PAIA MANUAL & POPIA INFORMATION

Dr Rufus Nortjé & Associates

Prepared under section 51 of the Promotion of Access to Information Act 2 of 2000, incorporating the descriptions required by the Protection of Personal Information Act 4 of 2013.

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1. Practice and Information Officer details

Particular	Details
Private body / responsible party	Dr Rufus Nortjé, sole proprietor trading as Dr Rufus Nortjé & Associates
Practice Principal / head	Dr Rufus Nortjé | rufus@medicaljunction.co.za
Information Officer	Friedel van Wyk Nortjé, Practice Manager | friedel@medicaljunction.co.za
Deputy Information Officer	Venessa Springbok | contact via enquiries@medicaljunction.co.za
Regulator registration	Organisation registration 2026-068157; registration date 1 October 2026; certificate issued 4 October 2026
Telephone / general email	012 004 0441 | enquiries@medicaljunction.co.za
Physical and service address	Office 61, Zambezi Junction Shopping Centre, 522 Breed Street, Montana Park, Pretoria, Gauteng, 0182
Postal address (same as physical)	Office 61, Zambezi Junction Shopping Centre, 522 Breed Street, Montana Park, Pretoria, Gauteng, 0182
Fax	No dedicated fax number is published; use the contact details above or ask for assistance.

Access requests, privacy requests and complaints should be addressed to the Information Officer. If unavailable, reception must direct them promptly to the Deputy Information Officer or Practice Principal.

2. Purpose of this manual

This public manual identifies records held by the Practice, explains when records are accessible without a formal request and how to request other records, identifies the Information Regulator's Guide, and describes our processing of personal information. A category listed here is not automatically publicly accessible; statutory confidentiality and other protections still apply.

Scope of this manual: It applies only to Dr Rufus Nortjé & Associates and information for which this general medical practice is responsible. Other independently operated practitioners, businesses and tenants at the same premises are separate entities responsible for their own records and PAIA/POPIA compliance. This manual does not cover their records or activities.

3. PAIA Guide and records available without formal application

The Information Regulator's PAIA Guide explains access rights, processes, prescribed forms, fees and remedies. It is available free from www.inforegulator.org.za and may be inspected or requested through our Information Officer. The Practice can assist with a copy of the Guide in a suitable available language.

Public information normally obtainable directly includes the current PAIA manual, this Practice's privacy policy, blank registration/privacy forms, practice contact details and general appointment information. Routine clinical documents can be requested through the usual verified clinical process. No general entitlement to another person's clinical or personnel record is created.

4. Categories of records held

Subject	Typical records
Clinical and patient records	Individual Practice Perfect patient files: consultations, diagnoses, results, prescriptions, referrals, letters, signed forms, clinical correspondence and relevant audit records.
Appointments, accounts and schemes	ELLE appointments/diaries, family or medical-aid account information, individual beneficiaries, claims, statements, receipts, payments and remittances.
Communication and IT	Practice email, correspondence, enquiries, recorded calls/call logs where available, authorised access records, provider support records.
Personnel and professionals	Employment, contractor and practitioner records, qualifications, registrations, contracts, remuneration, payroll, leave and relevant correspondence.
Business and regulatory	Financial/tax information, insurance, premises and supplier contracts, statutory and professional records, security, privacy complaints, incident reports and policy/approval evidence.

5. Records held under other legislation

The Practice may be required to maintain records under the National Health Act, Health Professions Act and applicable professional rules; Medical Schemes Act; Medicines and Related Substances Act; Basic Conditions of Employment Act, Labour Relations Act and applicable employment legislation; Income Tax Act, Tax Administration Act and VAT Act; Electronic Communications and Transactions Act; and PAIA and POPIA. Access to such records remains subject to the relevant legislation and confidentiality protections.

6. How to request access

6.1 Routine clinical information and your own information

You may request existing prescriptions, results or letters from reception or the relevant doctor, subject to identity verification and appropriate clinical authorisation. Formal PAIA paperwork is not required for every routine request. Under POPIA section 23 you may ask **free of charge** whether the Practice holds your personal information and request access to it or a description of it, subject to lawful limitations and any applicable disclosed fee. An unpaid account does not justify withholding access to a record you are legally entitled to receive.

6.2 Formal PAIA request

1. Complete **PAIA Form 2 (Request for Access to Record)**, available from the Information Officer or the Information Regulator. Send it to friedel@medicaljunction.co.za or deliver it to the Practice.
2. Identify the record or relevant period, contact details, your preferred method of access and, for a request to a private body under PAIA, the right to be exercised or protected and why the record is required.
3. Provide reasonable identity verification. If you represent another person, provide evidence of legal authority; a shared account, family relationship or payment responsibility does not by itself authorise access to that person's clinical information.
4. The Information Officer evaluates access, statutory third-party consultation, applicable fees, any necessary partial disclosure and the lawful outcome. PAIA Form 3 communicates the decision and fees.

6.3 Response time and decisions

A PAIA access decision is ordinarily due **within 30 days** of a formal request. One extension of up to 30 further days is permitted only where PAIA allows it, with the required notice before the original deadline. Silence after the statutory time limit may constitute a deemed refusal. Grounds for refusal may include third-party privacy, professional confidence, legal privilege, safety or protected business interests; lawful partial disclosure must be considered. Special procedures apply to certain health information where release could cause serious harm.

7. Prescribed fees (private bodies)

The following amounts reflect the Information Regulator's **March 2026** fee schedule. A POPIA request for confirmation that information is held is free; any formal PAIA or reproduction fee is assessed under the law and communicated before payment.

Item	Amount / treatment
Formal PAIA request fee	R140.00, where applicable.
Black-and-white A4 printed/photocopy	R2.00 per page or part.
Computer-readable copy: requester's flash drive or CD	R40.00; CD supplied by the Practice: R60.00.
Transcription of audio	R24.00 per A4 page.
Audio copy on flash drive or CD	R40.00 if medium supplied by requester; R60.00 for Practice-supplied CD.
Transcription/copy of visual images	Reasonable quoted outsourced service cost.
Search/preparation after the first hour	R145.00 per hour or part, capped at R435.00.
Deposit if search exceeds six hours	One-third of the applicable reproduction fee items, where PAIA permits.
Postage or electronic transfer	Actual cost, if any.

A fee estimate, deposit request and appropriate statutory notices will be provided where applicable. Public inspection of this manual and access to the Regulator's Guide are free.

8. Refusals, review and remedies

This private practice does not have a PAIA internal-appeal mechanism. A requester or affected third party may complain to the Information Regulator, normally using **PAIA Form 5**, or seek court relief subject to PAIA's procedures and time limits. Complaints generally should be pursued within 180 days of the relevant decision or deemed refusal, subject to statutory provisions for late complaints or particular third-party situations. Asking us to reconsider does not suspend statutory periods.

9. POPIA processing of personal information

9.1 People, information and purposes

People	Information and reasons
Patients, including children	Identity/contact data; medical history, consultations, diagnosis and treatment; results, prescription/referrals; correspondence; consent/preferences; scheme and billing details — for safe healthcare and appropriate administration.
Representatives, family and account payers	Identity/contact, relationship or authority, billing details and relevant communications — to verify contact, authority, billing and lawful communication.
Staff, doctors, contractors	Identity/contact, employment/contract, qualifications, registration, remuneration, payroll/tax and access information — for engagement, safety, administration and legal obligations.
Suppliers, business contacts and enquirers	Contact, contract, tax/payment, enquiries and service correspondence — for operations, security, lawful records and communications.

Information is generally obtained from the person, their authorised representative, treating professionals, laboratories, radiology providers, pharmacies, medical schemes or lawful business sources. The Practice uses the information for care, continuity, appointments, accounts and claims, lawful administration, quality/safety review, investigation of legitimate concerns and compliance obligations. We do not authorise unrelated marketing merely by registering a patient.

9.2 Lawful bases and health confidentiality

POPIA permits lawful processing on more than one basis, including valid consent, contractual necessity, legal duties and applicable legitimate interests under section 11. Special health information is subject to POPIA sections 26–33, including the healthcare authorisation in section 32 for necessary treatment and practice administration. Children's information also requires an applicable authorisation under section 35, with appropriate attention to their own healthcare and confidentiality rights. Medical and professional confidentiality obligations remain applicable independently of POPIA.

The **new Form A and Form B process commencing 16 October 2026** records each attending patient's individual privacy information, communication preferences and specific permissions as relevant. A shared ELLE medical-aid/family account does not authorise the main member to access another adult's clinical file. Each person has a separate Practice Perfect clinical record, even where a family account number is shared. Signing is not blanket permission for unlimited access or disclosure; declining an optional preference does not by itself prevent necessary medical care or lawful recordkeeping.

10. Recipients and international processing

10.1 Recipients

Only necessary information may be shared with authorised practice doctors and staff; other treating healthcare professionals, laboratories, pharmacies and hospitals; medical schemes and administrators for lawful claims; appointed accountant/payroll and professional advisers where justified; and authorised hosted-system, backup, email and IT-support providers. Disclosure to insurers, employers, lawyers or family members requires appropriate authority or another applicable legal ground. The Practice Manager/Information Officer has authorised administrative communication responsibilities but no routine direct Practice Perfect clinical-file login.

10.2 Verified storage locations, overseas processing and open items

Practice Perfect/CIS: Practice Perfect clinical records and the CIS/Redstor backup services have been described by the suppliers as hosted in South Africa. ELLE Health: ELLE confirms its primary patient/appointment and billing database is hosted on Microsoft Azure in Johannesburg, with backups in Johannesburg and Cape Town; standby application servers use Amazon Web Services in Cape Town. ELLE uses South African providers for medical-scheme switching and SMS delivery.

ELLE email delivery / Twilio SendGrid: ELLE reports that emails generated by its system are routed through the international SendGrid service. Their content may include names and addresses, appointment information, account/claim details, prescriptions, relevant clinical information and attached documents. SendGrid uses infrastructure and service providers in the United States and European Union; not every message necessarily follows the same route. ELLE reports that password protection for relevant PDFs is enabled for this Practice, but the sender can change this setting for a particular email and it does not protect the email subject or body. Transmission is encrypted between ELLE and SendGrid; onward TLS delivery depends on the receiving system and is not guaranteed end-to-end encryption. SendGrid may retain message content temporarily and process delivery, opening and link-click information, subject to its published retention practices. ELLE refers to Twilio contractual data-protection safeguards; the Practice continues to review how the supplier and onward-transfer terms apply to our processing.

Microsoft 365 / Outlook: A Microsoft 365 Data Location report obtained for this Practice on 16 October 2026 shows Exchange Online, SharePoint, OneDrive and Teams with South Africa as both current and committed geography for their in-scope data at rest. Exchange Online Protection (the email filtering and security service) lists Europe as its current geography and "No Commitment" as its committed geography. Microsoft publishes Product Terms and a Data Protection Addendum. These storage locations do not mean every support activity or communication remains in South Africa. Atlas ICT provides authorised IT and remote support (including TeamViewer), but the complete geography of Atlas/remote-support processing and some tenant-specific security settings still require verification.

Where personal information is transferred to another country, the Practice assesses the applicable grounds and safeguards under POPIA section 72, including the protection of health information and onward processing. The Information Officer maintains the supplier register and supporting correspondence, and records matters requiring additional verification. Unresolved supplier questions are followed up; they do not justify claiming that there is no international processing or that every safeguard has been independently confirmed.

11. Safeguards, retention and privacy rights

The Practice uses individual user accounts, confidentiality obligations, role-based restrictions, protected devices and networks, appropriate storage and supplier-managed security and backups. These arrangements are reviewed against actual risks; no security measure is represented as infallible. Relevant paper documents are checked before secure storage or disposal. Clinical records are retained according to healthcare and legal requirements, with records preserved when needed for a complaint, request, investigation or legal proceedings. Call recordings may be held for a limited operational period and preserved longer when lawfully necessary.

After identity verification, you may request access, seek correction of inaccurate information, object on legally recognised grounds, request deletion or destruction where retention is no longer lawful, or discuss restrictions. We accept requests through accessible channels, including in person, by email or by telephone where appropriate. The **2025 POPIA amendments** recognise further accessible submission methods for objections and corrections and require telephonic objections/correction requests to be appropriately recorded. The Information Officer will help you use POPIA Form 1 (objection) or Form 2 (correction/deletion), or a substantially similar request.

Patients may complain to the Information Officer and may also use the Information Regulator's POPIA Form 5 or the Regulator's complaint portal. The Practice assesses suspected unauthorised access and makes any legally required notification under POPIA section 22. Clinical records cannot be erased simply because treatment or billing has ended when a lawful retention basis remains.

12. Availability, regulator details and document review

This PAIA manual is available for free inspection at the Practice during normal business hours and as a downloadable public document on the Practice website once posted. It may be requested from the Information Officer and provided to the Information Regulator when required. This edition replaces earlier issued practice manuals from its actual date of issue; historic documents are retained with their original dates.

Information Regulator (South Africa)	Current details
Website and online services	www.inforegulator.org.za | https://eservices.inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za | 010 023 5200
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Postal address	PO Box 31533, Braamfontein, Johannesburg, 2017

Legal and professional sources

- Promotion of Access to Information Act 2 of 2000 (PAIA), sections 50–78 and section 51, as amended; PAIA Regulations, 2021 (GN R757; GG 45057).
- Information Regulator, PAIA Fee Structure and Exemptions, March 2026: https://inforegulator.org.za/wp-content/uploads/2026/03/PAIA-Fees-structure.pdf
- Protection of Personal Information Act 4 of 2013 (POPIA), particularly sections 11, 14, 18–25, 26–35, 55–57, 69 and 72.
- Amendment of POPIA Regulations, GN 6126 (GG 52523), 17 April 2025, and revised regulations: https://inforegulator.org.za/wp-content/uploads/2025/04/POPIA-2021-Regulations-FINAL-21-Jan-2025.pdf
- Regulations Relating to Processing of Data Subjects' Health Information by Certain Responsible Parties, GN 7198 (GG 54268), 6 March 2026 (scope includes medical schemes/administrators, insurers, employers and certain bodies; not GP practices merely because they provide treatment): https://www.gov.za/sites/default/files/gcis_document/202603/54268gon7198.pdf
- National Health Act 61 of 2003, especially sections 13–17; Children's Act 38 of 2005, including section 129, as applicable; Electronic Communications and Transactions Act 25 of 2002.
- HPCSA ethical guidelines including Confidentiality (Booklet 5), Patient Records (Booklet 9), Informed Consent (Booklet 4), Social Media (Booklet 16) and AI in Healthcare (Booklet 20, November 2025). https://www.hpcsa-blogs.co.za/new-and-updated-ethical-guidelines/
- Information Regulator PAIA manuals and eServices: https://eservices.inforegulator.org.za/paiamanuals/default.aspx