

**PAIA AND POPIA MANUAL IN TERMS OF THE
PROVISIONS OF THE PROMOTION OF ACCESS TO
INFORMATION ACT NO. 2 OF 2000 (“PAIA”) and the
PROTECTION OF PERSONAL INFORMATION ACT 4 of
2013 (“POPIA”)**

for

REACH DIGITAL HEALTH NPC

[Registration Number: 2007/012585/08]

(“Reach” or “the Company”)

1. DEFINITIONS

- a) **“PAIA”** means the Promotion of Access to Information Act, 2000.
- b) **“POPIA”** refers to the Protection of Personal Information Act of 2013.
- c) **“Manual”** includes this PAIA and POPIA manual and any other annexure or schedules attached.
- d) **“Constitution”** means the Constitution of the Republic of South Africa 108 of 1996.
- e) **“Reach Digital Health”** or **“the Company”** refers to the non-profit company Reach Digital Health NPC with company registration number 2007/012585/08 and address at 50 Smits Road, Dunkeld, 2196, Johannesburg, South Africa.
- f) **“Personal Information”** or **“PI”** essentially means any information that defines a person and includes but is not limited to a person’s name, gender, location, age, relationship status, health, sexual orientation, religion, belief, nationality, etc).
- g) **“Private Body”** refers to any organisation, company, institution or business other than government.
- h) **“Public Body”** refers to any department of state or administration in the national or provincial government or any municipality in the local sphere of government.
- i) **“Responsible Party”** refers to any public or private body or any other person, which alone or together with others, determines the purpose of and means to process personal information.
- j) **“Data Subject”** refers to the person to whom the PI relates (but can also include a company or organisation).
- k) **“Processed”** or **“Process”** refers to any activity where Personal Information is handled (and includes but is not limited to collecting, recording, organising, structuring, storing, modifying, using, publishing, combining, destroying and/or erasing PI).
- l) **“Requestor”** is anyone requesting access to a record held by Reach, and in this regard, PAIA distinguishes between two types of requesters:
 - **“Personal Requestor”** is someone who is seeking access to a record containing personal information about themselves and
 - **“Other Requestor”** is someone (company or person) requesting access to information about third parties.

2. INTRODUCTION

- 2.1. Three Acts are established to support human rights legislation about access to and protecting information mandated by the Constitution of the Republic of South Africa.
 - 2.1.1. The Promotion of Access to Information Act 2 of 2000 (PAIA),
 - 2.1.2. The Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 (PEPUDA); and
 - 2.1.3. The Protection of Personal Information Act 4 of 2013
- 2.2. These Acts affect the constitutional rights to access information, administrative justice, and equality. To expand on these rights, Section 2 of the Constitution gives everyone the right to access any information held by the state or another person,

which is required to exercise or protect these rights.

- 2.3. To give effect to these rights, this Manual prescribes the processes needed to access or process information while specifying the types and categories of records held by this Company. It does so within POPIA, PEPUDA and PAIA (“the Applicable Acts”).
3. POPIA commenced to effect the constitutional right to privacy by safeguarding personal information when processed by a responsible party and regulating how such personal information is processed and to whom.
4. PAIA, on the other hand, details the procedure to be followed by a request for access to information and how such a request will be facilitated. In contrast, POPI describes the purpose for which personal information may be processed, a description of the relevant Data Subjects for whom Reach processes personal information, and the categories of personal information it relates to and to whom personal information may be supplied.
5. PEPUDA ensures fair, transparent and accessible processes for all, eliminating unfair discrimination.

(“the Applicable Acts”)

6. The Purpose of this Manual is to provide a toolkit for requestors to follow when requesting information and/or records within the context of the Applicable Acts. Reach’s Access to Information Manual (Reach’s Manual) references the legislative requirements, types of records held and the prescribed processes to request such records. It also details the purpose for which Personal Information may be processed, to whom and how to follow the provisions of POPI in doing so.
7. Reach has a Privacy Policy in line with POPIA, which can be accessed on our website. This Manual and Reach’s Privacy Policy ([Privacy — Reach](#)) must be read together.
8. **Legal Status and Application**
 - 8.1. Should any provision of this Manual contradict any provision in the Applicable Acts or any other legislation, the provisions of the Acts or other legislation apply.
 - 8.2. Nothing in this Manual prevents Reach from providing access to Personal Information or Records in the possession of Reach in a manner which is materially less demanding in terms of any legislation other than provided for in this Manual or the Applicable Acts.
 - 8.3. The Applicable Acts and this Manual do not apply to Personal Information requested for criminal or civil proceedings.
 - 8.4. The Applicable Acts and this Manual apply to the exclusion of any provision or other legislation that prohibits or restricts the disclosure of a Record of Reach materially inconsistent with the object or a provision of the Act or this Manual.
 - 8.5. No provision in this Manual creates a right, interest or legitimate expectation to be

provided with any Record or Personal Information. Each access request will be considered on merit and not be refused without good reason.

- 8.6. By publishing this Manual and making it available as contemplated below, it is placed in the public domain and becomes a public document.
- 8.7. The Electronic Communications and Transactions Act of 2002 applies to all forms, records, documents, or electronically communicated information.

9. **DETAILS OF THE COMPANY**

- 9.1. **Nature of the business:** The business of the Company is to solve some of the world’s most complicated social problems by using mobile technology and building large-scale technology platforms to provide people with information and services to improve their health and well-being.
- 9.2. **Appointment of Directors:** Reach is a not-for-profit company without members or shareholders. Therefore, any vacancy in the minimum of Directors through death, resignation, disqualification or for any other reason shall immediately be filled by an appointment made by a 75% majority vote of the Board of Directors provided, however, that until such appointment be made, the remaining Directors shall be entitled to function on their own.
- 9.3. **Constitution of the Company:** Reach’s MOI (Memorandum of Incorporation) is available from the [CIPC eServices](#). Any director can obtain a copy for free, but anyone else will have to register as a CIPC customer and pay a fee of R30 to get a copy of this document. It utilises a specially drafted MOI unique to the Company and has not adopted any additional rules for the MOI.
- 9.4. **Group Structures and connected companies:** The Company is not part of any holding/subsidiary structure. The company has associated companies via cross-directorship.
- 9.5. **The details for our Information Officer are as follows:**

Chief Executive Officer and Information Officer	Deborah Rogers
Non-Profit Company Registration number	2007/012585/08

Company Registered Address	50 Smits Road Dunkeld 2196 Johannesburg
Postal Address	Postnet Suite 230 Private Bag X11 Craighall 2024
Email	popia@reachdigitalhealth.org
Website	https://www.reachdigitalhealth.org/

10. **Contact Details for PAIA and POPIA requests**

All requests made regarding the PAIA and the POPIA relating to the Company should be directed to the Deputy Information Officer who has been appointed to deal with these requests:-

Deputy Information Officer	Taryn Hinton
Registered Address	50 Smits Road Dunkeld 2196 Johannesburg
Postal Address	Postnet Suite 230 Private Bag X11 Craighall 2024
Email	popia@reachdigitalhealth.org

11. How to use this MANUAL to access information or records from Reach Digital Health (a private body)

11.1. Before requesting to access general information from a private (or public) body, please visit the Information Regulator’s General PAIA Guide, which sets out a Requestor’s relevant PAIA and POPIA rights. The guide is updated occasionally and is available online at <https://inforegulator.org.za/paia-guidelines/>. This Guide and any amendments to it form part of this Manual. Information on this website may assist you in compiling the necessary forms or understanding the general process.

11.2. To request information or a copy of a record, document or form held by Reach, please follow the steps below.

11.2.1. Complete Form C of the PAIA, [Paia_form_C.doc](#), setting out the details of the request, along with the reasons for it;

11.2.2. Sign the form and submit it to Reach at popia@reachdigitalhealth.org.

11.3. Anyone requiring a copy of the PAIA Guide or any part thereof may contact the Deputy Information Officer using Form 1 of Annexure A to the PAIA Regulations. Prescribed fees provided by the PAIA Regulation will be charged for reproduction and postage.

11.4. Any further queries regarding the PAIA Guide may be directed as follows:

	The Information Regulator (South Africa)
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P.O Box 31533, Braamfontein, Johannesburg, 2017
Email	PAIACompliance@inforegulator.org.za or enquiries@inforegulator.org.za
Website	https://inforegulator.org.za/

12. RECORDS HELD under SECTION 51(1)(d) OF THE ACT

12.1. In its day-to-day business, the Company is required by law and, as a matter of standard practice and good governance, to keep records. The subjects and categories

of records are set out below in the Schedule attached below.

12.2. Apart from POPIA and PAIA, the following legislation also applies to the Company concerning the protection of Personal Information and Records:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Business Act 71 of 1991
- Companies Act 71 of 2008
- Consumer Protection Act 68 of 2008
- Compensation of Occupational Injuries and Diseases Act No. 130 of 1993
- Competition Act. No. 71 of 2008
- Constitution of the Republic of South Africa 2008
- Copyright Act No. 98 of 1978
- Customs and Excise Act No. 91 of 1964
- Currencies and Exchanges Act 9 of 1993
- Cybercrimes Act No. 19 of 2020; 10.1.13 4 of 1998
- Designs Act No. 195 of 1993
- Electronic Communications Act No. 36 of 2005; 10.1.16
- Electronic Communications and Transaction Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Institutions (Protection of Funds) Act 28 of 2001
- Financial Intelligence Centre Act 38 of 2001, as amended in 2008
- Financial Services Ombud Schemes Act 37 of 2004
- Identification Act 68 of 1997
- Income Tax Act 58 of 1962
- Insider Trading Act 135 of 1998
- Insolvency Act 24 of 1936
- Intellectual Property Laws Amendment Act 38 of 1997
- Labor Relations Act 66 of 1995
- Leases of Land Act 18 of 1969
- Long Term Insurance Act 52 of 1998
- Machinery and Occupational Safety Act 6 of 1983
- National Credit Act 34 of 2005
- National Road Traffic Act 93 of 1996
- National Environmental Management Act 107 of 1998
- Occupational Health and Safety Act 85 of 1993
- Patents Act 57 of 1978
- Pension Funds Act 24 of 1956
- Prescription Act No. 68 of 1969
- Prevention of Organised Crime Act No. 121 of 1998
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Protected Disclosures Act 26 of 2000

- Revenue laws Second Amendment Act. 61 of 2008
- Road Transportation Act 74 of 1977
- Skills Development Levies Act 9 of 1999
- Stock Exchanges Control Act 1 of 1985
- Taxation Laws Amendment Act 7 of 2010
- Trademarks Act 194 of 1993
- Transfer Duty Act 40 of 1949
- Uncertificated Securities Tax Act No. 31 of 1998
- Unemployment Contributions Act 63 of 2001
- Unemployment Insurance Act 30 of 1966;
- Value-Added Tax Act 89 of 1991

13. SUBJECTS AND CATEGORIES OF RECORDS

- 13.1. The subjects and categories below are records held as a matter of standard practice and are not exhaustive. They are intended to serve as a guide only to the records held by Reach.
- 13.2. The records of the subjects and categories below do not indicate that all the information is available for public consumption, nor does it imply that a request will automatically be granted. Information is automatically available without request in the prescribed form, which is itemised below.
- 13.3. All access requests will be evaluated on a case-by-case basis on their own merits, and due consideration will be made. Reach also reserves the right to decline to grant access by the law, including -
- 13.3.1. Certificate of Incorporation/Memorandum of Incorporation
 - 13.3.2. Companies Act records
 - 13.3.3. Financial records, including audited annual financial statements
 - 13.3.4. Tax records
 - 13.3.5. Asset and liability records
 - 13.3.6. Employment records and policies (in compliance with The Basic Conditions of Employment Act and Labour Relations Act, including, among other things, each employee's name, occupation, remuneration and benefits received, performance-related matters, and additional personal information)
 - 13.3.7. Employment equity plan
 - 13.3.8. Procurement records
 - 13.3.9. Other party records
 - 13.3.10. Contracts and agreements
 - 13.3.11. Minute books (Resolutions passed at meetings of the Board and Committees of the company)
 - 13.3.12. Books of account required by legislation and supporting schedules
 - 13.3.13. Policies and Procedures, Research papers, Publications, Marketing documents, User Manuals
 - 13.3.14. Confidential, internal and external Correspondence.

14. RECORDS AUTOMATICALLY AVAILABLE

Records which are automatically available without having to request in the prescribed form include the following:

- 14.1. Records that Reach is compelled in terms of legislation to reveal to statutory officials so that they can perform their duties;
- 14.2. Reach brochures, articles, newsletters, and publications
- 14.3. All information contained on the Reach Website

15. REQUESTS FOR ACCESS TO INFORMATION

15.1. Access request procedure

- 15.1.1. The PAIA gives third parties the right to approach private bodies (such as Reach) to request information held by them, which is required in the exercise and/or protection of any right.
- 15.1.2. On request, Reach is obliged to release the information unless the PAIA expressly states that the information may not be released. Any application for access to a record is subject to certain limitations if the requested record protects certain rights and falls within a specific category specified in Part 3 and Chapter 4 of the PAIA. This manual explains to Requestors how to obtain such information from Reach (by setting out the prescribed criteria).
- 15.1.3. It is important to note that the successful completion and submission of an access request form does not automatically allow or guarantee the requester access to the requested records.
- 15.1.4. Records held by Reach may be accessed only once the requirements have been met. This means that a requestor must comply with all the requirements (contained in section 53 of PAIA) relating to a Request for Access to a Record.
A

15.2. Completion of access request form

- 15.2.1. To facilitate a timely response to requests for access, requesters should submit the fully completed **Access Request Form** in the Regulations to the Act (Form 2 of Regulation 7, [PAIA Forms - Information Regulator](#)) and ensure that the following requirements are met:
 - 15.2.1.1. Proof of identity is required to authenticate the identity of the Requester.
 - 15.2.1.2. If there is insufficient space on a printed form, additional information may be provided as attachments.
 - 15.2.1.3. The form must provide sufficient particulars to enable the information

officer to identify:

- 15.2.1.3.1. the record/s requested and the form of access required; and
- 15.2.1.3.2. full details of the Requester, including their capacity, if it is being made on behalf of another as well as contact details and address;
- 15.2.1.3.3. the right the Requester is seeking to exercise or protect and an explanation of why the requested record is required for the exercise or protection of that right;
- 15.2.1.4. Should the Requester be illiterate or have a disability that prevents him/her from completing the form, or the form has to be completed orally, the information officer will complete Form 2 of Annexure A to the Regulations on behalf of the requester and provide a copy thereof to the requester.

16. PRESCRIBED FEES

- 16.1. PAJA provides two types of fees:
 - A Request Fee (a standard fee applicable when Reach's Information Officer requests someone to access information. This does not refer to a personal requestor) and
 - Access Fees are calculated by considering preparation time, postage, required format and reproduction costs. This requestor would be required to pay these costs, including a deposit as set out below, before the request can be granted).
- 16.2. The Information Officer to whom a request is made must, by notice, require the Requester to pay the prescribed fee (if any) as detailed above before further processing the Request. The prescribed fees are available upon request to the Information Officer and will be determined as set out above.
- 16.3. If the search for a Record of Reach in respect of which a Request for access by a Requester other than a Personal Requester has been made, and the preparation of the Record for disclosure, in the opinion of the Information Officer concerned, would require more than the hours prescribed for this purpose. In that case, the Information Officer shall, by notice, need the Requester, other than a Personal Requester, to pay a deposit that shall not be more than one-third of the access fee that would be payable if the Request is granted.
- 16.4. The notice in paragraph 16.2 above must state-
 - 16.4.1. the amount of the deposit payable;
 - 16.4.2. that the Requester may lodge an application with a Court against the tender or payment of the Access fee in paragraph 16.1 above or tender or payment of a deposit in paragraph 16.2 above, as the case may be.
 - 16.4.3. If a deposit has been paid regarding a refused Request for access, the Information Officer concerned must repay the deposit to the Requester.
 - 16.4.4. The Information Officer may withhold a Record until the Requester concerned has paid the applicable fees (if any).

- 16.5. A Requester whose Request for access to a Record has been granted must pay an Access fee for reproduction and search and preparation, respectively, and for any time reasonably required more than the prescribed hours to search for and prepare (including making any arrangements) the Record for disclosure.
- 16.6. Access fees must provide reasonable Access fees for
 - 16.6.1. the cost of making a copy of a Record, or a transcription of the content of a Record, if applicable, and the postal fee; and
 - 16.6.2. the time reasonably required to search for the Record and disclose the Record to the Requester;
 - 16.6.3. the cost of making any arrangement regarding the above search, preparation, and disclosure to the Requester.
 - 16.6.4. The charging of fees shall always be subject to the determination and exclusion of specific categories of persons as determined by the Minister or any other Government Gazette notice regulating fees and reproduction for particular professions.

17. REFUSAL OF ACCESS REQUESTS

- 17.1. After due consideration and within 30 days, the Information Officer/Deputy Information Officer will decide and give notice with reasons to the requester in writing to that effect.
- 17.2. This 30-day period, within which Reach must decide whether to grant or refuse the request, may be extended for up to thirty days.
- 17.3. If the request is for a large volume of information and the information cannot be reasonably obtained within the original 30-day period, Reach will notify the requestor in writing should an extension be sought.
- 17.4. If the access request is granted, and before the processing of the request, an access fee may be required for the search, reproduction and/or preparation of the records, and this fee will be calculated based on the Prescribed Fees, as gazetted from time to time.
- 17.5. The Information Officer will inform the requester of such an amount and the process that needs to be followed to fulfil this requirement. The Information Officer may also request a deposit of up to one-third of the access fee.
- 17.6. If a deposit regarding a refused access request has been paid, then the Information Officer must refund the deposit to the requestor.

18. RECORDS THAT ARE LOST OR CAN NOT BE FOUND OR DO NOT EXIST

- 18.1. If all reasonable steps have been taken to find a Record requested, and there are reasonable grounds for believing that the Record: -
 - 18.1.1. is in Reach's possession but cannot be found or
 - 18.1.2. does not exist.
- 18.2. The Information Officer must, by way of affidavit or affirmation, notify the Requester that it is not possible to give access to that Record.

- 18.3. The affidavit or affirmation referred to above must fully account for all steps taken to find the Record in question or to determine whether the Record exists, as the case may be, including all communications with every Person who searched on behalf of the Information Officer. For purposes of this Manual, the notice in paragraph 18.2 above is to be regarded as a decision to refuse a Request for access to the Record concerned.
- 18.4. If, after notice is given in paragraph 18.2 above, the Record in question is found, the Requester concerned must be given access to the Record unless access is refused on grounds of refusal contemplated in this Manual or the Act.

19. **GROUNDINGS FOR REFUSAL OF ACCESS TO RECORDS**

19.1. The following are grounds on which Reach may refuse an access request:

- 19.1.1. Mandatory protection of the privacy of a third party, which would involve the unreasonable disclosure of personal information to that natural person. Personal information is as defined by POPIA.
- 19.1.2. Mandatory protection of a third party's commercial and confidential information if the record contains: -
- 19.1.2.1. trade secrets of that party;
 - 19.1.2.2. financial, commercial, or technical information which disclosure would likely cause harm to the economic or commercial interests of that party;
 - 19.1.2.3. information disclosed in confidence by a third party to the company;
 - 19.1.2.4. mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
 - 19.1.2.5. mandatory protection of individuals' safety and property protection;
 - 19.1.2.6. mandatory protection of records which could be regarded as privileged in legal proceedings.
 - 19.1.2.7. Reach's commercial activities may include: -
 - 19.1.2.7.1. trade secrets of Reach;
 - 19.1.2.7.2. financial, commercial, scientific, or technical information which disclosure could cause harm to the economic or commercial interests of Reach.
 - 19.1.2.8. If the records cannot be found or do not exist, all reasonable steps have been taken to find the requested record. In that case, the head of a private body, by way of affidavit or affirmation, is required to notify the requester that it is not possible to give access to that record and set out the steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communications with every person who searched on behalf of the head.
 - 19.1.2.9. If, after the said notice is given and the record in question is found,

the requester concerned must be given access to the record unless access is refused on any other grounds.

20. **LOGGING OF COMPLAINTS**

Should a requester be unsatisfied with the decision, a complaint may be lodged in writing to the Information Regulator on a Form that corresponds substantially with Form 5 of Annexure A to the Regulations.

21. **RIGHTS OF THIRD PARTIES**

21.1. Notice to Third Parties:

21.1.1. The Information Officer considering a Request for access to a Record shall take all reasonable steps to inform a Third Party to whom or to whom the Record relates the Request and the details of such request.

21.1.2. The Information Officer must inform a Third Party as soon as reasonably possible, but in any event, within 21 days after that Request is received and by the fastest means possible

21.2. Representation and consent by Third Parties:

21.2.1. A Third Party informed in terms of paragraph 21.1 above of an access request may, within 21 days after being so informed-

21.2.2. make written or oral representations to the Information Officer concerned about why the Request should be refused or

21.2.3. appear in person or using representation before the Information Officer or

21.2.4. give written consent for the disclosure of the Request to the Requester concerned.

22. **CLASSIFICATION & CATEGORIES OF SENSITIVE AND PROTECTED RECORDS**

The Act and POPIA both contain categories of Records that are, by their sensitivity, protected. Special rules apply, and various other laws also apply to these Records. For expedience and clarity, these records are categorised into two main groups: those related to natural people and those related to juristic persons such as private bodies. These can be found in Sections 61, 62, 63, and 64 of the PAIA and Sections 26-33 of POPIA. The relevant classifications and categories are contained in Schedule 1 of this Manual.

23. **UPDATES TO THE MANUAL**

This Manual is updated from time to time.

24. **AVAILABILITY OF MANUAL AND FORMS**

A copy of this Manual is available for inspection free of charge at our place of business and is open to the public on the Reach website at www.reachdigitalhealth.org.

25. **REMEDIES**

An aggrieved party can also resort to the following remedies in an attempt to have a grievance addressed:

- 25.1. Report the matter to the Information Regulator, who has extensive powers in PAIA and POPIA to investigate and, amongst others, issue compliance notices, etc.
- 25.2. If the matter falls within the ambit of the Consumer Protection Act, report the matter to the National Consumer Tribunal, the details of which are available at www.thenct.org.za.
- 25.3. If any offence has been committed regarding destroying, damaging, altering, concealing or falsifying Records in Section 90 of the Act, any contravention of Regulation 9 of the Regulations relating to the Manual, neglecting regular updates, or any other offences concerning POPIA. In that case, the matter may be reported to the Information Regulator, the South African Police Service or both.

ACCEPTANCE BY REACH DIGITAL HEALTH NPC BY THE FOLLOWING DULY AUTHORISED OFFICIAL:



DEBBIE ROGERS
CHIEF EXECUTIVE OFFICER

SCHEDULE 1: Classification and categories held by REACH (section 51(1)(e))

AA - Automatically Available:

Records available in the public domain or intended to be placed in the public domain.

Personal Information: means an identifiable, living or deceased, natural person, and where applicable, an identifiable, existing juristic person including, but not limited to, pregnancy, age, etc.

Special Personal Information:

Religious or Philosophical beliefs, Race or Ethnic origin, Trade Union Membership, Political persuasion, Health and sex life, Criminal Behavior.

Category 1:

A Record containing information about research being or to be carried out by or on behalf of a Third Party or Reach.

Category 2:

Sensitive commercial records of Reach contain Reach's trade secrets, etc.

Category 3:

Sensitive commercial Records relating to other Private Bodies. Trade secrets of a Third Party or Data Subject.

Category 4:

Records relating to the safety of individuals and protection of property

Category 5:

Information protected subject to an obligation of confidentiality under office, employment, profession, and privileged information or by agreement

Detail	AA	Personal Information	Special personal information	CAT 1	CAT 2	CAT 3	CAT 4	CAT 5
ACCOUNTING/FINANCIAL RECORDS								
Annual financial statements	X				X	X		
General ledger	X				X			
Bank statements,	X				X			
Customer and supplier statements					X	X		
Invoices (general)	X				X	X		
Deposit slips	X				X			
Cash books					X			
Petty cash books					X			
Fixed asset register					X			
Tax returns and assessments					X			
VAT returns					X			
Lease or installments sale agreements					X			
Budgets plans					X			
Business plans					X			
Insurance records					X			
Credit agreements	X	-	-	-	X	-	-	-
Capital expenditure	-	-	-	-	X	-	-	-
Invoices with T & C's	X				X	X		
Quotations	X				X	X		
Receipts					X	X		
Confirmation of Banking details	X				X			
Cash Flow Projections					X			
Other	-	-	-	-	-	-	-	-
STAFF/EMPLOYEE RECORDS								
Training manuals						X		
Salary scales					X			
Employment Equity Plans		X			X			
Attendance Register		X						X
Disciplinary Records		X	X					X

Detail	AA	Personal Information	Special personal information	CAT 1	CAT 2	CAT 3	CAT 4	CAT 5
Employee Information Records		X	X					X
Employee Loans		X						X
Employment Applications		X						
Employment Contracts		X						X
Employment Equity Reports		X			X			
Group Life	-	X	-	-	-	-	-	X
IRP 5 and IT 3 Certificates		X			X			
Letters of Appointment		X						X
Leave Applications		X						
Maternity Leave Policy		X						
Payroll		X						X
Personnel Files		X	X					X
Policies processes and Procedures							X	
Recruitment and Appointments		X				X		
Salary and Wage Registers		X						X
Salary Slips and Wage Records		X						X
Scholarships and Bursaries		X						
Staff Records after Employment	-	X	X	-	-	-	-	-
Study Assistance Schemes		X						
Time Records		X						
Labor Inspection Reports	-	-	-	-	-	-	-	-
Training and Development		X						
UIF, PAYE and SDL Returns		X			X			X
Workmen's Compensation Documentation	-	X	-	-	X	-	-	-
OHS Reports	-	X	-	-	X	-	-	-
OHS Assessments	-	X	-	-	X	-	-	-
OHS Minutes	-	X	-	-	X	-	-	-
Annual Training Reports	-	X	-	-	X	-	-	-
Workplace Skills Plan	X	-	-	-	X	-	-	-

Detail	AA	Personal Information	Special personal information	CAT 1	CAT 2	CAT 3	CAT 4	CAT 5
CCMA/Labor Court/Bargaining Council Awards/Disputes	X	X	-	-		-		-
Medical Records		X	X					X
Safety Incident Reports	X	X	X	-	-	-	-	-
Confidentiality Agreements		X			X			X
Resignation Letters		X						
Temporary Employment Records		X	X					
Other	-	-	-	-	-	-	-	-
INSURANCE RECORDS								
Claim records	-	-	-	-	-	-	-	-
Details of coverage, limits, and insurers	-	-	-	-	-	-	-	-
Insurance policies	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-
INTELLECTUAL PROPERTY								
License agreements					X			
Secrecy agreements					X			
Research and development agreements					X			
Consulting agreements					X			
Use agreements					X			
Joint venture agreements	-	-	-	-	-	-	-	-
Joint development agreements					X	X		
Royalty agreements	-	-	-	-	X	-	-	-
Franchise agreements	-	-	-	-	-	-	-	-
Warranties	-	-	-	-	X	-	-	-
Settlement Agreements					X			
Litigation Records					X			
Service Agreements					X			
Supplier Agreements					X			
Merchant Agreements					X			
Export Agreements	-	-	-	-	-	-	-	-

Detail	AA	Personal Information	Special personal information	CAT 1	CAT 2	CAT 3	CAT 4	CAT 5
Remuneration Tables/Schedules		X			X			
Unique procedures		X			X			
Research records obtained or generated itself		X		X				
Other	-	-	-	-	-	-	-	-
RECORDS REFLECTING SPECIAL PERSONAL INFORMATION:								
Religious or philosophical beliefs	-	-	X	-	-	-	-	-
Race or Ethnic origin			X					
Trade Union Membership	-	-	-	-	-	-	-	-
Political persuasion	-	-	-	-	-	-	-	-
Health			X					
Sex life	-	-	-	-	-	-	-	-
Criminal behavior			X					
Biometrics	-	-	X	-	-	-	-	-
Other	-	-	-	-	-	-	-	-
CORPORATE GOVERNANCE RECORDS:								
Directors Agreements	-	X	-	-	X	-	-	-
Share Certificates	-	X	-	-	X	-	-	-
Directors Resolutions		X			X			
Shareholder Agreements	-	-	-	-	X	-	-	-
Standard MOI	-	-	-	-	-	-	-	-
Special drafted MOI		X			X			

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