



**PAIA MANUAL (AS REQUIRED BY SECTION 51 OF ACT NO.2 OF 2000, PROMOTION
OF ACCESS TO INFORMATION ACT)**

HEREINAFTER REFERRED TO AS 'THE ACT'

EFFECTIVE DATE: 01/03/2021

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(Signature)

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AUTHORISATION DATE: 20 / 02 / 2026

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1. INTERPRETATION

- 1.1 In this document, clause headings are for convenience and shall not be used in its interpretation unless the context clearly indicates a contrary intention; an expression which denotes –
 - 1.1.1 any gender includes the other genders.
 - 1.1.2 a natural person includes an artificial or juristic person and vice versa.
 - 1.1.3 the singular includes the plural and vice versa.
- 1.2 The following expressions shall bear the meanings assigned to them below and cognate expressions bear corresponding meanings –
 - 1.2.1 **"This document"** - this document together with all of its annexures, as amended from time to time.
 - 1.2.2 **"The Company"** refers to the Group of Companies consisting of HH Dürrheim (Pty) Limited t/a Medipost Pharmacy; Medilogistics (Pty) Limited; Kawari Wholesalers (Pty) Limited and Medi Training Academy (Pty) Limited.
 - 1.2.3 **"The Act"** - Promotion of Access to Information Act No. 2 of 2000, as amended from time to time including the regulations promulgated in terms of the Act.
 - 1.2.4 **"Group Information Officer"** - the person duly authorised by the GCOO and appointed by the Company to facilitate or assist the GCOO with any request in terms of the Act.
- 1.3 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.
- 1.4 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.
- 1.5 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.
- 1.6 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.
- 1.7 Any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months or years.
- 1.8 The use of the word "including" followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and the *eiusdem generis* rule shall not be applied in the interpretation of such general wording or such specific example/s.
- 1.9 Insofar as there is a conflict in the interpretation of or application of this document and the Act, the Act shall prevail.
- 1.10 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 familiarise his/her/itself with the provisions of the Act before lodging any request with the Company.

2. APPLICABLE LEGISLATION

<u>No</u>	<u>Ref</u>	<u>Act</u>
1	No 61 of 1973	Companies Act
2	No 98 of 1978	Copyright Act
3	No 55 of 1998	Employment Equity Act
4	No 95 of 1967	Income Tax Act
5	No 66 of 1995	Labor Relations Act
6	No 89 of 1991	Value Added Tax Act
7	No 101 OF 1965	Medicines and Related Substances Act (previously Drugs Control Act)
8	No 37 of 2002	Financial Advisory and Intermediary Services Act
9	No 75 of 1997	Basic Conditions of Employment Act
10	No 25 of 2002	Electronic Communications and Transactions Act
11	No 2 of 2000	Promotion of Access of Information Act
12	No 30 of 1996	Unemployment Insurance Act
13	No 53 of 1974	Pharmacy Act

3. INTRODUCTION

- 3.1. Medipost Holdings is a Private Company (Pty limited) "The Company" that is treated by South African law as a separate legal entity and must register as a taxpayer in its own right. We conduct our business in terms of the:
- a. Companies Act, Medicines and Related Substances Act (previously Drugs Control Act) 101 of 1965, Pharmacy Act 53 of 1974, South African Pharmacy Board guidelines and other relevant legislation.
- 3.2 **"The Company"** refers to the Medipost Holdings Group of Companies consisting of HH Dürrheim (Pty) Limited t/a Medipost Pharmacy; Medilogistics (Pty) Limited; Kawari Wholesalers (Pty) Limited and Medi Training Academy (Pty) Limited:
- a) HH Dürrheim (Pty) Limited t/a Medipost Pharmacy is a national pharmacy, delivering medication satisfied patients across South Africa. Medipost employs staff members, of which many are highly skilled pharmacists and pharmacist assistants with dedicated medical scheme responsibilities and can implement sound chronic medicine supply and management systems ensuring adherence to Good Pharmacy Practices (GPP) and patient convenience.
- b) Medilogistics (Pty) Limited provides courier services that includes logistics and distribution of a range of pharmaceutical, niche and specialised products on behalf of its diverse clients. Temperature-controlled warehouses and insulated vehicles can handle delivery of both ambient and cold chain items within the specified temperature

and humidity range. Medilogistics is following the principles of Good Pharmacy Practice when delivering medicines.

- c) Kawari Wholesalers (Pty) Limited specialised services include wholesaling, distribution and warehousing of pharmaceuticals, medical devices, medical consumables and other products. The warehousing functions include the receiving of stock, storage in a temperature-controlled warehouse and cold room, processing of orders and picking and packing of orders. All according to SAHPRA and GWDP guidelines.
- d) Medi Training Academy (Pty) Limited is committed to excellence in teaching and learning and aims to design curricular programs appropriate to its South African context.

4. AIM

4.1. The Protection of Personal Information Act (POPI) is intended to balance two competing interests. These are:

- a) Our individual constitutional rights to privacy (which requires our personal information to be protected); and
- b) The needs of our society to have access to and to process (work with) our personal information for legitimate purposes, including the purpose of doing business.

4.2. This manual sets out the framework for our company's compliance with the POPIA and is useful for the public to:

- a) Check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- b) Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- c) Know the description of the records of the body which are available in accordance with any other legislation.
- d) Access all the relevant contact details of the Information Officer and Deputy Information Officer(s) who will assist the public with the records they intend to access.
- e) Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- f) Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- g) Know the description of the categories of data subjects and of the information or categories of information relating thereto.
- h) Know the recipients or categories of recipients to whom the personal information may be supplied.
- i) Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.
- j) Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

5. DETAILS

Key contact details for access to information of **MEDIPOST HOLDINGS:**

5.1. Group Information Officer:

Name: **Jan Swanepoel**
Tel: (012) 426 4017 ext 6694
Email: medi-popia@medipost.co.za
Fax number: (012) 335 6764

5.2. Deputy Information Officers:

Entity: HH Dürrheim (Pty) Ltd t/a Medipost Pharmacy
Name: **Wilma Truter**
Tel: (012) 426 4017 ext 6526
Email: medi-popia@medipost.co.za
Fax Number: (012) 335 6764

Entity: Kawari Wholesalers (Pty) Ltd
Name: **Juan Theron**
Tel: (012) 426 4001 ext 6261
Email: medi-popia@medipost.co.za
Fax Number: (012) 335 6764

Entity: Medilogistics (Pty) Ltd
Name: **Sizwe Mdimma**
Tel: (010) 426 4000 ext 6899
Email: medi-popia@medipost.co.za
Fax Number: (012) 335 6764

Entity: Medi Training Academy (Pty) Ltd
Name: **Minette Horstmann**
Tel: (012) 426 4000 ext 5458
Email: medi-popia@medipost.co.za
Fax Number: (012) 335 6764

5.3. Access to information general contacts:

Email: medi-popia@medipost.co.za

5.4. Head Office:

Postal Address: PO Box 27140,
Gezina, 0084

Physical Address: Gezina City,
593 Nico Smith Street,
Gezina, 0084.

Telephone: (012) 426 4017

Email: info@medipost.co.za

Website: www.medipost.co.za

5.5. Subsidiaries:

5.5.1. Medipost Pharmacy

Full Name of Business Entity:	HH Dürrheim (Pty) Ltd t/a Medipost Pharmacy
Registration Number:	1997/011099/07
Postal Address:	PO Box 27140 Gezina 0084
Physical Address:	593 Nico Smith Street Gezina Pretoria 0084
Telephone:	012 426 4017
Website:	www.medipost.co.za

5.5.2.Kawari Wholesalers

Full Name of Business Entity:	Kawari Wholesalers (Pty) Ltd
Registration Number:	2004/015737/07
Postal Address:	Postnet Suite 030 Private Bag X16 Highveld Park 0169
Physical Address:	Unit 1, Block A, Technohub 59 Roan Crescent Corporate Park North Midrand 1682
Telephone:	010 426 0120
Website:	www.kawari.co.za

5.5.3. Medilogistics

Full Name of Business Entity:	Medilogistics (Pty) Ltd
Registration Number:	2011/129984/07
Postal Address:	PO Box 27140 Gezina 0084
Physical Address:	13 Steenbok Street Koedoespoort Pretoria 0186
Telephone:	012 426 4017
Website:	www.medilogistics.co.za

5.5.4. Medi Training Academy

Full Name of Business Entity:	Medi Training Academy (Pty) Ltd
Registration Number:	2014/001573/07
Postal Address:	PO Box 27140 Gezina 0084
Physical Address:	593 Nico Smith Street Gezina Pretoria 0084
Telephone:	012 426 4017
Website:	www.meditraining.medipost.co.za

5.6. **Contact Details of the GCOO and Group Information Officer:**

a) The GCOO:

Telephone: 012 426 4017

Email: management@medipost.co.za

b) The Group Information Officer:

Telephone: 012 426 4017

Email: medi-popia@medipost.co.za

5.6.1. Our Information Officer is **Jan Swanepoel** who is our Legal Compliance Manager in a senior management position nominated and authorised by our GCOO in writing. Our Information Officer's responsibilities include, but not limited to:

- a) Ensuring compliance with the POPIA;
- b) Dealing with requests which we receive in terms of the POPIA; and
- c) Working with the Information Regulator in relation to investigations.

5.6.2. Our Information Officer must designate in writing as many Deputy Information Officers as are necessary to perform the tasks mentioned in paragraphs 5.6.1 and 5.6.4.

5.6.3. Our Information Officer and our Deputy Information Officers must register themselves with the Information Regulator prior to taking up their duties whereby the Information Officer is responsible for ensuring that such registration takes place in compliance with Clause 5.6.1 (a).

5.6.4. In carrying out their duties, our Information Officer and Deputy information Officers must ensure that:

- a) this manual is implemented;
- b) a Personal Information Impact Assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information;
- c) that this manual is developed, monitored, maintained and made available;
- d) that internal measures are developed together with adequate systems to process requests for information or access to information;
- e) that internal awareness sessions are conducted regarding the provisions of the POPIA, the Regulations, codes of conduct or information obtained from the Information Regulator; and
- f) that copies of this manual are provided to persons at their request, hard copies to be provided upon payment of a fee (to be determined by the Information Regulator).

5.6.5. Guidance notes on Information Officers have been published by the Information Regulator (on 1 April 2021) and our Information Officer and Deputy Information Officers must familiarise themselves with the content of these notes.

6. INFORMATION REGULATOR PAIA "HOW TO GUIDE"

- 6.1. The Information Regulator has compiled a "How to Guide", as contemplated in section 10 of the Act, containing information to assist any person who wishes to exercise any right as contemplated in the Act. The contact details of the Information regulator are:

Physical address:

JD House,
27 Stiemens Street,
Braamfontein,
Johannesburg, 2001.

Postal address:

P.O Box 31533,
Braamfontein,
Johannesburg, 2017.

Telephone: 010 023 5200

Email: enquiries@inforegulator.org.za

6.2. How to use the PAIA and how to obtain access to the Guide:

- 6.2.1. The Regulator has, in terms of section 10(1) of the PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in the PAIA and POPIA.

6.2.2. The Guide is available in each of the official languages.

6.2.3. The aforesaid Guide contains the description of-

- a) the objects of the PAIA and POPIA;
- b) the postal and street address, phone and fax number and, if available, electronic mail address of-
 - o the Information Officer of every public body, and
 - o every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- c) the manner and form of a request for-

¹Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

²Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

- access to a record of a public body contemplated in section 11³; and
- access to a record of a private body contemplated in section 50⁴;
- d) the assistance available from the IO of a public body in terms of the PAIA and POPIA;
- e) the assistance available from the Information Regulator in terms of the PAIA and POPIA;
- f) all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by the PAIA and POPIA, including the manner of lodging-
 - an internal appeal;
 - a complaint to the Information Regulator; and
 - an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Information Regulator or a decision of the head of a private body;
- g) the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- h) the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- i) the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- j) the regulations made in terms of section 92¹¹.

³Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

6.2.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Information Regulator, during normal working hours.

6.2.5. The Guide can also be obtained-

- a) upon request to the Information Officer;
- b) from the website of the Information Regulator (<https://www.inforegulator.co.za/>).

6.2.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours -

- a) English
- b) Afrikaans

7. RECORDS

7.1. Records That Are Automatically available:

7.1.1. The following records are automatically available to all employees and need not be requested in accordance with the procedure outlined in clause 8:

- a) Employees have access to a record of their own information;
- b) Records of disciplinary hearings and related matters are available to the employee concerned;
- c) The Company's Policies and Procedures Manual;
- d) The Company's Corporate Identity Manual.

7.1.2. The following records are automatically available to the general public and all employees and need not be requested in accordance with the procedure outlined in clause 8:

- a) The Company's Employment Equity Plan;
- b) The Company's Skills Development Plan;
- c) Newsletters;

7.1.3. Regulations, Ethical Rules and Guidelines Booklets;

7.1.4. Forms for lodging complaints; (free of charge);

7.1.5. General information brochures; (free of charge).

7.2. Records Held by The Company In Terms Of Other Legislation As Contemplated In Section 51(1)(D) Of The Act:

7.2.1. The following records are not automatically available without a request in terms of the Act (all Statutory returns):

Category of Records
Memorandum of Incorporation
PAIA Manual
VAT
Corporate Tax Records
Workmen's Compensation
UIF
Regional services levies
Skills development levies

7.3. Other Types of Records Held By The Company As Contemplated In Section 51(1)(D) Of The Act:

7.3.1. These records are not automatically available without a request in terms of the Act. A request in terms of this section is subject to Section 63(1) of the Act, which provides that the head of a private body must refuse a request for access to a record of the Company if the disclosure of the record would involve the unreasonable disclosure of personal information about a third party including a deceased individual.

7.3.2. Human Resources Department

- a) Employee information including personal information, employment history and health records that the Company may hold from time to time;
- b) Training and development information; and
- c) General files containing information on employee benefits and employee recruitment and selection information.

7.3.3. Project Management

- a) Building plans; and
- b) Information generally related to projects conducted by the Company from time to time.

7.3.4. Information Technology

- a) Usage statistics;
- b) Equipment details; and
- c) Costing of hardware and software.

7.3.5. Functions and Events

- a) Function records and related costing;
- b) Stock sheets; and
- c) List of suppliers.

7.3.6. Finance / Accounts Department

- a) Financial records;
- b) A list of the company's Creditors and debtors;
- c) Salary information;
- d) Bank accounts information; and
- e) Fixed assets register.

7.3.7. Marketing Department

- a) Company brochures and publications;
- b) Documents relating to public relation events; and
- c) Company media releases.

7.3.8. Support Services

7.3.9. Delivery and collection sheets

8. PROCESS OF REQUESTING INFORMATION NOT AUTOMATICALLY AVAILABLE

- 8.1. 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 Information Regulator.
- 8.2. The prescribed form shall be submitted to the Group Information Officer at their address, telefax number or email address, who shall hand it to the GCOO of the Company.
- 8.3. 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.
- 8.4. The GCOO of the Company, as soon as reasonably possible and within thirty (30) days after the request has been received, shall decide whether to grant the request.
- 8.5. The requester will be notified of the decision of the GCOO of the Company or the Group Information Officer in the manner indicated by the requester.
- 8.6. If the request is granted, the requester shall be informed by the GCOO of the Company or the Group Information Officer in the manner indicated by the requester in the

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prescribed form.

- 8.7. Notwithstanding the above, the Company will advise the requester in the manner stipulated by the requester in the prescribed form of:
 - a) The access fee to be paid for the information;
 - b) The format in which access will be given; and
 - c) The fact that the requester may lodge an appeal with a court of competent jurisdiction against the access fee charged or the format in which access is to be granted.
- 8.8. After access is granted, actual access to the record requested will be given as soon as reasonably possible.
- 8.9. If the request for access is refused, the GCOO or the Group Information Officer shall advise the requester in writing of the refusal. The notice of refusal shall state:
 - a) Adequate reasons for the refusal;
 - b) That the requester may lodge an appeal with a court of competent jurisdiction against the refusal of the request (including the period) for lodging such an appeal.
- 8.10. Upon the refusal by the GCOO or the Group Information Officer, the deposit paid by the requester will be refunded.
- 8.11. If the GCOO or the Group Information Officer fails to respond within thirty (30) 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 GCOO or the Group Information Officer has refused the request.
- 8.12. The GCOO may decide to extend the period of thirty (30) days ("**original period**") for another period of not more than thirty (30) days if:
 - a) The request is for a large number of records;
 - b) 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;
 - c) Consultation among divisions or departments, as the case may be, of the Company is required;
 - d) The requester consents to such an extension in writing; and
 - e) The parties agree in any other manner to such an extension.
- 8.13. 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.
- 8.14. The requester may lodge an appeal with a court of competent jurisdiction against any extension or against any procedure set out in this section.

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9. PROCESSING OF PERSONAL INFORMATION

9.1. Reasons for processing personal information within the organisation:

- a) Enabling the organisation to provide various products and services;
- b) Enabling service delivery to patients and clients;
- c) Concluding and managing necessary contractual relationships;
- d) Abiding by statutory and legislative compliance requirements;
- e) Protecting the legitimate interests of the Company; it's employees and /or data subjects;
- f) Marketing purposes;
- g) Recruitment; HR; and general employee management;
- h) Compulsory reporting in terms of legislation;
- i) To conduct internal and external auditing and reporting as may be required from time to time.

9.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto:

Entity Type	Personal Information Processed
Customers/clients/contractors /visitors: Natural Persons	Names; contact details; physical and postal addresses; date of birth; ID number; tax related information; nationality; gender; confidential correspondence; medical information; banking information.
Customer – Juristic Persons / Entities	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners; shareholding information; B-BBEE information, banking information.
Contracted Service Providers	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners; shareholding information; B-BBEE information; banking information.

Employees / Directors	Gender; pregnancy; marital status; colour, race; age; language; education information; financial information; employment history; criminal records; ID number; physical and postal address; contact details; opinions; criminal record; health and well-being; banking details; next of kin.
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9.3. The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	MIE, MarisIT, Dynamic Profiling, South African Police Services.
Qualifications, for qualification verifications	South African Qualifications Authority, MIE, MarisIT, Dynamic Profiling
Credit and payment history, for credit information	Credit Bureaus, Trade References
Particulars of members for administration of medical aid schemes and related products	Medical Schemes
Information as legally required	Group Companies and Affiliates

9.4. Information Security Measures

9.4.1 The Company has implemented reasonable technical and organisational measures to ensure suitable, optimal security, confidentiality, integrity, and safety of all information. These measures include:

- a) Physical security measures;
- b) Access control measures;
- c) Encryption measures;
- d) Cyber security measures;
- e) Anti-Virus measures;
- f) Security firewalls;
- g) Password control;
- h) Employee training and awareness;
- i) Various information technology and information control policies.

9.5. Planned transborder flows of personal information

9.5.1. None.

10. OUR UNDERTAKINGS TO OUR CLIENTS:

- 10.1. We undertake to follow POPI at all relevant times and to process personal information lawfully and reasonably, so as not to infringe unnecessarily on the privacy of our clients.
- 10.2. We undertake to process information only for the purpose for which it is intended, to enable us to do our work, as agreed with our clients.
- 10.3. Whenever necessary, we shall obtain consent to process personal information.
- 10.4. Where we do not seek consent, the processing of our client's personal information will be following a legal obligation placed upon us, or to protect a legitimate interest that requires protection.
- 10.5. We shall stop processing personal information if the required consent is withdrawn, or if a legitimate objection is raised.
- 10.6. We shall collect personal information directly from the client whose information we require, unless:
 - a) the information is of public record, or
 - b) the client has consented to the collection of their personal information from another source, or
 - c) the collection of the information from another source does not prejudice the client, or
 - d) the information to be collected is necessary for the maintenance of law and order or national security, or
 - e) the information is being collected to comply with a legal obligation, including an obligation to SARS, or
 - f) information collected is required for the conduct of proceedings in any court or tribunal, where these proceedings have commenced or are reasonably contemplated; or
 - g) the information is required to maintain our legitimate interests; or
 - h) where requesting consent would prejudice the purpose of the collection of the information; or
 - i) where requesting consent is not reasonably practical in the circumstances.
- 10.7. We shall advise our clients of the purpose of the collection of the personal information.
- 10.8. We shall retain records of the personal information we have collected for the minimum period as required by law unless the client has furnished their consent or instructed us to retain the records for a longer period.
- 10.9. We shall destroy or delete records of the personal information (to de identify the client) as soon as reasonably possible after the time period for which we were entitled to hold the records have expired.
- 10.10. We shall restrict the processing of personal information:
 - a) where the accuracy of the information is contested, for a period sufficient to enable us to verify the accuracy of the information;
 - b) where the purpose for which the personal information was collected has been achieved and where the personal information is being retained only for the purposes of proof;
 - c) where the client requests that the personal information is not destroyed or deleted, but rather retained; or
 - d) where the client requests that the personal information be transmitted to another automated data processing system.

- 10.11. The further processing of personal information shall only be undertaken:
- a) if the requirements of paragraphs 12.1 through 12.10 above have been met;
 - b) where the further processing is necessary because of a threat to public health or public safety or to the life or health of the client, or a third person;
 - c) where the information is used for historical, statistical or research purposes and the identity of the client will not be disclosed; or
 - d) where this is required by the Information Regulator appointed in terms of the POPIA.
- 10.12. We undertake to ensure that the personal information which we collect, and process is complete, accurate, not misleading and up to date.
- 10.13. We undertake to retain the physical file and the electronic data related to the processing of the personal information.
- 10.14. We undertake to take special care with our client's bank account details, and we are not entitled to obtain or disclose or procure the disclosure of such banking details unless we have the client's specific consent.

11. OUR CLIENT'S RIGHTS

- 11.1. In cases where the client's consent is required to process their personal information, this consent may be withdrawn.
- 11.2. In cases where we process personal information without consent to protect a legitimate interest, to comply with the law or to pursue or protect our legitimate interests, the client has the right to object to such processing.
- 11.3. All clients are entitled to lodge a complaint regarding our application of the POPIA with the Information Regulator.

12. CLIENTS REQUESTING RECORDS

- 12.1. On production of proof of identity, any person is entitled to request that we confirm, free of charge, whether we hold any personal information about that person in our records.
- 12.2. If we hold such personal information, on request, and upon payment of a fee we shall provide the person with the record, or a description of the personal information, including information about the identity of all third parties or categories of third parties who have or have had access to the information. We shall do this within a reasonable period, in a reasonable manner and in an understandable form.
- 12.3. A client requesting such personal information must be advised of their right to request to have any errors in the personal information corrected, which request shall be made on the prescribed application form.
- 12.4. In certain circumstances, we will be obliged to refuse to disclose the record containing the personal information to the client. In other circumstances, we will have discretion as to whether to do so.
- 12.5. In all cases where the disclosure of a record will entail the disclosure of information that is additional to the personal information of the person requesting the record, the written consent of the Information Officer (or his delegate) will be required, and that person shall make their decision having regard to the provisions of Chapter 4 of Part 3 of the PAIA.
- 12.6. If a request for personal information is made and part of the requested information may, or must be refused, every other part must still be disclosed.

13. THE CORRECTION OF PERSONAL INFORMATION

- 13.1. A client is entitled to require us to correct or delete personal information that we have, which is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or which has been obtained unlawfully.
- 13.2. A client is also entitled to require us to destroy or delete records of personal information about the client that we are no longer authorised to retain.
- 13.3. Any such request must be made on the prescribed form.
- 13.4. Upon receipt of such a lawful request, we must comply as soon as reasonably practicable.
- 13.5. If a dispute arises regarding the client's rights to have information corrected, and in the event that the client so requires, we must attach to the information, in a way that it will always be read with the information, an indication that the correction of the information has been requested but has not been made.
- 13.6. We must notify the client who has made a request for their personal information to be corrected or deleted what action we have taken as a result of such a request.

14. OFFENCES AND PENALTIES

- 14.1. POPI provides for serious penalties for the contravention of its terms:
 - 14.1.1. For minor offences a guilty party can receive a fine or be imprisoned for up to 12 months.
 - 14.1.2. For serious offences the period of imprisonment rises to a maximum of 10 years.
 - 14.1.3. Administrative fines for the company can reach a maximum of R10 million.
- 14.2. Breaches of this Manual will also be viewed as a serious disciplinary offence.
- 14.3. It is therefore imperative that we comply strictly with the terms of this Manual and protect our client's personal information in the same way as if it was our own.

15. FEES PAYABLE

- 15.1. The fees for reproduction of a record as referred to in Section 52(3).

16. INFORMATION OR RECORDS NOT FOUND

- 16.1. If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the GCOO of the Company or the Group Information Officer shall notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.
- 16.2. The affidavit or affirmation shall provide a full account of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the GCOO of the Company or the Group Information Officer with every person who conducted the search.
- 16.3. The notice, as set out in 11.1, shall be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act.
- 16.4. If the record in question 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 access is refused by the GCOO of the Company or the Group Information Officer.

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

17. INFORMATION REQUESTED ABOUT A THIRD PARTY

17.1. Section 71 of the Act makes provision for a request for information or records about a third party.

17.2. In considering such a request, the company will adhere to the provisions of Sections 71 to 74 of the Act.

17.3. The attention of the requester is drawn to the provisions of Chapter 5 of Part 3 of the Act in terms of which the Company is obliged, in certain circumstances, to advise third parties of requests lodged in respect of information applicable to or concerning such third parties. In addition, the provisions of Chapter 2 of Part 4 of the Act entitle third parties to dispute the decisions of the head of the company or the information officer by referring the matter to the High Court.

18. AVAILABILITY OF THE MANUAL

18.1. A copy of the Manual is available-

- a) On all subsidiary Websites;
 - o www.medipost.co.za
 - o www.medilogistics.co.za
 - o www.kawari.co.za
 - o www.meditraining.co.za
- b) Head office of the Medipost Holdings Group for public inspection during normal business hours;
- c) To any person upon request and upon the payment of a reasonable prescribed fee; and
- d) To the Information Regulator upon request.

18.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

19. UPDATING OF THE MANUAL

19.1. The appointed Information Officer will on a regular basis update this manual.

DOCUMENT CONTROL		DOCUMENT NO:
DOCUMENT REVISION CONTROL		
PAGE NUMBER/S	CHANGE LOCATED	DATE OF ISSUE
1; 3; 4; 6;10; 14;15;16;21	Approvers Updated Clause 1.2.4 Approvers Updated to GCOO Clause 3.2: 1736 staff changed to approximately 1589 IO and DIO Details Updated GCEO changed to GCOO where applicable Medilogistics details updated Clause 9.1 and 9.4 added	22/01/2026

