



# PAIA Manual

## Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 (PAIA)

**For Vitality Connect (Pty) Ltd**

(Registration Number:2024/198262/07)

**Date of Compilation:** 1 August 2024

**Information Officer:** Jeanine Groenewald

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## 1. Introduction

This manual is prepared in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA") and also addresses requirements of the Protection of Personal Information Act, No. 4 of 2013 ("POPIA"). It provides a guide on how to access information held by **Vitality Connect (Pty) Ltd** ("the Company"), which may be required to exercise or protect any rights.

## 2. Company Contact Details

Information	Details
Name of Company	Vitality Connect (Pty) Ltd
Registration Number	2024/198262/07
Postal Address	2 Computer Road, Montague Gardens, 7441
Physical Address	Same as postal
Email	vitality@vitalityconnect.co.za
Website	www.vitalityconnect.co.za
Information Officer	Jeanine Groenewald
Email (Information Officer)	privacy@vitalityconnect.co.za
Telephone	0826611934



### 3. The Section 10 Guide on How to Use PAIA

A guide on how to exercise rights under PAIA is available from the South African Human Rights Commission (SAHRC):

- **Contact details for the SAHRC:**

Website	<a href="http://www.sahrc.org.za">www.sahrc.org.za</a>
Telephone	+27 (0)11 877 3600
Email	<a href="mailto:PAIA@sahrc.org.za">PAIA@sahrc.org.za</a>
Postal Address	Private Bag 2700, Houghton, 2041

### 4. Records Available Without Request

Vitality Connect makes the following information automatically available via its website or upon request, without the need for a formal PAIA application:

- Company profile and wellness philosophy
- Published articles and blog content
- Courses, services, and product descriptions
- Newsletters and downloadable wellness tools
- Privacy Policy and Terms of Service

### 5. Records Held by Vitality Connect (Pty) Ltd

The Company holds records in the following categories, which may be requested via formal application under PAIA:

#### 5.1. Personnel Records

- Employment contracts
- Payroll records



- Leave records
- Pension and benefit details
- Medical aid and group scheme info

## **5.2. Client Information**

- Client wellness assessments
- Course enrolment data
- Coaching or consultation records
- Email correspondence

## **5.3. Operational Records**

- Supplier agreements
- Marketing and content documentation
- Sales and financial reports
- Policy and procedure documents

## **5.4. Company Records**

- CIPC registration documents
- Shareholder agreements
- MOI and resolutions
- Tax and statutory returns

## **5.5. Information Technology**

- Website analytics
- Customer databases



- Security and software systems

## 6. Request Procedure for Access to Records

To access records, a requester must submit a completed **Form C** (as per PAIA regulations), and send it to the Information Officer at the provided email or postal address.

A request must:

- Be in writing
- Provide sufficient details to identify the record
- State which right the requester wishes to exercise or protect
- Indicate the preferred form of access (email, inspection, copy)
- Include the requester's contact details

A **request fee** and **access fee** may apply as prescribed by regulation.

## 7. Grounds for Refusal of Access

Vitality Connect may legally refuse access to records based on grounds including:

- Protection of personal information of third parties
- Commercial information of the company
- Privileged or confidential documents
- Safety and health records of individuals
- Records legally prohibited from disclosure

## 8. Remedies Available Upon Denial

If access is denied, the requester may:

- Lodge an internal appeal (if applicable)



- Refer the matter to the **Information Regulator**
- Approach a court for relief

## **9. Access to Records Subject to POPIA**

Vitality Connect processes personal and health-related information as described in its **Health Data Privacy Policy** and general **Privacy Policy**, and complies fully with the 8 conditions for lawful processing under POPIA. Requests for personal data access, correction, or deletion must be directed to the Information Officer.

## **10. Availability of this Manual**

This manual is available:

- On request via email at [privacy@vitalityconnect.co.za](mailto:privacy@vitalityconnect.co.za)
- On our website at: [www.vitalityconnect.co.za/legal](http://www.vitalityconnect.co.za/legal)
- From the Human Rights Commission