

Periopp
Web site content
Promotion of Access to Information Act (PAIA)

1. Introduction and Purpose

This manual is prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) (as amended) and in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA). PAIA gives effect to the constitutional right of access to information held by the State or by any private party, to the extent that the information is needed for the exercise or protection of any rights. The purpose of this manual is to explain how individuals can request access to records held by Periopp (a private body) and to describe the types of records and personal data that Periopp processes. It is also intended to comply with the statutory requirement to describe Periopp's processing of personal information (POPIA), including categories of data subjects, information collected, recipients, and security measures. For example, in accordance with POPIA, this manual lists the purpose of processing (providing a digital healthcare platform), categories of data subjects and categories of information collected (see below), as well as information on any cross-border transfers and security measures. This manual will be updated regularly (see Section 10) to reflect any changes in Periopp's operations or in the law.

2. Company Contact Details

Periopp [Pty] Ltd (Registration No. 2023/750354/07) is a South African digital healthcare services company. Periopp's Information Officer and Deputy Information Officers are responsible for PAIA requests and POPIA compliance (names and contact details are placeholders here):

- **Information Officer:** Dr John J C Biggs (Founder) – Email: admin@periopp.co.za – Tel: Pending
- **Deputy Information Officers:**
 - Dr John J C Biggs, Dept. (Privacy Officer) – Email: admin@periopp.co.za – Tel: Pending

Postal/Physical Address: Periopp (Pty) Ltd, Dr JJC Biggs, Postnet suite 25, Private bag x12, Menlopark 0102, Pretoria, South Africa. Tel: Pending Queries or requests about access to records should be directed to the Information Officer at the above address or email.

3. The Act and Its Objectives

The Promotion of Access to Information Act (PAIA) aims to foster a transparent society by giving effect to the constitutional right of access to information. Its objectives include ensuring that any person can request and obtain information needed for exercising or protecting rights, subject to certain limitations. PAIA balances openness with privacy and confidentiality: it recognises the right to privacy and allows refusal of access where disclosure would harm personal privacy or legitimate business interests. In particular, PAIA (as amended) incorporates POPIA requirements for private bodies. Under POPIA, Periopp must protect personal information and inform data subjects about processing. Accordingly, this manual also describes Periopp's purposes for processing personal data, the categories of data subjects and personal information collected, the recipients of personal information, and any transborder flows, as required by Section 51(1)(c) of PAIA. In summary, the Act empowers individuals to request access to Periopp's records while outlining the procedures and grounds for lawful refusal.

4. Description of Available Records

Periopp holds records principally related to its Web site and mobile application services. These include, among others:

- **User Accounts and Profiles:** Records of user registration and profiles (names, contact details, identity numbers, authentication data).
- **Service Logs and Healthcare Data:** Records of services provided or booked through the platform (appointment dates/times, medical information submitted by users, case notes or health observations collected during service delivery).
- **Billing and Payment Records:** Invoices, receipts, payment method details (e.g. banking or card information), insurance claims and authorisations related to users' healthcare services.
- **Communications and Support Records:** Emails, chat transcripts, call logs, and messages between users and Periopp's customer support or healthcare personnel.
- **Technical and Web site Logs:** System logs, access logs, IP addresses, device identifiers, cookies and analytics data reflecting user interactions with the app/Web site.
- **Marketing and Administrative Records:** Marketing materials, newsletters, feedback/survey responses, and general correspondence with customers or service providers.

These records may exist in printed or digital form. Where applicable, some records may be held in terms of other legislation (for example, medical records may be regulated by healthcare laws). Periopp does not routinely hold employment, HR or supplier records in the scope of this manual unless specifically relevant.

For ease of reference, Periopp organises its records by subject (e.g. "Users", "Transactions", "Communications"). A detailed guide to the types of records and their filing systems is available from the Information Officer upon request. The public may inspect certain categories of records without a PAIA request if a notice to that effect has been published (e.g. any compulsory disclosures) but typically access requires a formal request.

5. Categories of Data Subjects and Personal Information Collected

Periopp processes personal information of various categories of individuals:

- **Registered Users/Patients:** Individuals who use the Periopp app/Web site to access healthcare services. Information collected includes identity data (name, surname, ID or passport number, date of birth), contact details (address, email, phone), account credentials, payment details, medical history or health data voluntarily provided, and communication logs. (Medical and health information is considered "special personal information" under POPIA and is handled with heightened privacy protections.)
- **Healthcare Providers/Practitioners (if applicable):** Doctors, nurses or other professionals who register on the platform. Information collected includes professional qualifications, registration numbers (e.g. with HPCSA), contact details, and records of consultations or service logs.
- **General Public/Visitors:** Members of the public who visit the Web site or use the app without registering. Collected information may include IP addresses, browser/device data, cookies, and any personal data submitted (e.g. contact inquiries).
- **Technical Support and Service Personnel:** Third-party IT or medical service providers who interact with Periopp (e.g. outsourced technicians). Data includes names, contact details, contractual agreements, and related correspondence.
- **Other Stakeholders:** Any other individuals who communicate with or provide information to Periopp, such as billing contacts or insurance representatives.

In general, personal data is limited to what is necessary for Periopp's services. Categories of information include identifiers (e.g. ID numbers), contact data, demographic data, contractual and transactional data, financial/payment data, medical and health data, and correspondence records. Periopp does not

collect sensitive personal data beyond what is necessary (e.g. health data only with consent and for treatment purposes). Where third-party personal information is processed, Periopp ensures to do so lawfully (for example, by obtaining consent or ensuring compatibility with users' rights).

6. Request Procedure

Any person ("requester") may request access to records of Periopp by following these steps:

1. **Complete the Prescribed Form:** The requester must submit a written request using the official PAIA request form (Form 2 for private bodies, available from the Information Regulator). The request must be made on the prescribed form or contain the same information, including – as required by Section 53 of PAIA – sufficient particulars to identify the record(s) sought and the requester.
2. **Provide Identity and Authority:** The request must include proof of the requester's identity (e.g. certified copy of ID or passport) and contact details (postal address, email, telephone). If acting on behalf of another person or entity, the requester must provide proof of authority (e.g. power of attorney or company registration). (This is required under POPIA and PAIA to establish the requester's right to the information.)
3. **Specify Access Requirements:** The requester should indicate the form of access desired (inspection, copy, electronic copy, etc.) and the postal address or email to which the response should be sent. If applicable, the requester must identify which right they seek to exercise or protect and explain why the information is required for that purpose (for example, a right to informed consent or legal entitlement).
4. **Submit the Request:** The completed form, proof of identity/authority, and any other requested documents should be delivered to the Information Officer of Periopp at the physical address or email provided above. The request and supporting documents may be sent by email, post, or fax. Incomplete or unsigned requests will not be processed.
5. **Pay Required Fees:** Before the request is further processed, the requester must pay the prescribed request fee (currently R140). Payment details will be provided in advance. No work will commence on the request until the request fee is received.

Upon receipt of a valid request and payment, Periopp's Information Officer will locate the requested records. The Act requires that Periopp decide on the request and notify the requester in writing within 30 days of receipt (or after receiving any missing particulars). The decision notice will grant or refuse access. If access is granted, it will state the form and fee (if any) for providing the records. If access is refused, the notice will give the reasons and the relevant legal provisions.

Example Request Steps:

- Download or obtain Form 2 (PAIA request form).
- Fill in all required fields, including description of records.
- Attach certified ID copy and pay R140.00 request fee.
- Submit to Information Officer via email or registered mail.

7. Fees Structure

PAIA provides for two types of fees: a request fee and an access fee. The current fees for private bodies (per PAIA Regulations) are:

Fee Type	Amount (ZAR)
Request fee (per request)	R140.00

Fee Type	Amount (ZAR)
Photocopy (black & white, A4)	R2.00 per page
Printed copy (A4)	R2.00 per page
Electronic copy (flash drive)	R40.00 (if requester provides the flash drive)
Electronic copy (CD)	R40.00 (if requester provides CD); R60.00 (if Periopp provides CD)
Transcription of visual images	Charge depends on outsourcing (varies by provider)
Transcription of audio (per A4 page)	R24.00
Audio copy (flash drive)	R40.00 (if requester provides drive)
Audio copy (CD)	R40.00 (if requester provides CD); R60.00 (Periopp provides CD)
Search & preparation (per hour, beyond first hour)	R145.00
Deposit (if applicable)	Up to one-third of estimated access fee (if search/preparation exceeds 6 hours)
Postage or electronic transfer	Actual cost incurred

All fees are exclusive of VAT (if applicable). The requester will be invoiced for the access fee (covering reproduction and search time) once the request is granted. If a request requires extensive search or preparation (more than 6 hours of work), the Information Officer may demand a deposit (not exceeding one-third of the total fee) before continuing. If access is refused, any deposit already paid will be refunded. These fee amounts are set by regulation and may be adjusted periodically.

8. Grounds for Refusal of Access

PAIA Chapter 4 lists specific grounds on which a request may be refused. In general, Periopp will refuse access if disclosure of the record would cause harm or violate another person's rights. Key refusal grounds include:

- **Protection of Privacy:** Mandatory refusal if the record contains personal information of a third party and disclosure would result in an unreasonable invasion of privacy. For example, medical or financial details about another person would be withheld unless that person consents or it is otherwise lawful.
- **Commercial/Confidential Information:** Mandatory refusal if the record contains trade secrets, or commercial, financial or technical information of a third party (or of Periopp itself) that could harm a party's interests. Disclosure that would put a third party or Periopp at a competitive disadvantage or breach confidence cannot be made public.
- **Other Confidential or Privileged Records:** Records subject to legal privilege (e.g. lawyer-client communications) or sworn confidentiality (e.g. records in bail applications) are protected by law and must be refused. Periopp will also refuse any record whose disclosure would breach a contractual confidentiality duty to a third party.
- **Safety and Security:** If disclosure could endanger the life or physical safety of any individual, or compromise security of property (e.g. building or computer system) or public safety measures, access will be refused.
- **Health and Well-being:** Special provisions apply to health records. If releasing health-related information could seriously harm an individual's physical or mental health or well-being, Periopp

will consult a relevant healthcare practitioner before disclosure, and access may be denied or conditioned.

- **Frivolous or Vexatious Requests:** Requests that are manifestly frivolous, vexatious, or that require unreasonable diversion of resources may be refused.
- **Other Laws:** If another law prohibits disclosure of certain information (for example, patient confidentiality under health laws), Periopp must refuse.

Even where a ground for refusal exists, Periopp will strive to provide access to any segregable portion of the record that can reasonably be disclosed. Section 70 of PAIA allows disclosure in the public interest even if a refusal ground applies, if the public benefit outweighs harm.

9. Remedies

If a request is refused or not dealt with, the requester has remedies under PAIA and POPIA. For PAIA:

- **Court Application:** A requester may apply to a court (High Court) for relief against Periopp's decision. An application must be lodged within 180 days of the decision/notice. The court may order release of the record or set aside the decision if it deems it just and equitable. In any PAIA appeal, Periopp must prove that the refusal complies with PAIA's provisions.
- **Internal Appeal:** (For private bodies, PAIA does not provide an internal appeal process; instead, appeals go directly to court as above.)
- **Information Regulator:** Under POPIA (the privacy law), any individual may lodge a complaint with the Information Regulator if they believe their personal information has been mishandled or their access rights under PAIA/POPIA have been infringed. The Regulator can investigate and take enforcement action as needed.

All notices of decision (grant or refusal) will inform the requester of these remedies, including time limits and procedures for appeal or court action. Periopp will cooperate with the Information Regulator and courts in any dispute over access.

10. Updating the Manual

Per Section 51(2) of PAIA, Periopp's Information Officer will review and update this manual regularly (at least annually or as required by law) to reflect any changes in records, staff, or legal requirements. The current version of the manual will be made publicly available: it will be posted on Periopp's Web site and kept at our head office for inspection during business hours. Copies will also be provided to anyone who requests it (for a nominal fee) and to the Information Regulator upon request. Any updated version will be dated and distributed in the same manner. The latest version of this manual should be consulted when making an access request.