

# **REMEDI ACCESS TO INFORMATION MANUAL**

## Remedi Access to Information Manual

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") (as amended)

### Document approvals

This Manual was approved by:

| Name                                                           | Revision                                                               | Document version | Approval email and date        |
|----------------------------------------------------------------|------------------------------------------------------------------------|------------------|--------------------------------|
| Remedi Board of Trustees                                       | Adopted 24 June 2021                                                   | V1               | EXCO Meeting 27 May 2021       |
| Remedi Executive Committee                                     | Updated 23 March 2023                                                  | V2               | EXCO Meeting 23 March 2023     |
| Updates reviewed by Principal Officer                          | October 2024 Operations Meeting                                        | V3               | BOT Meeting review 21 Nov 2024 |
| Engagements and further reviews following BOT meeting Nov 2024 | Information Officer Discovery Health engagement with Principal Officer | V4               | For BOT review 27 Febr 2025    |

### Document reference

Please read this manual together with the following:

|    | Document name                                                                 | Location                                                                                                                                                                                          |
|----|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | Remedi Document Retention Policy                                              | Remedi Privacy Portal <ul style="list-style-type: none"> <li><a href="https://www.yourremedi.co.za/portal/rem/privacy">https://www.yourremedi.co.za/portal/rem/privacy</a></li> </ul>             |
| 2. | Remedi Privacy Statement                                                      | Remedi Privacy Portal <ul style="list-style-type: none"> <li><a href="https://www.yourremedi.co.za/portal/rem/privacy">https://www.yourremedi.co.za/portal/rem/privacy</a></li> </ul>             |
| 3. | PAIA Guidelines                                                               | Information Regulator of South Africa <ul style="list-style-type: none"> <li><a href="https://inforegulator.org.za/paia-guidelines/">https://inforegulator.org.za/paia-guidelines/</a></li> </ul> |
| 4. | The Promotion of Access to Information Act (Act 2 of 2000), as amended (PAIA) | Information Regulator of South Africa <ul style="list-style-type: none"> <li><a href="https://inforegulator.org.za/acts/">https://inforegulator.org.za/acts/</a></li> </ul>                       |
| 5. | Remedi Retention Policy of Member Data                                        | Remedi Privacy Portal <ul style="list-style-type: none"> <li><a href="https://www.yourremedi.co.za/portal/rem/privacy">https://www.yourremedi.co.za/portal/rem/privacy</a></li> </ul>             |

## Table of Contents

|                                                                                                                                                                     |    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| 1. List of acronyms and abbreviations.....                                                                                                                          | 4  |
| 2. Introduction.....                                                                                                                                                | 4  |
| 3. Access to the Manual.....                                                                                                                                        | 5  |
| 4. The purpose of the access to information manual .....                                                                                                            | 5  |
| 5. Key contact details of the Remedi Information Officer .....                                                                                                      | 6  |
| 6. Guide on how to use PAIA and how to obtain access to the guide .....                                                                                             | 6  |
| 7. Categories of records of Remedi which are available without a person having to request access .....                                                              | 7  |
| 8. Description of the records of Remedi which are available in terms of any other legislation ...                                                                   | 8  |
| 9. Description of the subjects on which Remedi holds records and categories of records held on each subject by Remedi .....                                         | 8  |
| 10. The purpose of processing personal information .....                                                                                                            | 9  |
| 11. Description of the categories of data subjects and of the relevant information or categories of information .....                                               | 10 |
| 12. The recipients or categories of recipients to whom personal information may be supplied.                                                                        | 11 |
| 13. Planned transborder flows of personal information.....                                                                                                          | 12 |
| 14. General description of information security measures to be implemented by Remedi to ensure the confidentiality, integrity and availability of information ..... | 13 |
| 15. Availability of this Manual .....                                                                                                                               | 13 |
| 16. Access procedure.....                                                                                                                                           | 13 |
| 17. Third-party notification.....                                                                                                                                   | 14 |
| 18. Grounds for refusal of access to records .....                                                                                                                  | 15 |
| 19. Refusal when the record cannot be found.....                                                                                                                    | 16 |
| 20. Remedies available when Remedi refuses a request for information .....                                                                                          | 16 |
| 21. Complaints to the Information Regulator .....                                                                                                                   | 16 |
| 22. Application to Court.....                                                                                                                                       | 16 |
| 23. Updating of the Manual.....                                                                                                                                     | 16 |
| 24. Prescribed Fees .....                                                                                                                                           | 16 |

## 1. List of acronyms and abbreviations

| Acronyms and Abbreviations | Description                                                                           |
|----------------------------|---------------------------------------------------------------------------------------|
| IO/Information Officer     | The Remedi Information Officer as appointed by the Remedi Board of Trustees           |
| Minister                   | Minister of Justice and Correctional Services                                         |
| PAIA                       | Promotion of Access to Information Act (Act 2 of 2000), as amended                    |
| POPIA                      | Protection of Personal Information Act (Act 4 of 2013)                                |
| Remedi                     | Remedi Medical Aid Scheme                                                             |
| Regulations                | Regulations relating to both PAIA and POPIA as published by the Information Regulator |
| Regulator                  | Information Regulator                                                                 |
| Republic                   | Republic of South Africa                                                              |

## 2. Introduction

- Your privacy is very important to us, and Remedi is committed to protecting your right to privacy as well as your right to access any information that Remedi has about you.
- The Access to Information Manual ('Manual') is prepared in compliance with the Promotion of Access to Information Act 2 of 2000 ('PAIA') and the Protection of Personal Information Act 4 of 2013 ('POPIA'). In terms of this legislation, everyone has the right to access their personal information that is processed by a private body, responsible party or appointed operator, such as Remedi. The purpose of the Manual is to enable requesters to get the records to which they are entitled in a quick, easy and accessible manner.
- This Manual applies to Remedi Medical Aid Scheme (Remedi), registration number 1430, registered with the Council for Medical Schemes.
- PAIA aims to give effect to the constitutional right of everyone in South Africa to access their information held by a public or a private body. This information can be accessed to exercise or protect any right contained in the Bill of Rights.
- When a request for access is made, Remedi is obliged to give it, except where the law expressly says that the information must not be released.
- It is important to note that PAIA recognise certain limitations to the right of access to information, which include:
  - The reasonable protection of the right to privacy
  - Commercial confidentiality
  - Effective, efficient and good governance

- The limitation must balance that right of access to information with any other rights.
- The main objective of POPIA is to promote the protection of personal information processed by public and private bodies. POPIA amended certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information.

### 3. Access to the Manual

- In line with the law, this Manual serves as Remedi's access to information manual and provides information on both the types and categories of records held by Remedi. This includes the following:
  - A description of the records held by and on behalf of Remedi
  - The procedure to be followed
  - Any fees payable when requesting access to any of these records
- A copy of the Manual is available:
  - On the Remedi website, free of charge; (<https://www.yourremedi.co.za/portal/rem/privacy>)
  - On request by any person and upon payment of a reasonable prescribed fee
  - From the designated Information Officer of Remedi; whose details are set out in paragraph 4 of this document.

### 4. The purpose of the access to information manual

- This Manual is useful for the public to:
  - Check which categories of records Remedi holds, without having to submit a formal PAIA request.
  - Understand how to make a request for access to a record of Remedi by providing a description of the subjects on which Remedi holds records and the categories of records held on each subject.
  - Know the description of the records of Remedi which are available in terms of any other legislation.
  - Access all the relevant contact details of the Remedi Information Officer (IO) who will assist the public with the records they intend to access.
  - Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.
  - Know if Remedi will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the relevant information or categories of information.
  - Know the description of the categories of data subjects and of the relevant information or categories of information.
  - Know the recipients or categories of recipients to whom the personal information may be supplied.
  - Know if Remedi has planned to transfer or process personal information outside the Republic and the recipients or

categories of recipients to whom the personal information may be supplied.

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

## 5. Key contact details of the Remedi Information Officer

- The responsibility for administration of any information requests lie with the Information Officer and all requests should be directed to the below contact details.

|                      |                                                                                        |
|----------------------|----------------------------------------------------------------------------------------|
| Information Officer: | Jaco Janse van Vuuren                                                                  |
| Postal address:      | PO Box 786722                                                                          |
|                      | Sandton                                                                                |
|                      | 2146                                                                                   |
| Registered Address:  | 1 Discovery Place Sandton 2146                                                         |
| Email address:       | <a href="mailto:executiveoffice@yourremedi.co.za">executiveoffice@yourremedi.co.za</a> |
| Website:             | <a href="http://www.yourremedi.co.za">www.yourremedi.co.za</a>                         |

## 6. Guide on how to use PAIA and how to obtain access to the guide

- The Information Regulator has, in terms of section 10 (1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (the 'Guide') easily, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- The Guide is available in English only.
- The Guide contains the following information:
  - o The objectives of PAIA and POPIA.
  - o How to request access to a record of a private body contemplated in section 50 of PAIA.
  - o The assistance available from the Regulator in terms of PAIA and POPIA.
  - o 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:
    - An internal appeal
    - A complaint to the Regulator
    - An application with a court against a decision by the information officer 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

- o The provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
  - o The provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
  - o The notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid for requests for access.
  - o The regulations made in terms of section 92 of PAIA.
- Members of the public can inspect or make copies of the Guide from the offices of the Scheme as per the registered rules, during normal working hours.
  - The Guide can also be obtained:
    - o Upon request to the Information Officer

## 7. Categories of records of Remedi which are available without a person having to request access

| Category of records | Types of the record                                                                              | Available online | Available upon request |
|---------------------|--------------------------------------------------------------------------------------------------|------------------|------------------------|
| Commercial records  | Remedi Brochures and benefit and product information flyers, application forms, tax certificates | X                | X                      |
| Governance records  | Annual financial statements as part of Remedi's annual disclosures and Registered Rules          | X                | X                      |
| Privacy/information | Access to information manual (PAIA Manual)                                                       | X                | X                      |
| Commercial records  | Newsletters                                                                                      | X                | X                      |

## 8. Description of the records of Remedi which are available in terms of any other legislation

- A requester may also request information that is available in terms of other legislation and may request access to related information outside this process. This includes the following categories of records and applicable legislation:

| Category of records | Types of the record                                                                       | Applicable Legislation (*)                             |
|---------------------|-------------------------------------------------------------------------------------------|--------------------------------------------------------|
| Regulatory          | Complaints and appeals                                                                    | Medical Schemes Act (Act 131 of 1998)                  |
| Commercial          | Complaints, transactional records, call recordings, client records, etc                   | Consumer Protection Act (Act 68 of 2008)               |
| Financial           | Records related to debt management and debt due to Remedi, customer due diligence reports | National Credit Act (Act 34 of 2005)                   |
| Privacy/information | Privacy statement                                                                         | Protection of Personal Information Act (Act 4 of 2013) |
| Governance          | Information relating to Annual General Meeting.                                           | Companies Act (Act 71 of 2008)                         |

\*The above is not an exhaustive list of legislation that may require Remedi to keep records.

## 9. Description of the subjects on which Remedi holds records and categories of records held on each subject by Remedi

| Subjects on which the body holds records | Categories of records (*)                                             |
|------------------------------------------|-----------------------------------------------------------------------|
| Governance                               | Governance, such as annual reports, minutes of Annual General Meeting |
| Client records                           | Commercial, such as client accounts, policies, statements             |
| Employee records                         | Employment files, such as qualifications, certifications, CVs         |
| Finance records                          | Finance, such as annual financial statements                          |
| Product and offerings                    | Commercial, such as brochures                                         |
| Statements                               | Commercial, such as claim statements                                  |

\*The above is not an exhaustive list of records that is kept by Remedi.

## 10. The purpose of processing personal information

- We process personal information and special personal information where applicable to:
  - Develop, monitor and improve our systems and processes.
  - Communicate with our clients, members, vendors, partners, service providers, etc.
  - Give permission to the contracted administrator, Discovery Health (Pty) Ltd, to manage products, benefits and services, which includes assessing and paying claims, determining and collecting contributions and providing any information, services or benefits that clients/members are entitled to.
  - Conduct underwriting and risk and fraud assessments.
  - May make decisions about applications using automated means and without human intervention in the decision-making process.
  - Resolve complaints or queries.
  - Improve our existing products and services and develop new products and services for Remedi members through research and development.
  - Improve customer experience and service efficiency by conducting surveys and analysing service interactions.
  - Fulfil legal or contractual obligations, including assisting with law enforcement, anti-money laundering and counterterrorist financing initiatives or complying with information requests by regulators and meeting our regulatory reporting obligations.
  - Comply with codes of conduct and industry agreements.
  - Make members aware of benefits that they are entitled to in relation to existing products.
  - Ensure that members get access to health treatments and other benefits when required and as stipulated by the benefit rules, as may be applicable, and help members to navigate the healthcare system or the services of any healthcare or other providers when relevant (To ensure this, we may share medical information with third parties, such as treating doctors, with consent, where required.)
  - Provide managed care services to members.
  - Support the early identification of medical conditions or other lifestyle risks and to encourage members to change their lifestyle to lessen the impact of these conditions.
  - Through cookies on the Remedi websites, authenticate members, provide security against the fraudulent use of login details and for the protection of the Remedi websites, personalise content and perform analytics to improve the digital experience.
- Trace or locate members, a beneficiary or dependent, if tracing becomes necessary for any reason relating to the administration and management of products or services provided by Remedi.

## 11. Description of the categories of data subjects and of the relevant information or categories of information

\* Below is a list of the categories of data subjects and a non-exhaustive list of personal information that Remedi may process.

| Categories of Data Subjects                                        | Personal Information that may be processed (*)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Client or member                                                   | Name, personal contact information (including in some instances residential address and phone number), email address, user id, title, gender, due diligence information, employer, complaints, communication preferences, geolocation data, user account details, benefit and service usage data, CCTV footage, health information, any other related personal information                                                                                                                                                                                                                                        |
| Employee/Trustee/Committee membership                              | Name, personal contact information, date of birth, email address, user id, job title, employment history, educational history, gender, nationality, salary and benefit details, images, date of hire, details of training undertaken, professional contact information (email address, business phone number, job title, division), travel and expenses data, record of app and website visits, IP address, cookie data, preferences, financial data, user account details, compliance investigatory data such as whistle-blower reports, editorial content, CCTV footage, any other related personal information |
| Juristic entities, including service providers, vendors, suppliers | Name, company/entity registration number, income tax and VAT registration details, BEE certificates, address, bank details, agreements, any other related individual data                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Categories of Data Subjects                       | Personal Information that may be processed (*)                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prospective client or member                      | Name, personal contact information (including in some instances residential address and phone number), email address, due diligence information, complaints, communication preferences, financial data, benefit and service usage data, any other related personal information                                                    |
| Prospective employee/trustee/committee membership | Name, personal contact information, date of birth, email address, job title, employment history, educational history, gender, nationality, salary and benefit details, images, professional contact information (email address, business phone number, job title, division), CCTV footage, any other related personal information |
| Visitors to premises                              | Name, personal contact information, email address, professional contact information (email address, business phone number, job title), vehicle registration information, CCTV footage, any other related personal information                                                                                                     |
| Website and app users                             | User id, record of website visits, clickstream data, IP address, cookie data, preferences                                                                                                                                                                                                                                         |

## 12. The recipients or categories of recipients to whom personal information may be supplied

| Category of personal information                                                              | Recipients or categories of recipients to whom their personal information may be supplied                                                                                                                              |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Commercial, financial, fraud or criminal records or as required to meet purpose specification | Regulatory bodies, statutory oversight bodies, regulators, data protection authorities, fraud prevention bodies, law enforcement, due diligence agencies, or judicial commissions of enquiry making a request for data |
| Commercial or financial records or as required to meet purpose specification                  | Any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data                                                                                                      |
| Commercial, financial or tax records or as required to meet purpose specification             | South African Revenue Service, or another similar authority                                                                                                                                                            |

| Category of personal information                                                                                                                     | Recipients or categories of recipients to whom their personal information may be supplied                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Personal information as required to meet purpose specification, e.g. name, surname, contact details, transactional information, call recordings, etc | Third parties with whom Remedi have a contractual relationship for the processing of data (for example, a third-party archiving service or payment provider, benefit partners, service providers and health professionals, who you have already consented to receiving personal information, as academics and researchers, including those outside South Africa. Remedi will ensure that the academics and researchers only use information that has been de-identified. |
| Commercial or financial records or as required to meet purpose specification                                                                         | Auditing and accounting bodies (internal and external)                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Personal information as requested, subject to the provisions of PAIA and POPIA                                                                       | Anyone making a successful application for access in terms of PAIA and POPIA                                                                                                                                                                                                                                                                                                                                                                                             |
| Commercial or financial records or as required to meet purpose specification                                                                         | Credit bureau or credit providers, industry association or other association for an industry sector in which Remedi operates                                                                                                                                                                                                                                                                                                                                             |
| Benefits usage, biographic information, account information, purchase information to meet purpose specification                                      | Other entities that use Remedi information where consent has already been given by the member to receive personal information                                                                                                                                                                                                                                                                                                                                            |

### 13. Planned transborder flows of personal information

- Remedi may transfer personal information outside South Africa to:
  - Communicate using an email address which you give us that is hosted outside South Africa
- Administer certain services, for example, cloud and IT services
  - Administer international treatment or benefits .
  - Where permission is already granted by the member to share their information.
- We will ensure that any authorised party that we pass personal information to for processing is subject to a binding agreement or is required by local data protection law or regulation to treat personal information with the same level of protection as we are obliged to.

#### **14. General description of information security measures to be implemented by Remedi to ensure the confidentiality, integrity and availability of information**

- Remedi ensures and monitors that extensive information security measures is in place to ensure the confidentiality, integrity and availability of personal information in its possession or under the control of its administrator, Discovery Health (Pty) Ltd, who takes appropriate technical and organisational measures designed to ensure that personal data remains protected and secure against unauthorised or unlawful processing or access and against accidental loss, destruction or damage.
- Personal information is stored on secured servers, personal computers and mobile devices and in secure manual record-keeping systems.
- A range of physical, electronic and other security measures have been deployed to protect the security, confidentiality and integrity of the personal information that we hold. Examples include the following:
  - Ensuring controlled access to information systems through identity and access management controls.
  - Employees of Remedi and our contracted service providers are bound by internal information security policies and must process information securely.
  - Regular review and monitoring of compliance with policies and industry best practice.

#### **15. Availability of this Manual**

- A copy of this Manual is available:
  - On our website at <https://www.yourremedi.co.za/portal/rem/privacy>
  - At the registered address as per the rules of the Scheme during normal business hours
  - To any person upon request and upon the payment of a reasonable prescribed fee
  - To the Information Regulator upon request.
- A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, must be paid for each A4-size photocopy made.

#### **16. Access procedure**

- Note: The request for access to information is processed centrally, on behalf of Remedi, by the Discovery Group Privacy Office (a shared services function within Discovery Central Services (Pty) Ltd) under the authority of Remedi. All requests to access to information are captured onto the Discovery Group's central privacy information management system for purposes of collection and communication to the requester in a secure manner.
- A requester requiring access to information held by Remedi must complete the Access Request Form or visit <https://www.yourremedi.co.za/portal/rem/privacy> to access the form. After completion, it must be submitted to the Information Officer at the postal address, physical address or email address provided. The requester must pay an access request fee (and a deposit, if applicable) unless that fee is waived by the Information Officer.

- The Access Request Form must contain sufficient details to enable the Information Officer to identify the following:
  - The records requested.
  - The proof of identity of the requester.
  - The form of access required if the request is granted.
  - The email address, postal address or fax number of the requester.
- If the request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request. This information must be to the reasonable satisfaction of the Information Officer and the requester must clearly disclose the right they wish to protect.
- If a person is unable to complete the prescribed form because of illiteracy or disability, they may make the request orally.
- The requester will be informed whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, the requester must state the manner and the particulars so required.
- A copy of the manual form (Form 2) can be downloaded from the Information Regulator's website at: <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

## 17. Third-party notification

- Remedi will take all reasonable steps to inform a third party to whom a requested record relates if the disclosure of that record would involve the disclosure of any of the following:
  - Personal information about that third party.
  - Trade secrets of that third party.
  - Financial, commercial, scientific or technical information (other than trade secrets) of that third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party.
  - Information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations.
  - Information about research being, or to be, carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research, to serious disadvantage.
- In addition, Remedi will take all reasonable steps to inform a third party to whom a requested record relates if the disclosure of that record would lead to any of the following:
  - Prejudice to that third party in commercial competition
  - An action for breach of a duty of confidence owed to a third party in terms of an agreement.
- Remedi will inform the third party as soon as reasonably possible, but in any event within 21 days after that request is received. Within 21 days of being informed of the request, the third party may do one of the following:

- Make written or oral representations to the Information Officer, explaining why the request for access should be refused.
- Give written consent for the disclosure of the record to the requester. Remedi will notify the third party of the outcome of the request. If the request is granted, adequate reasons for granting the request will be given.
- The third party may lodge a complaint to the Information Regulator or an application with a court against the decision within 30 days after notice is given.

## **18. Grounds for refusal of access to records**

- Remedi may refuse a request for information on the following basis:
  - Mandatory protection of the personal information, special personal information or privacy of a third party who is a natural person (including children), if supplying the information would involve the unlawful or unreasonable disclosure of personal information of that natural person
  - Mandatory protection of the commercial information of a third party, if the record contains:
    - Trade secrets or intellectual property of that third party
    - Financial, commercial, scientific or technical information, if the disclosure would likely cause harm to the financial or commercial interests of that third party
    - Information disclosed in confidence by a third party to Remedi if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
  - Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation.
  - Mandatory protection of the safety of individuals and the protection of property
  - Mandatory protection of records that would be regarded as privileged in legal proceedings.
  - Protection of the commercial information of Remedi, which may include:
    - Trade secrets of Remedi
    - Intellectual property of Remedi
    - Financial information that, if disclosed, could put Remedi at a disadvantage in negotiations or commercial competition.
    - A computer program, algorithm, actuarial modelling or application that is owned by Remedi and that is protected by copyright.
  - Protection of the research information of Remedi 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.
  - The request is clearly frivolous or involves an unreasonable diversion of resources.

## **19. Refusal when the record cannot be found**

- If all reasonable steps have been taken by Remedi to find the record requested by the requester and it cannot be found for reasons justifiable in terms of section 55 of PAIA, the Information Officer shall provide an affidavit or affirmation to the requester advising that it is not possible to give access to the record requested.
- If the record is found subsequently, Remedi undertakes to contact the requester to gain access to it, after the payment of the applicable access fee and subject to the provisions of this Manual.

## **20. Remedies available when Remedi refuses a request for information**

- The decision of the Information Officer is final and binding. Remedi does not have internal appeal procedures. Therefore, the decision made by the Information Officer is final. Requesters who are dissatisfied with a decision of the Information Officer may exercise external remedies at their disposal. All complaints by a requester or a third party can be made to the Information Regulator or a court, in the manner prescribed in paragraphs 21 and 22 below.

## **21. Complaints to the Information Regulator**

- The requester or third party may submit a complaint in writing to the Information Regulator, within 180 days of the decision to refuse a request for information, alleging that the decision was not in compliance with the provisions of the legislation. The Information Regulator will investigate the complaint and reach a decision, which may include a decision to investigate, to take no further action, to conciliate the matter or to refer the complaint to the Enforcement Committee. The Information Regulator may serve an enforcement notice confirming, amending or setting aside the impugned decision, which must be accompanied by reasons.

## **22. Application to Court**

- An application to court may be brought in the ordinary course. For this purpose, any reference to an application to court includes an application to a relevant magistrate's court.

## **23. Updating of the Manual**

- The Information Officer of Remedi will update this Manual on a regular basis.
- Issued by Mr Jaco Janse van Vuuren
- Principal Officer, Remedi Medical Aid Scheme

## **24. Prescribed Fees**

### **24.1. Payment of Fees**

- Payment details can be obtained from the Information Officer. Payment can be made by direct deposit into the nominated Remedi bank account. Proof of payment must be attached to the Access Request Form along with the other required documentation.

- The following fees are (or may be) payable:
  - Request fee
  - Access fee
  - Reproduction fee

#### 24.2. Request fee

- The requester must pay an initial request fee when submitting the Access Request Form. The prescribed fee is set out below.

#### 24.3. Access fee

- If the request for access is successful, an access fee must be paid prior to the release of the records by Remedi. This fee is for the search, reproduction and preparation of the record(s). The access fee will be calculated based on the prescribed fees set out below.

#### 24.4. Reproduction fee

- This fee applies to documents or records that are voluntarily disclosed. This is for reproduction, copying and transcribing the relevant documents or records. The reproduction fee will be calculated based on the prescribed fees set out below.

#### 24.5. Deposit

- If the search for, and the preparation of, the record for disclosure would, in the opinion of the
- Information Officer, require more than 6 hours, the requester may be required to pay as a deposit one third of the access fee (the fee which will be payable if the request is granted).
- If a deposit has been paid in respect of a request for access which is subsequently refused, then the Information Officer must refund the deposit in full to the requester.
- The requester must pay the prescribed fee before any processing, or any further processing, can take place.
- Remedi reserves the right to waive the fees payable subject to the type and categories of information requested as well as the effort required to provide access to the requested information. The requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request and access fees or deposit if Remedi declines the requester's request to waive the fees.
- Where Remedi receives a request for access to information held on a person other than the requester and the Information Officer, upon receipt of the request, is of the opinion that the preparation of the required record of disclosure will take more than 6 hours, a deposit is payable to the requester.
- The amount of the deposit is equal to one third of the amount of the applicable access fee.
- Please note: In terms of Regulation 8, value-added tax (VAT) must be added to all fees prescribed in terms of the Regulations. Therefore, the fees reflected below include VAT.

| REPRODUCTION FEES                                                                                                                                                                                                                                                                           |                                                                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Where Remedi has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access, the only charge that may be levied for obtaining these records will be a fee for reproduction of the record in question. |                                                                                      |
| Applicable fees for reproduction (including VAT)                                                                                                                                                                                                                                            | Amount in rand                                                                       |
| For every photocopy of an A4-size page or part thereof                                                                                                                                                                                                                                      | 2.00                                                                                 |
| For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine- readable form                                                                                                                                                                     | 2.00                                                                                 |
| For a copy in a computer-readable form on compact disc<br>Provided by the requester<br>Provided by Remedi                                                                                                                                                                                   | 40.00<br>60.00                                                                       |
| For a copy in a computer-readable form on a flash drive provided by the requester                                                                                                                                                                                                           | 40.00                                                                                |
| For a transcription of visual images for an A4-size page or part thereof                                                                                                                                                                                                                    | Service to be outsourced. Cost will depend on the quotation from a service provider. |
| For a copy of visual images                                                                                                                                                                                                                                                                 | Service to be outsourced. Cost will depend on the quotation from a service provider. |
| For a transcription of an audio record, for an A4-size page or part thereof                                                                                                                                                                                                                 | 24.00                                                                                |
| For a copy of an audio record on<br>Flash drive (to be provided by the requester)<br>Compact disc provided by the requester<br>Compact disc provided by Remedi                                                                                                                              | 40.00<br>40.00<br>60.00                                                              |
| REQUEST FEES                                                                                                                                                                                                                                                                                |                                                                                      |
| Request fee payable by every requester                                                                                                                                                                                                                                                      | 140.00                                                                               |
| ACCESS FEES                                                                                                                                                                                                                                                                                 |                                                                                      |
| An access fee is always payable where a request for access to information is granted, except where payment of an access fee is specially excluded in terms of the Act, or an exclusion is determined by the Minister in terms of section 54(8).                                             |                                                                                      |
| Applicable fees (including VAT)                                                                                                                                                                                                                                                             | Amount in Rand                                                                       |
| For every photocopy of an A4-size page or part thereof                                                                                                                                                                                                                                      | 2.00                                                                                 |
| For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine- readable form                                                                                                                                                                     | 2.00                                                                                 |

| Applicable fees for a copy in a computer-readable form (including VAT)                                                                   | Amount in Rand                                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Compact disc                                                                                                                             |                                                                                      |
| Provided by the requester                                                                                                                | 40.00                                                                                |
| Provided by Remedi                                                                                                                       | 60.00                                                                                |
| For a transcription of visual images for an A4-size page or part thereof                                                                 | Service to be outsourced. Cost will depend on the quotation from a service provider. |
| For a copy of visual images                                                                                                              | Service to be outsourced. Cost will depend on the quotation from a service provider. |
| For a transcription of an audio record, for an A4-size page or part thereof                                                              | 24.00                                                                                |
| For a copy of an audio record on                                                                                                         |                                                                                      |
| Compact disc provided by the requester                                                                                                   | 40.00                                                                                |
| Compact disc provided by Discovery                                                                                                       | 60.00                                                                                |
| Flash drive (to be provided by the requester)                                                                                            | 40.00                                                                                |
| To search for a record that must be disclosed (per hour or part of an hour reasonably required for the search, excluding the first hour) | 145.00                                                                               |
| To not exceed a total cost of                                                                                                            | 435.00                                                                               |
| Where a copy of a record needs to be posted the actual postal fee is payable.                                                            | TBC                                                                                  |