



AXIM GROUP

GROUP PROMOTION OF ACCESS TO INFORMATION MANUAL

Prepared in terms of Section 51 of The Promotion of Access to Information Act 2 of 2000 (PAIA), as amended.

GROUP ENTITIES COVERED BY THIS MANUAL

This Group Manual applies to the following private bodies within the AXIM Group:

1. AXIM (Pty) Ltd – Registration No: 2017/097295/07
2. AXIM Nuclear and Oncology (Pty) Ltd – Registration No: 2019/508849/07
3. Africa X-Ray Industrial and Medical (Pty) Ltd – Registration No: 1967/010287/07
4. Marcus Medical (Pty) Ltd – Registration No: 1965/002407/07



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1. INTRODUCTION

1.1 This Manual is prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA).

The access to information manual is prepared in compliance with the Promotion of Access to Information Act, (Act 2 of 2000) and the Protection of Information Act, (Act 4 of 2013) (“POPIA”). In terms of this legislation, everyone has the right to access their personal information that is processed by a private body, responsible party or appointed operator, such as a company in the AXIM Group. The purpose of this manual is to enable requesters to get access to the records to which they are entitled.

1.2 This Manual is aligned with the Protection of Personal Information Act 4 of 2013 (POPIA).

1.3 This is a consolidated Group Manual applicable to all listed entities, each of which remains a separate responsible party in terms of POPIA.

2. LEGISLATIVE FRAMEWORK

2.1 Constitution of the Republic of South Africa, 1996 – Section 32.

2.2 Promotion of Access to Information Act 2 of 2000 (PAIA).

2.3 Protection of Personal Information Act 4 of 2013 (POPIA).

2.4 PAIA Regulations, 2021.

2.5 POPIA Regulations, 2018.

2.6 <https://inforegulator.org.za/acts/>



3. GROUP GOVERNANCE AND INFORMATION OFFICER

3.1 The Group Information Officer is George Theron.

3.2 Email: georget@axim.co.za

3.3 Telephone: +27 11 314 0140

3.4 The Information Officer is responsible for oversight of PAIA and POPIA compliance across all entities.

3.5 Deputy Information Officer is Mark Jooste.

3.6 Email: markj@axim.co.za

3.7 Telephone: +27 11 314 0140

3.8 Access to information general contacts:

Email: info@axim.co.za

4. PARTICULARS OF EACH ENTITY

4.1 AXIM (Pty) Ltd – Registered Office: 63 Old Pretoria Road, Halfway House Ext 2, Midrand, 1685.

4.2 AXIM Nuclear and Oncology (Pty) Ltd – Registered Office: 63 Old Pretoria Road, Halfway House Ext 2, Midrand, 1685.

4.3 Africa X-Ray Industrial and Medical (Pty) Ltd – Registered Office: 63 Old Pretoria Road, Halfway House Ext 2, Midrand, 1685.

4.4 Marcus Medical (Pty) Ltd – Registered Office: 63 Old Pretoria Road, Halfway House Ext 2, Midrand, 1685.

5. GUIDE BY THE INFORMATION REGULATOR (PAIA SECTION 10)

5.1 The official PAIA Guide is available from the Information Regulator website.

<https://inforegulator.org.za/paia-guidelines/>

6. RECORDS AUTOMATICALLY AVAILABLE (SECTION 52 PAIA)

6.1 Company profiles and marketing materials.

6.2 B-BBEE certificates (where applicable).

6.3 Published policies.

6.4 This Manual.

7. CATEGORIES OF RECORDS HELD (SECTION 51(1)(e) PAIA)

The following categories of information are available for inspection in terms of PAIA. The procedure in terms of which such records may be requested from the Company is set out in this manual. The records listed below will not in all instances be provided to a requester who requests them in terms of PAIA as the requester is required to identify the right the requester is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise of protection of that right.

7.1 Corporate governance records.

7.2 Financial and taxation records.

7.3 Human resources and payroll records.

7.4 Operational and commercial agreements.

7.5 Regulatory and compliance records.

7.6 Electronic records including emails, ERP systems, CRM systems and CCTV footage.



8. PROCESSING OF PERSONAL INFORMATION (POPIA SECTIONS 8–25)

8.1 Each entity processes personal information in accordance with the eight conditions for lawful processing.

8.2 Processing is limited to lawful, specific and defined purposes.

8.3 Personal information is retained only for as long as necessary and lawfully required.

8.4 Below is a list of data subjects and a non-exhaustive list of personal information that may be processed.

Categories of Data Subjects	Personal Information that may be processed
Employee	Name, personal contact information date of birth, email address, user id, job title, employment history, educational history, gender, nationality, salary and benefit details, images, date of employment, performance reviews, details of internal and external training undertaken, travel and expenses data, disciplinary records, grievances, record of app and website visits, IP address, cookie data, preferences, financial data, user account details, CCTV footage, clock-in details, annual and sick leave history
Juristic entities, including service providers, vendors, suppliers	Name, Company/Entity Registration number, income tax and VAT registration numbers, BEE certificates, address, agreements, any other related data.
Prospective employees	Name, personal contact information, date of birth, email address, job title, employment history, educational history, gender, nationality, salary and benefits, images.

9. DATA SUBJECT RIGHTS (POPIA CHAPTER 3)

9.1 Right of access to personal information.

9.2 Right to correction or deletion.

9.3 Right to object to processing.

9.4 Right to withdraw consent.

9.5 Right to lodge a complaint with the Information Regulator.

10. REQUEST PROCEDURE (PAIA SECTIONS 53–60)

10.1 Requests must be submitted on prescribed Form 2. A copy of the manual form (Form2) can be downloaded from the Information Regulator's website:

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRgSA-PAIA-Form02-Reg7.pdf>

10.2 The Group Information Officer will coordinate responses.

10.3 Response within 30 days (extendable where permitted).

10.4 The access request must contain sufficient details to enable the Information Officer to identify the following:

- The record requested.
- The proof of identity of the requester.
- Identify the right the requester is seeking to exercise or protect, and provide an explanation why the requested record is required for the exercise or protection of that right.
- 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, to submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Information Officer.



11. GROUNDS FOR REFUSAL (PAIA CHAPTER 4)

11.1 Protection of third-party privacy.

11.2 Protection of commercial and confidential information.

11.3 Legal privilege.

11.4 Safety and security considerations.

11.5 Protection of confidential information of third parties if it is protected in terms of any agreement or legislation.

12. FEES (PAIA REGULATIONS, 2021)

12.1 Prescribed request and access fees apply in accordance with the Regulations.

13. SECURITY SAFEGUARDS (POPIA SECTION 19)

13.1 Appropriate technical and organisational safeguards are implemented across the Group.

13.2 Operators and Responsible Parties are contractually bound to protect personal information.

14. CROSS-BORDER TRANSFERS (POPIA SECTION 72)

14.1 Cross-border transfers occur only where requested by the data subject, and adequate protection or consent exists.

15. SECURITY COMPROMISES (POPIA SECTION 22)

15.1 The Information Regulator and affected data subjects will be notified where required.

16. RECORD RETENTION AND DESTRUCTION

16.1 Records are retained in accordance with applicable legislation.

16.2 Secure destruction procedures are implemented across all entities.

17. AVAILABILITY OF THIS MANUAL

17.1 This manual is available in English only.

17.2 This Manual is available at the AXIM Group Head office:
63 Old Pretoria Road
Halfway House Ext2
Midrand
Gauteng
1685

17.3 A copy of the manual is available on the company websites:
www.axim.co.za
www.marcusmed.co.za

UPDATING OF THE MANUAL

The Information Officer of the AXIM Group will update this manual on a regular basis.

Issued by

**George Theron
Information Officer**