



Pan-African Managed Care (Pty) Ltd

Registration Number: 2008/013757/07

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. INTRODUCTION

- 1.1 This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act No.2 of 2000 ("PAIA").
- 1.2 The aim of the Manual is to assist potential Requesters to request access to information (documents, records and/or Personal Information) from Pan-African Managed Care (Pty) Ltd ("PAMC") as contemplated under PAIA.
- 1.3 The Manual may be amended from time to time and as soon as any amendments have been affected, the latest version of the Manual will be published and distributed in accordance with PAIA.
- 1.4 A Requester is invited to contact the Information Officer should he or she require any assistance in respect of the use or content of this Manual.
- 1.5 The definitions provided in this Manual are solely for the purpose of this Manual and are not to be taken as applicable to PAIA.

2. DEFINITIONS

The following words or expressions will bear the following meanings in this Manual –

- 2.1 **"Data Subject"** means natural or juristic person to whom Personal Information relates;
- 2.2 **"Dependant"** means the spouse or partner, dependent children or other members of immediate family in respect of whom the Member is liable for family care and support; or any other person who, under the Pan-African Managed Care (Pty) Ltd medical scheme rules is recognised as a dependent of a member, or the immediate family of a member other than the member's spouse or partner, who is not in receipt of a regular remuneration of more than the maximum social pension per month;
- 2.3 **"Deputy Information Officer"** means Pan-African Managed Care (Pty) Ltd.'s designated deputy information officer described in paragraph 4 of this Manual.
- 2.4 **"Designated Service Provider"** means a health care provider or group of health care providers selected and contracted by the medical scheme as its preferred service provider or providers to provide relevant health care services to its Members.
- 2.5 **"Employee"** means any person who works for, or provides services to, or on behalf of Pan-African Managed Care (Pty) Ltd and receives or is entitled to receive remuneration.
- 2.6 **"Information Officer"** means Pan-African Managed Care (Pty) Ltd.'s designated information officer described in paragraph 4 of this Manual.
- 2.7 **"Information Regulator"** shall bear the meaning ascribed thereto in POPIA; 4 2.7 "Manual" means this manual, together with all annexures thereto as amended and made available at the offices of Pan-African Managed Care (Pty) Ltd from time to time.
- 2.8 **"Medical Schemes Act"** means the Medical Schemes Act No. 131 of 1998, together with any regulations published thereunder.
- 2.9 **"Member"** means any person who is admitted as a Member of Pan-African Managed Care (Pty) Ltd in terms of its medical scheme rules.

- 2.10 **"PAIA"** means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder.
- 2.11 **"POPIA"** means the Protection of Personal Information Act No. 4 of 2013, together with any regulations published thereunder.
- 2.12 **"Personal Information"** has the meaning ascribed thereto under POPIA.
- 2.13 **"Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –
- 2.13.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use.
 - 2.13.2 dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or
 - 2.13.3 merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, "Process" has a corresponding meaning.
- 2.14 **"Requester"** means any person or entity (including any Data Subject) requesting access to a record that is under the control of Pan-African Managed Care (Pty) Ltd; and
- 2.15 **"Third-Party"** means any independent contractor, agent, consultant, sub-contractor or other representative of Pan-African Managed Care (Pty) Ltd.

3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 3.2 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.
- 3.3 know the description of the records of the body which are available in accordance with any other legislation.
- 3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 3.6 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.
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto.
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied.

- 3.9 know if the body 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
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PAN-AFRICAN MANAGED CARE (PTY) LTD

(Information required under section 51(1)(a) of PAIA)

4.1 Chief Information Officer

Name: Tjaart Nicolaas van der Walt
Tel: 012 741 5140
Email: nic@pamc.co.za
Fax number: 086 2388 343

4.2 Deputy Information Officer

Name: Bryn Anne Small
Tel: 012 741 5136
Email: bryn@pamc.co.za
Fax Number: Not applicable

4.3 Access to information general contacts

Email: POPI@pamc.co.za

4.4 Office

Postal Address: Postnet Suite 341
Private Bag X2
Raslouw
0109

Physical Address: 262 Rose Avenue
River Falls Office Park
1 Marula Building
Centurion
0157

Telephone: 012 741 5101

Email: popi@pamc.co.za

Website: www.pamc.co.za

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

(Information provided in terms of section 51(1) of PAIA)

- 5.1 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 in terms of PAIA, the public body must be acting in the public interest.

- 5.2 Requests in terms of PAIA shall be made in accordance with the prescribed procedures, and at the prescribed fees.
- 5.3 A guide on how to use PAIA is required to be compiled by the Information Regulator and when same is available, will be accessible (in various official languages) on the Information Regulator's website or you may request a copy of the guide from us by contacting our Information Officer (Please refer to section 4 of this manual). You may also direct any queries to:

The Information Regulator of South Africa

Physical Address: JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

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

Email: infoereg@justice.gov.za or
PAIAComplaints.IR@justice.gov.za or
POPIAComplaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/infoereg/index.html>

Telephone: 012 406 4818

Fax: 086 500 3351

6. OVERVIEW OF THE STRUCTURE AND FUNCTIONS OF PAMC

- 6.1 Pan-African Managed Care (Pty) Ltd is a private company register with CIPC in terms of the Companies Act with registration number 2008/013757/07.
- 6.2 PAMC is a healthcare management company.
- 6.3 The object of the company is to assist medical aid to administrate there claims of patients.
- 6.4 PAMC provides managed care administration services in accordance with medical scheme benefits.
- 6.5 PAMC has entered into fixed fee contracts with a number of medical aids and insurance clients.

7. PAMC'S PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

(Information required under section 51(1)(c) of PAIA)

7.1 Purpose of PAMC's Processing of Personal Information

- 7.1.1 PAMC will process Personal Information only in ways that are for, or compatible with, the business purposes for which the data was collected or that are subsequently authorised by the relevant Data Subject.

- 7.1.2 PAMC will retain Personal Information only for as long as is necessary to accomplish PAMC's legitimate business purposes or for as long as may be permitted or required by applicable law.
- 7.1.3 We use the Personal Information we collect to (i) serve our clients (Medical Aid Schemes and Insurance clients) their Members, their Dependants, and Participating healthcare practitioner groups, and market and promote our products or services; and (ii) generally to enable us operate and manage our normal operations and these purposes include the following non-exhaustive purposes –
 - 7.1.3.1 generally, for the purposes of providing its services as a manage care administrator to medical schemes and their Members and Dependants, as per the rules of the medical scheme. This includes administration of the medical scheme, case management and client liaison.
 - 7.1.3.2 for the purposes of providing its services as healthcare administrator, including the administration of claims, sending of remittances.
 - 7.1.3.3 for purposes of onboarding suppliers, service providers or Designated Service Providers as approved suppliers/service providers of PAMC. For this purpose, PAMC will also Process a service provider's/supplier's Personal Information for purposes of performing the necessary due diligence checks.
 - 7.1.3.4 in order to conduct due diligence processes on, inter alia, potential service providers, counterparties and/or participants in PAMC's corporate social responsibility initiatives.
 - 7.1.3.5 in order to comply with obligations imposed on PAMC under the Based Black Economic Empowerment Act, No. 53 of 2003 ("BEE Act") read together with the Department of Trade and Industry's Codes of Good Practice on Broad-Based Black Economic Empowerment published in terms of Government Gazette No. 36928 on 11 October 2013 under section 9(1) of the BEE Act, as amended or reissued from time to time;
 - 7.1.3.6 in order to ensure that the relevant financial and ESG (Environmental, Social and Governance) obligations are complied with (which obligations flow from the relevant legal agreements).
 - 7.1.3.7 generally, for procurement and supply purposes;
 - 7.1.3.8 for purposes of monitoring the use of PAMC's electronic systems and online platforms by Data Subjects. PAMC will process the Data Subject's Personal Information to facilitate this.
 - 7.1.3.9 for purposes of preventing, discovering and investigating violations of this Policy, the applicable law and other PAMC policies;
 - 7.1.3.10 in connection with the execution of payment processing functions, including payment of PAMC's suppliers'/service providers' invoices;
 - 7.1.3.11 for employment-related purposes such as recruiting staff, administering payroll, background checks, etc.;
 - 7.1.3.12 in connection with internal audit purposes (i.e. ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);

- 7.1.3.13 in connection with external audit purposes. For this purpose, PAMC engages external service providers and, in so doing, shares Personal Information of the Data Subjects with third parties;
- 7.1.3.14 in order to address inquiries or complaints in respect of PAMC's services or functions;
- 7.1.3.15 for the purposes of engaging in corporate social responsibility initiatives;
- 7.1.3.16 for such other purposes to which the Data Subject may consent from time to time;
- 7.1.3.17 for such other purposes as authorised in terms of applicable law; and
- 7.1.3.18 to comply with any applicable law

7.2 PAMC will not use the Personal Information which we collect for any purposes other than those purposes specified in paragraph 7.1.3 above.

7.3 Planned Transborder Flows of Personal Information

In carrying out any cross-border transfers, PAMC shall adhere to the provisions of POPIA.

7.4 Information Security Measures

- 7.4.1 The security and confidentiality of Personal Information is important to PAMC. We have implemented reasonable technical, administrative, and physical security measures to protect Personal Information from unauthorised access or disclosure and improper use. 3
- 7.4.2 We are committed to ensuring that our security measures which protect your Personal Information are continuously reviewed and updated where necessary.
- 7.4.3 In Processing any Personal Information, PAMC shall comply with the following minimum technical and organisational security requirements.
 - 7.4.3.1.1 Physical Access – Access to Personal Information is restricted in our offices (in senior Employees' offices), under lock and key, and only to those Employees who need the Personal Information to perform a specific job / task.
 - 7.4.3.1.2 Employee Training – All Employees with access to Personal Information are kept up to-date on our security and privacy practices. After a new policy is added, these Employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for the Personal Information of all Data Subjects.
 - 7.4.3.1.3 Unique User Identification – Employees each have a unique user ID assigned to them, subject to strict confidentiality undertakings in terms of PAMC's password, access control and confidentiality policies.
 - 7.4.3.1.4 Passwords – PAMC shall ensure that there are passwords required for any access to Personal Information in line with its password policy.
 - 7.4.3.1.5 Physical access and privileges – PAMC ensures that access to Personal Information is limited to Employees on a "need to know" basis, and

PAMC Employees are required to strictly utilise their unique user ID and applicable passwords to access same.

7.4.3.1.6 Systems Review – PAMC conducts regular reviews of its technical and organisational security measure system in order to ensure that all of the above security measures are functioning effectively and applied consistently.

7.4.3.1.7 Technological measures –

- Passwords force user to regular change their password please refer to the Password Policy
- Encrypting removable devices used for taking personal information out of the office,
- Access to information is limited and based on an employee's job description.
- Penetration testing being done by an independent company twice a year.
- All Servers and our Firewalls are regularly patched. This is backed up by a System call WSUS, which helps manage this matter for multiple Products, including End user machines.
- PAMC use Fortinet Firewalls, which is an industry leader. This Firewall is fully patched, and we use it to supply FortiNet VPNs to our WFH staff and to establish our WAN connections. The state of the Firewall is reviewed Daily.
- Additional reports are generated to detect large scale user account changes.
- Administrators in the Organisation utilize 2FA.
- Antivirus, Ransomware and Phishing protection is based on multiple layers:
 1. **Email protection service:** Phishing, Zero-day Malware & Ransomware, Account Takeover / Insider threat, Data Leak Protection, Shadow it Prevention, URL Click time protection.
 2. **Active Firewall** scanning of all email.
 3. **End User:** Endpoint Compliance, Anti-ransomware, Zer-Day Phishing, Advance Threat Prevention, Endpoint detection and Response (EDR), Threat Emulation & - Extraction.

8. DESCRIPTION OF THE RECORDS OF PAN-AFRICAN MANAGED CARE (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

(Information required under section 51(1)(b)(iii) of PAIA)

8.1 Records are kept in accordance with legislation applicable to PAMC, which includes but is not limited to, the following:

- a) Basic Conditions of Employment Act 75 of 1997;
- b) Broad-Based Black Economic Empowerment Act, No. 53 of 2003
- c) Companies Act 71 of 2008;
- d) Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- e) Constitution of the Republic of South Africa, 1996
- f) Consumer Protection Act 68 of 2008
- g) Credit Agreements Act No. 75 of 1980;
- h) Copyright Act 98 of 1987
- i) Council for Medical Schemes Levies Act, No. 58 of 2000 9
- j) Dental Technicians Act 19 of 1979
- k) Electronic Communications and Transaction Act 25 of 2002;
- l) Employment Equity Act 55 of 1998;
- m) Health Professions Act 56 of 1974;
- n) Income Tax Act 58 of 1962;

- o) Insolvency Act 24 of 1936
- p) Labour Relations Act 66 of 1995;
- q) Medical Schemes Act 131 of 1998;
- r) Medicines and Related Substance Act 101 of 1965;
- s) Mental Health Care Act 17 of 2002
- t) National Credit Act 34 of 2005
- u) National Health Act 61 of 2003;
- v) Nursing Act 33 of 2005;
- w) Occupational Health and Safety Act 85 of 1993;
- x) Pension Funds Act 24 of 1956
- y) Promotion of Access to Information Act 2 of 2000;
- z) Protection of Personal Information Act 4 of 2013;
- aa) Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- bb) Road Accident Fund Act 56 of 1996;
- cc) Short term Insurance Act No.53 of 1998;
- dd) Skills Development Levies Act 9 of 1999;
- ee) Skills Development Act 97 of 1998;
- ff) Tax Administration Act 28 of 2011
- gg) Tax on Retirement Funds Act 38 of 1996
 - hh) Unemployment Contributions Act 4 of 2002;
 - ii) Unemployment Insurance Act 63 of 2001; and
 - jj) Value Added Tax Act 89 of 1991.

8.2 Records kept in terms of the above legislation may, in certain instances (and insofar as the information contained therein is of a public nature) be available for inspection without a person having to request access thereto in terms of PAIA.

9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PAN-AFRICAN MANAGED CARE (PTY) LTD:

The company holds the following categories of records:

| Categories of Records | Document Type |
|--|--|
| Company records | Documents pertaining to personal liability company as required by the Companies Act 71 of 2008, including, but not limited to <ul style="list-style-type: none"> - Incorporation documents - Memorandum of incorporation - Forms and registers of directors and shareholders - Share register - Company rules - Statutory registers & Minutes of meetings - Accreditation Certificate - Licenses - Vision and mission statement - Resolutions and shareholders' agreements. - BBEEE Certificate |
| Records relating to the registration of employees working at the company | <ul style="list-style-type: none"> - Registration certificates at the HPCSA, SAICA, SAIPA, OHASA and related documents; - Proof of payment of registration and annual fees of the professional bodies. |
| Human Resource records | <ul style="list-style-type: none"> - Employment contracts; - Conditions of employment and work place - Policies such as leave policies; - Employment equity & skills development plans and records - Salary register; - Performance Management records; |

| Categories of Records | Document Type |
|--|---|
| | <ul style="list-style-type: none"> - Documents related to disciplinary proceedings, arbitration awards, - CCMA (Commission for Conciliation, Mediation and Arbitration) and other legal cases; - Related tax records and information pertaining to employees; - Contracted staff list - Retirement staff list - Recruitment records - Job Descriptions |
| Retirement fund | <ul style="list-style-type: none"> - Retirement fund contributions - Retirement fund rules; - Records relevant to retirement fund members, Including payment of contributions. |
| Financial records | <ul style="list-style-type: none"> - Annual Financial Statements, including director's reports; auditor's reports; - Details of auditors - Accounting Records; - Source documents - Bank statements; - Invoices & Credit notes, Statements, - Receipts and related documents. - Management accounts - Budgets |
| Tax & VAT records | <ul style="list-style-type: none"> - Income Tax returns & documents relating to income tax, - VAT and dividend tax, - Including payment made and returns filed, and - VAT registration. - Letters of Good standing |
| Medical Scheme - Members records | <ul style="list-style-type: none"> - Records are kept in respect of all members: - Medical history and treatments. - Dependant information - Claim records |
| Health and Safety records | <ul style="list-style-type: none"> - Evacuation plan; information related to the Health and Safety Committee/Officer; - Health and safety incident report. |
| Records of the property (movable or immovable) | <ul style="list-style-type: none"> - Lease agreement; - Assets register; - Delivery Notes and orders, - Sale agreements; - Purchase agreement - Socio Economic Development agreements - Software programmes - Software licences - IT policies and procedures - Software records |
| Other agreements | <ul style="list-style-type: none"> - Managed care and medical scheme agreements; - Information Technology agreements (software & hardware); - Agreements with contractors and suppliers. |
| Records relating to legal processes | <ul style="list-style-type: none"> - Complaints, - Pleadings, briefs and other documents pertaining to any actual pending or threatened litigation, arbitration or investigation; - Settlement agreements; - Legal opinions/advice. |
| Operations records | <ul style="list-style-type: none"> - Standard Operating Procedures - BEE work done |
| Customers / Clients | <ul style="list-style-type: none"> - Name - Address |

| Categories of Records | Document Type |
|-----------------------|---|
| | <ul style="list-style-type: none"> - Contact details - Company registration numbers - VAT numbers or identity numbers - Bank details - Any other details required for business purposes. |

10. PROCESSING OF PERSONAL INFORMATION

10.1 Description of the categories of Data Subjects and of the information or categories of information relating thereto

- The company holds the categories of records and personal information in respect of the categories of data subjects specified below.
- The potential recipients of the personal information proceeds by the company are also specified.
- Information and records are only disclosed as may be required in terms of the law or otherwise with the consent of the relevant data subjects.

| Categories of Data Subjects | Categories of Records | Categories of personal information | Potential recipient of the personal information |
|-------------------------------------|---|---|--|
| Directors, shareholders & employees | <ul style="list-style-type: none"> - Proof of registration at and the payment of fees to HPCSA, SAICA, SAIPA and OHASA; - Employment contracts, records and policies; - Insurance policies; - Complaints; - Disciplinary and court proceedings; - Employment equity and skills development plans and records; - Salary and payroll records, - Leave records, - Tax records, including PAYE, UIF and SDL returns and related records; - Correspondence with insurers and other persons/bodies; - Training events, certificates and records. | <ul style="list-style-type: none"> - Names and surnames; - Contact details; e.g. address, telephone numbers, e-mail addresses; identity numbers/dates of birth ; - Race; - Gender; - Nationality, - Qualifications; - Professional bodies registration numbers; - Registered profession; Category of registration, - Employment history & information; position held; - Banking details, - Criminal behaviour & history; - Correspondence; - Tax numbers, returns and certificates; - Leave periods; - Remuneration; | <ul style="list-style-type: none"> - SARS; - Relevant statutory bodies such as the HPSCA, SAICA, SAIPA, OHASA and Council for Medical Schemes (CMS) - Board of Healthcare Funders (BHF); - Companies and Intellectual Property Commission (CIPS); - Contractors & Vendors; Relevant public bodies, including government departments e.g. Compensation Commissioner, Road Accident Fund (RAF), UIF, Department of Labour; - Banks; - Professional societies; - Vetting agencies |

| Categories of Data Subjects | Categories of Records | Categories of personal information | Potential recipient of the personal information |
|---|---|---|---|
| | | <ul style="list-style-type: none"> - Employment Benefits; - Absenteeism information, - Next of kin details | |
| Other contractors, vendors & suppliers, e.g. BHF, IT vendors, claims switching companies, auditors, legal counsel, consultants, debt collectors | <ul style="list-style-type: none"> - Agreements with contractors, vendors and suppliers; - Non-Disclosure Agreements; - Debt Collection Agreements; - Legal opinions and advice; - Invoices; - Correspondence | <ul style="list-style-type: none"> - Names & Surnames; - Company names; - Relevant staff details; Contact details e.g. address, telephone numbers, e-mail addresses, - Opinions; - Correspondence; - Track records; - Price structures; - Financial Agreements | <ul style="list-style-type: none"> - Banks - Auditors - Legal practitioners |
| Insurers | <ul style="list-style-type: none"> - Insurance policies - Payment of premiums - Claims records & related documents | <ul style="list-style-type: none"> - Names & contact details e.g. addresses telephone numbers, email, addresses - Premiums | <ul style="list-style-type: none"> - Auditors - Legal practitioners - Relevant public bodies |
| Medical aid members | <ul style="list-style-type: none"> - Member records including medical records - Invoice & payment records - Correspondence | <ul style="list-style-type: none"> - Names & contact details e.g. addresses telephone numbers, email, addresses - Identity numbers / dates of birth - Race - Gender - Nationality - Medical Scheme - Medical Scheme options & dependent status - Medical history including Diagnoses / Suspected diagnoses, procedures preformed - Diagnoses & procedure codes - Radiological images (X-rays, scans etc.) & reports | <ul style="list-style-type: none"> - Medical schemes - Medical scheme administrators - Other managed care organisations - Insurers - Practitioners to whom the patients are referred - Governmental bodies e.g. CMS when responding to complaints - Hospitals - Other relevant treating health care practitioners |

| Categories of Data Subjects | Categories of Records | Categories of personal information | Potential recipient of the personal information |
|---|---|--|---|
| | | <ul style="list-style-type: none"> - Referral Notes - Complaints lodge - Correspondence | |
| Medical scheme / Insurance companies | <ul style="list-style-type: none"> - Claims - Remittance advises - Contracts - Correspondence - Scheme rules - Policy provisions | <ul style="list-style-type: none"> - Contact details e.g. addresses, telephone numbers, email addresses | <ul style="list-style-type: none"> - Practitioners |
| Hospitals | <ul style="list-style-type: none"> - Correspondence | <ul style="list-style-type: none"> - Names, contact details, addresses, telephone numbers, email addresses - Practice Code numbers of hospitals | <ul style="list-style-type: none"> - Medical Schemes - Governmental bodies e.g. CMS when responding to complaints |
| Public Bodies <ul style="list-style-type: none"> - Department of Health - RAF - COIDA - UIF - CMS Statutory Bodies <ul style="list-style-type: none"> - HPCSA | <ul style="list-style-type: none"> - Complaints submitted to statutory bodies & related documents - Correspondence - Newsletter & circulars issued by these bodies & councils - Payment of fees | <ul style="list-style-type: none"> - Names, contact details, addresses, telephone numbers, email addresses - Office bearers - Fee structure | <ul style="list-style-type: none"> - Medical Schemes - Medical aid members |
| Customers / Clients | <ul style="list-style-type: none"> - Agreements - Invoices & Credit Notes - Statements | <ul style="list-style-type: none"> - Name - Address - Contact details - Company registration numbers - VAT numbers or identity numbers - Bank details - Any other details required for business purposes. | <ul style="list-style-type: none"> - Auditors - Legal practitioners - Practitioners - CMS |

10.2 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 |
|---|---|
| Directors, shareholders & employees - Identity number and names, for criminal checks | South African Police Services |
| Directors, shareholders & employees - Qualifications, for qualification verifications | South African Qualifications Authority |

11. REQUEST PROCEDURES

11.1 Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA.

11.2 Form of request

11.2.1 The Requester must use the prescribed form to make the request for access to a record. This must be made to the Information Officer at the address or electronic mail address of the body concerned (see s 53(1) of PAIA).

11.2.2 The Requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requester. The Requester should also indicate which form of access is required and specify a postal address, fax number in the Republic or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed (see s 53(2)(a) and (b) and (c) and (e) of PAIA).

11.2.3 The Requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right (see s 53(2)(d) of PAIA).

11.2.4 If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of the private body (See s 53(2)(f) of PAIA).

11.2.5 Form: Request for Access to Records (Regulation 7)

<https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

11.3 Fees

11.3.1 Request fees:

11.3.1.1 The Information Officer must by notice require the Requester to pay the prescribed request fee (if any) before further processing the request (see s 54(1) of PAIA).

11.3.1.2 The fee that the Requester must pay to a private body is [R50]. The Requester may lodge an application to the court against the tender or payment of the request fee (See section 54(3)(b) of PAIA).

11.3.2 Access fees and fees for reproduction:

11.3.2.1 If access to a record/s is granted by PAMC, the Requester may be required to pay an access fee for the search for and preparation of the records and for reproduction of the record/s. (See section 54(6) of PAIA)

11.3.2.2 The access fees which apply are set out below. PAMC can refuse access until such access fees have been paid. (See section 54(5) of PAIA)

| Reproduction | Fee (ZAR) |
|--|--|
| Photocopy of an A4-size page or part thereof provided in hard copy or via scanned copy sent via email | R1.10 per page |
| Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form | R0.75 per page |
| A copy of, in a computer readable form on: | |
| - Flash Drive (To be provided by requestor) | R40.00 |
| - Compact disc | |
| - • If provided by requestor | R40.00 |
| - • If provided to the requestor | R60.00 |
| Transcription of visual images on an A4-size page or part thereof | Service to be outsourced. Will depend on the quotation of the service provider |
| Copy of visual images | |
| Transcription of an audio record on an A4-size page or part thereof: | R24.00 |
| Copy of an audio record | |
| Flash drive | |
| - • To be provided by requestor | R40.00 |
| Compact disc | |
| - • If provided by requestor | R40.00 |
| - • If provided to the requestor | R60.00 |
| Postage, e-mail or any other electronic transfer: | Actual costs |

11.4 Decision on request

11.4.1 After the Information Officer has made a decision on the request, the Requester will be notified using the required form. (See section 56(1)(b) of PAIA)

11.4.2 If the request is granted, then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure (see s 54(6) of PAIA).

11.5 Form: Outcome of request and of fees payable [Regulation 8]

<https://infoeregulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

12. TIMELINES FOR CONSIDERATION OF A REQUEST

(See section 56 and 57 of PAIA)

12.1 Requests for access by a Requester will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is necessary. Such considerations include –

12.1.1 where the request is for a large number of records or requires a search through a large number of records (including where records that have been archived electronically need to be restored);

12.1.2 where the request requires a search for records in, or collection of such records from, the office of PAMC located far away from Centurion

12.1.3 consultation among departments of PAMC or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original 30-day period;

- 12.1.4 more than one of the circumstances contemplated in paragraphs 13.1.1, 13.1.2 and 13.1.3, exist in respect of the request making compliance with the original period not reasonably possible; or³
- 12.1.5 the Requester consents in writing to such extension.
- 12.2 If an extension is necessary, you will be notified with reasons for the extension. If the Information Officer fails to communicate a decision on a request, such a request is then deemed to have been refused.

13. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

(See chapter 4 of Part 3 of PAIA)

13.1 Requests for access by a Requester must be refused by the Information Officer if –

- 13.1.1 the disclosure would involve the unreasonable disclosure of personal information about a third party (natural person), including a deceased individual (See section 63 of PAIA);
- 13.1.2 the record contains (a) trade secrets of a third party, (b) financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party, or (c) information supplied in confidence by a third party the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations; or to prejudice that third party in commercial competition (See section 64 of PAIA);
- 13.1.3 the disclosure of the record would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement (See section 65 of PAIA);
- 13.1.4 the disclosure could reasonably be expected to endanger the life or physical safety of an individual (see section 66(a) of PAIA);
- 13.1.5 the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege (See section 67 of PAIA); or the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose: (a) the third party; (b) a person that is or will be carrying out the research on behalf of the third party; or (c) the subject matter of the research, to serious disadvantage (See section 69 of PAIA).

13.2 Requests for access by a Requester may be refused by the Information Officer if –

- 13.2.1 the disclosure would be likely to prejudice or impair: (i) the security of: (aa) a building, structure or system, including, but not limited to, a computer or communication system; (bb) a means of transport; or (cc) any other property; or (ii) methods, systems, plans or procedures for the protection of: (aa) an individual in accordance with a witness protection scheme; (bb) the safety of the public, or any part of the public; or (cc) the security of property contemplated in subparagraph (i) (aa), (bb) or (cc) (See section 66(b));
- 13.2.2 the record:
 - a) contains trade secrets of PAMC.
 - b) contains financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of PAMC;
 - c) contains information, the disclosure of which could reasonably be expected:
 - i. to put PAMC at a disadvantage in contractual or other negotiations; or
 - ii. to prejudice PAMC in commercial competition; or

- d) is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by PAMC, except insofar as it is required to give access to a record to which access is granted in terms of PAIA; (See section 68(1) of PAIA) or

13.2.3 the record contains information about research being or to be carried out by or on behalf of PAMC, the disclosure of which would be likely to expose: (a) PAMC; (b) a person that is or will be carrying out the research on behalf of PAMC; or (c) the subject matter of the research, to serious disadvantage. (See section 69(2) of PAIA)

14. REMEDIES AVAILABLE TO A REQUESTER O REFUSAL OF ACCESS

14.1 PAMC does not have any internal appeal procedures that may be followed once a request to access information has been refused.

14.2 The decision of the Information Officer or deputy information officer is final.

14.3 If you are not satisfied with the outcome of your request, you are entitled to apply to a court of competent jurisdiction to take the matter further. (See section 78 of PAIA)

15. OTHER INFORMATION HELD BY PAMC AS PRESCRIBED

(Other information as may be prescribed under section 51(1)(a)(ii))

The Minister of Justice and Constitutional Development has to date not made any regulations regarding disclosure of other information.

16. AVAILABILITY OF THE MANUAL

(Availability of Manual under section 51(3))

16.1 This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of PAMC and on the PAMC website at <https://www.pamc.co.za/>. Copies of the Manual may be made, subject to the prescribed fees.

17. THE MANUAL WILL BE MADE AVAILABLE TO THE INFORMATION REGULATOR UPON REQUEST. PRESCRIBED FORMS AND FEE STRUCTURE

(Prescribed forms and fee structure in respect of private bodies)

The forms prescribed under PAIA are available from the Government Gazette 23119, RG 7278, Government Notice R187, 15 February 2002 under Part III of Annexure A, or at the website of the Department of Justice and Constitutional Development at <https://www.justice.gov.za/paia/paia.htm> under "Forms". The fee structure prescribed under PAIA is available from the Government Gazette 23119, RG 7278, Government Notice R187, 15 February 2002, or at the website of the Department of Justice and Constitutional Development at <https://www.justice.gov.za/paia/paia-faq.htm> under "Request for Records of Private Body".

18. UPDATING OF THE MANUAL

The deputy information officer of a Pan-African Managed Care (Pty) Ltd will on a regular basis update this manual.

Issued by

A handwritten signature in black ink, appearing to read 'TN van der Walt', written in a cursive style.

**TN van der Walt
Chief Executive Officer**