



**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 (BIOCODE 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**

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](mailto:este@biocode.co.za)

### 3.4 National or Head Office

Postal Address: LaunchLab  
Hammanshand Rd  
Stellenbosch  
Central 7599

Physical Address: LaunchLab  
Hammanshand Rd  
Stellenbosch  
Central 7599

Telephone: +27 833745983

Email: [este@biocode.co.za](mailto: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 and section 56 of POPIA;
- 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; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50;
- 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;
- 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 and 51 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 and 52 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 and 54 regarding fees to be paid in relation to requests for access; and
  - 4.3.10. the regulations made in terms of section 92.
- 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/inforeg/>).
- 4.6 A copy of the Guide is also available for public inspection during normal office hours.

**5. CATEGORIES OF RECORDS OF BIOCOTECHNOLOGIES (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**

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

**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> <li>- Employee Personal Information</li> </ul>

*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

Categories of Data Subjects	Personal Information that may be processed
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. REQUEST FOR ACCESS TO RECORD/INFORMATION**

Data subjects requesting access to records and/or information pertaining to them and held by Biocode Technologies (Pty) Ltd shall be required to complete the annexed **Form 2: Request for Access to Record** and submit the same to the Chief Information Officer referred to in clause 3.1.

Such requests shall be limited strictly to information relating to the data subject concerned and shall not extend to any proprietary information of Biocode Technologies (Pty) Ltd. The Company reserves the right to refuse any such request where appropriate, provided that approval shall not be unreasonably withheld.

## **10. AVAILABILITY OF THE MANUAL**

10.1 A copy of the Manual is available-

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

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

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

10.1.4 to the Information Regulator upon request.

10.2 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.

## **11. 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***

# FORM 2

## REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer


(Address)

E-mail address:

Fax number:


Mark with an "X"

☐

Request is made in my own name  
person.

☐

Request is made on behalf of another

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			

Postal Address	
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Street Address	
----------------	--

E-mail Address	
----------------	--

Contact Numbers	Tel. (B)		Facsimile	
	Cellular			

<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>				
--	--	--	--	--

Description of record or relevant part of the record:	

Reference number, if available	
--------------------------------	--

Any further particulars of record	

<p><b>TYPE OF RECORD</b></p> <p><i>(Mark the applicable box with an "X")</i></p>
--

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	

Record is held on a computer or in an electronic, or machine-readable form	
--	--

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or	

protected	



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

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
**Signature of Information Officer**