

PAIA MANUAL

4FR HEALTH (PTY) LTD

*Prepared in terms of Section 51 of the
Promotion of Access to Information Act 2 of 2000 (“PAIA”)
and in support of compliance with the
Protection of Personal Information Act 4 of 2013 (“POPIA”)*

Document Owner: Information Officer
Approved By: Directors of 4FR Health (Pty) Ltd
Effective Date: 01 April 2026
Review Date: 01 April 2027
Document Version: 1.0

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1. Introduction

4FR Health (Pty) Ltd (“the Practice”) is a private medical practice operating in South Africa, providing comprehensive primary healthcare services.

The Practice operates in accordance with:

- The Health Professions Act 56 of 1974
- The National Health Act 61 of 2003
- Ethical rules of the Health Professions Council of South Africa (“HPCSA”)

All healthcare services are rendered by qualified practitioners registered with the HPCSA. The Practice is committed to maintaining the confidentiality and integrity of patient information.

2. Purpose of this PAIA Manual

This Manual is prepared in terms of:

- Promotion of Access to Information Act 2 of 2000 (“PAIA”)
- Protection of Personal Information Act 4 of 2013 (“POPIA”)

The purpose of this Manual is to:

- Describe the records held by the Practice;
- Outline how access may be requested;
- Explain how personal information is processed; and
- Provide Information Officer contact details.

3. Company Information

<i>Item:</i>	<i>Details:</i>
Company Name	4FR Health (Pty) Ltd
Registration Number	2022/247020/07
Physical Address	31 De Grendel Road, Parow North, Cape Town, 7500
Email	hello@4fr.co.za
Telephone	+27 21 023 0939
Website	https://4fr.co.za

4. Directors of the Company

Dr Colette Adams-Julius

- Director and General Practitioner
- HPCSA Independent Medical Practitioner: MP0755907
- BHF / PCNS Practice Number: 0768103
- Dispensing Licence: WC04179D-0

Gavin H. Julius

- Director and Business Manager
- Information and Compliance officer

5. Information Officer

In terms of POPIA and PAIA, the appointed Information Officer is:

<i>Role:</i>	<i>Details:</i>
Information Officer	Gavin Henry Julius
Information Regulator Registration Number	2026-005348
Appointment Date	25 January 2022
Registration Date	01 April 2026
Email	compliance@4fr.co.za
WhatsApp	+27 73 338 9938

The Information Officer registration is confirmed by certificate issued by the Information Regulator dated 01 April 2026.

6. Guide of the Information Regulator

The official PAIA Guide is available from the Information Regulator:

- Website: <https://inforegulator.org.za>
- Email: enquiries@inforegulator.org.za
- Physical Address:
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Postal Address:
P.O. Box 31533, Braamfontein, Johannesburg, 2017

7. Records Held by 4FR Health

<i>Subject</i>	<i>Categories of Records</i>
Company Records	Registration documents, compliance policies
Financial Records	Billing, invoices, payment records
Patient Records	Medical records, consultation notes, forms
Human Resources	Employment contracts, staff records
Operational Records	Supplier agreements, admin records

8. Records in Terms of Applicable Legislation

<i>Legislation</i>	<i>Records</i>
Health Professions Act 56 of 1974	Practitioner registration
National Health Act 61 of 2003	Patient medical records
POPIA Act 4 of 2013	Data protection policies
PAIA Act 2 of 2000	PAIA Manual and request records
Income Tax and VAT Acts	Financial records
Labour Legislation	Employment records
Medicines and Related Substances Act	Medication records
Occupational Health and Safety Act	Safety records

9. Records Automatically Available

The following are available without formal request:

- Website: <https://4fr.co.za>
- Practice information
- Contact details

Hosted PAIA Resources:

- PAIA Manual: <https://4fr.co.za/paia/paia-manual.pdf>
- PAIA Request Form: <https://4fr.co.za/paia/paia-request-form.pdf>
- PAIA Outcome Form: <https://4fr.co.za/paia/paia-outcome-form.pdf>

Patients may request access to their own records subject to:

- Identity verification
- Legal requirements
- Consent where applicable

10. Purpose of Processing Personal Information

Personal information is processed for:

- Patient care and treatment;
- Medical record keeping;
- Billing and accounts administration;
- Communication;
- Legal compliance;
- Employment administration;
- Reporting obligations.

11. Data Subjects and Personal Information

11.1 Patients

Type	Description
Personal	Name, ID, contact details
Medical	History, diagnosis, treatment
Financial	Billing details

Recipients may include:

- Medical schemes
- Hospitals
- Laboratories
- Referring practitioners

11.2 Employees and Practitioners

Type	Description
Personal	Name, ID, contact details
Employment	Contracts, qualifications
Financial	Salary and tax

11.3 Suppliers

Type	Description
Business	Agreements, company details

Financial	Invoices and payments
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12. Cross-Border Transfers

The Practice does not routinely transfer personal information outside South Africa.

If required:

- POPIA compliance will be ensured
- Consent obtained where necessary.

13. Security Measures

The Practice implements:

- Access control systems;
- Secure storage (physical and digital);
- Confidentiality agreements;
- Regular data protection reviews.

Only authorised personnel may access personal data.

14. Access to Records Procedure

To request access:

14.1 Complete Form 2 (Request for Access to Record);

14.2 Submit to:

- compliance@4fr.co.za
- WhatsApp: +27 73 338 9938

14.3 Provide:

- Proof of identity;
- Description of record;
- Reason for request.

15. Outcome of Request

The requester will be notified using Form 3, indicating:

- Approval or denial;
- Fees payable;
- Method of delivery.

16. Fees

Fees are determined in accordance with PAIA regulations and may include:

- Request fees;
- Copying fees;
- Search/preparation fees.

17. Availability of this Manual

This Manual is available:

- Online: <https://4fr.co.za/paia/paia-manual.pdf>
- At the Practice upon request
- From the Information Officer

18. ANNEXURE A

POPIA COMPLIANCE CHECKLIST AND INFORMATION PROCESSING FRAMEWORK

18.1 Purpose of this Annexure

This Annexure serves as an internal and public-facing summary of the measures implemented by 4FR Health (Pty) Ltd to promote compliance with POPIA.

18.2 Information Officer Oversight

<i>Requirement</i>	<i>Status / Implementation</i>
Information Officer Appointed	Yes
Registered with Information Regulator	Yes
Contact Maintained Publicly	Yes
Compliance Channels Active	Yes

18.3 Categories of Personal Information Processed

<i>Category</i>	<i>Examples</i>
Patient Identification Data	Names, ID numbers, DOB, contact details
Medical Information	History, diagnosis, prescriptions
Financial Information	Billing, medical aid, payments
Employment Information	Contracts, payroll
Supplier Information	Agreements, invoices
Website/User Data	Form submissions, enquiries

18.4 Purpose of Processing

- Medical treatment
- Patient record maintenance
- Billing and claims
- Compliance obligations
- Employment administration

18.5 Lawful Basis for Processing

<i>Basis</i>	<i>Application</i>
Consent	Where required
Contractual Necessity	Healthcare/service provision
Legal Obligation	Statutory compliance
Legitimate Interest	Administration
Vital Interest	Emergency care

18.6 Data Subject Rights Management

Patients/data subjects may:

- Request access
- Request corrections
- Object where applicable
- Lodge complaints

18.7 Security Safeguards

<i>Measure</i>	<i>Implementation</i>
Physical Security	Restricted file access
Digital Security	Password-protected systems
Role-Based Permissions	Authorised staff only
Backup Procedures	Routine backups
Confidentiality Agreements	Staff/contractor obligations

18.8 Third-Party Operators

Third-party providers may include:

- IT support
- Hosting providers
- Billing systems
- Laboratories

All are subject to confidentiality/POPIA safeguards.

18.9 Retention and Destruction

<i>Record Type</i>	<i>Minimum Retention</i>
Adult Medical Records	6 years
Minor Records	Until age 21
Financial Records	5 years
Employment Records	Per legislation

18.10 Cross-Border Transfers

No intentional routine transfers outside South Africa unless legally/permissibly required.

18.11 Security Breach Procedure

In the event of a breach:

- Immediate investigation
- Mitigation
- Review
- Notification where legally required

18.12 Staff Awareness

Staff are made aware of:

- Confidentiality obligations
- Restricted access principles
- Internal disciplinary measures for misuse

18.13 Supporting Documents Maintained

- PAIA Manual

- Privacy Policy
- Terms of Service
- Internal Procedures
- Incident Response Procedure

18.14 Continuous Review

This Annexure may be amended periodically to maintain ongoing compliance.