# Mums & Bums Mother and Baby Clinic

# PAIA Manual

## 1. Introduction

This PAIA Manual is prepared in accordance with:

- The Promotion of Access to Information Act 2 of 2000 (“PAIA”);
- The Protection of Personal Information Act 4 of 2013 (“POPIA”);
- Applicable South African healthcare, privacy, and record-keeping legislation.

**The purpose of this Manual is to:**

- Provide information regarding the records held and processes by the clinic;
- Explain how requests for access to records may be made;
- Outline rights and procedures under PAIA and POPIA;
- And promote lawful processing of personal information.

This Manual is available:

- At the clinic on request;
- And electronically where applicable.

## 2. Details of the Private Body

**Practice Name**
Samantha Pieterse T/A Mums & Bums Mother and Baby Clinic

**Practice Number**
9990880001025074

**Physical Address**
94 Panorama Road
Rooihuiskraal
Centurion

**Contact Number**
+27 64 508 1672

**General Email Address**
info@mumsandbums.co.za

**Website**
www.mumsandbums.co.za

## 3. Information Officer Details

The head of the private body serves as the Information Officer in terms of PAIA and POPIA.

**Information Officer**
Samantha Pieterse (10409/2022-2023/IRRTT)

**Contact Email**
samantha@mumsandbums.co.za

**Contact Number**
+27 064 508 1672

## 4. Guide on How to Use PAIA

The PAIA Guide contemplated in section 10 of PAIA is available from the Information Regulator.

The guide contains information regarding:

- The purpose of PAIA;
- How to request access to records;
- How to lodge complaints;
- And rights available under PAIA and POPIA.

### 4.1 Information Regulator Contact Details

**Website:**
https://inforegulator.org.za/

**General Enquiries Email:**
enquiries@inforegulator.org.za

**PAIA Complaints Email:**
PAIAComplaints@inforegulator.org.za

**POPIA Complaints Email:**
POPIAComplaints@inforegulator.org.za

**Physical Address:**
Woodmead North Office Park
54 Maxwell Drive
Woodmead
Johannesburg
2001

### 4.2 Languages and availability of the Guide

Copies of the Information Regulator's Guide on how to use PAIA are available for public inspection at the Clinic during normal business hours in English and Afrikaans. The Guide may also be requested from the Information Officer or accessed on the Information Regulator's website at https://inforegulator.org.za/paia/.

## 5. Nature of the Clinic

Mums & Bums Mother and Baby Clinic is a private healthcare practice providing healthcare-related services, including but not limited to:

- Baby and child healthcare;
- Vaccinations and immunisations;
- Women's health services;
- Contraception services;
- Antenatal support and education;
- Pregnancy-related care;
- Adult wellness services;
- IV therapy services;
- Health education;
- And associated healthcare and administrative support services.

The clinic processes personal and special personal information in order to provide healthcare services and operate the practice lawfully, ethically, and safely.

## 6. Categories of Records Held by the Clinic

The clinic may maintain records, including, but not limited to:

### 6.1 Records Available Without a Formal PAIA Request:

The following information is available without submitting a formal PAIA request: this PAIA Manual; the clinic's public Privacy & Data Protection Policy; general information about the clinic's services, contact details and booking process; and public educational information published on the clinic website.

These can be accessed at https://www.mumsandbums.co.za/privacy-policy. You may also request a printed copy of this Manual at the clinic. This does not make confidential patient, child, staff, or third-party records automatically available. Requests for other records are considered under PAIA.

### 6.2 Records Held Under Other Legislation

| Record Category | Legislation |
|---|---|
| Patient health records and clinical notes | National Health Act 61 of 2003; applicable professional requirements |
| Employment records, such as contracts, leave and wage records | Basic Conditions of Employment Act 75 of 1997 and other applicable employment legislation |
| Tax and accounting records | Tax Administration Act 28 of 2011 and applicable tax legislation |
| This PAIA Manual and records of access requests | Promotion of Access to Information Act 2 of 2000 |
| Information Officer registration and POPIA compliance records | Protection of Personal Information Act 4 of 2013 |

### 6.3 Subjects and Records Held

| Subject | Categories of Records |
|---|---|
| Patient and clinical care | Patient details, medical histories, clinical notes, treatment and medication records, referrals, consent and intake forms, laboratory information where applicable, and appointment and billing records |
| Baby, child, women's and pregnancy care | Child and parent/guardian details, vaccination records, growth and developmental information, antenatal and women's health records |
| Administration and communications | Appointment schedules, correspondence, complaints, incident reports, internal policies and SOPs, operational and waste-management records |
| Finance and billing | Invoices, receipts, accounting and banking records, supplier invoices, payment reconciliations and medical-aid remittance information |

| Subject | Categories of Records |
|---|---|
| Human resources | Employment contracts, leave, disciplinary and training records, confidentiality agreements, and POPIA acknowledgements |
| Suppliers and service providers | Supplier details, invoices, contracts and related correspondence |
| Electronic and website records | Website enquiries, online booking information, emails, WhatsApp communications where applicable, electronic patient records, website analytics and CCTV footage where applicable |

## 7. Categories of Personal Information Processed

| Categories of data subjects | Information that may be processed |
|---|---|
| Adult patients | Names, contact and identity details, medical-aid information, health history, clinical notes, treatment, appointment, consent and billing information |
| Children who are patients | Name, dates of birth, parent/guardian details, health and vaccination history, growth and developmental information |
| Parents and guardians | Contact and identity details, relationship to the child, consent or authority records, and relevant billing information |
| Employees and job applicants | Contact and identity details, qualifications, employment, leave, training, payroll and related records |
| Suppliers and service providers | Business and contact details, payment information, invoices, contracts and correspondence |
| Website visitors, enquirers and booking users | Contact, account and booking details, communications and technical or website-usage information |
| Referring or other healthcare practitioners | Contact and professional details, referral correspondence and information relevant to a patient's care |

## 8. Purpose of Processing Personal Information

Personal information may be processed for purposes including:

- Patient care and treatment;
- Healthcare administration;
- Appointment scheduling;
- Patient communication;
- Medical record keeping;
- Medical aid claims and billing and payment processing;
- Regulatory and legal compliance;
- Vaccination administration and record keeping;
- Antenatal and educational services;
- Website functionality;
- Operational management;
- Staff administration;
- Safety and security;
- And any lawful operational purpose related to the functioning of the clinic.

## 9. Lawful Basis for Processing

The Clinic processes personal information only where a lawful ground under section 11 of POPIA applies. These grounds include consent where required; performing a contract; complying with a legal obligation; protecting a data subject's legitimate interests; or pursuing the legitimate interests of the Clinic or a third party.

The Clinic processes special personal information, including health information, only where an applicable exception under sections 27–33 of POPIA applies. It processes children's personal information only where an applicable exception under section 35 applies.

## 10. Mandatory Information

Certain personal information is required for the clinic to:

- Provide healthcare services safely;
- Maintain lawful medical records;
- Process medical aid claims;
- Comply with healthcare and legal obligations;
- And provide appropriate patient care.

Failure to provide certain information may affect the clinic's ability to provide services safely or effectively.

## 11. Recipients of Personal Information

Personal information may be shared where lawfully required or reasonably necessary with:

- Medical aids;
- Laboratories;
- Healthcare practitioners;
- Pharmacies;
- Payment service providers;
- IT and software service providers;
- GoodX or other practice management systems;
- Accountants or auditors;
- Legal or regulatory authorities;
- Authorised healthcare service providers;
- And other authorised third parties where reasonably necessary.
- Personal information will not be sold.

## 12. Operators & Third-Party Service Providers

The clinic may utilise third-party operators or service providers to process personal information on its behalf.

Such operators may include:

- Software providers;
- Cloud storage providers;
- IT support providers;
- Payment processors;
- Practice management systems;
- Website and booking platform providers;
- And other authorised service providers.

The clinic takes reasonable steps to ensure that operators processing personal information on its behalf implement appropriate confidentiality and security measures.

## 13. Cross-Border Transfers

Where electronic service providers, cloud systems, or software platforms process information outside South Africa, the clinic will take reasonable steps to ensure that appropriate protection measures are in place as required under POPIA.

The Clinic uses service providers whose systems may store or process personal information outside South Africa. Depending on the information submitted to or stored with each service, this may include:

- **Wix.com:** Information submitted through the Clinic's website, including contact, enquiry and appointment details, as well as website technical and usage information. Wix states that visitor information may be stored in the United States, Ireland, South Korea, Taiwan, Israel and other jurisdictions.

- **Google services, including Google Drive:** Information in Clinic documents and files uploaded, shared or synced through the Clinic's Google services. Google operates servers around the world, so information may be processed outside South Africa; the location may vary by service and account settings.

- **WhatsApp Business (Meta):** Contact details, account information, messages and attachments exchanged with the Clinic, which may include appointment or health information. WhatsApp states that information may be transferred, stored, or processed in the United States and other countries where Meta companies, affiliates, partners, or service providers are located.

- **reMarkable Cloud:** Clinic notes and documents saved or synced through the Clinic's reMarkable device or account. reMarkable states that its cloud service is hosted on Google Cloud Platform, with data stored in Europe.

**GoodX** is used for practice management and patient records. GoodX currently states that it stores data on South Africa-hosted servers, so no cross-border transfer through GoodX is identified here. The Clinic will review this if GoodX confirms overseas backups, support access, or subprocessors.

The Clinic limits the personal information used with these services to what is needed for the relevant clinic, website, communication or record-keeping activity, and restricts access to authorised personnel. The Clinic will only make a cross-border transfer where a condition in section 72 of POPIA is met and will take reasonable steps to check the relevant provider terms and safeguards. Where required by POPIA, the Clinic will obtain prior authorisation before transferring special personal information or a child's personal information to a country that does not provide an adequate level of protection.

## 14. Direct Marketing

The clinic may communicate with patients regarding:

- Appointments;
- Healthcare administration;

- Treatment-related communication or healthcare-related information;
- Or operational updates.

Where direct electronic marketing consent is required under applicable law, the clinic will seek appropriate consent and provide an opportunity to opt out where applicable.

## 15. Security Measures

The clinic takes reasonable technical and organisational measures to protect personal information against:

- Unauthorised access;
- Misuse;
- Loss;
- Disclosure;
- Destruction or alteration;
- Or unlawful processing.

Security measures may include:

- Password protection and access controls;
- Locked filing and storage systems;
- Restricted staff access;
- Confidentiality obligations;
- Secure software systems;
- Antivirus and cybersecurity measures;
- Secure disposal procedures;
- And staff training.

## 16. Retention of Records

Records are retained in accordance with:

- Applicable healthcare legislation;
- Operational requirements;
- Regulatory obligations;
- And lawful record retention practices.

Personal information is retained only for as long as necessary for the purpose for which it was collected or subsequently processed, unless a longer period is required or authorised by law, reasonably required for a lawful purpose of the Clinic, required by contract, or consented to by the data subject or competent person. When the Clinic is no longer authorised to retain a record, it is securely destroyed, deleted, or de-identified.

## 17. Requests for Access to Records

A requester seeking access to records held by the clinic must submit a written request to the Information Officer via email or physical delivery.

The request should contain sufficient detail to:

- Identify the requester;
- Identify the requested record;
- Explain the right sought to be exercised or protected where applicable;
- And indicate the preferred form of access.

The clinic may require:

- Proof of identity;
- Supporting documentation;
- Prescribed request fees where applicable;
- And additional information reasonably required to process the request.

Applicable request fees and access fees may apply in accordance with PAIA and applicable regulations.

## 18. Prescribed Forms

PAIA forms are available at https://inforegulator.org.za/paia-forms/ from the Information Regulator

Relevant forms include Form 01: Request for a Copy of the Guide from an Information Officer; Form 02: Request for Access to a Record; Form 03: Outcome of Request and Fees Payable; and Form 05: Complaint. Form 04: Internal Appeal applies only where an internal appeal is available.

## 19. Grounds for Refusal of Access

Access to records may be refused on grounds permitted under PAIA, including where disclosure may:

- Unreasonably disclose personal information;
- Breach confidentiality obligations;
- Prejudice healthcare confidentiality;
- Prejudice legal privilege;
- Compromise the safety of individuals;

- Prejudice commercial information;
- Or otherwise fall within lawful grounds for refusal under PAIA.

## 20. POPIA Rights & Complaints

Any person may:

- Object to the processing of personal information where permitted by law;
- Request correction or deletion of personal information;
- Request access to personal information;
- Withdraw consent where processing is based on consent, subject to legal and operational limitations;
- Lodge complaints regarding the processing of personal information;
- Or contact the Information Regulator.

Requests or objections may be directed to the Information Officer.

## 21. Availability of this Manual

A copy of this Manual is available at https://www.mumsandbums.co.za/privacy-policy, on the Clinic's website, through the PAIA Manual download link on that page. It is also available for inspection at the Clinic during normal business hours and on request from the Information Officer.

## 22. Updating of this Manual

This Manual may be reviewed, amended, or updated from time to time in accordance with:

- Legislative amendments;
- Operational changes;
- Information Regulator guidance;
- Or clinic management requirements.

## 23. Document Control

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|---|---|
| Version: | **1.0** |
| Effective Date: | **25 May 2026** |
| Next Review Date: | **May 2027** |
| Accessible via: | **https://www.mumsandbums.co.za/privacy-policy** |

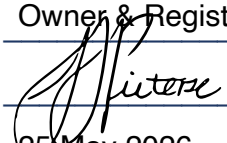
## Approval & Adoption

This Manual has been reviewed and approved by the management of Mums & Bums Mother and Baby Clinic.

## Approved By:

Name: Samantha Jane Pieterse

Position: Owner & Registered Nurse

Signature: 

Date: 25 May 2026