



**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE
PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 IN RESPECT OF
PLATINUM HEALTH MEDICAL SCHEME**

(A PRIVATE BODY)



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1 INTRODUCTION

- 1.1 This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act No.2 of 2000 ("**PAIA**").
- 1.2 The aim of the Manual is to assist potential Requesters to request access to information (documents, records and/or Personal Information) from Platinum Health Medical Scheme ("**Platinum Health**") as contemplated under PAIA.
- 1.3 The Manual may be amended from time to time and as soon as any amendments have been affected, the latest version of the Manual will be published and distributed in accordance with PAIA.
- 1.4 A Requester is invited to contact the Information Officer should he or she require any assistance in respect of the use or content of this Manual.
- 1.5 The definitions provided in this Manual are solely for the purpose of this Manual and are not to be taken as applicable to PAIA.

2 DEFINITIONS

The following words or expressions will bear the following meanings in this Manual –

- 2.1 "**Data Subject**" means the natural or juristic person to whom Personal Information relates;
- 2.2 "**Dependant**" means the spouse or partner, dependent children or other members of immediate family in respect of whom the Member is liable for family care and support; or any other person who, under the Platinum Health medical scheme rules is recognised as a dependent of a member, or the immediate family of a member other than the member's spouse or partner, who is not in receipt of a regular remuneration of more than the maximum social pension per month;
- 2.3 "**Designated Service Provider**" means a health care provider or group of health care providers selected and contracted by the medical scheme as its preferred service provider or providers to provide relevant health care services to its Members;
- 2.4 "**Employee**" means any person who works for, or provides services to, or on behalf of Platinum Health, and receives or is entitled to receive remuneration.
- 2.5 "**Information Officer**" means Platinum Health's designated information officer described in paragraph 6 of this Manual;
- 2.6 "**Information Regulator**" shall bear the meaning ascribed thereto in POPIA;

- 2.7 **"Manual"** means this manual, together with all annexures thereto as amended and made available at the offices of Platinum Health from time to time;
- 2.8 **"Medical Schemes Act"** means the Medical Schemes Act No. 131 of 1998, together with any regulations published thereunder;
- 2.9 **"Member"** means any person who is admitted as a Member of Platinum Health in terms of its medical scheme rules;
- 2.10 **"PAIA"** means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder;
- 2.11 **"Participating Employer"** is a company and/or associate company that mines platinum group metals and/or chrome which applies to the scheme for membership of its employees;
- 2.12 **"POPIA"** means the Protection of Personal Information Act No. 4 of 2013, together with any regulations published thereunder;
- 2.13 **"Personal Information"** has the meaning ascribed thereto under POPIA;
- 2.14 **"Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –
- 2.14.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- 2.14.2 dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or
- 2.14.3 merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, **"Process"** has a corresponding meaning;
- 2.15 **"Requester"** means any person or entity (including any Data Subject) requesting access to a record that is under the control of Platinum Health; and
- 2.16 **"Third-Party"** means any independent contractor, agent, consultant, sub-contractor or other representative of Platinum Health.

3 **SCOPE OF THE MANUAL**

This Manual has been prepared in respect of, and applies to, Platinum Health.

4 HOW TO USE PAIA TO ACCESS INFORMATION

(Information provided in terms of section 51(1) of PAIA)

- 4.1 PAIA grants a Requester 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 in terms of PAIA, the public body must be acting in the public interest.
- 4.2 Requests in terms of PAIA shall be made in accordance with the prescribed procedures, and at the prescribed fees.
- 4.3 A guide on how to use PAIA is required to be compiled by the Information Regulator and when same is available, will be accessible (in various official languages) on the Information Regulator's website or you may request a copy of the guide from us by contacting our Information Officer. You may also direct any queries to:

The Information Regulator of South Africa

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

E-mail: inforeg@justice.gov.za / PAIAComplaints.IR@justice.gov.za /

POPIAComplaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/index.html>

Tel: 012 406 4818

Fax: 086 500 3351

5 OVERVIEW OF THE STRUCTURE AND FUNCTIONS OF PLATINUM HEALTH

- 5.1 Platinum Health is a non-profit restricted medical scheme registered in terms of the Medical Schemes Act with registration number 29/4/2/1583.
- 5.2 Platinum Health is registered as a closed medical scheme, with membership being restricted to the Members, Dependants and employees of certain Participating Employer groups.
- 5.3 The objects of the scheme are to undertake liability in respect of its Members and their Dependants, in return for a contribution or premium –
 - 5.3.1 To make provision for obtaining any relevant health service;
 - 5.3.2 To grant assistance in defraying expenditure incurred in connection with the rendering of any relevant health service; and/or
 - 5.3.3 To render a relevant health service, either by Platinum Health itself, or by any supplier or group of suppliers of a relevant health service or by any person in association with, or in terms of an agreement with, Platinum Health.
- 5.4 Platinum Health operates a Staff Model Health Maintenance Organisation, which provides health services including primary, secondary and tertiary healthcare, dentistry, mental health, physiotherapy and optometry in accordance with medical scheme benefits, HIV/AIDS

management, chronic disease management, medical scheme administration, case management and client liaison. Platinum Health offers three options, namely PlatComprehensive, PlatCap and PlatFreedom. Platinum Health has entered into fixed fee contracts with a number of specialists in Rustenburg for the rendering of specialist health services to its Members.

- 5.5 Platinum Health has entered into capitation fee contracts with a number of Participating Employer companies for the rendering of work-based services to the employees and contractors of the Participating Employer groups. The services include occupational health care, rehabilitation and functional assessment, curative care and trauma services (casualty) emergency medical services., primary health care as well as wellness programs. These services are rendered at the Participating Employer's premises at favourable conditions to Platinum Health and accounted for under own faculty surplus.

6 PLATINUM HEALTH'S CONTACT DETAILS

(Information required under section 51(1)(a) of PAIA)

Name of Body:	Platinum Health Medical Scheme
Physical & Postal Addresses:	Physical: Platinum Health Medical Scheme, 03 Kgwebo Street, Mabe Park, Rustenburg Postal: Private Bag X82081, Rustenburg, 0300
Information Officer	Name: Rodney Gounden E: privacy@platinumhealth.co.za
Deputy Information Officer	Name: Natasha Kamaar E: privacy@platinumhealth.co.za
Telephone Number:	087 463 0660
Website Address:	https://www.platinumhealth.co.za/

7 PLATINUM HEALTH'S PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

(Information required under section 51(1)(c) of PAIA)

7.1 Purpose of Platinum Health's Processing of Personal Information

- 7.1.1 Platinum Health will process Personal Information only in ways that are for, or compatible with, the business purposes for which the data was collected or that are subsequently authorised by the relevant Data Subject.

Platinum Health will retain Personal Information only for as long as is necessary to accomplish Platinum Health's legitimate business purposes or for as long as may be permitted or required by applicable law.

7.1.3 We use the Personal Information we collect to (i) serve our Members, their Dependants, and Participating Employer groups , and market and promote our products or services; and (ii) generally to enable us operate and manage our normal operations and these purposes include the following non-exhaustive purposes -

7.1.3.1 generally for the purposes of providing its services as a medical scheme to Members and Dependants, as per the rules of the medical scheme. This includes administration of the medical scheme, case management and client liaison;

7.1.3.2 for the purposes of providing its services as a Staff Model Health Maintenance Organisation, including the provision of primary, secondary and tertiary healthcare, dentistry, mental health, physiotherapy and optometry in accordance with medical scheme benefits, HIV/AIDS management, and chronic disease management, as well as work based health services including occupational healthcare, rehabilitation and functional assessment, trauma, emergency medical services and workplace wellness programs at Participating Employers' premises;

7.1.3.3 for purposes of onboarding suppliers, service providers or Designated Service Providers as approved suppliers/service providers of Platinum Health. For this purpose, Platinum Health will also Process a service provider's/supplier's Personal Information for purposes of performing the necessary due diligence checks;

7.1.3.4 in order to conduct due diligence processes on, *inter alia*, potential service providers, counterparties and/or participants in Platinum Health's corporate social responsibility initiatives;

7.1.3.5 in order to comply with obligations imposed on the Platinum Health under the Based Black Economic Empowerment Act, No. 53 of 2003 ("**BEE Act**") read together with the Department of Trade and Industry's Codes of Good Practice on Broad-Based Black Economic Empowerment published in terms of Government Gazette No. 36928 on 11 October 2013 under section 9(1) of the BEE Act, as amended or reissued from time to time;

7.1.3.6 in order to comply with Platinum Health's investment and/or procurement strategies and/or initiatives;

7.1.3.7 in order to ensure that the relevant financial and ESG (Environmental, Social and Governance) obligations are complied with (which obligations flow from the relevant legal agreements);

- 7.1.3.8 generally for procurement and supply purposes;
- 7.1.3.9 for purposes of monitoring the use of Platinum Health's electronic systems and online platforms by Data Subjects. Platinum Health will, from time to time, engage third party service providers (who will Process the Data Subject's Personal Information on behalf of Platinum Health) to facilitate this;
- 7.1.3.10 for purposes of preventing, discovering and investigating violations of this Policy, the applicable law and other Platinum Health policies;
- 7.1.3.11 in connection with the execution of payment processing functions, including payment of Platinum Health's suppliers'/service providers' invoices;
- 7.1.3.12 for employment-related purposes such as recruiting staff, administering payroll, background checks, etc.;
- 7.1.3.13 in connection with internal audit purposes (i.e. ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);
- 7.1.3.14 in connection with external audit purposes. For this purpose, Platinum Health engages external service providers and, in so doing, shares Personal Information of the Data Subjects with third parties;
- 7.1.3.15 in order to address inquiries or complaints in respect of Platinum Health's products, services or functions;
- 7.1.3.16 for the purposes of engaging in corporate social responsibility initiatives;
- 7.1.3.17 for such other purposes to which the Data Subject may consent from time to time;
- 7.1.3.18 for such other purposes as authorised in terms of applicable law; and
- 7.1.3.19 to comply with any applicable law.
- 7.2 Platinum Health will not use the Personal Information which we collect for any purposes other than those purposes specified in paragraph 7.1.3 above.
- 7.3 **Categories of Data Subjects and of the Personal Information relating thereto**
- 7.3.1 Platinum Health collects Personal Information directly from the Data Subject and/or from Third Parties, and where Platinum Health obtains Personal Information from Third Parties, Platinum Health will ensure that it obtains the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where Platinum Health is permitted to do so in terms of the applicable laws.

Data Subjects in respect of which Personal Information is Processed include Members, Dependants, Participating Employer groups, employees and prospective Members, and service providers or Designated Service Providers.

7.3.3 Examples of Third Parties from whom Personal Information is collected include; regulatory bodies; other companies providing services to Platinum Health and where Platinum Health makes use of publicly available sources of information.

7.4 **Recipients or categories of recipients to whom Personal Information may be supplied**

7.4.1 Platinum Health may share your Personal Information with affiliated companies, third parties engaged by us, or our business partners, to assist us to provide information, goods or services to you. Such third parties or business partners may include –

7.4.1.1 Associated health care providers, clinics and pharmacies;

7.4.1.2 logistics providers;

7.4.1.3 information technology hosting, data storage or archiving service providers, payment processing and debt collection services;

7.4.1.4 professional advisors; and

7.4.1.5 marketing, research and advertising agencies.

7.4.2 Further, Platinum Health may be required to disclose Personal Information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any Court or Tribunal. We may disclose Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Platinum Health, our Members, or others.

Platinum Health will comply with POPIA before transferring Personal Information to a Third-Party who is a contractor of Platinum Health. Before transferring Personal Information to a Third-Party contractor, such as an authorised service provider, Platinum Health will obtain assurances from the Third-Party that it will process Personal Information in a manner consistent with POPIA. Where Platinum Health learns that a Third-Party contractor is using or disclosing Personal Information in a manner contrary to POPIA, Platinum Health will take reasonable steps to prevent such use or disclosure.

7.4.4 We reserve the right to disclose and transfer a Data Subject's information, including their Personal Information in connection with a corporate merger, consolidation, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

7.5 **Planned Transborder Flows of Personal Information**

In carrying out any cross-border transfers, Platinum Health shall adhere to the provisions of POPIA.

7.6 **Information Security Measures**

7.6.1 The security and confidentiality of Personal Information is important to Platinum Health. We have implemented reasonable technical, administrative, and physical security measures to protect Personal Information from unauthorised access or disclosure and improper use.

7.6.2 We are committed to ensuring that our security measures which protect your Personal Information are continuously reviewed and updated where necessary.

7.6.3 In Processing any Personal Information, Platinum Health shall comply with the following minimum technical and organisational security requirements.

7.6.3.1 **Physical Access** – Access to Personal Information is restricted in our offices (in senior Employees' offices), under lock and key, and only to those Employees who need the Personal Information to perform a specific job / task.

7.6.3.2 **Employee Training** – All Employees with access to Personal Information are kept up-to-date on our security and privacy practices. After a new policy is added, these Employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for the Personal Information of all Data Subjects.

7.6.3.3 **Unique User Identification** – Employees each have a unique user ID assigned to them, subject to strict confidentiality undertakings in terms of Platinum Health's password, access control and confidentiality policies.

Passwords – Platinum Health shall ensure that there are passwords required for any access to Personal Information in line with its password policy.

7.6.3.5 **Physical access and privileges** – Platinum Health ensures that access to Personal Information is limited to Employees on a "need to know" basis, and Platinum Health Employees are required to strictly utilise their unique user ID and applicable passwords to access same.

7.6.3.6 **Systems Review** – Platinum Health conducts regular reviews of its technical and organisational security measure system in order to ensure that all of the above security measures are functioning effectively and applied consistently.

8 INFORMATION HELD BY PLATINUM HEALTH IN TERMS OF PAIA

(Information required under section 51(1)(e) of PAIA)

8.1 This section of the Manual sets out the categories and descriptions of records held by Platinum Health. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under PAIA. In particular, certain grounds of refusal as set out in PAIA may be applicable to a request for such records.

8.2 Medical scheme records

8.2.1 Medical scheme rules

8.2.2 Medical scheme registration documents

8.2.3 Founding/vision and mission statement

8.2.4 Minutes of meetings

8.2.5 Licenses

8.2.6 Certification, professional qualifications and registration

8.3 Accounting records

8.3.1 Details of accounting officer or auditors

8.3.2 Formal books of account and financial statements

8.3.3 Source documents

8.3.4 Customs, excise and logistics

8.3.5 Banking records

8.3.6 Management reports

Medical scheme tax returns

8.4 **Supplier records**

8.4.1 Supplier onboarding and vetting information

8.4.2 Account and payment details

8.4.3 Contact person details

8.5 **Member records**

8.5.1 Onboarding information

8.5.2 Dependant information

8.5.3 Health information

8.5.4 Account records

8.5.5 Claims records

8.6 **Participating Employer group records**

8.6.1 Employee/Member records

8.6.2 Account records

8.6.3 Claims records

8.6.4 Occupational medical services records

8.7 **Human Resources records**

8.7.1 Employee policies

8.7.2 Pension funds

8.7.3 Recruitment

8.7.4 Health and safety documentation

8.7.5 Workplace Skills Plans (WSP)

8.7.6 Annual Training report

8.8 **Operations records**

8.8.1 Specifications

8.8.2 Procedures



8.8.3 Plans

8.8.4 Stock records

8.8.5 Asset register

8.8.6 Corporate social investment / charity / BEE work done

9 INFORMATION KEPT BY PLATINUM HEALTH IN ACCORDANCE WITH OTHER LEGISLATION

(Information required under section 51(1)(b)(iii) of PAIA)

9.1 Records are kept in accordance with legislation applicable to Platinum Health, which includes but is not limited to, the following:

9.1.1 Basic Conditions of Employment Act 75 of 1997

9.1.2 Broad-Based Black Economic Empowerment Act, No. 53 of 2003

9.1.3 Companies Act 71 of 2008

9.1.4 Compensation for Occupational Injuries and Diseases Act 130 of 1993

9.1.5 Competition Act 89 of 1998

9.1.6 Constitution of the Republic of South Africa, 1996

9.1.7 Consumer Protection Act 68 of 2008

9.1.8 Copyright Act 98 of 1987

9.1.9 Council for Medical Schemes Levies Act, No. 58 of 2000

9.1.10 Dental Technicians Act 19 of 1979

9.1.11 Electronic Communications and Transactions Act 25 of 2002

9.1.12 Employment Equity Act 55 of 1998

9.1.13 Health Professions Act 56 of 1974

9.1.14 Income Tax Act 58 of 1962 (Section 75)

9.1.15 Insolvency Act 24 of 1936

9.1.16 Labour Relations Act 66 of 1995

9.1.17 Medical Schemes Act 131 of 1998



- 9.1.18 Medicines and Related Substances Act, No. 101 of 1965
- 9.1.19 Mental Health Care Act No.17 of 2002
- 9.1.20 National Credit Act 34 of 2005
- 9.1.21 Mine Health and Safety Act
- 9.1.22 National Health Act, No. 61 of 2003
- 9.1.23 Nursing Act, No. 33 of 2005
- 9.1.24 Occupational Health and Safety Act 85 of 1993
- 9.1.25 Pharmacy Act No. 53 of 1974
- 9.1.26 Promotion of Access to Information Act 2 of 2000
- 9.1.27 Pension Funds Act 24 of 1956
- 9.1.28 Protection of Personal Information Act 4 of 2013
- 9.1.29 Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- 9.1.30 Skills Development Act 97 of 1998
- 9.1.31 Tax Administration Act 28 of 2011
- 9.1.32 Tax on Retirement Funds Act 38 of 1996
- 9.1.33 Trademarks Act 194 of 1993
- 9.1.34 Unemployment Insurance Act, No. 63 of 2001
- 9.1.35 Unemployment Insurance Contributions Act, No. 4 of 2002
- 9.1.36 Value Added Tax Act 89 of 1991
- 9.2 Records kept in terms of the above legislation may, in certain instances (and insofar as the information contained therein is of a public nature) be available for inspection without a person having to request access thereto in terms of PAIA.

10 REQUEST PROCEDURES

- 10.1 Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA.
- 10.2 **Form of request**

The Requester must use the prescribed form to make the request for access to a record, which form is attached hereto as Annexure "A". This must be made to the Information Officer at the address or electronic mail address of the body concerned (*see s 53(1) of PAIA*).

10.2.2 The Requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requester. The Requester should also indicate which form of access is required and specify a postal address, fax number in the Republic or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed (*see s 53(2)(a) and (b) and (c) and (e) of PAIA*).

10.2.3 The Requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right (*see s 53(2)(d) of PAIA*).

10.2.4 If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of the private body (*See s 53(2)(f) of PAIA*).

10.3 **Fees**

10.3.1 Request fees:

10.3.1.1 The Information Officer must by notice require the Requester to pay the prescribed request fee (if any) before further processing the request (*see s 54(1) of PAIA*).

10.3.1.2 The fee that the Requester must pay to a private body is [R50]. The Requester may lodge an application to the court against the tender or payment of the request fee (*See section 54(3)(b) of PAIA*).

10.3.2 Access fees and fees for reproduction:

10.3.2.1 If access to a record/s is granted by Platinum Health, the Requester may be required to pay an access fee for the search for and preparation of the records and for reproduction of the record/s. (*See section 54(6) of PAIA*)

10.3.2.2 The access fees which apply are set out below. Platinum Health can refuse access until such access fees have been paid. (*See section 54(5) of PAIA*)

	Reproduction	Fee (Rand)
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1.	Photocopy of an A4-size page or part thereof provided in hard copy or via scanned copy sent via email	R1.10 per page
2.	Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75 per page
3.	A copy of, in a computer readable form on compact disc	R70.00
4.	Transcription of visual images on an A4-size page or part thereof	R40.00 per page
5.	Copy of visual images	R60.00
6.	Transcription of an audio record on an A4-size page or part thereof	R20.00
7.	Copy of an audio record	R30.00

10.4 Decision on request

10.4.1 After the Information Officer has made a decision on the request, the Requester will be notified using the required form. (*See section 56(1)(b) of PAIA*)

10.4.2 If the request is granted, then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure (*see s 54(6) of PAIA*).

11 TIMELINES FOR CONSIDERATION OF A REQUEST

(*See section 56 and 57 of PAIA*)

11.1 Requests for access by a Requester will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is necessary. Such considerations include –

11.1.1 where the request is for a large number of records or requires a search through a large number of records (including where records that have been archived electronically need to be restored) ;

11.1.2 where the request requires a search for records in, or collection of such records from, an office of Platinum Health located far away from [Rustenburg];

- 11.1.3 consultation among divisions of Platinum Health or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original 30-day period;
- 11.1.4 more than one of the circumstances contemplated in paragraphs 11.1.1, 11.1.2 and 11.1.3, exist in respect of the request making compliance with the original period not reasonably possible; or
- 11.1.5 the Requester consents in writing to such extension.
- 11.2 If an extension is necessary, you will be notified with reasons for the extension. If the Information Officer fails to communicate a decision on a request, such a request is then deemed to have been refused.

12 GROUNDINGS FOR REFUSAL OF ACCESS TO RECORDS

(See chapter 4 of Part 3 of PAIA)

- 12.1 Requests for access by a Requester **must** be refused by the Information Officer if –
- 12.1.1 the disclosure would involve the unreasonable disclosure of personal information about a third party (natural person), including a deceased individual (*See section 63 of PAIA*);
- 12.1.2 the record contains (a) trade secrets of a third party, (b) financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party, or (c) information supplied in confidence by a third party the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations; or to prejudice that third party in commercial competition (*See section 64 of PAIA*);
- 12.1.3 the disclosure of the record would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement (*See section 65 of PAIA*);
- 12.1.4 the disclosure could reasonably be expected to endanger the life or physical safety of an individual (*see section 66(a) of PAIA*);
- 12.1.5 the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege (*See section 67 of PAIA*); or
- 12.1.6 the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose: (a) the third party; (b) a person that is or will be carrying out the research on behalf of the third party; or (c) the subject matter of the research, to serious disadvantage (*See section 69 of PAIA*).
- 12.2 Requests for access by a Requester may be refused by the Information Officer if –

the disclosure would be likely to prejudice or impair: (i) the security of: (aa) a building, structure or system, including, but not limited to, a computer or communication system; (bb) a means of transport; or (cc) any other property; or (ii) methods, systems, plans or procedures for the protection of: (aa) an individual in accordance with a witness protection scheme; (bb) the safety of the public, or any part of the public; or (cc) the security of property contemplated in subparagraph (i) (aa), (bb) or (cc) (*See section 66(b)*);

12.2.2 the record:

- (a) contains trade secrets of Platinum Health;
- (b) contains financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of Platinum Health;
- (c) contains information, the disclosure of which could reasonably be expected:
 - (i) to put Platinum Health at a disadvantage in contractual or other negotiations;
or
 - (ii) to prejudice Platinum Health in commercial competition; or
- (d) is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by Platinum Health, except insofar as it is required to give access to a record to which access is granted in terms of PAIA; (*See section 68(1) of PAIA*) or

12.2.3 the record contains information about research being or to be carried out by or on behalf of Platinum Health, the disclosure of which would be likely to expose: (a) Platinum Health; (b) a person that is or will be carrying out the research on behalf of Platinum Health; or (c) the subject matter of the research, to serious disadvantage. (*See section 69(2) of PAIA*)

13 REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

13.1 Platinum Health does not have any internal appeal procedures that may be followed once a request to access information has been refused.

13.2 The decision of the Information Officer or deputy information officer is final.

13.3 If you are not satisfied with the outcome of your request, you are entitled to apply to a court of competent jurisdiction to take the matter further. (*See section 78 of PAIA*)

14 OTHER INFORMATION HELD BY PLATINUM HEALTH AS PRESCRIBED

(Other information as may be prescribed under section 51(1)(a)(ii))

The Minister of Justice and Constitutional Development has to date not made any regulations regarding disclosure of other information.

15 AVAILABILITY OF THE MANUAL

(Availability of Manual under section 51(3))

- 15.1 This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of Platinum Health and on the Platinum Health website at <https://www.platinumhealth.co.za/>. Copies of the Manual may be made, subject to the prescribed fees.

16 THE MANUAL WILL BE MADE AVAILABLE TO THE INFORMATION REGULATOR UPON REQUEST. PRESCRIBED FORMS AND FEE STRUCTURE

(Prescribed forms and fee structure in respect of private bodies)

The forms prescribed under PAIA are available from the Government Gazette 23119, RG 7278, Government Notice R187, 15 February 2002 under Part III of Annexure A, or at the website of the Department of Justice and Constitutional Development at <https://www.justice.gov.za/paia/paia.htm> under "Forms". The fee structure prescribed under PAIA is available from the Government Gazette 23119, RG 7278, Government Notice R187, 15 February 2002, under Annexure B, or at the website of the Department of Justice and Constitutional Development at <https://www.justice.gov.za/paia/paia-faq.htm> under "Request for Records of Private Body".

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

D. Particulars of record

- (a) 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.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

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2. Reference number, if available:

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3. Any further particulars of record:

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E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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 for exemption from payment of fees:

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FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Mark the appropriate box with an X.	
NOTES:	
(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
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G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.
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1. Indicate which right is to be exercised or protected:

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2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

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FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

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Signed at this day..... ofyear

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SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE