DR JONATHAN BOLON GASTROENTEROLOGY INC.

(Personal Liability Company / Inc)

CIPC Reg No. 2021/844754/21

PAIA MANUAL

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

DATE OF COMPILATION: 2026-05-08

DATE OF REVISION: 2026-07-14

Version 1.2 (revised 2026-07-14, signed 2026-07-14)

1. List of Acronyms and Abbreviations

CEO	Chief Executive Officer
CIPC	Companies and Intellectual Property Commission
DIO	Deputy Information Officer
HPCSA	Health Professions Council of South Africa
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Practice	Dr Jonathan Bolon Gastroenterology Inc.
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa

2. Purpose of this PAIA Manual

This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended). It is intended to enable any person to:

1. check the categories of records held by the Practice that are available without a formal PAIA request being submitted;
2. understand how to make a formal request for access to a record held by the Practice;
3. identify the records of the Practice that are made available in accordance with any other legislation;
4. contact the Information Officer (or Deputy Information Officer, if any) for assistance;
5. access the Information Regulator's Guide on how to use PAIA;
6. understand the categories of personal information that the Practice processes, the purposes of processing, the categories of data subjects and the recipients of personal information; and
7. understand the security measures that the Practice has implemented to protect personal information.

3. Key Contact Details for Access to Information

3.1 Head of the Private Body / Chief Information Officer

Full Name	Dr Jonathan Graham Bolon
Position	Director / Principal
Information Officer Registration No.	2026-013387
Information Officer Appointment Date	2021-08-30
Telephone	**010 900 4380**
Email	**privacy@gi-bolon.com**
Fax	**Not available**

3.2 Deputy Information Officer

Full Name	**Not applicable (solo practice; no Deputy Information Officer appointed)**
Position	**Not applicable**
Telephone	**Not applicable**
Email	**Not applicable**
Fax	**Not applicable**

3.3 General Access-to-Information Contact

Email for PAIA requests	**privacy@gi-bolon.com**

3.4 Head Office

Postal Address	**Not applicable (correspondence by email, or by post addressed to the physical address)**
Physical Address	**Mediclinic Morningside, Corner Hill Road and Rivonia Road, Morningside, Sandton, 2057**
Telephone	**010 900 4380**
Email	**admin@gi-bolon.com**
Website	**https://www.gi-bolon.com**

4. Guide on How to Use PAIA and How to Obtain Access to the Guide

4.1 In terms of section 10(1) of PAIA, as amended, the Information Regulator has updated and made available a revised Guide on how to use PAIA ("the 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 the Protection of Personal Information Act 4 of 2013 (POPIA).

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

4.3 The Guide contains, among other things, descriptions of:

- the objects of PAIA and POPIA;
- the postal and physical address, telephone, fax and electronic mail address of the Information Officer of every public body and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for access to a record of a public body (section 11) and a private body (section 50);
- the assistance available from the Information Officer of a public body and from the Information Regulator;
- 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 an internal appeal, a complaint to the Regulator, and an application to court;
- the provisions of sections 14 and 51 requiring a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and a private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.

4.4 The Guide may be inspected during normal office hours at the offices of the Information Regulator and at the head office of the Practice.

4.5 The Guide may also be obtained:

- on request to the Information Officer of the Practice; or
- from the Information Regulator's website at https://inforegulator.org.za.

4.6 A copy of the Guide is available at the head office of the Practice in the following two official languages: English and Afrikaans.

5. Records of the Practice Available Without a Formal PAIA Request

In terms of section 52 of PAIA, the Practice voluntarily makes the following categories of records available to the public:

Category of Records	Types of Record	Website	On Request
Practice profile	Practitioner CV, areas of clinical interest, hospital affiliations, professional memberships	X	X

Patient information leaflets	Pre-procedure preparation instructions; condition-specific patient handouts		X
Practice fees and billing structure	Schedule of consultation and procedure fees; medical-aid status		X
Privacy notice	POPIA section 18 privacy notice describing how patient personal information is processed	X	X
PAIA Manual	This document	X	X
Complaints procedure	Information on how to lodge a complaint with the Practice and with the HPCSA		X

6. Records Available in Accordance with Other Legislation

The Practice creates and holds records in accordance with the following legislation. Access to such records is governed first by the relevant legislation and, where applicable, also by PAIA.

Category of Record	Applicable Legislation
Memorandum of Incorporation; CIPC annual returns; CoR forms	Companies Act 71 of 2008
Patient clinical records (consultation notes, procedure reports, pathology, imaging, correspondence)	National Health Act 61 of 2003; HPCSA Booklet 14 (Confidentiality and Health Records)
Records of patient consent for procedures	National Health Act 61 of 2003; HPCSA Booklet 9 (Informed Consent)
Notifiable medical condition records	National Health Act 61 of 2003; National Health Regulations on Notifiable Medical Conditions, 2017
PAIA Manual	Promotion of Access to Information Act 2 of 2000
PAIA Annual Reports	Promotion of Access to Information Act 2 of 2000, section 32
Records of personal information processing; operator agreements; security compromise reports	Protection of Personal Information Act 4 of 2013
Tax records (VAT, PAYE, provisional tax, IT returns, supporting documents)	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Employee records (contracts, payroll, leave, UIF, COIDA)	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Unemployment

	Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993
BHF practice number registration; medical-scheme accreditation records	Medical Schemes Act 131 of 1998
HPCSA registration; CPD records; ethics certifications	Health Professions Act 56 of 1974
Schedule 5 / Schedule 6 medicine register (if applicable)	Medicines and Related Substances Act 101 of 1965
Occupational Health and Safety records (if applicable)	Occupational Health and Safety Act 85 of 1993

7. Subjects on which the Practice Holds Records and Categories of Records Held

Subject	Categories of Records
Clinical care	Patient demographics, medical history, examination findings, diagnoses, investigation results (laboratory, imaging, pathology, endoscopy reports, manometry, motility, capsule), treatment records, prescriptions, procedure consent forms, operative notes, follow-up records, referral correspondence, GP letters, multidisciplinary team correspondence.
Billing and revenue	Invoices, receipts, medical-scheme submissions, ICD-10 and procedure coding, accounts payable and receivable, debtor records, write-offs.
Human resources	Employment contracts, job descriptions, payroll records, leave records, performance records, disciplinary records, UIF and COIDA records, training records.
Procurement and suppliers	Supplier contact details, contracts, invoices, payments, equipment maintenance records, consumable orders.
Regulatory and statutory	HPCSA registration, CIPC records, SARS records, BHF records, Information Regulator records (this manual; IO registration; PAIA annual reports; security compromise reports), HPCSA CPD records.
Practice operations	Standard operating procedures, infection-control records, medical-waste disposal records, equipment service records, lease and utility records.
Insurance and indemnity	Medical-malpractice indemnity policy (Medical Protection Society), property and business-interruption insurance, professional liability records.
Personal information processing register	Operator agreements (POPIA s.21), data flow records, security incident register, retention schedule.

8. Processing of Personal Information

8.1 Purpose of Processing Personal Information

The Practice processes personal information for the following purposes:

8. the provision of clinical care, including assessment, diagnosis, treatment, follow-up and continuity of care;
9. billing for services rendered, submission of claims to medical schemes, and recovery of fees;
10. statutory and regulatory reporting (HPCSA, SARS, the Department of Health, the Information Regulator);
11. compliance with the Practice's obligations as an employer (UIF, COIDA, payroll, PAYE);
12. management and administration of the Practice (procurement, supplier management, equipment maintenance, insurance);

13. audit and quality improvement, including morbidity and mortality review (de-identified);
14. response to complaints, professional disciplinary processes, and medico-legal claims;
15. communications with patients and referring practitioners about appointments, results and care.

8.2 Categories of Data Subjects and Personal Information

The Practice processes personal information of the following categories of data subjects:

Category of Data Subject	Personal Information Processed
Patients	Name, identity number, date of birth, sex, contact details (postal, residential, telephone, email), next-of-kin details, medical-scheme details, employer details (where relevant for billing), and special personal information being health-related information (medical history, examination findings, diagnoses, investigation results, treatment records, procedure records, correspondence, photographs and video where clinically indicated).
Parents / guardians of paediatric patients	Name, identity number, contact details, relationship to patient, evidence of authority where required.
Referring and treating practitioners	Name, professional registration number, practice address, telephone, fax, email.
Employees and contractors	Name, identity number, contact details, banking details, qualifications, professional registration where applicable, employment history, payroll information, performance and disciplinary records.
Suppliers and service providers	Name of organisation and contact persons, registration numbers (CIPC, VAT), banking details, contact details, contractual records.
Visitors and complainants	Name, contact details, nature of communication, records of correspondence.

8.3 Recipients or Categories of Recipients

Personal information may be supplied to the following recipients, only for the purposes stated and in accordance with POPIA:

Category of Personal Information	Recipient or Category of Recipient
Patient demographic and clinical data, for billing	Medical schemes; the medical-aid switch; the Practice's accountant; debt-collection agency where instructed.
Patient clinical data, for continuity of care	Referring and treating practitioners; multidisciplinary team members; allied health professionals where directly involved in the patient's care.
Patient clinical data, for statutory reporting	Department of Health (notifiable medical conditions); SAPS where required by law (e.g.

	gunshot wounds, certain injuries); HPCSA in response to a complaint or inquiry.
Patient clinical data, for laboratory and imaging investigations	Pathology laboratories (Ampath, Lancet, NHLS); radiology practices; anatomical pathology services.
Patient clinical data, for pharmacy	Dispensing pharmacy where the prescription is filled.
Personal information of patients and staff, for IT and administrative support	Practice management software vendor (Healthbridge or equivalent); IT support contractor; cloud backup provider.
Patient clinical data, for indemnity and legal purposes	Medical Protection Society (or equivalent indemnifier); the Practice's legal representatives, where instructed.
Employee personal information, for statutory and payroll purposes	SARS; UIF; COIDA; pension and provident fund administrators; the Practice's payroll provider.
Practice records, for tax and audit purposes	SARS; the Practice's auditors and accountants.

8.4 Planned Transborder Flows of Personal Information

Personal information processed by the Practice may, in the course of normal IT operations, be hosted on or transmitted through systems whose servers are located outside the Republic of South Africa. The Practice has identified the following planned transborder flows:

- **Email and document hosting via Google Workspace (Gmail, Google Drive, Google Docs and Sheets); Google data centres are located in the United States and in other regions; data subject categories: patients, parents and guardians of paediatric patients, referring and treating practitioners, employees and contractors, suppliers and service providers, visitors and complainants; categories of personal information: as listed in section 8.2.**
- **Cloud backup and personal-device synchronisation of practice data via Apple iCloud; Apple data centres are located in the United States and in other regions; data subject categories and categories of personal information as for the line above.**
- **Clinical documentation support via Anthropic (Claude, accessed through Cowork mode); inference is performed on Anthropic infrastructure located predominantly outside the Republic of South Africa (United States); data subject category: patients; categories of personal information: patient name, date of birth and clinical information contained in the correspondence, file notes and reports drafted with the tool, which constitutes special personal information; processed under a written operator arrangement providing an adequate level of protection in terms of section 72(1)(a).**
- **Ambient clinical documentation via Heidi Health Trading Pty Ltd (Heidi Scribe); consultation audio and the resulting draft clinical notes may be processed on vendor infrastructure outside the Republic of South Africa; data subject category: patients; categories of personal information: consultation audio processed in real time (not retained) and the clinical information in the resulting notes, which constitutes special personal information; processed under the operator's written data-processing terms providing an adequate level of protection in terms of section 72(1)(a).**

- **The Practice does not engage in any other planned transborder flows of personal information beyond those listed above.**

In each case, the Practice ensures, in accordance with section 72 of POPIA, that personal information is transferred only where the third party in the foreign country is subject to a law, binding corporate rules or binding agreement that provides an adequate level of protection of personal information; or where the data subject consents to the transfer; or where the transfer is necessary for the performance of a contract.

8.5 Information Security Measures

The Practice has implemented the following technical and organisational security measures to ensure the confidentiality, integrity and availability of personal information, in line with section 19 of POPIA:

Technical measures

- Full-disk encryption on all Practice laptops and mobile devices.
- Strong password policies and, where supported, multi-factor authentication for cloud services and remote access.
- Anti-virus and anti-malware software on all Practice devices, with automatic updates enabled.
- Encrypted offline backups of clinical and business records.
- Access controls limiting staff access to personal information on a need-to-know basis.
- Secure transmission of patient information using the medical-aid switch, secure messaging within the practice management system, or password-protected attachments.

Organisational measures

- Written privacy notice issued to patients in terms of section 18 of POPIA.
- Written operator agreements in terms of section 21 of POPIA with all third parties processing personal information on behalf of the Practice.
- Documented retention schedule consistent with HPCSA Booklet 14 (clinical records retained at least 6 years after last treatment, or for minors until age 21 plus 6 years).
- Staff training and confidentiality undertakings.
- Documented procedure for the identification, investigation, internal escalation and notification of security compromises in terms of section 22 of POPIA.
- Regular review of security measures by the Information Officer.

9. Availability of this Manual

9.1 This Manual is available:

- on the Practice website at https://www.gi-bolon.com;
- at the head office of the Practice, for public inspection during normal business hours;
- to any person on request, on payment of a reasonable prescribed fee per A4 photocopy as set out in Annexure B to the Regulations relating to the Promotion of Access to Information, 2021; and
- to the Information Regulator on request.

10. Updating of the Manual

The head of the Practice will review and update this Manual on a regular basis and at least once in every reporting period in which the Practice submits its PAIA Annual Report to the Information Regulator. The date of compilation and the date of the most recent revision are recorded on the cover page.

Signature

Signature
Jonathan Bolon - 0826294

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Dr Jonathan Graham Bolon
Information Officer
Director: Dr Jonathan Bolon Gastroenterology Inc.
IO Registration Number: 2026-013387

Date: ____2026-07-14 _____

Place: ___Bryanston_____