MANUAL PREPARED IN TERMS OF SECTION 51 OF
THE PROMOTION OF ACCESS TO INFORMATION ACT (ACT 2 OF 2000)

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1. INTRODUCTION TO THE PRACTICE

This is the private radiology practice of Preventive Imaging Incorporated trading as Scan for Life. The practice is conducted in accordance with the requirements of the Health Professions Act 56 of 1974 and is subject to the authority of the Health Professions Council of South Africa (HPCSA). Practitioners who are registered at the HPCSA provide radiology services within the scope and ambit of their competence and training at the practice. The practitioners are bound by the Ethical Rules issued by the HPCSA, most notably the duty to preserve patient confidentiality, unless legislation of a count order provides otherwise.
2. CONTACT DETAILS

Designated Head of Scan for Life: Dr Louis Sulman
Registration Number: 2012/125980/21
Practice number: 0161241
Postal Address of Scan for Life: P.O Box 61 Parklands 2121
Physical address of Scan for Life: The Netcare Rosebank Hospital - Ground floor 14 Sturdee Avenue Rosebank
Telephone number of Scan for Life: 011 447-5669 or 011 447-7669
Fax number of Scan for Life: 011 447-7928
E-Mail address of Scan for Life: info@scanforlife.co.za
Website address of Scan for Life: www.scanforlife.co.za
VAT Number: 4560220263
Person designated to act on behalf of the Designated head: Germaine Lavery
Contact details of person designated to act: germaine.lavery@radimaging.co.za

3. THE GUIDE OF THE SA HUMAN RIGHTS COMMISSION.

A Guide has been compiled in terms of Section 10 of PAIA by the South African Human Rights Commission (SAHRC). It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages.

The Guide is available for inspection, inter alia, at the office of the offices of the Human Rights Commission at 29 Princess of Wales Terrace, corner York St. Andrews Street, Parktown, Johannesburg, Gauteng and at www.sahrc.org.za

For further information please contact the SAHRC:

E-mail: PAIA@sahrc.org.za
Postal adress: Private Bag 2700, Houghton, 2041
Telephone: +27 11 484-8300
Fax: +27 11 484-0582

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4. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

<table>
<thead>
<tr>
<th>CATEGORIES OF RECORDS</th>
<th>DOCUMENT TYPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Records relating to the form of practice</td>
<td>Documents pertaining to an incorporated company as required by the Companies Act 71 of 2008, including, but not limited to the prescribed certificates, memorandum and articles of association / memorandum of incorporation, forms and registers of directors and shareholders; Company rules, Minute books, Resolutions, Shareholder's agreements / Association agreement.</td>
</tr>
<tr>
<td>Records relating to the professional status of persons working in the practice</td>
<td>Certificates and cards proving professional registration at the HPCSA and other relevant statutory Boards and Councils; Proof of payment of annual and registration fees; Certificates of good standing.</td>
</tr>
<tr>
<td>Records related to assets, financial records and records held in terms of the Medicines and Scheduled Substances Act (Medicines ACT)</td>
<td>Register of Mortgages, Debentures and Fixed Assets; Annual Financial Statements, including Director's reports; Auditor's reports, Books of Account, including journals, ledgers, supporting schedules to and ancillary books of account; Accounting records; Bank statements; Stock sheets; Delivery notes, orders, invoices, statements, receipts, vouchers and bills of exchange; Registers to be kept in terms of the Medicine Act.</td>
</tr>
<tr>
<td>Patient records</td>
<td>Records are kept in respect of all patients</td>
</tr>
<tr>
<td>Employment records</td>
<td>Employment contracts; Time worked by each employee: Attendance register; Employent equity plan and reports; Salary and wage register; Collective agreements; Disciplinary proceedings, Arbitration awards; CCMA cases, Skills Development Plan and training records; Staff, including former staff, records; Expense accounts, IRPS's and tax information pertaining to employees; Employee contracts; Performance management records; incentive schemes; Study assistance schemes; Conditions of employment and policies (including but not limited to leave policies, motor vehicle scheme, telephone policy, etc.) Group personal accident and group life insurance policies and related records; Locum agreements and records.</td>
</tr>
<tr>
<td>Provident and retirement fund records</td>
<td>Provident Fund Rules; Account records; Minutes of Meetings of trustees and members</td>
</tr>
<tr>
<td>Health and safety records</td>
<td>Evacuation plan; information related to Health and Safety Committee / Officer.</td>
</tr>
<tr>
<td>Records related to property (movable and immovable)</td>
<td>Title Deeds; Leases; Building plans; Mortgage Bonds or servitudes to fixed property; Asset register; Finance and Lease Agreements, Medicines and scheduled substances held in terms of the Medicines Act; Radiation control license.</td>
</tr>
<tr>
<td>Records relating to intellectual property</td>
<td>Licence agreements; Non-disclosure agreements; Research and development agreements; Consulting agreements, Use agreements; Joint venture agreements; Strategic Plans.</td>
</tr>
<tr>
<td>Agreements</td>
<td>Manages care and medical scheme agreements; Agreements with hospitals; IT agreements (software and hardware); Agreements concerning provision of services of materials; Agreements with contractors and suppliers; Sale agreements; Purchase agreements; Lease agreements.</td>
</tr>
<tr>
<td>Tax and VAT records</td>
<td>Copies of all Tax Returns and documents relating to income Tax and VAT, including payments made.</td>
</tr>
<tr>
<td>Records relating to legal processes</td>
<td>Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation, Settlement agreements.</td>
</tr>
<tr>
<td>Insurance records</td>
<td>Insurance policies; Professional indemnity insurance, Claim's records; Details of insurance coverage, limits and insurers.</td>
</tr>
</tbody>
</table>
5. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Our practice is required to hold certain records in terms of the following legislation:

1. Basic Conditions of Employment Act 75 of 1997;
2. Children's Act 38 of 2005;
3. Companies Act 71 of 2008;
4. Compensation for Occupational injuries and Diseases Act 130 of 1993;
7. Health Professions Act 56 of 1974;
10. Medical Schemes Act 131 of 1998;
11. Medicines and Related Substances Act 101 of 1965;
12. National Health Act 61 of 2003;
14. Promotion of Access to Information Act 2 of 2000;
15. Protection of Personal information Act 4 of 2013;
16. Road Accident fund Act 56 of 1996;
19. Unemployment Contributions Act 4 of 2002;
20. Unemployment Insurance Act 63 of 2001; and

6. RECORDS AUTOMATICALLY AVAILABLE

No notice has been submitted by the practice to the Minister of Justice and Constitutional Development regarding the categories of records, which are available without a person having to request access in terms of Section 52(2) of PAIA. However, the information on the website of the practice is automatically available without having to request access in terms of PAIA.
7. PURPOSE OF PROCESSING OF PERSONAL INFORMATION

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

1. Treatment and care of patients;
2. Imaging of patients;
3. Employment and related matters of staff and other practitioners;
4. Statutory reporting; and
5. Conducting of a private radiology practice.
8. DATA SUBJECTS, THEIR PERSONAL INFORMATION AND POTENTIAL RECIPIENTS OF THIS INFORMATION

The practice holds the types of records and personal information in respect of the categories of data subjects specified below. The potential recipients of the personal information processed by the practice, as may be appropriate and relevant, in terms of the law or otherwise with the consent of the relevant data subject, are also specified.

<table>
<thead>
<tr>
<th>DATA SUBJECTS</th>
<th>CATEGORIES OF RECORDS</th>
<th>CATEGORIES OF PERSONAL INFORMATION</th>
<th>POTENTIAL RECIPIENTS OF THE PERSONAL INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directors, shareholders and employees</td>
<td>Proof of registration at and payment of fees to the HPCSA and other statutory councils; Employment contracts and records; Certificates of good standing, Indemnity and other insurance policies; Complaints, disciplinary and court proceedings, employment equity records; Provident and retirement fund records; medical scheme membership; Membership of professional societies; Salary and payroll records; Tax certificates; PAYE, UIF and SDL returns and related records; Correspondence with the HPCSA, insurers and other persons / bodies; Leave records, including study leave and sick leave; Medical certificates; Continuing Professional Development (CPD) / Training events. Certificates and records; Locum contracts; Skills development plans and records; Performance management records.</td>
<td>Names and surnames; Contact details e.g. address; telephone and fax numbers, e-mail addresses; identity numbers / dates of birth; Race, Gender, Nationality, Qualifications, Statutory council registration numbers, Practice code number; Registered profession: Category of registration; Specialist registration, Occupation, Employment records, Position held, Banking details; Employment history; Relevant medical history; Criminal behaviour and history; Correspondence: Notes and reports created in respect of patients: Tax number, returns and certificates; Leave records; Medical certificates; Salary; Employment benefits; Next-of-kin; Performance assessments;</td>
<td>SA Revenue Services (SARS); Relevant statutory bodies such as the HPCSA; Board of Healthcare Funders of SA (BHF); Companies and intellectual Property Commission; Medical schemes; Contractors and vendors; patients; Council for Medical Schemes (CMS); Relevant public bodies e.g. Compensation Commissioner, Road Accident funds, Unemployment Insurance fund; Banks; Professional societies; Relevant public bodies; including government departments e.g. Compensation Commissioner, Road Accident fund (RAF), Unemployment Insurance Fund (UIF), Department of Labour, Radiation Control; Vetting agencies e.g. of Qualifications; SAPS for police clearance certificates, Trade unions; Hospitals.</td>
</tr>
<tr>
<td>Other contractors, vendors and suppliers, e.g. Hardware and software vendors, switching companies, Insurers, auditors, legal counsel, consultants, debt collectors</td>
<td>Agreements with contractors, vendors and suppliers; Non-Disclosure Agreements; Debt collection agreements; Legal opinions and advice; Correspondence.</td>
<td>Names and surnames; Company and employer names; Contact details e.g. address, telephone and fax numbers, e-mail addresses, website; Opinions; Correspondence; Track records; Pricing; Quotes; payment records.</td>
<td>Banks</td>
</tr>
<tr>
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</tr>
<tr>
<td><strong>Patients</strong></td>
<td>Patient records; Invoices; Payment records; Correspondence.</td>
<td>Names and Surnames; Contact details e.g. address, telephone and fax numbers, e-mail addresses; identity numbers / dates of birth; Race; Gender; Nationality; Employer, Employer contact details; Medical scheme, medical scheme option and dependant status; Name, surname and contact details of a relative / friend; Medical history; Payment history; Diagnosis and procedures codes; Procedures performed; referral letters; X-rays, sans, sonars and related reports; Invoices; Complaints, Correspondence; Bank account details; Patient information forms; Consent forms.</td>
<td>Medical schemes; Managed care organisations; Insurers; employers; Debt collectors; Referring practitioners; Credit lists(Blacklists); Bodies performing peer review; Statutory / Governmental bodies e.g. HPCSA when responding to complaints, Compensation Commissioner; RAF; Hospitals; Treating medical and other relevant health care practitioners Next-of-kin.</td>
</tr>
<tr>
<td><strong>Referring doctors</strong></td>
<td>Referral notes; Correspondence.</td>
<td>Names and Surnames; Contact details e.g. address, telephone and fax numbers, e-mail addresses; Practice Code numbers; Referral letters.</td>
<td>Medical schemes; Managed care organisations; Governmental bodies e.g. HPCSA when responding to complaints, Compensation Commissioner, RAF; Hospitals; Bodies performing peer review.</td>
</tr>
<tr>
<td><strong>Hospitals</strong></td>
<td>Correspondence.</td>
<td>Names; Contact details e.g. telephone and fax numbers, e-mail addresses; Office bearers.</td>
<td>Medical schemes; Statutory / Governmental bodies e.g. HPCSA when responding to complaints.</td>
</tr>
<tr>
<td>Public Bodies (e.g. Department of Health, RAF, Compensation Commissioner, UIF) and Statutory Councils (e.g. HPCSA, CMS)</td>
<td>Complaints submitted to the relevant statutory councils; Correspondence; Newsletters and circulars issued by these councils.</td>
<td>Names; Contact details e.g. address, telephone and fax numbers, e-mail addresses; Office bearers.</td>
<td>Medical schemes; Patients.</td>
</tr>
<tr>
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<td>---</td>
</tr>
<tr>
<td>Professional Societies e.g. RSA, SAMA</td>
<td>Constitutions, Notices, Correspondence; Payment of fees.</td>
<td>Names; Contact details e.g. address, telephone and fax numbers, e-mail addresses; Office Bearers.</td>
<td></td>
</tr>
<tr>
<td>Insurers</td>
<td>Insurance policies</td>
<td>Contact details e.g. address, telephone and fax numbers, e-mail addresses.</td>
<td>HPCSA</td>
</tr>
<tr>
<td>Medical Schemes</td>
<td>Claims; Remittance advices, Correspondence</td>
<td>Contact details e.g. address, telephone and fax numbers, e-mail addresses.</td>
<td>Patients</td>
</tr>
</tbody>
</table>
9. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

The practice is not planning to send any personal information about any data subjects across the borders of the Republic of South Africa to third parties in foreign countries. Should this be required, patient consent will be obtained, where possible, and transfers will be in accordance with the requirements of the law.

10. PROCEDURE TO OBTAIN ACCESS TO THE RECORDS OR INFORMATION

The requester must complete Form C and submit this form together with a request fee, to the head of Scan for Life. The form must be submitted to the head of Scan for Life at this address, fax number, or electronic mail address as stated earlier in this manual.

Form of request:

- The requester must use the prescribed form, as attached in terms of this manual, to make the request for access to a record. This must be made to the designated head. This request must be made to the address, fax number or electronic mail address of the practice as stipulated above.

- The requester must provide sufficient detail on the request form to enable the designated head to identify the record and the requester.

- The requester should indicate which form of access is required.

- The requester should indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed.

- The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

- If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the designated head of Scan for Life.

- A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.

- Every other requester, who is not a personal requester, must pay the required request fee.

- The designated head of Scan for Life must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request.
The fee that the requester must pay to Scan for Life is currently R50,00. The requester may lodge an application to the court against the tender or payment of the request fees.

After the designated head of Scan for Life has made a decision on the request, the requester must be notified in the required form.

If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

Grounds for refusing a request

Scan for Life has the right to reject any request for information submitted in terms of Sections 62 to 70 of Chapter 4 of the PAIA Act.

11. AVAILABILITY OF THE MANUAL

This manual is available for inspection at the office of Scan for Life free of charge; from the SAHRC.

Signature of Designated Head of the Scan for Life

Dr Louis Sulman

Name of Designated Head of the Scan for Life

Date of signature 17/12/2015

Publication date of this manual: 17/12/2015

Next revision date of this document: 17/12/2016
12. FEES PAYABLE TO OBTAIN THE REQUESTED RECORDS OF INFORMATION.

The following is a breakdown of the fees structure for the purposes of determining the manner in which fees relating to a request for access to a record of Scan for Life are to be calculated:

Part III of Regulation 187 published in the Government Gazette on the 15 February 2002:

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:
   a. (a) For every photocopy of an A4-size page or part thereof R1,10
   b. (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form R0,75
   c. (c) For a copy in a computer-readable form on -(i) stiffy disc R 7,50; (ii) compact disc R 70,00
   d. (d) (i) For a transcription of visual images, for an A4-size page or part thereof R 40,00, (ii) For a copy of visual images R 60,00
   e. (e) (i) For a transcription of an audio record, for an A4-size page or part thereof R 20,00; (ii) For a copy of an audio record R 30,00
3. The request fee payable by a requester, other than a personal requester, referred to in Regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in Regulation 11(3) are as follows:
   1. a) For every photocopy of an A4-size page or part thereof R 1,10;
      b) For every printed copy of an A4-size page or part; thereof held on a computer or in electronic or machine-readable form R 0,75;
      c) For a copy in a computer-readable form on -(i) stiffy disc R 7,50; (ii) compact disc R 70,00
      d) (i) For a transcription of visual images, for an A4-size page or part thereof R 40,00, (ii) For a copy of visual images R 60,00
      e) (i) For a transcription of an audio record, for an A4-size page or part thereof R 20,00; (ii) For a copy of an audio record R 30,00
      f) To search for and prepare the record for disclosure, R30,00; for each hour or part of an hour reasonably required for such search and preparation.
2. For purposes of section 54(2) of the Act, the following applies:
   • (a) Six hours as the hours to be exceeded before a deposit is payable; and
   • (b) one third of the access fee is payable as a deposit by the requester.
3. The actual postage is payable when a copy of a record must be posted to a requester.
13. FORM C: REQUEST FOR ACCESS TO RECORD OF SCAN FOR LIFE

In terms of Section 53 (1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) [Regulation 10]

A. Particulars of Preventive Imaging trading as Scan for Life

Designated Head of Scan for Life: Dr Louis Sulman
Registration Number: 2012/125980/21
Practice number: 0161241
Postal Address of Scan for Life: P.O Box 61 Parklands 2121
Physical address of Scan for Life: The Netcare Rosebank Hospital - Ground floor 14 Sturdee Avenue Rosebank
Telephone number of Scan for Life: 011 447-5669 or 011 447-7669
Fax number of Scan for Life: 011 447-7928
E-Mail address of Scan for Life: info@scanforlife.co.za
Website address of Scan for Life: www.scanforlife.co.za
VAT Number: 4560220263
Person designated to act on behalf of the Designated head: Germaine Lavery
Contact details of person designated to act: germaine.lavery@radimaging.co.za

B. Particulars of person requesting access to the record

(a) The particulars of the person who requests access to the record must be given below.

(b) The address and/or fax number in the Republic to which the information is to be sent must be given.

(c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: ________________________________
Identity number: ________________________________
Postal address: ________________________________
Fax number: ________________________________
Telephone number: ________________________________
E-mail address: ________________________________
Capacity in which request is made, when made on behalf of another person: ________________________________

The Rosebank Hospital, 14 Sturdee Avenue, Rosebank, Johannesburg, South Africa • PO Box 61, Parklands, 2121, South Africa • Tel: +27 (0)11 447 5669/7669 or +27 (0)82 388 0929
Fax: +27 (0)11 447 7928 • email: info@scanforlife.co.za • www.scanforlife.co.za • Medical Directors: Dr Mitch Kaplan, Dr Louis Sulman • Practice Number 0161241
A. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: ________________________________

Identity number: _______________________________________

B. Particulars of record

(a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.

(b) If the provided space is inadequate, please continue on a separate folio

The requester must sign all the additional folios.

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

2. Reference number, if available: _________________________________________

3. Any further particulars of record: _________________________________________
C. Fees

(a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.

(b) You will be notified of the amount required to be paid as the request fee.

(c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.

(d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees: ____________________________________________

D. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability: ____________________________________________

Form in which record is required: ____________________________________________

NOTES:

(a) Compliance with your request in the specified form may depend on the form in which the record is available.

(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.

(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.
Mark the appropriate choice with an X.

1. If the record is in written or printed form:
   ○ copy of record
   ○ inspection of record

2. If record consists of visual images
   (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):
   ○ view the images copy of the images
   ○ transcription of the images

3. If record consists of recorded words or information which can be reproduced in sound:
   ○ listen to the soundtrack (audio file)
   ○ transcription of soundtrack (written or printed document)

4. If record is held on computer or in an electronic or machine-readable form:
   ○ printed copy of record
   ○ printed copy of information
   ○ derived from the record
   ○ copy in computer readable form
   ○ (stiffy or compact disc)

If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.

○ YES
○ NO

E. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

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

2. Explain why the record requested is required for the exercise or protection of the aforementioned right: __________________________

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15.
F. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at ________________ this ______ day of ____________________

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE