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## **PROMOTION OF ACCESS TO INFORMATION MANUAL**

COMPILED IN COMPLIANCE WITH SECTION 51 OF THE PROMOTION  
OF ACCESS TO INFORMATION ACT (2 OF 2000)

FOR

SIGNANT HEALTH SOUTH AFRICA (PTY) LTD ("**SIGNANT HEALTH**")

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## Version control

| Version           | Amendments      | Amended by / approved by                                                                           |
|-------------------|-----------------|----------------------------------------------------------------------------------------------------|
| 21 September 2026 | Initial version | Corlee Herbst (Information Officer) and Agnes Foldi (Signant Health Group Data Protection Officer) |
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## 1. INTRODUCTION

- 1.1 Signant Health South Africa (Pty) Ltd, with a registered address in Johannesburg, is part of a global organisation ("**Signant Health Group**"), that operates through various separate and distinct legal entities. Each Signant Health Group entity is a separate legal entity, distinct from other Signant Health Group entities, and is not responsible for the acts or omissions of, nor can bind or obligate, another Signant Health Group entity.
- 1.2 This Manual provides an outline of the type of records and the personal information it holds and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 ("**PAIA**"). In addition, it explains how to access, or object to, personal information held by Signant Health, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 ("**POPIA**"). PAIA and POPIA give effect to everyone's constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 1.3 The aim of this Manual is to facilitate requests for access to records and information held by Signant Health, and to assist potential requesters as to the procedure to be followed when requesting access to such records and information.
- 1.4 In terms of section 50 of PAIA, any person that requests a record on their behalf, or on behalf of another person, must be given access to any record of a private body if (a) that record is required for the exercise or protection of any rights, (b) that person complies with the procedural requirements in PAIA relating to a request for access, and (c) access to that record is not refused in terms of any ground for refusal contemplated in clause 15. Such a request includes a request for access to a record containing personal information about the requester or the person on whose behalf the request is made.
- 1.5 This Manual has been prepared in accordance with section 51 of PAIA and reference to any information in this Manual in addition to that specifically required in terms of section 51 of PAIA does not create any right or entitlement to receive such information, other than in terms of PAIA or POPIA.
- 1.6 This Manual may be amended from time to time by Signant Health, the latest version of the Manual will be made public as soon as it is finalised.
- 1.7 If any provision in a definition is a substantive provision, conferring rights or imposing obligations on any party, notwithstanding that such provision is only contained in the relevant definition, effect shall be given to that provision as if it were a substantive provision in the body of this Manual.
- 1.8 Where any term is defined within a particular clause other than clause 2, that term shall bear the meaning ascribed to it in that clause wherever it is used in this Manual.
- 1.9 This Manual does not purport to be exhaustive of, or comprehensively deal with, every procedure provided for in PAIA or POPIA. A requester is advised to familiarise himself with the provisions of PAIA and POPIA before lodging any request with Signant Health.

## 2. INTERPRETATION

- 2.1 In this Manual, unless the context clearly indicates otherwise:
  - 2.1.1 "**Information Officer**" means the person duly authorised and appointed in clause 4.1 to facilitate or assist the Head of Signant Health, with any request in terms of PAIA and/or POPIA;
  - 2.1.2 "**Manual**" means this document as issued by Signant Health, as may be updated from time to time;
  - 2.1.3 "**PAIA**" means the Promotion of Access to Information Act (2 of 2000), including any applicable regulations;

- 2.1.4 **"POPIA"** means the Protection of Personal Information Act (4 of 2013), including any applicable regulations;
- 2.1.5 **"Regulator"** means the Information Regulator established under POPIA;
- 2.1.6 **"requester"** means (i) any person, including, but not limited to, a public body or an official thereof, making a request for access to a record held by Signant Health pursuant to PAIA; (ii) any data subject making a request in relation to personal information held by Signant Health pursuant to POPIA; or (iii) a person acting on behalf of the person contemplated in (i) or (ii); and
- 2.1.7 **"Supplier"** means any supplier, vendor, contractor, or subcontractor providing products and/or services to or on behalf of Signant Health.
- 2.2 For the purposes of this Manual, unless the context requires otherwise:
- 2.2.1 the singular shall include the plural, and vice versa;
- 2.2.2 reference to one gender shall include the other genders; and
- 2.2.3 reference to a natural person shall include a juristic person, and *vice versa*.
- 2.3 Clause headings in this Manual are inserted for convenience only and shall not be taken into account for the purposes of interpreting it.
- 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 release date of this Manual, and as amended, implemented, or substituted from time to time.
3. **INFORMATION REGULATOR**
- 3.1 The Regulator is an independent body responsible for the promotion and protection of the right to privacy as it relates to the protection of personal information and the right of access to information.
- 3.2 Queries can be directed to the Regulator, using the contact details below, or at <https://infoeregulator.org.za/contact-us/>:
- Physical address: Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191
- Postal address: P.O. Box 31533, Braamfontein, Johannesburg, 2017
- Telephone number: 010 023 5200 / 0800 017 160
- Email: [enquiries@infoeregulator.org.za](mailto:enquiries@infoeregulator.org.za)
- Website: <https://infoeregulator.org.za>
- 3.3 A complaint can be lodged with the Regulator by completing and submitting:
- 3.3.1 [Form 05: Complaint Form - PAIA](#) to [PAIAComplaints@infoeregulator.org.za](mailto:PAIAComplaints@infoeregulator.org.za) – should your PAIA request be denied or there is no response from a private body for access to records; or
- 3.3.2 [Form 05: Complaint Form - POPIA](#) to [POPIAComplaints@infoeregulator.org.za](mailto:POPIAComplaints@infoeregulator.org.za) – should you feel that your personal information has been violated.

#### 4. **CONTACT DETAILS**

##### 4.1 **Signant Health**

Registration number: 2026 / 404885 / 07

Postal address: c/o Eversheds Sutherland (SA) Inc  
6<sup>th</sup> Floor, 39 Melrose Boulevard  
Melrose Arch  
Melrose North  
2196

Registered address: c/o Eversheds Sutherland (SA) Inc  
6<sup>th</sup> Floor, 39 Melrose Boulevard  
Melrose Arch  
Melrose North  
2196

Contact number: +1-267-422-1700

Email: [dpo@signanthealth.com](mailto:dpo@signanthealth.com)

Website: <https://signanthealth.com/>

**Information Officer:** Corlee Herbst  
Title: Senior Director  
Contact number: +1-267-422-1700  
Email: [corlee.herbst@signanthealth.com](mailto:corlee.herbst@signanthealth.com)  
Postal address: Signant Health South Africa (Pty) Ltd  
c/o Eversheds Sutherland (SA) Inc  
6<sup>th</sup> Floor, 39 Melrose Boulevard  
Melrose Arch  
Melrose North  
2196

#### 5. **GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE**

- 5.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("**Guide**"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages and in braille.
- 5.2 The aforesaid Guide contains the description of:
- 5.2.1 the objects of PAIA and POPIA;
  - 5.2.2 the postal and street address, phone number, and, if available, electronic mail address of the information officer, and every deputy information officer, of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
  - 5.2.3 the manner and form of a request for access to a record of a public body contemplated in section 11 of PAIA, and access to a record of a private body contemplated in section 50 of PAIA;
  - 5.2.4 the assistance available from the information officer of a public body in terms of PAIA and POPIA;

- 5.2.5 the assistance available from the Regulator in terms of PAIA and POPIA;
  - 5.2.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, and an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
  - 5.2.7 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;
  - 5.2.8 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;
  - 5.2.9 the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
  - 5.2.10 the regulations made in terms of section 92 of PAIA.
- 5.3 Members of the public can inspect or obtain copies of the Guide from Signant Health's registered address, or the office of the Regulator, during normal working hours. A copy of the Guide will be made available at Signant Health's registered address in any official language, on request.
- 5.4 The Guide can also be obtained:
- 5.4.1 upon request to the Information Officer using [Form 01: Request for a Copy of the Guide from an Information Officer](#) (regulation 3);
  - 5.4.2 upon request to the Regulator using [Form 01: Request for a Guide from the Regulator](#) (regulation 2); or
  - 5.4.3 from the website of the Regulator ([PAIA Guides](#)).
6. **RECORDS AVAILABLE IN TERMS OF SECTIONS 51(1)(a)(ii) AND 51(1)(b)(iii) OF PAIA**
- 6.1 To the extent applicable, Signant Health keeps such information and documents as may be required in accordance with, *inter alia*, the following legislation:
- 6.1.1 Compensation for Occupational Injuries and Diseases Act (130 of 1993);
  - 6.1.2 Companies Act (71 of 2008);
  - 6.1.3 Consumer Protection Act (68 of 2008);
  - 6.1.4 Electronic Communications and Transactions Act (25 of 2002);
  - 6.1.5 Financial Intelligence Centre Act (38 of 2001);
  - 6.1.6 Income Tax Act (58 of 1962);
  - 6.1.7 Labour Relations Act (66 of 1995);
  - 6.1.8 Legal Practice Act (28 of 2014);
  - 6.1.9 National Credit Act (34 of 2005);
  - 6.1.10 Occupational Health and Safety Act (85 of 1993);
  - 6.1.11 Protection of Personal Information Act (4 of 2013); and

6.1.12 Value Added Tax Act (89 of 1991).

## **7. RECORDS HELD BY SIGNANT HEALTH IN TERMS OF SECTION 51(1)(b)(iv) OF PAIA**

The following is a non-exclusive list of the subjects on which Signant Health holds records and the categories into which these fall:

### **7.1 Company Secretarial:**

- 7.1.1 Memorandum of Incorporation of Signant Health;
- 7.1.2 minutes and resolutions;
- 7.1.3 records in respect of trademarks, copyright or patents (to the extent registered in the name of Signant Health);
- 7.1.4 certificate of incorporation of Signant Health; and
- 7.1.5 combined company registers.

### **7.2 Financial:**

- 7.2.1 asset register;
- 7.2.2 audit reports;
- 7.2.3 financial records;
- 7.2.4 financial statements;
- 7.2.5 insurance records;
- 7.2.6 management accounts;
- 7.2.7 tax records; and
- 7.2.8 VAT records.

### **7.3 Personnel/Human Resources:**

- 7.3.1 employment contracts;
- 7.3.2 employment equity information;
- 7.3.3 health & safety records;
- 7.3.4 internal policies and procedures;
- 7.3.5 payroll and benefits;
- 7.3.6 records of applicants; and
- 7.3.7 personnel records.

### **7.4 Suppliers and customers:**

- 7.4.1 products and/or services contracts;
- 7.4.2 Supplier and customer contact and business details;

- 7.4.3 Supplier and customer representative contact details;
- 7.4.4 banking and financial information; and
- 7.4.5 information about products and/or services.

**7.5 Clinical trial participants and candidates:**

- 7.5.1 Identity details and documents, and contact details;
- 7.5.2 health, demographic, and personally identifiable information;
- 7.5.3 specific records required for a clinical trial, including images, audio and video recordings; and
- 7.5.4 contracts and consent forms.

**7.6 Health care professionals:**

- 7.6.1 identity and contact details;
- 7.6.2 professional and educational information;
- 7.6.3 specific records required for a clinical trial, including images, audio and video recordings; and
- 7.6.4 consent forms.

**7.7 Technical information:**

- 7.7.1 Internet Protocol (IP) address;
- 7.7.2 browser type and browser language;
- 7.7.3 device type and/or device ID, if the device is provided by a Signant Health Group entity;
- 7.7.4 activity on our website or applications;
- 7.7.5 username, passwords and logs, including timestamps and audit trails, of users of Signant Health software;
- 7.7.6 data collected from cookies or other similar technologies; and
- 7.7.7 geolocation.

**7.8 Public relations:**

- 7.8.1 Signant Health brochures, marketing materials, and publications; and
- 7.8.2 media releases.

**8. INFORMATION AUTOMATICALLY AVAILABLE**

- 8.1 The following categories of records are automatically available for inspection, purchase, or photocopying, and do not need to be requested in terms of PAIA:
  - 8.1.1 newsletters;
  - 8.1.2 booklets;

- 8.1.3 pamphlets/brochures;
- 8.1.4 marketing materials;
- 8.1.5 posters;
- 8.1.6 other literature intended for public viewing; and
- 8.1.7 any other information provided on the Signant Health website, located at <https://signanthealth.com/>.

8.2 The records set out in clause 8.1 can be accessed either through the Signant Health website, or upon request to Signant Health at [dpo@signanthealth.com](mailto:dpo@signanthealth.com).

## 9. **PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA**

- 9.1 Signant Health uses a person's personal information to provide support services to the Signant Health Group (which provides clinical trial technologies and services) and related activities (including marketing communications, where they have requested them), manage its business (including communications with customers, Suppliers, health care professionals, and clinical trial participants and candidates), recruit new staff, comply with its legal obligations, and improve and monitor the performance of its digital platforms.
- 9.2 Signant Health may add a person's personal information to a database used by the Signant Health Group.
- 9.3 Signant Health has measures in place to safeguard a person's personal information when it transfers it outside of South Africa, including data transfer agreements within the Signant Health Group.
- 9.4 Signant Health takes steps to minimise the amount of personal information it holds and to keep it secure.
- 9.5 Signant Health deletes personal information when it no longer needs it, and it has policies in place governing this.
- 9.6 We are happy to answer your questions about any of the above – please send them to [dpo@signanthealth.com](mailto:dpo@signanthealth.com).
- 9.7 For further details about how we process your personal data you can read the applicable privacy policy or notice ("**Privacy Policy**"), including the privacy policy available at <https://signanthealth.com/privacy-policy>.

## 10. **THE PURPOSE OF PROCESSING OF PERSONAL INFORMATION**

- 10.1 We process personal information for a variety of purposes, including but not limited to the following:
  - 10.1.1 to provide or manage any information, products and/or services requested by Signant Health Group entities and/or data subjects;
  - 10.1.2 to help us identify data subjects when they contact Signant Health;
  - 10.1.3 to maintain customer and/or services records;
  - 10.1.4 for recruitment and employment purposes;
  - 10.1.5 for general administration, financial and tax purposes;
  - 10.1.6 for legal, regulatory, or contractual purposes, including contract negotiation and execution;

- 10.1.7 for health and safety purposes;
- 10.1.8 to monitor access, secure and manage our systems;
- 10.1.9 to transact with our Suppliers and business partners;
- 10.1.10 to help us improve the quality of our products and services;
- 10.1.11 to help us recover debts; and
- 10.1.12 to identify other products and services which might be of interest to Signant Health Group entities and/or data subjects and to inform them about our products and services.

10.2 The categories of data subjects and of personal information relating thereto that we process is more fully set out in the applicable Privacy Policy, and includes the following:

|                                                              | Identity and contact information | Other personal data | Visual and audio information | Technical information | Health information | Commercial information | Professional and educational information | Anonymized and/or de-identified data |
|--------------------------------------------------------------|----------------------------------|---------------------|------------------------------|-----------------------|--------------------|------------------------|------------------------------------------|--------------------------------------|
| Clinical trial participants and candidates                   | X                                | X                   | X                            | X                     | X                  |                        |                                          | X                                    |
| Visitors to our websites and locations, senders of inquiries | X                                |                     | X                            | X                     |                    |                        |                                          | X                                    |
| Health care professionals                                    | X                                | X                   | X                            | X                     |                    |                        | X                                        | X                                    |
| Employees, contractors and candidates                        | X                                | X                   | X                            | X                     | X                  | X                      | X                                        | X                                    |
| Customers (sponsors, CROs)                                   | X                                | X                   |                              | X                     |                    |                        |                                          | X                                    |
| Vendors                                                      | X                                |                     |                              | X                     |                    | X                      | X                                        | X                                    |
| Attendees at events                                          | X                                |                     | X                            |                       |                    |                        | X                                        | X                                    |

## 11. SHARING OF PERSONAL INFORMATION

11.1 We do not share the personal information of our data subjects with any third parties, except if:

- 11.1.1 we are obliged to provide such information for legal or regulatory purposes;
- 11.1.2 we are required to do so for purposes of existing or future legal proceedings;
- 11.1.3 we are selling one or more of our businesses to someone to whom we may transfer our rights under any agreement we have with you;
- 11.1.4 they perform services and process personal information on our behalf;
- 11.1.5 this is required to provide or manage any information, products and/or services to Signant Health Group entities and/or data subjects, including to their end customers (responsible parties who sponsor clinical trials) and to healthcare professionals (members of the study team); or
- 11.1.6 needed to help us improve the quality of our products and services.

11.2 Depending on the purpose for sharing personal information, we may share personal information within Signant Health, with other Signant Health Group entities, or with third parties, including Suppliers, third party purchasers of our business, and government authorities.

- 11.3 We will send notifications or communications to data subjects, including clinical trial participants and candidates and other users of Signant Health software, if we are obliged by law, or in terms of our contractual relationship with them or with our customers.
- 11.4 We will only disclose personal information to government authorities if we are required to do so by law.
- 11.5 Our employees, our agencies, and our Suppliers, are required to adhere to data privacy and confidentiality principles and to attend data privacy training.
- 12. **INFORMATION SECURITY MEASURES TO PROTECT PERSONAL INFORMATION**
- 12.1 Signant Health has implemented and shall maintain, and shall take reasonable steps to ensure that its operators implement and maintain, reasonable technical and organisational measures for the protection of personal information processed by them, including to ensure the confidentiality, integrity and availability of the personal information. In terms of POPIA, operators are third parties that process personal information on behalf of Signant Health.
- 12.2 We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss, or destruction. Some of the steps we take include maintaining relevant certifications (ISO 27001 and SOC 2 Type 2), encrypting data in transit and rest, and requiring our employees to regularly undertake data processing and security awareness training.
- 13. **TRANS-BORDER FLOWS OF PERSONAL INFORMATION**
- 13.1 We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only in accordance with South African legislative requirements; or if the data subject consents to the transfer of their personal information to third parties in foreign countries.
- 13.2 We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of POPIA.
- 13.3 We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in clauses 12 and 13.
- 13.4 Personal information may be processed outside of South Africa for the following purposes:
  - 13.4.1 hosting (including through operators or sub-processors) of email servers, file and data servers, accounting systems, HR systems, travel booking systems, helpdesk systems, and translation and similar services in the European Union ("EU"), the United States of America ("USA") and/or in the United Kingdom;
  - 13.4.2 hosting of clinical trial data, which we process on behalf of our customers, on AWS or Microsoft Azure cloud servers in the EU and/or in the USA; and
  - 13.4.3 by Signant Health personnel located in the USA, UK, EU, India, Mexico, Chile, and/or the Philippines, for the performance of their respective roles within the Signant Health Group, including through their use of Signant Health Group provided software.
- 14. **HOW TO REQUEST RECORDS HELD BY SIGNANT HEALTH IN TERMS OF SECTION 53(2) OF PAIA AND 23 OF POPIA**
- 14.1 A data subject may request Signant Health:
  - 14.1.1 to confirm whether or not Signant Health is processing their personal information;

- 14.1.2 for a copy of their personal information; and
- 14.1.3 other supplementary information (for example, how are we using it, who are we sharing it with, and where did we get it from).
- 14.2 Subject to compliance with clause 1.4, a requester may request Signant Health to provide access to any record held by Signant Health.
- 14.3 A data subject and/or requester is only entitled to their own personal information, and not to information relating to other people (unless the information is also about them, or they are acting on behalf of someone).
- 14.4 Requests for access to records:
  - 14.4.1 of personal information held by Signant Health in terms of POPIA must be made by the requester using the form attached hereto as **Annexure A**. Such request must be made by emailing the completed Annexure A to the Information Officer at [dpo@signanthealth.com](mailto:dpo@signanthealth.com) or delivering it to our registered address.
  - 14.4.2 held by Signant Health in terms of PAIA must be made by the requester using the prescribed [Form 02: Request Access to Record](#), accessible under clause 21. Such request must be made by emailing the completed [Form 02: Request Access to Record](#) to the Information Officer at [dpo@signanthealth.com](mailto:dpo@signanthealth.com) or delivering it to our registered address.
- 14.5 Objections to processing of personal information
  - 14.5.1 A data subject may in certain instances object, at any time, to the processing of personal information by Signant Health, on reasonable grounds relating to their particular situation, unless applicable law provides for such processing.
  - 14.5.2 A data subject must complete the prescribed [Form 01: Objection to processing](#), and submit it to the Information Officer at [dpo@signanthealth.com](mailto:dpo@signanthealth.com) or deliver it to our registered address.
- 14.6 Correction or deletion of personal information
  - 14.6.1 A data subject may ask Signant Health to correct or delete personal information in Signant Health's possession or control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully.
  - 14.6.2 A data subject may ask Signant Health to destroy or delete a record of personal information about a data subject where Signant Health is no longer authorised to retain their records in terms of POPIA.
  - 14.6.3 A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at [dpo@signanthealth.com](mailto:dpo@signanthealth.com) or our registered address, on the prescribed [Form 02: Request for Correction or Deletion](#).
- 14.7 In lodging a request, the requester must:
  - 14.7.1 provide sufficient detail on the request form to enable the Information Officer to identify the requested record and the requester;
  - 14.7.2 indicate which form of access is required, and specify a postal address, fax number and/or email address within South Africa;
  - 14.7.3 indicate whether, in addition to a written response, the requester requests to be informed in any other manner and state the necessary particulars to be so informed; and

- 14.7.4 identify the right that the requester is seeking to exercise or protect, and provide an explanation of why the requested record is required for the exercise or protection of such right.
- 14.8 If a request is made on behalf of a person, the requester must then submit proof of the capacity in which the requester is making the request, to the satisfaction of the Information Officer.
- 14.9 The Information Officer, as soon as reasonably possible, but in any event within 30 days, after the request has been received, shall decide whether or not to grant the request and shall notify the requester of its decision.
- 14.10 If the request for access is granted by the Information Officer, Signant Health will specify, in the notice referred to in clause 14.9, the access fee payable (if any) and the form in which access will be given to the requester.
- 14.11 If the Information Officer refuses access, Signant Health will provide adequate reasons for the refusal, based on the provisions of PAIA relied upon (and summarised in clause 15), in the notice referred to in clause 14.9.
- 14.12 The requester may lodge a complaint with the Regulator or an application with a court to challenge Signant Health's decision, or the contents of the notice referred to in clause 14.9, in accordance with the procedure and time period specified in such notice.
15. **GROUNDINGS FOR REFUSAL IN TERMS OF PART 3, CHAPTER 4 OF PAIA**
- 15.1 In terms of PAIA, there are certain grounds upon which Signant Health must or may refuse to grant a requester access to its records, as certain categories of information may be subject to protection in the interests of privacy. Such records which may be protected would include but would not be limited to records containing:
- 15.1.1 privileged information;
- 15.1.2 personal information of a third party who is a natural person;
- 15.1.3 commercial information or trade secrets of a third party;
- 15.1.4 confidential information of a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations, or to prejudice that third party in commercial competition;
- 15.1.5 information that, if disclosed, could endanger the safety of an individual or could impair a party's protection of their property;
- 15.1.6 commercial information relating to the private body in question which would include information regarding trade secrets, financial, commercial, or technical information, the disclosure of which would cause harm to the commercial or financial interests of the body; and
- 15.1.7 research information of a third party or of the private body in question.
16. **RECORDS NOT FOUND OR THAT DO NOT EXIST IN TERMS OF SECTION 55 OF PAIA**
- 16.1 If all reasonable steps have been taken to find a record, and such record cannot be found or if the record does not exist, the Information Officer shall notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.
- 16.2 The affidavit or affirmation shall 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 Information Officer with every person who conducted the search.

- 16.3 The notice, as set out in 16.1, shall be regarded as a decision to refuse a request for access to the record concerned for purposes of PAIA.
- 16.4 If the record in question should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless access is refused by the Information Officer.
- 16.5 The attention of the requester is drawn to the provisions of Part 3, Chapter 4 of PAIA, as set out in clause 15, in terms of which Signant Health must or may refuse, on certain specified grounds, to provide information to a requester.

## **17. INFORMATION REQUESTED ABOUT A THIRD PARTY**

- 17.1 Section 71 of PAIA makes provision for a request for records containing information about a third party.
- 17.2 In considering such a request, Signant Health will adhere to the provisions of sections 71 to 73 of PAIA, as well as the relevant provisions of POPIA.
- 17.3 The attention of the requester is drawn to the provisions of Part 3, Chapter 5 of PAIA, in terms of which Signant Health is required to notify the third party of the request lodged in respect of information applicable to or concerning such third party. Within 21 days of being informed, the third party has an opportunity to grant his, her or its consent to the disclosure of the record, or to make representations (written or oral) as to why the requested record should not be disclosed to the requester. Signant Health will notify the affected third party and the requester of its decision to grant or refuse the request for access to the records. In addition, the provisions of Part 4, Chapter 2 of PAIA entitles the third party to dispute the decision of the Information Officer by referring the matter to the High Court once all internal appeal procedures have been exhausted by the third party. The High Court will then determine whether or not the record should have been disclosed by Signant Health.

## **18. UPDATING THE MANUAL**

Signant Health may update this Manual at such intervals as may be necessary.

## **19. AVAILABILITY OF THIS MANUAL IN TERMS OF SECTION 51(3) OF PAIA**

- 19.1 This Manual is available for inspection, during normal business hours on prior arrangement with the Information Officer, at the registered address of Signant Health.
- 19.2 Copies of this Manual will be made available to any person upon request, subject to the prescribed fees as applicable, at the registered address of Signant Health or electronically, and to the Regulator upon request.
- 19.3 This Manual can also be accessed on the website of Signant Health at [www.signanthealth.com](http://www.signanthealth.com).

## **20. PRESCRIBED FEES**

- 20.1 Signant Health is entitled, under both POPIA and PAIA, to require a requester to pay a prescribed fee in order to provide access to, and copies of, records. Upon receipt of a request for records, as described in clause 14, the Information Officer will by notice require the requester to pay the prescribed request fee (if any), before further processing the request.
- 20.2 If, in the opinion of the Information Officer, the search for a record in respect of a request made and the preparation of the record for disclosure would require more than six hours for these purposes, the Information Officer may, in accordance with [Form 3: Outcome of Request and Fees Payable](#), require the requester to pay, as a deposit, a portion of the access fee as prescribed. The Information Officer may withhold a record until the requester concerned has paid the applicable fees.

- 20.3 Confirmation as to whether or not Signant Health is processing a data subject's personal information will be made free of charge.

## 21. FORMS

The ensuing forms, as provided by the Regulator, can be accessed at the following links:

### 21.1 PAIA

- 21.1.1 [Form 01: Request for a Guide from the Regulator](https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form01-Reg2.pdf) (regulation 2) - <https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form01-Reg2.pdf>;
- 21.1.2 [Form 01: Request for a Copy of the Guide from an Information Officer](https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form01-Reg3.pdf) (regulation 3) - <https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form01-Reg3.pdf>;
- 21.1.3 [Form 02: Request for Access to Record](https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf) (regulation 7) - <https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>;
- 21.1.4 [Form 03: Outcome of Request and of Fees Payable](https://infoeregulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf) (regulation 8) - <https://infoeregulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>;
- 21.1.5 [Form 05: Complaint Form - PAIA](https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf) (regulation 10) - <https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf>;
- 21.1.6 General - <https://infoeregulator.org.za/paia/>.

### 21.2 POPIA

- 21.2.1 [Form 01: Objection to processing](https://infoeregulator.org.za/wp-content/uploads/2020/07/FORM-1-OBJECTION-TO-THE-PROCESSING-OF-PERSONAL-INFORMATION.pdf) (regulation 2(1)) - <https://infoeregulator.org.za/wp-content/uploads/2020/07/FORM-1-OBJECTION-TO-THE-PROCESSING-OF-PERSONAL-INFORMATION.pdf>;
- 21.2.2 [Form 02: Request for Correction or Deletion](https://infoeregulator.org.za/wp-content/uploads/2020/07/FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-PERSONAL-INFORMATION-OR.pdf) (regulation 3(2)) - <https://infoeregulator.org.za/wp-content/uploads/2020/07/FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-PERSONAL-INFORMATION-OR.pdf>;
- 21.2.3 [Form 05: Complaint Form - POPIA](https://infoeregulator.org.za/wp-content/uploads/2020/07/FORM-5-COMPLAINT-REGARDING-INTERFERENCE-WITH-THE-PROTECTION-OF-AN-ADJUDICATOR.pdf) (regulation 7) - <https://infoeregulator.org.za/wp-content/uploads/2020/07/FORM-5-COMPLAINT-REGARDING-INTERFERENCE-WITH-THE-PROTECTION-OF-AN-ADJUDICATOR.pdf>;
- 21.2.4 General - <https://infoeregulator.org.za/popia/>.

## 22. REMEDIES

Signant Health does not have internal appeal procedures regarding PAIA and POPIA requests. As such, the decision made by the duly authorised persons is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Regulator, for relief.

**Issued on 21 September 2026 by:**

  
Signatory Name: Corlee Herbst  
Username: corlee.herbst@signanthealth.com  
Signing Time: Sep 21, 2026, 03:15:11:386 p.m. (UTC)  
Signing Reason: I read and approve this document  
**Corlee Herbst / Information Officer**

**Annexure A**  
**Right of Access Request Form**

Under section 23 of the Protection of Personal Information Act (4 of 2013) ("**POPIA**"), you have a right to (i) request Signant Health to confirm whether or not it holds personal information about you; and (ii) request a copy of the record or a description of the personal information Signant Health holds about you, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.

Signant Health could hold personal information in a number of different areas. Completing this form will help us to locate the information you are seeking and deal with your request as quickly as possible.

**1 Part 1 – About yourself**

|                                      |  |
|--------------------------------------|--|
| <b>SURNAME:</b>                      |  |
| <b>FIRST NAME(S):</b>                |  |
| <b>ALTERNATIVE NAMES:</b>            |  |
| <b>IDENTITY NUMBER:</b>              |  |
| <b>DATE OF BIRTH:</b>                |  |
| <b>CURRENT ADDRESS:</b>              |  |
| <b>PHONE NUMBER:</b>                 |  |
| <b>EMAIL ADDRESS:</b>                |  |
| <b>RELATIONSHIP TO DATA SUBJECT:</b> |  |

**2 Part 2 – Are you requesting information about yourself?**

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>IF YES:</b> | Please go to Part 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>IF NO</b>   | <p>Please go to Part 3.</p> <p>If you are making the request on behalf of another person you <b>must</b> enclose with the request a signed authority from them to do so. If you are making the application because the data subject lacks capacity to make the application in their own right, please outline your authority to make the application in their stead (for example, Power of Attorney). You should enclose a copy of any evidence that you may have of that authority. The Information Officer of Signant Health will contact you if further evidence is required.</p> |

### 3 Part 3 – Details of the Data Subject (if requesting information on behalf of someone else)

|                                                |  |
|------------------------------------------------|--|
| If requesting information about an individual: |  |
| <b>SURNAME:</b>                                |  |
| <b>FIRST NAME(S):</b>                          |  |
| <b>ALTERNATIVE NAMES:</b>                      |  |
| <b>IDENTITY NUMBER:</b>                        |  |
| <b>DATE OF BIRTH:</b>                          |  |
| <b>CURRENT ADDRESS:</b>                        |  |
| <b>PHONE NUMBER:</b>                           |  |
| <b>EMAIL ADDRESS:</b>                          |  |

|                                                                                                                                            |  |
|--------------------------------------------------------------------------------------------------------------------------------------------|--|
| If requesting information about a juristic person:                                                                                         |  |
| <b>NAME OF ENTITY:</b>                                                                                                                     |  |
| <b>ALTERNATIVE NAMES:</b><br>(For example, if the entity trades under a name different to its registered name or it has changed its name.) |  |
| <b>REGISTRATION NUMBER:</b>                                                                                                                |  |
| <b>REGISTERED ADDRESS:</b>                                                                                                                 |  |
| <b>PRINCIPAL PLACE OF BUSINESS:</b>                                                                                                        |  |

### 4 Part 4 - Locating your personal information

In order for us to be able to locate the information you are seeking, please provide some details, if known, as to where you feel information is held about you. If you would like to provide any further information that you feel would be helpful in locating your personal information, please provide this in the box named Additional Information.

|                                                                                                                                                                                                                                        |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <b>DESCRIBE THE INFORMATION YOU ARE REQUESTING:</b><br>(If you are only seeking certain records, it would be helpful for us to know which types of record you are seeking, any time period to cover, and if you would like to see only |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

|                                                                                       |  |
|---------------------------------------------------------------------------------------|--|
| specific document(s).<br>Please describe these with<br>as much detail as you<br>can.) |  |
| <b>DATES OF CONTACT:</b><br>(approximately)                                           |  |
| <b>ADDITIONAL<br/>INFORMATION:</b>                                                    |  |

## 5 **Part 5 – Confirming your identity**

We may ask for identification to confirm who you are.

It would therefore be helpful if, at the outset, you could provide, for identification purposes, a copy of any one of the documents listed below.

- Certified copy of current identity document
- Certified copy of current passport

## 6 **Part 6 - Declaration**

Please read the following declaration carefully and sign and date it.

I, the undersigned, \_\_\_\_\_ *[insert full names]*,  
certify that the information provided on this application to Signant Health is true and correct. I  
understand that it is necessary for Signant Health to confirm the data subject's identity, and  
that it may be necessary for Signant Health to request more details from me to be able to locate  
the correct information.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Please return the completed form and supporting documents to the Information Officer by email at [dpo@signanthealth.com](mailto:dpo@signanthealth.com) or deliver it to our registered address.