



PLATINUM HEALTH

**MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS
TO INFORMATION ACT NO. 2 OF 2000 (PAIA)
(AS AMENDED)**

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1 LIST OF ACRONYMS AND ABBREVIATIONS

Acronyms and Abbreviations	Description
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act (Act 2 of 2000), as amended
PH	Platinum Health
POPIA	Protection of Personal Information Act (Act 4 of 2013)
Minister	Minister of Justice and Constitutional Development
Regulator	Information Regulator
Republic	Republic of South Africa

2 INTRODUCTION

- 2.1 This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act No.2 of 2000 ("**PAIA**").
- 2.2 The aim of the Manual is to assist potential Requesters to request access to information (documents, records and/or Personal Information) from Platinum Health Medical Scheme ("**Platinum Health**") as contemplated under PAIA.
- 2.3 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.
- 2.4 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.
- 2.5 The definitions provided in this Manual are solely for the purpose of this Manual and are not to be taken as applicable to PAIA.

3 DEFINITIONS

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

- 3.1 **"Data Subject"** means the natural or juristic person to whom Personal Information relates;
- 3.2 **"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 Platinum Health 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;
- 3.3 **"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;
- 3.4 **"Employee"** means any person who works for, or provides services to, or on behalf of Platinum Health, and receives or is entitled to receive remuneration;
- 3.5 **"Information Officer"** means Platinum Health's designated information officer described in paragraph 5 of this Manual;
- 3.6 **"Information Regulator"** shall bear the meaning ascribed thereto in POPIA;
- 3.7 **"Manual"** means this manual, together with all annexures thereto as amended and made available at the offices of Platinum Health from time to time;
- 3.8 **"Medical Schemes Act"** means the Medical Schemes Act No. 131 of 1998, together with any regulations published thereunder;
- 3.9 **"Member"** means any person who is admitted as a Member of Platinum Health in terms of its medical scheme rules;
- 3.10 **"PAIA"** means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder;
- 3.11 **"Participating Employer"** is a company and/or associate company that mines platinum group metals and/or chrome which applies to the scheme for membership of its employees;
- 3.12 **"POPIA"** means the Protection of Personal Information Act No. 4 of 2013, together with any regulations published thereunder;
- 3.13 **"Personal Information"** has the meaning ascribed thereto under POPIA;
- 3.14 **"Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –

- 3.14.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- 3.14.2 dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or
- 3.14.3 merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, and "**Process**" has a corresponding meaning;
- 3.15 "**Requester**" means any person or entity (including any Data Subject) requesting access to a record that is under the control of Platinum Health; and
- 3.16 "**Third-Party**" means any independent contractor, agent, consultant, sub-contractor or other representative of Platinum Health.

4 **PURPOSE OF THE MANUAL**

- 4.1 This Manual has been prepared in respect of, and applies to, Platinum Health. This Manual is useful for the public to:
 - 4.1.1 check which categories of records Platinum Health holds, without having to submit a formal PAIA request;
 - 4.1.2 have a sufficient understanding of how to make a request for access to a record of Platinum Health by providing a description of the subjects on which Platinum Health holds records, and the categories of records held on each subject;
 - 4.1.3 know the description of the records of Platinum Health which are available in accordance with any other legislation;
 - 4.1.4 access all the relevant contact details of the Information Officer (IO) and Deputy Information Officer (DIO) who will assist the public with the records they intend to access;
 - 4.1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
 - 4.1.6 know if Platinum Health 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
 - 4.1.7 know the description of the categories of data subjects and of the information or categories of information;

- 4.1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 4.1.9 know if Platinum Health has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be supplied; and
- 4.1.10 know whether Platinum Health has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

5 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PLATINUM HEALTH

Chief Information Officer / Information Officer	Name: Rodney Gounden T: 087 463 0660 E: privacy@platinumhealth.co.za
Deputy Information Officer	Name: Natasha Kamaar T: 087 463 0660 E: privacy@platinumhealth.co.za
Access to information general contacts	E: privacy@platinumhealth.co.za
Head Office Postal Address: Physical Address: Website Address:	Private Bag X82081, Rustenburg, 0300 Mabe Park, 3 Kgwebo Street, Rustenburg, 0300 https://www.platinumhealth.co.za/

6 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 6.1 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**") easily, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA, and is available in each of the official languages.
- 6.2 The Guide contains a description of –
 - 6.2.1 the objectives of PAIA and POPIA;
 - 6.2.2 the postal and street address, phone and fax number and, if available, electronic mail address of –
 - 6.2.2.1 the Information Officer of every public body, and

- 6.2.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA, and section 56 of POPIA;
- 6.2.3 the manner and form of a request for –
 - 6.2.3.1 access to a record of a public body contemplated in section 11; and
 - 6.2.3.2 access to a record of a private body contemplated in section 50;
- 6.2.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- 6.2.5 the assistance available from the Information Regulator in terms of PAIA and POPIA;
- 6.2.6 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 –
 - 6.2.6.1 an internal appeal;
 - 6.2.6.2 a complaint to the Information Regulator; and
 - 6.2.6.3 an application with a court against a decision by the Information Regulator; and
 - 6.2.6.4 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 Information Regulator or a decision of the head of a private body;
- 6.2.7 the provisions of section 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;
- 6.2.8 the provisions of section 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively'
- 6.2.9 the notices issued in terms of section 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- 6.2.10 the regulations made in terms of section 92 of PAIA.
- 6.3 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 6.4 The Guide can also be obtained
 - 6.4.1 upon request to the Information Officer;
 - 6.4.2 from the website of the Regulator (<https://info regulator.org.za/paia-guidelines/>).

6.5 A copy of the Guide is also available in any of the official languages, for public inspection during normal office hours.

6.5.1 Any enquiries regarding this guide should be directed to:

Address:	The Information Regulator JD House, 27 Stiemens Street Johannesburg P.O Box 31533 Braamfontein 2017
Telephone Number:	010 023 5200
Email Address:	enquiries@inforegulator.org.za
Website:	https://inforegulator.org.za/paia

7 CATEGORIES OF RECORDS OF PLATINUM HEALTH WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the record	Available online	Available on request
Statutory records	Medical scheme rules, benefit options, information guides	x	x
Communications Records	Newsletters, publications, website notifications	x	x
Governance records	Annual financial statements as part of annual disclosures	x	x

8 DESCRIPTION OF THE RECORDS OF PLATINUM HEALTH WHICH ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

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

Category of Records	*Applicable Legislation
Electronic transactions and digital records	Electronic Communications and Transactions Act 25 of 2002
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Privacy policy	Protection of Personal Information Act 4 of 2013

Medical scheme registration certificate	Medical Schemes Act 131 of 1998
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*The above is not an exhaustive list of legislation that may require Platinum Health to keep records.

9 DESCRIPTION OF THE SUBJECTS ON WHICH PLATINUM HEALTH HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PLATINUM HEALTH

This section of the Manual sets out the categories and descriptions of records held by Platinum Health. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under PAIA. In particular, certain grounds of refusal as set out in PAIA may be applicable to a request for such records.

Subjects on which Platinum Health holds records	Categories of records
Governance	Vision and mission statements, management and structure, benefit guides, rules
Financial	Details of accounting officer, annual financial statements, banking records
Supplier	Supplier onboarding, account and payment details, contact person details
Administration	Records relating to members, dependents, participating employer groups, including contracts, membership forms, verification records, claims, statements, contributions
Human Resources	HR policies and procedures, advertised posts, employee records
Operations	Standard operating procedures, policies and plans

10 PROCESSING OF PERSONAL INFORMATION

10.1 Purpose of Processing Personal Information

10.1.1 Platinum Health 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.

10.1.2 Platinum Health will retain Personal Information only for as long as is necessary to accomplish Platinum Health's legitimate business purposes or for as long as may be permitted or required by applicable law.

10.1.3 We use the Personal Information we collect to (i) serve our Members, their Dependents, and Participating Employer 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 -

- 10.1.3.1 generally for the purposes of providing its services as a medical scheme to Members and Dependants, as per the rules of the medical scheme. This includes administration of the medical scheme, case management and client liaison;
- 10.1.3.2 for the purposes of providing its services as a Staff Model Health Maintenance Organisation, including the provision of primary, secondary and tertiary healthcare, dentistry, mental health, physiotherapy and optometry in accordance with medical scheme benefits, HIV/AIDS management, and chronic disease management, as well as work based health services including occupational healthcare, rehabilitation and functional assessment, trauma, emergency medical services and workplace wellness programs at Participating Employers' premises;
- 10.1.3.3 for purposes of onboarding suppliers, service providers or Designated Service Providers as approved suppliers/service providers of Platinum Health. For this purpose, Platinum Health will also Process a service provider's/supplier's Personal Information for purposes of performing the necessary due diligence checks;
- 10.1.3.4 in order to conduct due diligence processes on, *inter alia*, potential service providers, counterparties and/or participants in Platinum Health's corporate social responsibility initiatives;
- 10.1.3.5 in order to comply with obligations imposed on the Platinum Health 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;
- 10.1.3.6 in order to comply with Platinum Health's investment and/or procurement strategies and/or initiatives;
- 10.1.3.7 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);
- 10.1.3.8 generally for procurement and supply purposes;
- 10.1.3.9 for purposes of monitoring the use of Platinum Health's electronic systems and online platforms by Data Subjects. Platinum Health will, from time to time, engage third party service providers (who will Process the Data Subject's Personal Information on behalf of Platinum Health) to facilitate this;

- 10.1.3.10 for purposes of preventing, discovering and investigating violations of this Policy, the applicable law and other Platinum Health policies;
- 10.1.3.11 in connection with the execution of payment processing functions, including payment of Platinum Health's suppliers'/service providers' invoices;
- 10.1.3.12 for employment-related purposes such as recruiting staff, administering payroll, background checks, etc.;
- 10.1.3.13 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);
- 10.1.3.14 in connection with external audit purposes. For this purpose, Platinum Health engages external service providers and, in so doing, shares Personal Information of the Data Subjects with third parties;
- 10.1.3.15 in order to address inquiries or complaints in respect of Platinum Health's products, services or functions;
- 10.1.3.16 for the purposes of engaging in corporate social responsibility initiatives;
- 10.1.3.17 for such other purposes to which the Data Subject may consent from time to time;
- 10.1.3.18 for such other purposes as authorised in terms of applicable law; and
- 10.1.3.19 to comply with any applicable law.
- 10.1.4 Platinum Health will not use the Personal Information which we collect for any purposes other than those purposes specified in paragraph 10.1.3 above.

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

Categories of Data Subjects	Personal Information that may be processed
Member	<ul style="list-style-type: none"> • Names and Surnames; • Contact details; • Birthdate; • ID Number; • Gender; • Employment details; • Marital status; • Family/Dependent information; • Policy details; • Bank account details; • Biometric information; and • Medical and/or health information

Dependants	<ul style="list-style-type: none"> • Name and Surname • ID Numbers • Gender • Address and contact details • Birth certificates • Marriage certificates • Age • Biometric information; and • Medical and/or health information
Designated Service Providers and / or Third Parties	<ul style="list-style-type: none"> • Entity name • Registration number • Income tax number • Contact details for representative persons • FICA documentation • BBB-EE certificates • Invoices • Bank Account and Payment details
New Job Applicants	<ul style="list-style-type: none"> • Name and Surname • Address • Contact details • Email address • Telephone number • Details of qualifications and Skills • Employment history • Information about a Data Subject's entitlement to work in South Africa
Employees	<ul style="list-style-type: none"> • Name and Surname • ID number • Contact details • Physical and postal address • Date of birth • Age • Disability • Biometric Information • Employment history • Criminal/background checks • Education history • Banking details • Income tax reference number • Remuneration and benefits information (including medical aid, pension/provident fund information) • Disciplinary procedures • Employee disability information • Employee performance records • Physical access records • CCTV records • Health and safety records • Time and attendance records

	<ul style="list-style-type: none"> Health Professions Council of South Africa Membership Information
Website Visitors	<ul style="list-style-type: none"> IP address Email address / contact details (if provided by Data Subject) Membership information / unique identifiers (if provided by Data Subject)

10.2.1 Platinum Health collects Personal Information directly from the Data Subject and/or from Third Parties, and where Platinum Health obtains Personal Information from Third Parties, Platinum Health will ensure that it obtains the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where Platinum Health is permitted to do so in terms of the applicable laws.

10.2.2 Data Subjects in respect of which Personal Information is Processed include Members, Dependants, Participating Employer groups, employees and prospective Members, and service providers or Designated Service Providers.

10.2.3 Examples of Third Parties from whom Personal Information is collected include; regulatory bodies; other companies providing services to Platinum Health and where Platinum Health makes use of publicly available sources of information.

10.3 **The recipients or categories of recipients to whom Personal Information may be supplied**

Category of Personal Information	Recipients or Categories of Recipients to whom the personal information may be supplied
Any Personal Information as required to meet purpose specification	Statutory oversight bodies, regulators or judicial commissions of enquiry making a request in terms of applicable rules
Any Personal Information as required to meet purpose specification	Anyone making a successful application for access in terms of PAIA or POPIA
Any Personal Information as required to meet purpose specification	Any court, administrative or judicial forum, arbitration, statutory commission or ombudsman making a request in terms of applicable rules
Financial information or any Personal Information as required to meet purpose specification	Auditing, accounting bodies and professional advisors
Financial information or any Personal Information as required to meet purpose specification	Credit Bureau or credit providers, industry association or other association for an industry sector in which Platinum Health operates
Financial information or any Personal Information as required to meet purpose specification	South African Revenue Services or another similar authority

10.3.1 Platinum Health may share your Personal Information with affiliated companies, third parties engaged by us, or our business partners, to assist us to provide information, goods or services to you. Such third parties or business partners may include –

- 10.3.1.1 Associated health care providers, clinics and pharmacies;
 - 10.3.1.2 logistics providers;
 - 10.3.1.3 information technology hosting, data storage or archiving service providers, payment processing and debt collection services;
 - 10.3.1.4 professional advisors; and
 - 10.3.1.5 marketing, research and advertising agencies.
- 10.3.2 Further, Platinum Health may be required to disclose Personal Information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any Court or Tribunal. We may disclose Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Platinum Health, our Members, or others.
- 10.3.3 Platinum Health will comply with POPIA before transferring Personal Information to a Third-Party who is a contractor of Platinum Health. Before transferring Personal Information to a Third-Party contractor, such as an authorised service provider, Platinum Health will obtain assurances from the Third-Party that it will process Personal Information in a manner consistent with POPIA. Where Platinum Health learns that a Third-Party contractor is using or disclosing Personal Information in a manner contrary to POPIA, Platinum Health will take reasonable steps to prevent such use or disclosure.
- 10.3.4 We reserve the right to disclose and transfer a Data Subject's information, including their Personal Information in connection with a corporate merger, consolidation, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

10.4 **Planned Transborder Flows of Personal Information**

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

10.5 **General Description of Information Security Measures**

- 10.5.1 The security and confidentiality of Personal Information is important to Platinum Health. We have implemented reasonable technical, administrative, and physical security measures to protect Personal Information from unauthorised access or disclosure and improper use.
- 10.5.2 We are committed to ensuring that our security measures which protect your Personal Information are continuously reviewed and updated where necessary.

- 10.5.3 In Processing any Personal Information, Platinum Health shall comply with the following minimum technical and organisational security requirements–
- 10.5.3.1 **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.
- 10.5.3.2 **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.
- 10.5.3.3 **Unique User Identification** – Employees each have a unique user ID assigned to them, subject to strict confidentiality undertakings in terms of Platinum Health's password, access control and confidentiality policies.
- 10.5.3.4 **Passwords** – Platinum Health shall ensure that there are passwords required for any access to Personal Information in line with its password policy.
- 10.5.3.5 **Physical access and privileges** – Platinum Health ensures that access to Personal Information is limited to Employees on a "need to know" basis, and Platinum Health Employees are required to strictly utilise their unique user ID and applicable passwords to access same.
- 10.5.3.6 **Systems Review** – Platinum Health 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.

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, which form is attached hereto as Annexure "A". This must be made to the Information Officer at the address or electronic mail address of the body concerned (*see section 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 section 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 section 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 section 53(2)(f) of PAIA).

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 section 54(1) of PAIA).

11.3.1.2 The Requester must pay the prescribed fee to a private body. 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 Platinum Health, 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).

11.4 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 section 54(6) of PAIA).

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, an office of Platinum Health located far away from [Rustenburg];
 - 12.1.3 consultation among divisions of Platinum Health 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 12.1.1, 12.1.2 and 12.1.3, exist in respect of the request making compliance with the original period not reasonably possible; or
 - 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
- 13.1.6 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 Platinum Health;
 - (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 Platinum Health;
 - (c) contains information, the disclosure of which could reasonably be expected:
 - (i) to put Platinum Health at a disadvantage in contractual or other negotiations; or
 - (ii) to prejudice Platinum Health 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 Platinum Health, 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
- or
- 13.2.3 the record contains information about research being or to be carried out by or on behalf of Platinum Health, the disclosure of which would be likely to expose: (a) Platinum Health; (b) a person that is or will be carrying out the research on behalf of Platinum Health; or (c) the subject matter of the research, to serious disadvantage (*see section 69(2) of PAIA*).

14 REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

- 14.1 Platinum Health 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 A requester aggrieved by a decision of the Information Officer to refuse a request for access may, within 180 days of the Information Officer's decision, submit a complaint to the Information Regulator in the prescribed manner and form (*see section 77A of PAIA*).
- 14.4 Alternatively, a requester is entitled to apply to a court of competent jurisdiction for appropriate relief (*see section 78 of PAIA*).

15 OTHER INFORMATION HELD BY PLATINUM HEALTH AS PRESCRIBED

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

The Minister 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 A copy of this Manual is available –
- 16.1.1 On the website of Platinum Health at <https://www.platinumhealth.co.za/>
- 16.1.2 At the principal place of business of Platinum Health for inspection by the general public during normal office hours;
- 16.1.3 To any person, upon request, subject to the payment of a reasonable prescribed fee; and
- 16.1.4 to the Information Regulator upon request.

17 PRESCRIBED FORMS AND FEE STRUCTURE

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

Beyond what has been provided within this Manual, the applicable forms prescribed under PAIA may be located under Annexure A, as well as the fee structure under Annexure B of the Government Gazette No. 45057 R.757/2021.

18 UPDATING OF THE MANUAL

The CEO / IO of Platinum Health will on a regular basis update this Manual.

Issued by Rodney Gouden

Chief Executive Officer, Platinum Health

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>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.)</i>			
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	
<i>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.</i>	
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:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
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>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
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