



PAIA Manual

1. Introduction to Healthcare Navigator

Healthcare Navigator CC is a consulting business offering consulting services to clients (predominantly in the healthcare sector) locally and abroad. It is incorporated as a close corporation under the laws of South Africa.

2. Contact Details of Healthcare Navigator

Business Name:	Healthcare Navigator CC
Registration Number:	2002/032631/23
Physical Address:	10 Mount Cornell Crescent, Midstream
Postal Address:	Postnet Suite 842, Private Bag X1007, Lyttelton, 0140. Pretoria, South Africa
Telephone Number:	+27 (0)83 381 6428
Email address:	esme@healthcarenavigator.co.za
Website address:	https://www.healthcarenavigator.co.za

3. Information Officer of Healthcare Navigator

Name:	Esmé Van den Berg
Contact number:	+27 (0) 83 381 6428
Email address:	esme@healthcarenavigator.co.za

4. Guide of the Information Regulator

The Information Regulator compiled a Guide, in terms of Section 10 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), to assist persons wishing to exercise their rights in terms of this Act. This Guide contains, amongst others, the following information:

- The purpose of PAIA,

- The manner, form and costs of a request for access to information held by a body,
- Legal remedies when access to information is denied,
- Assistance that the Information Regulator can provide,
- Mechanisms to obtain the contact details of Information Officers and
- Relevant legislation.

The Guide is available in all the official languages on the website (<https://infoeregulator.org.za/paia-guidelines/>) of the Information Regulator or can be obtained from the Information Regulator at:

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

Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017

Email address: enquiries@infoeregulator.org.za

Website: <https://infoeregulator.org.za/>

The Guide can also be obtained upon request from Healthcare Navigator's Information Officer. A copy of the Guide is available for public inspection during regular office hours at the office of Healthcare Navigator.

5. Records

Subjects on which the Healthcare Navigator holds records	Categories of records
Close Corporation	Statutory and governance records, financial records, assets, business agreements and engagements, strategic records and insurance records
Clients	Agreements, correspondence, services rendered, invoices and payment information

6. Information Available in terms of Legislation

Healthcare Navigator holds records as may be required in terms of the legislation listed below subject to the specific protection offered by these laws:

Applicable Legislation	Category of Records
Close Corporations Act 69 of 1984	CK1 and related statutory documents
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Tax-related information of the business

Promotion of Access to Information Act 2 of 2000	PAIA Manual and PAIA Guide
Protection of Personal Information Act 4 of 2013	PAIA Manual and policies related to the protection of personal information
Value Added Tax Act 89 of 1991	VAT records

7. Records Automatically Available

The information on the website is automatically available without having to request access by completing Form 2. Access and usage of the information on the website are subject to the website terms and conditions and the Privacy Policy of Healthcare Navigator.

8. Purpose of Processing Personal Information

Healthcare Navigator processes the personal information of data subjects for the following purposes:

- to conduct and manage the business in accordance with the law,
- for communication purposes,
- for financial management,
- for the maintenance of our records,
- for marketing purposes,
- for reporting to persons and bodies, as required and authorised in terms of the law or by the data subject,
- for procurement purposes,
- for historical, statistical and research purposes,
- for enforcement of the business' rights and/or
- for any other lawful purpose related to the activities of the business.

9. Data Subjects, Their Personal Information and Potential Recipients of Information

Healthcare Navigator holds personal information concerning the categories of data subjects specified below. It will share data subjects' personal information (including their records) as specified.

Data Subjects	Clients, service providers, suppliers and other public or private bodies
Categories of personal information	Person/entity's name and contact details, titles and contact details of relevant persons/office bearers, agreements and related information, registration numbers, business and financial information and correspondence.
Potential Recipients	<ul style="list-style-type: none"> • Law enforcement and government agencies or other related third parties:

	<p>From time to time, Healthcare Navigator may be required to provide personal information to a third party to comply with a subpoena, court order, government investigation, reporting obligation, or another legal process. If Healthcare Navigator discloses personal information in this way, it will reasonably attempt to provide the relevant data subject with advance notice unless it is prohibited from doing so or it is not appropriate in the circumstances.</p> <ul style="list-style-type: none"> • Corporate transactions: If Healthcare Navigator becomes insolvent or is involved in a merger, acquisition, reorganisation, or sale of all or a portion of the close corporation or its assets, Healthcare Navigator may share or transfer personal information as part of such corporate transaction. • Staff of Healthcare Navigator required as part of their roles and functions. • Service providers (such as IT service providers) who assist Healthcare Navigator in running its business - only if necessary, subject to confidentiality undertakings and legislation protecting the privacy of the personal information. • The accountants and/or auditors of Healthcare Navigator. • Professional advisers (including legal advisers) of Healthcare Navigator, • The insurers of Healthcare Navigator, if required.
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10. Personal Information Sent Across the Borders of the Republic of South Africa

Healthcare Navigator is not planning to send personal information about any data subject to any third party in a foreign country. It stores electronic information, including personal information of data subjects, in the Microsoft 365 'cloud,' which may be based outside of South Africa. Invoices are created and sent through Sage Online (<https://www.sage.com/en-za/>). Sage may store information outside of the Republic of South Africa. Should it be required by Healthcare Navigator to send information to third parties in foreign countries, relevant data subject consent will be obtained, if needed, unless the information may be lawfully transferred across the borders. Transfers of such information will occur in accordance with the requirements of the law.

11. Security Measures to Protect Personal Information

Healthcare Navigator is committed to ensuring the security of the personal information in its possession or under its control to protect it from unauthorised processing and access as well as loss, damage or unauthorised destruction. It continually reviews its information protection measures to ensure the information's security, integrity and confidentiality, following industry best practices. The measures it adopts to ensure the security of

personal information include technical and organisational measures to prevent unauthorised access, loss or use of personal information.

12. Procedure to Obtain Access to Records or Information

The fact that information and records are held by Healthcare Navigator as listed in this Manual should not be construed as conferring upon any requester any 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. If a public body lodges a request, the public body must be acting in the public interest. Access to records and information is not automatic. Any person requesting access to any of the above records or information must complete a request form (Form 2), available from the Information Officer and the Information Regulator at the contact details stipulated above.

The requester must provide sufficient details on the request form to enable the Information Officer to identify the record and the requester. Requesters must identify the right they seek to exercise or protect and explain why the requested record is required for that right's exercise or protection. 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 satisfaction of the Information Officer. Access to the requested records or information or parts of the records or information may be refused in terms of the law. Requesters will be advised of the outcome of their requests.

13. Fees Payable to Obtain the Requested Records or Information

Fees may be charged for requesting and accessing information and records held by Healthcare Navigator. These fees are prescribed in terms of PAIA. Details of the fees payable may be obtained from the Information Officer. The fees are also available from the Information Regulator.

14. Availability of this Manual

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