MOLECULAR DIAGNOSTIC SERVICES (PTY) LTD

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act, No. 2 of 2000, as amended.

Version 3.0
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1. DEFINITIONS

Term	Definition
MDS	Molecular Diagnostic Services
CEO	Chief Executive Officer
Director	MDS Director
Client	Any natural or juristic person that received or receives services from the company
Complainant	Any person who lodges a complaint with the Information Regulator
Complaint	(a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator

Term	Definition
Conditions for Lawful Processing	The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual
Data Subject	The person to whom Personal Information relates
Day	A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)
DIO	Deputy Information Officer
Information Officer/IO	The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA
Manual	This manual
Minister	Minister of Justice and Correctional Services
Office Hours	(a) For the Information Regulator: 08:00–17:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate
PAIA	The Promotion of Access to Information Act, No. 2 of 2000
Personal Information	Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers
Personnel	Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors
POPI/POPIA	The Protection of Personal Information Act, No. 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI
Private Body	(a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction
Regulator	Information Regulator established in terms of POPIA
Republic	Republic of South Africa
Signature	Any legally accepted form of signature, including electronic signature where applicable
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2. PURPOSE OF THE PAIA MANUAL

This PAIA Manual is useful for the public to:

2.1. The PAIA Manual serves as a public guide to the information held by the organisation and how it can be accessed. It outlines the categories of records available without a formal request, the subjects on which records are maintained, and details of records accessible under other legislation. The manual also provides the official contact details of the Information Officer (IO) and Deputy

Information Officer (DIO), who are responsible for assisting the public in exercising their right of access.

2.2. The manual further explains how to use the PAIA process and where to obtain the official guide published by the Regulator. It describes whether and how the organisation processes personal information, including the purposes of processing, the categories of data subjects involved, and the recipients (local or international) to whom such information may be supplied. The manual further confirms that appropriate security safeguards are in place to protect the confidentiality, integrity, and availability of personal information.

3. CONTACT DETAILS FOR ACCESS TO INFORMATION REQUESTS

3.1. Information Officer

Name	Denis Francis York
Contact number	031 267 7000
Email address	dryork@mdsafrica.net

3.2. Deputy Information Officer

Name	Chantel Harper
Contact number	031 267 7000
Email address	chantel@mdsafrica.net

3.3. National or Head Office

Postal address	Private Bag X20 Westville 3630
Physical address	6 Ribston Place Westville 3629
Contact number	031 267 7000
Email	reception@mdsafrica.net
Website	https://www.mdsafrica.net/

4. GUIDE ON HOW TO USE PAIA AND OBTAIN ACCESS TO THE GUIDE

4.1. The Information Regulator has published a revised PAIA Guide in terms of section 10(1) of PAIA (as amended). This guide is designed to help any person who wishes to exercise rights under PAIA or POPIA, and it is available in all official languages as well as in braille to ensure accessibility.

4.2. The Guide serves two key purposes:

4.2.1. Access to Personal Information (POPIA): It explains how individuals (data subjects) can exercise their rights to request confirmation of whether personal information is held about them, to access that information (including details of third-party recipients), and to request correction, deletion, or destruction of personal information that is inaccurate, outdated, excessive, or unlawfully obtained.

4.2.2. Access to Records (PAIA): It provides step-by-step guidance on how to request records from public or private bodies, including the required forms, the process for appeals or complaints, and how to approach a court if necessary.

4.3. In addition, the Guide offers:

4.3.1. An overview of the objectives of PAIA and POPIA.

4.3.2. Contact details of Information Officers (IOs) and Deputy Information Officers (DIOs). [1]

4.3.3. Manner and form of a request for access to a record of a public body and private body.[2]

4.3.4. Guidance on compiling or accessing PAIA Manuals.[3]

4.3.5. Information on voluntary disclosures of records, prescribed access fees, and applicable regulations.[4]

4.3.5.1. How to lodge an internal appeal, a complaint with the Regulator or apply to court against a decision by the IO 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.

4.3.6. Insight into how PAIA has been amended following the implementation of POPIA.

4.4. The guide can also be obtained:

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[1] *Section 56(a) of POPIA - Every public and private body must, in line with section 17 of PAIA, appoint as many Deputy Information Officers as needed to carry out the duties and responsibilities set out in section 55(1) of POPIA.*

[2] *In terms of PAIA, access to records of a public body (section 11) or a private body (section 50) must be granted if the requester meets PAIA's procedural requirements, the request is necessary for exercising or protecting a right (in the case of private bodies), and no grounds for refusal in Chapter 4 apply.*

[3] *In terms of sections 14 and 51 of PAIA, the Information Officer of every public and private body must update and publish their PAIA manual at least once every 12 months.*

[4] *In terms of PAIA, public and private bodies must keep their PAIA manuals (sections 14 and 51) and notices (sections 15 and 52) updated and published at least once every 12 months. When access to a record is granted, the notice must also state any access fee payable by the requester (sections 22 and 54). In addition, the Information Regulator must update and publish the official PAIA Guide at least once every two years (section 92(11)).*

4.4.1. Upon request to the IO: Request

4.4.2. From the website of the Regulator: www.inforegulator.org.za

4.4.3. From the offices of the Regulator: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg OR by email: enquiries@inforegulator.org.za

4.5. A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:

- English
- Afrikaans
- Zulu

5. LATEST NOTICES IN TERMS OF SECTION 52 (2) OF PAIA

At this stage, no notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

6. AVAILABILITY OF CERTAIN RECORDS IN TERMS OF PAIA

6.1. Categories of records of the Company that are available without a request, and those that require a formal request for access:

Category of Records	Types of the Record	Available on Website	Available on Request
PAIA Manual	Current PAIA Manual, version and effective date	X	X
Company overview	Company profile, history and ownership, specialist molecular diagnostic focus, SANAS accreditation details, physical and postal addresses, primary contact details	X	X
Services and diagnostic capabilities	Overview of human, veterinary, paternity and relationship, women's health, genetic and wellness testing services, including high level description of test panels and reference to standard request forms	X	X
Sector credentials and accreditation	SANAS accreditation reference numbers ISO 17025 and ISO 15189	-	X
Policies public facing	Privacy Policy, Cookies Notice, PAIA Manual, PAIA Guides in English and isiZulu	X	X
Legal disclosures	POPIA and PAIA statements, consent and information notices relevant to diagnostic testing, website and report disclaimers, limitation of liability wording in test request forms and result reports.	-	X

Category of Records	Types of the Record	Available on Website	Available on Request
Public marketing and educational materials	Brochures, information describing testing services and laboratory capabilities without patient, client, veterinarian, doctor, or practice identifiers	X	X
Test request and result process descriptions	High level description of how samples are submitted, received, processed and reported, including reference to turnaround times and result delivery channels, without patient or client identifiers	–	X
Tender or supplier onboarding information	Generic vendor forms, bank confirmation letter where appropriate	-	X
Corporate identifiers	Registered name, registration number, registered address, VAT number, SANAS facility reference numbers where applicable	-	X
Information Officer contacts	Information Officer and any Deputy Information Officer names, roles, email addresses, and contact numbers	X	X
Training attestations aggregated	Aggregated statistics for POPIA and PAIA awareness training, HSE induction completion rates, internal data protection training completion, without any personal information	-	X
Health, safety and quality statements	Health and safety policy for laboratory and sample collection environments, PPE requirements, biohazard and infection control statements, quality management summary	-	X
Data and reporting descriptions	High level data flow descriptions for diagnostic reporting, categories of operational and test data, storage locations and retention brackets without patient, client, or referral data	-	X
Whistleblowing and complaints	Confidential reporting channels for concerns, complaints escalation routes for POPIA and PAIA, reference to the Information Regulator and relevant professional bodies	X	X
Information Officer registration proof	Information Officer registration confirmation or certificate, and PAIA section 83 submission confirmation where applicable	-	X
Company secretarial snapshot	Directors' names as filed at CIPC, principal place of business and main business activities description	-	X
Tax and compliance attestations	SARS tax compliance status PIN, COID Letter of Good Standing, UIF and	-	X

Category of Records	Types of the Record	Available on Website	Available on Request
	Workman's Compensation proof where applicable		
Insurance confirmations	Professional indemnity and public liability cover summaries, insurers, limits, and validity dates	-	X
Supplier Code of Conduct	Ethical conduct expectations, anti-bribery and corruption standards, conflict of interest rules, gifts and hospitality thresholds, laboratory and healthcare partner code alignment	-	X
Standard procurement information	Onboarding steps for referring practitioners, clinics, laboratories and suppliers	-	X

6.2. Description of the records/subjects of the company which are available in accordance with any other legislation.

Category of Records	Applicable Legislation
Memorandum of Incorporation, CIPC filings, Senior management meetings, share register	Companies Act, 2008. Act 71 of 2008
Beneficial ownership register, filings, access log	Companies Regulations, 2011 as amended by the Companies Amendment Regulations on Beneficial Ownership, 2023 under the Companies Act, 2008
Director and prescribed officer disclosures	Companies Act, 2008. Act 71 of 2008
Employment contracts, attendance, overtime, payroll, leave	Basic Conditions of Employment Act, 1997. Act 75 of 1997
Disciplinary and grievance files, union correspondence, CCMA case files	Labour Relations Act, 1995. Act 66 of 1995
Employment Equity plan, annual EE reports, committee minutes	Employment Equity Act, 1998. Act 55 of 1998
Recruitment ads, shortlist records, background screening outcomes, professional registration verification where applicable	Employment Services Act, 2014. Act 4 of 2014. Protection of Personal Information Act, 2013. Act 4 of 2013
Work permission for foreign nationals	Immigration Act, 2002. Act 13 of 2002

Category of Records	Applicable Legislation
UIF declarations, contribution records, benefit claims	Unemployment Insurance Act, 2001. Act 63 of 2001
Skills plans, annual training reports, learnership agreements	Skills Development Act, 1998. Act 97 of 1998
Levy declarations, SETA registrations, grants	Skills Development Levies Act, 1999. Act 9 of 1999
PAYE, IRP5, EMP201, EMP501, tax directives	Income Tax Act, 1962. Act 58 of 1962
VAT returns, input and output schedules, SARS correspondence	Value Added Tax Act, 1991. Act 89 of 1991
COIDA registration, Return of Earnings, Letter of Good Standing, IOD claims	Compensation for Occupational Injuries and Diseases Act, 1993. Act 130 of 1993
OHS policy, laboratory and biohazard risk assessments, incident reports, safety minutes	Occupational Health and Safety Act, 1993. Act 85 of 1993 and regulations
Public liability and professional indemnity schedules, endorsements, notifications	Insurance Act, 2017. Act 18 of 2017
Patient test request forms, specimen accession logs, test reports, result release records	National Health Act, 2003. Act 61 of 2003. Protection of Personal Information Act, 2013. Act 4 of 2013
Informed consent records for testing where required, patient communications relating to results	National Health Act, 2003. Act 61 of 2003. Protection of Personal Information Act, 2013. Act 4 of 2013
DNA paternity and relationship testing records, chain of custody records for legal tests, identity verification records for tested parties	National Health Act, 2003. Act 61 of 2003. Protection of Personal Information Act, 2013. Act 4 of 2013; Health Professionals Act 56 of 1974
Women's health testing records, HPV genotyping request and result records	National Health Act, 2003. Act 61 of 2003. Protection of Personal Information Act, 2013. Act 4 of 2013; Health Professionals Act 56 of 1974
Human and medical molecular testing records, including HIV monitoring related testing records	National Health Act, 2003. Act 61 of 2003. Protection of Personal Information Act, 2013. Act 4 of 2013; Health Professionals Act 56 of 1974
Veterinary test requisitions, result reports, laboratory processing records for animal diseases and genetic testing	Animal Diseases Act, 1984. Act 35 of 1984. Protection of Personal Information Act, 2013. Act 4 of 2013; Veterinary and Para-Veterinary Professions Act 19 of 1982
Quality management system records, internal audits, corrective actions, proficiency testing, SANAS accreditation certificates and scopes	Accreditation for Conformity Assessment, Calibration and Good Laboratory Practice Act, 2006. Act 19 of 2006

Category of Records	Applicable Legislation
Point of care rapid test kit procurement, storage, distribution, customer orders, product traceability records where applicable	Medicines and Related Substances Act, 1965. Act 101 of 1965
Sample collection kit orders, dispatch records, courier booking records, delivery confirmations	Consumer Protection Act, 2008. Act 68 of 2008. Electronic Communications and Transactions Act, 2002. Act 25 of 2002; Human Tissue Act 65 of 1983
Client service agreements, service terms, complaints, refunds, service recovery records	Consumer Protection Act, 2008. Act 68 of 2008
Direct marketing consents, opt out logs, email and SMS logs	Protection of Personal Information Act, 2013. Act 4 of 2013, section 69. Electronic Communications and Transactions Act, 2002. Act 25 of 2002
Data subject notices, consent records, operator agreements, retention schedules	Protection of Personal Information Act, 2013. Act 4 of 2013
Security policies, access controls, breach register, Regulator and data subject notifications	Protection of Personal Information Act, 2013. Act 4 of 2013, sections 19 to 22
Information Regulator correspondence, remedial actions evidence	Protection of Personal Information Act, 2013. Act 4 of 2013, sections 22 to 23
Data subject rights requests register, outcomes, response packs	Protection of Personal Information Act, 2013. Act 4 of 2013, sections 23 to 25
DIO designations and revocations, IO registration proof	Regulations made under the Protection of Personal Information Act, 2013. Act 4 of 2013 and outputs from the Information Regulator portal
PAIA Manual, access request log, decision register, fee records, training logs	Promotion of Access to Information Act, 2000. Act 2 of 2000
Electronic communications policies, e signature consents, website terms	Electronic Communications and Transactions Act, 2002. Act 25 of 2002
Call recording policies,	Regulation of Interception of Communications and Provision of Communication Related Information Act, 2002. Act 70 of 2002
Cyber incident register, takedown requests, forensic reports	Cybercrimes Act, 2020. Act 19 of 2020
Document retention schedules, archive registers, disposal certificates	National Archives and Records Service of South Africa Act, 1996. Act 43 of 1996;
Laboratory reagents, hazardous substances registers, storage and handling records, MSDS files	Hazardous Substances Act 15 of 1973

Category of Records	Applicable Legislation
Clinical and laboratory waste disposal registers, waste carrier contracts, destruction certificates	National Environmental Management. Waste Act, 2008. Act 59 of 2008
Fleet files for specimen and kit transport, driver licences and PDPs, vehicle licences, logbooks, accident files	National Road Traffic Act, 1996. Act 93 of 1996. Road Accident Fund Act, 1996. Act 56 of 1996
CCTV footage at entrance to laboratory, visitor registers	Protection of Personal Information Act, 2013. Act 4 of 2013. Private Security Industry Regulation Act, 2001. Act 56 of 2001

6.3. The company keeps certain records as required by PAIA and POPIA:

6.3.1. PAIA records: PAIA Manual, official guides, submission records, and awareness training materials.

6.3.2. POPIA records: Information Officer registration certificate, data breach records, retention records, and awareness training materials.

6.3.3. Other relevant information may also be made available on request.

6.4. The tabulated records above may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

7. REQUEST PROCESS

An individual who wishes to place a request must comply with all the procedures laid down in PAIA:

7.1. Initiating the request

7.1.1. Use the prescribed form

7.1.1.1 All requests must be made on the prescribed form (**Form 2 – Request for Access to Record [Regulation 7]**) - Request for Access to Record [Regulation 7].

7.1.1.2 Additional prescribed forms include:

7.1.1.2.1. **Form 2 – Request for Correction or Deletion** (section 24 of POPIA). This form is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data. - Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information.

7.1.1.2.2. **Form 3 – Application for a Code of Conduct** (section 61 of POPIA). This form is used by an industry body, profession, or class of entities to apply for the issuance of

a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing. - Application for the Issue of a Code of Conduct.

7.1.1.2.3. **Form 4 – Request for Consent for Direct Marketing** (section 69 of POPIA). This form enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to. - Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing.

7.1.1.2.4. **Form 5 – Complaint Regarding Interference with Personal Information**. This form Information) allows a data subject or complainant to submit a complaint to the Regulator concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations. - Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing

7.1.2. Requests not submitted on the prescribed form may be rejected.

7.1.3. Assistance in the request process:

7.1.3.1. If a requester is illiterate or disabled, they may make the request orally to the IO/DIO who must complete the prescribed form on their behalf and provide them with a copy (section 18(3) of PAIA).

7.1.3.2. The IO/DIO must provide reasonable assistance to any requester who requires help in completing the form or understanding the procedure.

7.2. Particulars of the Request

7.2.1. The request must provide sufficient detail to enable the IO to identify and process it. This includes:

7.2.1.1. A clear description of the record(s) requested.

7.2.1.2. Full identity of the requester, with proof of identity where required.

7.2.1.3. The preferred form of access (inspection, copy, electronic copy, etc.).

7.2.1.4. The requester's contact details (postal, physical, fax or email).

7.2.1.5. A statement that the record is required to exercise or protect a right, specifying the nature of that right and explaining why the record is necessary.

7.2.1.6. If a request is made on behalf of another person, proof of authorisation must be attached.

7.3. Submission of Requests

7.3.1. The completed form, together with proof of payment of the prescribed request fee (if applicable), must be submitted to the Information Officer/Deputy Information Officer at the Company.

7.3.2. Requests may be lodged by:

7.3.2.1. Hand delivery to the physical address provided in this Manual;

7.3.2.2. Postal delivery to the Company's registered address;

7.3.2.3. Email to the address of the IO or DIO.

7.3.3. Where applicable, the IO may require a deposit in terms of section 22(2) of PAIA where search and preparation is expected to be time-consuming.

7.4. Fees and Timeframes for Response

7.4.1. Requests will be processed and responded to within 30 (thirty) calendar days of receipt.

7.4.2. In terms of section 26 of PAIA, the IO may extend this period once, by up to 30 additional days, if:

7.4.2.1. The request involves a large number of records;

7.4.2.2. Consultation with third parties is required; or

7.4.2.3. The records are located in another office and cannot reasonably be obtained within 30 days.

7.4.3. If an extension is required, the requester will be notified in writing, with reasons for the extension.

7.4.4. A request fee may be charged for non-personal requests.

7.4.5. If the search and preparation of the record will exceed six (6) hours, the requester may be required to pay a deposit of up to one-third of the estimated fee.

7.4.6. Access will only be granted once all required fees have been paid.

7.5. Outcome of Request

7.5.1. The IO will notify the requester in writing, using **Form 3 -** Outcome of Request and of Fees Payable [Regulation 8], of the decision to grant or refuse access.

7.5.2. If access is granted, the notice will:

7.5.2.1. Specify the form of access; and

7.5.2.2. State the applicable access fees payable before access is given.

7.5.3. If access is refused, the notice will set out the grounds for refusal as provided in Chapter 4 of PAIA.

7.6. Appeals and Complaints

7.6.1. If access is refused or deemed refused (i.e. no decision within the prescribed period), the requester may:

7.6.1.1. Lodge an internal appeal (for public bodies); or

7.6.1.2. Refer the matter to the Information Regulator or approach a court of law (for private bodies).

7.6.2. The Regulator can be contacted using the details provided in this Manual.

8. GROUNDS FOR REFUSAL

In terms of Chapter 4 of PAIA, the company may refuse a request for access to records on the following grounds (unless an exception applies):

8.1. Privacy of individuals

To protect the personal information of a third party (including deceased persons) where disclosure would be unreasonable.

8.2. Commercial interests of third parties

Records may be refused if they contain:

8.1.1. Trade secrets;

8.1.2. Financial, commercial, scientific, or technical information, where disclosure could cause harm; or

8.1.3. Information provided in confidence, where disclosure could disadvantage or prejudice the third party in negotiations or competition.

8.3. Confidentiality agreements

Information that is protected under a contract or agreement with a third party.

8.4. Safety and security

Records that could endanger the life, health, or safety of a person, or the protection of property

8.5. Legal privilege

Records that would be privileged from disclosure in legal proceedings.

8.6. Commercial interests of the company

Records may be refused if they contain:

8.6.1. Trade secrets;

8.6.2. Financial, commercial, scientific, or technical information that could harm the company's interests;

8.6.3. Information that could prejudice the company in negotiations or competition; or

8.6.4. Proprietary computer programs protected by copyright or intellectual property law.

8.7. Research information

Where disclosure would place ongoing research or a researcher at a serious disadvantage.

8.8. Frivolous or unreasonable requests

Requests that are clearly frivolous, vexatious, or that would cause an unreasonable burden on company resources.

9. REMEDIES SHOULD A REQUEST BE REFUSED

9.1. If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO are final.

9.2. The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

10. FEES

The following fees shall be payable upon request by a requestor:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by the company	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Base/starting rate to search for and prepare the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Rate to search for and prepare the record for disclosure	R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)
Postage, email or any other electronic transfer	Actual expense, if any

11. PROCESSING OF PERSONAL INFORMATION

11.1. The company processes personal information in accordance with the conditions for lawful processing as set out in the Protection of Personal Information Act, 4 of 2013 ("POPIA"). Personal information is processed only for legitimate business purposes, which may include (but are not limited to):

11.1.1. Employment-related purposes: Recruitment, administration of employment contracts, payroll, benefits, training, and compliance with labour laws.

11.1.2. Client and supplier management: Entering into and performing contracts, maintaining relationships, processing payments, and responding to queries or complaints.

11.1.3. Legal and compliance obligations: Compliance with statutory and regulatory requirements, record keeping, audits, and reporting.

11.1.4. Security and risk management: Protecting company property, monitoring access, preventing fraud, and ensuring the safety of staff, clients, and visitors.

11.1.5. Marketing and communication: Providing information about products or services, subject to obtaining the necessary consent under POPIA.

11.2. The company ensures that personal information is processed lawfully, reasonably, and only for the purposes for which it was collected and takes appropriate steps to protect the confidentiality and integrity of such information.

11.3. Description of the categories of data subjects and of the information or categories of information relating thereto:

11.3.1. The company processes personal information relating to various categories of data subjects. The categories of data subjects, and the types of personal information that may be processed in respect of each, include (but are not limited to) the following:

Categories of Data Subjects	Personal Information that may be Processed
Patients and test subjects for human medical and molecular testing	Names and surnames, identity or passport numbers, date of birth, sex, contact details, physical and postal address, medical aid details, ICD-10 diagnostic codes, clinical history supplied on requisition forms, specimen and sample identifiers, collection details, laboratory tracking numbers, test selection, laboratory results and interpretations, genetic and molecular data, billing records, invoices, payments, client communications (relating to appointments, testing, billing and results , result release audit trail.
Patients and test subjects for Women's Health testing	Names and surnames, identity or passport numbers, contact details, medical aid details, ICD-10 codes, specimen identifiers, test selection, results linked to women's health panels including HPV related testing, billing records, communications, result release audit trail.

Individuals undergoing DNA paternity and relationship testing	Names and surnames, identity or passport numbers, contact details, relationship details, consent records, guardian details where a minor is involved, chain of custody details, sample identifiers, collection and submission details, results, documentation used for legal testing workflows, billing records, communications.
Parents, legal guardians, caregivers of minors involved in testing	Names and surnames, identity or passport numbers, contact details, proof of guardianship, consent for the minor, supporting documents supplied for consent or authority to test, billing records, communications.
Referring doctors, clinicians, nurses, midwives, phlebotomy points	Names and surnames, practice identifiers, business contact details, referral and requisition details, clinical notes supplied for testing, courier and collection instructions, result delivery preferences, communications, audit trails.
Corporate clients and institutional clients	Company identifiers, registration and VAT numbers, named contacts, job titles, business contact details, contracts, service level terms, orders, invoices, payment history, queries, communications, audit trails.
Veterinary practices, veterinarians, veterinary nurses	Practice identifiers, business contact details, veterinary test requests, sample and specimen identifiers, courier details, result delivery details, communications, audit trails and access details where applicable.
Animal owners, breeders, farms, livestock operations	Names and surnames, contact details, farm or business identifiers, animal identifiers and pedigrees, parentage and genetic profiling data for animals, sample identifiers, chain of custody details for profiling use cases, billing records, communications.
Customers ordering collection kits or submitting online forms	Names and surnames, contact details, province, email address, telephone and mobile numbers, enquiry content, order forms, delivery details, billing and payment records, communications, audit trails.
Courier partners and sample transport providers	Contact persons, collection and delivery instructions, tracking numbers, chain of custody confirmations, pickup and delivery time stamps, temperature handling confirmations, where recorded, incident reports linked to transport exceptions.
Suppliers, service providers, contractors	Company identifiers, named contacts, job titles, contact details, contract records, due diligence records, tax and banking details, invoices, payments, communications, access logs for onsite work.
Employees and contractors	Names and surnames, identity numbers, contact details, payroll and benefits records, attendance and leave records, disciplinary and grievance records, training records, access control logs, device and system access records, OHS incident and exposure records where recorded.
Job applicants	Names and surnames, contact details, CVs, qualifications, reference checks, screening outcomes, interview notes, recruitment communications.

12. THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED

12.1. Personal information held by the company may be disseminated to third parties only when lawful and necessary for business, contractual, or regulatory purposes. Categories of personal information and possible recipients include (but are not limited to):

Category of Personal Information	Recipients or Categories of Recipients
Identity numbers, names, patient and client contact details, practice and business contact details	Government departments and regulatory authorities where required, law enforcement under lawful request, auditors, banks and payment processors for KYC and settlement where required, medical schemes and administrators for claims support where applicable, courier and specimen transport partners for collection and delivery, the Information Regulator for statutory submissions, legal advisors for disputes and litigation support.
Patient clinical information, test requests, clinical notes on requisitions, ICD-10 codes where supplied, laboratory results and interpretations	Referring to doctors, clinics, hospitals and authorised healthcare providers for result delivery, patient nominated recipients under written instruction, medical schemes and administrators where required for claims validation, laboratory consultants and specialist reviewers under confidentiality, quality assurance providers for proficiency testing and EQA where required, legal advisors and courts under lawful process.
Genetic, molecular, DNA and relationship testing data, including chain of custody records	Data subjects and authorised nominees, referring practitioners where applicable, courts and legal representatives where testing forms part of a legal process, law enforcement under lawful request, accredited external laboratories where confirmatory testing or referral testing is required, courier partners for chain of custody execution, quality assurance providers for proficiency testing where required.
Specimen and sample identifiers, collection details, accession numbers, courier tracking and delivery confirmations	Collection sites, referring practices, clinics and hospitals, courier and specimen transport partners, external laboratories for referral testing, laboratory information system providers for system processing and audit trails, incident response partners where specimen integrity incidents are investigated.
Qualifications, professional registrations, licenses and professional history of staff and contractors	SAQA professional bodies and councils relevant to healthcare professionals, background screening providers, recruitment service providers, auditors, client credentialing teams where contractually required, training providers and accreditation bodies where required.
Credit and payment history, billing records, invoices, account statements	Banks and payment processors, external accountants, auditors, clients for reconciliation and account management, debt collection agencies where applicable, credit bureaus where lawful and applicable.
Medical aid and scheme information, membership numbers, claims supporting documentation where applicable	Medical aid schemes and administrators, managed care organisations where applicable, authorised billing partners, auditors, legal advisors where disputes arise.
Tax and payroll records, UIF and COID records, employee benefits administration	SARS, payroll service providers, pension or provident fund administrators, medical aid and employee benefit providers, UIF administrators, COID administrators and compensation authorities, auditors and external accountants.
Health and safety information, incident and exposure records, occupational health records	Occupational health practitioners, medical aid providers, compensation authorities, insurers and loss adjusters, external OHS consultants, law enforcement where required for incident escalation.
Quality management and accreditation records, audit reports, proficiency testing and corrective action records	SANAS, external auditors, proficiency testing and EQA providers, contracted quality consultants, client audit teams where contractually required, insurers where relevant to claims and risk assessments.

Contractual and business information, service agreements, SLAs, complaints records, dispute records	Clients including corporates, clinics, hospitals, veterinary practices and partners, legal advisors, auditors, consultants, insurers, finance and banking partners for contractual performance and risk.
B-BBEE credentials and supplier data	Verification agencies, client procurement departments, tender portals and industry platforms where disclosure is required for onboarding and tendering, auditors.
Training and induction records, competency and CPD completion records	Training providers, SETA bodies for learnerships and grants where applicable, auditors, client credentialing and audit teams where contractually required.
Direct marketing preferences and contact data	Email and SMS service providers, CRM and campaign management vendors, suppression list and preference management vendors to honour opt-outs, auditors where required for compliance verification.
CCTV footage, access control logs, visitor registers	Security service providers, facilities management, insurers, law enforcement under lawful request, forensic investigators and incident response partners - where necessary to investigate security or fraud incidents.
Fleet, courier routing, tracking and incident data for specimen and kit transport	Courier and logistics partners, telematics providers where used, fleet insurers, accident investigators, tow services and panel beaters where incidents occur, law enforcement and AARTO enforcement authorities where applicable.
Digital and IT records including user IDs, device IDs, system logs, backups, access logs	Cloud hosting providers, managed IT and cybersecurity vendors, laboratory information system providers, SaaS vendors supporting operations, incident response partners, and forensic investigators where required.
Data protection governance records, operator agreements, breach and incident logs, DPIAs	The Information Regulator, clients in their capacity as responsible parties where contractually required, legal counsel, insurers for cyber and professional cover, auditors and compliance consultants.
Procurement and vendor onboarding packs, due diligence records	Due diligence providers, screening databases, client procurement teams where contractually required, group legal, risk and finance, auditors.
Shareholder, director and beneficial ownership details	CIPC, banks for KYC, auditors, verification agencies where required for tendering and onboarding, legal advisors where required for governance and corporate actions.

13. PLANNNED TRANSFER FLOW OF PERSONAL INFORAMTION

13.1. The company may, where necessary and lawful, transfer or store personal information outside the Republic of South Africa. This could include, for example, the use of secure cloud-based service providers or international business partners. Where no transborder transfer is required; personal information will continue to be stored and processed within South Africa.

13.2. Any cross-border transfer of personal information will only take place in accordance with section 72 of POPIA, which requires that:

13.2.1. The recipient country, organisation, or international organisation is subject to a law, binding agreement, or corporate rules that provide an adequate level of protection; or

13.2.2. The transfer is necessary for the performance of a contract, with the consent of the data subject, or for another lawful reason recognised by POPIA.

14. AVAILABILITY OF THE PAIA MANUAL AT THE COMPANY

14.1. A copy of the manual is available:

14.1.1. On the website or at the head office for public inspection during normal business hours;

14.1.2. To all staff on the in-house document management LIMS Module called "Docman". Reading by staff can be monitored and tracked;

14.1.3. To any person that is not an MDS employee, upon request and upon the payment of a reasonable prescribed fee; and

14.1.4. To the Information Regulator upon request.

14.2. A fee for a copy of the manual, as contemplated in the Regulations, shall be payable per each A4-size photocopy made.

15. OBJECTION OF THE PROCESSING OF PERSONAL INFORMATION BY A DATA SUBJECT

15.1. Any person ("data subject") has the right to object to the processing of their personal information in terms of section 11(3) of POPIA.

15.2. An objection must be made on **Form 1 –** Objection to the Processing of Personal Information or a similar form. This is free of charge and can be sent by hand, post, fax, email, SMS, WhatsApp, or any other convenient method.

15.3. When personal information is collected, the company must inform the data subject of their right to object.

15.4. If an objection is made by phone, the company must record it electronically and provide a copy or written transcript to the data subject on request, at no cost.

16. REQUEST FOR CORRECTION/DELETION OF PERSONAL INFORMATION OR DESTRUCTION/DELETON OF RECORD OF PERSONAL INFORMATION

16.1. A data subject has the right, under section 24 of POPIA, to request the correction, destruction, or deletion of their personal information at any time and free of charge.

16.2. Correction or deletion may be requested if the personal information is:

16.2.1. Inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained; or

16.2.2. No longer lawfully permitted to be kept by the company.

16.3. Requests must be made using **Form 2 –** Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information or a similar form. This can be submitted free of charge by hand, post, fax, email, SMS, WhatsApp, or any other convenient method.

16.4. If a request is made by phone, the company must record it electronically and provide a copy or written transcript to the data subject on request, at no cost.

16.5. The company must respond within 30 days of receiving the request and notify the data subject in writing of the outcome and any action taken.

17. APPLICATION FORMS

PAIA Forms

Form 01: Request for a Copy of the Guide from an Information Officer [Regulation 3]

Form 02: Request for Access to Record [Regulation 7]

Form 03: Outcome of Request and of Fees Payable [Regulation 8]

Form 05: Complaint Form [Regulation 10]

Form 13: PAIA Request for Compliance Assessment Form [Regulation 14(1)]

POPIA Forms

Form 1: Objection to the Processing of Personal Information

Form 2: Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information

Form 3: Application for the Issue of a Code of Conduct

Form 4: Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing

Form 5: Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing

18. UPDATING OF THE MANUAL

The head of the company will update this manual annually.

Name of IO	Denis Francis York
Title of the head of the body	Dr