



## **Biocode Technologies (Pty) Ltd**

### **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. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	<b>“CEO”</b>	Chief Executive Officer
1.2	<b>“DIO”</b>	Deputy Information Officer;
1.3	<b>“IO”</b>	Information Officer;
1.4	<b>“Minister”</b>	Minister of Justice and Correctional Services;
1.5	<b>“PAIA”</b>	Promotion of Access to Information Act No. 2 of 2000( as Amended;
1.6	<b>“POPIA”</b>	Protection of Personal Information Act No.4 of 2013;
1.7	<b>“Regulator”</b>	Information Regulator; and
1.8	<b>“Republic”</b>	Republic of South Africa

## 2. PURPOSE OF 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 Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the 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 description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the 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 (BICODE TECHNOLOGIES (PTY) LTD)**

#### **3.1. Chief Information Officer**

Name:	Este Marie Burger
Tel:	+27 833745983
Email:	este@biocode.co.za
Fax number:	N/A

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Simone Turner  
Tel: +27 763962617  
Email: simone@biocode.co.za  
Fax Number: N/A

### 3.3 Access to information general contacts

Email: este@biocode.co.za

### 3.4 National or Head Office

Postal Address: LaunchLab  
Hammanhand Rd  
Stellenbosch Central  
7599

Physical Address: LaunchLab  
Hammanhand Rd  
Stellenbosch Central  
7599

Telephone: +27 833745983

Email: este@biocode.co.za

Website: <https://www.biocode.co.za/>

## 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, electronic mail address of-

4.3.2.1. the Information Officer of every public body, and

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;

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<sup>3</sup>; and

4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

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<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> 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.*

<sup>3</sup> Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

<sup>4</sup> Section 50(1) 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.*

- 4.3.6. 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-
  - 4.3.6.1. an internal appeal;
  - 4.3.6.2. a complaint to the Regulator; and
  - 4.3.6.3. 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;
- 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92<sup>11</sup>.

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-  
(a) any matter which is required or permitted by this Act to be prescribed;  
(b) any matter relating to the fees contemplated in sections 22 and 54;  
(c) any notice required by this Act;

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 Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available for public inspection during normal office hours

## 5. CATEGORIES OF RECORDS OF BIOCODE TECHNOLOGIES (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Available on Website	Available upon request
Privacy policy	X	X
Terms and conditions	X	X

## 6. DESCRIPTION OF THE RECORDS OF BIOCODE TECHNOLOGES (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

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(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and  
 (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”



**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY BIOCODE TECHNOLOGIES (PTY) LTD**

<b>Subjects on which the body holds records</b>	<b>Categories of records held</b>
Strategic Documents, Plans, Proposals	<ul style="list-style-type: none"> <li>-Annual Reports</li> <li>- Strategic Plans</li> <li>- Business Plans</li> <li>- Research and Development Proposals</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>- HR Policies</li> <li>- Advertised Posts and Recruitment Records</li> <li>- Employee Personnel Records</li> <li>- Employment Contracts</li> <li>- Leave Records</li> <li>- Payroll Records</li> </ul>
Finance and Procurement	<ul style="list-style-type: none"> <li>- Financial Statements</li> <li>- Budgets</li> <li>- Invoices and Receipts</li> <li>- Supplier Contracts and Records</li> </ul>
Legal and Governance	<ul style="list-style-type: none"> <li>- Incorporation Documents</li> <li>- Shareholder Records</li> <li>- Board and Committee Minutes</li> <li>- Legal Agreements and Contracts</li> <li>- Licences and Permits</li> <li>- Policies and Standard Operating Procedures</li> </ul>
Operations and Administration	<ul style="list-style-type: none"> <li>- Project Management Documents</li> <li>- Internal Correspondence</li> <li>- Client and Customer Records</li> </ul>
Research, Testing and Laboratory Records	<ul style="list-style-type: none"> <li>- Test Results and Reports</li> <li>- Laboratory Protocols</li> <li>- Quality Control Records</li> </ul>
Marketing and Communication	<ul style="list-style-type: none"> <li>- Marketing Materials</li> <li>- Social Media Content and Records</li> </ul>
Personal Information Held	<ul style="list-style-type: none"> <li>- Client Contact Information</li> <li>- Patient Records</li> <li>- Supplier and Service Provider Information</li> </ul>

	- Employee Personal Information
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*This list includes the main categories of records held by Biocode Technologies (Pty) Ltd but does not cover every document in our possession. We may also keep other records needed for our business operations, legal obligations, and compliance with relevant laws. All records are managed and retained in line with legal requirements and data protection laws.*

## **8. PROCESSING OF PERSONAL INFORMATION**

### **8.1 Purpose of Processing Personal Information**

Personal information is processed by Biocode Technologies (Pty) Ltd for purposes related to its business operations, including but not limited to processing blood samples for diagnostic testing, maintaining client and supplier records, complying with legal and regulatory obligations, managing employee and contractor relationships, and facilitating effective communication with clients, service providers, and stakeholders.

### **8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto**

<b>Categories of Data Subjects</b>	<b>Personal Information that may be processed</b>
Customers / Clients	name, identity numbers, contact information, date of birth, age, medical information
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	name, identity numbers, email address, bank details, qualifications

### **8.3 The recipients or categories of recipients to whom the personal information may be supplied**

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

#### 8.4 Planned transborder flows of personal information

Biocode utilises international software platforms such as JotForm and Airtable to store and manage test results and personal information, including names, ID numbers, and email addresses. These platforms are operated internationally, and the data is typically stored on servers located in the United States. Biocode is committed to ensuring that appropriate safeguards are in place to protect personal information and to remain compliant with applicable data protection laws, despite the transborder flow of information that may occur through the use of these platforms.

Due to the nature of the services and our business purposes, we may need to transfer and receive personal information to and from recipients in different countries and will always do so in compliance with POPIA. This may include if the user of our products or services is situated cross border. We will only transfer personal information to third parties in countries with adequate data protection laws or transfer it in terms of a written agreement with the recipient which imposes data protection requirements as required by POPIA.

#### 8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Access to personal information is restricted to authorised personnel only, and up-to-date anti-virus solutions are in place to prevent unauthorised access and protect against cyber threats. These safeguards are maintained to ensure the ongoing protection of personal information in compliance with applicable data protection legislation.

## **9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

9.1.1 on (<https://www.biocode.co.za/>)

9.1.2 head office of Biocode Technologies(Pty) Ltd for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 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.

## **10. UPDATING OF THE MANUAL**

The head of Biocode Technologies(Pty) Ltd will on a regular basis update this manual.

***Issued by***



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***Este Marie Burger***

***Chief Executive Officer***