

Lenmed PAIA Manual



Prepared in terms of Section 51 of the Promotion of Access to Information Act, No 2 of 2000 (“PAIA”), read with and as amended by the Protection of Personal Information Act, No 4 of 2013 (“POPIA”)

This manual applies to information held by:

Lenmed Investments Limited (Reg. No. 1980/003108/06), and all subsidiary companies and hospitals within the Lenmed Group, as more fully set out in paragraph 4 of this Manual.

(Hereinafter referred to as the “**Lenmed Group**”)

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Contents

1.	INTRODUCTION TO LENMED.....	4
2.	PURPOSE OF PAIA	4
3.	INFORMATION MANUAL.....	4
4.	ENTITIES THAT THIS MANUAL APPLIES TO.....	5
5.	CONTACT DETAILS OF THE LENMED GROUP.....	7
6.	INFORMATION REGULATOR’S GUIDE AND CONTACT DETAILS	7
7.	CATEGORIES OF RECORDS AVAILABLE WITHOUT HAVING TO REQUEST ACCESS IN TERMS OF SECTION 52(2) OF PAIA	8
8.	RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION, IN TERMS OF SECTION 51(1)(D) OF PAIA.....	8
9.	SUBJECT CATEGORIES OF RECORDS.....	9
10.	PROCESSING OF PERSONAL INFORMATION	11
11.	CATEGORIES OF DATA SUBJECTS	12
12.	PURPOSE OF PROCESSING	12
13.	RECIPIENTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED	14
14.	PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION	15
15.	SECURITY MEASURES	15
16.	GROUNDINGS FOR REFUSAL OF ACCESS TO RECORDS	16
17.	ACCESS TO HEALTH OR OTHER RECORDS IN TERMS OF SECTION 61 OF PAIA.....	17
18.	ACCESS REQUESTS AND PROCEDURES.....	18
19.	REMEDIES AVAILABLE WHEN ACCESS TO A RECORD IS REFUSED.....	22
20.	ANNEXURE A: PRESCRIBED FEES	23
21.	ANNEXURE B: PRESCRIBED FORM.....	26

1. Introduction to Lenmed

The Lenmed Health story is one of triumph and commitment which all began in 1984 when the first Lenmed Health hospital opened its doors in Lenasia. The Group is now an established South African hospital group providing private patient healthcare in Africa through the management and ownership of hospitals and other related health services.

Lenmed Group's initial strategy of sustained growth and expansion has consistently delivered results, making us one of the leading independent healthcare groups in the country. With a solid foundation on which to build, the group intends to establish a greater presence in South Africa as well as to expand further across key African countries.

The Lenmed Group is committed to creating places of healing for their communities, focused on attracting the best expertise and dedicated to building a steadfast, devoted team.

2. Purpose of PAIA

The purpose of PAIA is to promote the right of access to information and to foster a culture of transparency and accountability by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.

In terms of section 51 of PAIA, as amended by POPIA, all private bodies are required to compile an information manual and make the manual available to the public to inform the procedure which the public must follow, when submitting a request to access the private bodies records.

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

3. Purpose of this PAIA Manual

Companies forming part of the Lenmed Group are defined as a private body in terms of PAIA. PAIA requires that an information manual be compiled by private bodies that provides information on the type and the categories of records held by a private body.

The Lenmed Group hereby publishes its PAIA manual (this "**Manual**") in terms of PAIA. This Manual is prepared in compliance with the provisions of Section 51 of PAIA, as amended by POPIA.

The purpose of this manual is to facilitate requests for access to records of the Lenmed Group. This manual is not exhaustive of, nor does it comprehensively deal with every procedure provided for in PAIA. Requestors are advised to familiarise themselves with the provision of PAIA before making any request to the Lenmed Group in terms of PAIA.

This Manual is useful for the public to-

- check the categories of records held by the Lenmed Group which are available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a request for access to a record of the Lenmed Group, by providing a description of the subjects on which the Lenmed Group holds records and the categories of records held on each subject;
- know the description of the records of the Lenmed Group which are available in accordance with any other legislation;
- access all the relevant contact details of the Lenmed Group's Information Officer who will assist the public with the records they intend to access;
- know the description of the guide on how to use PAIA, as updated by the Information Regulator and how to obtain access to it;
- know if the Lenmed Group 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;
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- know if the Lenmed Group has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- know whether the Lenmed Group has appropriate security measures to ensure the

confidentiality, integrity and availability of the personal information which is to be processed.

Nothing stated in this Manual shall limit, or constitute a waiver of, any of the rights of the requestor or of the Lenmed Group in terms of PAIA. Lenmed Group makes no representation and gives no undertaking that the information in this Manual or any information provided by the Lenmed Group to requestors thereof is complete or accurate, or that such information is fit for any purpose. All users of any such information shall use such information entirely at their own risk and Lenmed Group shall not be liable for any loss, expense, liability or claims howsoever arising, resulting from any use of this Manual or any information provided by Lenmed Group or from error therein.

All users irrevocably agree to submit exclusively to the laws of the Republic of South Africa and to the exclusive jurisdiction of the courts of the Republic of South Africa in respect of any dispute arising out of the use of this Manual or of any information provided by the Lenmed Group.

This Manual is available for public inspection at the physical address of the Lenmed Group as set out in paragraph 5 below and is also available on our website at www.lenmed.com. A copy of our manual can be provided, on request, to any person (along with the payment of a prescribed fee where applicable).

4. Entities that this Manual applies to

This Manual is for, and applies to, the following entities within the Lenmed Group:

Hospital Name	Region	Reg No	Physical Address
Lenmed Health Management Company (PTY) Ltd	Gauteng	2010/004046/07	Building 9 Fountain View House 2nd Floor, Constantia Park, Constantia Kloof Gauteng, 1709
Lenmed Health Ahmed Kathrada (PTY) Ltd	Gauteng	2006/002764/07	K43 Highway, Lenasia Ext 8 JHB, Gauteng
Lenmed Health Zamokuhle (PTY) Ltd	Gauteng	2005/017980/07	128 Flint Mazibuko Street, Hospital View Tembisa, 1632
Lenmed Health Daxina Private Hospital (PTY) Ltd	Gauteng	2006/021573/07	1682 Impala Street Lenasia South, 1829
Ethekwini Hospital and Heart Centre	KZN	2002/002222/07	11 Riverhorse Drive, Riverhorse Valley Business Estate, Queen Nandi Drive Durban
Lenmed Health Shifa (PTY) Ltd	KZN	2000/006080/07	482 Randles Road, Sydenham Durban, 4091
Lenmed Health La Verna (PTY) Ltd	KZN	1988/004487/07	1 Convent Road, Ladysmith, 3370
Royal Hospital and Heart Centre	NC	2009/011218/07	Cnr Welgevonden Street & Jacobus Smut, Roysdene, Kimberly, 8301
Lenmed Health Kathu Private Hospital (PTY) Ltd	NC	2013/229376/07	Frikkie Meyer Street, Kathu, 8446
Lenmed Health Randfontein Private Hospital (PTY) Ltd	Gauteng	2012/006706/07	Ward Street, Extension Randfontein, 1759
Howick Private Hospital (PTY) LTD	KZN	1994/003179/07	Main Street 107, Howick, 3290

Lenmed Nursing College (TY)Ltd	Gauteng	2012/059126/07	Station Ave, Lenasia Square, Lenasia,1820
Daleside Day Hospital (PTY) Ltd	NW	1998/013961/07	12 Van Ryneveld Wilkoppies, Klersdrop, 2570
Wilmed Trading Trust T/A Wilmed Park Private Hospital	NW	IT3193/95	Cnr Marmer & Ametis Str Wilkoppies, Klerksdrop, 2570
Perlucia (Pty) Ltd T/A Parkmed Neuroclinic	NW	2011/0088312/07	94 Bishop Desmond Tutu Str, Klerksdrop, 2570
Sunningdale Trust T/A Sunningdale Hospital	NW	IT10890/96	12 Van Ryneveld Wilkoppies, Klersdrop, 2570

5. Contact details for access to the Information of the Lenmed Group

Chief Executive Officer:	Mr Amil Devchand
Information Officer:	Mr Jayesh Parshotam
Physical Address:	2nd Floor, Building 9, Constantia Park, Cnr Hendrick Potgieter and 14th Avenue, Constantia Kloof
Postal Address:	P.O Box 855, Lenasia, 1820
Telephone Number:	+27 (0)87 087 0600
Email Address:	info@lenmed.co.za
Website:	www.lenmed.com

6. Guide on how to use PAIA and how to obtain access to the Guide

The Information 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, to assist a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is made available by the Information Regulator in each of the official languages and in braille.

The Guide contains a description of:

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body, and every Deputy Information

Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA ;

- the manner and form of a request for access to a record of a public body contemplated in section 11 of PAIA and access to a record of a private body contemplated in section 50 of PAIA;
- the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- the assistance available from the Information Regulator in terms of PAIA and POPIA;
- 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-
 - an internal appeal;
 - a complaint to the Information Regulator; and
 - an application with a court against a decision by the information officer 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;
- the provisions of sections 14 and 51 of PAIA, requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92 of PAIA.

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 Information Regulator, during normal working hours. The Guide can also be obtained on request to the Information Officer or from the website of the Information Regulator (<https://info regulator.org.za/paia-guidelines/>).

A copy of the Guide is also available in the English, Zulu, Pedi and Afrikaans, for public inspection all site during normal office hours and on our website (<https://www.lenmed.co.za/paia>).

7. Categories of records of Lenmed Group which are available without

having to request access (in terms of section 52(2) of PAIA)

A private body may, on a voluntary basis, make available a description of categories of records that are automatically available without a person having to request access in terms of PAIA.

Employees can request access to their own records in accordance with Lenmed Group's internal access processes and Procedures.

The Lenmed Group has not made available any records that are automatically available without a person having to request access in terms of PAIA, save for those that are publicly available for viewing on its website.

8. Records held in accordance with other legislation, in terms of section 51(1)(d) of PAIA

Records are kept by the Lenmed Group in accordance with South African legislation, such as but not limited to*:

- Basic Conditions of Employment Act 75 of 1997;
- Children's Act 38 of 2005;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- Competition Act 89 of 1998;
- Consumer Protection Act 68 of 2008;
- Employment Equity Act 55 of 1998;
- Hazardous Substances Act 15 of 1973;
- Income Tax Act 58 of 1962;
- Labour Relations Act 66 of 1995;
- National Credit Act 34 of 2005;
- National Health Act 61 of 2003;
- National Radioactive Waste Disposal Institute Act 53 of 2008;
- Occupational Health and Safety Act 85 of 1993;
- Promotion of Access to Information Act 2 of 2000;

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- Protection of Personal Information Act 4 of 2013;
 - Skills Development Act 97 of 1998;
 - Skills Development Levies Act 55 of 1998;
 - Trade Marks Act 194 of 1993;
 - Unemployment Insurance Act 63 of 2001;
 - Value Added Tax Act 58 of 1962.

**Note: This is not an exhaustive list of legislation that may require the Lenmed Group to keep records.*

9. Subject categories of records

The records held by the Lenmed Group are classified into the following categories:

Company Secretarial

- Company Memorandum of Incorporation
- Registers
- Minutes of meetings and resolutions
- Statutory returns

Movable and Immovable Property

- Title Deeds
- Lease Agreements
- Hire agreements
- Hire-purchase agreements
- Credit sale agreements
- Ordinary and conditional sale agreements

Intellectual Property

- Trade-marks
- Patents
- Copyright
- Designs
- Licensing agreements
- Hospital Licences

Insurance

- Policies
- Insurance claim files

- Insurance Agreements

Taxation

- Income tax files

Finance

- Financial statements
- Reports and returns
- Banking details and bank account records
- Debtors/creditors statements and invoices

Human Resources

- Policies and procedures
- Employee/Personnel information
- External Candidate Application Information
- Medical Aid Information
- Pension Fund Information
- Learnerships and Internships
- IRP5 Certificates
- SARS (UIF, PAYE, COID and SDL)
- Garnishees
- Union Administration – Membership Fee
- Outsourced Companies (Gigima / Altron)
- Personnel files
- Conditions of Employment
- Recruitment Forms (Interview Guides)
- Identity Documents
- Work Permits and VISAs
- Internal Evaluation Records
- Correspondence
- Training Schedules and Related Material
- Agreements
- Forms and applications
- Standard letters and notices

Operations

- Policies and procedures
- Reports and supporting documentation
- General operational Agreements

Information technology

- System documentation and manuals
- Information technology Agreements

Patient information

- Patient information
- Patient health records
- Patient files
- Patient Agreements
- Patient records or information provided by a third party (for example, but not limited to, records from a medical practitioner or healthcare provider, pathology provider, radiology provider or allied healthcare professional)

Third Party Records

- Records held by the Lenmed Group relating to other parties, including but not limited to contractual records, correspondence, financial records, records provided by other parties and records third parties have provided about the Company's contractors and suppliers in respect of contractors, suppliers, and service providers.

Administration

- Internet (www.lenmed.com)
- General administrative records required for the management of the businesses within the Lenmed Group
- Correspondence with internal and external parties
- General administrative Agreements

These records include, but are not limited to, any and all records, which pertain to the Lenmed Group's internal and external affairs.

10. Processing of Personal Information

As a South African Group of Companies, all data processing activities are primarily regulated by the Protection of Personal Information Act, No. 4 of 2013 ("POPIA"), as amended from time to time. Lenmed Group's Privacy Notice, as published on our website (and as amended or updated from time to time), sets out how the Lenmed Group processes and protects personal information. For full details regarding how the Lenmed Group processes personal information, please refer to our [Privacy Notice](#).

Note: Employees, consultants and volunteers contracted within Lenmed are referred to a

separate employee privacy notice which is available on the Lenmed intranet or on request from Lenmed’s HR department.

11. Categories of Data Subjects

The Lenmed Group holds personal information and records on various data subject categories, which include but are not limited to the following Data Subject categories:

(Note: this is not an exhaustive list)

- Website users;
- Patients and Guarantors;
- Suppliers and service providers;
- Job applicants/job candidates;
- Medical Graduates;
- Medical practitioners, medical practices, allied health professionals and other healthcare suppliers and service providers providing medical services at our hospitals;
- Medical Schemes and Administrators, Managed Healthcare Organisations and Medical Insurers;
- Employees, consultants and volunteers contracted with the Lenmed Group; and
- Other general data subject categories.

12. Categories of personal information collected and processed; and purpose of processing

The below table sets out i) the categories of personal information we may collect and process, and ii) the purpose that we may process your personal information for (including, where applicable your special personal information, such as your medical information).

PATIENTS, AND GUARANTORS (WHERE APPLICABLE)	
Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> • Personal Identification details such as name, surname, ID/Passport Number; • Contact details, such as phone number, email address, physical and postal addresses; 	<ul style="list-style-type: none"> • To provide the data subject with our products and services; • To process a data subject’s hospital admission (including pre-admission through our website) or to process any other enquiry that the data subject may make with the Lenmed Group, whether through our website, or directly with any entity within the Lenmed Group; • To make an online appointment through our website;

pg 25 of 30

<ul style="list-style-type: none"> • Personal details, such as names, family information, ages and next of kin details; • Employment details, such as occupation, employment status and Employer details; • Demographical details, such as gender, race, and age; • Pre-admission information; • Admission information; • Patient Number (assigned unique identifier); • Details of referring medical practitioner (name, practice and contact details); • Health information and other special personal information regarding your medical treatment (historic and current); • Children’s personal information, for children (under the age of 18) who receive treatment and care at a Lenmed hospital; • Biometric information (where applicable and required for the purposes of your treatment and care); • Financial information, such as invoicing details, banking details, credit card details or account numbers, etc.; • Credit information; • Medical Scheme / Medical Insurer information; • Background information (where applicable and required for the purposes of your treatment and care); • When entering any of our hospitals or offices, CCTV Camera Footage 	<ul style="list-style-type: none"> • To assess any medical treatment the data subject may require; • To refer a Patient for treatment at one of our Hospitals (in respect of patient enquiries and patients seeking treatment from within and/or outside of South Africa); • To provide the data subject with appropriate treatment and care and to enable treating medical practitioners, medical practices (including radiology and pathology practices), Allied health professionals and other medical persons involved in the data subject’s treatment and care, to provide the data subject with appropriate treatment and care; • To prepare and process Patient invoices, accounts and refunds; • To process any claim that may be made on a data subject’s behalf with the data subject’s medical aid scheme (including the scheme administrator) or any third party medical insurer that the data subject has contracted with; • To process any medical claim that may be made by us with the Road Accident Fund (under the Road Accident Fund Act) or the Compensation Fund (under the Compensation for Occupational Injuries and Diseases Act) or any other similar body, in relation to the data subject’s treatment and care; • Where applicable, for general marketing and communication purposes, where the data subject is an existing customer of the Lenmed Group or where we have received the data subject’s consent to receive these communications, and in compliance with the provisions of POPIA. Data subjects will be given the opportunity to unsubscribe from any marketing communications, general communications and/or newsletters at any time, and with each communication received; • To improve the Lenmed Group’s services, the quality of our care, the quality of the medical technology that we have available at our hospitals, and to manage our relationship with our customers, for example by asking for feedback on the services and quality of care a data subject received from us or through the completion of customer experience surveys and through customer experience analysis; • For credit checking or credit reporting purposes (though a credit bureau), in order to assist our decision to provide services to a data subject or to report on any slow or non-payment of a data subject’s accounts with us;
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<p>collected in our hospitals or offices which are protected by CCTV cameras for security purposes;</p> <ul style="list-style-type: none"> Any other information as may be relevant or required in order to achieve the purpose for which we are collecting and processing the personal information. 	<ul style="list-style-type: none"> For reporting (including but not limited to efficiency management and reporting), statistical, analytical, research and historical purposes; For reporting on quality incidents, as required by law; In relation to CCTV camera footage, for various purposes, including (i) to ensure the security of Lenmed premises, the safety of our employees and visitors, and the security of property and information located and/or stored at Lenmed premises; (ii) to prevent, deter, and if necessary investigate unauthorised access to secure premises and protected rooms, IT infrastructure or operational information; (iii) to prevent, detect and investigate theft of equipment, assets or other property at a Lenmed premises or threats of safety to persons on a Lenmed premises; and (iv) for evidentiary purposes where an incident occurs; For any other purposes as may be specifically set out in our Admission Form concluded with the data subject upon admission to one of our Hospitals; For the general purposes as set out below.
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SUPPLIERS AND SERVICE PROVIDERS

Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> Where a company, company identification and registration details, details of owners/ shareholders/ directors; Where an individual, personal identification details such as name, surname, ID/Passport Number; Contact details, such as phone numbers, email addresses, physical and postal addresses; Financial information, such as invoicing details, VAT details, banking details etc.; BBBEE and other regulatory information (where required and relevant); Representative/ contact person information (contact details, such as name, telephone number and email 	<ul style="list-style-type: none"> To conclude, perform and/or receive performance of a contract with the Supplier or Service Provider, or to take any take steps linked to or necessary for the conclusion or performance of a contract with the Supplier or Service Provider, including (but not limited to): <ul style="list-style-type: none"> Authentication of supplier / service provider; BBBEE verification; and Processing of accounts, invoices and payments; For the purposes of our annual BBBEE submission and accreditation; In relation to CCTV camera footage, for various purposes, including (i) to ensure the security of Lenmed premises, the safety of our employees and visitors, and the security of property and information located and/or stored at Lenmed premises; (ii) to prevent, deter, and if necessary investigate unauthorised access to secure premises and protected rooms, IT infrastructure or operational information; (iii) to prevent, detect and investigate theft of equipment, assets or other property at a Lenmed premises or threats of safety

<p>address, of persons managing the supplier/service providers services or providing the product and services on behalf of the supplier, or personal information of employees who are entering or accessing a Lenmed health hospital or office or working on site);</p> <ul style="list-style-type: none"> • Biometric information (only in circumstances where Service Provider / Supplier employees are working on site and/or where security background checks are required); • Occupational Health and Safety medical records held on safety files, in respect of contractors providing building and/or engineering services at a Lenmed Site; • When entering any of our hospitals or offices, CCTV Camera Footage collected in our hospitals or offices which are protected by CCTV cameras for security purposes; • Information shared or disclosed through the performance of a contract (such as confidential or proprietary information); • Any other personal information that may be relevant or required to conclude, perform and/or receive performance of a contract with the Supplier or Service Provider or to achieve the purpose for which we are collecting and processing the personal information. 	<p>to persons on a Lenmed premises; and (iv) for evidentiary purposes where an incident occurs;</p> <ul style="list-style-type: none"> • For the general purposes as set out below.
MEDICAL PRACTITIONERS, MEDICAL PRACTICES, ALLIED HEALTH PROFESSIONALS AND OTHER HEALTHCARE SUPPLIERS AND SERVICE PROVIDERS PROVIDING MEDICAL SERVICES AT OUR HOSPITALS	
Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> • Where an individual, personal Identification details such as name, surname, ID/Passport Number; 	<ul style="list-style-type: none"> • For reporting (including but not limited to efficiency management and reporting), statistical, analytical, research and historical purposes;

<ul style="list-style-type: none"> • Where a company, Company identification and registration details, details of owners/ shareholders/ directors; • Contact details, such as phone numbers, email addresses, physical and postal addresses; • Demographical details, such as gender, race, and age; • Financial information, such as invoicing details, banking details etc.; • Information that may be relevant and/or required in relation to the submission of claims to Medical schemes; • Professional body registration information and practice information; • Qualification Information and certificates of qualifications; • Professional Indemnity and Medical malpractice insurance information; • CCTV Camera Footage collected by our hospitals and offices, which are protected by CCTV cameras for security purposes; • Information shared or disclosed through the performance of a contract (such as confidential or proprietary information); • Any other information as may be relevant or required in order to achieve the purpose for which we are collecting and processing the personal information. 	<ul style="list-style-type: none"> • To provide a Patient with appropriate treatment and care and to enable treating medical practitioners, medical practices (including radiology and pathology practices), Allied health professionals and other medical persons involved in the Patient’s treatment and care, to provide the Patient with appropriate treatment and care; • To process any claim that may be made on a Patient’s behalf with the Patient’s medical aid scheme (including the scheme administrator) or any third party medical insurer that the Patient has contracted with; • To process any medical claim that may be made by us, whether with you or on your behalf, with the Road Accident Fund (under the Road Accident Fund Act) or the Compensation Fund (under the Compensation for Occupational Injuries and Diseases Act) or any other similar body, in relation to a Patient’s treatment and care; • Where applicable, for general marketing and communication purposes related to our services and our Hospitals; • To improve the Lenmed Group’s services, the quality of our care, the quality of the medical technology that we have available at our hospitals, and to manage our relationship; • In relation to Healthcare Suppliers and Service Providers providing medical services at our hospitals, to conclude, perform and/or receive performance of a contract with the Healthcare Supplier or Service Provider, or to take any take steps linked to or necessary for the conclusion or performance of a contract with the Healthcare Supplier or Service Provider, including (but not limited to): <ul style="list-style-type: none"> ○ Authentication of Healthcare Supplier / Service Provider; ○ BBBEE verification; and ○ Processing of accounts, invoices and payments (where applicable); • For the purposes of our annual BBBEE submission and accreditation (where applicable); • For the purchasing on medicinal and medically related products; • In relation to Medical Practitioners, Medical Practices and Allied Health Professionals, qualification information and certificates are required for the purposes of:
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	<ul style="list-style-type: none"> • Confirmation of qualifications; • Legal script and drug management; and • Recruitment of Medical Practitioners to provide medical services at our Hospitals. • In relation to CCTV camera footage, for various purposes, including (i) to ensure the security of Lenmed premises, the safety of our employees and visitors, and the security of property and information located and/or stored at Lenmed premises; (ii) to prevent, deter, and if necessary investigate unauthorised access to secure premises and protected rooms, IT infrastructure or operational information; (iii) to prevent, detect and investigate theft of equipment, assets or other property at a Lenmed premises or threats of safety to persons on a Lenmed premises; and (iv) for evidentiary purposes where an incident occurs; • For the general purposes as set out below.
MEDICAL SCHEMES AND ADMINISTRATORS, MANAGED HEALTHCARE ORGANISATIONS AND MEDICAL INSURERS	
Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> • Company identification and registration details; • Contact details, such as phone numbers, email addresses, physical and postal addresses; • Plan and Benefit information; • Information shared or disclosed through the performance of a contract (such as confidential or proprietary information); • Financial information, such as invoicing details, banking details etc.; • Representative/ contact person information (contact details, such as name, telephone number and email address) of persons engaging with us on behalf of the medical aid scheme (including the scheme administrator), managed healthcare organisation or any third party medical insurer; 	<ul style="list-style-type: none"> • To process a Patient’s hospital admission (including pre-admission); • To process any claim that may be made on a Patient or member’s behalf with the medical aid scheme (including the scheme administrator), managed healthcare organisation or any third party medical insurer that the Patient and/or member has contracted with; • For reporting (including but not limited to efficiency management and reporting), statistical, analytical, research and historical purposes; • For the general purposes as set out below.

<ul style="list-style-type: none"> Any other information as may be relevant or required in order to achieve the purpose for which we are collecting and processing the personal information. 	
JOB APPLICANTS / JOB CANDIDATES	
Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> Identification details such as name, surname, ID/Passport Number; Contact details, such as phone numbers, email addresses, physical and postal addresses; Demographical details, such as race, gender, language and age; Qualification information, CV's and other personal information that may be requested throughout the recruitment process to assess and consider the job application (in relation to job applicants); Professional body registration information (where applicable) Background information, including references for reference checking and background searches; Biometric information, only to the extent required in relation to conducting background checks; Financial information, such as banking details and prior payslips, only as and when required within the recruitment process; Medical Scheme, Pension / Provident fund information, only as and when required within the recruitment process; When entering any of our hospitals or offices, CCTV Camera Footage collected in our hospitals or offices 	<ul style="list-style-type: none"> Where a data subject is applying for a vacancy, to process the data subject's application throughout our recruitment process; In relation to CCTV camera footage, for various purposes, including (i) to ensure the security of Lenmed premises, the safety of our employees and visitors, and the security of property and information located and/or stored at Lenmed premises; (ii) to prevent, deter, and if necessary investigate unauthorised access to secure premises and protected rooms, IT infrastructure or operational information; (iii) to prevent, detect and investigate theft of equipment, assets or other property at a Lenmed premises or threats of safety to persons on a Lenmed premises; and (iv) for evidentiary purposes where an incident occurs; For the general purposes as set out below.

<p>which are protected by CCTV cameras for security purposes;</p> <ul style="list-style-type: none"> Any other personal information that may be relevant or required to conclude a contract of employment with the candidate (where successful) or to achieve the purpose for which we are collecting and processing the personal information. 	
MEDICAL GRADUATES	
Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> Identification details such as name, surname, ID/Passport Number; Contact details, such as phone numbers, email addresses, physical and postal addresses; Demographical details, such as race, gender, language and age; Qualification information; Any other personal information that may be relevant or required for the purposes of recruiting graduate medical practitioners to provide medical services at one of our Hospitals; 	<ul style="list-style-type: none"> Graduate lists are procured from Medical schools to assist us in the recruitment of newly qualified medical practitioners to provide medical services at our Hospitals; To conclude, perform and/or receive performance of a contract with a graduate medical practitioner, or to take any take steps linked to or necessary for the conclusion or performance of a contract with a graduate medical practitioner; For the general purposes as set out below.
OTHER GENERAL DATA SUBJECT CATEGORIES	
Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> Shareholders: <ul style="list-style-type: none"> Where a company or trust, company/trust identification and registration details, details of owners/ shareholders/ directors/trustees/beneficiaries; Where an individual, personal identification details such as name, surname, ID/Passport Number; 	<ul style="list-style-type: none"> To manage our relationship with our shareholders, for the management and performance of regulatory obligations by and to our shareholders, and for the general purposes as set out below.

<ul style="list-style-type: none"> • Contact details, such as phone numbers, email addresses, physical and postal addresses; • Financial information, such as invoicing details, banking details, tax information, etc; • BBBEE and other regulatory information (where required and relevant); • Colleagues and business connections: Identification details such as name and surname, and contact details, such as phone numbers, email addresses, physical and postal addresses; • Companies with whom we intend to do business or conclude transactions with: <ul style="list-style-type: none"> ○ information collected may include (but not be limited to) Company information including ownership information, company data, financial information and shareholders agreements. 	<ul style="list-style-type: none"> • To engage in work related matters and (where applicable) for the general purposes as set out below. • To enter into discussions for the conclusion of business transactions, to conclude business transaction, and all matters related thereto.
WEBSITE USERS	
Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> • When you use one of our Webforms on our website (including general enquiries, online hospital pre-admissions, online appointments) personal information will be requested (depending on the nature of the form) and once submitted will be stored in the database of our website. All data submitted by our Webforms is encrypted; • When visiting our website, anonymised data relating to your location and your browser type, browser version, the pages of our website that you visit, the date and time of your visit, the duration of 	<ul style="list-style-type: none"> • In relation to the use of our website, to identify, investigate and attend to any technical issues, support and user queries; • To detect, prevent or deal with any actual or alleged fraud, security breach, or the abuse, misuse or unauthorised use of the website and/or contravention of our Privacy Notice; • To process a Patient’s hospital admission (including pre-admission through our website); • To make an online appointment through our website; • To process any enquiry that a data subject may make with the Lenmed Group, through our website; • For the general purposes as set out below.

<p>time spent on the website pages and other applicable statistics are recorded by Google Analytics to analyse user behaviour on our website. No personally identifiable information is collected at any point.</p>	
EMPLOYEES AND CONSULTANTS CONTRACTED TO LENMED, AND TO THE EXTENT APPLICABLE AND REQUIRED VOLUNTEERS	
Categories of personal information collected and processed	Purpose of processing
<ul style="list-style-type: none"> • Identification details such as name, surname, ID/Passport Number; • Contact details, such as phone numbers, email addresses, physical and postal addresses; • Personal details, such as names, family information, next of kin details, employee benefit information, dependant details (e.g. spouses and children); • Demographical details, such as race, gender, language, marital status and age groups; • Biometric information; • Financial information, such as bank account details, tax information, salary and payslip information, court mandated information (e.g. garnishee orders); • Employee benefit information, such as medical scheme information, pension and/or provident fund information, death and disability cover information, and all other relevant information collected/processed in relation to all employee benefits provided by Lenmed, and where applicable may include dependants' information (as beneficiaries of these benefits); 	<ul style="list-style-type: none"> • To conclude and perform under our contract of employment with you and to take any steps linked to or necessary to conclude or perform under our employment contract with you; • To manage, operate and administer your employment with us and to enable you to carry out your employment with us; • Where applicable, to provide you with and to manage Employee benefits offered by Lenmed, such as medical aid, retirement fund benefits, insurance benefits, employee health and wellness benefits, etc.; • Biometric information may be processed to enable you to access Lenmed's premises (where secured with biometric access control), or for the purposes of time-keeping and attendance (e.g. Kronos), or where applicable to conduct criminal or background checks for employee screening purposes; • Health information may be processed in instances where medical or health information is required to be collected, processed and/or considered by Lenmed in relation to your employment with Lenmed (including in relation to OHS or COIDA related matters); • Photographs may be taken, used and generally processed, for the purposes of Employee onboarding and introduction of new Employees, for internal Employee promotions or job position changes, to celebrate achievements and winners in our newsletters and publications, and for use by Lenmed during your employment with the Lenmed Health generally). Some of these photos may be shared on Lenmed's social media platforms, in accordance with Lenmed's social media policy, and you consent to Lenmed Health posting photos of you on its social media platforms, where required, unless you specifically notify the Lenmed Health head office marketing department that you do not

<ul style="list-style-type: none"> • Background information, such as background checks, criminal checks and reference checks; • Qualification information, such as CV's qualifications, work experience and other related information, Professional body registration information (where applicable); • Professional body registration information, where the employee is a member of a professional body and such membership is relevant to the course and scope of his/her employment with us; • Health and medical information, where this is necessary based on the course and scope of the employee's employment, including health information that may be collected and processed for employee benefit, leave and/or disability purposes, occupational health and safety purposes in term of the Occupational Health and Safety Act ("OHS"), compensation for occupational injury and disease purposes in terms of the Compensation for Occupational Injuries and Diseases Act ("COIDA"), or in terms of any other applicable legislation; • Personal opinions and confidential correspondence, such as personal opinions about the employee, or received from an employee about another person, and private and confidential correspondences in relation to the employee's employment role or performance as an employee (e.g. performance assessments, grievances, complaints, disciplinary processes and the like); • Photographs and CCTV footage; 	<p>want your photos to be shared on its social media platforms;</p> <ul style="list-style-type: none"> • CCTV footage is collected by Lenmed for various purposes, including (i) to ensure the security of Lenmed premises, the safety of our Employees and visitors, and the security of property and information located and/or stored at Lenmed premises; (ii) to prevent, deter, and if necessary investigate unauthorised access to secure premises and protected rooms, IT infrastructure or operational information; (iii) to prevent, detect and investigate theft of equipment, assets or other property at a Lenmed premises or threats of safety to persons on a Lenmed premises; and (iv) for evidentiary purposes where an incident occurs; • To conduct disciplinary processes and procedures, investigate and address grievances, to manage and monitor your employment performance, or to investigate any fraud, misconduct or breach of your employment obligations; • For all other purposes that are or may in future be related to your employment with Lenmed; • For the general purposes as set out below.
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<ul style="list-style-type: none"> Any other personal information that may be relevant or required to conclude, perform or receive performance under a contract of employment with the employee or to achieve the purpose for which we are collecting and processing the personal information. 	
ALL DATA SUBJECTS	
General purposes in relation to all data subjects that personal information is collected from or about	
<p>In addition to the specific purposes as set out above, we may collect, use, share and/or generally process your personal information (including, where applicable and relevant, your special personal information) for the following general purposes:</p> <ul style="list-style-type: none"> To comply with all legislative and legal requirements placed on the Lenmed Group, which may include, but not be limited to, legislative reporting and document retention periods and where the law requires that information regarding certain diseases be notified to the authorities; To conclude or perform a contract with a data subject, or to take any take steps linked to or necessary for the conclusion or performance of a contract with the data subject; Where necessary, for any purposes which are in our, the data subject's or a third party's legitimate interest; To perform general administrative, operational, management, financial and performance functions and activities relating to the operation and running of our businesses, for the purposes of managing our legal and operational affairs; and for any purposes relating to our legal obligations or our legitimate business needs; Where applicable, for general marketing and communication purposes, where the data subject is an existing customer of the Lenmed Group or where we have received the data subject's consent to receive these communications, and in compliance with the provisions of POPIA. Data subjects will be given the opportunity to unsubscribe from any marketing communications, general communications and/or newsletters at any time, and with each communication received; For reporting, statistical, analytical, research and historical purposes; For any purposes which are required or authorised by law; To respond to requests by government, a court of law, or law enforcement authorities conducting an investigation; To detect, prevent or deal with any actual or alleged fraud, security breach or other incident. <p>We may also collect, use, share and/or generally process personal information or data, including health information that has been de-identified and/or aggregated, for example statistical or demographic data, for any purpose. In certain circumstances this aggregated or de-identified data may also be commercialised. Aggregated or de-identified data is not considered personal information in terms of POPIA, as this information is de-identified and does not, directly or indirectly, reveal your identity.</p>	

13. Recipients to whom Personal Information may be supplied

The Lenmed Group values and respects the confidentiality and privacy of the personal information that data subjects entrust us with. Lenmed Group will not share or disclose personal information to anyone except as provided in our Privacy Notice and/or any contracts or terms and conditions of Service concluded with us.

Generally, The Lenmed Group may share a data subject's personal information (including, where applicable, special personal information) in the following instances:

(Note: this is not an exhaustive list)

- If it is necessary in order to provide the data subject with a service that the data subject has requested or has contracted us to provide or source on the data subject's behalf;
- If it is necessary in order to provide the data subject with proper treatment and care;
- If it is in the data subject's legitimate interest;
- If it is necessary for the proper performance of a public law duty by a public body;
- If it is required or authorised by law;
- If the data subject has provided us with consent;
- With third party medical practitioners, medical practices, medical facilities (including pathology and radiology medical practices) and Allied health professionals who are involved in a data subject's treatment and care;
- With a data subject's medical scheme and its medical scheme administrator, the Road Accident Fund (under the Road Accident Fund Act) or the compensation fund (under the Compensation for Occupational Injuries and Diseases Act) or any other similar body, for the purposes of submitting and processing any claims made to these Parties associated with the treatment and care provided to a data subject;
- With our service providers (including our suppliers, subcontractors, affiliates, partners, agents and professional advisors), in order to provide data subjects with our services, to provide data subjects with proper treatment and care, for efficiency reporting purposes or generally as required for the administration and management of our businesses. In these instances, we will ensure that the necessary security safeguards and confidentiality undertakings are in place to secure the data subject's personal information. The Lenmed Group will only allow third parties to process a data subject's personal information for a specific purpose, in accordance with our instructions and in accordance with the requirements of POPIA and any other applicable data privacy laws;
- With our employees, who may require that information to do their jobs;
- With regulators and government authorities in connection with our compliance procedures and legal obligations;
- With a purchaser or prospective purchaser of all or part of our assets or our business (or the business of any subsidiary company) or the shares of our company (or any subsidiary

company), and their professional advisers, in connection with the purchase;

- With a third party, in order to enforce or defend our rights, or to address financial or reputational risks.

14. Planned transborder flows of Personal Information

While Lenmed Group entities located in the Republic of South Africa and subject to the provisions of POPIA endeavour, as far as reasonably possible, to store personal information locally in South Africa, we may be required to transfer to and/or store personal information on servers located outside of South Africa. The Lenmed Group may also have third party service providers that are located outside of South Africa, which may result in personal information being transferred and processed outside of South Africa. Given the nature of the Lenmed Group's business, some of this personal information may be health information or other categories of special personal information, and some of this information may include the personal information of children.

Lenmed Group will take reasonable and appropriate measures to ensure that any personal information, special personal information or children's information that is transferred outside of the borders of South Africa is transferred in compliance with the requirements of POPIA and that an adequate level of privacy protection is in place between us and these third-party service providers.

15. Security measures

Securing the personal information that a data subject gives us, or that we receive about a data subject, is a priority for the Lenmed Group. In accordance with the requirements of POPIA, the Lenmed Group secures the integrity and confidentiality of personal information in its possession or under its control by taking appropriate and reasonable technical and organisational security measures to prevent:

- Loss of, damage to or unauthorised destruction of personal information; and
- Unlawful access to or processing of personal information.

The Lenmed Group has taken reasonable measures to:

- Identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control;
- Establish and maintain appropriate safeguards against the risks identified;

- Regularly verify that the safeguards are effectively implemented; and
- Ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

16. Grounds for refusal of access to records

The Lenmed Group may refuse a request for access to information on the following basis:

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person, including a deceased person;
- Mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that third party;
 - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party; and
 - Information disclosed in confidence by a third party to the Lenmed Group, if the disclosure could put that third party at a disadvantage in commercial or other negotiations or could prejudice that third party in commercial competition;
- Mandatory protection of confidential information of third parties, if it is protected in terms of any agreement or legislation;
- Mandatory protection of the life or physical safety of individuals and/or the protection or security of any property;
- Mandatory protection of records which would be regarded as privileged in legal proceedings;
- The commercial activities of the Lenmed Group, which may include:
 - Trade secrets of the Lenmed Group;
 - Financial, commercial, scientific or technical information which, if disclosed, would be likely to cause harm to the financial or commercial interests of the Lenmed Group;
 - Information which, if disclosed, could put the Lenmed Group at a disadvantage in contractual or other negotiations or could prejudice the Lenmed Group in commercial competition;

- A computer program which is owned by the Lenmed Group and which is protected by copyright;
- The research information of the Lenmed Group or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage;
- Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused;
- Generally, any other refusal prescribed or permitted in terms of PAIA;
- Mandatory protection of personal information to comply with the provisions of the Protection of Personal Information Act 4 of 2013;
- If a record requested cannot be found, or does not exist, the Information Officer shall notify the Requester in accordance with the requirements of PAIA;
- Any other reason that is permitted or prescribed in terms of any other applicable law.

17. Access to health or other records in terms of Section 61 of PAIA

- For the purposes of this paragraph 17, the term 'relevant person' shall refer to the requester and/or the authorised person making a request on the persons behalf.
- Requesters must stipulate in their request for access to information and/or records what health related information is required, understanding that information held by a medical practitioner must be obtained directly from him or her. The Lenmed Group cannot release information held by another party, or information that is protected by a medical practitioner/patient relationship.
- The Information Officer may only grant a request for access to information and/or a record provided by a medical practitioner in his or her capacity as such, about the physical or mental health of the requester, if requested by the requester him or herself or if requested by an authorised person making such a request on behalf of the person concerned.
- The Information Officer may in terms of section 61(1) of PAIA, refuse access to information and/or record/s, if he or she is of the opinion that the disclosure would cause serious harm to the requester's physical and/or mental health and/or well-being.
- Before the Information Officer allows, grants or facilitates access to any information and/or records, he or she may consult with the treating medical practitioner who, subject to

section 61(2) of PAIA, has been nominated by the relevant person.

- If the relevant person is:
 - under the age of 16 years, a person having parental responsibilities for the relevant person, must make the nomination referred to in section 61(1) of PAIA: or
 - incapable of managing his or her affairs, a person appointed by the court to manage those affairs must make that nomination.
- If, after the Information Officer has given access to the nominated medical practitioner and he or she (practitioner) is of the opinion that the disclosure of the information and/or record to the relevant person would be likely to cause serious harm to his or her physical and/or mental health and/or well-being, the Information Officer may only grant access to that information and/or record if he or she has been given sufficient guarantees by the requester that adequate provision has been made for such counselling or arrangements as are reasonably practicable before, during or after the disclosure of the information and/or record to limit, alleviate or avoid such harm to the relevant person.
- Before access to the information and/or record is so given to the requester, the person responsible for such counselling or arrangements must be given access to the information and/or record.
- The Information Officer may also refuse access to information and/or records in terms of any other law.

18. Access Requests and Procedures

Access Procedure

A requester is any person making a request for access to a record of, or held by, Lenmed Group.

PAIA distinguishes between two types of requesters for access to information, a Personal Requester (i.e. a data subject) and Other Requester:

- A data subject is a requester who, having provided adequate proof of identity, is seeking access to a record containing personal information about the data subject. Subject to the provisions of PAIA and POPIA, the Lenmed Group will provide the requested information, or give access to any record with regard to the data subject's personal information within a reasonable time, (at a prescribed fee, if any) in a reasonable manner and format and in a form that is generally understandable. The prescribed fee for reproduction of the

personal information requested will be charged by Lenmed Group;

- A person falling in the category of Other Requester is entitled to request access to information pertaining to third parties. However, Lenmed Group is not obliged to grant access prior to the requester fulfilling the requirements for access to information in terms of PAIA and POPIA.

A requester is entitled to request access to information, including information pertaining to third parties, but Lenmed Group is not obliged to grant such access. Apart from the fact that access to a record can be refused based on the grounds set out in paragraph 16 or 17 above, in order to successfully access information, the requester must fulfil the prerequisite requirements for access in terms of PAIA, including the payment of the fees as prescribed by PAIA.

Access Request Procedure

A requester requiring access to information held by Lenmed Group must use the prescribed form, **Form 2**, when requesting access to a record or personal information. **Form 2** is attached to this Manual as **Annexure B ("Access Request Form")** or such form as amended or updated from time to time in terms of PAIA.

The completed **Form 2** must be addressed and submitted to the **Information Officer** at the postal or physical address, or email address recorded in paragraph 5 above and pay the applicable request fee (and a deposit, if applicable).

To facilitate a timely response to requests for access to a record, all requesters should take note of the following when completing the Access Request Form:

- The Access Request Form must be completed comprehensively. Each section of the form contains instructions that should be followed to improve the likelihood of the request being granted with minimal delay being experienced;
- Proof of identity is required to authenticate the identity of the requester. Therefore, in addition to the access request form, requesters will be required to supply a copy of their identification document;
- If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request (such as a copy of the mandate authorizing the requester to act on behalf of such person) to the reasonable satisfaction of the Information Officer;
- Every applicable question must be answered. If a question does not apply "N/A" should be stated in response to that question. If there is nothing to disclose in reply to a particular

question "Nil" should be stated in response to that question;

- a detailed description of the records being requested must be provided to enable the Information Officer to identify it accurately.

The requester must provide sufficient information of the record(s) requested in order for the Information Officer to identify the record(s). The Access Request Form must be completed with enough particularity to enable the Information Officer to identify:

- The record(s) requested;
- The identity number of the requester;
- The form and manner of access required if the request is granted;
- The postal address or fax number of the requester.
- The requester must also state that he or she requires the information in order to exercise or protect a right, and clearly state the nature of the right to be exercised or protected. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.

An oral request for access to a record(s) may be made, if an individual is unable to complete the prescribed form because of illiteracy or disability. The Information Officer will assist the requester to complete the prescribed form on behalf of such requester and provide him/her with a copy of the completed form.

The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he/she must state the manner and the particulars so required.

Payment of fees

Under Section 54 of PAIA, private bodies are entitled to levy a prescribed request fee to a requester before the private body may process the request for information or records. Fees levied are published by the Minister or the Information Regulator (as the case may be) and the fees as at the date of this Manual are displayed in **Annexure A**. These may be updated from time to time and the fees that apply at the time of the request will be levied (which may not necessarily be those recorded in Annexure A).

PAIA provides for two types of fees, namely:

- A request fee, which will be a standard fee; and
- An access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

When the request is received by the Information Officer, the Information Officer will, by notice, require the requester (other than a personal requester) to pay the prescribed request fee (if any), before further processing of the request (refer to **Annexure A** of this manual).

Payment details can be obtained from the Information Officer and must be made by a direct deposit or electronic funds transfer. Proof of payment must be supplied when the Access Request Form is submitted.

The Information Officer will withhold a record until the requester has paid the fees as indicated. A requester whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure, including making arrangements to make it available in the requested form.

If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer will repay the deposit to the requester.

Request fee

An initial "request fee" is payable on submission of the Access Request Form. The prescribed fee is set out in **Annexure A** (or as amended from time to time in terms of PAIA). Note that the requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the request fee.

Access fee

If the request for access is successful, an access fee must be paid. This fee is for the search, reproduction and/or preparation of the record(s). The access fee will be calculated based on the prescribed fees set out in **Annexure A** (or as amended from time to time in terms of PAIA). Note that the requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the access fee.

Deposit

If the search for, and the preparation of, the record for disclosure would, in the opinion of the

Information Officer, require more than 6 hours, the requester may be required to pay as a deposit one third of the access fee (the fee which will be payable if the request is granted) or such deposit as may be prescribed by PAIA from time to time. Note that the requester may lodge a complaint to the Information Regulator or an application with a court against the tender or payment of the deposit. If a deposit has been paid in respect of a request for access which is subsequently refused, then the Information Officer must refund the deposit to the requester. The requester must pay the prescribed fee before any processing, or any further processing, can take place.

Notification of decision

The Information Officer will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

The 30-day period, within which the Lenmed Group has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if the information cannot reasonably be obtained within the original 30 day period. For example, the time period may be extended if the request is for a large amount of information, the request requires a level of consultation in order to act on the request which cannot reasonably be completed within the original 30 day period, or the request requires Lenmed Group to search for information held at another office of the Group.

The Information Officer will notify the requester in writing should an extension be required, indicating the period of extension and the reason for the extension. In terms of PAIA, the requester has a right to lodge a complaint to the Information Regulator or make an application with a court against the extension.

19. Remedies available when access to a record is refused

Internal remedies

Lenmed Group does have an internal appeal procedure. The decision made by the Information Officer may be appealed in accordance with the appeal procedure established by the Information Officer from time to time, if any. If no internal appeal procedure has been established by the Information Officer, the decision of the Information Officer in relation to the request will be final. Requesters who are dissatisfied with a decision of the Information Officer can, within 21 days of receipt of the decision from the Information Officer, request details of the internal appeal procedure in place at the time from the Information Officer.

Employees of the Lenmed Group can also follow the internal Grievance Procedures established by the HR Department from time to time.

Requesters who are dissatisfied with the outcome of the internal appeal procedure, if any, or with the final decision of the Information Officer where no internal appeal process is available, will be entitled to exercise the available external remedies at their disposal.

External remedies

All complaints, by a requester or a third party, can be made to the Information Regulator or a court, in the manner prescribed below.

Complaints to the Information Regulator:

The requester or third party, as the case may be, may submit a complaint in writing to the Information Regulator, within 180 days of the decision, alleging that the decision was not in compliance with the provisions of PAIA (or such other period as may be prescribed by PAIA from time to time).

The Information Regulator will investigate the complaint and reach a decision - which may include a decision to investigate, to take no further action or to refer the complaint to the Enforcement Committee established in terms of POPIA.

The Information Regulator may serve an enforcement notice confirming, amending or setting aside the impugned decision, which must be accompanied by reasons.

Application to court:

An application to court maybe brought in the ordinary course. For purposes of PAIA, any reference to an application to court includes an application to a Magistrates' Court.

20. Availability of this PAIA Manual

A copy of this PAIA Manual is available:

- on the Lenmed Group Website (www.lenmed.co.za);
- at the Lenmed Group head office for public inspection during normal business hours;
- to any person on request and on the payment of a reasonable prescribed fee; and
- to the Information Regulator on request.

A fee for a copy of this PAIA Manual, as contemplated in Annexure B of the PAIA Regulations, will be payable for each A4-size photocopy made.

21. Updating of this PAIA Manual

Lenmed Group will update this PAIA Manual on a regular basis.

22. ANNEXURE A: PRESCRIBED FEES

Please note: Lenmed Group is a registered VAT vendor under the Value Added Tax Act, 1991 and will add VAT to all the above mentioned fees.

The fees set out in this Manual are for information purposes. These prescribed fees may be amended or updated from time to time, by law or regulation.

Request Fees

Where a requester submits a request for access to information held by Lenmed Group, the request fee is payable up-front before Lenmed Group will further process the request received. The “**request fee**” payable by a requester is set out in the table below (or such adjusted amount as may be prescribed by PAIA from time to time).

Access Fees

An access fee is payable for the reproduction, search and preparation of a record, in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of PAIA or an exclusion is determined by the Minister in terms of section 54(8) of PAIA.

Deposits

Where Lenmed Group receives a request for access to information held on a person other than the requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 hours, a deposit is payable to the requester. The amount of the deposit will be equal to one-third (1/3) of the amount of the applicable Access fee.

The applicable Request and Access fees which will be payable in terms of PAIA are as follows:

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/ printed black and white of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer readable form on: <ul style="list-style-type: none"> • Flash drive (to be provided by requester) • Compact disc: <ul style="list-style-type: none"> - If provided by requester - If provided to the requestor 	R40.00 R40.00 R60.00
5.	For a Transcription of visual images per A4-size page; or For a copy of visual images	Service to be outsourced. Fee will depend on the quotation received from the service provider.
6.	Transcription of an audio record, per A4-size page or part thereof	R24.00
7.	Copy of an audio recording on: <ul style="list-style-type: none"> • Flash drive (to be provided by requestor) • Compact disc: <ul style="list-style-type: none"> - If provided by requestor If provided to requestor	R40.00 R40.00 R60.00
8.	To search and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation To not exceed a total cost of	R145.00 R435.00
9.	Deposit: if search exceeds 6 hours	One third of the amount per request, calculated in terms of items 2 to 8 above.
10.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

23. ANNEXURE B: PRESCRIBED FORM 2

FORM 2 (PAIA)

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION	
Full Names	
Identity Number	
Capacity in which request is made (when made on behalf of another person)	
Postal Address	
Street Address	
E-mail Address	
	Tel. (B): <input type="text"/>
	Facsimile: <input type="text"/>

Contact Numbers	Cellular:	
Full names of person on whose behalf request is made (<i>if applicable</i>):		
Identity Number		
Postal Address		

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	

Any further particulars of record	

TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
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	

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	

Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEEES

<p>a) <i>A request fee must be paid before the request will be considered.</i></p> <p>b) <i>You will be notified of the amount of the access fee to be paid.</i></p> <p>c) <i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i></p> <p>d) <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i></p>	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the

costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

