



PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

DATE OF COMPILATION: 25/06/2026

DATE OF REVISION: 27/07/2026

Document Title	PAIA Manual
Document Number	LM-LEG-PAIA-001
Version	2.0 Draft
Effective Date	TBD
Review Frequency	Annually or following legislative change
Prepared By	Mark Banfield & Associates (Draft)
Approved By	Information Officer
Document Owner	Information Officer

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1. LIST OF ACRONYMS AND ABBREVIATIONS

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|------|--------------------|---|
| 1.1 | “COO” | Chief Operating Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “Member” | Registered member of the CC |
| 1.4 | “IO” | Information Officer; |
| 1.5 | “Minister” | Minister of Justice and Correctional Services; |
| 1.6 | “PAIA” | Promotion of Access to Information Act 2 of 2000, as amended; |
| 1.7 | “POPIA” | Protection of Personal Information Act 4 of 2013; |
| 1.8 | “Regulator” | Information Regulator; |
| 1.9 | “Republic” | Republic of South Africa; |
| 1.10 | “CC” | Close corporation; and |
| 1.11 | “SAHPRA” | South African Health Products Regulatory Authority. |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is intended to assist members of the public to:

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 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;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;

- 2.4 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;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF LANOY MEDICAL CC

3.1. Information Officer

Name: Victoria Furbank
Tel: 082 392 2426
Email: victoria@lanoy.co.za

3.2. Admin Officer

Name: Sonja Bantjes
Tel: 082 830 1197
Email: victoria@lanoy.co.za

3.3 Access to information general contacts

Email: victoria@lanoy.co.za

3.4 National or Head Office

Physical Address: 13 Monza Close, Kyalami Park, Midrand Johannesburg 1685

Telephone: 011 466 1820

Email: victoria@lanoy.co.za

Website: www.lanoymedical.co.za

3.5 Responsibilities of the Information Officer

The Information Officer is responsible for maintaining this Manual, receiving and acknowledging PAIA requests, coordinating searches for requested records, assessing requests in accordance with PAIA, issuing decisions within the prescribed timeframes, maintaining a register of requests, and ensuring that this Manual is reviewed and updated following legislative or organizational changes.

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. 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.
- 4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

- 4.3.1. the objects of PAIA and POPIA;
- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-

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.*

- 4.3.6.1. an internal appeal;
- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. 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;
- 4.3.7. 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;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

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.

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.”

4.4. 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.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer:

Request Procedure

- Complete the prescribed PAIA request form.
- Submit the completed request to the Information Officer.
- Pay any prescribed request fee, where applicable.
- The request will be assessed in accordance with PAIA.
- A written decision will be communicated within the statutory period.
- If access is refused, reasons and available remedies will be provided.

5. CATEGORIES OF RECORDS OF LANOY MEDICAL CC AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Category	Examples	Website	Request
Corporate Information	Company profile, PAIA Manual, contact details	Yes	Yes
Quality	ISO 13485 Certificate, Quality Policy	Yes	Yes
Products	Product catalogues, brochures and IFUs intended for public release	Yes	Yes
Regulatory	Publicly available licenses and certificates, where appropriate	Where applicable	Yes
News	Public notices and announcements	Yes	Yes

6. RECORDS OF LANOY MEDICAL CC AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Record Category	Applicable Legislation
Corporate records	Companies Act 71 of 2008
Tax records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991
Employment records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998
Health and safety records	Occupational Health and Safety Act 85 of 1993
Medical device regulatory records	Medicines and Related Substances Act 101 of 1965 and applicable SAHPRA regulations

PAIA Manual and access-to-information records	Promotion of Access to Information Act 2 of 2000
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7. SUBJECTS AND CATEGORIES OF RECORDS HELD BY LANOY MEDICAL CC

Subject	Examples of Records
Corporate Governance	Registration documents, management meeting minutes, company policies
Human Resources	Employment contracts, payroll, leave, disciplinary and training records
Quality Management	Quality Manual, SOPs, internal audits, CAPAs, management reviews, supplier evaluations and equipment records
Regulatory Affairs	SAHPRA licenses, import permits, declarations of conformity, complaint and recall documentation
Operations	Purchasing, warehousing, distribution, traceability, logistics and inventory records
Sales and Customers	Customer accounts, quotations, orders and service correspondence
Finance	Financial statements, invoices, VAT and tax records, asset registers

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of processing personal information

Lanoy Medical CC processes information in the following ways:

- Verifying and onboarding healthcare practitioners, clinics, and hospital procurement groups.
- Managing supply chains, logistics, batch tracking, and regulatory compliance (e.g., product recalls).
- Managing employee payroll, statutory deductions, and internal human resources.
- Executing marketing campaigns and supporting general business operations.

8.2 Description of the categories of data subjects and related personal information

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers, practice numbers, patient case numbers
Service Providers	names, registration number, vat numbers, address, bank details, compliance certificates, corporate contracts, pricing structures
Employees	address, qualifications, gender and race, ID numbers and contact details as well as next of kin

8.3 Recipients or categories of recipients to whom personal information may be supplied

- Regulatory authorities (e.g., SAHPRA, Department of Health, SARS).
- Third-party logistics (3PL) providers and courier networks ensuring distribution fulfilment.
- External auditors and legal advisors.

8.4 Planned transborder flows of personal information

Lanoy Medical CC does not currently anticipate routine transfers of personal information outside the Republic of South Africa. Where any such transfer is required, it will be assessed and managed in accordance with POPIA and any other applicable legal requirements.

8.5 General information-security measures

Information is stored on secure, password-protected platforms with end-to-end encryption where appropriate. Lanoy Medical CC also uses antivirus and firewall protection to help safeguard the confidentiality, integrity and availability of personal information.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available:

9.1.1 on www.lanoymedical.co.za;

9.1.2 at the head office of Lanoy Medical CC for public inspection during normal business hours;

9.1.3 to any person upon request and upon payment of the prescribed fee, where applicable; and

9.2 A fee for a copy of the Manual, as contemplated in Annexure B to the PAIA Regulations, shall be payable for each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Information Officer shall review this Manual at least annually, or sooner where required by amendments to legislation, guidance issued by the Information Regulator, or material organizational changes affecting the categories of records held by Lanoy Medical CC.

Issued by



Victoria Furbank
Information Officer

11. REVISION HISTORY

Date	Version	Section(s) Updated	Description of Changes	Prepared / Updated By
27/07/2026	2.0 Draft	Front matter	Added a Document Control matrix setting out the document title, document number, version, effective date, review frequency, preparer, approver and document owner.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 1	Updated the list of acronyms and abbreviations to include SAHPRA and refined defined-term wording for PAIA, POPIA and CC.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 3	Added responsibilities of the Information Officer, including maintaining the Manual, receiving and acknowledging requests, coordinating record searches, assessing requests, issuing decisions, maintaining a request register and reviewing the Manual.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 4	Added a practical request procedure covering completion and submission of the prescribed PAIA request form, payment of applicable fees, assessment of requests, written decisions and remedies where access is refused.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 5	Expanded and restructured the schedule of records available without a formal PAIA request, including corporate information, quality, product, regulatory and news/public-notice categories.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 6	Expanded records available in accordance with other legislation to include corporate, tax, employment, health and safety, medical-device regulatory and PAIA/access-to-information records.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 7	Expanded the record schedule to include corporate governance, human resources, quality management, regulatory affairs, operations, sales and customers, and finance.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 8	Standardized POPIA terminology, refined headings, improved wording on personal-information processing, and replaced the transborder-flow wording with a more legally appropriate statement.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 9	Improved availability wording, including access via the website, inspection at the head office, availability on request and prescribed-fee wording with reference to Annexure B to the PAIA Regulations.	Mark Banfield & Associates
27/07/2026	2.0 Draft	Section 10	Strengthened the updating clause to require annual review or earlier review	Mark Banfield &

			following legislative, regulatory or material organizational changes.	Associates
27/07/2026	2.0 Draft	Issued by	Completed the issuing details by inserting Victoria Furbank as Information Officer and Sonja Bantjes as Admin Officer.	Mark Banfield & Associates
27/07/2026	2.0 Draft	General formatting and proofreading	Cleaned up headings, numbering, table-of-contents entries, spacing, punctuation, grammar, defined terms and consistency of PAIA/POPIA terminology throughout the Manual.	Mark Banfield & Associates