

PAIA / POPIA Manual

Prof Ruan Goller's Practice

Prepared in terms of section 51 of the Promotion of Access to Information Act, 2000 (PAIA) and the Protection of Personal Information Act, 2013 (POPIA).

Effective date: 6 July 2026

Last reviewed: 6 July 2026

Website: <https://ruangoller.com/>

Important: This manual is prepared for publication on the practice website. The practice should periodically confirm the Information Officer, record-retention policy, third-party service providers and any PAIA/POPIA procedures used by the practice.

1. Introduction

This manual explains how members of the public may request access to records held by Prof Ruan Goller's practice and how the practice processes personal information.

PAIA gives effect to the constitutional right of access to information. For private bodies, access to a record may be requested where the record is required for the exercise or protection of a right, subject to the requirements and grounds of refusal set out in PAIA.

POPIA regulates the lawful processing of personal information and gives data subjects rights in relation to their personal information.

This manual is intended to assist patients, parents, guardians, caregivers, employees, service providers, referring practitioners, regulators and other requesters who wish to understand what records the practice holds and how to submit a request.

2. Practice Details

Name of private body: Prof Ruan Goller's Practice

Responsible person / head of private body: Prof Ruan Goller

Professional description: Paediatric Orthopaedic Surgeon / Specialist Orthopaedic Surgeon

Professional registration and practice details are available from the practice on request.

Website: <https://ruangoller.com/>

Email: reception@drgoller.co.za

Telephone: 012 807 2043

Pretoria practice address:

Faerie Glen Hospital Consulting Rooms

C/o Jacqueline Dr and Atterbury

Pretoria

George practice address:

Mediclinic George Consulting Rooms

2 Gloucester Ave

George Central

George

Postal address: Please contact the practice if a postal address is required.

3. Information Officer

Information Officer: Prof Ruan Goller, as head of the private body, unless another Information Officer is formally designated by the practice

Designation: Head of private body

Email: reception@drgoller.co.za

Telephone: 012 807 2043

Deputy Information Officer, if appointed: Not appointed unless formally designated by the practice

Email: reception@drgoller.co.za

Telephone: 012 807 2043

The Information Officer is responsible for receiving and coordinating PAIA requests, dealing with POPIA-related data subject requests, and supporting the practice's compliance with access-to-information and personal-information obligations.

4. Guide on How to Use PAIA

The Information Regulator South Africa makes available guidance on how to use PAIA and how to exercise access-to-information rights.

Information Regulator South Africa

Website: <https://info regulator.org.za/>

General enquiries: enquiries@info regulator.org.za

POPIA complaints: POPIAComplaints@info regulator.org.za

PAIA complaints: PAIAComplaints@info regulator.org.za

Postal address:

JD House

27 Stiemens Street

Braamfontein

Johannesburg

2001

Note: Contact details may change. Requesters should confirm the latest details on the Information Regulator's website.

5. Records Available Without a PAIA Request

The following information may be available without a formal PAIA request:

- Information published on the practice website
- General practice contact details
- General educational information about paediatric orthopaedic conditions
- Administrative information about appointment requests
- Public professional information required to be displayed by the practice
- Publicly available regulatory or professional registration information

Access to patient-specific records, clinical records, billing records, employee records, contracts, internal correspondence and other non-public records may require a formal request, proof of identity and proof of authority.

6. Categories of Records Held by the Practice

The practice may hold records in the following categories.

6.1 Patient and Clinical Records

- Patient intake information
- Parent, guardian and caregiver contact details
- Appointment records
- Consultation notes
- Medical history
- Clinical examination notes
- Diagnosis and treatment information
- Surgical or procedure-related records
- Consent forms
- Referrals and referral letters
- Prescriptions, where applicable
- Imaging reports and related clinical documents
- Laboratory or test reports, where applicable
- Correspondence with patients, parents, guardians, caregivers and healthcare providers
- Medical certificates or reports, where applicable

6.2 Administrative and Billing Records

- Patient account records
- Invoices and statements
- Payment records
- Medical scheme correspondence
- Authorisation records, where applicable
- Practice management records
- Appointment schedules
- Cancellation or non-attendance records

6.3 Practice Governance and Compliance Records

- Practice policies
- POPIA and PAIA records
- Consent records
- Complaints records
- Incident or breach records
- Regulatory correspondence
- Professional registration records
- Insurance and indemnity records
- Health and safety records, where applicable

6.4 Employee, Contractor and Service Provider Records

- Employment or contractor records

- Contact and identification information
- Payroll and tax records, where applicable
- Agreements and service contracts
- Confidentiality undertakings
- Access-control records
- Training and performance records, where applicable

6.5 Supplier, Hospital and Third-Party Records

- Supplier contracts
- Hospital or facility correspondence
- IT, hosting, email, billing and practice-management service records
- Professional correspondence
- Referral-network communication

6.6 Website and Communication Records

- Contact form submissions
- Email correspondence
- Website logs, where enabled
- Cookie or analytics records, where enabled
- Security and spam-prevention records
- Social media or online enquiry records, where applicable

7. Records Held in Terms of Other Legislation

The practice may hold records required under applicable South African law, including:

- Health Professions Act, 1974
- Ethical rules and guidance applicable to HPCSA-registered healthcare practitioners
- National Health Act, 2003
- Protection of Personal Information Act, 2013
- Promotion of Access to Information Act, 2000
- Consumer Protection Act, 2008, where applicable
- Basic Conditions of Employment Act, 1997, where applicable
- Labour Relations Act, 1995, where applicable
- Employment Equity Act, 1998, where applicable
- Income Tax Act, 1962
- Value-Added Tax Act, 1991, where applicable
- Companies Act, 2008, if applicable to the practice entity
- Occupational Health and Safety Act, 1993, where applicable
- Electronic Communications and Transactions Act, 2002

This list is not exhaustive.

8. How to Request Access to Records

A requester who wants access to a record held by the practice must submit a written PAIA request to the Information Officer.

The request should include:

- Full name and contact details of the requester
- Proof of identity
- If requesting on behalf of another person or a child, proof of authority to act
- A clear description of the record requested
- The right the requester wishes to exercise or protect
- An explanation of why the record is required to exercise or protect that right
- The preferred form of access, for example inspection, copy or electronic copy
- The requester's email address, postal address or other preferred response details

The practice may require the requester to complete the prescribed PAIA request form and pay any prescribed fees before processing the request, where applicable.

Requests must be sent to:

Information Officer: Prof Ruan Goller, as head of the private body, unless another Information Officer is formally designated by the practice

Email: reception@drgoller.co.za

Telephone: 012 807 2043

9. Requests on Behalf of Children or Patients

Because the practice treats children, requests for patient records may involve minors and sensitive health information.

The practice may require:

- Proof of the requester's identity
- Proof of parent, guardian or caregiver authority
- Consent from the patient or legally authorised person, where required
- Additional verification before releasing records
- Confirmation that release of the record is lawful, clinically appropriate and not contrary to any applicable legal or professional obligation

The practice may refuse or limit access where PAIA or another law permits or requires refusal, including where disclosure would unlawfully compromise another person's privacy, health, safety, confidentiality or rights.

10. Fees

PAIA allows certain request fees and access fees to be charged in prescribed circumstances.

The practice may charge fees for:

- Searching for and preparing records
- Photocopying or printing
- Scanning

- Electronic copies
- Postage or delivery
- Other prescribed access costs

Where fees apply, the requester will be informed before access is granted. Access may be withheld until applicable fees are paid.

No fee will be charged merely to submit a POPIA request for confirmation of whether the practice holds personal information about a data subject.

11. Timeframes

The practice will respond to a PAIA request within the period required by PAIA, unless an extension is permitted by law.

If a request is complex, involves a large number of records, requires third-party notification, or requires records held off-site or by a service provider, the practice may notify the requester of an extension where legally permitted.

12. Grounds for Refusal of Access

Access to a record may be refused where PAIA permits or requires refusal. Grounds may include:

- Protection of another person's privacy
- Protection of commercial information
- Protection of confidential information supplied by a third party
- Protection of the safety of individuals or property
- Protection of records privileged from production in legal proceedings
- Protection of research information, where applicable
- Requests that are manifestly frivolous, vexatious or involve an unreasonable diversion of resources
- Any other lawful ground of refusal under PAIA or another applicable law

If access is refused, the practice will provide reasons where required.

13. Remedies if Access Is Refused

If a requester is dissatisfied with the outcome of a PAIA request, the requester may have the right to lodge a complaint with the Information Regulator or approach a court, subject to the requirements of PAIA.

Information Regulator South Africa

Website: <https://info regulator.org.za/>

PAIA complaints: PAIAComplaints@info regulator.org.za

14. POPIA: Purpose of Processing Personal Information

The practice processes personal information for lawful and reasonable purposes, including:

- Responding to enquiries
- Booking, confirming and managing appointments
- Providing healthcare services
- Creating and maintaining patient records

- Communicating with patients, parents, guardians, caregivers and referring practitioners
- Managing referrals and clinical correspondence
- Obtaining consent for treatment, procedures and information processing
- Billing and account administration
- Medical scheme and authorisation administration
- Managing employees, contractors and service providers
- Complying with clinical, legal, tax, regulatory and professional obligations
- Protecting the rights, safety and wellbeing of patients and others
- Maintaining website functionality, security and spam protection
- Handling complaints, incidents and legal claims

15. Categories of Data Subjects

The practice may process personal information relating to:

- Patients
- Children treated or assessed by the practice
- Parents, guardians and caregivers
- Prospective patients and enquirers
- Referring healthcare practitioners
- Treating healthcare practitioners
- Employees and job applicants
- Contractors and service providers
- Hospital, medical scheme and administrator contacts
- Website users
- Regulators, professional bodies and legal representatives

16. Categories of Personal Information Processed

The practice may process:

- Names and surnames
- Identity or passport numbers, where required
- Date of birth and age
- Contact details
- Residential, postal or billing addresses
- Parent, guardian or caregiver details
- Medical history and health information
- Clinical notes, diagnoses and treatment information
- Consent records
- Referral information
- Imaging, laboratory or other clinical reports, where applicable

- Medical scheme and billing information
- Payment records
- Employment and contractor information
- Website and communication records
- Any other information reasonably required for healthcare, administration, compliance, safety or legal purposes

17. Special Personal Information and Children's Information

The practice processes health information and information relating to children. These categories require additional care under POPIA.

The practice processes such information only where it is necessary and lawful, including for healthcare services, appointment administration, consent management, billing, referral, record keeping, legal compliance, professional obligations, protection of vital interests, or another lawful basis.

Access to special personal information is restricted to authorised persons who require access for a legitimate purpose.

18. Recipients of Personal Information

Where lawful and necessary, personal information may be shared with:

- Treating or referring healthcare practitioners
- Hospitals and clinics
- Medical schemes and administrators
- Billing and accounting service providers
- Practice management system providers
- IT, email, website hosting and security service providers
- Payment providers, where applicable
- Legal advisers, auditors, insurers or professional indemnity providers
- Regulatory authorities, professional bodies or law enforcement where required
- Emergency services where necessary to protect health or safety

The practice expects third-party service providers to process personal information only for authorised purposes and with appropriate confidentiality and security safeguards.

19. Cross-Border Transfers

The practice may transfer or store personal information outside South Africa only where lawful and where appropriate safeguards are in place.

This may occur if the practice uses cloud-based email, hosting, analytics, backup, practice management, billing or communication service providers with systems located outside South Africa.

Known cross-border processors: To be confirmed periodically by the practice. Website hosting, email, analytics, security, backup, billing or cloud-based service providers may process or store information outside South Africa where lawful safeguards apply.

20. Security Measures

The practice takes reasonable technical and organisational measures to protect personal information. These may include:

- Confidentiality obligations
- Access controls
- Password protection
- Secure record storage
- Secure disposal of records
- Antivirus and security tools, where applicable
- Website spam and security protection, where applicable
- Limited access to patient records
- Staff awareness and administrative controls
- Service provider confidentiality and security requirements
- Backup and recovery procedures, where applicable

No system can be guaranteed to be completely secure. Security measures are reviewed and improved where appropriate.

21. Data Subject Rights

Subject to POPIA and other applicable law, a data subject may request:

- Confirmation that the practice holds personal information about them
- Access to their personal information
- Correction of inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained information
- Deletion or destruction of personal information where legally permitted
- Objection to certain processing
- Restriction of processing where applicable
- Information about the identity of third parties who have had access to their personal information, where legally required

Requests must be submitted to the Information Officer.

The practice may need to verify identity and authority before responding.

22. Direct Marketing

The practice does not use patient health information for unsolicited direct marketing.

If the practice sends newsletters or educational updates in future, it should do so only where lawful consent or another lawful basis exists, and recipients should be given a clear way to opt out.

Current direct marketing tools: None, unless the practice later implements a lawful newsletter or educational update system.

23. Record Retention

The practice retains records for as long as required or permitted by clinical, legal, regulatory, tax, professional and operational requirements.

Patient and clinical records may need to be retained for periods required by healthcare law, professional rules, hospital requirements, medical indemnity requirements or other applicable obligations.

Practice retention policy: Records are retained for periods required or permitted by applicable healthcare, professional, legal, tax and operational obligations.

Records that are no longer required should be securely deleted, destroyed or anonymised where appropriate and lawful.

24. Availability of This Manual

This manual is available:

- On the practice website: <https://ruangoller.com/>
- On request from the Information Officer
- At the practice, where reasonably practical

The practice may update this manual from time to time. The latest version should be published on the website.

25. Contact for PAIA and POPIA Requests

Information Officer: Prof Ruan Goller, as head of the private body, unless another Information Officer is formally designated by the practice

Email: reception@drgoller.co.za

Telephone: 012 807 2043

Pretoria: Faerie Glen Hospital Consulting Rooms, C/o Jacqueline Dr and Atterbury, Pretoria

George: Mediclinic George Consulting Rooms, 2 Gloucester Ave, George Central, George

26. Publication and Approval

Approved by: Prof Ruan Goller or authorised practice representative

Capacity: Head of private body / authorised practice representative

Date approved: 6 July 2026

Signature: _____

Next review date: 6 July 2027

Appendix A: PAIA Request Checklist

Before submitting a PAIA request, please ensure that you have included:

- Your full name
- Your contact details
- Proof of identity
- Proof of authority, if requesting on behalf of someone else or a child
- A clear description of the record requested
- The right you wish to exercise or protect

- Why the record is required for that right
- The preferred form of access
- Any relevant supporting documents

Appendix B: POPIA Request Checklist

For POPIA-related requests, please include:

- Your full name
- Your contact details
- Proof of identity
- The nature of the request, such as access, correction, deletion, objection or restriction
- Details of the personal information concerned
- Proof of authority, if requesting on behalf of someone else or a child
- Any relevant supporting documents

Appendix C: Website Publication Note

When publishing this manual on the website, also add a footer link titled:

PAIA / POPIA Manual

Recommended URL:

<https://ruangoller.com/paia-popia-manual/>

The Privacy Policy, Medical Disclaimer, Website Terms and Patient Information pages should link to this manual where relevant.