



**CLINIX HEALTH GROUP (PTY) LTD GROUP OF
COMPANIES MANUAL IN TERMS OF
THE PROMOTION OF ACCESS TO INFORMATION ACT, NO 2 OF 2000
(for the period of January 2024 to December 2024)**

The purpose of the Promotion of Access to Information Act, No. 2 of 2000 (PAIA) is to give effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights and to provide for matters connected therewith.

The Information Regulator has recognized limitations with the provisions of PAIA and the Protection of Personal Information Act, No. 4 of 2013 (POPIA) as it outlines various restrictions or limitations in accordance with the duty to balance contained in the Constitution.

Manual of the Clinix Health Group of Companies, as per the individual companies and entities on the attached list, herein represented by Clinix Health Group (Pty) Ltd, prepared in terms of section 51 of the PAIA.



1. PARTICULARS OF COMPANY AND THE INFORMATION OFFICER

Name of company: Clinix Health Group (Pty) Ltd
Registration number: 1997/017587/07

Chief Executive Officer: Khamane Obed Peter Matseke

The Information Officer: Johanesi Musiyiwa

Registered Address: Clinix Health Group (Pty) Ltd
Neriah Mathebe Matseke House
35 Morsim Road, Hyde Park,
Johannesburg

Telephone number: +27 11 429 1000

Fax number: +27 11 429 1110

E-mail address: cosec@clinix.co.za

2. The Human Rights Commission has prepared a guide in terms of Section 10 of the PAIA, containing information required by a person wishing to exercise any right contemplated in the Act. Any queries concerning the guide should be referred to the Human Rights Commission in Johannesburg.



Website Address: www.justice.gov.za

Head Office Address: 29 Princess of Wales Terrace, Cnr York and St Andrews Street, Parktown, Johannesburg
Private Bag 2700, Houghton, Johannesburg
2041

Telephone number: +27 11 484 8300

3. CATEGORIES OF RECORDS AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS IN TERMS OF THE ACT

Media publications

4. DESCRIPTION OF RECORDS THAT ARE AVAILABLE IN ACCORDANCE WITH THE FOLLOWING LEGISLATION

- a. All records that are legally required to be kept by the company in terms of the following legislation are available:
- i. National Health Act
 - ii. Companies Act /Close Corporation Act
 - iii. Labour Relations Act
 - iv. Occupational Health and Safety Act
 - v. Basic Conditions of Employment Act
 - vi. Consumer Protection Act
 - vii. Electronic Communications and Transaction Act
 - viii. Employment Equity Act

- ix. Compensation for Occupational Injuries and Diseases Act
- x. Unemployment Insurance Act
- xi. Income Tax Act
- xii. Promotion of Access to Information Act
- xiii. Promotion of Equality and Prevention of Unfair Discrimination Act
- xiv. Protection of Personal Information Act
- xv. Skills Development Act
- xvi. Value-Added Tax Act
- xvii. Unemployment Contributions Act
- xviii. Trademarks Act
- xix. Medical Schemes Act
- xx. Any other legislation relevant to the business concerned.

The list is not exhaustive.

5. SUBJECTS AND CATEGORIES OF RECORDS HELD

- 5.1 Records relating to corporate governance;
- 5.2 Records relating to the company's personnel;
- 5.3 Records relating to the company's contractors/suppliers or any other third party exchanged in the course of the company's business operations;
- 5.4 Records relating to the company's clients;
- 5.5 Finance and Accounting-related records;
- 5.6 Records relating to:
 - Administration;
 - Insurance;
 - Intellectual Property;
 - Marketing; and
 - Medical and Health information

Access to these records will be considered, keeping the relevant legal, including the legislative provisions and ethical duties in mind, including but not limited to the Protection of Personal Information Act, Sections 14 and 15 of the National Health Act, 2003 (Act No. 61 of 2003), section 13 of the Mental Health Care Act, 2000 (Act No. 17 of 2002) and Booklet 14 of the Health Professional Council of South Africa (HPSCA) and the purpose of the processing.

- 5.7 Operators that would have access to the information:
 - Auditors
 - B-BBEE Consultants
 - IT Consultants
 - Labour Consultants
 - Payroll Administrators

- Attorneys and Legal Council
- Risk Committee Members
- Billings and Pharmacy Managers
- Collections Managers
- Other Operators relevant to the company's business operations.

6. HOW TO GO ABOUT REQUESTING RECORDS

- 6.1 Access to records may be requested by completing the prescribed form, (attached and known as Form C) and submitting it to the Information Officer or Deputy Information Officer as set out in paragraph 1. The prescribed form must be completed comprehensively showing sufficient particularity to enable the Information Officer to process the request.
- 6.2 The requester is entitled to request access to information, including information pertaining to third parties, but the company is not obliged to grant such access and may be refused, in terms one of the prohibited grounds set out in the provisions of PAIA.
- 6.3 A requester may also be required to submit proof of payment of the request and access fee.
- 6.4 If an individual who is unable to make a request for access to a record on the basis of illiteracy or a disability, the request shall be orally. The oral request shall be reduced to writing by the Information Officer in the prescribed form.
- 6.5 If the request is made on behalf of another Person, proof must be submitted of the capacity in which such Person makes the Request.
- 6.6 The Information Officer/ deputy will notify the Requester within 30 days whether access is granted or refused, which period may be extended as set out in section 57 of PAIA.

7. IF THE REQUEST IS GRANTED

7.1 The Information Officer will notify the requester of the decision and will include the following details:

- The access fee (if any) to be paid upon access;
- The prescribed form which access will be given;
- The requester may lodge an internal appeal or an application with the court, as the case may be, against the access fee to be paid or the form of access granted and the procedure (including the period) for lodging the internal appeal or application, as the case may be.

8. IF THE REQUEST FOR ACCESS IS REFUSED

8.1 The Information Officer will notify the requester and state the following:

8.1.1 Adequate reasons for the refusal, including provisions of the PAIA;

8.1.2 The requester may lodge an internal appeal or an application with a court, as the case may be, against the refusal of the request and the procedure (including the period) for lodging the internal appeal or application, as the case may be.

9. ACCESS TO HEALTH RECORDS

9.1 When a request relates to health records or information about the physical or mental health or wellbeing of the requester or the request is made on behalf of the person to whom the record relates, and the Information Officer is of the opinion that the disclosure of the record to the relevant person might cause serious harm to his or her physical or mental health or wellbeing, the Information Officer may, before giving access consult with a health practitioner who has been nominated by the requester.

9.2 If the requester is:

- 9.2.1 under the age of 16 years, then a person having parental responsibilities for the requester must nominate the health practitioner; or
- 9.2.2 incapable of managing his or her affairs, a person appointed by the court to manage those affairs must make that nomination.
- 9.3 If access to health records and information is granted and the health practitioner nominated is of the opinion that the disclosure of the records would likely cause serious harm to the requester's physical or mental health or wellbeing, the Information Officer may only give access to the record if requester proves to the satisfaction of the Information Officer that adequate provision is made for counselling or arrangements practicable before, during or after the disclosure of the record to limit, alleviate or avoid such harm.

10. RIGHT OF INTERNAL APPEAL

- 10.1 The requester shall have a right of internal appeal if the request for information is waived or deemed to be waived, that needs to be exhausted before the requester can escalate the request to litigation.
- 10.2 The internal appeal—
- 10.2.1 must be lodged within 60 days of the date of refusal or deemed refusal;
- 10.2.2 must be delivered or sent to the Head of Legal at legal@clinix.co.za and a hard copy thereof must be addressed to the Legal Manager, Clinix Health Group (Pty) Ltd and delivered to 47 St. Patrick's Road, Houghton, Johannesburg.
- 10.2.3 must identify the subject of the internal appeal and state the reasons for the internal appeal and may include any other relevant information known to the appellant.
- 10.3 If an internal appeal is lodged after the expiry of the period referred to above, the relevant authority will, upon good cause shown, allow the late lodging of the internal appeal.



SIGNED AT JOHANNESBURG ON THE 4th DAY OF JUNE 2024

JOHANESI MUSIYIWA

GROUP COMPANY SECRETARY