

Promotion Of Access To Information Manual

For

Qalo DigiHealth Proprietary Limited

1. INTRODUCTION

1.1. This manual has been compiled in accordance with the requirements of the Promotion of Access to Information Act 2 of 2000 (PAIA) and the Protection of Personal Information Act 4 of 2013 (POPIA) in respect of Qalo DigiHealth Proprietary Limited (**Qalo DigiHealth**).

1.2. Qalo DigiHealth is a private body as defined in section 1 of PAIA, and this manual contains the information specified in section 51 of PAIA, which is applicable to such a private body. This information is as follows:

1.2.1. the contact details of the head of Qalo DigiHealth (section 51(1)(a)(i) of PAIA);

1.2.2. a description of the guide referred to in section 10 of PAIA (section 51(1)(b)(i) of PAIA);

1.2.3. a description of the records of Qalo DigiHealth which are available without a requester having to request access in terms of PAIA (section 51(1)(b)(ii));

1.2.4. a description of the records of Qalo DigiHealth which are available in terms of any legislation other than PAIA (section 51(1)(b)(iii) of PAIA); and

1.2.5. a description of the subjects on which Qalo DigiHealth holds records and the categories of records held on each subject in sufficient detail to facilitate a request for access to a record (section 51(1)(b)(iv) of PAIA).

1.3. Qalo DigiHealth is a responsible party as defined in section 1 of POPIA and this manual contains the information stipulated in section 51(1)(c) of PAIA. This information is as follows:

1.3.1. the purpose of the Processing (section 51(1)(c)(i) of PAIA);

1.3.2. a description of the categories of Data Subjects and Personal Information Processed by Qalo DigiHealth in relation to these Data Subjects (section 51(1)(c)(ii) of PAIA);

1.3.3. a description of the categories of recipients to whom that Personal Information is provided (section 51(1)(c)(iii) of PAIA);

1.3.4. actual and/or planned instances when Personal Information held by Qalo DigiHealth may be transferred outside of South Africa (section 51(1)(c)(iv) of PAIA); and

1.3.5. a description of the information security measures implemented by Qalo DigiHealth to ensure the confidentiality, integrity and availability of the Personal Information which is to be or is being Processed (section 51(1)(c)(iv) of PAIA).

1.4. The manual will be updated at least every twelve months or at such intervals as may be necessary in accordance with the requirements of section 51(2) of PAIA.

1.5. The manual facilitates requests for access to records of Qalo DigiHealth as provided for in sections 53 and 54 of PAIA and sets out how to access Personal Information held by Qalo DigiHealth in terms of sections 23 and 25 of POPIA.

2. **INTERPRETATION**

2.1. In this manual, the following words bear the meaning set out below:

2.1.1. **Qalo DigiHealth** means Qalo DigiHealth Proprietary Limited (registration number: 2016/192599/07, a company registered in South Africa in accordance with the Companies Act 71 of 2008, with its registered place of business at 123 Jan Smuts Avenue, Parkwood, Johannesburg, Gauteng, 2193;

2.1.2. **Data Subject** means the person to whom Personal Information relates, as defined in section 1 of POPIA. In the context of Qalo DigiHealth, this primarily but without limitation means clients, employees, Operators, suppliers, other persons and third parties;

2.1.3. **Deputy Information Officer** means any person designated by the Head of Qalo DigiHealth in terms of section 56 of POPIA and as registered with the Information Regulator;

2.1.4. **Employee** means any person who works for or provides services to or on behalf of Qalo DigiHealth, and receives or is entitled to receive remuneration;

2.1.5. **Guide** means the guide compiled by the South African Human Rights Commission (SAHRC), and updated and made available by the Information Regulator in terms of section 10 of PAIA;

2.1.6. **Head of Qalo DigiHealth** means the CEO of Qalo DigiHealth, or any person duly authorised by him to carry out the duties ascribed to the "head" of a private body by PAIA;

2.1.7. **Information Officer** means the Head of Qalo DigiHealth, registered with the Information Regulator in terms of section 55(2) of POPIA;

2.1.8. **Information Regulator** means the regulatory body established in terms of section 39 of POPIA;

2.1.9. **Manual** means this manual which is published in accordance with section 51 of PAIA and "this manual" shall have the same meaning;

2.1.10. **Minister** means the Cabinet member responsible for the administration of justice, presently the Minister of Justice and Correctional Services;

2.1.11. **Operator** means a person who Processes Personal Information for Qalo DigiHealth in terms of a contract or mandate, without coming under the direct authority of Qalo DigiHealth, as provided for in section 1 of POPIA, and Operators has a corresponding meaning;

2.1.12. **Personal Information** has the meaning given in section 1 of POPIA, being personal information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

2.1.12.1. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the persons;

2.1.12.2. information relating to the education or the medical, financial, criminal or employment history of the person;

2.1.12.3. any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;

2.1.12.4. biometric information of the person;

2.1.12.5. personal opinions, views, or preferences of the person;

2.1.12.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

2.1.12.7. views or opinions of another individual about the persons; and

2.1.12.8. the name of the person if it appears with other Personal Information relating to the person, or if the disclosure of the name itself would reveal information about the person;

2.1.13. Processing has the meaning given in section 1 of POPIA and includes any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:

2.1.13.1. collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;

2.1.13.2. dissemination by means of transmission, distribution or making available in any other form; or

2.1.13.3. merging, linking, as well as restriction, degradation, erasure, or destruction of information;

2.1.13.4. Process and Processed have corresponding meanings; and

2.1.14. **PAIA Regulations** means the Regulations relating to the Promotion of Access to Information, 2021;

2.1.15. **Requester** means any person or entity requesting access in terms of PAIA to a record that is under the control of Qalo DigiHealth or any Data Subject requesting details of any Personal Information relating to that Data Subject or a copy of the personal information in terms of POPIA;

3. CONTACT DETAILS

3.1. The CEO of Qalo DigiHealth is Dr Nomonde Mabuya-Moloele (**Dr Mabuya**). Dr Mabuya is the Head of Qalo DigiHealth for the purposes of PAIA.

3.2. Requests for access to records or Personal Information in terms of either PAIA or POPIA should be addressed to the Information Officer and/or Deputy Information Officer using the following contact details:

Physical address:

123 Jan Smuts Avenue
Parkwood
Johannesburg
Gauteng
2193

Postal address:

PO Box 1621
Fourways
Fourways
2055

Telephone:

+27(11) 447 6010

Email: io@enormegroup.com

4. **SECTION 10 GUIDE ON HOW TO USE PAIA (SECTION 51(1)(B)(I) OF PAIA)**

4.1. The Information Regulator must, in terms of section 10 of PAIA, update and make available the Guide compiled by the SAHRC to assist persons wishing to exercise any rights in terms of PAIA.

4.2. A request for the Guide can made to the Information Regulator in the prescribed form (Form 1 of Annexure A). A copy of the form is attached as Annexure B to this manual. Any person wishing to obtain the Guide may either access it through the website of the Information Regulator here or should contact:

The Information Regulator

Physical Address:

JD House
27 Stiemens Street
Braamfontein,
Johannesburg, 2001.
2017
Telephone: 010 023 5200
Email: enquiries@inforegulator.org.za

4.3. Alternatively, members of the public can inspect or make copies of the Guide from the offices of the Information Regulator, at no fee, during normal working hours (regulation 2(3) of the PAIA Regulations).

4.4. The Information Officer must have a copy of the Guide available in at least two of the official languages in South Africa at its address available for inspection, at no fee, during normal working hours (regulation 3(3) of the PAIA Regulations).

4.5. The Information Officer must make available the Guide, upon request in the prescribed form (Form 1 of Annexure A), the number of copies of the Guide requested (regulation 3(2) of the PAIA Regulations). A copy of the form is attached as Annexure B to this manual.

5. **RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION (SECTION 51(1)(B)(III) OF PAIA)**

5.1. Certain records held by Qalo DigiHealth are available in terms of legislation other than PAIA. The specific records which are available in terms of such legislation are set out therein and these records may in certain instances only be accessed by the persons specified in the relevant legislation. The legislation is as follows:

5.1.1. Basic Conditions of Employment Act 75 of 1997
5.1.2. Companies Act 71 of 2008
5.1.3. Compensation for Occupational Injuries and Diseases Act 130 of 1993
5.1.4. Employment Equity Act 55 of 1998
5.1.5. Hazardous Substances Act 15 of 1973
5.1.6. Income Tax Act 58 of 1962
5.1.7. Labour Relations Act 66 of 1995
5.1.8. Occupational Health and Safety Act 85 of 1993
5.1.9. Pension Funds Act 24 of 1956
5.1.10. Skills Development Act 97 of 1998
5.1.11. Unemployment Insurance Act 63 of 2001
5.1.12. Unemployment Insurance Contributions Act 4 of 2002
5.1.13. Value Added Tax Act 89 of 1991

6. DESCRIPTION OF THE SUBJECTS ON WHICH QALO DIGIHEALTH HOLDS RECORDS AND THE CATEGORIES OF RECORDS HELD ON EACH SUBJECT (SECTION 51(1)(B)(IV) OF PAIA)

6.1. The following is a list of the subjects on which Qalo DigiHealth holds records and the broad categories into which these records fall. The procedure in terms of which such records may be requested from Qalo DigiHealth is set out in Section 7 of this manual. The records listed below will not in all instances be provided to a requester who requests them in terms of PAIA. The requester must show that he or she has the right in terms of PAIA to be given access to the records in question.

6.1.1. Company Secretarial:
6.1.1.1. Memorandum of incorporation of Qalo DigiHealth;
6.1.1.2. share register;
6.1.1.3. minutes and resolutions;
6.1.1.4. directors' records;
6.1.1.5. minutes of board meetings; and

6.1.1.6. records relating to the incorporation of Qalo DigiHealth.

6.1.2. Finance:
6.1.2.1. accounting records;
6.1.2.2. tax records;
6.1.2.3. VAT records;
6.1.2.4. Insurance records;
6.1.2.5. auditors' reports;
6.1.2.6. interim and annual financial statements; and
6.1.2.7. invoices issued in respect of debtors and billing information.

6.1.3. Human Resources:
6.1.3.1. staff records;
6.1.3.2. employment contracts;
6.1.3.3. Curriculum vitaes of employees, including qualifications;
6.1.3.4. Payroll records;
6.1.3.5. Health and safety records;
6.1.3.6. Workplace skills plans;
6.1.3.7. Codes of conduct; and
6.1.3.8. Internal codes, policies and procedures.

6.1.4. Property:
6.1.4.1. Asset registers;
6.1.4.2. Lease agreements in respect of immovable property;
6.1.4.3. Records regarding insurance in respect of movable property; and
6.1.4.4. Records regarding insurance in respect of immovable property.

6.1.5. Legal:
6.1.5.1. Various contracts and agreements; and
6.1.5.2. Letters of engagement.

6.1.6. Public Relations:
6.1.6.1. Qalo DigiHealth brouchers', marketing materials, and publications; and
6.1.6.2. Media releases.

7. PROCESSING OF PERSONAL INFORMATION BY QALO DIGIHEALTH (SECTION 51(1)(C) OF PAIA)

7.1. Information automatically available

7.1.1. Certain records are available without needing to be requested in terms of the request procedures set out in PAIA and detailed in this Section 7 of this manual. This information may be inspected, collected, purchased, or copied (at the prescribed fee for reproduction) at the offices of Qalo DigiHealth. Certain information is also available on Qalo DigiHealth website located at https://qalodigihealth.co.za/

7.1.2. The records include:
7.1.2.1. Marketing brochures
7.1.2.2. Contact information
7.1.2.3. Corporate Responsibility
7.1.2.4. Services Provided
7.1.2.5. Career information
7.1.2.6. Media releases

8. REQUEST PROCEDURE IN TERMS OF PAIA (SECTION 53 OF PAIA)

8.1. A request for access to records held by Qalo DigiHealth in terms of section 50 of PAIA must be made in the prescribed form (Form 2 of Annexure A) the PAIA Regulations (section 53(1) of PAIA). A copy of the form is attached as Annexure C to this manual. The request must be made to Qalo DigiHealth at the address, or email address, specified in Section 2 above.

8.2. A requester must provide sufficient detail on the prescribed form to allow Qalo DigiHealth to identify the record or records which have been requested and the identity of the requester (section 53(2) of PAIA). If a request is made on behalf of another person or entity, the requester must submit details and proof of the capacity in which the requester is making the request, which must be reasonably satisfactory to Qalo DigiHealth (section 53(2)(f) of PAIA).

8.3. The requester is also required to indicate the form of access to the relevant records that is required, and to provide his, her or its contact details in the Republic of South Africa (sections 53(2)(b) and (c) of PAIA).

8.4. The requester must identify the right that he, she, or it is seeking to exercise by accessing records held by Qalo DigiHealth and must explain why the particular record or records requested is or are required for the exercise or protection of that right (section 53(2)(d) of PAIA).

8.5. Qalo DigiHealth may, and must in certain instances, refuse access to records on any of the grounds set out in Chapter 4 of Part 3 of PAIA which include:

8.5.1. that access would result in the unreasonable disclosure of Personal Information about a third party,
8.5.2. to protect the commercial information of a third party or of Qalo DigiHealth itself, that it is necessary to protect the confidential information of a third party,
8.5.3. to protect the safety of individuals or property,
8.5.4. that a record constitutes privileged information for the purpose of legal proceedings
8.5.5. to protect the research information of a third party or Qalo DigiHealth itself.

8.6. Access to documents may also be refused on the basis of professional privilege.

8.7. Qalo DigiHealth is required to inform a requester in writing of its decision in relation to a request (section 56 of PAIA). If the requester wishes to be informed of Qalo DigiHealth decision in another manner as well, this must be set out in the request and the relevant details included, to allow Qalo DigiHealth to inform the requester in the preferred manner.

8.8. Qalo DigiHealth will make a decision in relation to a request for records within 30 days of receiving it, unless third parties are required to be notified of the request or the 30-day period is extended as provided for in PAIA. Qalo DigiHealth will notify the requester if the 30-day period for processing a request is to be extended.

8.9. Where a request is refused, a requester may apply to the High Court within 30 days of being informed of the refusal of the request, for an order compelling the record or records requested to be made available to the requester or for another appropriate order. The High Court will determine whether the records should be made available or not.

9. **FEES PAYABLE (SECTION 54 OF PAIA READ WITH REGULATION 8 AND ANNEXURE B OF THE PAIA REGULATIONS)**

9.1. A requester has to pay a request fee of R140.00. This request fee may be paid at the time a request is made, or the person authorised to deal with such requests on Qalo DigiHealth behalf may notify the requester that he, she or it needs to pay the request fee before processing the request any further. A requester may apply to Court to be exempted from the requirement to pay the request fee.

9.2. Where a request for access to a record or records held by Qalo DigiHealth is granted, the requester also has to pay an access fee for the reproduction of the record or records, and for the search for and the preparation of the records for disclosure. Qalo DigiHealth is entitled to withhold a record until the required access fees have been paid. The access fees which are payable are as follows:

Item	Description	Amount
1.	Request fee payable by every requester	R140.00
2.	Photocopy or printed black & white copy of an A4-size page	R2.00 per page or part of the page
3.	Printed copy of an A4-size page	R2.00 per page or part of the page
4.	For a copy in a computer-readable form on: • Flash drive (to be provided by requestor) • A compact disc (CD) if the requester provides the CD to us • A compact disc (CD) if we give the CD to the requester	 R40.00 R40.00 R60.00
5.	For a transcription of visual images, per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
6.	For a copy of visual images	Service to be outsourced. Will depend on quotation from service provider.
7.	For a transcription of an audio record, A4-size page	R24.00

8.	For a copy of an audio record on: • Flash drive (provided by the requester) • For a copy of an audio record on compact disc (CD) if the requester provides the CD to us • For a copy of an audio record on compact disc (CD) if we give the CD to the requester	 R40.00 R40.00 R60.00
9.	For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure. The search and preparation fee cannot exceed	R145.00 R435.00
10.	Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 2 to 8 above.
11.	Postage, email or any other electronic transfer	Actual expense, if any.

9.3. If Qalo DigiHealth is of the opinion that the search for and the preparation of the records requested will require more than six hours, Qalo DigiHealth is entitled to ask for a deposit of one third of the access fees which will be payable in respect of the records requested by the requester. The requester may make an application to the Court or lodge a complaint with the Information Regulator to be exempted from the requirement to pay this deposit. If a deposit is made and access to the records requested is subsequently refused, the deposit will be repaid to the requester.

10. REQUEST PROCEDURE IN TERMS OF POPIA (SECTIONS 23 AND 25 OF POPIA)

10.1. A request for access in terms of section 23 of POPIA must be made in manner and form set out in section 8 of this manual above (section 25 of POPIA).

10.2. No fee is payable where a requester asks Qalo DigiHealth to confirm whether or not Qalo DigiHealth holds his, her, or its Personal Information (section 23(1)(a) of POPIA).

10.3. A prescribed fee, if any, as set by the Minister after consultation with the Information Regulator may be payable if a requester asks for a copy of the Personal Information held by Qalo DigiHealth, or a description of the records held by Qalo DigiHealth that contain the requester's Personal Information (section 23(1)(b)(ii) read with section 111(1)(a) of POPIA). Qalo DigiHealth must give the requester a written estimate of the fee beforehand and may require the requester to pay a deposit for all or part of the estimated fee (section 23(3) of POPIA).

11. INFORMATION OR RECORDS NOT FOUND (SECTION 55 OF PAIA)

11.1. If all reasonable steps have been taken to find a record that is requested under PAIA, and the requested record cannot be found or does not exist, then Qalo DigiHealth will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

11.2. The affidavit or affirmation will 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 Qalo DigiHealth with every person who conducted the search.

11.3. If the record in question should later be found, the requester will be given access to the record in the manner stipulated by the requester unless access is refused by Qalo DigiHealth as permitted by PAIA (as dealt with in Section 8 above).

12. INFORMATION REQUESTED ABOUT A THIRD PARTY (CHAPTER 5 OF PART 3 OF PAIA)

Where any information that relates to a third party is requested in terms of PAIA from Qalo DigiHealth, Qalo DigiHealth is required to notify the third party of the request (section 71 of PAIA). The third party has an opportunity to grant their consent to the disclosure of the record or to make representations as to why the

requested record should not be disclosed to the requester (section 72 of PAIA). If Qalo DigiHealth decides to grant access to the record, it will notify the affected third party again (section 73 of PAIA). The third party is entitled to apply to court in relation to that decision. The court will then determine whether the record should be disclosed by Qalo DigiHealth or not.

13. OTHER PRESCRIBED INFORMATION (SECTION 51(1)(A)(II) OF PAIA)

The Minister has not prescribed that any further information must be contained in this manual.

ANNEXURE A

PROCESSING OF PERSONAL INFORMATION

Qalo DigiHealth takes the privacy and protection of Personal Information seriously and will only Process Personal Information in accordance with POPIA or any other applicable legislation which deals with privacy rights. Accordingly, the relevant Personal Information privacy conditions and requirements relating to the Processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion of Personal Information) will be applied to any Personal Information Processed by Qalo DigiHealth.

1. **Purpose of Processing Personal Information**

1.1. Qalo DigiHealth uses the Personal Information under its care in the following ways:

1.1.1. Staff administration
1.1.2. Keeping of accounts and records
1.1.3. Complying with tax laws
1.1.4. Furtherance of business activities
1.1.5. To participate in procurement processes
1.1.6. For client registration processes

2. **Categories of Data Subjects and their Personal Information that Qalo DigiHealth Processes:**

2.1. Juristic persons/entities

2.1.1. Names of contact persons
2.1.2. Name of legal entity
2.1.3. Physical and postal address and contact details
2.1.4. Financial information
2.1.5. Registration number
2.1.6. Founding documents
2.1.7. Tax related information
2.1.8. Authorized signatories
2.1.9. Beneficiaries
2.1.10. Ultimate beneficial owners

2.2. Clients
2.2.1. Names
2.2.2. ID number
2.2.3. Date of birth
2.2.4. Nationality
2.2.5. Gender
2.2.6. Contact details
2.2.7. Physical and postal addresses
2.2.8. Tax related information
2.2.9. Confidential correspondence

2.3. Clients– Foreign persons
2.3.1. Names
2.3.2. Contact details
2.3.3. Physical and postal address
2.3.4. Date of birth
2.3.5. Passport number
2.3.6. Tax related information
2.3.7. Nationality
2.3.8. Gender
2.3.9. Confidential correspondence

2.4. Intermediary/Advisor
2.4.1. Names of contact persons
2.4.2. Name of legal entity
2.4.3. Physical and postal address and contact details
2.4.4. Financial information
2.4.5. Registration number
2.4.6. Founding documents
2.4.7. Tax related information
2.4.8. Authorized signatories
2.4.9. Beneficiaries
2.4.10. Ultimate beneficial owners

2.5. Contractors
2.5.1. Names of contact persons
2.5.2. Name of legal entity
2.5.3. Physical and postal address and contact details
2.5.4. Financial information
2.5.5. Registration number
2.5.6. Founding documents
2.5.7. Tax related information
2.5.8. Authorized signatories
2.5.9. Beneficiaries
2.5.10. Ultimate beneficial owners

2.6. Employees/Directors
2.6.1. Gender
2.6.2. Pregnancy
2.6.3. Marital status
2.6.4. Race
2.6.5. Age
2.6.6. Language
2.6.7. Education information
2.6.8. Financial information
2.6.9. Employment history
2.6.10. ID number
2.6.11. Physical and postal address
2.6.12. Contact details
2.6.13. Opinions
2.6.14. Criminal behavior
2.6.15. Well-being

3. **Categories of recipients to whom Personal Information may be supplied**

3.1. Qalo DigiHealth may supply Personal Information to the following recipients:
3.1.1. Management and employees;
3.1.2. Contractors, service providers or business partners;
3.1.3. Operators;
3.1.4. Stakeholders and shareholders.;
3.1.5. Law enforcement agencies and Regulators

3.2. Qalo DigiHealth will conclude appropriate agreements with any service providers that Process Personal Information on its behalf to require service providers to protect Personal Information in line with the requirements of POPIA.

3.3. Qalo DigiHealth does not share the Personal Information of its Data Subjects with any third parties, except if:

3.3.1. It or the third party has a legitimate interest in the Personal Information being shared, and an appropriate balance has been struck between that interest and protecting Data Subjects rights;

3.3.2. It is necessary to conclude or implement a contract with a Data Subject;

3.3.3. It is obliged to provide such information for legal or regulatory purposes;

3.3.4. It is required to do so for purposes of existing or future legal proceedings; and

3.3.5. It is involved in the prevention of fraud, loss, bribery, or corruption; the third party performs services and Processes Personal Information on Qalo DigiHealths' behalf as its Operator.

3.4. The third party performs services and Processes Personal Information on Qalo DigiHealths' behalf as its Operator.

3.5. Qalo DigiHealth will send its Data Subjects appropriate notifications or communications of its Processing if it is obliged to do so by law, or in terms of its contractual relationship with Data Subjects.

4. **Actual or planned transfers of Personal Information outside of South Africa**

4.1. Qalo DigiHealth may transfer Personal Information under its control to organisations in other countries in order to:

4.1.1. provide information to prospective clients, business partners, or

4.1.2. store data with third party cloud storage providers.

4.2. Qalo DigiHealth will take steps to ensure that Operators in foreign countries are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection of Personal Information and uphold the principles for reasonable and lawful processing of Personal Information, in terms of POPIA.

4.3. [Where electronic data is stored in the cloud, Personal Information may be stored outside South Africa. Qalo DigiHealth has appropriate contracts in place with service providers to ensure that Personal Information is appropriately secured.]

4.4. General description of information security measures implemented by Qalo DigiHealth.

4.5. Qalo DigiHealth employs up to date technology to ensure the confidentiality, integrity, and availability of the Personal Information under its care. Such measures include:

4.5.1. Firewalls
4.5.2. Secure web gateways
4.5.3. Regular vulnerability scans of IT networks and systems
4.5.4. Cybersecurity awareness training for all employees
4.5.5. Virus protection software and update protocols
4.5.6. Logical and physical access control
4.5.7. Secure setup of hardware and software making up the IT infrastructure
4.5.8. Requiring Operators who Process Personal Information on behalf of Qalo DigiHealth to implement security controls in terms of Qalo DigiHealths' contract with them.

ANNEXURE B

FORM 1: POPIA DATA CONFIRMATION REQUEST

Under section 23 of the Protection of Personal Information Act (4 of 2013) (**POPIA**), you have a right to (i) request Qalo DigiHealth to confirm whether or not it holds personal information about you (at no charge); and (ii) request a copy (with a possible prescribed fee) of the record or a description of the Personal Information Qalo DigiHealth holds about you, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information. Qalo DigiHealth could hold Personal Information in a number of different areas. Completing this form will help us to locate the information you are seeking and deal with your request as quickly as possible.

1. Part 1 – About Yourself

SURNAME:	
FIRST NAME (S):	
ALTERNATIVE NAMES:	
IDENTITY NUMBER:	
DATE OF BIRTH:	
CURRENT ADDRESS:	
PHONE NUMBER:	
EMAIL ADDRESS:	

2. Part 2 – Are You Requesting Information About Yourself?

IF YES:	Please go to Part 4
IF NO:	If you are making the request on behalf of another person you must enclose with the request a signed authority from them to do so. If you are making the application because the data subject lacks capacity to make the application in their own right, please outline your authority to make the application in their stead (for example, Power of Attorney). You should enclose a copy of any evidence that you may have of that authority. The Information Officer of Seriti will contact you if further evidence is required. (please complete Part 3).

3. Part 3 – Details of the Data Subject (If requesting information on behalf of someone else)

If requesting information about an individual:	
SURNAME:	
FIRST NAME (S):	
ALTERNATIVE NAMES:	
IDENTITY NUMBER:	
DATE OF BIRTH:	
CURRENT ADDRESS:	
PHONE NUMBER:	
EMAIL ADDRESS:	
RELATIONSHIP TO DATA SUBJECT:	

If requesting information about a juristic person:	
NAME OF ENTITY:	
ALTERNATIVE NAMES:	
REGISTRATION NUMBER:	
REGISTERED ADDRESS:	
PRINCIPAL PLACE OF BUSINESS:	

4. Part 4 – Locating Your Personal Information

In order for us to be able to locate the information you are seeking, please provide some details, if known, as to where you feel information is held about you. If you would like to provide any further information that you feel would be helpful in locating your personal information, please provide this in the box named Additional Information.

DESCRIBE THE INFORMATION YOU ARE REQUESTING:	If you are only seeking certain records, it would be helpful for us to know which types of record you are seeking, any time period to cover, and if you would like to see only specific document(s). Please describe these below with as much detail as you can.
DATES OF CONTACT: (approximately)	
ADDITIONAL INFORMATION:	

5. Part 5 – Confirming Your Identity

We may ask for identification to confirm who you are.

It would therefore be helpful if, at the outset, you could provide, for identification purposes, a copy of any one of the documents listed below. Your document will be returned once the search for your personal data is completed.

- Certified copy of current identity document
- Certified copy of current passport

6. Part 6 – Declaration

Please read the following declaration carefully and sign and date it. I,_____, certify that the information provided on this application to Qalo DigiHealth's is true and correct. I understand that it is necessary for Qalo DigiHealth to confirm the data subject's identity, and that it may be necessary for Qalo DigiHealth to request more details from me to be able to locate the correct information.

Signature: _____ **Date:** _____

Please return the completed form and supporting documents to the Information Officer by email at io@enormegroup.com

ANNEXURE C

REQUEST FOR A COPY OF THE GUIDE

[Regulations 2 and 3 of the PAIA Regulations]

TO

The Information Regulator
P.O. Box 31533
Braamfontein
Johannesburg
2017
Telephone:
010 023 5200
enquiries@inforegulator.org.za

OR

The Information Officer

Dr Nomonde Mabuya-Moloele

123 Jan Smuts Avenue
Parkwood
Johannesburg
Gauteng
2193

Telephone:
+27(0)11 447 6010
Email: io@enormegroup.com
Access form: REQUEST FOR A COPY OF THE GUIDE

ANNEXURE D

FORM 2
REQUEST FOR ACCESS TO RECORD

[Regulation 7 of the PAIA Regulations]

Note:
1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation must be attached to this form.

TO

The Information Officer
Dr Nomonde Mabuya-Moloele

123 Jan Smuts Avenue
Parkwood
Johannesburg
Gauteng
2193

Telephone:
+27(0)11 447 6010
Email: io@enormegroup.com
Access form: REQUEST FOR ACCESS TO RECORD