



PAIA Manual of DR Z ALEKSIC INC

t/a The Eye Surgery

Registration number: 2026/381172/21

in terms of

Section 51 of the Promotion of Access to Information Act (Act 2 of 2000)

read with

Section 17 of the Protection of Personal Information Act (Act 4 of 2013)

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CONTENTS

1. INTRODUCTION TO THE PRACTICE
2. CONTACT DETAILS
3. GUIDE OF THE INFORMATION REGULATOR
4. RECORDS
5. RECORDS AUTOMATICALLY AVAILABLE
6. PURPOSE OF PROCESSING PERSONAL INFORMATION
7. DATA SUBJECTS, THEIR PERSONAL INFORMATION AND POTENTIAL RECIPIENTS OF THIS INFORMATION
8. OPERATORS, SOFTWARE AND ARTIFICIAL INTELLIGENCE (AI)
9. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION
10. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION
11. PROCEDURE TO OBTAIN ACCESS TO RECORDS OR INFORMATION
12. FEES PAYABLE TO OBTAIN THE REQUESTED RECORDS OR INFORMATION
13. AVAILABILITY OF THIS MANUAL
14. ANNEXURE A: INFORMATION AND RECORD REQUEST FORM
15. ANNEXURE B: FEES

1. INTRODUCTION TO THE PRACTICE

Dr Z Aleksic Inc, trading as The Eye Surgery ("the practice"), is a personal liability company which is conducted in accordance with the requirements of the Health Professions Act 56 of 1974 and is subject to the authority of the Health Professions Council of South Africa ("HPCSA"). The practice consults from Sea Point, Cape Town and from its Vredenburg branch. The practitioners practising at the practice are registered with the HPCSA and provide medical services within the scope and ambit of their registration, competence and training. The practitioners are bound by the Ethical Rules issued by the HPCSA, which include the duty to preserve patient confidentiality.

2. CONTACT DETAILS

Item	Details
Practice name	Dr Z Aleksic Inc t/a The Eye Surgery
Registration number	2026/381172/21
Practice number	2604426
Head of the practice	Dr Zoran Aleksic
Information Officer	Dr Zoran Aleksic
Physical address	Suite 701, 7th Floor, The Point Mall, 76 Regent Road, Sea Point, Cape Town 8005 Branch: Room 11, Life West Coast Hospital, 22 Voortrekker Road, Vredenburg 7380
Postal address	Suite 701, 7th Floor, The Point Mall, 76 Regent Road, Sea Point, Cape Town 8005
Telephone number	021 426 4842
E-mail address	info@eyesurgery.co.za
Website address	www.eyesurgery.co.za

3. GUIDE OF THE INFORMATION REGULATOR

The Information Regulator has compiled a Guide, in terms of Section 10 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), to assist persons wishing to exercise their rights in terms of PAIA and the Protection of Personal Information Act 4 of 2013 ("POPIA"). The Guide is available in the official languages and contains, amongst others, the following information:

- the purpose of PAIA and POPIA;
- the manner, form and costs of a request for access to information held by a body;
- legal remedies when access to information is denied;
- when access to information may be denied; and
- the contact details of Information Officers in the national, provincial and local government.

Any person wishing to obtain the Guide may access it on the website of the Information Regulator at www.inforegulator.org.za, request a copy from the practice's Information Officer, or contact the Information Regulator at:

Information Regulator	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg 2191

Information Regulator	Details
Telephone number	010 023 5200 Toll-free: 0800 017 160
General enquiries	enquiries@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za
POPIA complaints	POPIAComplaints@infoeregulator.org.za
Website	www.infoeregulator.org.za

4. RECORDS

The practice holds the following categories of records:

Records relating to the form of practice and related matters:

Documents related to the establishment of the practice, such as documents required in terms of the Companies Act 71 of 2008; governance documents (e.g. practice policies, including the practice's privacy, information security and AI use policies); minutes of meetings; practice code number registration-related documents and other related documents.

Records relating to the registration of practitioners working at the practice:

Proof of registration with the HPCSA and related documents.

Employment records:

Employment contracts; conditions of employment and workplace policies; signed confidentiality, privacy (POPIA) and AI use undertakings and contract addenda; system user-account and access records; employment equity and skills development plans and reports; attendance register and time-keeping records; salary and wage register; performance management records; collective agreements; documents related to disciplinary proceedings, arbitration awards as well as legal cases and cases at the Commission for Conciliation, Mediation and Arbitration ("CCMA"); expense accounts; relevant tax information and related records; medical scheme and pension fund membership records; records relevant to contracted staff; training records; and information related to the membership of professional societies.

Patient records:

Records are kept in respect of all patient engagements, which include health information and other relevant personal information. Patient records are kept electronically in the practice's practice management and electronic health record system and its diagnostic imaging software, and include registration and medical aid details, consultation notes, reports, letters, special investigation images and results (e.g. fundus photographs, scans and visual fields), consent forms, quotations and accounts. Draft clinical notes and transcripts prepared with the assistance of the practice's AI clinical scribe are held temporarily until the reviewed, final note is saved to the patient's record.

Patient management records:

Protocols, guidelines, clinical note templates and related documentation in respect of the management of patients.

Clinical trial records:

Records related to participation in clinical trials.

Financial records:

Annual Financial Statements; auditor's reports; accounting records; bank statements; invoices, statements, receipts and related documents; VAT records; payments to the South African Revenue

Service ("SARS"), other government bodies, staff and suppliers; and tax returns and related documentation.

Records related to assets:

Asset register; purchase records; financing and lease agreements; sale and purchase agreements; title deeds; mortgage bond documentation; registers and records kept in terms of the Medicines and Related Substances Act 101 of 1965; stock sheets; delivery notes and orders; and software licences and subscriptions.

Agreements:

Agreements (and related documentation) with contractors, consultants, suppliers and vendors, including operator agreements, data processing agreements and terms of service with software, cloud and AI service providers, agreements with funders and agreements related to clinical trials.

Records relating to legal processes:

Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation; settlement agreements; and legal opinions/advice.

Insurance records:

Insurance policies and related records, including in respect of professional indemnity cover; and claims records.

5. RECORDS AUTOMATICALLY AVAILABLE

No notice has been submitted by the practice to the Minister of Justice and Correctional Services regarding the categories of records which are available without a person having to request access in terms of Section 52(2) of PAIA. However, the information on the website of the practice, including this Manual and the practice's POPIA Notice, is automatically available without having to request access in terms of PAIA. Access to and usage of the information on the website are subject to the Website Terms and Conditions as well as the Privacy Policy of the practice.

6. PURPOSE OF PROCESSING PERSONAL INFORMATION

The practice processes personal information of data subjects for the following purposes:

- to conduct and manage the practice in accordance with the law, including the administration of the practice and claiming and collecting payment for services rendered from relevant funders such as medical aids, patients and/or responsible persons / entities;
- for treatment and care of patients, including referrals to other practitioners and reporting to referring practitioners;
- for the preparation of clinical notes, reports, letters and patient summaries, including with the assistance of the practice's approved AI clinical scribe, subject to review by the treating practitioner;
- for communication purposes;
- for the maintenance of practice records and patients' medical records;
- for employment and related matters of employees and other practitioners;
- for reporting to persons and bodies as required and authorised in terms of the law or by the data subjects;
- for historical, statistical and research purposes;

- for clinical trials;
- for proof;
- for enforcement of the practice's rights; and/or
- for any other lawful purpose related to the activities of a private practice.

7. DATA SUBJECTS, THEIR PERSONAL INFORMATION AND POTENTIAL RECIPIENTS OF THIS INFORMATION

The practice holds the categories of records and personal information in respect of the categories of data subjects specified below. The potential recipients of the personal information processed by the practice are also specified. Information and records are only disclosed as may be necessary in the circumstances and as authorised in terms of the law, or otherwise with the consent of the relevant data subjects.

DATA SUBJECTS	CATEGORIES OF RECORDS	CATEGORIES OF PERSONAL INFORMATION	POTENTIAL RECIPIENTS OF THE PERSONAL INFORMATION
Directors, shareholders and employees	Statutory records; shareholders' agreement; employment / appointment records; signed confidentiality, privacy and AI use undertakings and addenda; statutory council registration records; salary and payment records; disciplinary conduct and related records; employment equity and skills development records; employment policies; leave and attendance records; tax records; medical certificates; Continuing Professional Development ("CPD") and training records; system user-account records; correspondence	Names and surnames; contact details e.g. address, telephone and e-mail addresses; identity numbers / dates of birth; race; gender; nationality; qualifications; statutory council registration numbers; registered profession; category of registration; employment history and information; position held and job description; banking details; relevant medical history; criminal behaviour; disciplinary conduct-related information; correspondence; records created in the performance of their duties; tax numbers and related tax information; leave records; remuneration; employment benefits; absenteeism information; next-of-kin details; system usernames and access logs	SARS; relevant statutory and other public bodies; Board of Healthcare Funders of SA ("BHF"); Companies and Intellectual Property Commission ("CIPC"); funders; contractors and suppliers (including payroll, time-keeping, bookkeeping and software providers); patients; bodies performing peer review; banks; professional societies; vetting agencies; hospitals; members of the public; auditors; executors of estates; purchaser of practice
Patients	Patient records, including medical records, consultation notes, reports, special investigation images, AI-assisted draft notes, financial arrangements, invoices, payment records and correspondence	Names and surnames; contact details e.g. addresses, telephone numbers, e-mail addresses; identity numbers / dates of birth; race; gender; nationality; employers and their contact details; medical scheme-related information; names, surnames and contact details of next-of-kin; medical history, including details about injuries sustained; billing and payment-related information; procedures performed; diagnosis and procedure codes; special investigation images and reports (e.g. fundus photographs, scans, visual fields, laboratory results); referral notes; consultation content (transcribed temporarily, where the AI scribe is used); complaints and compliments; correspondence; patient forms	Funders; employers; debt collectors; treating practitioners; credit bureaus; bodies performing peer review; relevant statutory and public bodies; hospitals; next-of-kin; executors of estates; purchaser of practice; anaesthetists and other practitioners involved in care; suppliers of lenses, implants and medication (name and order details only); clinical outcome registries (with consent only); operators acting on the practice's behalf (e.g. practice management, imaging, AI scribe, e-mail and cloud storage providers)
Practitioners referring patients to the practice	Referral notes; correspondence	Names and surnames; contact details e.g. addresses, telephone numbers, e-mail addresses and practice code numbers of practitioners	Funders; relevant statutory and public bodies; hospitals; bodies performing peer review; purchaser of practice

DATA SUBJECTS	CATEGORIES OF RECORDS	CATEGORIES OF PERSONAL INFORMATION	POTENTIAL RECIPIENTS OF THE PERSONAL INFORMATION
Medical schemes and other funders	Claims; remittance advices; contracts; correspondence; rules; policy provisions	Relevant staff / office bearer details; contact details e.g. address, telephone numbers, e-mail addresses; correspondence	Patients; debt collectors; purchaser of practice
Hospitals	Correspondence	Names; contact details e.g. address, telephone numbers, e-mail address and practice code number	Patients; funders; purchaser of practice
Other contractors, vendors and suppliers (including software, IT and AI service providers)	Agreements with contractors, vendors and suppliers; operator / data processing agreements; non-disclosure agreements; debt collection agreements; legal opinions and advice; invoices; correspondence	Names and surnames; organisation names and details; relevant staff / office bearer details; contact details e.g. addresses, telephone numbers, e-mail addresses, website addresses; opinions; correspondence; track records; price structures; financial arrangements	Banks; auditors; accountants; legal advisers; funders; purchaser of practice
Insurers	Insurance policies; payment of premiums; claims records and related documents	Names and contact details e.g. addresses, telephone numbers, e-mail addresses; premiums; correspondence	Auditor; legal advisers; relevant public bodies; purchaser of practice
Public and statutory bodies (e.g. HPCSA)	Complaints submitted to the relevant statutory bodies and related documents; correspondence; newsletters and circulars issued by these bodies; statutory information, including legislation; payment records	Names; contact details e.g. addresses, telephone numbers, e-mail addresses; office bearers; fee structures; correspondence	Funders; patients; purchaser of practice

8. OPERATORS, SOFTWARE AND ARTIFICIAL INTELLIGENCE (AI)

The practice uses the categories of software and service providers listed below. For information-security reasons this Manual describes them by category; the practice keeps an internal register of the specific providers, which is available to the Information Regulator on request. Service providers that process personal information on the practice's behalf act as operators in terms of Section 21 of POPIA and are required, by written agreement or binding terms, to process information only for the practice's purposes, to keep it confidential and to secure it. Employees may only use approved tools, through practice-controlled accounts.

Category	Purpose	Personal information and safeguards
Practice management and electronic health record system	Appointments, registration, billing and medical aid claims, clinical notes, reports, letters, electronic consents, and SMS, e-mail and telephony (VoIP) communication with patients.	Holds the official patient record. Individual, password-protected user accounts with access limited to what each role requires.
Diagnostic, imaging and visual field testing software	Capturing, storing and viewing results and images from ophthalmic diagnostic equipment (including DICOM images).	Patient identifiers and clinical results. Access limited to the clinical team.
AI clinical scribe	Listens to consultations (with the patient's knowledge) and prepares draft clinical notes, letters, medical certificates and plain-language patient summaries.	Audio recordings are not stored; data is not used to train AI models or for any secondary purpose; data is stored on servers in the European Union. Individual staff accounts. The treating practitioner reviews and approves every note before it is saved to the patient record; drafts are not kept longer than necessary. Patients may decline its use.
AI writing assistant	Drafting and editing general e-mails, letters, templates, policies and other practice documents, using a practice business account.	No patient personal information or health information may be entered, including names, contact details, ID numbers, medical aid details, diagnoses or images. All drafts are reviewed by staff before use.
Translation tools	Interpretation where the patient and practitioner do not share a language.	Used only with the patient's agreement. No identifying details are typed into translation tools.
Clinical calculators	Intra-ocular lens (IOL) power calculations from biometry measurements.	Measurements only; patient names are not entered where the calculator allows this.
E-mail, cloud storage, backup, office software and practice devices	Practice e-mail, document storage, backups and day-to-day administration on practice-managed devices.	Practice-controlled accounts and devices, password and device-level security.
Internal staff messaging	Communication and coordination between staff members.	Practice workspace only. Patient details limited to what is essential (e.g. file number or initials); no clinical records or images shared.
Website, online forms and messaging	Contact and online patient intake forms; messages with patients on the practice's WhatsApp number, managed through a WhatsApp business messaging platform.	Submissions are transferred into the patient record; patients are asked not to send sensitive medical information by message unless requested.
Staff time-keeping and practice bookkeeping	Employee working hours and leave; capture of practice expense invoices and receipts for the practice's accountants.	Employee and supplier information only; no patient clinical information.

AI tools are used to assist with documentation only. They do not make decisions about a patient's diagnosis, treatment or care, and no decision with legal or similar effect is taken about any data subject based solely on automated processing (Section 71 of POPIA).

In addition, patient personal information may be shared, only to the extent necessary, with: hospitals and day clinics (bookings and theatre lists); anaesthetists and other practitioners involved in the patient's care; suppliers of intra-ocular lenses, implants, contact lenses and medication (patient name and order details only, to supply and assign the correct item); medical schemes (including copies of invoices and statements at the patient's request); and clinical outcome registries, only with the patient's specific consent.

9. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

The practice stores electronic information, including personal information of data subjects, with service providers whose servers may be located outside the borders of the Republic of South Africa ("RSA"). In particular:

- the **AI clinical scribe** stores data for its South African users on servers located in the European Union, which is subject to the EU General Data Protection Regulation ("GDPR");
- the **AI writing assistant** processes information outside the RSA. No patient personal information or health information is entered into it; and
- **e-mail, cloud storage and backup, website and online forms, patient messaging, internal staff messaging, staff time-keeping and bookkeeping** services may store information on servers outside the RSA.

Due care is taken in the selection of service providers to ensure that any transfer complies with Section 72 of POPIA, i.e. that the recipient is subject to a law, binding corporate rules or a binding agreement which provides an adequate level of protection substantially similar to POPIA, or that the transfer is otherwise permitted by law (e.g. with the consent of the data subject or where necessary for the performance of a contract with the data subject). The practice is not planning to send any other personal information about any data subject to any other third party in a foreign country. Should this be required, relevant data subject consent will be obtained where possible, and transfers of such information will occur in accordance with the requirements of the law.

10. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

The practice is committed to ensuring the security of the personal information in its possession or under its control in order to protect it from unauthorised processing and access, as well as loss, damage or unauthorised destruction. It continually reviews and updates its information protection measures to ensure the security, integrity and confidentiality of this information in accordance with industry best practices. The technical and organisational measures it adopts include:

- the physical securing of the offices where information is held, and the locking of cabinets with physical records;
- individual, password-protected user accounts for each employee and practitioner on the practice management system, diagnostic software and AI clinical scribe; employees must keep their login credentials confidential and may not share accounts;
- server and system access control, with access limited to what each role requires, and off-site data back-ups;
- a written AI use policy restricting staff to the approved tools listed in section 8, prohibiting the entry of patient personal or health information into general-purpose AI tools (such as AI writing

assistants and translation tools), and prohibiting the use of personal accounts or unapproved AI tools for practice work;

- review by the treating practitioner of all AI-generated clinical documentation before it is saved to the patient record;
- written operator agreements or binding terms with service providers that process personal information on the practice's behalf; and
- staff training on confidentiality, POPIA and the safe use of AI.

In addition, only those practitioners and employees who require access to the information to treat patients and discharge their functions are permitted access to the relevant information, and only if they have concluded agreements with or provided undertakings to the practice requiring them to implement appropriate security measures and to maintain the confidentiality of the information. **All employees have signed employment contracts and contract addenda covering confidentiality, privacy (POPIA) and the acceptable use of AI.** Contractors are required to adhere to the strict policies and processes implemented by the practice and are subject to sanctions for any security breach. All security breaches are taken seriously and are addressed in accordance with the law, including notification of the Information Regulator and affected data subjects in terms of Section 22 of POPIA where required.

11. PROCEDURE TO OBTAIN ACCESS TO RECORDS OR INFORMATION

The fact that information and records are held by the practice as listed in this Manual should not be construed as conferring upon any requester any right to that information or record. PAIA grants a requester access to records of a private body if the record is required for the exercise or protection of any right. If a public body lodges a request, the public body must be acting in the public interest. Access to records and information is not automatic. Any person who would like to request access to any of the above records or information is required to complete the prescribed request form (Form 2), referenced in Annexure A to this Manual, and pay the prescribed fees as referenced below. The request form is also available from:

- the Information Officer of the practice at the contact details stipulated above; and
- the Information Regulator at the contact details stipulated above.

The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester must identify the right he/she is seeking to exercise or protect and explain why the record requested is required for the exercise or protection of that right. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the request is made to the satisfaction of the Information Officer. Access to the requested records or information, or parts thereof, may be refused in terms of the law. Requesters will be advised of the outcome of their requests.

Data subjects who wish to object to the processing of their personal information, or to request its correction or deletion in terms of POPIA, may do so in writing to the Information Officer, using the forms prescribed in the POPIA Regulations (Form 1: objection; Form 2: correction or deletion), available from the Information Officer and the Information Regulator.

12. FEES PAYABLE TO OBTAIN THE REQUESTED RECORDS OR INFORMATION

The fees for requesting and accessing information and records held by the practice are prescribed in terms of PAIA. The fees payable, which may be amended from time to time in accordance with notices published in the Government Gazette, are referenced in Annexure B. Details of the fees payable and any change to such fees may be obtained from the Information Officer. The fees are also available on the

website of the Information Regulator. A requester may be required to pay the fees prescribed for searching and compiling the information which has been requested, including copying charges.

13. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available for inspection, free of charge, at the practice and on its website. A copy of the Manual may also be requested from the Information Officer against payment of the appropriate fee, which may be obtained from the Information Officer. This Manual is reviewed periodically and whenever the practice materially changes the way it processes personal information.

14. ANNEXURE A: INFORMATION AND RECORD REQUEST FORM

Form 2 – Request for access to record (Regulation 7 of the PAIA Regulations), available at www.inforegulator.org.za or from the Information Officer:

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

15. ANNEXURE B: FEES

Fees prescribed in terms of the PAIA Regulations, available at www.inforegulator.org.za or from the Information Officer:

<https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>