

PHARMACO DISTRIBUTION (PTY) LTD

PAIA MANUAL

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

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APPENDICES

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1. DEFINITIONS

The following expressions have the meanings assigned to them hereunder and cognate expressions bear corresponding meanings, namely -

- 1.1 **"PAIA"** Promotion of Access to Information Act No. 2 of 2000 (as amended);
- 1.2 **"POPIA"** Protection of Personal Information Act No.4 of 2013;
- 1.3 **"REGULATOR"** shall mean the Information Regulator of the **REPUBLIC**;
and
- 1.4 **"REPUBLIC"** shall mean the **REPUBLIC**.

2. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT

- 2.1 **PAIA** was enacted on 3 February 2000 and aims to:
 - 2.1.1 Foster and maintain a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, as contained in Section 32 of the Constitution of the **REPUBLIC**; and
 - 2.1.2 Actively promote a society in which the people of South Africa have effective access to information, in order to cultivate the full exercise and protection of their rights.
- 2.2 Pursuant to Section 51 of **PAIA**, all private bodies are required to compile a manual, for purposes of compliance in respect thereof.

- 2.3 Reference to, and inclusion of, any information herein, in addition to the information, which is specifically required in terms of Section 51 of **PAIA**, does not have the effect of creating any rights or entitlements to receive such information, unless it is so prescribed in terms of **PAIA**.
- 2.4 **PAIA** gives any person who seeks access to a record of a private or public body (hereinafter referred to as a "**REQUESTER**"), a right to lodge a request for access to the information officer of a public or private body.
- 2.5 **PAIA** provides that requests for access to a company's prescribed information may be made to the company, and that the company is obliged to make such information available, subject to applicable legislative and/or regulatory requirements, unless such information is prohibited from release, in terms of **PAIA**.

3. **PURPOSE OF THE MANUAL**

This **PAIA** Manual is useful for the public to-

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal **PAIA** request;
- 3.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 3.3 know the description of the records of the body which are available in accordance with any other legislation;

- 3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 3.5 know the description of the guide on how to use **PAIA**, as updated by the **REGULATOR** and how to obtain access to it;
- 3.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 know if the body has planned to transfer or process personal information outside the **REPUBLIC** and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. COMPANY INTRODUCTION

4.1 Pharmaco Distribution (Pty) Ltd with registration number 1998/0109783/07 (hereinafter referred to as "**PHARMACO**") is a private company duly incorporated and registered in South Africa in accordance with the laws of the Republic of South Africa, with its registered office situated at 3 Sandown Valley Crescent, South Tower, 1st Floor, Sandton, 2196.

4.2 **PHARMACO** was established as a pharmaceutical company to effectively support international pharmaceutical manufacturers with the registration, distribution, marketing and sales of products in and throughout Africa, with representation in West Africa, Central Africa, East Africa, Southern and South Africa.

4.3 This manual of **PHARMACO** is available for viewing at its premises situated at 3 Sandown Valley Crescent, South Tower, 1st Floor, Sandton, 2196, as well as on the **PHARMACO'S** website, which may be accessed at: -

4.3.1 <https://pharmaco.co.za/>

5. KEY CONTACT DETAILS (SECTION 51(1)(a))

5.1 Chief Information Officer

Name: Roberto Carlo Agustoni

Tel: 011 784 0077

Email: Privacy@pharmaco.co.za

5.2 Deputy Information Officer

Name: Tatiana Agustoni

Tel: 076 413 9005

Email: Tatiana.agustoni@pharmaco.co.za

5.3 National or Head Office

Postal Address: PO Box 786522 Sandton, 2146

Physical Address: 3 Sandown Valley Crescent, South Tower, 1st Floor,
Sandton, 2196.

Tel: 011 784 0077

Email: Pharmaco@pharmaco.co.za

Website: <https://pharmaco.co.za/>

6. THE GUIDE AS REFERRED TO IN SECTION 10 OF THE ACT (SECTION 51(1)(b)(i))

- 6.1 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**.

- 6.2 The Guide is available in each of the official languages and in braille.
- 6.3 The aforesaid Guide contains the description of-
- 6.3.1 the objects of **PAIA** and **POPIA**;
- 6.3.2 the postal and street address, phone, and fax number and, if available, electronic mail address of-
- 6.3.2.1 the Information Officer of every public body, and
- 6.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of **PAIA**¹ and section 56 of **POPIA**²;
- 6.3.3 the manner and form of a request for-
- 6.3.3.1 access to a record of a public body contemplated in section 11³; and
- 6.3.3.2 access to a record of a private body contemplated in section 50⁴;

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester 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 to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

- 6.3.4 the assistance available from the Information Officer of a public body in terms of **PAIA** and **POPIA**;
- 6.3.5 the assistance available from the **REGULATOR** in terms of **PAIA** and **POPIA**;
- 6.3.6 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-
 - 6.3.6.1 an internal appeal;
 - 6.3.6.2 a complaint to the **REGULATOR**; and
 - 6.3.6.3 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 **REGULATOR** or a decision of the head of a private body;
- 6.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 6.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

6.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

6.3.10 the regulations made in terms of section 92¹¹.

6.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the **REGULATOR**, during normal working hours.

6.5 The Guide can also be obtained-

6.5.1 upon request to the Information Officer;

6.5.2 from the website of the **REGULATOR**
(<https://www.justice.gov.za/inforeg/>).

6.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours -

6.6.1 English and Afrikaans.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

7. SECTION 52(2) NOTICE (SECTION 51(1)(b)(ii))

7.1 At this stage, no notices have been published on the categories of records that are automatically available, without a person having to request access in terms of **PAIA**.

7.2 However, certain information is freely available as is listed in the table below.

Category of records	Types of the Record	Freely available
Publicly available records	Those records disclosed on PHARMACO'S website(s) and/or media releases and news. Such as: Contact information for PHARMACO ; General Information about PHARMACO as well as its various departments; Information regarding PHARMACO'S pharmaceutical and distribution partners; The products and services offered by PHARMACO as well as the specific areas in	X

	<p>which they are offered; Information about a possible career at PHARMACO.</p> <p>Information is also freely available to: Healthcare Practitioners who have registered on PHARMACO'S Novassist App, which is downloadable on supporting application downloading platforms; information in respect of PHARMACO'S Novalac products; Members of the public and/or Healthcare Practitioners who have accessed PHARMACO'S NeuroAid platform, which is powered by Beepd™, are also able to freely access information, which information includes, but is not limited to, information in respect of PHARMACO'S NeuroAid product and clinical information in respect thereof, where applicable.</p>	
Non-confidential	Statutory records maintained at the	X

records	Companies and Intellectual Property Commission.	
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7.3 Should a person wish to request access to any of the freely available information listed above, they may do so by contacting **PHARMACO** telephonically, or via email with their request, alternatively they may visit **PHARMACO'S** website to access the relevant information, where such information is available.

7.4 Additionally, the following information is available to all employees and need not be requested: -

Category of records	Types of the Record	Freely available
Employee records	Includes, amongst other things, private records provided by employees, records provided by third parties relating to employees, conditions of employment and other employee-related contractual and quasi legal records, internal evaluation records, correspondence with employees, training records, records of	X

	disciplinary hearings and related matters, PHARMACO'S policies, and procedures.	
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7.5 Employees may access these records by directing their request to **PHARMACO**.

8. **INFORMATION/DOCUMENTATION HELD IN ACCORDANCE WITH OTHER LEGISLATION (SECTION 51(1)(b)(iii))**

8.1 Certain records of **PHARMACO** are held in terms of legislation other than **PAIA**. Unless disclosure is prohibited in terms of the relevant legislation, regulations, contractual agreements or otherwise, records which are required to be made available in terms of the relevant legislation shall be made available for inspection by interested parties, subject to the requirements and conditions set out in the relevant legislation and internal policies and procedures.

8.2 Accordingly, information is available in terms of the following legislation, if and where applicable:

Item	Legislation
1.	Companies Act 71 of 2008, as amended.
2.	Copyright Act 98 of 1978, as amended.
3.	Trade Marks Act 194 of 1993, as amended.

4.	Employment Equity Act 55 of 1998, as amended.
5.	Income Tax Act 95 of 1967, as amended.
6.	Labour Relations Act 66 of 1995, as amended.
7.	Basic Conditions of Employment Act 75 of 1997, as amended
8.	Immigration Act 13 of 2002, as amended.
9.	Value Added Tax Act 89 of 1991, as amended.
10.	Protection of Personal Information Act 4 of 2013, as amended.
11.	Promotion of Access to Information Act 2 of 2000, as amended.
12.	Unemployment Insurance Act 30 of 1996, as amended.
13.	Electronic Communications and Transactions Act 25 of 2002, as amended.
14.	Compensation of Occupational Injuries and Diseases Act 130 of 1993, as amended.
15.	Occupational Health and Safety Act 85 of 1993, as amended.
16.	Consumer Protection Act 68 of 2008, as amended.
17.	Tax Administration Act 28 of 2011, as amended.

18.	Financial Intelligence Centre Act 38 of 2001, as amended.
19.	Competition Act 71 of 2008, as amended.

8.3 The above is not an exhaustive list of **PHARMACO**' applicable statutes, which may require the keeping of records.

9. FACILITATION OF A REQUEST FOR ACCESS (SECTION 51(1)(b)(iv))

9.1 To facilitate the processing of your request for access to a record, kindly:

9.2 Use the prescribed form (Form 2), of Government Notice No. R.757 dated 27 August 2021, a copy of which is annexed hereto marked **Appendix 1**.

9.3 Address your request to **PHARMACO**.

9.4 Provide sufficient details to enable **PHARMACO** to identify:

9.4.1 The record(s) requested;

9.4.2 The **REQUESTER** (and if an agent is lodging the request, proof of capacity);

9.4.3 The form of access which is required;

9.4.4 The postal address, fax number, email address or other relevant information of the **REQUESTER** in the **REPUBLIC**;

9.4.5 The right, which the **REQUESTER** is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right;

- 9.4.6 If the **REQUESTER** wishes to be informed of the decision in any manner (in addition to the written decision), the manner and particulars thereof;
- 9.4.7 If the request is made on behalf of a person, to furnish proof of the capacity in which the **REQUESTER** makes such request, to the satisfaction of **PHARMACO'S** Head.
- 9.5 **PHARMACO** may, and must in certain instances, refuse access to records on any of the grounds set out in Part 3 of Chapter 4 of **PAIA**, which instances include, but are not limited to, the following:
- 9.5.1 That access would have the effect of unreasonably disclosing **PERSONAL INFORMATION** about a third party;
- 9.5.2 The necessity of protecting the confidential information of a third party;
- 9.5.3 The necessity of protecting the safety of individuals and protecting property;
- 9.5.4 That the record constitutes privileged information of a third party, or the **COMPANY** itself; and
- 9.5.5 Professional privilege.
- 9.6 The **COMPANY** will decide in relation to a request for a record within 30 (Thirty) days from the date of receipt of the request, unless third parties are required to be notified or the 30 (Thirty) day period is extended as

provided for in **PAIA**. The **COMPANY** will notify the **REQUESTER** accordingly.

9.7 The following applies to requests:

9.7.1 A **REQUESTER** is required to pay the prescribed fees (R140.00) before a request will be processed;

9.7.2 If the search and preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);

9.7.3 A **REQUESTER** may lodge an application with a court against the tender/payment of the request fee and/or deposit;

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

9.7.5 Payments should be made to **PHARMACO**.

9.8 The fee structure is available on the website of the South African Information Regulator at <https://www.justice.gov.za/infereg/legal/20210827-gg45057gon757-PAIAregulations.pdf>, an excerpt of which is annexed hereto marked **Appendix 2**

9.9 **PHARMACO** holds records pertaining to certain subjects. The below table provides an indication of the subjects, on which **PHARMACO** holds records, as well as the categories of records held on each subject.

SUBJECTS ON WHICH PHARMACO HOLDS RECORDS.	CATEGORIES OF RECORDS HELD ON EACH SUBJECT.
Incorporation Documents and documents pertaining to the company	Memorandum of Incorporation, share register, shareholders agreements, minutes of general meetings, lists of directors, special and ordinary resolutions.
Property	Asset registers, Title Deeds and Lease agreements in respect of immovable property, insurance records in respect of moveable and immovable property, immovable property drawings and detailed plans, correspondence
Financial and Accounting Records	Accounting records, debtors' records, creditors records, insurance reports, Auditors reports, invoices of suppliers and customers, billing information, reconciliations, credit/debit notes, journals, interim and annual financial statements, ledgers, balance sheets, income statements, trial balances, payment schedules, cheque runs and cash flow statements, management accounts, banks statements, in-out funds transfers records, correspondence, details of auditors and audit reports, electronic payment records.

Publications	Updates, newsletters, company information, product information and other publications prepared by PHARMACO .
Taxation Records	Pay as you earn records, documents issued to employees pertaining to income tax, records of payments to SARS on behalf of employees, company Tax Returns, company VAT records, Unemployment Insurance Fund Records, SARS correspondence, SARS company's general records.
Administration Records	Minutes of meetings of PHARMACO , minutes of meetings of the committees and sub committees of PHARMACO , general correspondence, lease agreements, copies and correspondence relating to various insurance policies, salary work-papers, security systems and operational records, all regulatory related paperwork, product dossiers, company related and required certifications and licences, Contractual records and correspondence, insurance policies and correspondence, documents related to claim submissions and payments, travel booking records, payment records and correspondence.
Human Resources	Contracts of employment, list of employees, conditions of employment, payroll records,

Records	disciplinary records, leave records, remuneration records, job specifications, performance evaluations, health and safety records, personnel files, records provided by third parties relating to personnel, information relating to prospective employees including curricula vitae and application forms, employee tax information, IRP5 documents, insurance, pension and/or provident fund contributions and claims, documents relating to disciplinary and grievance procedures and all employment applications, remuneration policy, next of kin contact details, personal vehicle information, personnel training records, professional accreditations/certifications, all personnel information required in the administration of government required processes i.e. EEA, B-BBEE, expense claims and reimbursement information.
Medical products	Product inventories, price lists, research reports, scientific and/or technical information in respect of medical products, clinical trial information, product registration documentation and dossiers, licenses, permits, consents and approvals and applications in respect thereof, adverse event reporting.
Marketing	Content for PHARMACO'S website, App and/or

	Web-based platforms, databases, mailing lists for clients and potential clients, marketing and promotional materials, marketing strategies, product information, industry-related statistical and market information, customer scripting habit data (Impact Rx)
Intellectual Property	Licenses in respect of intellectual property, and agreements concluded in respect thereof.
Customers	Customer information and documentation including documentation in terms of FICA, information on users on PHARMACO'S Apps and/or web-based platforms, correspondence with Customers and/or users on PHARMACO'S Apps and/or web-based platforms and general correspondence with members of the public, customer performance records and buying trends i.e. SSD, Customer personnel information i.e. contact details of customer representatives etc.
Suppliers	Supplier lists and details, agreements with suppliers, programmes including software license agreements, relevant personnel information
Subcontractors	Administrative and logistics service agreement and Quality Assurance agreements, Operational service

	agreements and agreement with third party service providers, details in respect of company representatives, financial information and correspondence.
Information Technology	The network and the systems on it, Information technology computer software, records relating to computer systems, Apps and/or Web-based platforms, passwords and access codes

10. RELATIONSHIP WITH THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013, AS AMENDED ('POPIA') (SECTIONS 51(1)(c)(i) - 51(1)(c)(iv))

10.1.1 **PHARMACO** processes personal information for various reasons, such as: -

10.1.1.1 To correspond with customers, suppliers, sub-contractors, employees, and members of the public;

10.1.1.2 Where a customer, supplier, sub-contractor and/or employee has consented to the processing;

10.1.1.3 To take the steps which are necessary to conclude a contract with a customer, supplier, sub-contractor, employee and/or a member of the public as the case may be;

- 10.1.1.4 To comply with contractual obligations towards customers, suppliers, employees, sub-contractors;
- 10.1.1.5 To market **PHARMACO'S** products and services to customers, or those parties who have consented to such marketing;
- 10.1.1.6 To comply with obligations imposed by the laws of the **REPUBLIC**;
- 10.1.1.7 Where processing is intended to protect the legitimate interests of customers, suppliers, employees and/or sub-contractors; and/or
- 10.1.1.8 Where processing is necessary to pursue **PHARMACO'S** legitimate interests or that of a third party to whom information is supplied.

10.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto (Section 51(1)(c)(ii))

Categories of Data Subjects	Personal Information that may be processed
Members of the public	Names, addresses, telephone, or email addresses.
Customers / Clients	Name, age, gender, contact information, details of customer representatives (where applicable),

Categories of Data Subjects	Personal Information that may be processed
	financial information, correspondence with customers, data from government-issued identity cards, home address, zip/postal code, email address and phone number, Health information where such information is disclosed and relevant to the provision of services.
Web-Based platform and/or App users	Personal information of registered users, whether registered or unregistered, of its Novassist App and/or NeuroAid Platform, including, inter alia, their names and contact details.
Suppliers	Names, addresses, registration numbers or identity numbers, bank details, contact information, details of customer representatives (where applicable), financial information and VAT numbers.
Employees	Name and surname, gender, nationality, race, marital status, date of birth, age, personal contact details, emergency contact details, ID number or passport number, as well as the personal information of employees family members for the purposes of medical aid and pension, driver's

Categories of Data Subjects	Personal Information that may be processed
	<p>license details, languages spoken and/or details of your health, possible disability, as well as financial and tax related information, Interview information / notes conducted with you prior to your employment, the information contained in your Curriculum Vitae such as your employment history and references, contract of employment or engagement, work contact details, employee or payroll number, work location, your worker and/or systems ID, your work biography, the department in which you render services, the person to whom you are to report to, your termination/contract end date (if any), the reason for termination, your last day of work, UIF and COIDA submissions and / or claims related information, Documentation in respect of your registration with any applicable authority (i.e. SARS and/or the Department of Labour), including any professional registration (i.e. Association for Dietetics in South Africa), your status in respect of such registration, any professional number associated to such affiliation</p>

Categories of Data Subjects	Personal Information that may be processed
	<p>or registration and any registration certificates or references in respect thereof, Information in respect of your remuneration, whether hourly, contractually, or in terms of salary, information regarding allowances, overtime, bonuses and/or commission, leave payment, bank account information, income tax information, expense claims, contributions to the Unemployment Insurance Fund / Skills Development Levy and any information of a similar nature, Information regarding statutory or contractual leave accrued and/or taken, requests and approval therefore (if any), attendance or absence information, manager and/or HR communications, Appraisals and performance review information, performance objectives and/or outcomes and any records which are kept in respect thereof, including general ad hoc performance related communications, awards received and award-related information., Records and documentation regarding any training courses and/or coaching</p>

Categories of Data Subjects	Personal Information that may be processed
	<p>which have been attended, agreements in respect of such training/coaching and any certifications in respect thereof, Documentation and records in respect of any disciplinary proceedings and/or sanctions disciplinary sanctions, claims or legal proceedings brought by the employee, records regarding any mediation, conciliation or arbitration proceedings, settlement negotiations, records of any employee grievances or complaints and documentation pertaining to the resolution thereof, Records of any electronic communications sent or received using company equipment or company provided internet access, login and access records of on any systems or buildings, download and printing records on company equipment, call or meeting recordings, information captured by IT security and information on any closed-circuit television footage which are used for health safety and security and specifically the protection of our assets, as well as health information collected in terms of the Occupational Health and Safety Act,</p>

Categories of Data Subjects	Personal Information that may be processed
	Information and documentation pertaining to your name, employee workplace number, gender, race, nationality, your disability status for the purposes of employment equity.
Sub-contractors	Names, addresses, registration numbers or identity numbers, bank details, contact information, details of customer representatives (where applicable), financial information, VAT numbers and conformance to safety legislation and controlled process.

10.3 Recipients or categories of recipients to whom the personal information may be supplied (Section 51(1)(c)(iii))

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Names and contact information for members of the public who contact PHARMACO .	Various departments of PHARMACO , who are able to respond to questions and provide necessary information to

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
	members of the public. Third parties, to the extent that such third parties require such information in order to assist the relevant member of public with the resolution of their particular question, issue or concern.
Employee information in respect of COVID-19 Status	Department of Health; Department of Labour
Employee name, identity number, date of birth, address, contact number, email address, income tax number, bank details, remuneration structure and frequency.	Human Resources and Payroll Department and external auditors; Financial advisor for provident fund and medical aid; Among the PHARMACO group of subsidiaries for the purposes of intercompany reporting.
Employee names and contact information.	Customers, service providers, suppliers, and members of the public to the extent that such sharing is necessary to allow such customers and/or subcontractors to contact

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
	PHARMACO and/or its relevant employees.
Employee name, surname, registration number (where applicable), salary, ID number, start date, termination date and reason of termination (where applicable), contributions per month and tax payable	Governmental Regulatory Authorities including without limitation, the Department of Labour, SARS, specific bargaining councils, the Department of Health and/or the South African Health Products Regulatory Authority (SAHPRA)
Employee name, surname, telephone number and work title in order to grant access to facilities and/or systems	IT Department
Employee name, surname, address, information regarding your driver's license, vehicle details, contact information, Income Tax number and/or marital status., where the company issues	Authorised third parties, including, but not limited to, Investec.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
a company petrol card	
Employee name and contact information	International Partners and/or Export service providers
Customers names, contact information, details of customer representatives (where applicable), financial information and correspondence with customers	Employees of PHARMACO to enable them to perform their functions and/or who are responsible for performing accounting functions; companies forming part of PHARMACO'S group of companies for the purposes of intercompany reporting; service providers, including without limitation, logistics service suppliers and/or warehouse operators, and/or among PHARMACO'S group of companies
Supplier names, contact information and financial information.	Employees of PHARMACO to facilitate the rendering of required services and among the PHARMACO group of companies for the purposes of reporting.
Supplier representatives' names	Employees of PHARMACO to enable

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
and contact information.	them to perform their functions and/or who are responsible for performing accounting functions.
Sub-contractor names, contact information and financial information.	Employees of PHARMACO to facilitate performance of sub-contractor obligations; PHARMACO'S accounting department to facilitate payment of remuneration and among the PHARMACO group of companies for the purposes of reporting.
Personal information of users, on the Novassist App and/or NeuroAid platform including, inter alia, their names and contact details.	The information of registered/unregistered users, as the case may be, on PHARMACO'S App and/or Web-based Platform will not be shared, save the extent that personal information of registered/unregistered users may be provided to Beepd, in their capacity as operators of the Web-based Platform.

10.4 **Planned transborder flows of personal information (Section 51(1)(c)(iv))**

10.4.1 **Employees**

10.4.1.1 **PHARMACO** may transfer the personal information of its employees outside of the Republic of South Africa to: -

10.4.1.1.1 Subsidiaries of **PHARMACO** for the purposes of communication among the **PHARMACO** group of companies;

10.4.1.1.2 export service providers, to correspond with them, manage the effective transportation of products and services or for the purposes of complying with our contractual obligations; and/or

10.4.1.1.3 International partners, where such transfer is required for operational purposes or for the purposes of complying with contractual obligations.

10.4.2 **Customers**

10.4.2.1 The personal information of customers may be transferred outside of the Republic of South Africa to: -

10.4.2.1.1 **PHARMACO'S** service providers, where such transfer is necessary for the performance of a contract between **PHARMACO** and the customer; and/or

10.4.2.1.2 among **PHARMACO'S** group of companies, for the purposes of reporting.

10.4.3 **Subcontractors**

10.4.3.1 The personal information of subcontractors may be transferred outside of the Republic of South Africa where such transfer is necessary for the performance of a contract between the agent and **PHARMACO** or for the purposes of informing **PHARMACO'S** customers of the details of its subcontractor.

10.4.4 **Suppliers**

10.4.4.1 The personal information of **PHARMACO'S** suppliers may be transferred outside of the Republic of South Africa to: -

10.4.4.1.1 Holding companies or subsidiaries of **PHARMACO** for the purposes of communication among the **PHARMACO** group of companies;

10.4.4.1.2 Export service providers, to facilitate the effective export operation of **PHARMACO**.

10.4.5 **Members of the Public**

10.4.5.1 The personal information of members of the Members of the Public may be transferred outside of the Republic of South Africa to: -

10.4.5.1.1 International partners to the extent that such transfer is required to comply with contractual pharmacovigilance requirements;

10.4.5.1.2 Holding companies or subsidiaries of **PHARMACO** for the purposes of communication among the **PHARMACO** group of companies, to the extent that communication is necessary to resolve a query or request from a members of the public.

10.4.6 **Registered users of Novassist App and/or NeuroAid Platform**

10.4.6.1 The personal information of registered users is only transferred outside of the Republic of South Africa to the extent that it is stored on servers outside the Republic of South Africa for security purposes.

10.5 **Security measures to be implemented to ensure confidentiality, integrity and availability of personal information (Section 51(1)(c)(v))**

10.5.1 **PHARMACO** ensures the confidentiality, integrity and availability of the personal information it processes by placing same onto secure servers, which are only accessible: -

10.5.1.1 from password protected computers; and

10.5.1.2 on a password protected server; and

- 10.5.1.3 by designated members of staff with separate access permissions, as defined by management and implemented strictly on a specific need to access basis, on server shares applying only to their department.
- 10.5.2 The information contained on **PHARMACO'S** servers is only accessible on-site, unless pre-approved access is granted. Remote access then only via secure vpn client, with additional username and password protection.
- 10.5.3 In addition, **PHARMACO'S** website uses Secure Socket Layer (SSL) encryption to ensure privacy, authentication, and data integrity in internet communications.
- 10.5.4 **PHARMACO'S** Web-based NeuroAid Platform encrypts data during transmission and further encrypts user passwords to ensure the security, integrity and confidentiality of the personal information of any registered users.
- 10.5.5 **PHARMACO'S** data is backed up to offsite, secure cloud storage. All backup data in the cloud is encrypted during transmission and remains encrypted in storage. Restore can only take place with the encryption key.
- 10.5.6 Up to date Anti-virus software is installed on all machines and regular patches and updates of software is performed to keep systems compliant.

- 10.6 Pharmaco has a dedicated hardware firewall, to protect the corporate network from external attacks and this is a fully outsource and updated product maintained by an external specialist company.

11. AVAILABILITY OF THE MANUAL (SECTION 51(3))

- 11.1 A copy of the Manual is available-

- 11.1.1 On: -

- 11.1.1.1 <https://pharmaco.co.za/>

- 11.1.2 at the head office of **PHARMACO** for public inspection during normal business hours;

- 11.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

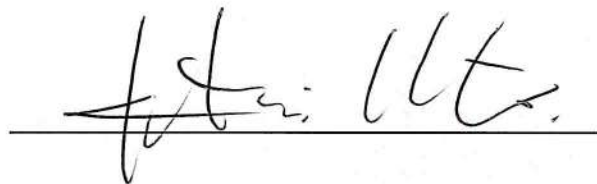
- 11.1.4 to the **REGULATOR** upon request.

- 11.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

12. UPDATING OF THE MANUAL

PHARMACO will on a regular basis update this manual.

Signed at SANDTON.....on this the 10th.....day of MARCH..... 2022

A handwritten signature in black ink, appearing to read "Roberto Carlo Agustoni", written over a horizontal line.

For: **PHARMACO**

Duly Authorised

Name: Roberto Carlo Agustoni

Designation: Managing Director

APPENDIX 1

FORM 2
REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			

Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
PARTICULARS OF RECORD REQUESTED				
<p><i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>				
Description of record or relevant part of the record:				
Reference number, if available				
Any further particulars of record				
TYPE OF RECORD (Mark the applicable box with an "X")				
Record is in written or printed form				
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)				
Record consists of recorded words or information which can be reproduced in sound				
Record is held on a computer or in an electronic, or machine-readable form				

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	
FEES	
<p>a) A request fee must be paid before the request will be considered.</p> <p>b) You will be notified of the amount of the access fee to be paid.</p> <p>c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</p> <p>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption</p>	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

APPENDIX 2

FEES IN RESPECT OF PRIVATE BODIES

ITEM	DESCRIPTION	AMOUNT
1.	The request fee payable by every 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-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable format on: (iii) Flashdrive (to be provided by requestor) (iv) Compact disc • If provided by requester • If provided to requester	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 page	R24.00
8.	Copy of an audio record on: (v) Flash drive (to be provided by requestor) (vi) Compact disc • If provided by requester • If provided to requester	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part or an hour, excluding the first hour, reasonably required for such search and preparation To not exceed a total cost of	R 145.00 R 435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, email or any other electronic transfer	Actual Expense, if any.