



PAIA MANUAL





SPECSCARE (PTY) LTD

trading as **NURTURE HELDERBERG**

1. INFORMATION MANUAL

This manual was prepared in accordance with section 51 of the promotion of access to information act 2000 and to address the requirements of the protection of personal information ACT, 2013.

2. INTERPRETATION

In this document, clause headings are for convenience and shall not be used in its interpretation unless the context clearly indicates a contrary intention –

- 2.1 An expression which denotes –
 - 2.0.1 Any gender includes the other genders;
 - 2.0.2 A natural person includes an artificial or juristic person and vice versa;
 - 2.0.3 The singular includes the plural and vice versa;
- 2.2 The following expressions shall bear the meaning assigned to them below and cognate expressions bear corresponding meaning –
 - 2.2.1 “This document” - this document together with all of its annexures, as amended from time to time;
 - 2.2.2 “Company” - Spescare (Pty) Ltd;
 - 2.2.3 “Data Subject” - the natural or juristic person to whom the personal information relates;
 - 2.2.4 “The Act” - Promotion of Access to Information Act No. 2 of 2000, as amended from time to time including the regulation promulgated in terms of the Act;
 - 2.2.5 “Request liaison officer” – the person duly authorized by the head of the company and appointed by the company to facilitate or assist the head of the company with any request in terms of the Act.
 - 2.2.6 “POPI” – The protection of Personal Information Act. No. 4 of 2013;
 - 2.2.7 “Personal information” – the information relating to an unidentifiable, living, natural person, or an identifiable, existing juristic person, as defined in POPI;
 - 2.2.8 “Processing” – an operation or activity, whether by automatic means, concerning Personal Information.



- 2.3 Any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation or other legislation as at the signature date, and as amended or substituted from time to time;
- 2.4 If any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this document;
- 2.5 Where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this document;
- 2.6 Where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day;
- 2.7 Any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months or years, as the case may be;
- 2.8 The use of the word “including” followed by a specific example/s shall not be construed as limiting the meaning of the general working preceding it and the generis rule shall not be applied in the interpretation of such general working or such specific example/s;
- 2.9 Insofar as there is a conflict in the interpretation of or application of this document and the Act, the Act shall prevail;
- 2.10 This document does not purport to be exhaustive of or comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarize his/her/itself with the provisions of the Act before lodging any request with the company.

3. THE PRACTICE

Spescare (Pty) Ltd registration number (2012/050701/07) t/a Nurture Helderberg is a private company providing physical rehabilitation as well as acute medical services to South African as well as international patients in need thereof. By providing these services, Nurture Helderberg can create an environment in which these medical conditions can be treated to restore the patient’s health, dignity, and wellness. Because the company delivers medical treatment and holds information of current and former clients in accordance with the requirements of the Health Professionals Act of 1974, the Company is also bound to comply with several ethical rules as set out by the Health Professionals Council of South Africa (HPCSA), the duty to preserve patient confidentiality unless legislation or a court order compels it to act otherwise.



4. PURPOSE OF THE MANUAL

This manual is intended to foster a culture of transparency and accountability by giving effect to the right to information held by a private body that is required for the exercise or protection of any right, and actively promoting a society in which the people of South Africa have access to information to enable them to exercise and protect their rights.

Section 9 of the Act recognizes that justifiable limitations of the right to access may be permitted.

Such justifiable limitations include but are not limited to

- Reasonable protection of privacy;
- Commercial confidentiality;
- Effective, efficient, and good governance.

5. REQUEST FOR INFORMATION / AVAILABILITY OF THIS MANUAL

Any person who requests information should do so in accordance with, and in the formats prescribed by, the Act. Refer attachment (The Prescribed Form). It should be noted that commercial information and financial information may be withheld on the grounds of sections 63-70 of the Act.

Fees A request for access to a record, other than a record containing proprietary personal information, will be processed only after a request fee has been paid. Applicants will be notified of the amount of the request fee.

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.



6. PRACTICE DETAILS (Section 51(1)(A))

Full Name of practice	Spescare (Pty) Ltd
Trading name	Nurture Helderberg
Company Registration Number	2012/050701/07
Auditors	Mazars, Port Elizabeth
Postal Address (Administration)	PO Box 7572, Newton Park, 6055
Registered Address	30 Bird Street, Port Elizabeth, 6001
Managing director	Dr RDD Campbell
Designated Information Officer	Dirk J Malan
Telephone Number	041 072 0332
Cell phone Number	082 299 1086
Email address	dirkm@havenhealth.net and Spescare.info@nurturehealth.net



7. INFORMATION ON FORM OF COMPANY

The entity is a registered private company.

8. LEGISLATION AVAILABLE TO MEMBERS OF THE GENERAL PUBLIC – (SECTION 51(1)(D))

Companies Act 71 of 2008

- (a) All documents of incorporation are lodged at the offices of the Companies and Intellectual Property Commission (CIPC) and may be inspected there. The documents include the memorandum of incorporation as well as the relevant forms.
- (b) The register of members and register of transfer (of members) are available for inspection at the registered office of the company.
- (c) Special resolutions are lodged with the CIPC and are therefore available for inspection there.
- (d) A register of the directors' is kept at the registered office of the auditors of the company and is available for inspection.

Information / documents held in terms of other South African legislation

The following are some of the South African legislation in terms of which records may be held by the company. This is not an exhaustive list, and it must be pointed out that these records are not necessarily available to requestors in terms of the Act.

- Basic Conditions of Employment Act, 1997
- Bill of Rights of 1993
- Child Care Act 74 of 1983
- Children Act 38 of 2005
- Children's Amendment Act 41 of 2007
- Civil Aviation Offences Act 10 of 1972
- Close Corporations Act No 69 of 1984
- Companies Act, 1973
- Companies Act, 2008
- Competition Act, 1998
- Compensation for Occupational Injuries and Diseases Act, 1993
- Constitution of South Africa Act, 1996
- Consumer Protection Act 68 of 2008



- Co-Operatives Act No. 91 of Section 1981 Section 237
- Copyright Act, 1987
- Civil Union Act, 17 of 2006
- Correctional Services Act 111 of 1998
- Criminal Procedure Act, 1977
- Customs and Excise Act 91 of 1964
- Customs Control Act 31 of 2006
- Cybercrimes and Cybersecurity Bill of 2017
- Deeds Registries Act, No. 47 of 1937
- Debt Collectors Act, 1998
- Electronic Communications and Trans-actions Act, 2002
- Electronic Communications and Trans-actions Act, 2005
- Electronic Communications and Transactions Act 25 of 2002 (ECTA)
- Employment Equity Act, 1998
- Environment Conservation Act, No. 73 of 1989
- Extradition Act 67 of 1962
- Financial Advisory and Intermediary Services Act No 37 of 2002
- Financial Intelligence Centers Act 38 of 2001
- Firearms control Act, No 60 of 2000
- Guidance and Placement Act 62 of 1981
- Harmful Business Practices Act 70 of 1988
- Labour Relations Act, 1995
- Long term Insurance Act, No. 52 of 1998
- Maintenance and promotion of Competition Act of 1979
- Mutual Banks Act No. 124 of 1993
- National Archives and Record services Act, 43 of 1996
- National Credit Act 34 of 2005 (NCA)
- National Prosecuting Authority Amendment Act 56 of 2008
- National Road traffic Act, No. 93 of 1996
- Nuclear Energy Act 46 of 1999
- Income Tax Act, No. 58 of 1962, Sections 75(1) an (2)
- Income Tax Act, 1967
- Income Tax Act, 1962
- Insolvency Act, 1936



- Occupational Health and Safety Act, 1993
- Prescription Act No. 68 of 1969
- Prevention and combating of hate crimes and Hate Speech Bill of 2006
- Prevention of Combating Trafficking in persons Act 7 of 2013
- Prevention of Organized Crime Act, 1998
- Promotion of Access of information Act No. 2 of 2000
- Promotion of Administrative Justice Act of 3 of 2000 (PAJA)
- Promotion of Equality and Prevention of unfair Discrimination Act 4 of 2000 (PEPUDA)
- Protected Disclosures Act, No. 26 of 2000
- Protection of Access to information Act 2 OF 2000 (PAIA)
- Protection of Constitutional Democracy against Terrorist and related Activities Act 33 of 2004
- Regulations of Interceptions of Communications and Provision of Communication-related Information Act 70 of 2002 (RICA)
- Sale and service Matters Act No. 25 of 1964
- Second handed Goods Act No. 23 of 1955
- Short Term Insurance Act, No. 53 of 1998
- South African Police services Amendment Act of 57 of 2008
- South African Revenue Services Act 34 of 1997
- Spatial Data Infrastructure Act 54 of 2003 (SDI Act)
- Stamp Duties Act No. 77 of 1968, section 23(6)
- STANSA 15489, South African Standard for Record Management
- Stock Exchange Control Act No. 1 of 1985
- Tax Administration Act 28 of 2011
- Tobacco Products Control Act, No. 12 of 1999
- Trademarks Act 194 of 1993
- Transfer Duty Act, No. 40 of 1949
- Public Finance Management Act 1 of 1999
- Unemployment Contributions Act, 2002
- Unemployment Insurance Act, 2001
- Unemployment Insurance Act No. 30 of 1996
- Skills Development Act, 1998
- Skills Development Levies Act, 1999
- Skills Development Levies Act, 1997
- Value-Added Tax Act, 1991



9. EMPLOYMENT RECORDS

Records held by the company

The following is a list of the documents held by the company. Access to these documents may be protected by professional privilege or privacy laws or the grounds of refusal detailed in the Act.

Category Subjects/Description

- 9.1 Records relating to beneficiaries – These include correspondence, submitted applications and contracts.
- 9.2 Records relating to the incorporation of the company – Memorandum of Incorporation and Members Agreement.
- 9.3 Records relating to employees and ex-employees – These include policies and procedures, details of employment, employee files and remuneration data.
- 9.4 Employees' names and occupations; Time worked by each employee; Remuneration paid to each employee; Salaries and wages register; Disciplinary proceedings, Arbitration awards and CCMA cases; Employment Equity Plans, Skills Development Plans and training records; Staff records; Expense claims; IRP5's and Tax information pertaining to the employment of employees; Employee contracts; Performance management records; Incentive schemes; Conditions of Employment and Policies; Group personal accident; Group life; Locum agreements and Locum records.
- 9.5 Financial and administrative records and policies relating to the company's activities.
- 9.6 Accounting – Accounts, invoices, reconciliations, investment records, credit/debit notes, journals, ledgers, balance sheets, income statements, trial balances, payment schedules, cheque runs, cash flow statement, audit reports, purchasing records, transactional records.
- 9.7 Financial Information – Financial Statements, Financial and Tax Records (Company & Employees), Asset Register & Insurance information, Banking details.
- 9.8 Information technology – Information technology agreements, including computer software, support, and maintenance agreements.
- 9.9 Administration – Minutes of meetings of various committees within the company; General correspondence, Lease agreement; Copies and correspondence relating to various insurance policies;
- 9.10 General correspondence; Workpapers; Operating manuals of mechanical and electrical systems;



- 9.11 Remuneration Committee workpapers; Copies of and correspondence with regard to office building lease.
- 9.12 Correspondence with OEMs; Voicemail and security systems.
- 9.13 Human Resources – Contracts of employment; Documents relating to remuneration structuring; Job specifications; Format/procedures for advertising positions; Performance evaluations; Personnel .
- 9.14 Files; Policies and Procedures; All employment applications; Forms relating to new staff.
- 9.15 Appointment- and leave records; confidentiality undertakings; Various payroll, Workman’s Compensation documentation.
- 9.16 Legal – agreements, complaints, pleadings, briefs, and other documents pertaining to any actual or pending litigation, arbitration or investigation, material licenses, permits and authorizations.
- 9.17 Support services – List of suppliers and credit applications
- 9.18 Note: These records are not necessarily available to requestors in terms of the Act. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

10. PROCESS OF REQUESTING INFORMATION NOT AUTOMATICALLY AVAILABLE

- 10.1 A request shall be made on the prescribed form. A copy of the form is attached marked annexure “A” (the “prescribed form”). The form is also available from the website of the SAHRC, or the website of the Department of Justice and Constitutional Development at Home - Information Regulator (info regulator.org.za)
- 10.2 The prescribed form shall be submitted to the request liaison officer at his/her address, telefax number or e-mail address, who shall submit it to the head of the company, alternatively to his/her appointed deputy.
- 10.3 The same procedure as set out in 10.1 and 10.2 applies if the requester is requesting information on behalf of another person or on behalf of a permanent employee of the company.
- 10.4 The head of the company, as soon as reasonably possible and within 30 (thirty) days after the request has been received, shall decide whether to grant the request.
- 10.5 The requester will be notified of the decision of the head of the company or the request liaison officer in the manner indicated by the requester.
- 10.6 If the request is granted, the requester shall be informed by the head of the company; or the request liaison officer in the manner indicated by the requester in the prescribed form.



- 10.7 Notwithstanding the foregoing, the company will advise the requester in the manner stipulated by the requester in the prescribed form of:
- 10.7.1 The access fee to be paid for the information (in accordance with paragraph 11);
 - 10.7.2 The format in which access will be given; and
 - 10.7.3 The fact that the requester may lodge an appeal with a court of competent jurisdiction against the decision to not make the information requested available access fee charged or the format in which access is to be granted.
 - 10.7.4 After access is granted, actual access to the record requested will be given as soon as reasonably possible.
- 10.8 If the request for access is refused, the head of the company or the request liaison officer shall advise the requester in writing of the refusal. The notice of refusal will state:
- 10.8.1 Adequate reasons for the refusal having regard to the provisions of clause below;
 - 10.8.2 That the requester may lodge an appeal with a court of competent jurisdiction against the refusal of the request.
- 10.9 Upon refusal by the head of the company or the request liaison officer, the deposit paid by the requester will be refunded.
- 10.10 If the head of the company or the request liaison officer fails to respond within 30 (thirty) days after a request has been received, it is deemed, in terms of section 58 read together with section 56(1) of the Act, that the head of the company or the request liaison officer has refused the request.
- 10.11 The head of the company may decide to extend the period of thirty days ('original period') for another period of not more than thirty days if –
- 10.11.1 The request is for many records.
 - 10.11.2 The search for the records is to be conducted at premises not situated in the same town or city as the head office of the company;
 - 10.11.3 Consultation among divisions or departments of the company is required, the requester consents to such an extension in writing, and
 - 10.11.4 The parties agree in any other manner to such an extension.
- 10.12 Should the company require an extension of time, the requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension.
- 10.13 The requester may lodge an appeal with a court of competent jurisdiction against any extension or against any procedure set out in this section.



11. DESCRIPTION OF RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION TO MEMBERS OF THE GENERAL PUBLIC – (SECTION 51(1)(D))

- Companies Act 71 of 2008,
- Basic Conditions of Employment No. 75 of 1997,
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Currency and Exchanges Act No. 9 of 1933
- Debtor Collectors Act No. 114 of 1998
- Employment Equity Act No. 55 of 1998
- Harmful Business Practices Act No. 23 of 1999 Income Tax Act No. 95 of 1967
- Labour Relations Act No. 66 of 1995
- Medical Schemes Act No. 131 of 1998
- Medicines and Related Substances Control Act of 1965
- Occupational Health & Safety Act No. 85 of 1993
- Pension Funds Act No. 24 of 1956
- Regional Services Councils Act No. 109 of 1985
- Short Term Insurance Act No. 53 of 1998
- Skills Development Levies Act No. 9 of 1999 Skills Development Act No. 97 of 1998 Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991
- Old Persons Act, Act 13 of 2006
- Income Tax Act 58 of 1962
- National Health Act 61 of 2003 Trademarks Act 194 of 1993
- Any other health legislation not noted above



12. PROCEDURE OF HOW RECORDS CAN BE OBTAINED (MANNER OF ACCESS) – (SECTION 51(1)(E))

The requester must comply with all the procedural requirements as set out in the Act relating to the request for access to a record. The requester must complete the prescribed form to make the request and submit same as well as payment of a request fee and a deposit (if applicable), to the Information Officer at the postal, physical address, fax number or electronic mail address as noted in the Attachment (The Prescribed Form, “Form 2”)

13. PRESCRIBED FEES – (CHAPTER 3 SECTION 54)

The Act provides for two types of fees, namely

13.1 A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and is not refundable; and

13.2 An access fee, which is paid by all requesters if a request for access is granted.

This fee is inclusive of costs involved by the body in obtaining and preparing a record for delivery to the requester. When a request is received by the Information Officer, such officer shall by notice require the requester to pay the prescribed request fee before further processing of the request (s54(1)). Fees are set out in the Attachment (Fee Structure)

14. INFORMATION OR RECORDS NOT FOUND

If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record the affidavit or affirmation shall provide full details of all the steps taken to find the record or to determine its existence, including details of all communications by the Information Officer with every person who Conducted the search. This notice will be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act.

If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form unless the Information Officer refuses access.

The attention of the requester is drawn to the provisions of Chapter 4; Part 3 of the Act in terms of which the company may refuse, on certain specified grounds, to provide information to a requester.



15. INFORMATION REQUIRED ABOUT A THIRD PARTY

Chapter 5; Part 3 of the Act specifies the procedure regarding a request for information or records about a third party in considering such a request, the company will adhere to the provisions of the Act. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him that he may make written or oral representations to the Information Officer why the request should be refused, or give written consent for the disclosure of the record.

16. GROUNDS FOR REFUSAL OF A REQUEST

A private body is entitled to refuse a request for information on the following grounds:

Section 63

Provides for the mandatory protection of the privacy of a third party who is a natural person, including a deceased person who would involve the unreasonable disclosure of personal information of that natural person. Section 64 provides for the mandatory protection of the commercial information of a third party, if the record contains:

- 16.1 trade secrets of that third party
- 16.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
- 16.3 information disclosed in confidence by a third party to the private body, if such disclosure could put that third party at a disadvantage in negotiations or commercial competition;

Section 65

Provides for the mandatory protection of confidential information of third parties if such disclosure would constitute a breach of a duty of confidence owed to such third party in terms of any agreement;

Section 66

Provides for the mandatory protection of the safety of individuals and the protection of property;



Section 67

Provides for the mandatory protection of records, which would be regarded as privileged in legal proceedings;

Section 68

Provides for protection of the commercial activities of a private body, which may include:

- any intellectual property which the company might own, and which is protected by copyright
 - trade secrets
 - financial, commercial, scientific, or technical information, which disclosure could likely cause harm to a party's financial or commercial interests
 - information which, if disclosed, could put the Company at a disadvantage in negotiations
 - or commercial competition;
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Section 69

Provides for the protection of research information or that of a third party, if its disclosure would place the Company, the third party or the subject matter of the research at a serious disadvantage.

All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.



17. REMEDIES AVAILABLE

Internal Remedies

The company does not have internal appeal procedures. The decision by the Information Officer is final. Requesters will have to exercise such external remedies available at their disposal if a request is refused and the requester is not satisfied with the response of the Information Officer.

External Remedies

A requester that is dissatisfied with the Information Officer's refusal to disclose information may within 30 days of notification of the decision apply to Court for appropriate relief.

A third party who is dissatisfied with an Information Officer's decision to disclose information may within 30 days apply to a court for appropriate relief.

The courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Court, and which is presided over by a designated magistrate.

Processing of Personal Information in terms of the POPI Act.

18. PURPOSE OF PROCESSING

The company uses the Personal Information under its care in the following ways

- Fulfilling its statutory obligations in terms of applicable legislation;
- Verifying information provided to the company;
- Staff administration
- Keeping of accounts and records
- Obtaining information necessary to provide contractually agreed services to a customer;
- Monitoring, maintaining and managing the company's contractual obligation to customers, clients, suppliers, service providers, employees, directors and other third parties;
- Marketing and advertising;
- Resolving and tracking complaints;
- Monitoring and securing the assets, employees and visitors to the premises of the company;
- Historical record keeping, research and recording statistics necessary for fulfilling the company's business objectives.



Categories of Data Subjects and their Personal information

The company may possess records relating to suppliers, members, partners, contractors, service providers, staff, and clients (i.e., beneficiaries) which may be in connection with the following:

Entity Types

Personal Information Processed

Clients: Natural Persons

Name; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; confidential correspondence; identifying number, symbol, email address, telephone number, location information, online identifier, or other assignment to the person.

Clients – Juristic Persons / Entities

Name of contact person; Name of Legal Entity; registration Number; Physical and Postal address and contact details; Financial information; Founding documents; Tax related information; authorized signatories, beneficiaries, ultimate beneficial owners; BBBEE information.

Clients – Foreign Persons / Entities

Names; contact detail; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; confidential correspondence; identifying number; symbol, email address, telephone number, location information, online identifier, or other assignment to the person.

Contracted Service Providers

Name of the contact persons; Name of Legal Entity; Registration Number; Physical and Postal address and contract details; Financial information; founding documents; Tax related information; behavior. signatories, beneficiaries, ultimate beneficial owners; BBBEE information.

Employees / Directors

Biometric information; information relating to the education or the medical, financial, criminal or employment history of the data subject; Information relating to the race, gender, marital status, national origin, age, disability, language and birth of the Data Subject; well-being; The personal opinions, views or preferences of the Data Subject; Confidential correspondence sent by the Data Subject; The views or opinions of another individual about the Data Subject.



The company may process the Personal Information of the following categories of data Subjects, which includes current, past, and prospective Data Subjects

- Clients and employees, representatives, agents, contractors, and service provider of such clients.
- Suppliers, service providers to a vendor of the company and employees, representatives, agents, contractors and service providers of such suppliers and service providers;
- Directors and officers of the company;
- Members of the company;
- Job applicants;
- Existing and former employees (including contractors, agents, temporary and casual employees);
- Visitors to any premises of the company; and
- Complaints, correspondents, and enquiries.
- The company may supply Personal Information to the following recipients:
- Regulatory, statutory and government bodies;
- Employees of the company;
- Suppliers, service providers, vendors, agents and representatives of the company;
- The company's members and other stakeholders;
- Third party verification agencies and credit bureau;
- Collection agencies;
- Bank and other financial institutions.

Planned or prospective transborder flow of personal information processed by the company in respect of the above categories of Data Subjects

- Personal information may be transmitted transborder to the company's members, suppliers and/or funder in other countries, and Personal information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. The company will endeavor to ensure that its suppliers, funders, and members will make all reasonable efforts to secure said data and Personal Information.
- Current employees and consultant's information may also be transferred transborder where the company may be providing services or performing in terms of its contractual obligations.



General Description of Information Security Measures

The company employs up to date technology to ensure the confidentiality, integrity, and availability of the Personal Information under its care. Measures include:

- Firewalls
- Virus protection software and update protocols
- Logical and physical access control;
- Secure setup of hardware and software making up the IT infrastructure;
- Outsources Service Providers who process Personal Information on behalf of the company are contracted to implement security controls.

Security measures implemented or to be implemented by the company to ensure the confidentiality, integrity and availability for the personal information which may be or is being processed by the company

The company continuously establishes and maintains appropriate, reasonable technical and organizational measures to ensure that the integrity of the Personal Information which may be in its possession or under its control is secure and that such information is protected against unauthorized or unlawful processing, accidental loss, destruction or damage, alteration or access by having regard to the requirements set forth in law, kin, industry practice and generally accepted information security practices and procedures with apply to the company.

19. UPDATING OF THE MANUAL

The Company will update this manual at such intervals as may be deemed necessary.



ANNEXURE A - Fee Structure

REPRODUCTION FEES

The applicable fees for reproduction as referred

- The cost to access, reproduce, search for and/or prepare any of the abovementioned records, unless otherwise agreed, is R550 for all requests up to 200 pages and/or an electronic copy to be provided.
- Thereafter R100 will be added for every (or any part of additional) 100 pages.

Request Fees

Where a requester submits for access to information held by us on a person other than the requester himself/herself, a request fee in the amount of R50,00 is payable up-front before. The Company will further process the request received.

To search for and prepare the record for disclosure, R 125.00 for each hour or part of an hour reasonably required for such search and preparation.

For purposes of s54(2) of the Act, the following applies:

- Six hours will be the limit set before a deposit is payable and
- One third of the access fee is payable as a deposit by the requester
- The postage is payable when a copy of a record must be posted to a requester.

Please note: all fees are exclusive of Value Added Tax (VAT)