

PAIA and POPI Manual

This manual applies to Alpha Pharm (Pty) Ltd / Registration number: 1972/000895/07 (the “Company”).

THIS MANUAL WAS PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (“PAIA”) AND TO ADDRESS REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (“POPI”)

This manual of Alpha Pharm (Pty) Ltd is available to view at the Company’s registered premises situated at 115 Fascia Street, Silvertondale, Pretoria, 0184.

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DOCUMENT MANAGEMENT

Date	Version	Description	Author
18 March 2024	1.0	First Release	Legal
20 June 2024	2.0	Second Release	CoSec
25 June 2026	3.0	Third Release	CoSec

1. INTRODUCTION & NATURE OF BUSINESS

Introduction

The Promotion of Access to Information Act, 2 of 2000 (“PAIA”) gives effect to the constitutional right of access to any information held by the State or a private body that is required for the exercise or protection of any rights. Section 51 of PAIA obliges private bodies to compile and maintain a manual outlining the categories of records they hold and the procedures required to request access to them.

Furthermore, the Protection of Personal Information Act, 4 of 2013 (“POPIA”) promotes the protection of personal information processed by public and private bodies (p. 2). POPIA mandates that a private body’s PAIA manual must integrate key POPIA components, including the purpose of processing, categories of data subjects, and the process for objecting to processing or requesting corrections or deletions.

This manual has been compiled in accordance with Section 51 of PAIA, as amended by POPIA (p. 2). It recognises that the Information Regulator is the statutory body responsible for regulating and enforcing compliance with both PAIA and POPIA

Nature of Business

The Company acts as a wholesaler of pharmaceutical products. The Company owns and franchises retail pharmacies which form part of the largest national group of independent community pharmacies.

Registered Entities

In this manual, any reference to “Alpha Pharm (Pty) Ltd” or “Company” includes the following entities:

1. **Alpha Pharm (Pty) Ltd** (Reg No: 1972/000895/07)
2. **Allied Drug Company (Pty) Ltd** (Reg No: 1966/011114/07)
3. **ACC PHARM (PTY) LTD** (Reg No: 2022/679358/07)
4. **Alpha Retail Pharmacies (Pty) Ltd** (Reg No: 1970/005492/07)
5. **CJ van Heerden (Pty) Ltd t/a Alpha Pharm Virginia Pharmacy** (Reg No: 1965/005217/07)
6. **Brent Schnell (Pty) Ltd t/a Alpha Pharm NU Pharmacy** (Reg No: 2026/048385/07)
7. **FM Coetzee (Pty) Ltd t/a Alpha Pharmacies – Wollies Pharmacy** (Reg No: 2018/548329/07)
8. **Ansfrere Pharmacy (Pty) Ltd t/a Alpha Pharm Pennington Pharmacy** (Reg No: 1960/002242/07)

9. **Jeffrey M Sack (Pty) Ltd t/a Gowrie Pharmacy** (Reg No: 2019/066284/07)
10. **LB Halgreen Associates (Pty) Ltd t/a Pharmacity Murray Square Pharmacy & Medicine Depot** (Reg No: 1997/014957/07)
11. **Alpha Corporate Retail (Pty) Ltd t/a Pharmacity** (Reg No: 2008/013009/07)
12. **Alpha Corporate Retail (Pty) Ltd t/a Alpha Pharm Protea Glen Pharmacy (Pty) Ltd** (Reg No: 2008/013009/07)
13. **Alpha Pharm Synergy (Pty) Ltd** (Reg No: 2019/112565/07)
14. **U GEN (Pty) Ltd** (Reg No: 2022/507057/07)
15. **Nutri Con (Pty) Ltd** (Reg No: 2017/471368/07)
16. **Alpha Pharm (KZN) (Pty) Ltd** (Reg No: 1956/001970/07)
17. **Alpha Pharm East Cape (Pty) Ltd** (Reg No: 1949/034831/07)
18. **Alpha Pharm East Cape Properties (Pty) Ltd** (Reg No: 1965/010286/07)
19. **Alpha Pharm Western Cape (Pty) Ltd** (Reg No: 2005/030816/07)
20. **Allied Pharmaceuticals Limited** (Reg No: 1978/001740/06)
21. **Plupart Investment Holdings (Pty) Ltd** (Reg No: 1898/004741/07)
22. **Akkerdal (Pty) Ltd** (Reg No: 1990/002364/07)
23. **Alpha Pharm Technologies (Pty) Ltd** (Reg No: 2005/023809/07)
24. **15 Radnor Street Investments (Pty) Ltd** (Reg No: 2008/0071681/07)
25. **Alpha Pharm Retail Promotions (Pty) Ltd** (Reg No: 1968/004999/07)

2. COMPANY CONTACT DETAILS

Alpha Pharm (Pty) Ltd Contact Details

- **Executive Chairman:** Jacobus DáNiel Nel
- **Information Officer:** Theo Hendrik Terblanche
- **Deputy Information Officer:** Nico Walter Shelver
- **Physical Address:** 115 Fascia Street, Silvertondale, Pretoria, 0184
- **Postal Address:** PO Box 1303, Silvertondale, Pretoria, 0127
- **Telephone Number:** 012-643 5840
- **Website:** [Alpha Pharmacies Website](#)

Information Regulator Contact Details

- **Chairperson:** Adv. Pansy Tlakula
- **Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

- **General Enquiries:** enquiries@inforegulator.org.za
 - **POPIA Complaints:** POPIAComplaints@inforegulator.org.za
 - **PAIA Complaints:** PAIAComplaints@inforegulator.org.za
 - **Telephone Number:** 010 023 5200 / 0800 017 160
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3. ACCESS TO RECORDS HELD BY THE COMPANY

Requester Types

Records held by the Company may be accessed on request only once the procedural requirements have been met. PAIA distinguishes between two types of requesters:

1. **Personal Requester:** A person seeking access to a record containing personal information about themselves. The Company will provide access subject to applicable law, and a prescribed reproduction fee will be charged.
2. **Other Requester:** A person entitled to request access to information pertaining to third parties. The Company is not obliged to grant access until all PAIA requirements are fulfilled and reproduction fees are paid.

Request Procedure

- Requesters must complete the prescribed form attached in **Appendix 1 (Form 2)** and submit it along with the request fee to the Information Officer.
- The form must provide sufficient particularity to identify the records, the identity of the requester, the form of access required, and the contact details of the requester.
- The requester must clearly state the constitutional right they are seeking to protect or exercise, and explain why the requested record is necessary to do so.
- If a request is made on behalf of another person, proof of the capacity in which the request is made must be submitted.
- If an individual cannot complete the form due to illiteracy or disability, the request may be made orally to the Information Officer.

Decision and Timelines

The Company will process a request within **30 days** of receipt. This period may be extended by up to another **30 days** if the request involves a large volume of information or requires a search at an outsourced office. Requesters will be notified in writing of any extension or final decision.

4. FEES

PAIA provides for two types of fees:

1. **Request Fee:** A standard, non-refundable fee payable by all requesters (except personal requesters) before the request can be processed.
2. **Access Fee:** A fee calculated to cover reproduction costs, search and preparation time, and postage where applicable.
 - If a search and preparation process requires more hours than prescribed by regulations, the Information Officer will notify the requester to pay a deposit before proceeding.
 - The Information Officer will withhold the record until all applicable fees are paid.
 - If a deposit is paid for a request that is ultimately refused, the deposit will be refunded to the requester.

5. CATEGORIES OF RECORDS HELD BY THE COMPANY

Note: Accessibility to these records may be subject to the grounds of refusal outlined in Section 7.

Personnel Records

“Personnel” includes directors, permanent, temporary, part-time, and contract workers.

- Personal records provided directly by personnel.
- Records provided by third parties relating to personnel.
- Conditions of employment and contractual/quasi-legal records.
- Internal evaluation records, training schedules, and materials.
- Correspondence relating to personnel.

Customer Related Records

“Customer” refers to any natural or juristic entity receiving services from the Company.

- Records provided by a customer to a third party acting on behalf of the Company.
- Records generated within the Company relating to customers, including transaction histories.
- Records provided by third parties.

Private Body & Statutory Records

- Documents of incorporation and Memorandum of Incorporation (MOI).
- Minutes of Board of Directors meetings.
- Records relating to the appointment of Directors, auditors, secretary, or public officers.
- Share Register and other statutory registers.
- Operational databases, IT infrastructure data, and marketing records.
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Financial & Tax Records

- Annual Financial Statements and Accounting Records.
- Bank Statements and electronic banking records.
- Asset Register and rental/lease agreements.
- PAYE records and tax returns.
- Records of payments made to SARS on behalf of employees.
- Statutory compliance records (VAT, Skills Development Levies, UIF, Workmen's Compensation).

Records Available Without Formal Request

Records of a public nature (e.g., information disclosed on the website or in annual reports) can be accessed without formal application. Non-confidential statutory records held at CIPC may also be viewed by making an appointment with the Information Officer.

6. PROCESSING OF PERSONAL INFORMATION (POPIA)

Alpha Pharm (Pty) Ltd takes privacy seriously and processes personal information strictly in accordance with South African data privacy principles.

Purpose of Processing

The Company processes personal information for purposes including, but not limited to:

- Providing and managing requested products and services.
- Identifying data subjects, maintaining customer records, and general administration.
- Recruitment, employment, payroll, and health and safety management.
- Managing premises security and access control.
- Transacting with suppliers, recovering debts, and business analysis/profiling.
- Legal, compliance, financial, and tax purposes.

Categories of Data Subjects and Information Processed

Data Subject Category	Personal Information Processed
Customers & Clients (Juristic)	Names of contact persons, legal entity name, registration number, physical/postal addresses, financial info, tax status, founding documents, authorised signatories, ultimate beneficial owners.
Customers & Clients (Natural)	Full names, identity number, contact details, physical/postal addresses, tax-related info, confidential correspondence.
Employees / Directors	Gender, pregnancy, marital status, age, language, education, banking details, employment history, ID number, addresses, criminal checks, well-being, disability status, training records, health and safety logs, payroll, time/attendance records.
Suppliers	Contact person names, legal name, addresses, financial records, registration numbers, tax info, authorised signatories, beneficiaries.
Job Applicants	Curricula Vitae (CVs), application forms, criminal and background checks.

Data Recipients and Third-Party Sharing

The Company may share personal information with service providers who perform functions on its behalf, such as:

- Data capturing, organisation, and storage.
 - Electronic correspondence and communication distribution.
 - Due diligence checks and Collective Investment Schemes administration.
- Information is not shared with external third parties unless required for legal/regulatory compliance, fraud prevention, service delivery, or with explicit data subject consent.

Planned Transborder Flows

The Company will only transfer personal information across South African borders if required by business transactions and executed in compliance with legislative safety rules, or with the explicit consent of the data subject.

Information Security Measures

To maintain data confidentiality and integrity, Alpha Pharm implements secure technical controls, including:

- Up-to-date firewalls and antivirus protection software protocols.
- Strict logical and physical access control to infrastructure.
- Secure configuration of hardware and software IT environments.
- Binding contractual obligations on outsourced service providers to implement equivalent security measures.

7. REMEDIES AVAILABLE IF A REQUEST IS REFUSED

Internal Remedies

The Company does not have an internal appeal procedure. The decision made by the Information Officer is final.

External Remedies

If a requester is dissatisfied with a refusal, or a third party is dissatisfied with a grant of information, they may apply to a court for relief within **30 days** of notification. Courts with jurisdiction include the Constitutional Court, High Court, or any court of similar status.

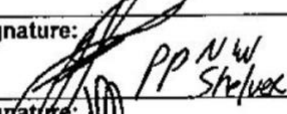
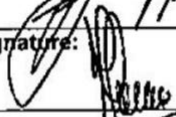
8. LIST OF APPLICABLE LEGISLATION

Records are maintained in accordance with provisions from the following legislation (where applicable):

- Basic Conditions of Employment Act 57 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of the Republic of South Africa, 1996
- Copyright Act 98 of 1978
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Medicines and Related Substances Act 101 of 1965
- National Credit Act 34 of 2005
- Occupational Health and Safety Act 85 of 1993
- Pharmacy Act 53 of 1974
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Levies Act 97 of 1998
- Value Added Tax Act 89 of 1991

9. AVAILABILITY AND APPROVAL

The Information Regulator has compiled a Guide, in terms of Section 10 of PAIA, containing information that may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. This Guide is available in all official languages and can be accessed directly on the website of the Information Regulator (<https://info regulator.org.za>) or by requesting a copy from the Company's Information Officer.

Approved by Executive Chairman: Jacobus DáNiel Nel	Signature:  PP N W Steyn	Dated: 30 / 06 / 2026
Approved by Information Officer: Theo Hendrik Terblanche	Signature: 	Dated: 29 / 06 / 2026.

APPENDIX 1: PRESCRIBED FORM 2

REQUEST FOR ACCESS TO RECORDS

(Regulation 7)

NOTE:

Proof of identity must be attached by the requester.

If a request is made on behalf of another person, proof of such authorisation must be attached to this form.

A. PARTICULARS OF THE PRIVATE BODY

To: The Information Officer

Company: Alpha Pharm (Pty) Ltd

Address: 115 Fascia Street, Silvertondale, Pretoria, 0184

Email Address: cosec@alphapharm.co.za

B. PARTICULARS OF THE REQUESTER (PERSON REQUESTING ACCESS)

Full Names and Surname: _____

Identity Number: _____

Capacity (e.g., Parent, Legal Practitioner): _____

Postal Address: _____

Street Address: _____

Telephone Number: _____ **Cell Number:** _____

E-mail Address: _____

C. PARTICULARS OF THE PERSON ON WHOSE BEHALF THE REQUEST IS MADE

(This section must be completed ONLY if the request for information is made on behalf of another person)

Full Names and Surname: _____

Identity / Registration Number: _____

D. PARTICULARS OF RECORD REQUESTED

(Provide full details to enable the record to be located. If the space is inadequate, please continue on a separate page and sign every page.)

Description of record / part of the record:

Reference number (if applicable):

Any further particulars of the record:

E. TYPE OF RECORD

(Mark the appropriate box with an "X")

- Written or printed record
- Visual images (photographs, slides, video recordings, computer-generated images)
- Recorded words or information that can be reproduced in sound
- Held on a computer or in an electronic or machine-readable form

F. FORM OF ACCESS

(Mark the appropriate box with an "X")

- Printed copy of record (including transcriptions)
- Inspection of the record at the registered premises
- Copy of the record on a flash drive (USB) or compact disc (CD)
- Electronic copy via email or cloud transfer

G. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

(If the space is inadequate, please continue on a separate page and sign it.)

Indicate which right is to be exercised or protected:

Explain why the record requested is required for the exercise or protection of the right:

H. MANNER OF NOTICE OF DECISION

You will be notified in writing whether your request has been approved or denied. Please state your preferred language and communication method:

Preferred Language: _____

Manner of Notification (e.g., Email, Post): _____

Signed at _____ this ____ day of _____ 20__

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE