



Bonitas

INFORMATION MANUAL

IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO. 2 OF 2000, ("PAIA"), AND SECTION 18 OF THE PROTECTION OF PERSONAL INFORMATION ACT, NO. 4 OF 2013, ("POPI")

COMPILED FOR:
BONITAS MEDICAL FUND
WITH REGISTRATION NUMBER 1512
("THE PRIVATE BODY")

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1. PURPOSE OF THE MANUAL

- 1.1. This Information Manual (“manual”) extends to the information held by Bonitas Medical Fund, hereinafter referred to as “Bonitas” / “the Scheme” / “the Private Body”. Bonitas is a registered medical scheme (registration number 1512) with the Council for Medical Schemes (“CMS”) in terms of section 24 of the Medical Schemes Act 131 of 1998, as amended.
- 1.2. The administration of the Scheme has been outsourced to one or more administrators. By virtue of these relationships, the relevant administrator may assist the Scheme in fulfilling any request for information as provided for in terms of this manual.
- 1.3. This manual is published in terms of section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”), as amended by the Protection of Personal Information Act, No. 4 of 2013, (“POPI Act”) as well as section 18 of the POPI Act.
- 1.4. PAIA gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and / or protection of any right.
- 1.5. The POPI Act gives effect to the provisions of, inter alia, Section 14 of the Constitution, which provides for the right to privacy of all persons.
- 1.6. The information provided in this manual includes:
 - 1.6.1. contact details of the Principal Officer of Bonitas, hereinafter referred to as the “Head”, as defined in PAIA, of the Private Body and the Information Officer including the contact details of the Deputy Information Officer;
 - 1.6.2. a description of the guide referred to in section 10 of PAIA, (which is a guide which was produced by the Human Rights Commission and after 1 July 2021 shall be made available and amended, from time to time, by the Information Regulator defined in POPI) dealing with access to information;
 - 1.6.3. a description of the records of the Private Body which are available in terms of any legislation other than the PAIA;
 - 1.6.4. a description of the subjects on which the Private Body holds records and the categories of records held on each subject;
 - 1.6.5. a description of the subjects on which the Private Body holds personal information and the categories of personal information held on each subject;
 - 1.6.6. the purpose of processing personal information;
 - 1.6.7. the recipients to whom the personal information may be supplied;
 - 1.6.8. planned transborder flows of information (if applicable);
 - 1.6.9. a general description of the security measures in place to ensure the confidentiality, integrity, and availability of the information to be processed;
 - 1.6.10. sufficient information so as to facilitate a request for access to a record of the Private Body.
- 1.7. The reference to any information in addition to that specifically required in terms of section 51 of PAIA and section 18 of the POPI Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of PAIA and the POPI Act.
- 1.8. The main aim of this manual is to:
 - 1.8.1. disclose the types of records held by the Private Body and to facilitate the requests for access to records of the Private Body, as permitted by PAIA (dealt with in Part A hereof);
 - 1.8.2. make data subjects aware of the type and source of information being collected, the purpose of collecting and processing such information and related matters (dealt with in Part B hereof).

This manual may be updated from time to time and shall be made available on the Private Body’s website and / or at its principal place of business, to any person on request, free of charge and to the Information Regulator (“IR”).

2. DEFINITIONS AND INTERPRETATION

- 2.1. In this document, clause headings are for convenience and shall not be used in its interpretation unless the context clearly indicates a contrary intention:
- 2.2. An expression which denotes –
- 2.2.1. any gender includes the other genders;
 - 2.2.2. a natural person includes an artificial or juristic person and vice versa;
 - 2.2.3. the singular includes the plural and vice versa.
- 2.3. The following expressions shall bear the meanings assigned to them below and similar expressions bear corresponding meanings:
- 2.3.1. **“data subject”** means the person to whom personal information relates. In the context of this document, this may include the member, beneficiaries, dependants or Personnel;
 - 2.3.2. **“Personal Information”** means information relating to an identifiable living, natural person, and where it is applicable, an identifiable existing juristic person;
 - 2.3.3. **“personal requester”** means a data subject requesting access to their own record and further as defined in “requester”;
 - 2.3.4. **“Personnel”** refers to any person who works for or provides services to or on behalf of Bonitas and receives or is entitled to receive remuneration and / or any other person who assists in carrying out or conducting the business of Bonitas and includes, without limitation, Trustees, Independent Committee Members, all permanent, temporary and part-time staff, as well as contract workers.
 - 2.3.5. **“records”** means any record of personal information as is set out herein and extends to include health information of a data subject;
 - 2.3.6. **“this document”** or **“this manual”** means this Information Manual, together with all of its annexures, as amended from time to time;
 - 2.3.7. **“the Private Body”** means Bonitas Medical Fund to which this manual applies with registration number 1512;
 - 2.3.8. **“requester”** means a person or entity requesting access to a record that is under the control of the Private Body.
- 2.4. Any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation or other legislation as at the signature date, and as amended or substituted from time to time;
- 2.5. If any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this manual;
- 2.6. Where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this manual;
- 2.7. Where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding business day;
- 2.8. Any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months or years, as the case may be or as is otherwise defined in any legislation;
- 2.9. The use of the word “including” followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and the eiusdem generis rule shall not be applied in the interpretation of such general wording or such specific example/s;
- 2.10. In the event of any conflict, this manual is always subject to the prevailing legislation.

2.11. This manual does not purport to be exhaustive of or comprehensively deal with every procedure provided for in PAIA or all rights listed under the POPI Act. The reader relying on any provisions of this manual is advised to familiarise his/her/itself with the provisions of PAIA and the POPI Act.

2.12. Please read this manual together with the following documents:

Documents	Location
Bonitas Privacy Statement	Bonitas website Bonitas - Bonitas Privacy Policy Protecting Your Personal Information Bonitas.co.za
PAIA Guidelines	Information Regulator of South Africa https://inforegulator.org.za/paia-guidelines/
The Promotion of Access to Information Act (PAIA), Act 2 of 2000 – as amended	Information Regulator of South Africa https://inforegulator.org.za/acts/

3. CONTACT DETAILS OF THE PRIVATE BODY

–Section 51(1)(a)(i) of PAIA and Section 18(1)(b) of the POPI Act

3.1. **Head of the Private Body and Information Officer:** Lee R Callakoppen.

3.2. Postal Address of Information Officer: P.O. Box 3496, Cramerview, 2060

3.3. Street Address of Information Officer: 2nd Floor, 34 Melrose Boulevard, Melrose Arch, Johannesburg, 2076.

3.4. Telephone Number of Information Officer: +27 11 384 5100.

3.5. Email of Information Officer: informationofficer@bonitas.org.za.

3.6. **Deputy Information Officer:** Mathilda Marais.

3.7. Postal Address of Information Officer: P.O. Box 3496, Cramerview, 2060.

3.8. Street Address of Information Officer: 2nd Floor, 34 Melrose Boulevard, Melrose Arch, Johannesburg, 2076.

3.9. Telephone Number of Information Officer: +27 11 384 5100.

3.10. Email of Information Officer: informationofficer@bonitas.org.za.

3.11. General Email Address (access to information): informationofficer@bonitas.org.za.

3.12. Head Office Physical Address: c/o 2nd Floor, 34 Melrose Boulevard, Melrose Arch, Johannesburg, 2076.

3.13. Head Office Postal Address: P.O. Box 3496, Cramerview, 2060.

3.14. Head Office Telephone Number: +27 11 384 5100.

3.15. Head Office Email: informationofficer@bonitas.org.za.

3.16. Website: <https://www.bonitas.co.za>

PART A: PROMOTION OF ACCESS TO INFORMATION

4. GUIDE ON HOW TO EXERCISE RIGHTS IN TERMS OF PAIA AND HOW TO ACCESS THE PAIA GUIDE

–Section 51(1)(b)(i) of PAIA

- 4.1. The Human Rights Commission (“the HRC”) has compiled a guide, as contemplated in section 10 of PAIA, containing information to assist any person who wishes to exercise any right as contemplated in PAIA.
- 4.2. The IR has, in terms of section 10 (1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“the Guide”) easily, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.3. The Guide is available in each of the official languages and in braille.
- 4.4. The Guide can also be obtained.
 - 4.4.1. upon request from the Information Officer;
 - 4.4.2. from the website of the IR (<https://inforegulator.org.za/paia-guidelines/>).
- 4.5. The Guide contains a description of the following:
 - 4.5.1. The objects of PAIA and POPI.
 - 4.5.2. The postal and street address, phone and fax number and, if available, email address of-
 - 4.5.2.1. The Information Officer of every public body, and
 - 4.5.2.2. Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPI.
 - 4.5.3. The manner and form of a request for-
 - 4.5.3.1. Access to a record of a public body contemplated in section 11 of PAIA;
 - 4.5.3.2. Access to record of a private body contemplated in section 50 of PAIA.
 - 4.5.4. The assistance available from the Information Officer of a public body in terms of PAIA and POPI.
 - 4.5.5. 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 POPI, including the manner of lodging-
 - 4.5.5.1. An internal appeal;
 - 4.5.5.2. A complaint to the IR; and
 - 4.5.5.3. 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 IR or a decision of the head of a private body.
 - 4.5.6. The provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
 - 4.5.7. The provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
 - 4.5.8. The notices issued in terms of section 22 and 54 of PAIA regarding fees to be paid in relation to requests for access.
 - 4.5.9. The regulations made in terms of section 92 of PAIA.
- 4.6. The contact details of the IR are as follows:
 - ☒ JD House, 27 Stiemens Street, Braamfontein, Johannesburg
 - 📮 P.O Box 31533, Braamfontein, Johannesburg, 2017
 - ☎ 010 023 5200
 - ✉ enquiries@inforegulator.org.za
 - Website: <https://inforegulator.org.za/paia>

5. CATEGORIES OF RECORDS OF BONITAS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

5.1. Table below summarises the categories of records of Bonitas which are available without a person having to request access:

Category of records	Types of the Record	Available online	Available upon request
Commercial records	Publications, media releases	X	X
Governance records	Annual Integrated Report Annual Financial Statements	X	X
Privacy / information	Access to information manual (PAIA Manual)	X	X

6. DESCRIPTION OF THE RECORDS OF BONITAS WHICH ARE AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

6.1. Some of the records held by the Private Body are available in terms of legislation other than PAIA or POPI, which legislation is listed below. Records that must be made available in terms of these Acts shall be made available in terms of the requirements of PAIA and this manual. That legislation includes:

- 6.1.1. MEDICAL SCHEMES ACT, NO. 131 OF 1998
- 6.1.2. PROTECTION OF PERSONAL INFORMATION ACT (ACT 4 OF 2013)
- 6.1.3. PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000
- 1.1.1. DISASTER MANAGEMENT ACT 57 OF 2002
- 1.1.2. THE COMPANIES ACT, NO. 71 OF 2008
- 1.1.3. INCOME TAX ACT, NO. 58 OF 1962
- 1.1.4. VALUE ADDED TAX ACT, NO. 89 OF 1991
- 1.1.5. LABOUR RELATIONS ACT, NO. 66 OF 1995
- 1.1.6. BASIC CONDITIONS OF EMPLOYMENT ACT, NO. 75 OF 1997
- 1.1.7. EMPLOYMENT EQUITY ACT, NO. 55 OF 1998
- 1.1.8. SKILLS DEVELOPMENT LEVIES ACT, NO. 9 OF 1999
- 1.1.9. UNEMPLOYMENT INSURANCE ACT, NO. 63 OF 2001
- 1.1.10. ELECTRONIC COMMUNICATIONS AND TRANSACTIONS ACT, NO. 25 OF 2002
- 1.1.11. PREVENTION OF ORGANISED CRIME ACT 121 OF 1998
- 1.1.12. FINANCIAL INTELLIGENCE CENTRE ACT 38 OF 2001
- 1.1.13. NATIONAL CREDIT ACT, NO. 34 OF 2005
- 1.1.14. any other industry-related applicable legislation.

6.2. A requester may also request information that is available in terms of other legislation and may request access to related information outside this process. This includes the following categories of records and applicable legislation:

Category of records	Type of record/s	Applicable Legislation*
Regulatory	Complaints and appeals	MEDICAL SCHEMES ACT, NO. 131 OF 1998
Privacy/Information	Privacy statement	PROTECTION OF PERSONAL INFORMATION ACT (ACT 4 OF 2013)
Regulatory	PAIA Manual	PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000
Commercial	Business continuity management records	DISASTER MANAGEMENT ACT 57 OF 2002

Category of records	Type of record/s	Applicable Legislation*
Employment	Employment files	EMPLOYMENT EQUITY ACT (ACT 55 OF 1998) LABOUR RELATIONS ACT, NO. 66 OF 1995
Workplace Health and Safety	Health and Safety files	OCCUPATIONAL HEALTH AND SAFETY ACT (ACT 85 OF 1993)
Governance	Board of Trustees report, annual financial statements, accounting records, etc.	MEDICAL SCHEMES ACT, NO. 131 OF 1998

*The above is not an exhaustive list of legislation that may require Bonitas to keep records.

7. DESCRIPTION OF THE SUBJECTS ON WHICH BONITAS HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

– Section 51(1)(b)(iv) of PAIA

- 7.1. The Private Body holds various records. The subjects on which the Private Body holds records, and the categories of records held by the Private Body are reproduced in the tables below.
- 7.2. **The listing of a category or subject matter in this manual does not guarantee access to such records.** All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA and other applicable legislation. A request for records shall be made in the prescribed form set out later in this manual under the heading “FORM OF REQUEST FOR RECORDS”.

Record Subjects: Internal Administration, Compliance and Management
Categories of records held:
Records of the Medical Scheme
Records and minutes of the meetings of the Medical Scheme
Resolutions of the Medical Scheme
Agreements dealing with the internal arrangements between the trustees / independent members of the Private Body
Records relating to the creation and/or registration of the Private Body
Records relating to Internal Audit and Risk Management
Records relating to legislative compliance
Regulatory reports

Record Subjects: Human Resources
Categories of records held:
Any personal records provided to the Private Body by their Personnel
List of Personnel
Conditions of employment and other employee-related contractual and quasi-legal records
Personnel tax and insurance fund information including unemployment insurance fund contributions, group life, disability and income protection
Pension and provident fund records

Record Subjects: Human Resources
Health and Safety records
Internal evaluation records
Codes of conduct as well as the relevant disciplinary codes and procedures
All internal policies applicable and accessible to Personnel
Any records a third party has provided to the Private Body about any of their Personnel
Other internal records and correspondence relating to Personnel

Record Subjects: Finance
Categories of records held:
Financial statements and other accounting records
Accounting reports
Taxation records
Insurance records
Banking statements

Record Subjects: Members, Beneficiaries and Dependants
Categories of records held:
Any records a third party has provided to the Private Body about members, beneficiaries and dependants
Confidential, privileged, contractual and quasi-legal records of members, beneficiaries and dependants
Members, beneficiaries and dependants evaluation records
Members, beneficiaries and dependants profiling
Performance research conducted on behalf of members, beneficiaries and dependants or about them
Any records a third party has provided to the Private Body either directly or indirectly

Record Subjects: Service Providers, Suppliers and Third Parties
Categories of records held:
Lists of service providers and suppliers

Record Subjects: Assets
Categories of records held:
Register of assets (movable or immovable)
Insurance records relating to the assets

Record Subjects: Other Records
Categories of records held:
Information relating to the Private Body's own commercial activities
Research information belonging to the Private Body, whether carried out itself or commissioned from a third party
Environment and market information

Record Subjects: Other Records
Records relating to project management
Information technology including information systems, network security, software licenses, technology asset
Records relating to support services
Internal communication

** The above is not exhaustive listings of records that is kept by Bonitas.*

8. FORM OF REQUEST FOR RECORDS

- 8.1 A request for records shall be accompanied by adequate proof of identity of the applicant, (such as a certified copy of his / her identity document), and made using the prescribed form, a copy of which is attached hereto and marked **Annexure “A”** (“the prescribed form”). The prescribed form is also available from the website of the IR at <https://inforegulator.org.za/paia-forms/>.
- 8.2 The prescribed form shall be submitted to the Head of the Private Body named in clause 3 hereof.
- 8.3 The above procedure shall apply in the event that the requester is requesting information for personal use and / or on behalf of another person, even if such other person is a permanent employee of the Private Body.
- 8.4 The Head of the Private Body shall as soon as reasonably possible, and within 30 (thirty) days after the request has been received, decide whether or not to grant such request.
- 8.5 The requester will be notified of the decision of the Head of the Private Body or the assigned manager in the manner indicated by the requester.
- 8.6 After access is granted, actual access to the record requested will be given as soon as reasonably possible.
- 8.7 If the request for access is refused, the Head of the Private Body or the assigned manager shall advise the requester in writing of the refusal. The notice of refusal shall state:
- 8.7.1 adequate reasons for the refusal; and
 - 8.7.2 that the requester may lodge an appeal with a court of competent jurisdiction against the refusal of the request (including the period) for lodging such an appeal.
- 8.8 If the Head of the Private Body or the assigned manager fails to respond within 30 (thirty) days after a request has been received, it is deemed, in terms of section 58 read together with section 56(1) of PAIA, that the Head of the Private Body or the assigned manager has refused the request.

9 FEES PRESCRIBED IN TERMS OF THE REGULATIONS

– Section 54 of PAIA, Regulation 7(4), Regulation 8 and Annexure B to the Regulations

9.1 The following applies to requests:

- 9.1.1 A requestor is required to pay the prescribed fees before a request is processed (in line with Section 54(1) of PAIA and in terms of item 1 of Annexure B to the Regulations).
- 9.1.2 If the preparation of the record requested requires more than the prescribed 6 (six) hours, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted) (in line with Regulation 8(3)(b)).
- 9.1.3 A requestor may lodge an application with a court against the tender / payment of the request fee and/ or deposit.

9.2 Records may be withheld until the fees have been paid.

9.3 The fee structure shall be available by way of regulations published from time to time. Fees are subject to amendment without notice and are exclusive of VAT.

9.4 Fees payable in respect of Private Bodies as outlined in **Annexure B to the Regulations**:

Item	Description:	Fee:
1	The request fee payable by each requester	R140.00
2	Photocopy / printed black & white copy of A4-size page	R2.00 per page or part thereof.
3	Printed copy of A4-page	R2.00 per page or part thereof.
4	For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00
5	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service Provider.
6	Copy of visual images	
7	Transcription of an audio record, per A4-size	R24.00
8	Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00
9	To search for and prepare the record for disclosure for each hour of part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00 R435.00
10	Deposit: if search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11	Postage, e-mail or any other electronic transfer	Actual expense, if any.

10 INFORMATION OR RECORDS NOT FOUND

- 10.1 If a requested record cannot be found or if the records do not exist, the Head of the Private Body or his authorised representative must, by way of an affidavit or an affirmation, notify the requester that it is not possible to give access to the requested record.
- 10.2 The affidavit or affirmation must provide a full account of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the person deposing of such affidavit with every person who conducted the search.
- 10.3 This notice will be regarded as a decision to refuse a request for access to the record concerned for the purposes of the PAIA.
- 10.4 If the record should later be found, the requester must be given access to the record in the manner stipulated by the requester in the prescribed form unless access is refused by Bonitas.
- 10.5 The attention of the requester is drawn to the provisions of Chapter 4 of the PAIA in terms of which the Scheme may refuse, on certain specified grounds, to provide information to a requester.

PART B: PROTECTION OF PERSONAL INFORMATION

11 PROCESSING PERSONAL INFORMATION

- Section 51(1)(c)(i)-(iii) of PAIA read with section 18 of the POPI Act

- 11.1 The Private Body processes certain personal information, as defined in the POPI Act, (“Personal Information”) relating to several data subjects, from time to time. A data subject is the person, (natural or juristic), to whom Personal Information relates and from whom the Private Body collects and processes information.
- 11.2 We process personal information and special personal information – where applicable mainly to:
- 11.2.1 Develop, monitor and improve our systems and processes.
 - 11.2.2 To communicate with our clients, members, vendors, partners, service providers, etc.
 - 11.2.3 Resolve complaints or queries.
 - 11.2.4 Fulfil legal or contractual obligations, including assisting with law enforcement, or complying with information requests by regulators and meeting our regulatory reporting obligations.
- 11.3 A description of the categories of Data Subjects and of the information or categories of information relating thereto is reproduced in the tables below.

** The tables below include a non-exhaustive list of personal information that Bonitas may process.*

Categories of Data Subjects	Personal Information that may be processed*
Personnel	Name, personal contact information, date of birth, email address, user id, job title, employment history, personal interests, educational history, gender, nationality, salary and benefit details, images, date of hire, manager, performance reviews, details of internal training undertaken, professional contact information (email address, business phone number, job title, division), travel and expenses data, grievances, record of app and website visits, IP address, cookie data, preferences, financial data, user account details, compliance investigatory data such as whistle-blower reports, editorial content, CCTV footage, any other related personal information.

Categories of Data Subjects	Personal Information that may be processed*
Prospective Personnel	Name, personal contact information, date of birth, email address, job title, employment history, personal interests, educational history, gender, nationality, salary and benefit details, images, professional contact information (email address, business phone number, job title, division), CCTV footage, any other related personal information.
Juristic Entities, including service providers, vendors, suppliers	Name, Company/Entity registration number, income tax and VAT registration details, BEE certificates, address, bank details, agreements, any other related individual data.
Members	Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person.

11.4 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 their personal information may be supplied
Commercial, financial, fraud or criminal records or as required to meet purpose specification.	Regulatory bodies, statutory oversight bodies, regulators, data protection authorities, fraud prevention bodies, law enforcement, due diligence agencies, or judicial commissions of enquiry making a request for data.
Commercial, financial or as required to meet purpose specification.	Any court, administrative or judicial forum, arbitration, statutory commission or ombud making a request for data.
Commercial or financial, tax records or as required to meet purpose specification.	South African Revenue Service, or another similar authority.
Personal information as required to meet purpose specification. e.g. name, surname, contact details, transactional information, call recordings, etc.	Third parties with whom Bonitas have a contractual relationship for the processing of data (for example, a third-party archiving service or payment provider, benefit partners, service providers and Bonitas professionals, who you have already consented to receiving personal information, as academics and researchers. Bonitas ensures that the academics and researchers only use information that has been de-identified.
Commercial or financial records or as required to meet purpose specification.	Auditing and accounting bodies (internal and external)
Personal information as requested, subject to the provisions of PAIA and POPIA.	Anyone making a successful application for access in terms of PAIA and POPIA.
Commercial or financial records or as required to meet purpose specification	Credit bureau or credit providers, industry association or other association for an industry sector in which Bonitas operates.



- 11.5 Where Personal Information is collected in terms of specific legislation, the Private Body will inform the data subject in terms of which legislation that data is collected.
- 11.6 Data subjects have the right to object to the processing of their Personal Information.
- 11.7 In the event a data subject requires confirmation regarding the existence of the Personal Information processed by the Private Body or believes that the Personal Information processed by the Private Body requires rectification, the data subject is entitled to utilise the processes and procedures set out in section A of this manual to request access to the records of the Private Body set out in section 18(1)(h)(iii).
- 11.8 We will not, without data subjects' express consent use their Personal Information for any purpose, other than:
specifically:
11.8.1 as set out in the abovementioned tables;
generally:
11.8.2 in relation to the provision of any goods and services to a data subject;
11.8.3 to inform the data subject of new features, special offers and promotional competitions offered by us or any of our divisions, affiliates and / or partners (unless they have opted out from receiving marketing material from us);
11.8.4 to improve our product and / or service selection and their experience on our website; or
11.8.5 to disclose their Personal Information to any third-party as set out below:
11.8.5.1 to our employees and / or third-party service providers who assist us to interact with data subjects via our website, for the ordering of goods or services or when delivering goods or services to data subjects, their personal and contact information being essential in order to assist us to communicate with the data subjects properly and efficiently;
11.8.5.2 to our divisions, affiliates and / or partners (including their employees and/or third-party service providers) in order for them to interact directly with data subjects via email or any other method for purposes of sending data subjects marketing material regarding any current or new goods or services, new features, special offers or promotional items offered by them (unless the data subjects have opted out from receiving marketing material from us);
11.8.5.3 to law enforcement, government officials, fraud detection agencies or other third parties when we believe in good faith that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, to report or support the investigation into suspected illegal activity;
11.8.5.4 to our service providers (under contract with us) who help with parts of our business operations (fraud prevention, marketing, technology services etc.). However, these service providers may only use data subjects information in connection with the services they perform for us and not for their own benefit;
11.8.5.5 to our suppliers in order for them to liaise directly with data subject regarding any defective goods or services which requires their involvement;
11.8.5.6 to any third-party seller for purposes of sending data subjects an invoice for any goods purchased from such third-party seller, which disclosed information will be limited to data subjects' email addresses.
- 11.9 We are entitled to use or disclose data subjects' Personal Information if such use or disclosure is required in order to comply with any applicable law, subpoena, order of court or legal process served on us, or to protect and defend our rights or property. In the event of a fraudulent online payment, we are entitled to disclose relevant Personal Information for criminal investigation purposes or in line with any other legal obligation for disclosure of the Personal Information which may be required of it.
- 11.10 Data subjects' privacy is important to us and we will therefore not sell, rent or provide their Personal Information to unauthorised third parties for their independent use, without their consent.

- 11.11 We will not process personal information concerning:
- 11.11.1 the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or
 - 11.11.2 the criminal behaviour of a data subject to the extent that such information relates to i) the alleged commission by a data subject of any offence; or ii) any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings;
unless
 - 11.11.2.1 the data subject has given us specific consent to process such data; or
 - 11.11.2.2 processing is necessary for the establishment, exercise or defence of a right or obligation in law;
 - 11.11.2.3 processing is necessary to comply with an obligation of international public law; or
 - 11.11.2.4 processing is for historical, statistical or research purposes to the extent that: (i) the purpose serves a public interest or (ii) requesting consent would constitute an unreasonable requirement in the circumstances.
- 11.12 In line with our obligations in terms of section 22 of the POPI Act, where there are reasonable grounds to believe that Personal Information has been accessed or acquired by any unauthorised person, we will notify the IR and the data subject, where possible.
- 11.13 When data subjects provide a rating or review of our services and / or goods, they consent to us using that rating or review as we deem fit, including without limitation, on our website, in newsletters or other marketing material. The name that will appear next to that rating or review is their first name, as they would have provided. We will not display their surname, nor any of their contact details, with a rating or review.
- 11.14 We will:
- 11.14.1 treat data subjects' Personal Information as strictly confidential, save where we are entitled to share it as set out in this section;
 - 11.14.2 take appropriate technical and organisational measures to ensure that data subjects' Personal Information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
 - 11.14.3 provide data subjects with access to their Personal Information to view and / or update personal details;
 - 11.14.4 promptly notify data subjects if we become aware of any unauthorised use, disclosure or processing of their Personal Information;
 - 11.14.5 provide data subjects with reasonable evidence of our compliance with our obligations under this section on reasonable notice and request; and
 - 11.14.6 upon data subjects request, promptly return or destroy any and all of their Personal Information in our possession or control, save for that which we are legally obliged to retain.
- 11.15 We will not retain data subjects' Personal Information longer than the period for which it was originally needed, unless we are required by law to do so, or they consent to us retaining such information for a longer period.
- 11.16 We undertake never to sell or make data subjects' Personal Information available to any third-party other than as provided for in this section.
- 11.17 Whilst we will do all things reasonably necessary to protect data subjects' rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of data subjects' Personal Information, whilst in our possession, made by third parties who are not subject to our direct control, unless such disclosure is as a result of our gross negligence.
- 11.18 Should a data subject believe that we have used their Personal Information contrary to this manual and the provisions of the POPI Act, the data subject should first attempt to resolve any concerns with us. If the data subject is not satisfied, they have the right to lodge a complaint with the IR (which address can be found in section 5.6 above), established in terms of the POPI Act.

12 TRANSBORDER FLOWS OF PERSONAL INFORMATION

– (section 51(1)(iv) of PAIA and section 18(1)(g) of the POPI Act.

- 12.1 The Private Body may from time to time need to transfer authorised Personal Information to another country for storage purposes or for the rendering of services by a foreign third-party service provider or otherwise. We will ensure that any person that we pass data subjects' Personal Information to agrees to treat their information with the same level of protection as we are obliged to in terms of section 72 of the POPI Act.

13 SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

- 13.1 The security measures implemented by the Private Body to ensure the confidentiality, integrity and availability of Personal Information, are listed and described below:

Physical Security Measures:	Cyber Security Measures:
Access control to the premises and certain key areas, which access is restricted to authorised personnel	Firewalls
Devices and user stations are password protected	Virus protection
Devices (laptops or otherwise) and user stations are safely secured by case lock or otherwise when not in use	Password protection on devices are changed regularly
Servers are stored in access-controlled rooms	Virtual private network
Security gate	Data encryption
Cameras	Remote destruction
Access control (employee key card)	Systems and devices are automatically locked after certain periods of inactivity
Rack mount servers are used	Data transferred using encrypted channels of communication
Safe storage of physical documentation	Data is backed up
Discarded documentation is shredded	Protection of information stored on printers

14 AVAILABILITY OF MANUAL

- 14.1 A copy of this manual is available, as well as the prescribed form, on the Bonitas website: <https://www.bonitas.co.za/paia-manual>.

- 14.2 A copy of the manual is also available:

14.2.1 At the Head Office, situated at 2nd Floor, 34 Melrose Boulevard, Melrose Arch, Johannesburg, 2076;

14.2.2 The Information Regulator upon request.

15 UPDATES TO THE MANUAL

- 15.1 The Private Body may update this manual from time to time as it may deem necessary.

24 November 2025

DATE

Lee R Callakoppen

THE HEAD OF THE PRIVATE BODY