

PROFMED

PROFMED
PAIA MANUAL

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1. INTRODUCTION TO PROFMED

Profmed (“Profmed” / ”the Scheme”), a registered restricted membership medical scheme in terms of the Medical Schemes Act 131 of 1998, offers medical scheme benefits to graduate professionals. Profmed is administered by the Professional Provident Society Healthcare Administrators (“PPSHA”) and supported by various other contracted service providers, including managed healthcare organisations. The Scheme is subject to the authority of the Council for Medical Schemes (“CMS”). The Scheme is governed by a Board of Trustees, which has a statutory duty to keep beneficiary information confidential.

2. CONTACT DETAILS OF PROFMED

Principal Officer: Mr. Craig Comrie
Physical Address: Profmed Place, 15 Eton Road, Parktown, 2193, Johannesburg
Postal Address: P O Box 1004, Houghton, 2041
Telephone Number: 011 628 8900
E-mail address: craigc@profmed.co.za
Website address: www.profmed.co.za

3. INFORMATION AND DEPUTY INFORMATION OFFICERS OF PROFMED

Information Officer:

Mr Craig Comrie
Email: craigc@profmed.co.za
Tel no.: 011 628 8900

Deputy Information Officer:

Ms Beverley Carozzo
Email: beverleyc@profmed.co.za
Tel no.: 011 628 8900

4. GUIDE OF THE INFORMATION REGULATOR

The Information Regulator 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 this Act. This Guide contains, amongst others, the following information:

- The purpose of PAIA;
- The manner, form and costs of a request for access to information held by a body;
- Legal remedies when access to information is denied;
- Assistance that the Information Regulator can provide;
- Mechanisms to obtain the contact details of Information Officers; and
- Relevant legislation.

The Guide is available in all the official languages on the website (<https://www.justice.gov.za/infoereg/>) of the Information Regulator or can be obtained from the Information Regulator at:

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

Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017

E-mail address: enquiries@infoeregulator.org.za

The Guide can also be obtained upon request from the Information Officer of the Scheme. A copy of the Guide is available for public inspection during normal office hours at the offices of Profmed. During remote working periods, a copy of the Guide can be requested for inspection by arrangement with the Information Officer at informationofficer@profmed.co.za.

5. RECORDS

Profmed holds the following categories of records:

5.1 Statutory records:

Documents related to the registration of the Scheme in terms of the Scheme Medical Schemes Act, such as the Scheme Rules and its registration certificate; statutory returns; benefit guides; and other documents provided to the CMS and the Registrar of Medical Schemes.

5.2 Governance records:

Documentation related to the Board of Trustees and committees of the Scheme; the appointment or election of trustees and committee members; Board Charter, committees' terms of reference; protocols and policies; meeting packs and minutes; and other governance-related documents.

5.3 Employment / Appointment records:

Employment contracts; conditions of employment and work place policies; skills development plans and training records; salary register; relevant tax records; leave records; medical scheme membership records; and correspondence.

5.4 Health and safety records:

Evacuation plan; and health and safety incident reports.

5.5 Beneficiary records:

Membership records comprising, amongst others, application forms and supporting documentation; other forms and documents completed by beneficiaries; authorisation requests and decisions; funding decisions; records related to payment of contributions; medical reports; clinical motivations; benefit utilisation; relevant medical records; medical scheme membership history; tax certificates; claims statements; underwriting decisions; terminations; suspensions; complaints and disputes; and correspondence.

5.6 Broker records:

Agreements; payments; statutory records; and correspondence.

5.7 Health care service provider records:

Claims, statements and remittances; payments; agreements; and correspondence.

5.8 Employer group records:

Participating employer group records, including contribution payment records and correspondence.

5.9 Financial records:

Management accounts; Annual Financial Statements; auditor's reports; accounting records; bank statements; invoices, statements, receipts and related documents; tax returns and related documentation.

5.10 Records related to assets:

Asset register; purchase records; financing and lease agreements; sale and purchase agreements; delivery notes and orders; software licences; rental payments.

5.11 Service providers, vendors, consultants and suppliers:

Agreements; documents published in the public domain; market information and correspondence.

5.12 Other public and private body records:

Agreements; official documents and documents published in the public domain; minutes of meetings; and correspondence.

5.13 Legal records:

Legal opinions and advice; pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation; fraud investigations and related records.

5.14 Insurance records:

Insurance policies; claims records; and related records.

6. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Profmed holds the following records in terms of the specified legislation subject to the specific protection afforded by the law:

Applicable Legislation	Category of Records
Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995	Employment contracts, records and related documentation
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Records related to claims emanating from the workplace
Disaster Management Act 57 of 2002	COVID-19 screening records
Employment Equity Act 55 of 1998	Employment equity reports and related records
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Employees' tax-related records and records of payments made to directors, vendors, service providers and suppliers

Medical Schemes Act 131 of 1998 and Council for Medical Schemes Levies Act 58 of 2000	Beneficiary and broker records; agreements with its administrator and managed healthcare organisations
Occupational Health and Safety Act 85 of 1993	Health and safety incidents; ergonomic reports
Promotion of Access to Information Act 2 of 2000	PAIA Manual
Protection of Personal Information Act 4 of 2013	PAIA Manual and policies related to the protection of personal information, including a privacy and a record-keeping policy
Skills Development Levies Act 9 of 1999 and Skills Development Act 97 of 1998	Records related to payment of levies pertaining to skills development and skills development reports
Unemployment Contributions Act 4 of 2002 and Unemployment Insurance Act 63 of 2001	Records related to payment of UIF contributions and related employee records
Value Added Tax Act 89 of 1991	VAT records

7. RECORDS AUTOMATICALLY AVAILABLE

The Scheme records listed below are available without a person having to request access by completing Form 2. Access and usage of the records are subject to the Website Terms and Conditions as well as the Privacy Policy of Profmed.

Types of Records	Available on Website	Available on Scheme App to members only	Available upon request
Schedule of Benefits and other benefit guides and information, Annual Integrated Report, Rules of the Scheme, Scheme governance documents, including the Audit and Risk Committee charter	X		X
Member-specific membership information, claims documents and available benefits		X	X to members

8. PURPOSE OF PROCESSING PERSONAL INFORMATION

Profmed processes personal information of data subjects for the following purposes:

- To conduct the business of a medical scheme in terms of the Medical Schemes Act, including admission to membership, eligibility, risk assessment of beneficiaries, underwriting, risk management, disease management, benefit management, the assessment and payment of beneficiary claims, the collection of contributions and debts and for managed health care and forensic investigation purposes;
- For governance purposes;
- For employment and related matters;
- To verify provider details;
- To comply with relevant legislation;
- To report to persons and bodies as required and authorised in terms of the Rules, legislation or by the data subjects;
- For the maintenance of assets;
- For communication purposes;
- For marketing purposes;
- For client services;
- For procurement;
- For historical, statistical and research purposes;
- For enforcement of the Scheme's rights; and
- For any other lawful purpose, which directly relates to the business of a medical scheme.

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

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

9.1 Trustees, Committee Members and Nominees

Categories of personal information:

Full names and surnames; titles; identity numbers; age; addresses; contact details; nationalities; gender; qualifications; vetting reports; photos; other information included on nomination forms; curriculum vitae (“CVs”); declarations of interests; signatures of official signatories and proof of residence, if required by the bank; bank details, position held at the Scheme; recordings of virtual meetings; records of meeting attendance and participation, information included in minutes of meetings and participation in business-related matters / events on behalf of the Scheme; COVID-19 screening information, if applicable; and correspondence.

Potential recipients:

Officers, employees, beneficiaries, service providers, suppliers and vendors that assist the Scheme to provide the services and that perform functions related to the Scheme’s business on a need-to-know basis, subject to confidentiality undertakings where applicable; professional and legal advisers; accountants and auditors; insurers; law enforcement structures, including courts and tribunals; and relevant persons or entities as required or permitted by law, where the Scheme is under a duty to disclose or share the information in order to comply with any legal obligation or to protect the rights, property or safety of its business, employees, the public or others.

9.2 Employees and Job Applicants

Categories of personal information:

Full names and surnames; titles; identity numbers; age; addresses; contact details; positions or roles at the Scheme; nationalities; gender; race; qualifications; vetting reports; photos; employment history, references; other information included on CVs; relevant medical and disability information, if applicable; employment-related information such as sick certificates, performance and disciplinary records, salary information, tax numbers and employment history; bank details, next-of-kin; and correspondence.

Potential recipients:

Officers, employees, service providers, suppliers and vendors that assist the Scheme to provide the services and that perform functions related to the Scheme’s business on a need-to-know basis; vetting agencies; next-of-kin in emergency situations; professional and legal advisers; accountants and auditors; insurers; law enforcement structures, including courts and

tribunals; and relevant persons or entities as required or permitted by law, where the Scheme is under a duty to disclose or share the information in order to comply with any legal obligation or to protect the rights, property or safety of its business, employees, the public or others.

9.3 Beneficiaries

Categories of personal information:

Full names and surnames; titles; addresses; contact details; identity numbers; dates of birth; age; gender; race; home language; employment details (e.g., employer, employee number, employment date); dependants' details; nationality; qualifications and professions; relationship of dependant to principal member; dependant status; income; bank details; health information, including pre-existing conditions, pregnancy, diagnoses and treatment; previous medical scheme cover; details of treating providers; membership contributions and payment-related information; authorisation requests, claims, funding decisions, benefit allocation and benefit utilisation; waiting periods and late joiner penalties; membership entry and termination dates; information related to complaints and disputes; telephone call recordings; completed Scheme documents, such as consent forms, including members' signatures; and correspondence.

Potential recipients:

Officers, employees, service providers, suppliers and vendors that assist the Scheme to provide the services and that perform functions related to the Scheme's business on a need-to-know basis; principal member in respect of relevant personal information, including health information, of their dependants to ensure the efficient administration of their membership and benefits and to prevent fraud; suppliers and service providers who perform functions related to the administration of the Scheme's business and the provision of managed health care services on a need-to-know basis and subject to confidentiality undertakings; member selected representatives (brokers / healthcare consultants); regulatory and other public or private bodies, persons or entities, as permitted in terms of the Rules, legislation, the relevant beneficiary, or as may be required or permitted in terms of the law (e.g., the CMS); banks; South African Revenue Services ("SARS"); professional and legal advisers; accountants and auditors; credit rating agencies for beneficiaries who have defaulted on the payment of their contributions or other debt owed to us; debt collectors / attorneys when contributions are outstanding; attorneys tracing Road Accident Fund claims; insurers; and relevant persons or entities as required or permitted by law, where the Scheme is under a duty to disclose or share the information in order to comply with any legal obligation or to protect the rights, property or safety of its business, employees, the public or others.

9.4 Brokers

Categories of personal information:

Names and surnames and identity numbers of individual brokers; contact details; relevant staff members' / contact persons' names, surnames and contact details; addresses; website addresses; organisation names; qualifications; licences; accreditation and broker codes/reference numbers; agreements; performance profiles; complaints; remuneration; payment information, including bank details and VAT numbers; completed forms, including signatures; confidential correspondence.

Potential recipients:

Officers, employees, service providers, suppliers and vendors that assist the Scheme to provide the services and that perform functions related to the Scheme's business on a need-to-know basis; relevant statutory and other public bodies; auditors; banks; insurers; legal and professional advisers; and relevant persons or entities as required or permitted by law, where the Scheme is under a duty to disclose or share the information in order to comply with any legal obligation or to protect the rights, property or safety of its business, employees, the public or others.

9.5 Healthcare Providers

Categories of personal information:

Full names and surnames / entity names; titles; addresses; contact details; practice code numbers; qualifications; website addresses; relevant staff members' / contact persons' names, surnames and contact details; bank details; bank verification letters; designated service provider (DSP) / preferred provider network status; claims, remittance advices and payment related information; utilisation of Scheme benefits; and correspondence.

Potential recipients:

Officers and employees; beneficiaries; banks; SARS; professional and legal advisers; accountants and auditors; insurers; and relevant persons or entities as required or permitted by law, where the Scheme is under a duty to disclose or share the information in order to comply with any legal obligation or to protect the rights, property or safety of its business, employees, the public or others.

9.6 Employer Groups

Categories of personal information:

Names, locations and addresses; names, surnames and contact details of contact persons; contribution payment and related information; number of employees; bank details; and correspondence.

Potential recipients:

Officers and employees; professional and legal advisers; accountants and auditors; insurers; and relevant persons or entities as required or permitted by law, where the Scheme is under a duty to disclose or share the information in order to comply with any legal obligation or to protect the rights, property or safety of its business, employees, the public or others.

9.7 Suppliers, Vendors, Other Persons and Public and Private Bodies

Categories of personal information:

Entity names, addresses, contact details and website addresses; names, surnames, titles, contact details and positions of contact persons; qualifications; licences; accreditation status; performance; proposals, agreements and related information; payment information including banking details and VAT numbers; official documentation, such as newsletters and brochures; BBEE status; FTP details; COVID-19 screening information of visitors to the Scheme's offices; and correspondence.

Potential recipients:

Officers and employees; members; professional and legal advisers; accountants and auditors; our insurers; and relevant persons or entities as required or permitted by law, where the Scheme is under a duty to disclose or share the information in order to comply with any legal obligation or to protect the rights, property or safety of its business, employees, the public or others.

9.8 Insurers

Categories of personal information:

Entity names, addresses, contact details and website addresses; names, surnames, titles, contact details and positions of contact persons; claims; payment-related information, including banking details; correspondence.

Potential recipients:

Relevant officers and employees; professional and legal advisers; accountants and auditors; relevant persons or entities as required or permitted by law, where the Scheme is under a duty to disclose or share the information in order to comply with any legal obligation or to protect the rights, property or safety of its business, employees, the public or others.

10. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

Details of beneficiaries, who are abroad and in need of emergency treatment and care, are directed to the Scheme's international emergency service providers and to treating healthcare providers in the relevant countries. Profmed shares the relevant information of members residing in Namibia with relevant healthcare providers in Namibia. Profmed 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, if required, and transfers of such information will occur in accordance with the requirements of the law.

11. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

Profmed 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 measures it adopts to ensure the security of personal information includes technical and organisational measures and internal policies to prevent unauthorised access, loss or use of personal information, for example, the physical securing of hard-copy records, access control to records of personal information and off-site data back-ups. In addition, only those employees, office-bearers and service providers that require access to the information to discharge their functions relating to Profmed's business and the services Profmed provides will be permitted access to the relevant information and only if they have concluded agreements with or provided undertakings to Profmed regarding the implementation of appropriate security measures, maintaining the confidentiality and processing the information only for the agreed purposes. Profmed will inform data subjects and the Information Regulator if any person has unlawfully obtained access to this information, subject to the provisions of the law.

12. PROCEDURE TO OBTAIN ACCESS TO RECORDS OR INFORMATION

The fact that information and records are held by Profmed 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 a request form, which is available on the website of the Scheme, from the Information Officer of the Scheme and from 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/it 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 of the records or information may be refused in terms of the law. Requesters will be advised of the outcome of their requests.

13. FEES PAYABLE TO OBTAIN THE REQUESTED RECORDS OR INFORMATION

Fees may be charged for requesting and accessing information and records held by Profmed. These fees are prescribed in terms of PAIA. Details of the fees payable may be obtained from the Information Officer. The fees are also available from the Information Regulator

14. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available for inspection, free of charge, at Profmed's offices during office hours and on its website. During remote working periods, a copy of the Manual can be requested for inspection by arrangement with the Information Officer at informationofficer@profmed.co.za. A copy of the Manual may also be requested from the Information Officer against payment of a fee as may be applicable.

Issued by:
Mr. Craig Comrie
Principal Officer
Profmed