SENSKE ORTOPEDIE INC

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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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1 Definitions

Term	Definition
CEO	Chief Executive Officer
Client	Any natural or juristic person that received or receives services from the company
Complainant	Any person who lodges a complaint with the Information Regulator
Complaint	(a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator
Conditions for Lawful Processing	The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual
Data Subject	The person to whom Personal Information relates
Day	A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)
DIO	Deputy Information Officer
Information Officer/IO	The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA
Manual	This manual
Minister	Minister of Justice and Correctional Services
Office Hours	(a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate
PAIA	The Promotion of Access to Information Act, No. 2 of 2000
Personal Information	Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers
Personnel	Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors
POPI/POPIA	The Protection of Personal Information Act, No. 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI
Private Body	(a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body

Term	Definition
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction
Regulator	Information Regulator established in terms of POPIA
Republic	Republic of South Africa
Signature	Any legally accepted form of signature, including electronic signature where applicable
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2 Purpose of the PAIA Manual

This PAIA Manual is useful for the public to:

2.1 Check the categories of records held by a body 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 body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.

2.3 Know the description of the records of the body which are available in accordance with any other legislation.

2.4 Access all the relevant contact details of the IO and DIO who will assist the public with the records that 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 body 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 recipients or categories of recipients to whom the personal information may be supplied.

2.8 Know if the body has planned to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.

2.9 Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3 Key Contact Details for Access to Information of Senske Ortopedie Inc

3.1 Chief Information Officer

Name	HEINRICH EDUARD SENSKE
Contact number	012 548 1456
Email address	accounts@senske.co.za / hein@senske.co.za

3.2 Deputy Information Officer

NB: If more than one DIO is designated, please provide the details of every DIO of the body designated in terms of section 17 (1) of PAIA.

Name	ANTOINETTE VILJOEN
Contact number	012 548 1456
Email address	accounts@senske.co.za

3.3 General contacts for access to information

Email address	accounts@senske.co.za

3.4 National or head office

Postal address	PO BOX 768 MAGALIESKRUIN 0150
Physical address	SUITE 13 MONTANA PVT HOSPITAL
Contact number	012 548 1456
Email	accounts@senske.co.za
Website	www.senske.com

3.5 Subsidiaries and affiliates:

Company name	Senske inc
Company registration number	
Information Officer	
Email	
Contact number	

4 Guide on how to use PAIA and how to Obtain Access to the Guide

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised guide on how to use PAIA ("guide"), in an easily comprehensible form

and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The guide is available in each of the official languages and in braille.

4.3 The aforesaid guide contains the description of:

4.3.1 The objects of PAIA and POPIA;

4.3.2 The postal and street address, phone and fax number and, if available, email address of:

4.3.2.1 The IO of every public body, and

4.3.2.2 Every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA[1];

4.3.3 The manner and form of a request for:

4.3.3.1 Access to a record of a public body contemplated in section 11[2].

4.3.3.2 Access to a record of a private body contemplated in section 50[3].

4.3.3.3 An internal appeal.

4.3.3.4 A complaint to the Regulator.

4.3.3.5 An application with a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.

4.3.4 The provisions of sections 14[4] and 51[5] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.5 The provisions of sections 15[6] and 52[7] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.6 The notices issued in terms of sections 22[8] and 54[9] regarding fees to be paid in relation to requests for access;

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[1] Section 56(a) of POPIA - Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA

[2] Section 11 of PAIA – A requester must be given access to a record of a public body if the requester complies with all the procedural requirements in PAIA relating to a request for access to that record, and if access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

[3] Section 50 of PAIA – A requester must be given access to any record of a private body if:
(a) that record is required for the exercise or protection of any rights;
(b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
(c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

[4] Section 14 of PAIA – The Information Officer of a public body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

[5] Section 51 of PAIA – The Information Officer of a private body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

[6] Section 15 of PAIA – The Information Officer of a public body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

[7] Section 52 of PAIA – The head of a private body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

[8] Section 22 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

[9] Section 54 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

4.3.7 The regulations made in terms of section 92[10];
4.3.8 The assistance available from the IO of a public body in terms of PAIA and POPIA;
4.3.9 The assistance available from the Regulator in terms of PAIA and POPIA; and
4.3.10 All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging.

4.4 Members of the public can inspect or make copies of the guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The guide can also be obtained:
4.5.1 Upon request to the IO.
4.5.2 From the website of the Regulator (https://www.justice.gov.za/inforeg/).

4.6 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:
4.6.1 English.
4.6.2 Afrikaans.
4.6.3 Zulu.

5 Guide of Information Regulator

5.1 A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.

5.2 The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.

5.3 Should you wish to access the guide, you may request a copy from the IO by contacting him/her using the details specified above.

5.4 You may also inspect the guide at the company's offices during ordinary working hours.

5.5 You may also request a copy of the guide from the Information Regulator at the following details:

Postal address	P O Box 31533, Braamfontein, Johannesburg, 2017
Contact number	+27 (10) 023-5200
Website	www.inforegulator.org.za
Email	PAIACompliance.IR@justice.gov.za

6 Latest Notices in terms of Section 52(2) of PAIA

[10] *Section 92(11) of PAIA – The Information Regulator must update and publish the guide referred to in subsection (1) at intervals of not more than two years.*

At this stage, no notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

7 Availability of Certain Records in terms of PAIA

7.1 Categories of records of the Senske Ortopedie Inc which are available without a person having to request access:

NB: Please specify the categories of records held by the body which are available without a person having to request access by completing the table below, types of the records and how the records can be accessed. These are mostly records that may be available on the website and a person may download or request telephonically or by sending an email or a letter. Below is an example of the table that can be used.

Category of Records	Types of the Record	Available on Website	Available on Request
PAIA Manual	Company's current PAIA Manual	X	
Company overview	Company profile, business activities, contact details	X	
Policies (public-facing)	Privacy policy, website cookies policy	X	
Legal disclosures	Consumer protection notices, disclaimers, terms and conditions		X
News and announcements	Company newsletters, media releases, service updates		X
Public marketing materials	Brochures, product offerings, public service descriptions	X	
POPIA and PAIA awareness training certificates	Company's attendance registers on training of POPIA and PAIA		X
Public tender or supplier information (if applicable)	Supplier registration forms, B-BBEE (Broad-Based Black Economic Empowerment) certificate (public documents)		X
Contact information for IO	Name, designation, email address, contact number	X	

7.2 Description of the records/subjects of Senske Ortopedie Inc which are available in accordance with any other legislation:

NB: Please specify all the records which are created and available in accordance with any South African legislation. Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used in describing the records and applicable legislation.

Category of Records	Applicable Legislation	Department/ Subject Area
Memorandum of Incorporation, company registration documents, minutes of board meetings, share register	Companies Act, 71 of 2008	HR
Employment contracts, employee attendance records, payroll information, leave records	Basic Conditions of Employment Act, 75 of 1997	(HR)
Disciplinary records, grievance procedures, union agreements, Commission for Conciliation, Mediation and Arbitration (CCMA) documentation	Labour Relations Act, 66 of 1995	HR
Employment Equity (EE) plans, EE reports, committee meeting minutes	Employment Equity Act, 55 of 1998	HR
Tax returns, IRP5 certificates, Pay-As-You-Earn (PAYE) records, employee tax submissions	Income Tax Act, 58 of 1962	Auditors
Workplace Skills Plans (WSPs), annual training reports, learnership agreements	Skills Development Act, 97 of 1998	HR
Unemployment Insurance Fund (UIF) contribution records, declarations, employee benefit claim records	Unemployment Insurance Act, 63 of 2001	HR
Health and safety audits, incident reports, risk assessments, safety committee records	Occupational Health and Safety Act, 85 of 1993	HR
Value-Added Tax (VAT) returns, input/output tax records, SARS correspondence	Value-Added Tax Act, 89 of 1991	HR/Auditors
Workers Compensation Assistance (WCA) claims, injury-on-duty reports, compensation records	Compensation for Occupational Injuries and Diseases Act, 130 of 1993	HR
B-BBEE certificates, ownership and supplier development records	Broad-Based Black Economic Empowerment Act, 53 of 2003	HR
Client contracts, complaint records, marketing disclaimers, product/ service terms and conditions	Consumer Protection Act, 68 of 2008	HR
Data subject consent forms, privacy notices, PAIA Manual,	Protection of Personal Information Act, 4 of 2013	HR

Category of Records	Applicable Legislation	Department/ Subject Area
operator agreements, processing activity records		
PAIA Manual, access request logs, training records	Promotion of Access to Information Act, 2 of 2000	HR
Know Your Customer (KYC) documents, client identification and verification records	Financial Intelligence Centre Act, 38 of 2001 (if applicable)	HR
Electronic communications policies, e-signature consents, website terms and conditions	Electronic Communications and Transactions Act, 25 of 2002	HR/IT
Document retention and disposal schedules, archive logs	National Archives and Records Service Act, 43 of 1996	HR

Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

7.3 The company holds and/or processes the following records for the purposes of PAIA and POPIA:

7.3.1 PAIA: PAIA Manual; PAIA guides; PAIA records; PAIA submission records; awareness training.

7.3.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.

7.3.3 Further information which may be made available upon request.

7.4 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

8 Request Process

8.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.

8.2 The requester must complete Form 02 of PAIA Forms (Request for Access to Record) herein, is attached hereto and submit it to the IO at the details specified herein.

8.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.

8.4 The prescribed form must be completed with enough particularity to enable the IO to determine:
- 8.4.1 The record(s) requested;
- 8.4.2 The identity of the requestor;
- 8.4.3 What form of access is required; and
- 8.4.4 The postal address or fax number of the requestor.

8.5 The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.

8.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the IO that the request be dealt with sooner.

8.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held at another office of the company and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requestor in writing should an extension be necessary.

8.8 The IO must communicate a response to the request for access using Form 03 of PAIA Forms (Outcome of Request and of Fees Payable) herein. This communication shall inform the requestor of:
- 8.8.1 The decision; and
- 8.8.2 Fees payable.

8.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.

8.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the IO for assistance.

8.11 An oral request can be made to the IO should the requestor be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requestor and provide a copy of the form to the requestor.

8.12 Form 2 of POPIA Forms (Request for Correction or Deletion) herein, is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data.

8.13 Form 3 of POPIA Forms (Application for the Issue of a Code of Conduct) herein is used by an industry body, profession, or class of entities to apply for the issuance of a Code of

Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing.

8.14 Form 4 of POPIA Forms (Request for Consent – Direct Marketing) herein enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to.

8.15 Form 5 of POPIA Forms (Complaint Regarding Interference with Personal Information) herein allows a data subject or complainant to submit a complaint to the IR concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations.

9 Grounds for Refusal

The following are grounds upon which the company may, subject to the exceptions in chapter 4 of PAIA, refuse a request for access in accordance with chapter 4 of PAIA:

9.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.

9.2 Mandatory protection of the commercial information of a third party, if the records contain:
- 9.2.1 Trade secrets of that third party;
- 9.2.2 Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
- 9.2.3 Information disclosed in confidence by a third party to the company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.

9.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.

9.4 Mandatory protection of the safety of individuals and the protection of property.

9.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.

9.6 Protection of the commercial information of the company, which may include:
- 9.6.1 Trade secrets;
- 9.6.2 Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the company;
- 9.6.3 Information which, if disclosed, could put the company at a disadvantage in contractual or other negotiations or prejudice the company in commercial competition; and/or

9.6.4 Computer programs which are owned by the company, and which are protected by copyright and intellectual property laws.

9.7 Research information of the company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.

9.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10 Remedies Should a Request be Refused

10.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.

10.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

11 Fees

The following fees shall be payable upon request by a requestor:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Base/starting rate to search for and prepare the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first

Details	Fee
	hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Rate to search for and prepare the record for disclosure	R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)
Postage, email or any other electronic transfer	Actual expense, if any

12 Processing of Personal Information

12.1 Purpose of processing personal information:

12.1.1 To provide orthopaedic, prosthetic, rehabilitation, and related healthcare services to patients, including patient assessments, treatment planning, device fitting, adjustments, repairs, and follow-up care.

12.1.2 To maintain accurate patient medical records, clinical histories, treatment notes, measurements, prescriptions, and healthcare documentation required for ongoing patient care and continuity of treatment.

12.1.3 To communicate with patients, guardians, medical practitioners, hospitals, medical schemes, and other authorised healthcare professionals regarding appointments, treatment plans, authorisations, quotations, deliveries, and support services

12.1.4 To process medical aid claims, billing, quotations, payments, accounts, and financial transactions related to products and services rendered.

12.1.5 To comply with applicable laws, regulations, ethical obligations, healthcare industry standards, and reporting requirements, including obligations under POPIA, PAIA, tax legislation, healthcare regulations, and medical scheme requirements.

12.1.6 To manage employee administration, recruitment, payroll, performance management, training, occupational health and safety, and other employment-related obligations.

12.1.7 To manage relationships with suppliers, service providers, contractors, and business partners, including procurement, service delivery, and contractual management processes.

12.1.8 To maintain the security of company systems, facilities, patient information, and business operations through access control, monitoring, cybersecurity measures, and incident management procedures.

12.1.9 To conduct internal reporting, audits, quality assurance, risk management, compliance monitoring, and business improvement activities.

12.1.10 To conduct lawful marketing, awareness campaigns, newsletters, and client engagement activities where consent is obtained or another lawful justification applies.

12.1.11 To retain records and information for historical, statistical, research, insurance, warranty, and legal purposes where permitted or required by law.

12.1.12 To investigate and respond to complaints, incidents, disputes, legal proceedings, or data subject requests.

NB: Describe the purpose or reasons for processing personal information in your organisation.

12.2 Description of the categories of data subjects and of the information or categories of information relating thereto:

NB: Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed. Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services.

Categories of Data Subjects	Personal Information that may be Processed
Patients / Clients	Full names, ID/passport numbers, contact details, residential addresses, medical history, healthcare records, prescriptions, medical aid information, treatment plans, orthopaedic measurements, diagnostic information, payment information, and communication records.
Employees	Names, identity numbers, contact details, employment history, qualifications, payroll information, banking details, tax information, performance records, attendance records, disciplinary records, medical certificates, and emergency contact details.
Prospective Employees / Job Applicants	CVs, qualifications, employment history, identity numbers, references, criminal checks, background verification information, and interview notes.
Medical Practitioners / Referring Specialists	Names, practice details, professional registration numbers, contact information, referral information, and correspondence records.
Suppliers and Service Providers	Company registration details, contact information, banking details, tax information, contracts, invoices, and service records.
Medical Schemes / Insurers	Contact information, claim information, authorisation records, payment details, and related correspondence.
Website Users	Names, contact details, email addresses, IP addresses, cookies, online identifiers, website usage information, and enquiry submissions.
Information Officers / Deputy Information Officers	Names, identity numbers, contact information, designation records, registration details, and compliance-related documentation.
Shareholders / Directors / Members	Identity numbers, contact details, company records, financial interests, statutory records, and compliance documentation.

Training Participants	Attendance registers, training records, certificates, assessment results, and acknowledgment forms.

13 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

NB: Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be Supplied
Patient medical information, treatment records, and healthcare information	Authorised healthcare practitioners, specialists, hospitals, rehabilitation facilities, medical schemes, and healthcare service providers involved in patient care.
Medical aid and billing information	Medical schemes, insurers, payment processors, debt collection service providers, accountants, auditors, and financial institutions.
Employee information	Payroll administrators, pension/provident funds, medical aid providers, SARS, regulatory authorities, and employee benefit providers.
Supplier and contractor information	Financial institutions, auditors, legal advisors, procurement service providers, and regulatory authorities where required.
Information required for legal or regulatory compliance	Government departments, regulatory bodies, courts, law enforcement agencies, the Information Regulator, and other authorised public bodies.
Website user and electronic communication information	Website hosting providers, IT service providers, cybersecurity providers, cloud storage providers, and communication platform providers.
Information relating to training and compliance activities	Training providers, accreditation bodies, consultants, auditors, and compliance service providers.
Business and operational records	External auditors, legal advisors, consultants, insurers, and authorised third-party service providers.
Information Officer and compliance-related records	The Information Regulator, compliance consultants, legal advisors, and authorised internal management personnel.

14 Planned Transborder Flows of Personal Information

NB: Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside of the Republic. Please specify the country in which personal information will be stored and categories of personal information.

14.1 General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information:
- 14.1.1 Access controls (who in the organisation can see what)
- 14.1.2 Encryption of data in transit / at rest
- 14.1.3 Secure servers and backups
- 14.1.4 Audit logs / tracking of data access
- 14.1.5 Staff training on confidentiality and data protection
- 14.1.6 Physical security for non-electronic records

14.2 In addition, the following technical security safeguards have been implemented to support these-objectives:
- 14.2.1 Data encryption (at rest and in transit) to protect sensitive information from unauthorised access;
- 14.2.2 Anti-virus and anti-malware software to detect, prevent, and mitigate cyber threats;
- 14.2.3 Firewalls and intrusion detection/prevention systems (IDS/IPS) to monitor and safeguard network traffic;
- 14.2.4 Multi-factor authentication (MFA) and role-based access controls to limit access based on job function and business need;
- 14.2.5 Secure backup and disaster recovery solutions to ensure business continuity and data integrity;
- 14.2.6 Ongoing system monitoring and access logging to detect and respond to suspicious activity;
- 14.2.7 Physical security controls such as keycard access, secure storage, and visitor management procedures;
- 14.2.8 Employee training and awareness programmes to promote secure data handling and prevent human error;
- 14.2.9 Secure disposal of physical and electronic records when no longer needed or when required by law.
- 14.2.10 These safeguards are continuously reviewed and enhanced to address new risks, changing business processes, and advancements in technology.

Category of Personal Information	**Description of Transfer**
Cloud Storage and Backup Services	Personal information may be stored or backed up on secure cloud servers hosted by reputable service providers located outside South Africa (e.g. Microsoft Azure, Google Workspace, or similar platforms).
Email and Communication Systems	Information shared via corporate email, collaboration, or communication tools (e.g. Microsoft 365, Teams, or Zoom) may be routed through servers in foreign jurisdictions.

Specialised IT Support and System Maintenance	External IT service providers, including vendors or developers based outside South Africa, may remotely access systems for maintenance, troubleshooting, or upgrades under strict confidentiality and security controls.
International Suppliers and Manufacturers	Where products or services are sourced internationally, personal or company contact information may be shared with overseas partners, distributors, or logistics providers to facilitate delivery or service support.
Professional or Compliance Services	Where professional advisors or certification bodies are located abroad and require access to personal information to perform their services.

NB: Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include data encryption, anti-virus and anti-malware solutions.

15 Availability of the Manual

15.1 A copy of the manual is available:

15.1.1 On www.senske.co.za, or at any head office of Senske Ortopedie Inc for public inspection during normal business hours;

15.1.2 To any person upon request and upon the payment of a reasonable prescribed fee; and

15.1.3 To the Information Regulator upon request.

15.2 A fee for a copy of the manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

16 Objection to the Processing of Personal Information by a Data Subject

16.1 A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or section 11(3)(b) of the Act, must submit the objection to a responsible party at any time during office hours of a responsible party and free of charge.

16.2 A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to Form 3 herein, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11(3)(a) of the Act.

16.3 A responsible party must, when collecting personal information of a data subject, notify the data subject, in terms of section 18(1)(h)(iv) of the Act, of their right to object, as referred to in section 11(3) of the Act.

16.4 If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and upon request, be made available to the data subject in any manner, including the transcription thereof.

17 Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

17.1 A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.

17.2 A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

17.3 A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.

17.4 A request for correction to or deletion of personal information, as referred to in sub-regulation 12.11.2 or a request for the destruction or deletion of a record of personal information, as referred to in sub-regulation 12.11.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms herein free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.

17.5 A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which shall be free of charge.

17.6 A responsible party must, within 30 (thirty) days of receipt of the outcome of the request referred to in sub-regulation 12.11.2 or 12.11.3, notify a data subject, in writing, of the action taken as a result of the request

18 Updating of the Manual

The head of Senske Ortopedie Inc will update this manual on a regular basis.

Name of IO	ANTOINETTE VILJOEN
Title of the head of the body	e.g. Chief Executive Officer

APPLICABLE FORMS

PAIA Forms

Form 01: Request for a Copy of the Guide from an Information Officer [Regulation 3]
Form 02: Request for Access to Record [Regulation 7]
Form 03: Outcome of Request and of Fees Payable [Regulation 8]
Form 05: Complaint Form [Regulation 10]
Form 13: PAIA Request for Compliance Assessment Form [Regulation 14(1)]

POPIA Forms

Form 1: Objection to the Processing of Personal Information
Form 2: Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information
Form 3: Application for the Issue of a Code of Conduct
Form 4: Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing
Form 5: Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing