

HealthRad (Pty) Ltd

PAIA Manual

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1. INTRODUCTION TO HEALTHRAD

HealthRad is a private company registered under the company laws of South Africa with registration number 2009/002075/07. HealthRad provides software, information technology (“IT”) and technical support as well as billing and accounting solutions to its clients in the medical imaging industry.

2. CONTACT DETAILS

Executive Officer: Dr L Muth
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Telephone Number: +27 12 997 4548
Email address: info@healthrad.co.za
Website address: www.healthrad.co.za

3. INFORMATION OFFICER

Name: Ms E Botha
Contact number: +27 (0) 12 997 4548
Email address: euline@healthrad.co.za

4. GUIDE OF THE INFORMATION REGULATOR

The Information Regulator compiled a Guide, in terms of Section 10 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”), to assist persons wishing to exercise their rights

in terms of this Act. This Guide contains, amongst others, the following information:

- The purpose of PAIA;
- The manner, form and costs of a request for access to information held by a body;
- Legal remedies when access to information is denied;
- Assistance that the Information Regulator can provide;
- Mechanisms to obtain the contact details of Information Officers; and
- Relevant legislation.

The Guide is available in all the official languages on the website (<https://www.inforegulator.org.za/>) of the Information Regulator or can be obtained from the Information Regulator at:

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017

Email address: enquiries@inforegulator.org.za

Complaints: PAIAComplaints@inforegulator.org.za

The Guide can also be obtained upon request from the Information Officer of the company. A copy of the Guide is available for public inspection during normal office hours at the company.

5. RECORDS HELD BY HEALTHRAD

HealthRad holds the following categories of records:

(a) **Company records:**

Documents related to the establishment of the company, its incorporation, its directors and shareholders as required in terms of the Companies Act 71 of 2008, governance and other related documents.

(b) **Client records:**

Agreements and related information, including clients' records required to perform the client agreements.

(c) **Employment records:**

Recruitment records, employment contracts, work place policies, skills development plans and training records, salary register, relevant tax records, leave records and

related documentation.

(d) Health and safety records:

Evacuation plan; health and safety incident reports.

(e) Financial records:

Financial statements; auditors' reports; accounting records; bank statements; invoices, statements and receipts; VAT records; tax returns and related documentation.

(f) Records related to assets:

Asset register; sale and purchase agreements; and related records.

(g) Agreements:

Agreements and related documentation with clients, consultants, suppliers and vendors.

(h) Public and private body (e.g., medical schemes) records:

Official documents published.

(i) Legal records:

Records related to legal advice and proceedings.

(j) Insurance records:

Policies and related records; claims and payment records.

6. INFORMATION AVAILABLE IN TERMS OF LEGISLATION

HealthRad holds records as may be required in terms of the legislation listed below subject to the specific protection offered by these laws.

Applicable Legislation	Category of Records
Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995	Employment contracts and related documentation
Companies Act 71 of 2008	Memorandum of Incorporation / Articles of Association and other statutory records

Disaster Management Act 57 of 2002	COVID-19 screening records
Electronic Communications and Transactions Act 25 of 2002	Proof of electronic transactions
Employment Equity Act 55 of 1998	Employment equity reports
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Employees' tax-related information and payments made to directors, vendors, service providers and suppliers
Occupational Health and Safety Act 85 of 1993 and Compensation for Occupational Injuries and Diseases Act 130 of 1993	Health and safety incidents; ergonomics records; claims and records related to treatment of occupational diseases and injuries
Promotion of Access to Information Act 2 of 2000	PAIA Manual and PAIA Guide
Protection of Personal Information Act 4 of 2013	PAIA Manual and policies related to the protection of personal information, including a record-keeping policy
Skills Development Levies Act 9 of 1999 and Skills Development Act 97 of 1998	Records related to payment of levies and skills development reports
Unemployment Contributions Act 4 of 2002 and Unemployment Insurance Act 63 of 2001	Records related to payment of UIF contributions and relevant employee records
Value Added Tax Act 89 of 1991	VAT records

7. RECORDS AUTOMATICALLY AVAILABLE

The information on the website of HealthRad is automatically available without having to request access by completing Form 2. Access and usage of the information on the website are subject to the Website Terms and Conditions as well as the Privacy Policy of HealthRad.

8. PURPOSE OF PROCESSING PERSONAL INFORMATION

HealthRad processes personal information of data subjects for the following purposes:

- to fulfil the function of its business, which is to provide software, IT and technical support as well as billing and accounting solutions for its clients;
- for organisational and governance purposes;
- for talent management;
- for marketing purposes;
- for communication purposes;
- to perform agreements with its clients;
- to engage with funders on behalf of clients;
- for procurement;
- for historical, statistical and research purposes;
- for enforcement of its rights; and
- any other lawful purpose related to its business.

9. DATA SUBJECTS, THEIR PERSONAL INFORMATION AND POTENTIAL RECIPIENTS OF INFORMATION

HealthRad holds the personal information in respect of the categories of data subjects specified below as may be relevant in the circumstances. The potential recipients of this information are also specified. Information and records are only disclosed to recipients as may be necessary in the circumstances and authorised in terms of the law or otherwise with the consent of the relevant data subject.

(a) Clients

Categories of personal information:

Names, addresses and contact details; names, surnames and contact details of relevant officers / employees / contact persons; information supplied during contracting process; information included in agreements; payment-related information; clients' data subjects' personal information required in terms of agreements; VAT numbers; and correspondence.

Potential Recipients:

Directors and relevant employees; South African Revenue Service ("SARS"); funders; relevant suppliers and vendors of HealthRad; recipients identified by / agreed with clients; banks; legal and professional advisers; insurers; law enforcement structures and auditors.

(b) Employees**Categories of personal information:**

Full names and surnames; titles; contact details; addresses; identity numbers; gender; place of birth; nationality; qualifications; registered professions; employment-related information; positions and job descriptions; car registration numbers; relevant health information; references; other information included in curriculum vitae (“CV”); COVID-19 screening information; health and safety-related incidents; leave records; remuneration; employment benefits; absenteeism information; bank details; tax numbers and related tax information; next-of-kin and dependant details; and correspondence.

Potential Recipients:

Directors and relevant employees; clients; relevant statutory and other public bodies (e.g., SARS); medical schemes; vendors and suppliers; banks; members of the public (through the website); next-of-kin / dependants; legal and professional advisers; insurers; law enforcement structures; auditors and executors of estates.

(c) Employees’ Next-of-Kin**Categories of personal information:**

Names and surnames; and contact details.

Potential Recipients:

Directors and relevant employees; and legal and professional advisers.

(d) Job Applicants**Categories of personal information:**

Full names and surnames; titles; contact details; identity numbers; age; gender; nationality; qualifications; registered professions; employment history and related information; relevant health information; COVID-19 screening information; information included in CVs; interview notes; references; and correspondence.

Potential Recipients:

Directors and relevant employees; legal and professional advisers; law enforcement structures and auditors.

(e) Visitors

Categories of personal information:

Full names and surnames; contact details and COVID-19 screening information.

Potential Recipients:

Directors and relevant employees; legal and professional advisers; relevant public bodies; law enforcement structures and auditors.

(f) Vendors and Suppliers

Categories of personal information:

Names and surnames; organisation names, addresses and contact details; relevant employees' / office bearers' / contact persons' details; contact details; website addresses; opinions; correspondence; COVID-19 screening information of visitors to the business; market information; price structures; financial arrangements; VAT numbers, BBBEE information; information included in agreements; and correspondence.

Potential Recipients:

Directors and relevant employees; banks; auditors; legal and professional advisers; members of the public (through the website); law enforcement structures; and relevant other HealthRad vendors and suppliers.

(g) Insurers

Categories of personal information:

Names and contact details; premiums; benefits and correspondence.

Potential Recipients:

Directors and relevant employees; auditors; legal and professional advisers; law enforcement structures and relevant other HealthRad vendors and suppliers.

(h) Public and private bodies (e.g., funders)

Categories of personal information:

Names and contact details of body and its office bearers / employees; information published;

and correspondence.

Potential Recipients:

Directors and relevant employees; legal and professional advisers; auditors; public; law enforcement structures and relevant other HealthRad vendors and suppliers.

10. PERSONAL INFORMATION SENT ACROSS THE BORDERS OF THE REPUBLIC OF SOUTH AFRICA

HealthRad is not planning to send any personal information about any data subject to any other third party in a foreign country. Should this be required, relevant data subject consent will be obtained, if required, and transfers of such information will occur in accordance with the requirements of the law.

The practice stores electronic information, including personal information of data subjects, in the 'cloud,' which may be based outside of South Africa. Due care is taken in the selection of appropriate 'cloud' service providers to ensure compliance with the law and to protect the privacy of data subjects. The practice is not planning to send any personal information about any data subject to any other third party in a foreign country (other than potentially storing the information in a 'cloud'). Should this be required, relevant data subject consent will be obtained, if required, unless the information may be lawfully transferred across the borders; and transfers of such information will occur in accordance with the requirements of the law.

11. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

HealthRad is committed to ensuring the security of the personal information in its possession or under its control in order to protect it from unauthorised processing and access as well as loss, damage or unauthorised destruction. It continually reviews and updates its information protection measures to ensure the security, integrity and confidentiality of this information in accordance with industry best practices. We use a variety of security technologies and procedures to protect your personal information from unauthorised access, use or disclosure. For example, we store the personal information you provide on computer servers with limited access that are located in controlled facilities. In addition, cabinets and offices where physical records are held are locked. Furthermore, only those employees that require access to the information to discharge their functions are permitted access to the relevant information and only if they have concluded agreements with or provided undertakings to HealthRad requiring

them to implement appropriate security measures and to maintain the confidentiality of the information. Suppliers, service providers and vendors are required to adhere to the strict policies and processes implemented by HealthRad, including duties related to confidentiality and protection of information, and are subject to sanctions for any security breach. All security breaches are taken seriously and are addressed in accordance with the law.

12. PROCEDURE TO OBTAIN ACCESS TO RECORDS OR INFORMATION

The fact that information and records are held by HealthRad as listed in this Manual should not be construed as conferring upon any requester any right to that information or record. PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any right. If a public body lodges a request, the public body must be acting in the public interest. Access to records and information (other than that listed on HealthRad's website) is not automatic. Any person, who would like to request access to any of the above records or information, is required to complete a request form (Form 2), which is available from the Information Officer of HealthRad or the Information Regulator at the contact details stipulated above.

The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester must identify the right he/she is seeking to exercise or protect and explain why the record requested is required for the exercise or protection of that right. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the request is made to the satisfaction of the Information Officer. Access to the requested records or information or parts of the records or information may be refused in terms of the law. Requesters will be advised of the outcome of their requests.

13. FEES PAYABLE TO OBTAIN THE REQUESTED RECORDS OR INFORMATION

Fees may be charged for access to records held by HealthRad. These fees are prescribed in terms of PAIA. Details of the fees payable may be obtained from the Information Officer. The fees are also available from the Information Regulator.

14. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available for inspection, free of charge, at HealthRad's offices and on its website. A copy of the Manual may also be requested from the Information Officer against payment of a fee as may be applicable.