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PAIA MANUAL

In terms of The Promotion of Access to Information Act 2 of 2000:

(Herein referred the as “the Act”)

In RE:

BUI MEDICAL AND TECHNOLOGY SUPPLIERS (PTY) LTD AND ITS AFFILIATED COMPANIES

Registration Number: 1998/021857/07

(Hereinafter referred to as the “Company”)

Legal Division

Revision 4: Updated

Effective Date : May 2011

Last Revision Date: September 2025

CONTENT

1.	INTRODUCTION	4
2.	COMPANY CONTACT DETAILS: SECTION 51(1)(B)	4
3.	THE ACT: SECTION 51(1)(B)	4
4.	S52(2) NOTICE: SECTION 51 (1) (C)	5
5.	APPLICABLE LEGISLATION: SECTION (1)(D)	5
6.	SCHEDULE OF RECORDS HELD BY THE COMPANY: SECTION 51 (1) (E)	6
7.	PROCEDURE TO FOLLOW WHEN SUBMITTING A REQUEST FOR ACCESS: SECTION 53(1)	8
8.	PRESCRIBED FEES: SECTION 51 (1) (E).....	8
9.	REMEDIES AVAILABLE TO REQUESTERS IF THEIR REQUEST FOR INFORMATION HAS BEEN REFUSED	9
10.	PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY THE COMPANY	9
11.	PURPOSE OF THE PROCESSING	10
12.	CATEGORIES OF DATA SUBJECT	10
13.	RECIPIENTS OF PERSONAL INFORMATION	11
14.	CROSS-BORDER FLOWS OF PERSONAL INFORMATION.....	11
15.	DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED	12
16.	OBJECTION TO THE PROCESSING	12
17.	REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION	13
18.	REQUEST TO ACCESS RECORD	13
19.	OUTCOME OF REQUEST AND OF FEES PAYABLE	13
20.	ACCEPTANCE.....	13

BUI GROUP

DIRECTORS: A. Sharp, R. Roseveare, W. Malan

SIGNOFF SHEET

AUTHORS/CONTRIBUTORS

Author(s)	Position	Email	Contact Number
Valencia Naidoo	BUI Group Legal	valencian@bui.co	0835814023

CHANGE RECORD

Date	Author(s)	Version	Change Reference
24.11.2023	Valencia Naidoo	V1	PAIA Compilation
22.07.2024	Valencia Naidoo	V1.1	Legal Review
08.09.2025	Moeketsi Masilo	V1.2	Minor changes to section 7

REVIEWS

Date	Reviewer(s)	Version	Change Reference
29.07.2024	Moeketsi Masilo	V1.1	Compliance Review
08.09.2025	Valencia Naidoo	V1.2	Legal Review

BUI GROUP

DIRECTORS: A. Sharp, R. Roseveare, W. Malan

1. INTRODUCTION

The Company is a non-trading holding company for various entities and subsidiaries that form part of the BUI Group.

This PAIA Manual applies to all wholly owned subsidiaries of the Company.

2. COMPANY CONTACT DETAILS: SECTION 51(1)(B)

BUI Group Chief Executive Officer	Ryan Roseveare
BUI Group Risk and Compliance	Mr Dhiren Boodhia
BUI Group Legal	Ms. Valencia Naidoo
Postal Address	P.O Box 76014, Wendywood, 2144
Street Address	3012 Winnie Mandela Drive, Bryanston, Sandton, 2191
Telephone Number	(+27)87 740 2400
E-mail	ryanr@bui.co.za , dhiren@bui.co.za ; valencian@bui.co

Contact details of directors may be requested by submitting a written request for such details to legal@bui.co.za.

3. THE ACT: SECTION 51(1)(B)

- 3.1. The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights that the requester may have. If a public body lodges a request, the public body must be acting in the public interest.
- 3.2. Requests in terms of the Act shall be made in accordance with the prescribed procedures and be subject to the prescribed rates. The forms and the applicable tariff is dealt with in paragraphs 6 and 7 of the Act.
- 3.3. Requesters are referred to the PAIA Guide compiled by the South African Human Rights Commission. Section 10 of the PAIA Guide will contain information for the purpose of exercising Constitutional Rights. The PAIA Guide is available from the South African Human Rights Commission.
- 3.4. The contact details of the South African Human Rights Commission are as follows:

Postal Address : Private Bag 2700, Houghton,
Johannesburg, 2041

Telephone Number : (+27)11 877 3600

Fax Number : (+27)11 403 0625

Website : www.sahrc.org.za

BUI GROUP

DIRECTORS: A. Sharp, R. Roseveare, W. Malan

4. S52(2) NOTICE: SECTION 51 (1) (C)

At date of signature of this manual no notices relevant to the Company have been published by the Minister of Justice and Constitutional Development under section 52(2) of the Act.

5. APPLICABLE LEGISLATION: SECTION (1)(D)

No.	act	Reference
1.	Basic condition of employment act	No. 75 of 1997
2.	Companies act	No. 61 of 1973
3.	Compensation of occupational injuries and diseases act	No. 103 of 1993
4.	Copyrights act	No. 98 of 1978
5.	Electronic communications and transactions act	No. 25 of 2002
6.	Employment equity act	No. 55 of 1998
7.	Income tax act	No.95 of 1967
8.	Labour relations act	No. 66 of 1995
9.	National environmental management act	No. 107 of 1998
10.	Promotion of access of information act	No. 2 of 2000
11.	Protection of personal information act	No. 4 of 2013
12.	Public holiday act	No. 36 of 1994
13.	Unemployment insurance act	No. 30 of 1996
14.	Value added tax act	No. 89 of 1991

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6. SCHEDULE OF RECORDS HELD BY THE COMPANY: SECTION 51 (1) (E)

Record	Subject	Availability
Company act record	1. Documents of Incorporation 2. Share certificate 3. Company registration documents	Request in terms of PAIA
Financial records	1. Finance statements 2. Financial and tax records (company and employees) 3. Banking records 4. Accounting records 5. Rental agreements 6. Invoices	Request in terms of PAIA
Income tax records	1. PAYE records 2. Documents issued to employees for income tax purposes 3. Records of payment made to SARS on behalf of employees 4. All other statutory documents related to: A. VAT B. UIF C. Workman's compensation	Request in terms of PAIA
Personal documentation and records	1. Employment contracts 2. Employment equity plan 3. Medical records 4. Retirement annuity records	Request in terms of PAIA

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	5. Disciplinary 6. Records salary 7. Records disciplinary 8. Code 9. Leave records 10. Training records	
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7. PROCEDURE TO FOLLOW WHEN SUBMITTING A REQUEST FOR ACCESS: SECTION 53(1)

- 7.1. The requester must complete Form 2 and submit this form together with the required fee, to the BUI Group Risk and Compliance and/or BUI Group Legal;
- 7.2. The form must be submitted to the Head of Group Risk and Compliance and/or Head of Group Legal of the Company at the street address and via the electronic mail addresses, as outlined in clause 2 above;
- 7.3. The form must provide sufficient particulars to enable the BUI Group Risk and Compliance and/or BUI Group Legal of the Company to identify the record(s) requested and to identify the requester;
- 7.4. The requester must:
 - 7.4.1. indicate which form of access is required;
 - 7.4.2. specify his/her postal address or fax number which must be in the Republic of South Africa;
 - 7.4.3. identify the right that the requester is seeking to exercise or protect, and provide
 - 7.4.4. an explanation of why the requested record is required for the exercise or protection of that right;
 - 7.4.5. If, in addition to a written reply, the requester wishes to be informed of the decision on the request in any other manner, the requester must state that manner and the necessary particulars to be informed in such other manner;
 - 7.4.6. If the request is made on behalf of another person, proof of the capacity in which the requester is making the request, must be submitted and this is subject to the reasonable satisfaction of the Head of Group Risk and Compliance and/or Head of Group Legal of the Company.

8. PRESCRIBED FEES: SECTION 51 (1) (E)

- 8.1. The following applies to requests that are not personal requests (a personal request is where a requester seeks information about himself or herself or his/her next of kin. Personal requests are exempted from paying fees. In addition, if the information is about a deceased individual, then the requester will also be exempted from paying fees.
- 8.2. Every other request which is not a personal request is subject to payment of the prescribed fees set out in section 51(1)(f) of the Act ("the Fees"). The access fee of R50.00 must be paid before a request will be processed. The Fees must be paid to the Company by way of electronic funds transfer into the Company's bank account, the details of which are available on request.
- 8.3. Please note that proof of payment must be submitted to the following email addresses:
 - 8.3.1. dhirenb@bui.co.za ; valencian@bui.co.
- 8.4. If the preparation of the requested record(s) requires more than the prescribed hours (six hours), a deposit shall be paid equal to not more than one third of the Fees which would be payable if the request were granted ("the Deposit").
- 8.5. Should the Company fail to provide the requester record(s) after approving the request, a requester may lodge an application to court against the payment of the Fee and/or the Deposit.

BUI GROUP

DIRECTORS: A. Sharp, R. Roseveare, W. Malan

- 8.6. Records may be withheld until the Fees and/or Deposit have been paid.
- 8.7. The Fees structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za.

9. REMEDIES AVAILABLE TO REQUESTERS IF THEIR REQUEST FOR INFORMATION HAS BEEN REFUSED

- 9.1. The Act provides for an internal appeal procedure in terms of sections 74 and 75 of the Act. The Minister, as defined in the Act, is the relevant authority to review any decision taken on appeal.
- 9.2. An aggrieved party still has an opportunity to approach the courts if dissatisfied with the decision of the relevant authority.

10. PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY THE COMPANY

- 10.1. Chapter 3 of the Protection of Personal Information Act (hereinafter referred to as "POPI") provides for the minimum Conditions for lawful Processing of Personal Information by a Responsible Party. These Conditions may not be derogated from unless specific exclusions apply as outlined in POPI. Below is a description of the eight Conditions for Lawful Processing as contained in POPI, of which The Company ensures adherence:
- 10.1.1. Accountability - the Responsible Party has an obligation to ensure that there is compliance with POPI in respect of the processing of Personal Information.
- 10.1.2. Processing limitation - Personal Information must be collected directly from a Data Subject to the extent applicable; must only be processed with the consent of the Data Subject and must only be used for the purposes for which it was obtained.
- 10.1.3. Purpose specification - Personal Information must only be processed for the specific purpose for which it was obtained and must not be retained for any longer than it is needed to achieve such purpose.
- 10.1.4. Further processing limitation - further processing of Personal Information must be compatible with the initial purpose for which the information was collected.
- 10.1.5. Information quality - the Responsible Party must ensure that Personal Information held is accurate and updated regularly and that the integrity of the information is maintained by appropriate security measures.
- 10.1.6. Openness there must be transparency between the Data Subject and the Responsible Party. Security safeguards-a Responsible Party must take reasonable steps to ensure that adequate safeguards are in place to ensure that Personal Information is being processed responsibly and is not unlawfully accessed.
- 10.1.7. Data Subject participation - the Data Subject must be made aware that their information is being processed and must have provided their informed consent to such processing.

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DIRECTORS: A. Sharp, R. Roseveare, W. Malan

11. PURPOSE OF THE PROCESSING

11.1. Personal Information may only be Processed for a specific purpose. The Company uses personal information under its care in the following manner:

- 11.1.1. Administration;
- 11.1.2. Rendering services according to contractual agreements;
- 11.1.3. Staff administration;
- 11.1.4. Complying with Tax laws;
- 11.1.5. Keeping accounts of records.

12. CATEGORIES OF DATA SUBJECT

As per section 1 of POPI, a Data Subject may either be a natural or a juristic person. The table below sets out the various categories of Data Subjects that the Company processes.

The Company may process records relating to:

Data subject	Information processed
Clients — Natural Persons	Names, contact details, postal address, date of birth, ID number, Tax related information, nationality, gender, confidential correspondence
Clients —Juristic Persons / Entities	Names of contact persons, Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding documents, Tax related information, authorised signatories, Employee details (name, email, address, contact number)
Service Providers	Names of contact persons; Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding document, Tax related information, authorised signatories, beneficiaries, ultimate beneficial owners
Vendors	Names of contact persons; Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding document, Tax related information, authorised signatories, beneficiaries, ultimate beneficial owners

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DIRECTORS: A. Sharp, R. Roseveare, W.Malan

Employees / Directors	Gender, Pregnancy, Marital Status, Ethnicity, Age, Language, Education information, Financial Information, Employment History, ID number, Physical and Postal address, Contact details, Criminal behaviour and history, Well-being
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13. RECIPIENTS OF PERSONAL INFORMATION

- 13.1. The below mentioned outlines the recipients to whom the Company may provide a Data Subjects Personal Information to:
- 13.1.1. Any firm, organisation or person that the Company uses to collect payments and recover debts or to provide a service on its behalf;
 - 13.1.2. Any firm, organisation or person that/who provides the Company with products or services;
 - 13.1.3. Any payment system the Company uses;
 - 13.1.4. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the Company has a legal duty to share information;
 - 13.1.5. Third parties to whom payments are made on behalf of employees;
 - 13.1.6. Financial institutions from whom payments are received on behalf of data subjects; and
 - 13.1.7. Employees, contractors and temporary staff.

14. CROSS-BORDER FLOWS OF PERSONAL INFORMATION

- 14.1. Section 72 of POPI provides that Personal Information may only be transferred out of the Republic of South Africa:
- 14.1.1. If the recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially like the Conditions for Lawful Processing as contained in POPI; or
 - 14.1.2. If the Data Subject consents to the transfer of their Personal Information; or
 - 14.1.3. If the transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
 - 14.1.4. If the transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
 - 14.1.5. If the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would likely provide such consent.

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DIRECTORS: A. Sharp, R. Roseveare, W. Malan

- 14.2. Personal Information may be transmitted cross — border to the Company's suppliers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. The Company will endeavour to ensure that its dealers and suppliers will make all reasonable efforts to secure such data and Personal Information.

15. DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED

- 15.1. The Company undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. The Company may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved

15.1.1. Access Control of Persons

The Company shall implement suitable technical and organizational measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data is processed.

15.1.2. Data Memory Control

The Company undertakes to implement suitable measures to prevent unauthorized input into

15.1.3. User Control

The Company shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment data memory and the unauthorised reading, alteration or deletion of stored data.

15.1.4. Access Control to Data

The Company represents that the persons entitled to use the Company's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

15.1.5. Transport Control

The Company shall implement suitable measures to prevent data from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

16. OBJECTION TO THE PROCESSING

- 16.1. Section 11 (3) of POPI and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual (Annexure A).

BUI GROUP

DIRECTORS: A. Sharp, R. Roseveare, W. Malan

17. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

- 17.1. Section 24 of POPI and regulation 3 of the POPI Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form as per Annexure B.

18. REQUEST TO ACCESS RECORD

- 18.1. Section 17 of POPI provides that the Responsible Party must maintain the documentation of all processing operations under its responsibility. Should the Data Subject require access to a record, the Data Subject is required to complete Form 2 "Request to Access Record."
- 18.1.1. Form 2 is available for download on the Company's website.
- 18.1.2. Once Form 2 is completed kindly submit same to: dhiren@bui.co.za and valencian@bui.co

19. OUTCOME OF REQUEST AND OF FEES PAYABLE

- 19.1. After the Data Subject's request as per Form 2 is received, the Data Subject will receive Form 3 (as soon as reasonably possible) which contains the details pertaining to the fees that must be paid prior to processing the Data Subjects the request.
- 19.2. A copy of Form 3 is available for download and perusal on the Company's website.

20. ACCEPTANCE

Agreed to and accepted for and on behalf of the Company on this the 22 day of July 2024.

Name: Valencia Naidoo

Capacity: BUI Group Legal Advisor

(Duly Authorised)

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DIRECTORS: A. Sharp, R. Roseveare, W. Malan