



Promotion of Access to Information Manual Ithaca Technologies

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT 2 OF 2000 (PAIA) AS AMENDED





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Document Administration

History

Revision date	Document version	Summary of changes	Author
August 2025	V1	Created	Information Officer
October 2025	V2	Revised	Information Officer

Document References

Document name	Location
Ithaca Privacy Policy	Ithaca Privacy Policy www.ithaca.co.za
PAIA Guidelines	Information Regulator of South Africa https://inforegulator.org.za/paia-guidelines/
PAIA Act 2 of 2000 – as amended	Information Regulator of South Africa https://inforegulator.org.za/acts/

List of acronyms and abbreviations

Acronyms and Abbreviations	Description
CEO	Chief Executive Officer
DIO	Deputy Information Officer
Company, We, Our	Ithaca Technologies
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act, Act No. 2 of 2000 as amended
POPIA	Protection of Personal Information Act, Act No. 4 of 2013
Regulations	Regulations relating to both PAIA and POPIA as published by the Information Regulator
Regulator	Information Regulator
Republic	Republic of South Africa



Introduction

Your privacy is very important to us and Ithaca Technologies is committed to protecting your right to privacy as well as your right to access any information that we have about you.

We operate as follows: When you get transported in an ambulance or emergency vehicle, the paramedics will collect information on you such as your name, what medical assistance you receive from them and other data that is connected with that. They use our system to collect this information and we process it for them in terms of a contract. This data is available only to them and the parties that they have to share it with, like the hospital they take you to. Because of this we may have some of your information but we will **NEVER** exploit it, sell it, or make it available to anyone, other than what is required under law.

This access to information manual ('Manual') is prepared in compliance with the Promotion of Access to

Information Act, 2 of 2000 (PAIA) and the Protection of Personal Information Act, Act 4 of 2013 ('POPIA'). In terms of this legislation, everyone has the right to access their information that is processed by a private body.

The purpose of this Manual is to enable requesters to gain access to the records to which they are entitled in a quick and easy way.

PAIA aims to give effect to the constitutional right of everyone in South Africa's to access their information held by a public or a private body. This information can be accessed to exercise or protect any right contained in the Bill of Rights.

The main objective of POPIA is to promote the protection of personal information processed by public and private bodies. POPIA amended certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information.

When a request is made, we are obliged to honour it, except where the law expressly says that the information must not be released. If this is the case, we will let you know.

It is important to note that PAIA recognises certain limitations to the right of access to information, which includes:

- The reasonable protection of the right to privacy.
- Commercial confidentiality.
- Effective, efficient, and good governance.

The limitation should be in a manner that balances that right of access to information with any other rights.



Access to the Manual

In line with the law, this Manual serves as our access to information manual and provides information on both the types and categories of records held by us. This includes the following:

- A description of the records held by and on behalf of Ithaca Technologies
- The procedure to be followed when requesting access.
- Any fees payable when requesting access to any of these records.

A copy of the Manual is available:

- On our website (<https://www.ithaca.co.za>)
- At the head office of Ithaca Technologies for public inspection during normal business hours.
- To any person upon who request and upon the payment of a reasonable prescribed fee.
- To the Information Regulator upon request.

The purpose of the access to information manual

- Check which categories of records we hold without having to submit a formal (PAIA) request.
- Understand how to make a request for access to a record that we may hold, by providing a description of the subjects on which Ithaca Technologies holds records of, and the categories of records held on each subject.
- Know the description of the records of Ithaca Technologies which are available in terms of any other legislation.
- Access all the relevant contact details of the Information Officer (IO) and Deputy Information Officer (DIO) who will assist the public with the records they intend to access.
- Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- Know if Ithaca Technologies 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.
- Know the description of the categories of data subjects and of the information or categories of information.
- Know the recipients or categories of recipients to whom the personal information may be supplied.
- Know if Ithaca Technologies 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.
- Know whether Ithaca Technologies has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.



Details of Ithaca Technologies

Website	www.ithaca.co.za
Contact details	info@ithaca.co.za
Physical Address & Postal Address	485 on Dawn Street Lynnwood Pretoria
Information Officer	Niel Sadie Info@ithaca.co.za
Access to information requests	Please address the email as “PAIA request” info@ithaca.co.za

Guide on how to use PAIA

The Information Regulator has, in terms of section 10 (1) of PAIA, as amended, updated, and made available the revised Guide on how to use PAIA (the Guide) easily, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

This Guide is available in the official languages.

The Guide contains the following information:

- The objectives of PAIA and POPIA.
- How to request access to a record of a private body contemplated in section 50 of PAIA.
- The assistance available from the Regulator in terms of PAIA and POPIA.
- 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 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.
- The provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- The provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- The notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid for requests for access.



- The regulations made in terms of section 92 of PAIA.
- 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.
- The Guide can also be obtained upon request to the Information Officer
- From the website of the Regulator (see: <https://info regulator.org.za/paia-guidelines/>)

Information which Ithaca Technologies holds

Categories which are available without having to request

Category of records	Type of record	Available Online	Available by request
Commercial	Client who uses our platform Reviews	X	X
Legal	Privacy policy PAIA Manual Cookie policy	X	X

Categories which are held in terms of legislation

Category	Type of Record	Legislation
Governance	MOI Shareholder agreement Share register Meeting minutes Resolutions passed	Companies Act 2008
Employee	Employment contracts Employee records	Basic Conditions of Employment Act 1997 Labour Relations Act 1995 Employment Services Act 2014
Financial	Financial statements Invoices Financial records	Income Tax Act 1962
Legal	Privacy policy PAIA Manual	Protection of personal information act 2013 Promotion to access to information Act 2000
Regulatory	Patient data	Health Act 2003



Description of data subjects we have and the categories of records pertaining to them

Subject	Category of record
Employees	Employment records and publicly available information
Prospective employee	Information that you give us and publicly available information
Financial records	Financial statements
Clients	Client business data Client employee information Client business asset data
Patients of EMS	Patient Forms- Personal information such as name & surname Special personal information such as health information

Purpose for Processing

We process information to:

- Develop, monitor, and improve our systems and processes.
- To communicate with our clients, vendors, service providers, etc.
- To resolve complaints or queries.
- To fulfil our legal or contractual obligations.
- Comply with codes of conduct and industry agreements.
- Ensure that our clients are compliant with relevant laws.

The recipients or category of recipients to whom information may be supplied

Category of information	Recipients or category of recipients
Our information	Government or regulatory bodies as required
Personal information as required to meet purpose specification. e.g. name, surname, contact details, transactional information, call recordings, etc	Third parties with whom Ithaca Technologies have a contractual relationship for the processing of data (for example, a third-party archiving service, payment provider, and service providers)
Commercial or financial records or as required to meet purpose specification	Auditing and accounting bodies (internal and external)
Personal information as requested, subject to the provisions of PAIA and POPIA	Anyone making a successful application for access in terms of PAIA and POPIA



Planned transborder flows of information

Ithaca Technologies may transfer personal information outside South Africa to:

- Communicate using an email address which may be hosted outside the Republic.

We will ensure that any authorised party that we pass personal information to for processing is subject to a binding agreement or is required by local data protection law or regulation to treat personal information with the same level of protection as we are obliged to.

General description of information security measures to be implemented by us to ensure the confidentiality, integrity, and availability of information

Ithaca Technologies takes extensive information security measures to ensure the confidentiality, integrity, and availability of personal information in its possession or under its control. Ithaca Technologies takes appropriate technical and organisational measures designed to ensure that personal data remains protected and secure against unauthorised or unlawful processing or access and against accidental loss, destruction, or damage.

Personal information is stored on secured local servers, personal computers, and mobile devices.

A range of physical, electronic, and other security measures have been deployed to protect the security, confidentiality, and integrity of the personal information that we hold. Examples include the following:

- We control access to our information systems is controlled through identity and access management controls.
- Data is transferred using industry best practices.
- Employees and our contracted service providers are bound by internal information security policies and must process information securely.
- All employees must complete training about privacy and information security.
- We regularly monitor and review our compliance with internal policies and industry best practice.

Availability of this Manual

A copy of this Manual is available:

- On our website at www.ithaca.co.za;
- At the head office of Ithaca Technologies for public inspection during normal business hours
- To any person upon request and upon the payment of a reasonable prescribed fee
- To the Information Regulator upon request.



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. Electronic versions will be available free of charge.

Access procedure

A requester requiring access to information held by Ithaca Technologies must complete the Access Request Form (found on the Information Regulator's website). If a manual form is completed it must be submitted to the Information Officer at the postal address, physical address or email address provided. The requester must pay an access request fee (and a deposit, if applicable) unless that fee is waived by the Information Officer.

The Access Request Form must contain sufficient details to enable the Information Officer to identify the following:

- The records requested.
- The proof of identity of the requester.
- The form of access required if the request is granted.
- The email address, postal address, or fax number of the requester.
- If the request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request. This information must be to the reasonable satisfaction of the Information Officer and the requester must clearly disclose the right they wish to protect.
- If a person is unable to complete the prescribed form because of illiteracy or disability, they may make the request orally.
- The requester will be informed whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, the requester must state the manner and the particulars so required.

A copy of the forms can be downloaded from the Information Regulator's website at:

<https://info regulator.org.za/paia-forms/>.

Third-party notification

Ithaca Technologies will take all reasonable steps to inform a third party to whom a requested record relates if the disclosure of that record would involve the disclosure of any of the following:

- Personal information about that third party
- Trade secrets of that third party
- Financial, commercial, scientific, or technical information (other than trade secrets) of that third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party.
- Information supplied in confidence by a third party, the disclosure of which could



reasonably be expected to put that third party at a disadvantage in contractual or other negotiations.

- Information about research being, or to be, carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research, to serious disadvantage.

In addition, Ithaca Technologies will take all reasonable steps to inform a third party to whom a requested record relates if the disclosure of that record would lead to any of the following:

- Prejudice to that third party in commercial competition.
- An action for breach of a duty of confidence owed to a third party in terms of an agreement.

Ithaca Technologies will inform the third party as soon as reasonably possible, but in any event, within 21 days after that request is received. Within 21 days of being informed of the request, the third party may do one of the following:

- Make written or oral representations to the Information Officer, explaining why the request for access should be refused;
- Give written consent for the disclosure of the record to the requester. Ithaca Technologies will notify the third party of the outcome of the request. If the request is granted, adequate reasons for granting the request will be given.

The third party may lodge a complaint to the Information Regulator or an application with a court against the decision within 30 days after notice is given.

Grounds for refusal of access to records

Ithaca Technologies may refuse a request for information on the following basis:

- Mandatory protection of the personal information, special personal information, or privacy of a third party who is a natural person, or juristic person, if supplying the information would involve the unlawful or unreasonable disclosure of personal information of that person;
- Mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets or intellectual property of that third party;
 - Financial, commercial, scientific, or technical information, if the disclosure would likely cause harm to the financial or commercial interests of that third party;
- Information disclosed in confidence by a third party to Ithaca Technologies if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement or legislation.



- Mandatory protection of the safety of individuals and the protection of property
- Mandatory protection of records that would be regarded as privileged in legal proceedings.
- Protection of the commercial information of Ithaca Technologies, which may include:
 - Trade secrets of Ithaca Technologies
 - Intellectual property of Ithaca Technologies
 - Financial information that, if disclosed, could put Ithaca Technologies at a disadvantage in negotiations or commercial competition.
- A computer program, algorithm, actuarial modelling, or application that is owned by Ithaca Technologies.
- Protection of the research information of Ithaca Technologies or a third party, if its disclosure would disclose the identity of the institution, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- The request is clearly frivolous or involves an unreasonable diversion of resources.

Refusal when the record cannot be found

If all reasonable steps have been taken by Ithaca Technologies to find the record requested by the requester and it cannot be found for reasons justifiable in terms of section 55 of PAIA, the Information Officer shall provide an affidavit or affirmation to the requester advising that it is not possible to give access to the record requested.

If the record is found subsequently, the Ithaca Technologies undertakes to contact the requester to gain access to it, after the payment of the applicable access fee and subject to the provisions of this Manual.

Remedies available if we refuse access to a record

The decision of the Information Officer is subject to an appeal. If the requester is dissatisfied with the reasons, they may email the Information officer the reasons for their dissatisfaction who will escalate the matter to the CEO and send confirmation of escalation to the requester. The decision made during the appeal process is final and binding. Requesters who are still dissatisfied may exercise external remedies at their disposal. All complaints by a requester or a third party can be made to the Information Regulator or a court of law, in the manner prescribed in the paragraphs below.

Complaints to the Information Regulator

The requester or third party may submit a complaint in writing to the Information Regulator, within 180 days of the decision to refuse a request for information, alleging that the decision was not in compliance with the provisions of the legislation. The Information Regulator will investigate the complaint and reach a decision, which may include a decision to investigate, to take no further action, to conciliate the matter, or to refer the complaint to the Enforcement Committee. The Information Regulator may serve an enforcement notice confirming,



amending, or setting aside the impugned decision, which must be accompanied by reasons.

Application to Court

An application to court may be brought in the ordinary course. For this purpose, any reference to an application to court includes an application to a relevant magistrate's court.

Updating of the Manual

This manual will be kept up to date. The version and date that it was updated will be included in this manual.

Prescribed Fees

Payment of Fees

Payment details can be obtained from the Information Officer. Payment can be made by direct deposit into the nominated Ithaca Technologies bank account. Proof of payment must be attached to the Access Request Form along with the other required documentation.

The following fees are (or may be) payable:

- Request fee
- Access fee
- Reproduction fee

Request fee

The requester must pay an initial request fee when submitting the Access Request Form. The prescribed fee is set out below.

Access fee

If the request for access is successful, an access fee must be paid prior to the release of the records by us. This fee is for the search, reproduction, and preparation of the record(s). The access fee will be calculated based on the prescribed fees set out below.

Reproduction fee

This fee applies to documents or records that are voluntarily disclosed. This is for reproduction, copying and transcribing the relevant documents or records. The reproduction fee will be



calculated based on the prescribed fees set out below.

Deposit

If the search for, and the preparation of, the record for disclosure would, in the opinion of the Information Officer, require more than 6 hours, the requester may be required to pay as a deposit one third of the access fee (the fee which will be payable if the request is granted).

If a deposit has been paid in respect of a request for access which is subsequently refused, then the Information Officer must refund the deposit in full to the requester.

The requester must pay the prescribed fee before any processing, or any further processing, can take place.

Ithaca Technologies reserves the right to waive the fees payable subject to the type and categories of information requested as well as the effort required to provide access to the requested information. The requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request and access fees or deposit if we decline the requester's request to waive the fees.

Where Ithaca Technologies receives a request for access to information held on a person other than the requester and the Information Officer, upon receipt of the request, is of the opinion that the preparation of the required record of disclosure will take more than 6 hours, a deposit is payable to the requester.

The amount of the deposit is equal to one third of the amount of the applicable access fee.

Please note: In terms of Regulation 8, value-added tax (VAT) must be added to all fees prescribed in terms of the Regulations. Therefore, the fees reflected below include VAT.

REPRODUCTION FEES	
If a record has been provided, it may be reproduced freely.	
Applicable fees for reproduction (including VAT)	Amount in rand
For every photocopy of an A4-size page or part thereof	2.00
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	2.00
For a copy in a computer-readable form on a flash drive	40.00
Provided by the requester	
Provided by us	
For a copy in a computer-readable form on a flash drive provided by the requester	40.00
A transcription of visual images for an A4-size page or part thereof	Service to be outsourced. Cost will depend on the quotation from a service provider



For a copy of visual images	Service to be outsourced. Cost will depend on the quotation from a service provider
For a transcription of an audio record, for an A4-size page or part thereof	24.00
For a copy of an audio record on Flash drive (to be provided by the requester)	40.00
REQUEST FEES	
Request fee payable by every requester	0
ACCESS FEES	
An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act, or an exclusion is determined by the Minister in terms of section 54(8).	
Applicable fees (including VAT)	Amount in Rand
For every photocopy of an A4-size page or part thereof	2.00

For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	2.00
Applicable fees for a copy in a computer-readable form (including VAT)	Amount in Rand
For a transcription of visual images for an A4-size page or part thereof	Service to be outsourced. Cost will depend on the quotation from a service provider
For a copy of visual images	Service to be outsourced. Cost will depend on the quotation from a service provider
For a transcription of an audio record, for an A4-size page or part thereof	24.00
For a copy of an audio record Flash drive provided by the requester Flash drive provided by us	40.00 60.00
To search for a record that must be disclosed (per hour or part of an hour reasonably required for the search, excluding the first hour)	R100.00
To not exceed a total cost of	R500.00
Where a copy of a record needs to be posted the actual postal fee is payable.	TBC