PAIA MANUAL

PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT 2 OF 2000) AND TO ADDRESS THE REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 ("POPIA")

Version 2.0 | Date of compilation: November 2021 | Next review: November 2027

National Health Group (Pty) Ltd
2nd Floor, PPS Centurion Square, Cnr Heuwel Road and Gordon Hood Road, Centurion, 0046
info@nationalhealthcare.co.za www.nationalheathcare.co.za

WhatsApp +27 72 815 8226
Tel: +27 86 000 2402

National Health Group (Pty) Ltd (2015/130345/07), a registered Managed Care Organisation (MCO110) and Administrator (ADMIN72)
Directors: R Nauta (Executive Chairman), M Moyo (Channel Partner Executive), A Odendaal (Chief Executive Officer)
L Motlana (Non-Executive), T van den Berg (Non-Executive), K Starke-Dow (Alternate)

Reg No 2015/130345/07
National Health Group (Pty) Ltd

TABLE OF CONTENTS

1. Introduction to the Group 3
2. Contact Details of the Group 4
3. Guide of the Information Regulator 4
4. Records Held by the Group 5
5. Information Available in Terms of Legislation 6
6. Records Automatically Available 7
7. Purpose of Processing Personal Information 7
8. Data Subjects, Their Personal Information and Potential Recipients of Information 8
9. Personal Information Sent Across the Borders of the Republic of South Africa 9
10. Security Measures to Protect Personal Information 9
11. Procedure to Obtain Access to Records or Information 10
12. Fees Payable to Obtain the Requested Records or Information 11
13. Remedies 12
14. Processing of Personal Information: Objection, Correction and Deletion 12
15. Availability of this Manual 12

1. INTRODUCTION TO THE GROUP

National Health Group (Pty) Ltd (NHG), trading as National Healthcare Group, is a legally registered Managed Care Organisation and Healthcare Administrator that was established to offer affordable and reliable private primary healthcare services to low-income employer groups, insurers and the medical scheme industry, through its own national network of independent healthcare providers. National Healthcare Group also provides digital healthcare services, including consultations with nurses and doctors by WhatsApp and telephone. As an administrator and managed care organisation National Healthcare Group is accredited by and subject to the authority of the Council for Medical Schemes (CMS).

This Manual promotes transparency and accountability by setting out how National Healthcare Group protects the personal information it needs to carry out its business. It describes the records held by National Healthcare Group, the measures taken to protect personal information and the procedure to follow when requesting access to any of these records.

DEFINITIONS

Unless the context clearly indicates otherwise, the following terms have the meanings assigned to them below:

- "**Act**" or "**PAIA**" means the Promotion of Access to Information Act 2 of 2000, as amended from time to time;
- "**Group**" means National Health Group (Pty) Ltd (NHG), trading as National Healthcare Group;
- "**Guide**" means the Guide on how to use PAIA published by the Information Regulator under section 10 of PAIA;
- "**Information Officer**" means the head of the Group as defined in section 1 of PAIA, or the person duly authorised by the head to act as such, and includes any Deputy Information Officer;
- "**Information Regulator**" or "**Regulator**" means the Information Regulator (South Africa) established under section 39 of POPIA;
- "**Manual**" means this manual, published in compliance with section 51 of PAIA;
- "**POPIA**" means the Protection of Personal Information Act 4 of 2013 and its Regulations, as amended;
- "**Record**" means any recorded information, regardless of form or medium, in the possession or under the control of the Group, whether or not it was created by the Group;
- "**Regulations**" means the Regulations relating to the Promotion of Access to Information, 2021 (GN R757 of 27 August 2021);

- "**Request**" means a request for access to a Record of the Group; and
- "**Requester**" means any person, including a public body or an official thereof, making a Request, and includes any person acting on behalf of that person.

Unless a contrary intention clearly appears, the singular includes the plural and vice versa, any one gender includes the other genders, and natural persons include juristic persons. Terms defined in PAIA have the same meaning in this Manual.

2. CONTACT DETAILS OF THE GROUP

Company name:	National Health Group (Pty) Ltd, trading as National Healthcare Group
Registration number:	2015/130345/07
Physical address:	PPS Centurion Square, Corner Heuwel & Gordon Hood Roads, 0046
Postal address:	Postnet Suite 203, Private Bag X8, Elarduspark, 0047
Telephone:	021 276 5600
Customer care:	0860 002 402 / nhgcustomercare@nationalhealthcare.co.za
WhatsApp:	072 815 8226
Compliance e-mail:	compliance@nationalhealthcare.co.za
Website:	www.nationalhealthcare.co.za
Information Officer:	Adriaan Odnedaal, Chief Executive Officer
Deputy Information Officer:	Mandlenkosi Moyo, Channel Partner Executive

3. GUIDE OF THE INFORMATION REGULATOR

The Information Regulator has published a Guide, in terms of section 10 of PAIA, to assist persons wishing to exercise their rights under PAIA and POPIA. The Guide contains, amongst others, the following information:

- the purpose of PAIA and POPIA;
- the manner, form and costs of a request for access to information held by a body;
- the assistance available from the Information Officer and the Information Regulator;
- when access to information may be refused, and the legal remedies when it is refused, including complaints to the Information Regulator; and
- the contact details of Information Officers of public bodies.

The Guide is available in all the official languages on the Information Regulator's website at www.inforegulator.org.za, and may be inspected at our offices during normal working hours.

A copy may be requested from our Information Officer or from the Information Regulator using Form 1 of the Regulations. The Information Regulator's contact details are:

Physical address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address:	PO Box 31533, Braamfontein, Johannesburg, 2017
Telephone:	010 023 5200 / Toll-free: 0800 017 160
General enquiries:	enquiries@inforegulator.org.za
POPIA complaints:	POPIAComplaints@inforegulator.org.za or the eServices Portal
PAIA complaints:	PAIAComplaints@inforegulator.org.za (PAIA Form 5)
Website:	www.inforegulator.org.za

4. RECORDS HELD BY THE GROUP

The Group holds the following categories of records:

4.1 **Records relating to the formation of the Group:**

Documents related to the establishment of the company, CIPC documents, memorandum of incorporation, directors' and shareholders' records as required in terms of the Companies Act 71 of 2008; shareholders' agreement; shareholders' register; other statutory records; governance documents (e.g., company policies, minutes of meetings) and other related documents.

4.2 **Employment records:**

Employment contracts; conditions of employment and workplace policies; skills development plans and training records; salary register; relevant tax records; leave records; medical scheme membership records; pension and provident fund records; performance indicators and other correspondence.

4.3 **Health administration records:**

Member and dependant records; medical records; healthcare benefits; consultation records and chat histories from the clinical line, WhatsApp and telephonic services; call recordings; patient communication; claim and payment records; and correspondence with members and healthcare providers.

4.4 **Referral records:**

Doctor referral notes and other relevant reports.

4.5 **Clinical trial / research studies records:**

No records are kept by the Group related to clinical trials / research studies.

4.6 **Health and safety records:**

Health and safety reports and other records required by law.

4.7 **Financial records:**

Financial statements; auditors' reports; accounting records; bank statements; invoices, statements and receipts; remittance advices; tax returns and related documentation.

4.8 **Records related to assets:**

Asset register; purchase records; licences; financing and lease agreements; sale and purchase agreements; delivery notes and orders.

4.9 **Agreements:**

Agreements and related documentation with contractors, consultants, suppliers, brokers, vendors, medical schemes, insurers, employer groups, network providers and other business-related agreements.

4.10 **Public and private body (e.g., regulators, insurers and medical schemes) records:**

Official accreditation documents; benefit schedules and healthcare administration correspondence.

4.11 **Insurance records (including professional indemnity cover):**

Policies, cover, claims and related records.

4.12 **Information technology and information security records:**

IT policies, system access records, security incident records and records of security compromises reported to the Information Regulator.

5. INFORMATION AVAILABLE IN TERMS OF LEGISLATION

The Group holds records as may be required in terms of the following legislation, subject to the specific protection offered by these laws:

1. Basic Conditions of Employment Act 75 of 1997;
2. Broad-Based Black Economic Empowerment Act 53 of 2003;
3. Children's Act 38 of 2005;
4. Companies Act 71 of 2008;
5. Compensation for Occupational Injuries and Diseases Act 130 of 1993;
6. Consumer Protection Act 68 of 2008;
7. Cybercrimes Act 19 of 2020;
8. Electronic Communications and Transactions Act 25 of 2002;
9. Employment Equity Act 55 of 1998;
10. Health Professions Act 56 of 1974;
11. Income Tax Act 58 of 1962;

12. Insurance Act 18 of 2017;
13. Labour Relations Act 66 of 1995;
14. Long-term Insurance Act 52 of 1998;
15. Medical Schemes Act 131 of 1998;
16. Medicines and Related Substances Act 101 of 1965;
17. National Health Act 61 of 2003;
18. Occupational Health and Safety Act 85 of 1993;
19. Promotion of Access to Information Act 2 of 2000;
20. Protection of Personal Information Act 4 of 2013;
21. Short-term Insurance Act 53 of 1998;
22. Skills Development Act 97 of 1998;
23. Skills Development Levies Act 9 of 1999;
24. Tax Administration Act 28 of 2011;
25. Trade Marks Act 194 of 1993;
26. Unemployment Insurance Act 63 of 2001;
27. Unemployment Insurance Contributions Act 4 of 2002; and
28. Value-Added Tax Act 89 of 1991.

6. RECORDS AUTOMATICALLY AVAILABLE

No notice has been submitted by the Group to the Minister of Justice and Constitutional Development regarding the categories of records which are available without a person having to request access in terms of section 52(2) of PAIA. However, the information on the Group's website, including its Privacy Policy and this Manual, is automatically available. Access to and use of the website are subject to the Website Terms and Conditions and the Privacy Policy of the Group.

7. PURPOSE OF PROCESSING PERSONAL INFORMATION

The Group processes personal information of data subjects for the following purposes:

7.1 to conduct and manage the Group in accordance with the law, including administering benefits and claiming and collecting payment for services rendered from employers, medical schemes, insurers and responsible persons or entities;

7.2 for treatment, managed care and the administration of member benefits, including consultations by WhatsApp, telephone and in person;

7.3 for communication with members, providers and clients;

7.4 for the maintenance of Group records and members' medical records;

7.5 for employment and related matters of employees;

7.6 for reporting to persons and bodies, including practitioners and providers, as required and authorised in terms of the law or by the data subjects;

7.7 for the detection and prevention of fraud, waste and abuse;

7.8 for quality assurance and training, including call recordings;

7.9 for historical and statistical purposes, using de-identified information where possible;

7.10 for the enforcement of the Group's rights; and

7.11 for any other lawful purpose related to the activities of the Group.

8. DATA SUBJECTS, THEIR PERSONAL INFORMATION AND POTENTIAL RECIPIENTS OF INFORMATION

The Group holds personal information about the categories of data subjects below, as may be relevant in the circumstances. Information and records are only disclosed to recipients where necessary and authorised in terms of the law, or with the consent of the relevant data subjects.

Data subjects	Categories of personal information	Potential recipients
Employees	Full names; titles; contact details; addresses; identity numbers; race; gender; nationality; qualifications; registered professions; statutory council registration numbers; employment information; CVs; references; relevant health information; health and safety incidents; leave records; remuneration; benefits; bank details; tax numbers; next-of-kin details and correspondence.	Relevant employees; SARS; statutory and public bodies (e.g., Department of Employment and Labour, UIF); medical schemes; insurers; pension and provident funds; banks; professional bodies; legal and professional advisers; auditors; law enforcement structures; executors of estates; potential purchaser of the company.
Job applicants	Names; titles; CVs; contact details; addresses; identity numbers; race; gender; nationality; qualifications; registered professions; statutory council numbers; employment history; interview notes; vetting results; references and correspondence.	Relevant employees; recruitment agencies; vetting agencies; legal and professional advisers; auditors; law enforcement structures.

Data subjects	Categories of personal information	Potential recipients
Medical scheme, insurer and employer group members and their dependants	Names; titles; contact details (including WhatsApp numbers); addresses; identity numbers and dates of birth; gender; nationality; employer details; medical history; health information, including diagnoses, consultations, chat histories and procedures; photographs; referral notes; adverse events; next-of-kin, guarantor or authorised person's details; premiums and amounts due; call recordings and correspondence.	Treating and referring practitioners and network providers; relevant employees; medical schemes; insurers; employer groups (limited to non-clinical administration information unless the member consents); hospitals; statutory and public bodies (e.g., the Compensation Commissioner, the Road Accident Fund, CMS); messaging and IT service providers; actuaries; legal and professional advisers; auditors; debt collectors; law enforcement structures; potential purchaser of the company.
Referring practitioners and network providers	Names; titles; contact details; addresses; practice and company registration numbers (including PCNS); registered professions; bank account details and correspondence.	Relevant employees; members; statutory and public bodies; medical schemes; insurers; auditors; legal and professional advisers; law enforcement structures; potential purchaser of the company.
Hospitals and other healthcare providers	Names; contact details; contact persons' details; website addresses; registration numbers (including PCNS); facility-related information and correspondence.	Practitioners; relevant employees; auditors; legal and professional advisers; potential purchaser of the company.
Contractors, vendors and suppliers	Names; organisation details; contact persons' details; addresses; opinions; correspondence; price structures; financial arrangements; bank details and VAT numbers.	Relevant employees; banks; auditors; legal and professional advisers; law enforcement structures; potential purchaser of the company.
Medical schemes, insurers and employer groups (clients)	Names and contact details; office bearers; premiums; benefits; rules; payment information and correspondence.	Relevant employees; actuaries; auditors; legal and professional advisers; relevant public bodies; law enforcement structures; potential purchaser of the company.
Public and private bodies (e.g., regulators, funders)	Names; contact details; office bearers; fee and benefit structures; rules; public-domain information; payment information and correspondence.	Relevant employees; legal and professional advisers; auditors; law enforcement structures; potential purchaser of the company.
Website and WhatsApp users	Mobile numbers; names; messages; device and usage information; cookies.	Relevant employees; messaging, hosting and IT service providers.

9. PERSONAL INFORMATION SENT ACROSS THE BORDERS OF THE REPUBLIC OF SOUTH AFRICA

The Group stores electronic information, including personal information, using cloud and hosted services, and communicates with members through messaging platforms such as WhatsApp. Some of these service providers may store or process information on servers outside the Republic. Due care is taken in selecting these providers, and transfers occur only in accordance with section 72 of POPIA: where the recipient is subject to a law, binding corporate rules or a binding agreement providing an adequate level of protection; with the data subject's consent; or where the transfer is necessary for the performance of a contract with, or in the interest of, the data subject.

Members living or travelling outside the Republic may require their personal information to be transferred to treating providers in another country. This will be done with the member's consent and within the boundaries of the relevant privacy laws.

10. Security Measures to Protect Personal Information

The Group is committed to securing the personal information in its possession or under its control against unauthorised processing and access, loss, damage or unauthorised destruction. It continually reviews and updates its information protection measures in line with generally accepted information security practices. These include technical and organisational measures such as physically secured offices; locked cabinets for paper records; access controls and passwords for electronic records; encryption; secure hosting; security monitoring; and off-site back-ups.

Only practitioners and employees who require access to information to treat members and perform their functions are given access, and only if they have signed agreements or undertakings to apply appropriate security measures and keep the information confidential. Suppliers and operators must adhere to the Group's policies and are subject to sanctions for any security breach.

Security compromises are reported to the Information Regulator through its eServices Portal, and affected data subjects are notified in writing as soon as reasonably possible, as required by section 22 of POPIA.

11. Procedure to Obtain Access to Records or Information

The fact that information and records are held by the Group as listed in this Manual does not confer on any requester a right to that information or record. PAIA grants a requester access to records of a private body if the record is required for the exercise or protection of any right. A public body that lodges a request must be acting in the public interest. Access to records and information is not automatic.

- A requester must complete Form 2 of the Regulations (Request for Access to Record), attached as Annexure A to this Manual and available from the Information Officer and the Information Regulator's website.
- The completed form may be submitted to the Information Officer by e-mail to compliance@nationalhealthcare.co.za, by post or by hand at the addresses in section 2.
- The requester must provide enough detail on the form to enable the Information Officer to identify the record and the requester.

- The requester must identify the right he or she is seeking to exercise or protect, and explain why the record is required for the exercise or protection of that right.
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the request is made, to the reasonable satisfaction of the Information Officer.
- A requester who cannot read or write, or who has a disability, may make the request orally. The Information Officer will complete the form on their behalf and give them a copy.
- The Information Officer will notify the requester of the decision within 30 days of receiving the request, in the manner the requester asked for. This period may be extended once by up to 30 days in the circumstances set out in section 57 of PAIA, with written notice and reasons.
- If the Information Officer does not decide within the required period, the request is regarded as refused.
- Where a record contains information about a third party, the Group will notify that third party and give them an opportunity to make representations before deciding the request.
- Access to records or parts of records may be refused on the grounds set out in Chapter 4 of Part 3 of PAIA, for example to protect the privacy of a third party, commercial information or confidential information.

Data subjects who want to know what personal information the Group holds about them may also use this procedure. No request fee is payable for a request for one's own personal information.

12. Fees Payable to Obtain the Requested Records or Information

Fees are prescribed in Annexure B of the Regulations and published by the Information Regulator at www.inforegulator.org.za. In summary:

- **Request fee:** R140.00, payable by every requester before the request is processed, except a requester asking for their own personal information.
- **Access fees:** prescribed fees for reproduction (for example R2.00 per A4 page for a photocopy or printed black-and-white copy), for the time reasonably required to search for and prepare the record, and for postage or electronic transfer at actual cost.
- **Deposit:** where the search and preparation is expected to take longer than the time prescribed in the Regulations, the requester may be asked to pay a deposit of one-third of the access fee.

- Fees may include VAT where applicable. The Group will notify the requester in writing of any fee payable before processing the request further.

Should access be granted, the record will be provided as soon as reasonably possible after any fees are paid. If access is refused, the Information Officer will notify the requester in writing, stating adequate reasons for the refusal (with reference to the relevant provisions of PAIA) and the remedies available. Any deposit paid will be refunded.

In terms of section 55 of PAIA, if all reasonable steps have been taken to find a requested record and the record cannot be found or does not exist, the Information Officer will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the record.

13. REMEDIES

The Group does not have an internal appeal procedure. A requester who is dissatisfied with a decision of the Information Officer, including a refusal of access, a decision on fees, an extension or a deemed refusal, may within 180 days of the decision:

- lodge a complaint with the Information Regulator on PAIA Form 5, by e-mail to PAIAComplaints@inforegulator.org.za or through the Regulator's eServices Portal; or
- apply to a court with appropriate jurisdiction for relief.

14. PROCESSING OF PERSONAL INFORMATION: OBJECTION, CORRECTION AND DELETION

Under POPIA and its Regulations, as amended on 17 April 2025, data subjects may, free of charge:

- object to the processing of their personal information, on a form substantially similar to POPIA Form 1; and
- request the correction or deletion of their personal information, or the destruction or deletion of a record, on a form substantially similar to POPIA Form 2.

These requests may be made by hand, post, e-mail, SMS, WhatsApp or telephone (telephone requests are recorded). The Group responds in writing within 30 days. Further detail is in the Group's Privacy Policy and Data Deletion Policy and Procedure, available on our website.

15. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available for inspection, free of charge, at the Group's physical address and on its website. A copy may also be requested from the Information Officer, against payment of the prescribed fee, and is available from the Information Regulator on

request. The Group will update this Manual regularly to keep it aligned with legislative developments and changes to its business.

ANNEXURE A: PRESCRIBED FORM TO BE COMPLETED BY A REQUESTER

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7 of the Regulations relating to the Promotion of Access to Information, 2021; Section 53(1) of the Promotion of Access to Information Act 2 of 2000]

A. Particulars of National Health Group (Pty) Ltd

Information Officer:	Adriaan Odendaal, Chief Executive Officer
Physical address:	PPS Centurion square, Corner Heuwel & Gordon Hood Roads, Centurion, 0046
E-mail:	compliance@nationalhealthcare.co.za
Telephone:	021 276 5600

B. Particulars of person requesting access to the record

Full names and surname: .....

Identity number: .....

Postal / physical address: .....

Telephone number: .....

E-mail address: .....

Capacity in which request is made (if made on behalf of another person; attach proof): .....

C. Particulars of person on whose behalf request is made (complete ONLY if applicable)

Full names and surname: .....

Identity number: .....

D. Particulars of record

Provide full particulars of the record, including the reference number if known. If the space is inadequate, continue on a separate page and sign every page.

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

.....

.....

2. Reference number, if available: .....

3. Any further particulars of record: .....

.....

E. Fees

- A request for access to a record, other than a record containing personal information about yourself, will be processed only after the request fee has been paid.
- You will be notified of the amount of the access fee, which depends on the form of access and the time reasonably required to search for and prepare the record.
- If you qualify for exemption from payment of any fee, please state the reason.

Reason for exemption from payment of fees:.....

F. Form of access to record

If you are prevented by a disability from reading, viewing or listening to the record in the forms below, state your disability and the form in which you require the record.

Disability: .....

Form in which record is required: .....

Mark the appropriate box with an X:

☐ Copy of record ☐ Inspection of record

☐ View images ☐ Copy of images ☐ Transcription of images

☐ Listen to soundtrack ☐ Transcription of soundtrack

☐ Printed copy ☐ Electronic copy by e-mail ☐ Electronic copy on USB / storage device

If you requested a copy or transcription, do you want it posted to you? ☐ Yes ☐ No (Postage is payable.) Preferred language: _____

G. Particulars of right to be exercised or protected

1. Indicate which right is to be exercised or protected: .....

.....

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

.....

.....

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved or denied. If you wish to be informed in another manner, please specify:

.....

Signed at ..... this ..... day of ..... 20 ....

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE: .....

FOR OFFICIAL USE

Reference number:

Request received by:

Date received:

Request fee (if any): R

Deposit (if any): R

Access fee: R

Signature of Information Officer: