http://www.chonosmedical.co.za">www.chonosmedical.co.za</a>                |

### 4 Guide on how to use PAIA and how to Obtain Access to the Guide

- 4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised guide on how to use PAIA ("guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

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4.2 The guide is available in each of the official languages and in braille.

4.3 The aforesaid guide contains the description of:

4.3.1 The objects of PAIA and POPIA;

4.3.2 The postal and street address, phone and fax number and, if available, email address of:

4.3.2.1 The IO of every public body, and

4.3.2.2 Every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA<sup>1</sup>;

4.3.3 The manner and form of a request for:

4.3.3.1 Access to a record of a public body contemplated in section 11<sup>2</sup>.

4.3.3.2 Access to a record of a private body contemplated in section 50<sup>3</sup>.

4.3.3.3 An internal appeal.

4.3.3.4 A complaint to the Regulator.

4.3.3.5 An application with a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.

4.3.4 The provisions of sections 14<sup>4</sup> and 51<sup>5</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.5 The provisions of sections 15<sup>6</sup> and 52<sup>7</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.6 The notices issued in terms of sections 22<sup>8</sup> and 54<sup>9</sup> regarding fees to be paid in relation to requests for access;

4.3.7 The regulations made in terms of section 92<sup>10</sup>;

4.3.8 The assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.9 The assistance available from the Regulator in terms of PAIA and POPIA; and

<sup>1</sup> Section 56(a) of POPIA - Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA

<sup>2</sup> Section 11 of PAIA - A requester must be given access to a record of a public body if the requester complies with all the procedural requirements in PAIA relating to a request for access to that record, and if access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>3</sup> Section 50 of PAIA - A requester must be given access to any record of a private body if:

(a) that record is required for the exercise or protection of any rights;

(b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

(c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 14 of PAIA - The Information Officer of a public body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

<sup>5</sup> Section 51 of PAIA - The Information Officer of a private body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

<sup>6</sup> Section 15 of PAIA - The Information Officer of a public body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

<sup>7</sup> Section 52 of PAIA - The head of a private body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

<sup>8</sup> Section 22 of PAIA - If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

<sup>9</sup> Section 54 of PAIA - If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

<sup>10</sup> Section 92(11) of PAIA - The Information Regulator must update and publish the guide referred to in subsection (1) at intervals of not more than two years.

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4.3.10 All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging.

4.4 Members of the public can inspect or make copies of the guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The guide can also be obtained:

4.5.1 Upon request to the IO.

4.5.2 From the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:

4.6.1 English.

4.6.2 Afrikaans.

4.6.3 Zulu.

## 5 Guide of Information Regulator

5.1 A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.

5.2 The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.

5.3 Should you wish to access the guide, you may request a copy from the IO by contacting him/her using the details specified above.

5.4 You may also inspect the guide at the company's offices during ordinary working hours.

5.5 You may also request a copy of the guide from the Information Regulator at the following details:

|                |                                                                                        |
|----------------|----------------------------------------------------------------------------------------|
| Postal address | P O Box 31533, Braamfontein, Johannesburg, 2017                                        |
| Contact number | +27 (10) 023-5200                                                                      |
| Website        | <a href="http://www.inforegulator.org.za">www.inforegulator.org.za</a>                 |
| Email          | <a href="mailto:PAIACompliance.IR@justice.gov.za">PAIACompliance.IR@justice.gov.za</a> |

## 6 Latest Notices in terms of Section 52(2) of PAIA

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.

## 7 Availability of Certain Records in terms of PAIA

7.1 Categories of records of the Chronos Medical (Pty) Ltd which are available without a person having to request access:

|                                                                                   |                        |                  |            |
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| Category of Records                                     | Types of the Record                                                                                                    | Available on Website | Available on Request |
|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|----------------------|----------------------|
| PAIA Manual                                             | Company's current PAIA Manual                                                                                          | X                    | X                    |
| Company overview                                        | Practice profile, healthcare services offered, practitioner details, areas of specialisation, contact details          | X                    | X                    |
| Policies (public-facing)                                | Privacy Policy, Data Protection Policy, Website Cookies Policy, Cybersecurity Statement                                | X                    | X                    |
| Patient Information                                     | Patient information leaflets, treatment guidelines, patient rights and responsibilities, admission procedures          | x                    | x                    |
| Legal disclosures                                       | Terms and Conditions of treatment, consent forms (general templates), disclaimers, telemedicine terms (if applicable)  | X                    | X                    |
| News and announcements                                  | Health awareness updates, practice notices, new services, blog articles, patient education content                     | X                    | X                    |
| Public marketing materials                              | Brochures, wellness programmes, healthcare campaigns, service guides, presentations                                    | X                    | X                    |
| POPIA and PAIA awareness training certificates          | Staff training records, attendance registers for POPIA and PAIA awareness (non-confidential summaries)                 | X                    | X                    |
| Supplier / Service Provider Information (if applicable) | Supplier registration forms, B-BBEE certificates, procurement information (public-facing documents only)               | X                    | X                    |
| Contact information for IO                              | Name, designation, email address, and contact number of the Information Officer                                        | X                    | X                    |
| Professional and Regulatory Compliance                  | HPCSA registration confirmation (where applicable), practice licences, compliance statements, POPIA compliance notices | X                    | X                    |
| Technology and Compliance Certifications                | ISO certifications (if applicable), PCI-DSS compliance statements, POPIA & PAIA awareness certificates                 | X                    | X                    |
| Health Promotion & Community Initiatives                | Community outreach programmes, wellness initiatives, public health campaigns, CSR activities                           | X                    | X                    |

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7.2 Description of the records/subjects of Chronos Medical (Pty) Ltd which are available in accordance with any other legislation:

| Category of Records                                                                                                             | Applicable Legislation                                               | Department/<br>Subject Area    |
|---------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|--------------------------------|
| Memorandum of Incorporation, company registration documents, board resolutions, director records                                | Companies Act, 71 of 2008                                            | Corporate Governance           |
| Employment contracts, staff records, payroll information, leave records                                                         | Basic Conditions of Employment Act, 75 of 1997                       | Human Resources (HR)           |
| Disciplinary records, grievance procedures, CCMA documentation                                                                  | Labour Relations Act, 66 of 1995                                     | HR                             |
| Employment Equity (EE) plans, reports, and committee records                                                                    | Employment Equity Act, 55 of 1998                                    | HR                             |
| Tax returns, IRP5 certificates, PAYE submissions, SARS correspondence                                                           | Income Tax Act, 58 of 1962                                           | Finance                        |
| Workplace Skills Plans (WSPs), training records, CPD (Continuous Professional Development) records for healthcare professionals | Skills Development Act, 97 of 1998                                   | Training and Development       |
| UIF contribution records and declarations                                                                                       | Unemployment Insurance Act, 63 of 2001                               | HR                             |
| Health and safety records, incident reports, infection control records, risk assessments                                        | Occupational Health and Safety Act, 85 of 1993                       | Occupational Health and Safety |
| VAT returns, financial statements, billing records, medical aid claims submissions                                              | Value-Added Tax Act, 89 of 1991                                      | Finance                        |
| Injury on duty records, Compensation Fund claims                                                                                | Compensation for Occupational Injuries and Diseases Act, 130 of 1993 | Occupational Health and Safety |
| Patient medical records, clinical notes, diagnostic results, treatment records                                                  | National Health Act, 61 of 2003; HPCSA Ethical Rules                 | Clinical / Medical Services    |
| B-BBEE certificates, ownership and supplier development records                                                                 | Broad-Based Black Economic Empowerment Act, 53 of 2003               | Supply Chain Management (SCM)  |
| Service agreements with third-party healthcare providers, referral agreements                                                   | Consumer Protection Act, 68 of 2008                                  | Client Services/ Marketing     |

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| Category of Records                                                                                        | Applicable Legislation                                            | Department/<br>Subject Area |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|-----------------------------|
| Data subject consent forms, privacy notices, PAIA Manual, operator agreements, processing activity records | Protection of Personal Information Act, 4 of 2013                 | Legal and Compliance        |
| Source code repositories, software development logs, version control history                               | Copyright Act, 98 of 1978; Intellectual Property Laws             | IT / Software Development   |
| Electronic health records, system logs, telemedicine records                                               | Electronic Communications and Transactions Act, 25 of 2002; POPIA | IT / Operations             |
| PAIA Manual, access request logs, training records                                                         | Promotion of Access to Information Act, 2 of 2000                 | Legal and Compliance        |
| Know Your Customer (KYC) documents, client identification and verification records                         | Financial Intelligence Centre Act, 38 of 2001 (if applicable)     | Client Services/<br>Finance |
| Electronic communications policies, e-signature consents, website terms and conditions                     | Electronic Communications and Transactions Act, 25 of 2002        | Information Technology (IT) |
| Record retention schedules, archiving and secure disposal logs                                             | National Archives and Records Service Act, 43 of 1996             | Records Management          |

*\*Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.*

7.3 The company holds and/or processes the following records for the purposes of PAIA and POPIA:

7.3.1 PAIA: PAIA Manual; PAIA guides; PAIA records; PAIA submission records; awareness training.

7.3.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.

7.3.3 Further information which may be made available upon request.

7.4 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

## 8 Request Process

8.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.

|                                                                                   |                        |                  |            |
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- 8.2 The requester must complete Form 02 of PAIA Forms (Request for Access to Record) herein, is attached hereto and submit it to the IO at the details specified herein.
- 8.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.
- 8.4 The prescribed form must be completed with enough particularity to enable the IO to determine:
- 8.4.1 The record(s) requested;
  - 8.4.2 The identity of the requestor;
  - 8.4.3 What form of access is required; and
  - 8.4.4 The postal address or fax number of the requestor.
- 8.5 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 be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.
- 8.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the IO that the request be dealt with sooner.
- 8.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held at another office of the company and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requestor in writing should an extension be necessary.
- 8.8 The IO must communicate a response to the request for access using Form 03 of PAIA Forms (Outcome of Request and of Fees Payable) herein. This communication shall inform the requestor of:
- 8.8.1 The decision; and
  - 8.8.2 Fees payable.
- 8.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.
- 8.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the IO for assistance.
- 8.11 An oral request can be made to the IO should the requestor be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requestor and provide a copy of the form to the requestor.
- 8.12 Form 2 of POPIA Forms (Request for Correction or Deletion) herein, is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading

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personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data.

- 8.13 Form 3 of POPIA Forms (Application for the Issue of a Code of Conduct) herein is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing.
- 8.14 Form 4 of POPIA Forms (Request for Consent – Direct Marketing) herein enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to.
- 8.15 Form 5 of POPIA Forms (Complaint Regarding Interference with Personal Information) herein allows a data subject or complainant to submit a complaint to the IR concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations.

## 9 Grounds for Refusal

The following are grounds upon which the company may, subject to the exceptions in chapter 4 of PAIA, refuse a request for access in accordance with chapter 4 of PAIA:

- 9.1 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.
- 9.2 Mandatory protection of the commercial information of a third party, if the records contain:
- 9.2.1 Trade secrets of that third party;
  - 9.2.2 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
  - 9.2.3 Information disclosed in confidence 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.
- 9.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 9.4 Mandatory protection of the safety of individuals and the protection of property.
- 9.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.
- 9.6 Protection of the commercial information of the company, which may include:
- 9.6.1 Trade secrets;

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- 9.6.2 Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the company;
- 9.6.3 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
- 9.6.4 Computer programs which are owned by the company, and which are protected by copyright and intellectual property laws.

- 9.7 Research information of the company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.
- 9.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

## 10 Remedies Should a Request be Refused

- 10.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.
- 10.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

## 11 Fees

The following fees shall be payable upon request by a requestor:

| Details                                                                          | Fee                                  |
|----------------------------------------------------------------------------------|--------------------------------------|
| Request fee (payable on every request)                                           | R140.00 once-off                     |
| Photocopy of an A4 page or part thereof                                          | R2.00 per page                       |
| Printed copy of an A4 page or part thereof                                       | R2.00 per page                       |
| Hard copy on flash drive (flash drive to be provided by requestor)               | R40.00 once-off                      |
| Hard copy on a compact disc (compact disc to be provided by requestor)           | R40.00 once-off                      |
| Hard copy on a compact disc (compact disc to be provided by the company)         | R60.00 once-off                      |
| Transcription of visual images per A4 page                                       | As per quotation of service provider |
| Copy of visual images                                                            | As per quotation of service provider |
| Transcription of an audio record                                                 | R24.00 per A4 page                   |
| Copy of an audio record on flash drive (flash drive to be provided by requestor) | R40.00 once-off                      |
| Copy of an audio on a compact disc (compact disc to be provided by requestor)    | R40.00 once-off                      |

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| Details                                                                         | Fee                                                                                                                                                               |
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| Copy of an audio on a compact disc (compact disc to be provided by the company) | R60.00 once-off                                                                                                                                                   |
| Base/starting rate to search for and prepare the record for disclosure          | R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request) |
| Rate to search for and prepare the record for disclosure                        | R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)          |
| Postage, email or any other electronic transfer                                 | Actual expense, if any                                                                                                                                            |

## 12 Processing of Personal Information

### 12.1 Purpose of processing personal information:

- 12.1.1 To provide healthcare services, including medical consultations, diagnosis, treatment, patient care, and clinical support services;
- 12.1.2 To maintain accurate patient medical records, including clinical history, diagnoses, treatment plans, laboratory results, and healthcare outcomes in accordance with applicable healthcare legislation
- 12.1.3 To communicate with patients, their authorised representatives, and other healthcare professionals regarding appointments, treatment plans, referrals, results, and follow-up care;
- 12.1.4 To comply with legislative, regulatory, compliance, and risk requirements, including directives, sanctions, rules, voluntary and mandatory codes of conduct, industry standards, and reporting obligations;
- 12.1.5 To process medical aid claims, billing, payments, and related financial transactions, including issuing invoices, statements, and receipts.
- 12.1.6 To comply with applicable legislative, regulatory, ethical, and professional obligations, including requirements under healthcare laws, ethical rules, and reporting obligations to regulatory bodies;
- 12.1.7 To manage patient administration, including patient registration, appointment scheduling, record management, and practice operations
- 12.1.8 To respond to patient enquiries, complaints, queries, or service-related requests and to improve service delivery and patient experience;
- 12.1.9 To conduct clinical audits, quality assurance, risk management, and internal reviews to ensure the delivery of safe and effective healthcare services
- 12.1.10 To ensure the security, integrity, and confidentiality of personal information, including identity verification, access control, and fraud prevention;
- 12.1.11 To conduct statistical, research, and analytical activities, provided that such information is anonymised or de-identified where appropriate and in compliance with applicable laws;

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- 12.1.12 To facilitate telemedicine, digital health services, and electronic communication with patients, subject to appropriate safeguards
- 12.1.13 To manage relationships with service providers, operators, and third parties who support the Practice's operations, subject to appropriate confidentiality and data protection agreements;
- 12.1.14 To provide patient education, health awareness communication, and relevant healthcare updates, where consent has been obtained where required;
- 12.1.15 To maintain internal records relating to staff, contractors, and service providers for employment, operational, and compliance purposes;
- 12.1.16 To manage legal matters, including dispute resolution, litigation, insurance claims, and professional indemnity requirements;
- 12.1.17 To retain records in accordance with applicable retention periods prescribed by healthcare and other legislation;
- 12.1.18 To monitor and manage access to facilities and systems, including CCTV (if applicable), for safety and security purposes; and
- 12.1.19 For any other lawful and reasonable purpose related to the provision of healthcare services and the management of the Practice, in accordance with applicable data protection and healthcare laws.

12.2 Description of the categories of data subjects and of the information or categories of information relating thereto:

| Categories of Data Subjects                           | Personal Information that may be Processed                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Patients / Clients                                    | Full name, identity/passport number, date of birth, contact details (email, phone number), residential and postal address, medical aid details, medical scheme number, clinical history, diagnoses, treatment records, laboratory results, prescriptions, referral information, billing information, emergency contact details, and other health-related special personal information. |
| Next of Kin / Caregivers / Authorised Representatives | Full name, contact details, relationship to patient, communication records, authorisation documentation, and emergency contact information.                                                                                                                                                                                                                                            |
| Medical Aid Schemes / Insurers                        | Scheme details, membership numbers, authorisation records, claims information, billing records, treatment codes, and related correspondence.                                                                                                                                                                                                                                           |
| Healthcare Professionals / Referring Practitioners    | Name, practice number, contact details, professional registration details, referral notes, consultation reports, and correspondence relating to patient care.                                                                                                                                                                                                                          |
| Employees                                             | Full name, identity number, contact details, residential address, employment contracts, salary and banking details, tax information, qualifications, professional registration details, performance records, leave records, disciplinary records, and other HR-related information.                                                                                                    |

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| Job Applicants / Candidates                 | Curriculum Vitae, identity number, contact details, qualifications, employment history, references, background checks (where applicable and lawful), and interview records.     |
| Service Providers / Vendors                 | Company or individual name, registration and VAT numbers, banking details, contact information, contractual agreements, service level agreements, and compliance documentation. |
| Consultants / Independent Contractors       | Identity or registration details, contact information, banking and payment details, tax compliance information, contractual agreements, and service records.                    |
| Website Visitors and Digital Platform Users | IP addresses, cookies, device information, browsing behaviour, analytics data, and contact form submissions.                                                                    |
| Regulators and Statutory Bodies             | Registration information, compliance reports, audit documentation, statutory submissions, and legally required disclosures.                                                     |
| Shareholders / Directors (if applicable)    | Names, identity numbers, contact details, appointment records, shareholding information, and declarations of interest.                                                          |

### 13 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

| Category of Personal Information                                                             | Recipients or Categories of Recipients to whom the Personal Information may be Supplied                                                                                                    |
|----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Patient identity details (names, ID/passport numbers, contact details)                       | Department of Home Affairs (where required), South African Police Service (legal compliance), medical aid schemes, authorised healthcare practitioners, referral hospitals and specialists |
| Clinical and medical records (diagnoses, treatment plans, laboratory results, prescriptions) | Referring doctors, specialists, hospitals, laboratories, radiology centres, pharmacies, and other healthcare professionals involved in patient care                                        |
| Medical aid and billing information (claims, membership details, authorisations)             | Medical aid schemes, administrators, managed care organisations, billing service providers, and debt collection agencies (where applicable)                                                |
| Identity verification details (copies of ID documents, emergency contacts)                   | Medical aid schemes, healthcare verification systems, authorised administrative staff, and regulatory authorities where legally required                                                   |
| Health and safety records (where applicable to staff or clinical incidents)                  | Department of Employment and Labour, Compensation Fund, occupational health                                                                                                                |

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|                                                                                     | providers, health and safety consultants, and insurance providers                                                                                                                                      |
| Employment and HR-related records (staff)                                           | SARS, UIF, medical aid schemes, pension/provident fund administrators, payroll providers, auditors, training providers, and HR compliance consultants                                                  |
| Disciplinary, grievance, or employment-related records                              | Legal advisers, labour consultants, CCMA (Commission for Conciliation, Mediation and Arbitration), bargaining councils, and labour courts where applicable                                             |
| Insurance and professional indemnity information                                    | Medical malpractice insurers, liability insurers, insurance brokers, and claims administrators                                                                                                         |
| Training and professional development records                                       | Accredited training institutions, professional councils (e.g., HPCSA), Skills Development Facilitators (SDF), and SETAs                                                                                |
| CCTV Footage / Access Logs                                                          | Security service providers, facilities management companies, law enforcement authorities, and legal representatives where required                                                                     |
| Patient communication and contact information (appointments, reminders, follow-ups) | Practice management systems, SMS/email service providers, telehealth platforms, and authorised administrative personnel                                                                                |
| Client service usage data, system logs, IP addresses, device identifiers            | Cloud hosting providers, electronic medical record (EMR) system providers, IT support vendors, cybersecurity service providers, and data backup operators (all acting under POPIA operator agreements) |
| Software usage statistics, user experience data, and platform analytics             | Product development teams, data analytics service providers, CRM and marketing automation platforms                                                                                                    |
| Cloud backup and disaster recovery data                                             | Cloud infrastructure providers, data recovery partners (acting as operators under POPIA)                                                                                                               |
| Regulatory and compliance documentation                                             | Health Professions Council of South Africa (HPCSA), Department of Health, Information Regulator, auditors, and other statutory or regulatory bodies                                                    |
| Research or anonymised health data (where applicable)                               | Academic institutions, research organisations, and public health authorities (only where data is de-identified or consent has been obtained where required)                                            |

## 14 Planned Transborder Flows of Personal Information

- 14.1 The Company may share personal information with third parties and in certain instances this may result in transborder flow of the personal information. The personal information will always be subject to protection, not less than the protection it is afforded under the Protection

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of Personal Information Act No.4 of 2013. General description of information security measures to ensure the confidentiality, integrity and availability of the information:

- 14.1.1 Keeping our systems secure through access controls, system monitoring, and usage tracking;
- 14.1.2 Storing physical and digital records in secure, access-controlled environments;
- 14.1.3 Restricting access to buildings, systems, and records to authorised personnel only;
- 14.1.4 Securely destroying or deleting personal information once it is no longer required;
- 14.1.5 Ensuring compliance with relevant data protection standards, legal requirements, and industry codes of conduct.

14.2. In addition, the following technical security safeguards have been implemented to support these objectives:

- 14.2.1. Data encryption (at rest and in transit) to protect sensitive information from unauthorised access;
- 14.2.2. Anti-virus and anti-malware software to detect, prevent, and mitigate cyber threats;
- 14.2.3. Firewalls and intrusion detection/prevention systems (IDS/IPS) to monitor and safeguard network traffic;
- 14.2.4. Multi-factor authentication (MFA) and role-based access controls to limit access based on job function and business need;
- 14.2.5. Secure backup and disaster recovery solutions to ensure business continuity and data integrity;
- 14.2.6. Ongoing system monitoring and access logging to detect and respond to suspicious activity;
- 14.2.7. Physical security controls such as keycard access, secure storage, and visitor management procedures;
- 14.2.8. Employee training and awareness programmes to promote secure data handling and prevent human error;
- 14.2.9. Secure disposal of physical and electronic records when no longer needed or when required by law.
- 14.2.10. These safeguards are continuously reviewed and enhanced to address new risks, changing business processes, and advancements in technology.

## 15 Availability of the Manual

15.1 A copy of the manual is available:

- 15.1.1 On <http://chronosmedical.co.za> , or at any head office of Chronos Medical ( Pty) Ltd for public inspection during normal business hours;
- 15.1.2 To any person upon request and upon the payment of a reasonable prescribed fee; and
- 15.1.3 To the Information Regulator upon request.

15.2 A fee for a copy of the manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

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## 16 Objection to the Processing of Personal Information by a Data Subject

- 16.1 A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or section 11(3)(b) of the Act, must submit the objection to a responsible party at any time during office hours of a responsible party and free of charge.
- 16.2 A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to Form 3 herein, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11(3)(a) of the Act.
- 16.3 A responsible party must, when collecting personal information of a data subject, notify the data subject, in terms of section 18(1)(h)(iv) of the Act, of their right to object, as referred to in section 11(3) of the Act.
- 16.4 If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and upon request, be made available to the data subject in any manner, including the transcription thereof.

## 17 Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

- 17.1 A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.
- 17.2 A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- 17.3 A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.
- 17.4 A request for correction to or deletion of personal information, as referred to in sub-regulation 12.11.2 or a request for the destruction or deletion of a record of personal information, as referred to in sub-regulation 12.11.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms herein free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.
- 17.5 A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party and such recording must, upon request, be made available

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to a data subject in any manner, including the transcription thereof which shall be free of charge.

- 17.6 A responsible party must, within 30 (thirty) days of receipt of the outcome of the request referred to in sub-regulation 12.11.2 or 12.11.3, notify a data subject, in writing, of the action taken as a result of the request

## 18 Updating of the Manual

The head of Chronos Medical (Pty) Ltd will update this manual on a regular basis.

|                               |                  |
|-------------------------------|------------------|
| Name of IO                    | Tristan Biajnath |
| Title of the head of the body | Director         |

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## APPLICABLE FORMS

### PAIA Forms

**Form 01:** [Request for a Copy of the Guide from an Information Officer \[Regulation 3\]](#)

**Form 02:** [Request for Access to Record \[Regulation 7\]](#)

**Form 03:** [Outcome of Request and of Fees Payable \[Regulation 8\]](#)

**Form 05:** [Complaint Form \[Regulation 10\]](#)

**Form 13:** [PAIA Request for Compliance Assessment Form \[Regulation 14\(1\)\]](#)

### POPIA Forms

**Form 1:** [Objection to the Processing of Personal Information](#)

**Form 2:** [Request for Correction or Deletion of Personal Information or Deletion of Record of Personal Information](#)

**Form 3:** [Application for the Issue of a Code of Conduct](#)

**Form 4:** [Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing](#)

**Form 5:** [Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing](#)