

**PICK n PAY MEDICAL SCHEME
(‘the Scheme’)**

PAIA MANUAL

**Prepared in terms of section 51 of the Promotion of
Access to Information Act 2 of 2000 (as amended)**

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Access to Information Manual

1. List of acronyms and abbreviations

• CEO	Chief Executive Officer
• Data subject	A data subject is a person to whom Personal Information relates
• DIO	Deputy Information Officer
• IO	Information Officer
• IR	Information Regulator
• Minister	Minister of Justice and Correctional Services
• PAIA	Promotion of Access to Information Act No 2 of 2000 (as amended)
• PO	Principal Officer
• POPIA	Protection of Personal Information Act No 4 of 2013
• Regulator	Information Regulator
• Requester	Any person making a request for access to a record
• Republic	Republic of South Africa
• Third party	Means any natural or juristic person other than the requester, a party acting on behalf of the requester or, alternatively, Pick n Pay Medical Scheme itself
• Pick n Pay Medical Scheme	Refers to Pick n Pay Medical Scheme ('the Scheme') with registration number 1563

2. Purpose of PAIA

This manual is compiled in accordance with Section 51 of PAIA. It is intended to give a description of the records held by and on behalf of the Scheme; to stipulate grounds for refusal of access to any such records; to outline the procedure to be followed and the fees payable when requesting access to any of these records in the exercise of the right of access to information; with a view of enabling requestors to obtain records which they are entitled to in a quick, easy and accessible manner.

The purpose of this PAIA manual is to:

- 2.1 check the categories of records held by the Scheme which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the Scheme by providing a description of the subjects on which the Scheme holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the Scheme which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the Scheme will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

- 2.9 know if the Scheme has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the Scheme has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. Contact details of the Information Officer of the Pick n Pay Medical Scheme

Information Officer	Ms Dawn Theron
Telephone number	084 845 4388
Email address	dawntheron@pnp.co.za
Deputy Information Officer	None
Scheme postal address	PO Box 2212, Bellville 7535
Scheme physical address	Building 6, Parc du Cap, Bellville 7530
Telephone number	0802 228 922
Email address	dawntheron@pnp.co.za
Website	www.pnpms.co.za

4. Further Guidance from the Information Regulator

The Information Regulator has, in terms of the Act, compiled a PAIA guide in every official language containing information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act, in a manner that is easily comprehensible to any such person.

Any enquiries regarding the guide should be directed to:

Postal address	PO Box 31533, Braamfontein, Johannesburg 2017
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg 2191
Telephone number	010 023 5200
Email address for general enquiries	enquiries@inforegulator.org.za
Email address to lodge a complaint	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

5. Records of the Scheme

The Scheme holds records in the categories listed below. The fact that we list a record type here does not necessarily mean that lists are complete or that we will disclose such records. All access is subject to the evaluation processes outlined herein, which will be exercised in accordance with the requirements of the Act.

The accessibility of the documents listed below may be subject to the grounds of refusal set out in section 6 of this manual.

The information is classified and grouped according to records relating to the following subjects and categories:

a. Records that are automatically available

The following information is available via the Scheme's website (www.pnpms.co.za) and persons do not have to fill out a form to request such information:

- Pick n Pay Medical Scheme rules;
- benefit and contribution information;
- newsletters and brochures;
- membership and managed care application forms;
- privacy policy; and
- PAIA manual.

b. Personnel records

'Personnel' refers to any person who works for or provides services to or on behalf of the Scheme and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Scheme and includes, without limitation, Trustees (member elected and employer appointed), all permanent, fixed-term, temporary and part-time staff (employees, consultants, contractors), as well as Trustees (member elected and employer appointed):

- personal records provided by personnel;
- records provided by a third party relating to personnel;
- conditions of employment and other personnel-related contractual and quasi-legal records (employment contracts, workplace policies, disciplinary records, termination records; minutes of meetings; performance management records and systems);
- internal evaluation records and other internal records;
- correspondence relating to personnel; and
- training schedules and material.

c. Member/Beneficiary-related records

A 'member/beneficiary' refers to any natural or juristic entity that is a registered member of the Scheme and who is entitled to benefits and services as set out in the Scheme rules:

- records pertaining to the diagnosis, treatment or health of a member/beneficiary of the Scheme;
- records provided by a member/beneficiary to a third party acting for or on behalf of the Scheme;
- records provided by a third party;
- records generated by or within the Scheme relating to its members/beneficiaries.

d. Private body records

These records include, but are not limited to, the records which pertain to the Scheme's own affairs. Financial records (including statements, tax-related documents, auditor reports, accounting records and invoices):

- operational records;
- information technology;
- communication;
- asset register;
- administrative records;
- rules and benefit records;
- statutory records;
- governance records, including but not limited to annual reports, statutory returns, internal policies and procedures, notices and minutes and others; and
- human resources policies.

e. Internal records relating to the business of the Scheme, which includes, but is not limited to:

- the registration of Pick n Pay Medical Scheme;
- minutes and policies;
- annual and other reports;
- financial records;
- claims and reimbursement records;
- records submitted to the Council for Medical Schemes;
- application forms;
- appeals and complaints/disputes;
- operational records;
- policies and procedures;
- contracts and licences;
- trademarks and other intellectual property;
- marketing records;
- other internal policies and procedures;
- internal correspondence;
- statutory records;
- insurance policies and records; and
- records relating to the Trustees and the Principal Officer; etc.

f. Health records, which include:

- motivations, chronic forms, etc.;
- member/beneficiary lists;
- medical reports;
- Scheme records;
- consents and awards;
- needs and risk assessments;
- financial and accounts information;
- research information;
- actuarial information; and
- profiling and similar information.

It must be noted that, in the health sector, personal, health and patient information is protected by legislation and ethical rules, and disclosure can only take place, if at all, within those frameworks.

g. Other party records

- Personnel, customer or private body records which are held by another party, as opposed to the records held by the Scheme itself
- Records held by the Scheme pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the Scheme's contractors/suppliers

The Scheme may possess records pertaining to other parties, including, but not limited to, contractors, suppliers and service providers and such other parties may possess records that can be said to belong to the Scheme.

h. Supplier and service provider records, which include:

- supplier registrations;
- contracts;
- confidentiality agreements and non-disclosure agreements,
- communications;
- logs and delivery records; and
- commissioned work and similar information, some of which might be provided to the Scheme by such suppliers and providers under service and other contacts.

i. Technical records, which include:

- manuals, logs, electronic and cached information;
- statutory body records; and
- trade association information and similar product information.

j. Environment and market information, which include information bought; publicly available information; commissioned information which pertains to the specific sector and market of our business and factors that affect the business; and information relating to professional and healthcare environment.

k. Records available in accordance with other legislation

A requester may also request information that is available in terms of other legislation, that all organisations are required to hold. A full list can be found here, but it is not an exhaustive list, as it may change. The Scheme also holds records that the law specifically requires it to retain such as:

- Medical Schemes Act 131 of 1998;
- Companies Act 71 of 2008;
- Income Tax Act 58 of 1962;
- Value Added Tax Act 89 of 1991;
- Labour Relations Act 66 of 1995;
- Basic Conditions of Employment Act 75 of 1997;
- Employment Equity Act 55 of 1998;
- Unemployment Insurance Act 63 of 2001;
- Unemployment Contributions Act 4 of 2002;
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993;
- Occupational Health and Safety Act 85 of 1993;
- Prevention and Combatting of Corrupt Activities Act 12 of 2004; and
- Protection of Personal Information Act 4 of 2013.

6. Grounds for refusal of access to records

The Scheme may refuse a request for information on the following basis:

- a. Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- b. Mandatory protection of the commercial information of a third party, if the record contains:
 - trade secrets of that third party;
 - financial, commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and
 - information disclosed in confidence by a third party to the Scheme, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition
- c. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation;
- d. Mandatory protection of the safety of individuals and the protection of property;
- e. Mandatory protection of records which would be regarded as privileged in legal proceedings;
- f. The commercial activities of the Scheme, which may include:
 - trade secrets of the Scheme;
 - financial, commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Scheme; or
 - information which, if disclosed, could put the Scheme at a disadvantage in negotiations or commercial competition.
- g. The research information of the Scheme or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage; or
- h. Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

7. Access to records held by Pick n Pay Medical Scheme

- a. Records held by the Scheme may be accessed by request only once the prerequisite requirements for access have been met.
- b. A requester is any person making a request for access to a record of or held by the Scheme. There are two types of requesters:

Personal requester:

- A personal requester is a requester who is seeking access to a record containing personal information about the requester.
- The Scheme will voluntarily provide the requested information or give access to any record regarding the requester's personal information. The prescribed fee for reproduction of the information requested will be charged.

Other requester:

- This requester (other than a personal requester) is entitled to request access to information

on third parties. However, the Scheme is not obliged to voluntarily grant access. The requester must fulfil the prerequisite requirements for access in terms of the Act, including the payment of a request and access fee.

8. Request procedure

A requester requiring access to information held by the Scheme must complete this prescribed [Form 2](#), submit it to the Information Officer at the postal or physical address, fax number or electronic mail address recorded in section 3 and pay a request fee and a deposit, if applicable:

- a. The prescribed form must be completed with enough detail to at least enable the Information Officer to identify:
 - the record or records requested;
 - the identity number of the requester;
 - the Scheme membership number of the requester, if a registered member of the Scheme;
 - the form of access required, if the request is granted;
 - the email address, postal address or fax number of the requester;
 - the right the requester seeks to exercise or protect and why the requester needs the requested record to exercise or protect that right and must:
 - i. provide any other way the requester would like to be informed of our decision other than in writing, and
 - ii. provide proof of the capacity in which the requester is making the request if it is made on behalf of someone else (the Scheme will decide whether this proof is satisfactory).
- b. If the record is part of another record, the requester will only be able to access the part(s) that pertain(s) to the information requested.
- c. If the requester does not use the standard form, the Scheme may reject the request due to lack of procedural compliance, refuse it if the requester does not provide sufficient information, or delay it.
- d. The Scheme will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Information Officer that the above time periods should not be complied with.
- e. The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the manner and the particulars so required.
- f. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer.
- g. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- h. The requester must pay the prescribed fee before any further processing can take place.
- i. Access to health information or records:
 - Where a request is made for access to information or a health record about the physical

or mental health or well-being ('health information or records') of the requester or person acting on behalf of a person to whom a record relates, and the Information Officer is of the opinion that the direct disclosure of such health information or record would cause serious harm to the requester's physical and/or mental health or well-being, the Information Officer may, before granting the request for access, consult with a health practitioner nominated by the requester.

- If the requester is under the age of 16 years, a person having parental responsibilities must nominate the health practitioner or, if the requester is incapable of managing his or her affairs, a legal representative or other person appointed by the court to manage his or her affairs must nominate the health practitioner.
- If the health practitioner is of the opinion that the disclosure of the health information or record would likely cause serious harm to the requester's physical and/or mental health or well-being, the Information Officer may only grant access to the health information or record if the requester proves, to the satisfaction of the Information Officer, that adequate provision has been made for counselling or other arrangements before, during or after the disclosure of the health information or record to alleviate or avoid the harm to the requester. Before the requester is given access to the health information or record, the person responsible for such counselling or arrangements must be given access to the health information or record.

9. Decision

- a. The Scheme will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- b. The 30-day period with which the Scheme has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 days if the request is for a large amount of information, or the request requires a search for information held at another office of the Scheme and the information cannot reasonably be obtained within the original 30-day period.
- c. The Information Officer will notify the requester in writing should an extension be sought.

10. Fees

- a. The Act provides for two types of fees, namely:
 - a request fee, which will be a standard fee; and
 - an access fee, which the requester must pay if access is granted; it must be calculated by taking into account the time spent to handle the request, or if the time has exceeded, the prescribed hours to search and prepare the record for disclosure and reproduction costs, search and preparation time and cost, as well as postal costs.
- b. When the request is received by the Information Officer, the Officer will by notice require the requester to pay the prescribed request fee (if any), which will also set out the application procedure, before further processing the request.
- c. If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer will notify the requester to pay as a deposit the prescribed portion of the access fee, which would be payable if the

request is granted. The deposit may be up to one third of the prescribed access fee.

- d. If a deposit has been paid in respect of a request for access, which is refused, the Information Officer will repay the deposit to the requester.

11. Remedies available when the Scheme refuses a request for information

a. Internal remedies

Requesters who are dissatisfied with a decision of the Information Officer will have the option to refer the matter to the Scheme's Audit Committee for consideration. If the requester is still dissatisfied with the outcome of a decision escalated to the Scheme's Audit Committee, he or she will have to exercise external remedies at his or her disposal.

b. External remedies

A requester or a third party, who is dissatisfied with the above internal remedies and the Scheme's refusal to disclose information or the disclosed information, may within 180 days of notification of the decision, apply to a court with appropriate jurisdiction, or complain to the Information Regulator at PAIAComplaints@inforegulator.org.za.

12. How the Scheme processes and protects personal information

The Scheme processes the personal information of various categories of people for various purposes. Please refer to our website for our privacy policy.

12.1 Categories of people

- Personnel, including employees
- Beneficiaries, including children
- Contractors, vendors or suppliers
- Trustees
- Related organisations like healthcare providers and other providers, including administration, managed care, chronic medication designated service providers and professional services providers.

12.2 Purpose of the processing of the records described

The purpose of processing the information contained in the records listed above, is:

- i. In relation to the business/internal records:
 - for good corporate governance and to comply with business, financial, medical schemes and tax legislation
- ii. In relation to employees:
 - for the execution of employer/employee agreements and labour legislation; and
 - the retention of employment records, as legislated
- iii. In relation to our beneficiaries:
 - for the collection of membership fees for the services so provided;
 - to provide reimbursement to defray the cost of healthcare;
 - to facilitate obtaining healthcare services and products;
 - to develop health products;

- to mitigate risk; and
 - for retention of records, as required by law.
- iv. In relation to suppliers and service providers:
- for the execution of the supplier and service level agreements; and
 - for record retention, as legislated.

12.3 Categories of personal information

The Scheme processes many different categories of personal information, including:

- contact details, such as phone numbers, physical and postal addresses, and email addresses;
- personal details, such as names and identity numbers;
- demographic details, such as gender and age groups;
- health information, including diagnosis, treatment or health of the members of the Scheme;
- sexual information, biometric information, information about criminal behaviour and religion; and
- financial information, such as bank account numbers.

12.4 Planned trans-border flow of personal information

The Scheme has planned trans-border flow of personal information in the form of cloud storage. No other trans-border flow of information is planned beyond the following:

- to administer international claims; or
- if the requester gives us an email address that is hosted outside South Africa; or
- for processing, storage or academic research; or
- to administer certain services, for example cloud services.

12.5 The information security measures

The Scheme secures data by maintaining reasonable measures to protect personal information from loss, misuse and unauthorised access, disclosure, alteration and destruction. It also takes reasonable steps to keep personal information accurate, current, complete, confidential and reliable for its intended use.

13. Availability of the manual

A copy of the manual is available in English:

- 13.1 at www.pnpms.co.za
- 13.2 the above address of the Scheme for public inspection during normal business hours;
- 13.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 13.4 to the Information Regulator upon request.

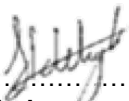
The Scheme's duly appointed Administrator will ensure that its staff are aware of and adequately trained and equipped to direct any requester who wishes to gain access to information, as described in this manual.

14. Updates to this manual

The Information Officer of the Scheme will update this manual when required.

15. Revision history

This PAIA manual has been set and approved by the Board of Trustees (BOT) at a meeting held on 10 September 2026.


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Chairperson
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Principal Officer