PROMOTION OF ACCESS TO INFORMATION ACT

SECTION 51 MANUAL OF
MEDGATE DAY CLINIC (PTY) LTD

Registration number 2000/011092/07

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended, and section 51 of the Protection of Personal Information Act 4 of 2013.

Medgate Day Clinic

October 2026

1. DEFINITIONS AND INTERPRETATION

"Company" or "Hospital"	Medgate Day Clinic (Pty) Ltd, registration number 2000/011092/07, trading as Medgate Day Clinic.
"DIO"	Deputy Information Officer.
"IO"	Information Officer and head of the private body.
"PAIA"	Promotion of Access to Information Act 2 of 2000, as amended.
"PAIA Regulations"	Regulations Relating to the Promotion of Access to Information, 2021.
"POPIA"	Protection of Personal Information Act 4 of 2013.
"Regulator"	Information Regulator (South Africa).

2. PURPOSE AND SCOPE OF THIS MANUAL

This Manual describes the records held by the Hospital, records that may be available without a formal PAIA request, the procedure for requesting access, and the information required by PAIA and POPIA. Access remains subject to PAIA, including the applicable grounds for refusal.

The Hospital forms part of the Advanced Health group and conducts day-hospital operations at Medgate Medical Centre. This Manual applies to records held by the Hospital in its own capacity, including patient, clinical, healthcare-practitioner, employee, supplier, operational, governance and financial records.

3. COMPANY AND CONTACT DETAILS

Registered name	Medgate Day Clinic (Pty) Ltd
Registration number	2000/011092/07
Trading name	Medgate Day Clinic
Nature of body	Private company operating a day hospital
Physical address	Medgate Medical Centre, Cnr Kingfisher and Pheasant Street, Helderkruin, 1724
Telephone	(011) 768 1015
Website	www.advancedhealth.co.za
Information Officer	Dorena "Bibi" Goss-Ross, Group Managing Director
Information Officer email	bibi@advancedhealth.co.za
Deputy Information Officer	Carina de Jongh
Deputy Information Officer email	carina.dj@advancedhealth.co.za

4. AVAILABILITY OF THIS MANUAL

This Manual:

- is available at the Hospital's front desk at the physical address above;
- is available on the Advanced Health group website, www.advancedhealth.co.za;
- may be requested electronically from the IO or DIO;
- will be available for inspection, free of charge and by prior arrangement, during normal business hours; and
- will be provided to the Regulator upon request.

5. INFORMATION REGULATOR CONTACT DETAILS

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200
Toll-free number	0800 017 160

General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

6. GUIDE ON HOW TO USE PAIA

The Regulator has compiled and updated the Guide contemplated in section 10 of PAIA. The Guide explains how to exercise rights under PAIA and POPIA, the applicable forms and fees, available remedies and how to lodge a complaint. It is available in each official language and in Braille from the Regulator's website and offices.

7. HOW TO REQUEST ACCESS TO A RECORD

A request must be made on prescribed Form 2 under regulation 7 of the PAIA Regulations and submitted to the IO or DIO. Form 2 is available from the Regulator's website.

- The requester must identify the record and the right to be exercised or protected, and explain why the record is required for that purpose.
- A requester acting for another person must provide proof of identity, authority and capacity.
- The requester must state the preferred form of access and provide all information required by Form 2.
- The Hospital will decide the request within 30 days after receipt, unless the period is validly extended once for not more than a further 30 days under section 57 of PAIA.
- Access remains subject to Chapter 4 of Part 3 of PAIA, including the protections for personal information, third-party commercial information, confidential information, safety, privileged records, research information and the Hospital's commercial information.
- The Hospital has no internal appeal procedure. A requester or third party may lodge a complaint with the Regulator on prescribed Form 5 within 180 days of the decision and may thereafter seek court relief under section 78 of PAIA.

8. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

No notice describing categories of records automatically available from the Hospital has been published by the Minister under section 52(2) of PAIA. Subject to applicable legal restrictions, the following may nevertheless be available without a formal request:

- the Hospital's address and contact details;
- this Manual;
- terms and conditions of patient admission and pre-admission forms;
- general day-hospital information;
- information about accepted medical schemes and types of procedures offered;
- articles, brochures, public vacancies and other public information;
- group-company and director summaries;
- public healthcare-practitioner contact details; and
- annual financial results or other information authorised for public release.

9. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Records may be available to persons entitled to them under applicable legislation, including:

- Constitution of the Republic of South Africa, 1996;
- Companies Act 71 of 2008 and Companies Regulations, 2011;
- Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; 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 Act 97 of 1998; Skills Development Levies Act 9 of 1999; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993; Occupational Health and Safety Act 85 of 1993;
- Electronic Communications and Transactions Act 25 of 2002; 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, to the extent applicable;

- National Health Act 61 of 2003; Medicines and Related Substances Act 101 of 1965; Medical Schemes Act 131 of 1998; Health Professions Act 56 of 1974; Nursing Act 33 of 2005; Pharmacy Act 53 of 1974; Allied Health Professions Act 63 of 1982; Children's Act 38 of 2005; Mental Health Care Act 17 of 2002; Choice on Termination of Pregnancy Act 92 of 1996; Sterilisation Act 44 of 1998; Hazardous Substances Act 15 of 1973; National Environmental Management: Waste Act 59 of 2008; applicable regulations and professional ethical rules;
- POPIA; and PAIA.

10. SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE HOSPITAL

Listing a category does not mean that every listed record exists or that access will be granted. Access is determined under PAIA in each case.

Corporate and governance records: founding documents; statutory registers and returns; beneficial ownership records; shareholder and board records; minutes; resolutions; policies; reports; licences; insurance; and regulatory correspondence.

Operational and hospital records: hospital licences and approvals; operating procedures; accreditation; facility, theatre and ward administration; admissions; scheduling; quality and safety; incidents; complaints; claims; clinical governance; and operational correspondence.

Patient and health records: admission forms; patient lists; medical and clinical records; diagnoses; treatment information; consents; medical-scheme and funder information; accounts; claims; and research information. Health information is specially protected and may be disclosed only within the applicable legal and ethical framework.

Healthcare-practitioner records: credentials; professional registrations; practice numbers; qualifications; indemnity cover; admission rights; contracts; peer-review or clinical-governance records; and professional correspondence.

Personnel records: employee, applicant, locum, contractor and director records, including identification; contracts; conditions of employment; remuneration; leave; performance; disciplinary; training; health and safety; termination; and employment correspondence.

Supplier and service-provider records: registrations; due diligence; contracts; confidentiality undertakings; B-BBEE; banking and tax information; invoices; logs; delivery records; commissioned work; and correspondence.

Financial, tax and commercial records: financial statements; management accounts; budgets; banking; audit; tax; insurance; funding; reimbursement; procurement; marketing; intellectual property; contracts; disputes; and legal records.

Information technology and security records: system and user-access records; logs; email and electronic records; cybersecurity policies; incident records; backups; CCTV; and records held by operators.

Regulatory and technical records: records relating to SAHPRA and other health-sector regulators; applications; approvals; licences; manuals; inspections; conditions; professional councils; and trade associations.

Third-party and market information: information lawfully received from patients, practitioners, funders, medical schemes, suppliers, regulators, group entities and other third parties, and public or commissioned market information.

11. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

11.1 Categories of data subjects and personal information

Patients: identification, contact and demographic information; medical history, diagnoses, treatment and consent information; billing, funder and medical-scheme information.

Employees, applicants, locums and contractors: identification, contact, qualifications, employment history, remuneration, tax, leave, performance, disciplinary, health and safety and next-of-kin information.

Healthcare practitioners: identification, contact, practice numbers, qualifications, registrations, indemnity cover and professional correspondence.

Suppliers and service providers: registration, contact-person, banking, tax, B-BBEE, contractual, billing and due-diligence information.

Visitors and guests: limited identification, access-control, CCTV and incident information.

Shareholders, directors and group representatives: identification, contact, ownership, governance, transaction and correspondence information.

Regulators, funders and other business contacts: identification, contact, mandate, claims, transaction and correspondence information.

11.2 Purposes of processing

- providing, administering and funding healthcare services;
- patient admission, treatment, continuity of care, billing, claims and clinical governance;
- verifying and administering healthcare-practitioner credentials and admission rights;
- employment, contractor and workplace administration;
- supplier management, procurement and contract performance;
- corporate governance, regulatory compliance, financial reporting, tax, audit, funding, insurance and risk management;
- health and safety, access control, fraud prevention, information security and business continuity; and
- legal advice, disputes, complaints, claims and other lawful compatible purposes.

11.3 Recipients or categories of recipients

- healthcare practitioners and other persons involved in patient care;
- medical schemes, managed-care organisations, funders and claims administrators;
- regulators, professional councils, statutory bodies, courts and law-enforcement bodies where lawful;
- Advanced Health group entities and authorised representatives where lawful and necessary;
- banks, funders, insurers, auditors, attorneys and professional advisers; and
- operators and suppliers providing laboratory, imaging, information-technology, storage, billing, debt-collection, security and other support services.

11.4 Planned trans-border processing

The Hospital does not currently envisage transferring personal information outside the Republic. Any future transfer or processing outside the Republic will comply with section 72 of POPIA and use an applicable lawful transfer mechanism and appropriate safeguards.

11.5 General description of information-security measures

The Hospital applies safeguards appropriate to the nature and sensitivity of the information, including:

- role-based and need-to-know access controls;
- password protection, authentication, software updates, anti-malware and secure cloud or shared-drive controls;
- locked storage, controlled premises access, alarms, fire protection and CCTV where applicable;
- confidentiality obligations and written operator arrangements;
- backup, archiving, incident-management and business-continuity measures;
- staff awareness and information-security training; and
- retention and secure destruction or de-identification under applicable law and Hospital policies.

12. RIGHTS OF DATA SUBJECTS

Subject to POPIA and other applicable law, a data subject may request confirmation of whether the Hospital holds personal information, request access to or correction or deletion of personal information, object to processing where permitted, and lodge a complaint with the Regulator. Prescribed forms are available from the Regulator.

13. RETENTION AND DESTRUCTION OF RECORDS

Records are retained for periods required by law, professional and ethical rules, contractual and operational requirements, audit requirements and any litigation hold. Patient records are retained with due regard to the nature of the record, the age of the patient and medico-legal requirements. When retention is no longer lawful or necessary, records are securely destroyed or de-identified under the Hospital's retention and destruction policy.

14. PRESCRIBED FEES

- The prescribed request fee is R140 and must be paid before processing. No request fee is payable by a personal requester.
- If search and preparation will exceed six hours, the Hospital may require a deposit not exceeding one third of the access fee that would be payable if access is granted.
- Reproduction, access, search and preparation fees are payable at the rates in Annexure B to the PAIA Regulations. Records may be withheld until applicable fees have been paid.
- A requester may lodge a complaint with the Regulator or apply to court, as provided in PAIA, regarding a fee or deposit decision.

15. APPROVAL AND SIGNATURE

This Manual was approved for Medgate Day Clinic (Pty) Ltd on 1 October 2026 and will be updated when required.

Bibi Goss-Ross

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DORENA "BIBI" GOSS-ROSS

Information Officer and Group Managing Director

For and on behalf of Medgate Day Clinic (Pty) Ltd