

**CLINIX HEALTH GROUP (PTY) LTD MANUAL IN TERMS OF  
THE PROMOTION OF ACCESS TO INFORMATION ACT, NO  
2 OF 2000**

**(for the period December 2025 to December 2026)**

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.

Clinix Health Group (Pty) Ltd Manual (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 Promotion of Access to Information Act, No 2 of 2000.

**1. Particulars Of Company and Authorized Officer**

Name of company	:	Clinix Health Group (Pty) Ltd Registration number: 1997/017587/07
Authorized Officer	:	Dr. Mandi Mzimba (Information Officer)
Postal Address	:	P O Box 805, Houghton, 2041
Street Address	:	Clinix Health Group 35 Morsim Road, Hyde Park
Telephone number	:	+27 11 429 1000
Fax number	:	+27 11 429 1110

E-mail address : [informationofficer@clinix.co.za](mailto:informationofficer@clinix.co.za)

## **2. Information Regulator Guide**

The Information Regulator has published the guide as is prescribed by section 10 of the PAIA. The guide is available at the offices of the Information Regulator.

**Physical Address Postal Address:** 54 Maxwell Dr, Woodmead, Midrand, 2191

**Telephone:** +27 (0) 10 023 5200

**E-mail:** [helpdesk@info regulator.org.za](mailto:helpdesk@info regulator.org.za)

**Website:** <https://eServices.info regulator.org.za>

## **3. Categories of records available without a person having to request access in terms of the Act**

There is currently no description of categories of records which are automatically available in terms of section 52(2) of the Act.

## **4. Description of records that are available in accordance with the following legislation**

All records that are legally required to be kept by the company in terms of the following legislation are available:

- 4.1. Any other legislation relevant to the business concerned
- 4.2. National Health Act 61 of 2003
- 4.3. Medical Schemes Act 121 of 1998
- 4.4. Occupational Health and Safety Act 85 of 1993
- 4.5. Nursing Act No. 50 of 1978
- 4.6. Pharmacy Act No. 53 of 1974
- 4.7. Health Professions Act 56 of 1974
- 4.8. Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
- 4.9. Constitution of the Republic of South Africa No.108 of 1996
- 4.10. Basic Conditions of Employment Act 75 of 1997
- 4.11. Labour Relations Act 66 of 1995
- 4.12. Employment Equity Act 55 of 1998
- 4.13. Promotion of Equity and Prevention of Unfair Discrimination Act No. 4 of 2000
- 4.14. Unemployment Insurance Act No. 63 of 2001
- 4.15. Value-Added Tax Act No. 89 of 1991
- 4.16. Prevention and Combating of Corrupt Activities Act No. 12 of 2004
- 4.17. Income Tax Act No. 58 of 1962
- 4.18. Protection of Personal Information Act (POPIA) No. 4 of 2013
- 4.19. Competition Act No. 89 of 1998
- 4.20. Companies Act No. 71 of 2008
- 4.21. Broad Based Black Economic Empowerment Act No. 53 of 2003

4.22. Consumer Protection Act 68 of 2008

## 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
- 5.7 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.

SIGNED AT: Hyde Park ON 24 DAY OF March 2026

Dr Mandi  
Mzimba

Digitally signed  
By Dr Mandi Mzimba  
Date: 2026.03.24  
16:02:47

**DR. MANDI MZIMBA**

**INFORMATION OFFICER**

## ANNEXURE A

NAME OF HOSPITAL	REGISTRATION NUMBERS
Clinix Botshelong-Empilweni Private Hospital (Pty) Ltd	1993/002389/07
Clinix Phakisa Mokhesi Private Hospital (Pty) Ltd	1996/009414/07
Clinix Tshepo-Themba Private Hospital (Pty) Ltd	1994/007666/07
Clinix Dr SK Matseke Memorial Private Hospital (Pty) Ltd	1980/004750/07
Clinix Selby Park Private Hospital (Pty) Ltd	2003/024982/07
Clinix Health Management (Pty) Ltd t/a Clinix Solomon Stix Morewa Memorial Hospital	1995/007347/07
Clinix Itokolle – Mafikeng Private Hospital (Pty) Ltd	2005/019767/07
Clinix Health Group (Pty) Ltd	1997/017587/07
Clinix Cullinan Wellness Hospital (Pty) Ltd	2010/015989/07
Clinix Agency (Pty) Ltd	2004/011522/07
Clinix Health Academy (Pty) Ltd	2013/159768/07
Clinix Dr GM Pitje Day Hospital (Pty) Ltd	2019/179039/07

## ANNEXURE B

### HOW TO SUBMIT A PAIA REQUEST

#### 1. Complete and submit the Prescribed Form

Access to records may be requested by completing the prescribed form, (attached and known as Form 2) and submitting it to the Information Officer on this email address [informationofficer@clinix.co.za](mailto:informationofficer@clinix.co.za). The prescribed form must be completed comprehensively to enable the Information Officer to process the request.

Submit the completed form together with supporting documents including:

- A certified copy of your ID/passport
- Unabridged birth certificate
- Death certificate
- Executorship letter
- Proof of authority (if acting on behalf of someone else) or consent provided by the individual.
- Consent to release records

It is important to note that incomplete requests may delay processing.

If an individual is unable to make a request for access to a record, such as in cases of illiteracy or a disability, the Act provides mechanisms to ensure access such as making an oral request which the Information Officer shall reduce to writing in the prescribed form. Alternatively, a person can act on behalf of an individual that cannot make a request themselves; however, the requester must submit proof of their capacity to act on behalf of that person to the reasonable satisfaction of the Information Officer (e.g., a letter of authority or power of attorney).

#### 2. Applicable Fees

CHG will use the Act as guidance for fees prescribed and will communicate this together with the outcome of the request. A requester may also be required to submit proof of payment of the request and access fee.

### 3. Timeframes

The Information Officer is required to reply to a request within a thirty (30) day period as stipulated in the Act. This commences once a requester has complied with all the requirements of the Act in requesting access to a record, to the satisfaction of the Information Officer.

The Information Officer will notify the Requester within thirty (30) days from the date we receive a complete request whether access is granted or refused and give notice with reasons (if required). The thirty (30) day period may be extended as set out in section 57 of PAIA.

#### Extension of Time

The thirty (30) day period within which Clinix Health Group (“CHG”) has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty (30) days if:

- The request involves a large volume of records
- Records must be collected from different offices or offsite storage facilities
- Consultation with third parties is required or
- The request cannot reasonably be completed within the original timeframe.

CHG will notify the Requester in writing should an extension be sought.

### 4. If the request is granted

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.

### 5. If the request is refused

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

- Adequate reasons for the refusal, including provisions of the PAIA;
- 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.

## 6. Grounds for Refusal

Access to records may be refused in accordance with PAIA, including where disclosure would involve:

- Mandatory protection of privacy of a third party who is a natural person, including a deceased person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of commercial information of a third party or CHG, if the record contains:
  - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party or CHG; and
  - Information disclosed in confidence by a third party to CHG if the disclosure could put that third party to a disadvantage or commercial competition.
- Mandatory protection of certain confidential information of a third party if disclosure of the record would result in a breach of a duty of confidence owed to that party in terms of an agreement;
- Mandatory protection of the safety of individuals, and the protection of property;
- Mandatory protection of records privileged from production in legal proceedings, unless the legal privilege has been waived; and
- Mandatory protection of research information of a third party and of CHG.

If only part of a record cannot be disclosed, we will provide access to the remainder where possible.

## 7. Requests Involving Third Parties

If the request relates to information about a third party:

- CHG may be required to notify that third party.
- The third party may make representations before a decision is taken.

This may affect the processing timeline.

## 8. Access to health records

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.

If the requester is:

- under the age of 16 years, then a person having parental responsibilities for the requester must nominate the health practitioner; or
- incapable of managing his or her affairs, a person appointed by the court to manage those affairs must make that nomination.
- 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.

## 9. Right to appeal

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.

The internal appeal—

- must be lodged within sixty (60) days of the date of refusal or deemed refusal;
- must be delivered or sent to the Head of Legal at [legal@clinix.co.za](mailto:legal@clinix.co.za) and a hard copy thereof must be addressed to the Legal Manager, Clinix Health Group (Pty) Ltd and delivered to 35 Morsim Road, Hyde Park, Johannesburg.
- 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.

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.

## 10. Protection of Personal Information

All personal information provided to us in connection with a PAIA request will be processed in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA").

**FORM 2**

**REQUEST FOR ACCESS TO RECORD**

[Regulation 7]

**NOTE:**

- 1. Proof of identity must be attached by the requester.
- 2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ (Address)

E-mail address: \_\_\_\_\_

Fax number: \_\_\_\_\_

Mark with an "X"

- Request is made in my own name       Request is made on behalf of another person.

PERSONAL INFORMATION	
Full Names	
Identity Number	
Capacity in which request is made <i>(when made on behalf of another person)</i>	
Postal Address	
Street Address	

E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

**PARTICULARS OF RECORD REQUESTED**

*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.)*

Description of record or relevant part of the record:	

Reference number, if available	
Any further particulars of record	
<b>TYPE OF RECORD</b> <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	

<b>FORM OF ACCESS</b> <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	

<b>MANNER OF ACCESS</b> <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**

*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.*

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) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- c) 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.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

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 (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

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**FOR OFFICIAL USE**

Reference number:	
Request received by: (State Rank, Name And	

<i>Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

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***Signature of Information Officer***