

PraxiLog (Pty) Ltd

Registration Number: 2026/581918/07

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 (PAIA)

Incorporating amendments under the Protection of Personal Information Act 4 of 2013 (POPIA)

Entity Name:	PraxiLog (Pty) Ltd
Registration Number:	2026/581918/07
Document Version:	1.2 (Final)
Date of Last Revision:	11 August 2026
Applicable Statutory Bodies:	Information Regulator (South Africa), HPCSA, CIPC

TABLE OF CONTENTS
1. Introduction & Purpose of this Manual
2. Information Officer & Contact Details
3. Guide on How to Use PAIA (Section 10 Guide)
4. Categories of Records Automatically Available
5. Records Kept Pursuant to Other Legislation
6. Categories of Records Held by PraxiLog
7. Processing of Personal Information Under POPIA
8. Request Procedure Under PAIA
9. Grounds for Refusal of Access

1. INTRODUCTION & PURPOSE OF THIS MANUAL

PraxiLog (Pty) Ltd provides software-as-a-service practice management, electronic medical record-keeping, and AI-assisted clinical drafting tools to registered healthcare practices across South Africa.

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and reflects the privacy and governance requirements under the Protection of Personal Information Act 4 of 2013 ("POPIA"). The purpose of this Manual is to facilitate access to records held by PraxiLog and to outline the statutory procedure for exercising data access rights.

2. INFORMATION OFFICER & CONTACT DETAILS

In accordance with Section 55 of POPIA, the Information Officer is responsible for ensuring compliance with PAIA and POPIA requests.

Company Name:	PraxiLog (Pty) Ltd
Registration Number:	2026/581918/07
Information Officer:	Kagiso Ditabo
Designation:	Managing Director
Physical Address:	1 Black Thorn Road, Theresapark, Pretoria, 0182, South Africa
General Enquiries:	hello@praxilog.co.za
POPIA / PAIA Email:	popia@praxilog.co.za
Website:	www.praxilog.co.za

3. GUIDE ON HOW TO USE PAIA (SECTION 10 GUIDE)

The South African Information Regulator has compiled an official guide under Section 10 of PAIA, detailing how any person may exercise their rights under PAIA and POPIA. The Guide is available in all 11 official South African languages at <https://infoeregulator.org.za/> or via email at enquiries@infoeregulator.org.za.

4. CATEGORIES OF RECORDS AUTOMATICALLY AVAILABLE

The following records are publicly available without requiring a formal PAIA request:

- Public website content and product marketing documentation.
- Published Terms of Service and Privacy Policy.
- This PAIA Manual.

5. RECORDS KEPT PURSUANT TO OTHER LEGISLATION

Where applicable, PraxiLog maintains statutory records in accordance with the following legislation:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Income Tax Act 58 of 1962 & Value Added Tax Act 89 of 1991
- Protection of Personal Information Act 4 of 2013

6. CATEGORIES OF RECORDS HELD BY PRAXILOG

Access to non-public records must be requested using the formal procedure in Section 8:

- **Corporate & Operational Records:** Company incorporation documents, internal governance policies, infrastructure logs.
- **Financial Records:** Tax returns, accounting ledgers, subscription transaction logs.
- **Account & Practice Records:** Practice account profiles, practitioner statutory registration details, role configurations.

IMPORTANT NOTE ON PATIENT CLINICAL DATA: PraxiLog processes patient personal and health information strictly as an **Operator** on behalf of subscriber Practices (the **Responsible Parties**). All requests for patient medical records, clinical notes, or medical history exports must be lodged directly with the relevant healthcare Practice, not with PraxiLog.

7. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

A. Purpose: Operating SaaS practice management software, AI consultation drafting, processing subscriptions, and maintaining audit trails.

B. Categories of Data Subjects: Practitioners, practice staff, and patient data held on behalf of practices.

C. Cross-Border Transfers: Sub-processors (Google Cloud Platform, Clerk, Neon, PayFast) process data under strict data processing agreements compliant with POPIA Section 72 and GDPR standards.

8. REQUEST PROCEDURE UNDER PAIA

1. Complete **Form 2 (Request for Access to Record)** as published by the Information Regulator.
2. Submit the form via email to popia@praxilog.co.za or deliver to the physical address listed in Section 2.
3. Pay the prescribed request fee (where applicable). PraxiLog will communicate its decision within 30 calendar days.

9. GROUNDS FOR REFUSAL OF ACCESS

Requests may be refused on statutory grounds, including mandatory protection of third-party privacy, protection of trade secrets/ commercial confidentiality, or safeguarding platform cyber-security.