



INFORMATION MANUAL

**PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT 2 OF 2000 (“PAIA”) AND SECTION 18 OF THE PROTECTION
OF PERSONAL INFORMATION ACT 4 OF 2013 (“POPIA”)**

COMPILED FOR:

LoRuMir D (Pty) Ltd.

with Registration Number 2005/001571/07
(hereinafter referred to as “the Private Body”)

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1. INTRODUCTION

- 1.1. This Information Manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (“PAIA”), as amended, and section 18 of the Protection of Personal Information Act 4 of 2013 (“POPIA”).
- 1.2. PAIA gives effect to section 32 of the Constitution of the Republic of South Africa, 1996, which provides for the right of access to information held by the State and to information held by another person where such information is required for the exercise and/or protection of any rights.
- 1.3. POPIA gives effect to section 14 of the Constitution of the Republic of South Africa, 1996, which provides for the right to privacy.
- 1.4. This Manual is intended to:
 - 1.4.1. facilitate requests for access to records held by the Private Body;
 - 1.4.2. provide details regarding the categories of records held by the Private Body;
 - 1.4.3. provide information regarding the processing of personal information by the Private Body;
 - 1.4.4. describe the categories of data subjects and personal information processed by the Private Body;
 - 1.4.5. describe the purpose for which personal information is processed;
 - 1.4.6. describe the recipients to whom personal information may be supplied;
 - 1.4.7. describe planned trans-border flows of personal information; and
 - 1.4.8. describe the security measures implemented by the Private Body to protect personal information.
- 1.5. This Manual does not create any contractual rights and shall be interpreted in accordance with PAIA and POPIA.

2. DEFINITIONS AND INTERPRETATION

- 2.1. In this Manual, unless the context indicates otherwise:
 - 2.1.1. words importing any gender include the other genders;
 - 2.1.2. words importing the singular include the plural and vice versa;
 - 2.1.3. words importing natural persons include juristic persons and vice versa.
- 2.2. In this Manual:
 - 2.2.1. **“data subject”** means the person to whom personal information relates;
 - 2.2.2. **“Information Officer”** means the Information Officer designated by the Private Body in terms of PAIA and POPIA;
 - 2.2.3. **“personal information”** means information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person;
 - 2.2.4. **“POPIA”** means the Protection of Personal Information Act 4 of 2013;
 - 2.2.5. **“Private Body”** means **LoRuMir D (Pty) Ltd**;
 - 2.2.6. **“requester”** means any person requesting access to a record held by the Private Body.
- 2.3. Any reference to legislation shall include any amendment or substitution of such legislation.
- 2.4. In the event of a conflict between this Manual and PAIA or POPIA, the provisions of PAIA or POPIA shall prevail.

3. CONTACT DETAILS OF THE PRIVATE BODY

3.1. INFORMATION OFFICER

Name: Karla Laubscher

Designation: Operations Manager

Telephone Number: +27 72 708 4556

Email Address: operations@lorumird.co.za

3.2. DEPUTY INFORMATION OFFICER

Name: Lorinda Sinclair

Designation: Chief Executive Officer

Telephone Number: +27 83 326 4963

Email Address: lorindasinclair@lorumird.co.za

3.3. GENERAL CONTACT DETAILS

Postal Address: 16 Bruce Road, Irene, Centurion, 0157

Physical Address: 16 Bruce Road, Irene, Centurion, 0157

Telephone Number: +27 83 326 4963

General Email Address: info@lorumird.co.za

Website Address: <https://www.lorumird.co.za/>

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

1. The Information Regulator has, in terms of section 10 of PAIA, compiled and published a guide on how to exercise rights contemplated in PAIA and POPIA.
2. The guide contains information relating to:
 - 2.1. the objects of PAIA and POPIA;
 - 2.2. the manner and form of requests for access to records;
 - 2.3. assistance available from the Information Regulator;
 - 2.4. remedies available in law in the event of refusal of access; and
 - 2.5. the rights of data subjects under POPIA.
3. The guide is available from the Information Regulator as follows:

Website: <https://inforegulator.org.za>

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Telephone Number: +27 10 023 5200

Email Address: enquiries@inforegulator.org.za

5. CATEGORIES OF RECORDS OF THE PRIVATE BODY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

5.1. The following records may be available without a formal request in terms of PAIA:

Category of Records	Types of Records	Available on Website	Available Upon
Corporate Information	Company profile, services and contact	Yes	Yes
Legal and Compliance	PAIA Manual, POPIA notices and policies	Yes	Yes
Marketing Material	Brochures and promotional material	Yes	Yes
Product Information	Product specifications, user information, manufacturer information and product catalogues intended for	Yes	Yes
News and Publications	Company news, announcements and newsletters (where applicable)	Yes (if published)	Yes
Employment opportunities	Available vacancies and career information (where applicable)	No	Yes

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

6.1. Records are held in accordance with, inter alia, the following legislation:

Category of Records	Applicable Legislation
Corporate Records	Companies Act 71 of 2008
Corporate Records	Close Corporations Act 69 of 1984
Consumer Records	Consumer Protection Act 68 of 2008
Taxation Records	Income Tax Act 58 of 1962
Taxation Records	Tax Administration Act 28 of 2011
VAT Records	Value Added Tax Act 89 of 1991
Employment Records	Labour Relations Act 66 of 1995
Employment Records	Basic Conditions of Employment Act 75 of 1997
Employment Records	Employment Equity Act 55 of 1998
Employment Records	Compensation for Occupational Injuries and Disease Act 130 of 1993
Employment Records	Unemployment Insurance Act 63 of 2001
Employment Records	Unemployment Insurance Contributions Act 4 of 2002
Compliance Records	Financial Intelligence Centre Act 38 of 2001
Technology Records	Electronic Communications and Transactions Act 25 of 2002
Technology Records	Cybercrimes Act 19 of 2020
Information Records	Promotion of Access to Information Act 2 of 2000
Personal Information Records	Protection of Personal Information Act 4 of 2013
Occupational Health and Safety	Occupational Health and Safety Act 85 of 1993
Medical Device Compliance Records	Medicines and Related Substances Act 101 of 1965
Medical Device Compliance Records	Hazardous Substances Act 15 of 1973
Import and Customs Records	Customs and Excise Act 91 of 1964
B-BBEE RECORDS	Broad-Based Black Economic Empowerment Act 53 of 2003
Skills Development Records	Skills Development Act 97 of 1998
Skills Development Records	Skills Development Levies Act 9 of 1999

**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE PRIVATE BODY HOLDS
RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT**

7.1. INTERNAL ADMINISTRATION, COMPLIANCE AND MANAGEMENT

Categories of Records
Records relating to incorporation and registration
Board resolutions and minutes
Governance and compliance records
Regulatory reports
Internal audit records
Risk management records
Internal policies and procedures
Agreements and contracts
Shareholder resolutions
Statutory registers
CIPC records
SAHPRA licenses, permits and registrations
ISO 13485 certification records
Quality management system (QMS) records

7.2. HUMAN RESOURCES

Categories of Records
Employee records
Employment contracts
Payroll records
Leave records
Performance appraisals
Disciplinary records
Pension and provident fund records (N/A)
Employment Equity records (N/A)
Health and safety records
Training records
Occupational health and safety incident records
Recruitment records

7.3. FINANCIAL RECORDS

Categories of Records
Annual financial statements
Accounting records
Tax records
Banking records
Debtors and creditors records
Import and customs records
SARS records
VAT records
Inventory valuation records

7.4. CLIENT RECORDS

Categories of Records
Customer agreements
Customer account records
Orders and purchase records
Quotations
Invoices
Delivery notes
Product warranty records
Product support and service records
Customer correspondence
Customer complaints
Customer personal information

7.5. SUPPLIER AND THIRD-PARTY RECORDS

Categories of Records
Supplier agreements
Service level agreements
Vendor records
Third-party due diligence records
Distribution agreements
Manufacturer agreements
Import documentation
Procurement records
Supplier compliance records
Supplier invoices

7.6. INFORMATION TECHNOLOGY RECORDS

Categories of Records
IT policies
System records
Network security records
Software licensing records
Cyber security records
Website records
Email records
Data backup records
Access control records

7.7. ASSET RECORDS

Categories of Records
Asset registers
Insurance records relating to assets
Fixed asset register
Medical device inventory records
Warehouse inventory records
Vehicle records (if applicable)
Maintenance records

7.8. QUALITY ASSURANCE AND REGULATORY RECORDS

Categories of Records
Product registration records
SAHPRA compliance records
Quality Management System (ISO 13485) records
Product traceability records
Product recalls and corrective action records
Supplier quality records
Product technical documentation
Product complaints and adverse event records
Regulatory inspection records

8. REQUEST PROCEDURE AND FORM OF REQUEST

- 8.1. Any person requesting access to a record held by the Private Body must submit a request in writing.
- 8.2. Requests must be submitted:
 - 8.2.1. by email to the Information Officer;
 - 8.2.2. electronically through any available platform provided by the Private Body;
or
 - 8.2.3. by physical delivery to the registered address of the Private Body.
- 8.3. Requests must be submitted using:
 - 8.3.1. Form 2 prescribed by the Information Regulator; or
 - 8.3.2. a substantially similar form containing all required information.
- 8.4. The request must contain:
 - 8.4.1. sufficient details to identify the record requested;
 - 8.4.2. proof of identity of the requester; and
 - 8.4.3. proof of authority where the request is made on behalf of another person.
- 8.5. The Private Body shall:
 - 8.5.1. acknowledge receipt of the request;
 - 8.5.2. determine whether the request complies with the requirements of PAIA;
 - 8.5.3. process the request in accordance with PAIA;
 - 8.5.4. notify the requester of any applicable access fee; and
 - 8.5.5. notify the requester of the outcome within 30 (thirty) days, subject to lawful extension.
- 8.6. Where access is refused, the requester shall be informed of:
 - 8.6.1. the reasons for refusal;
 - 8.6.2. the right to lodge a complaint with the Information Regulator; and
 - 8.6.3. the right to apply to a court of competent jurisdiction.

9. FEES PRESCRIBED IN TERMS OF THE REGULATIONS

- 9.1. Fees payable for requests for access to records are prescribed by regulations issued under PAIA.
- 9.2. The applicable fees may include:
 1. a request fee;
 2. an access fee;
 3. reproduction costs; and
 4. a deposit where the search and preparation time exceeds the prescribed threshold.
- 9.3. The requester shall be notified of:
 - 9.3.1. the applicable fees;
 - 9.3.2. the manner of payment; and
 - 9.3.3. any deposit payable before processing.
- 9.4. Records may be withheld until all prescribed fees have been paid.
- 9.5. The latest prescribed fee structure is available from the Information Regulator at:
<https://inforegulator.org.za>

10. PROCESSING OF PERSONAL INFORMATION

- 10.1. The Private Body processes personal information relating to employees, clients, suppliers and other data subjects.
- 10.2. Personal information is processed in accordance with POPIA.
- 10.3. Data subjects have the right to:
 - 10.3.1. request confirmation regarding whether the Private Body holds personal information about them;
 - 10.3.2. request access to their personal information;
 - 10.3.3. request correction or deletion of personal information;
 - 10.3.4. object to the processing of personal information; and
 - 10.3.5. lodge a complaint with the Information Regulator.
- 10.4. The Private Body shall not process special personal information unless:
 - 10.4.1. the data subject has consented thereto;
 - 10.4.2. processing is necessary for the establishment, exercise or defence of a right or obligation in law; or
 - 10.4.3. processing is permitted in terms of POPIA.
- 10.5. Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, the Private Body shall notify the Information Regulator and affected data subjects where required by law.
- 10.6. Personal information shall not be retained longer than necessary unless required by law.

11. PURPOSE OF PROCESSING PERSONAL INFORMATION

11.1. The purposes for which personal information may be processed include:

- 11.1.1. compliance with legal and regulatory obligations;
- 11.1.2. employment administration;
- 11.1.3. client relationship management;
- 11.1.4. rendering services to clients;
- 11.1.5. supplier and vendor management;
- 11.1.6. financial and accounting administration;
- 11.1.7. risk management;
- 11.1.8. fraud prevention;
- 11.1.9. direct marketing, where permitted by law; and
- 11.1.10. information technology and systems administration.
- 11.1.11. processing quotations, orders, deliveries and returns;
- 11.1.12. supplying, distributing and supporting medical devices and related products;
- 11.1.13. administering warranties, repairs, servicing and technical support;
- 11.1.14. product quality assurance, product traceability, product recalls, adverse event reporting and complaint management;
- 11.1.15. compliance with the requirements of the South African Health Products Regulatory Authority (SAHPRA) and other applicable regulatory authorities;
- 11.1.16. managing website enquiries, online purchases and customer communications;
- 11.1.17. contact administration and the management of commercial relationships with customers, suppliers and business partners.

12. DESCRIPTION OF DATA SUBJECTS AND INFORMATION PROCESSED

Categories of Data Subjects	Personal Information that may be Processed
Employees	Identity numbers, contact details, qualifications, employment records, payroll information, race and gender information, emergency contact details, banking details, training records, disciplinary and performance records and medical aid and pension/provident fund information
Customers	Names, addresses, registration numbers, financial information, transactional records, delivery addresses, contact persons, purchase history, correspondence, warranty information and product
Suppliers and Service Providers	Contact details, banking details, registration details and contractual information, contact persons, tax/VAT information, correspondence, performance and compliance records
Website Users	IP addresses, online identifiers and website usage information, names and contact details submitted through website enquiry forms
Business partners, Distributors and Manufacturers	Contact details, company information, contractual information, correspondence and authorised representative details

13. RECIPIENTS OF PERSONAL INFORMATION

Category of Personal Information	Recipients or Categories of Recipients
Payroll Information	Payroll administrators and banks
Employee Information	SARS, Department of Labour and retirement fund administrators
Identification Information	Verification agencies and regulatory authorities
Customer Information	Logistics providers, couriers, authorised distributors, service providers and business partners, where necessary for the fulfilment of
Supplier Information	Professional advisors, financial institutions and regulatory authorities, where required
Financial Information	Auditors, accountants, banks, and regulatory
Regulatory Compliance Information	South African Health Products Regulatory Authority (SAHPRA) and other competent regulatory authorities, where required by law
Information Technology Information	Cloud service providers, IT support providers and software vendors
Website User Information	Website hosting providers, analytics providers and authorised IT service providers

14. TRANS-BORDER FLOWS OF PERSONAL INFORMATION

- 14.1. The Private Body may transfer personal information outside the Republic of South Africa for purposes of:
- 14.1.1. cloud storage;
 - 14.1.2. information technology support services;
 - 14.1.3. international business operations;
 - 14.1.4. service delivery;
 - 14.1.5. the procurement, importation and distribution of medical devices and related products;
 - 14.1.6. communications with international manufacturers, suppliers, distributors and business partners;
 - 14.1.7. the administration and performance of cross-border commercial agreements;
 - 14.1.8. regulatory compliance and communications with foreign regulatory authorities, where applicable; and
 - 14.1.9. the provision of software, cloud-based platforms and other technology services hosted outside the Republic of South Africa.
- 14.2. Where personal information is transferred internationally; the Private Body shall ensure that adequate safeguards are implemented in accordance with section 72 of POPIA.
- 14.3. Where personal information is transferred to a third party outside the Republic of South Africa, the Private Body shall ensure that appropriate contractual, organisational and technical safeguards are implemented to protect such personal information in accordance with section 72 of the Protection of Personal Information Act 4 of 2013 and the Private Body's applicable cross-border data protection policies.
- 14.4. The Private Body has implemented internal policies and contractual undertakings governing the international transfer, processing and retention of personal information to ensure compliance with applicable data protection laws and industry best practice.

15. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

15.1. The Private Body implements appropriate technical and organisational security measures to protect personal information.

15.2. Physical security measures include:

- 15.2.1. access control to premises;
- 15.2.2. security gates and visitor control;
- 15.2.3. CCTV monitoring;
- 15.2.4. secure storage of physical records; and
- 15.2.5. shredding of confidential documents.

15.3. Cyber security measures include:

- 15.3.1. firewalls;
- 15.3.2. anti-virus and anti-malware protection;
- 15.3.3. password protection;
- 15.3.4. automatic system locking;
- 15.3.5. data backups;
- 15.3.6. restricted system access; and
- 15.3.7. cyber security monitoring.

16. AVAILABILITY OF THE MANUAL

16.1. A copy of this Manual is available:

- 16.1.1. on the website of the Private Body at: <https://www.lorumird.co.za/>
- 16.1.2. at the registered offices of the Private Body for public inspection during normal business hours;
- 16.1.3. from the Information Officer upon request and payment of the prescribed fee; and
- 16.1.4. from the Information Regulator.

17. UPDATING OF THE MANUAL

17.1. This Manual shall be reviewed and updated periodically or as required by legislative or operational changes.

SIGNED at _____ on this _____ day of _____ 2026.

Karla Laubscher

Information Officer

Duly authorised thereto