PROMOTION OF ACCESS TO INFORMATION ACT
SECTION 51 MANUAL OF ADVANCED PANORAMA SURGICAL CENTRE (PTY) LTD
(2012/049581/07)

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No.2 of 2000) ("**the Act")** and the Protection of Personal Information Act, 2013 (Act No.4 of 2013). The Act gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and/or held by a private person or entity where such information is required to protect a requester's rights.

OVERVIEW

The Company is Advanced Panorama Surgical Centre (Pty) Ltd ("**the Hospital**"), a private company with limited liability, duly incorporated in terms of the provisions of the Companies Act, 2008.

This manual serves to inform members of the public of the categories of information we hold, and which may, subject to the grounds of refusal authorised in the Act, be disclosed after evaluation of a request for access application being made in terms of the Act.

AVAILABILITY OF THIS MANUAL

A copy of this manual is available -

- At our front-desk at our registered office situated at Panorama Healthcare Centre, Cnr Hennie Winterbach & Rothschild Bvld, Panorama, 7500
- From our Company Secretary at ML@advancedhealth.co.za
- On request from our Information Officer, details below
- On our website: www.advancedhealth.co.za
- From the Information Regulator:

  INFORMATION REGULATOR CONTACT DETAILS:
  The Information Regulator (South Africa) may be contacted for any queries regarding this Manual or the operation of PAIA and POPIA:
  JD House, 27 Stiemens Street, Braamfontein, Johannesburg
  P.O. Box 31533, Braamfontein, Johannesburg, 2017
  Tel: 010 023 5207
  Email: PAIAComplaints@inforegulator.org.za / POPIAComplaints@inforegulator.org.za
  Website: www.inforegulator.org.za

This Manual will be updated from time to time, as and when required.

OUR INFORMATION OFFICERS

Our Information Officer is: Dorena Goss-Ross; Group Managing Director, Tel: (012) 346 5020;
Email: bibi@advancedhealth.co.za

Our Deputy-Information Officer is: Marietha Barnard; Facility Manager; Tel nr: (021) 9113555;
E-mail: managerpanorama@advancedhealth.co.za

HOW TO REQUEST ACCESS TO RECORDS HELD BY THE HOSPITAL

Requests for access to records held by the Hospital must be made on the request form that are attached to this Manual or available from our website or offices, also attached hereto as **Annexure A ("Request Form")**.

When a record is requested, the following will apply:

- Fees may be payable as prescribed by the PAIA Regulations.
- The Request Form must be completed by the Requester.
- **On the Request Form all details must be completed, including the right the Requester wants to protect by requesting the information and WHY access to the information is required**.
- If the Requester is acting on behalf of someone else, the signature of the other person as the one who has authorised the request, must be provided. In order to verify this, the Company may require further proof such as an identify document or may call the person whose information it is to verify that s/he has given permission for the other person to access the information on his/her behalf.
- The Requester must state in which format (inspection of copy, paper copy, electronic copy, transcript, etc.) s/he wants to access the information.
- If the record is part of another record, the Requester will only be able to access the part(s) that pertains to the information s/he wants or is entitled to, and not the rest of the record.
- The Request will be acknowledged.
- An answer will be provided within 30 days, and if not granted, state the reasons for the denial with reference to the specific provisions in the Act.
- As a private body, the Hospital does not have an internal appeal procedure. If a request for access is refused, the requester may lodge an application with a court in terms of section 78 of PAIA for appropriate relief.

HOW THE PROMOTION OF ACCESS TO INFORMATION ACT WORKS

The Section 10 Guide: A Guide on how to use the Promotion of Access to Information Act, 2000, has been compiled by the Information Regulator in terms of section 10 of the Act. The Guide contains information to assist persons wishing to exercise any right in terms of PAIA. It is available from the Information Regulator (see contact details above).

Section 50 of the Act provides that a requester may be provided access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, to access to a record of a private body for the exercise or protection of any rights, other than its rights, it must be acting in the public interest.

Requests under the Act must be made in terms of the procedures prescribed by the Act, at the rates provided.

For further information on the Act and how it works, a Guide developed by the Human Rights Commission and to be updated from time to time by the Information Regulator, will be published by the Information Regulator from time to time.

VOLUNTARY DISCLOSURE: (SECTION 52(2) OF PAIA)

The following categories of records are voluntarily disclosed and may be obtained without the need for a formal PAIA request. This list is not exhaustive and may be updated from time to time:

- Documents available on our website: www.advancedhealth.co.za, including:
  - Address and contact details of the Company
  - Terms and Conditions of patient admissions
  - Pre-admission forms
  - Day Hospital information
  - Information about accepted medical aids
  - Information about types of surgical procedures offered
  - Articles and other information pieces
  - Directors' summaries
  - Group company structure
  - Vacancies at Day Hospitals
  - Doctor contact details
- Information brochures about the Day Hospitals
- Annual financial results

Grounds for refusal: Access to certain records may be refused in accordance with Chapter 4 of Part 3 of PAIA, including (but not limited to) where such access would involve the unreasonable disclosure of personal information, confidential commercial information of a third party, privileged legal advice, trade secrets, research information, or the safety of individuals or property. Each refusal will cite the specific section relied upon.

RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Information is available in terms of the following legislation, subject to conditions set by such laws. As legislation changes from time to time, and new laws may stipulate new matters and extend the scope of access by persons specified in such entities, this list should be read as not being a final and complete list.

Business legislation (including all regulations issued in terms of such legislation):
Constitution of South Africa; Companies Act 121 of 1998; Income Tax Act 58 of 1962; Value Added Tax Act 89 of 1991; Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997; Employment Equity Act 55 of 1998; Skills Development Levies Act 9 of 1999; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Disease Act 130 of 1993; Occupational Health and Safety Act of 85 of 1993; Electronic Communications and Transactions Act 25 of 2002; Telecommunications Act 103 of 1996; Electronic Communications Act 36 of 2005; Consumer Protection Act 68 of 2008; Broad-based Black Economic Empowerment Act 53 of 2003; National Credit Act 34 of 2005; Protection of Personal Information Act 4 of 2013; Promotion of Access to Information Act 2 of 2000; King Report & King code of Corporate Governance for SA, 2016 etc.

Health legislation (including all regulations issued in terms of such legislation): *(This legislation is of extreme relevance in the health sector and Requesters should familiarise themselves with it.)*
The National Health Act 61 of 2003; Medicines and Related Substances Act 101 of 1965; Children's Act 38 of 2005; Mental Healthcare Act 17 of 2002; Choice on Termination of Pregnancy Act 92 of 1996; Sterilisation Act 44 of 1998; Health Professions Act 56 of 1974; HPCSA regulation etc.

RECORDS HELD BY THE HOSPITAL AND RELATED CATEGORIES OF DATA SUBJECTS

We hold records in the categories listed below. **The fact that we list a record type here does not necessarily mean that we will disclose such records**, and all access is subject to the evaluation processes outlined herein, which will be exercised in accordance with the requirements of the Act.

Internal records relating to our business as a Company, which includes our founding and other documents (e.g. registration as a Company), minutes and policies; annual and other reports; financial records; claims records; reimbursement records; appeals and complaints / disputes; operational records, policies and procedures; contracts; licences, trademarks and other intellectual property; production, marketing records; other internal policies and procedures; internal correspondence; statutory records; insurance policies and records; etc.

Personnel (employee) records, which includes records of temporary/fixed term/part-time/permanent employees, locums, associates, contractors, partners, directors (executive and non-executive). Records include personal files, records third parties have provided to us about their / our staff; employment contracts, conditions of employment; workplace policies; disciplinary records; termination records; minutes of staff meetings; performance management records and systems and all employment-related correspondence.

Health records, which includes patient admission forms; client/patient lists; medical scheme and funder information; funding records; consents; financial and accounts information; research information; and similar information. ***It must be noted that, in the health sector, personal, health and patient information are protected by legislation and ethical rules, and disclosure can only take place, if at all, within those frameworks.***

Supplier and service provider records, which includes supplier registrations; contracts; confidentiality agreements and non-disclosure agreements, communications; logs; delivery records; commissioned work; and similar information, some of which might be provided to us by such suppliers and providers under service- and other contacts.

SAHPRA and Technical records, which includes applications, approvals, updates on products and licences, manuals, logs, electronic and cached information, health professional council / statutory body records, approvals, conditions and requirements, trade association information and similar product information.

Third party information, which may be in our possession, but which would be subject to the conditions set in relation to such possession and use or purpose limitations.

Environment and market information, which include information bought; publicly available information; commissioned information which pertains to the specific sector and market of our business and factors that affect the business; information relating to professional and healthcare environment.

CATEGORIES OF RECIPIENTS OF PERSONAL INFORMATION

In compliance with the Protection of Personal Information Act (POPIA), the Hospital processes personal information of the following data subject categories:

- Patients: name, ID, contact details, demographic data, medical history, diagnoses, billing information, health funder details, consent forms;
- Suppliers and Service Providers: registration information, contact persons, banking details, tax numbers, BEE certificates, and contractual documentation;
- Healthcare Practitioners: practice numbers, qualifications, indemnity cover details, and professional correspondence;
- Visitors and Guests: limited identification and entry log information for security purposes;
- Employees: identification, contact details, qualifications, employment history, remuneration details, disciplinary records, leave, and next-of-kin information.

We may share relevant personal and health information with our Operators, i.e. those who manage parts of our business on our behalf. We may also share such information with:

- Regulatory bodies
- Medical practitioners
- Medical health schemes
- Medical aid funders
- Service providers / suppliers
- Banks / financial service providers

PLANNED TRANS-BORDER FLOW OF PERSONAL INFORMATION

The Company does not have any planned trans-border flow of personal information.

PURPOSE OF THE PROCESSING OF THE RECORDS REFERRED TO

The purpose of processing the information contained in the records listed above, is:

In relation to **the Business/internal records**: For good corporate governance and to comply with business, financial, Company and tax legislation.

In relation to **Employees**: for retention of employment records as legislated and execution of employer/employee agreements and labour legislation.

In relation to our **Patients**: for retention of records as required by law and to provide quality healthcare & related services.

In relation to **Suppliers and Service Providers**: for record retention as legislated and for the execution of the supplier and service level agreements.

THE SUITABILITY OF THE INFORMATION SECURITY MEASURES

The Company stores information electronically and physically as follows:

- Physical records are kept at the Hospital premises and access is controlled by secure storage measures.
- There is an alarm system, fire alarm and camera.
- Copies of records are kept in filing cabinets in a lockable stoor room.
- Electronic records are kept on shared drives, cloud storage compliant with ISO27001 standards, office computers which are password protected, with software regularly updated to protect against hacking, unauthorised access and tampering.
- Staff are trained to avoid behaviours and practices that could place records at risk and on good practice that would keep electronic information reasonably secure.
- Records are archived every three months and such archiving facility is secure in that the service provider has implemented an extensive security program to ensure the protection of privacy, integrity, confidentiality, availability and ensure accountability around the safeguarding of personal information.
- Retention and destruction take place in terms of the Company's Document Retention and Destruction Policy.

RETENTION AND DESTRUCTION OF RECORDS

Records are retained for the minimum periods prescribed by law and our internal policies, including:

- Patient records: minimum of 6 years from the date of last treatment (or longer as required by health legislation);
- Employment records: duration of employment plus at least 3 years thereafter;
- Financial and tax records: at least 5 years as per the Income Tax Act and Companies Act;
- CCTV or surveillance records: typically retained for 30 to 90 days;
- Thereafter, records are destroyed or de-identified in accordance with the Company's Document Retention and Destruction Policy.

PRESCRIBED FEES

The following applies to the request other than personal requests:

- The requestor is required to pay the prescribed fee of R140 before the request will be processed.
- If the preparation of the record requested requires more than the prescribed 6 (six) hours, a deposit of not more than one third of the access fee which would be payable if the access was granted, shall be payable.
- The requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- Records may be withheld until fees have been paid.

This updated manual is signed by DORENA GOSS ROSS on 1 October 2025.

Signature: DORENA GOSS-ROSS