

PAIA Manual

of

Boehringer Ingelheim (Proprietary Limited)

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1. Definitions and Interpretation:

1.1. Words defined in this PAIA Manual shall bear the meaning assigned in PAIA unless otherwise indicated.

1.2. The following words, phrase, abbreviations and/or acronyms are defined as:

1.2.1. “**Access Fee**” means the fee referred to at clause 7.5.5.5;

1.2.2. “**CEO**” means chief executive officer;

1.2.3. “**Constitution**” means the Constitution of the Republic of South Africa, 1996;

1.2.4. “**Data Subject**” bears the meaning prescribed in terms of section 1 of POPIA;

1.2.5. “**Deposit**” means the fee referred to at clause 7.5.5.6;

1.2.6. “**Deputy Information Officer**” bears the meaning as prescribed in POPIA;

1.2.7. “**ECTA**” means the Electronic Communications and Transactions Act No. 25 of 2002, as amended from time to time;

1.2.8. “**Form**” means a prescribed form published in terms of either the PAIA Regulations or the POPIA Regulations and which may be reproduced in a sufficiently similar format by the Private Body;

1.2.9. “**Guide**” means the guide referred to section 10 of PAIA and otherwise referred to herein at clause 4;

1.2.10. “**Head of Private Body**” bears the meaning prescribed in terms of section 1 of PAIA;

1.2.11. “**Information Officer**” means an information officer as defined in terms of section 1 of POPIA and being the authorised person of the Private Body listed in Schedule 1 herein;

1.2.12. “**Information Regulator**” shall bear the meaning as described in POPIA;

1.2.13. “**Minister**” means the Minister of Justice and Correctional Services;

1.2.14. “**PAIA**” means the Promotion of Access to Information No. 2 of 2000, as amended from time to time;

1.2.15. “**PAIA Manual**” means this PAIA manual inclusive of all Schedules, annexures and/or Forms;

1.2.16. “**PAIA Regulations**” means the Regulations Relating to the Promotion of Access to Information Act, 2021, as amended from time to time;

1.2.17. “**Personal Information**” shall have the meaning ascribed under section 1 of POPIA;

- 1.2.18. **“POPIA”** means the Protection of Personal Information Act No. 4 of 2013, as amended from time to time;
- 1.2.19. **“POPIA Regulations”** means the Regulations Relating to the Protection of Personal Information Act, 2018, as amended from time to time;
- 1.2.20. **“Private Body”** means the body defined in Schedule 1 and also referred to herein as **“us”**, **“we”** and/or **“our”**;
- 1.2.21. **“Processing”** / **“Processes”** bears the meaning prescribed in terms of section 1 of POPIA;
- 1.2.22. **“Reproduction Fee”** means the fee referred to at clause 7.5.5.4;
- 1.2.23. **“Republic”** means the Republic of South Africa;
- 1.2.24. **“Request Fee”** means the fee referred to at clause 7.5.5.3; and
- 1.2.25. **“Schedule”** means a schedule to this PAIA Manual and forming part of this PAIA Manual.

2. Introduction & Purpose of PAIA Manual

In terms of section 32 of the Constitution everyone has a right of access to any information held by the state and any information held by another person that is required for the exercise or protection of any rights.

- 2.1. PAIA was enacted to give effect to the constitutional right of access to information. PAIA came into operation on 09 March 2001.
- 2.2. In terms of the Constitution and the PAIA, all people in the Republic, including non-nationals, can request information from public and private bodies.
- 2.3. PAIA provides for certain access rights of a requester to a record of a private body if:
- 2.3.1. that record is required for the exercise or protection of any of his or her legal rights;
 - 2.3.2. the requestor complies with all procedural requirements; and
 - 2.3.3. access is not refused in terms of any ground referred to in the PAIA or other applicable law.
- 2.4. In terms of section 51 of the PAIA, private bodies are required to publish a manual to assist requesters who wish to request access to a record held by the private body.
- 2.5. The purpose of this PAIA Manual is to inform any requester of the procedure to follow in order to apply to access information held by the Private Body.

2.6. The PAIA Manual also seeks to align with the requirements required in terms of POPIA when it comes to the lawful processing of Personal Information by the Private Body.

2.7. The PAIA Manual is therefore useful for the public to-

2.7.1. Advise the postal and street address, phone and fax number and, if available, electronic mail address of the Head of the Private Body and such other information as may be prescribed from time to time;

2.7.2. a description of the Guide and how to obtain access to it;

2.7.3. the categories of record of the Private Body which are available without a person having to request access in terms of the PAIA;

2.7.4. a description of the records of the Private Body which are available in accordance with any other legislation; and

2.7.5. sufficient detail and understanding of how to make a request for access to a record of the Private Body by providing a description of the subjects on which the Private Body holds records of and the categories of records held on each such subject;

2.7.6. In so far as POPIA is concerned:

2.7.6.1. whether the Private Body Processes Personal Information;

2.7.6.2. the purpose of the Processing;

2.7.6.3. a description of the categories of data subjects and of the information or categories of information relating thereto;

2.7.6.4. the recipients or categories of recipients to whom the Personal Information may be supplied;

2.7.6.5. any planned trans-border flows of Personal Information; and

2.7.6.6. a general description to know whether the Private Body has appropriate security measures to ensure the confidentiality, integrity and availability of Personal Information which is to be Processed.

3. PAIA key contact details for access to information of the Private Body

The contact details of the Private Body, Head of the Private Body, Information Officer and any Deputy Information Officers are as stipulated in Schedule 1.

4. Guide on how to use the PAIA and how to obtain access to the Guide

- 4.1. The Information Regulator has amended, updated and made available the revised Guide on how to use PAIA in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. Any person, irrespective of citizenship, can apply for access to information under the PAIA.
- 4.2. Members of the public can inspect or make copies of the Guide from the office of the Private Body, including the office of the Information Regulator, during normal working hours.
- 4.3. The Guide can also be obtained-
 - 4.3.1. upon written request directed to the Information Officer using contact details displayed per Schedule 1;
 - 4.3.2. from the website of the Information Regulator (<https://www.justice.gov.za/infoereg/>); or
 - 4.3.3. upon request to the Information Regulator using the prescribed PAIA Form.
- 4.4. The Guide will be made available in the following official language, by the Private Body, which is English.

5. Availability of the PAIA Manual

This PAIA Manual is available to any person of the public:

- 5.1 on the Private Body's website as specified in Schedule 1;
- 5.2 at the Private Body's registered address stipulated in Schedule 1 for inspection during normal working hours.
- 5.3 upon written request from the Information Officer using the contact details provided in Schedule 1.

6. Policy with regard to confidentiality and access to information

The Private Body will protect the confidentiality of information provided to it by third parties, subject to the Private Body's obligations to disclose information in terms of any applicable law or a court order requiring disclosure of the information. If access is requested to a record that contains information about a third party, the Private Body is obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted, or not.

7. Classes of Records

- 7.1. **Categories of records of Private Body which are available without a person having to request access (i.e. available automatically available to the public) (section 51(1)(b)(ii) of the PAIA)**

The categories of records of the Private Body which are automatically available to the public without the

requester being required to request access via the PAIA Form 2 and/or pay the prescribed fee, are as specified in Schedule 2 hereunder, and may be accessed as indicated further in Schedule 2 either via the website of the Private Body or on request to the Information Officer, using the details prescribed in Schedule 1.

7.2. Description of the records of the private body which are available in accordance with any other legislation (section 51 (1)(b)(iii) of the PAIA)

Records are kept in accordance with such other legislation as applicable to the Private Body and which includes, but may not be limited to, the legislation as specified in Schedule 3 herein. Although the Private Body has used its best endeavours to supply a list of applicable legislation, it is possible that the list may be incomplete. Whenever it comes to the Private Body's attention that existing or new legislation allows a requester access on a basis other than that set out in PAIA, we reserve the right to update the list accordingly.

7.3. A description of the subjects on which the Private Body holds records and the categories of records held on each subject (section 51(1)(b)(iv) of the PAIA)

A description of the subjects on which the Private Body holds records and the categories of records held on each subject and for which a request may be submitted for assessment to potentially access such information is as specified in terms of Schedule 4.

7.4. Details on how to make a request for access to a record held by the Private Body (section 51(1)(b)(iv) of the PAIA):

metadataprotection.ae@boehringer-ingelheim.com

- 7.4.1 The purpose of this section is to provide requesters with sufficient guidelines and procedures to facilitate a request for access to a record held by the Private Body.
- 7.4.2 An application for access to information may be refused in the event that the application does not comply with the procedural requirements of PAIA or other applicable legislation
- 7.4.3 In addition, the successful completion and submission of any access request form does not automatically allow the requester access to the requested record
- 7.4.4 An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 Chapter 4 of PAIA (refer further to clause 8).
- 7.4.5 If it is reasonably suspected that the requester has obtained access to the Private Body's records through the submission of materially false or misleading information, legal proceedings may be instituted against the requester.

7.5. Guidance on completion of prescribed access form (section 51(1)(b)(iv) of the PAIA):

- 7.5.1 In order for the Private Body to process a request to access a record, a requester is required to complete the prescribed PAIA Form 2. The Private Body may be requested to provide such Form which the Private Body may reproduce in a sufficiently similar format and make available to requesters.

- 7.5.2 The Form must be completed in full, failure to do so may result in the process being delayed until such additional information is provided. The Private Body will not be held liable for delays due to receipt of incomplete forms.
- 7.5.3 Due regard should be taken of the following instructions when completing PAIA Form 2 as the Information Officer or Deputy Information Officer shall not process any request for access to a record until satisfied that all requirements have been met:
- 7.5.3.1 PAIA Form 2 must be completed in the English language;
 - 7.5.3.2 Proof of identity is required to authenticate the requester's identity. If the requester acts as an agent on behalf of the requester, the requester must provide proof of the identity of the person on whose behalf the request is made, the authority or mandate given to the requester by such person and proof of the identity of the requester as provided above;
 - 7.5.3.3 Type or print in BLOCK LETTERS an answer to every question;
 - 7.5.3.4 If a question does not apply, state "N/A" in response to that question;
 - 7.5.3.5 If there is nothing to disclose in reply to a particular question, state "nil" in response to that question;
 - 7.5.3.6 If there is insufficient space on the printed Form in which to answer a question, additional information may be provided on an additional attached folio; and
 - 7.5.3.7 when the use of an additional folio is required, precede each answer thereon with the title applicable to that question;
 - 7.5.3.8 The Information Officer must assist a requester with any request with regards to a request for access to information and if a request to a record is made orally as a result of illiteracy or a disability of a requester, the Information Officer must complete PAIA Form 2 on behalf of the requester and provide a copy thereof to the requester.
- 7.5.4 Submission of the prescribed access Forms:
- 7.5.4.1 PAIA Regulations Form 2 must be submitted either via conventional mail, e-mail or by hand to the Private Body and marked for the attention of the Information Officer, using the contact details as specified in Schedule 1.
 - 7.5.4.2 Notwithstanding clause 7.5.4.1, should the Private Body enable the capturing of PAIA Form 2 electronically, via its website(s), or other electronic platform, then PAIA Form 2 can be submitted using this method made available by the Private Body.

7.5.5 Payment of prescribed fees:

7.5.5.1 Payment details can be obtained from the Information Officer or Deputy Information Officer and payment can be made via an electronic funds transfer (EFT) with proof of payment to be provided to the Information Officer, via e-mail (refer to Schedule 1 for details). Records may be withheld until the required fees have been paid.

7.5.5.2 Four types of fees are provided for in terms the PAIA:

7.5.5.3 **Request Fee:** An initial prescribed non-refundable R140.00 (one hundred and forty rand) (VAT exc.) is payable on submission of a request made in terms of the PAIA. This fee is not applicable to personal requesters, referring to any person seeking access to records that contain his/her/its own Personal Information which is regulated in terms of section 26 of the POPIA;

7.5.5.4 **Reproduction Fee:** This fee is payable with respect to all records that are automatically available as provided for in terms of clause 7.1. The fee payable shall be charged in accordance with the Prescribed Fees.

7.5.5.5 **Access Fee:** If the request for access is successful an Access Fee may be required to reimburse the Private Body for the reasonable costs involved in the search, reproduction and/or preparation of the record and will be calculated based on the Prescribed Fees.

7.5.5.6 **Deposit:** a Deposit of $\frac{1}{3}$ (one-third) of the amount of the applicable Access Fee, is payable if the Private Body receives a request for access to information held by the Private Body and the preparation for the record will take more than 6 (six) hours. In the event that access is refused to the requested record, the full Deposit will be refunded to the requester.

7.5.6 Notification and applicable time periods:

7.5.6.1 If the search for a record of the Private Body in respect of which a request for access by a requester has been made and the preparation of the record for disclosure would, in the opinion of the Information Officer of the Private Body concerned, require more than the hours prescribed for this purpose for requesters, the Information Officer must by notice require the requester to pay a Deposit as referred to in clause 7.5.5.6 above.

7.5.6.2 The Private Body will inform the requester within 30 (thirty) days after the receipt of the request of its decision whether or not to grant the request (if required) to that effect.

7.5.6.3 The Private Body may extend the period of 30 (thirty) days if the request is for a larger number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the Private Body's activities, or the records are not located at the Private Body's registered place of business or consultations amongst divisions and/or subsidiaries of the Private Body are required to

attend to the processing of the request, or another private or public body are required. The Private Body will notify the requester in writing should an extension be sought.

7.5.6.4 If the request for access to a record is successful the requester will be notified of the following:

7.5.6.4.1 The amount of the Access Fee payable upon gaining access to the record;

7.5.6.4.2 an indication of the form in which the access will be granted; and

7.5.6.4.3 notice that the requester may lodge an application with a court against the payment of the Access Fee and the procedure, including the period, for lodging the application.

7.5.6.5 If the request for access to a record is not successful the requester will be notified of the following:

7.5.6.5.1 adequate reasons for the refusal (refer to third party information and grounds for refusal at clause 8); and

7.5.6.5.2 that the requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

7.5.6.6 Records that cannot be found or do not exist:

If the Private Body has searched for a record that is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include steps that were taken to try locate the record.

8. Grounds for refusal of access to records and appeal

8.1. Grounds for refusal (Chapter 4):

8.1.1. The 30 (thirty) day period within which the Information Officer is required to reply to a request, as stipulated in the PAIA, shall commence only once a requester has complied with all the requirements of the PAIA in requesting access to a record, to the satisfaction of the Information Officer. Requests may be refused on the following grounds, as set out in the PAIA:

8.1.1.1. Mandatory protection of privacy of a third party who is a natural person, including a deceased person, which would involve the unreasonable disclosure of Personal Information of that natural person;

8.1.1.2. Mandatory protection of commercial information of a third party or Private Body, if the record contains:

8.1.1.3. Trade secrets of the third party or of the Private Body;

8.1.1.4. Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party or Private Body;

8.1.1.5. Information disclosed in confidence by a third party to Private Body if the disclosure could put that third party to a disadvantage or commercial competition;

8.1.1.6. Mandatory protection of certain confidential information of a third party if disclosure of the record would result in a breach of a duty of confidence owed to that party in terms of an agreement;

8.1.1.7. Mandatory protection of the safety of individuals, and the protection of property;

8.1.1.8. Mandatory protection of records privileged from production in legal proceedings, unless the legal privilege has been waived; and

8.1.1.9. Mandatory protection of research information of a third party and of the Private Body.

8.2. Remedies available in the event of a refusal of a request for information (Appeal):

8.2.1. The Private Body does not have internal appeal procedures and as such, the decision made by the Information Officer is final.

8.2.2. Should the requester be dissatisfied with the decision to refuse access, that person may within 30 (thirty) days after notification of the refusal, apply to the applicable court for the appropriate relief.

8.2.3. Notwithstanding the aforesaid, a requester may lodge a complaint with the Information Regulator in the prescribed Form (PAIA Form 5).

9. Processing of personal information in terms of the POPIA

The Private Body regards the privacy and protection of Personal Information seriously and will only process Personal Information in terms of the provisions of POPIA or any other applicable law, as more fully set out in the Private Body's privacy policy accessible on the Private Body's website (refer to Schedule 1 for details of website).

9.1. Purpose of Processing Personal Information (section 51(1)(c)(i) of the PAIA):

We may use your Personal Information;

- 9.1.1 to deliver our products and/or services;
- 9.1.2 to interact with you in any way or manner;
- 9.1.3 to enter any contract or other business relationship with you (whether in writing or otherwise);
- 9.1.4 to personalise features and content (such as services, products and advertisements) and make suggestions for you (such as pages, products and/or services and information you may be interested in or topics you may want to follow) on or about our products and/or services or on our website(s) or any other medium through which we communicate with you from time to time;
- 9.1.5 to create personalised content that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data we collect and learn from you and others (including any data with special protections you choose to provide); how you use and interact with us and/or our website(s); and the people, places, or things you're connected to and interested in, on and off our website(s);
- 9.1.6 to develop, test and improve our products and/or services and/or our website(s), including by conducting surveys and research, and testing and troubleshooting new products and services and features;
- 9.1.7 to select and personalise advertisements, offers and other sponsored content that we show you;
- 9.1.8 to provide measurement, analytics, and other business services;
- 9.1.9 we use the information we have (including your activity of our products and/or services, such as the websites you visit and advertisements you see) to help advertisers and other partners measure the effectiveness and distribution of their advertisements and services, and understand the types of people who use their services and how people interact with their websites, apps, and services;
- 9.1.10 to promote safety, integrity and security, we may share your information to credit bureaus to conduct credit checks on you, to verify your credit rating. To conduct background checks on you for any previous convictions and/or criminal or corrupt activities, to check for account activity, combat harmful conduct, detect and prevent money laundering or similar corrupt activities, and to share any such information with the required authorities. To prevent spam and other bad experiences, maintain the integrity of our products and/or services, and promote safety and security of our products and/or services. For example, we use data we have to investigate suspicious activity or violations of our terms or policies;
- 9.1.11 to communicate with you. We use the information we have to send you marketing communications, communicate with you about our products and/or services, and let you know about our policies and terms. We also use your information to respond to you when you contact us;
- 9.1.12 research and innovate for social good. We use the information we have (including from research partners we collaborate with) to conduct and support research and innovation on topics of general technological advancement of our products and/or services and/or our website(s);

9.1.13 for helping us in any future dealings with you;

9.1.14 to manage our contractual employee and/or recruitment relationships; and

9.1.15 for any other purpose as legally authorised to do and as is allowed by law.

9.2. **Description of the categories of Data Subjects and of the information or categories of information relating thereto (section 51(1)(c)(ii) of the PAIA):**

Categories of Data Subjects	Personal Information that may be Processed
Customers / clients	<p>If you are an individual:</p> <ul style="list-style-type: none"> information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth date; information relating to the education or the medical, financial, tax information, banking details, criminal or employment history of the person, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier; name, surname, identification number, biometric information, opinions, views or preferences; <p>If you are a company, trust, closed corporation, or other legal entity:</p> <ul style="list-style-type: none"> Name, registration number, symbol, e-mail address, physical address, telephone number, location information, tax information, banking details, online identifier or information, opinions, views or preferences; <p>If you make use of any of our products and/or services:</p> <ul style="list-style-type: none"> We collect your consent, communications and other information you provide when you interact with us or if you make use of our products and/or services, whether in person or electronically, whether through a formal written agreement or whether by means of a purchase order, quotation, invoice or otherwise; We track the number of orders, encounters, sales or interactions we have with you for our and your business interest. Such as the number of times you make use of our products and/or services; the reasons for which you make use of our products and/or services; the types of products and services you view or engage with; the features of the products and services you use; the actions you take; our employees you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our products and/or services, and what reviews

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	<p>you make or views you may have in regard to our products and services. We also collect information about how you use certain features of our products and/or services. We also track the number and regularity of payments to and of our accounts.</p>
<p>Service providers / vendors / sub-suppliers / sub-vendors / independent contractors / representatives and/or agents or suppliers / vendors / sub-suppliers</p>	<p>If you are an individual:</p> <ul style="list-style-type: none"> information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth date; information relating to the education or the medical, financial, tax information, banking details, criminal or employment history of the person, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier; name, surname, identification number, biometric information, opinions, views or preferences; <p>If you are a company, trust, closed corporation, or other legal entity:</p> <ul style="list-style-type: none"> Name, registration number, symbol, e-mail address, physical address, telephone number, location information, tax information, banking details, online identifier or information, opinions, views or preferences; <p>If you make use of any of our products and/or services:</p> <ul style="list-style-type: none"> We collect your consent, communications and other information you provide when you interact with us or if you make use of our products and/or services, whether in person or electronically, whether through a formal written agreement or whether by means of a purchase order, quotation, invoice or otherwise; We track the number of orders, encounters, sales or interactions we have with you for our and your business interest. Such as the number of times you make use of our products and/or services; the reasons for which you make use of our products and/or services; the types of products and services you view or engage with; the features of the products and services you use; the actions you take; our employees you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our products and/or services, and what reviews you make or views you may have in regard to our products and services. We also collect information about how you use certain features of our products and/or services. We also track the number and regularity of payments to and of our accounts.
<p>Existing and former employees (including</p>	<p>Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health,</p>

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<p>contractors, agents, temporary and casual employees</p>	<p>well-being, disability, religion, conscience, belief, culture, language and birth date; information relating to the education, qualifications, gender or the medical, financial, tax information, banking details, criminal or employment history of the person, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier; name, surname, identification number, biometric information, opinions, views or preferences;</p>
<p>Directors / shareholders</p>	<p>If you are an individual:</p> <ul style="list-style-type: none"> • information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth date; information relating to the education or the medical, financial, tax information, banking details, criminal or employment history of the person, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier; name, surname, identification number, biometric information, opinions, views or preferences; <p>If you are a company, trust, closed corporation, or other legal entity:</p> <ul style="list-style-type: none"> • Name, registration number, symbol, e-mail address, physical address, telephone number, location information, tax information, banking details, online identifier or information, opinions, views or preferences; <p>If you make use of any of our products and/or services:</p> <ul style="list-style-type: none"> • We collect your consent, communications and other information you provide when you interact with us or if you make use of our products and/or services, whether in person or electronically, whether through a formal written agreement or whether by means of a purchase order, quotation, invoice or otherwise; • We track the number of orders, encounters, sales or interactions we have with you for our and your business interest. Such as the number of times you make use of our products and/or services; the reasons for which you make use of our products and/or services; the types of products and services you view or engage with; the features of the products and services you use; the actions you take; our employees you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our products and/or services, and what reviews you make or views you may have in regard to our products and services. We also collect information about how you use certain features

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	<p>of our products and/or services. We also track the number and regularity of payments to and of our accounts.</p>
Job applicants	<p>Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth date; information relating to the education, qualifications, gender or the medical, financial, tax information, banking details, criminal or employment history of the person, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier; name, surname, identification number, biometric information, opinions, views or preferences.</p>
Visitors to Private Body's premises'	<p>Name, contact number, physical, postal and email address, contact number, identity number, COVID Protocol health information, biometric information.</p>
Visitors / Users of the Private Body's website(s)	<p>Passwords and Login Information: For use of our website(s), we may require you to register your Personal Information with us via e-mail or via website(s), or as may be otherwise communicated to you from time to time. If you register your Personal Information, you will be able to create your own user name and password. You must not provide your username or password to anyone. You are solely responsible for keeping your username or password secret. You are solely responsible for any loss you may suffer should any other person use your username or password;</p> <p>We collect the consent, communications and other information you provide when you interact with us or when making use of our products and/or services, including when you sign up for an account, create or share content, and message or communicate with us via our website(s) as stated above. Our systems automatically process content and communications you and others provide to analyse context and what's in them for the purposes described below. We specifically process your name and identity number, e-mail and physical addresses, postal address, contact information, information relating to your race, gender, and age, and such other information regarding yourself and/or your views if you choose to share same via our website(s);</p> <p>Your usage. We collect information about how you interact with us or when making use of our products and/or services and/or our website(s), such as the number of times you make use of our products and/or services or our website(s); the reasons for which you make use of our products and/or services or our website(s); the types of content you view or engage with; the features you use; the actions you take; the accounts you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our products and/or services and/or our website(s), and what posts, pages and other content you view on our website(s). We also collect information about</p>

	<p>how you use certain features of our products and/or services and/or our website(s);</p> <p>Device Information. As described below, we collect information from and about the computers, phones, connected TVs and other web-connected devices you use that integrate with our website(s), and we combine this information across different devices you use. For example, we use information collected about your interaction and/or use of our products and/or services and/or our website(s) on your phone to better personalize the content (including ads) or features you see when you interact with us or use our products and/or services on another device, such as your laptop or tablet, or to measure whether you took an action in response to an advertisement we showed you on your device. Information we may obtain from these devices include:</p> <ul style="list-style-type: none">• Device attributes: information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.• Device operations: information about operations and behaviours performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).• Identifiers: unique identifiers, device IDs, and other identifiers, such as from services, apps, pages or accounts you use, or other identifiers unique to us or our products and/or services associated with the same device or account.• Device signals: Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers.• Data from device settings: information you allow us to receive through device settings you turn on, such as access to your GPS location, camera or photos.• Network and connections: information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, and connection speed and, in some cases, information about other devices that are nearby or on your network, so we can do things like help you stream content to or through all your devices.• Cookie data: data from cookies stored on your device, including cookie IDs and settings.
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	<ul style="list-style-type: none"> • Information from partners: advertisers, site developers, and publishers can send us information through, including our social plug-ins, such as our APIs. These partners provide information about your activities on our website(s), including information about your device, websites you visit, purchases you make, the advertisements you see, and how you use their services. Whether or not you have an account with us or are logged into our website(s). For example, a partner could use our API to tell us what pages you viewed, or a business could tell us about a purchase you made in its store. We also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information. • 3rd party links: partners receive your data when you visit or use their services or through third parties they work with. We require each of these partners to have lawful rights to collect, use and share your data before providing any data to us.
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9.3. **The recipients or categories to whom the Personal Information may be supplied (section 51(1)(c)(iii) of the PAIA):**

Category of Personal Information	Recipients or categories of recipients to whom the Personal Information may be supplied
Name Contact details Compensation & benefits package	Regulatory, statutory and government bodies applicable to the Private Body's business affairs, including but not limited to: <ul style="list-style-type: none"> • The South African Revenue Service • South African Qualifications Authority • The South African Police Services • The Department of Labour
Name and contact details Registration number Physical address Bank details BBBE information Signature Credit Limit Financial History	Suppliers, independent contractors, service providers, vendors, agents and representatives of the Private Body ;
Full Name Contact Details Compensation & Benefits Dependant details Employment History	Employees of the Private Body
Full Name Contact Details	Shareholders and other stakeholders of the Private Body;

Compensation & Benefits Dependant details Employment History	
Name Contact details Bank Details Financial standing Financial History	Third party verification agencies and credit bureaus;
Identification numbers Name Contact details Dependants' information	Medical aid scheme providers and pension funds
None	Collection agencies;
Name Contact details Compensation & Benefits package	Banks and other financial institutions
Name Email address	Global Cloud services systems as SAP, Salesforce, Concur

9.4. Planned or prospective trans-border flow of Personal Information (section 51(1)(c)(iv) of the PAIA):

The Personal Information that we collect from you may be transferred to, and stored at, a destination outside the Republic. It may also be processed by staff operating outside the Republic who work for us or for one of our suppliers, contractors, content providers or service providers. Such staff or third parties may be engaged in, among other things, the fulfilment of our obligations towards you, the processing of your payment details and the provision of support products and/or services. We will take all steps reasonably necessary to ensure that the information is treated securely and in accordance with the law and our privacy policy, and that said destination's data protection legislation is similar to POPIA, and if such destination's data protection legislation is not similar to POPIA, then we shall only transfer your personal information with your consent, the Information Regulator's prior authorisation, or if we are required by law to do so, or under an agreement with the relevant recipient in such destination whereby we ensure that adequate safeguards are put in place to ensure the protection of your Personal Information.

9.5. General description of information security measures implemented or to be implemented by the Private Body to ensure the confidentiality, integrity and availability of the Personal Information of information (section 51(1)(c)(v) of the PAIA):

- 9.5.1 The Private Body continuously establishes and maintains appropriate reasonable, technical and organisational measures to ensure that the integrity of Personal Information in its possession or under its control is secure and that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access by having regard to the requirements set forth in law, in industry practise and generally accepted

information security practices and procedures which apply to the Private Body. However, we do not guarantee that your personal information shall be 100% (one hundred percent) secure.

- 9.5.2 Where there are reasonable grounds to believe that your Personal Information has been accessed or acquired by any unauthorised person, we will notify you and if required, also the Information Regulator appointed in terms of POPIA.
- 9.5.3 We will delay notifying you of the unauthorised access or acquisition of your Personal Information if a public body responsible for detection, prevention or investigation of offences or the Information Regulator informs us that notifying you will impede a criminal investigation or if such notification on our end would constitute a breach of any applicable law.
- 9.5.4 When we notify you of the compromise to the security of your Personal Information, we will to the best of our capabilities provide you with sufficient information to allow you to take protective measures against the potential consequences of the compromise.
- 9.5.5 Forms prescribed for the exercise of a right provided for in the POPIA:
- 9.5.5.1 Any right which may be afforded to a Data Subject, responsible party or third party under the POPIA or otherwise more fully explained in our privacy policy available on our website may be exercised, subject to applicable law, in accordance with POPIA's prescribed Forms:
- 9.5.5.2 An objection to the processing of Personal Information in terms of section 11 of POPIA can be lodged to the Information Officer by using prescribed POPIA Form 1;
- 9.5.5.3 A request for correction or deletion of Personal Information or destroying or deletion of record of Personal Information in terms of section 24 (1) of the POPIA may be lodged to the Information Officer using prescribed POPIA Form 2;
- 9.5.5.4 An application for the consent of a Data Subject for the Processing of Personal Information for the purpose of direct marketing in terms of section 69 (2) of the POPIA may be made by the Private Body, as the responsible party, from time to time using prescribed POPIA Form 4;
- 9.5.5.5 A complaint regarding interference with the protection of Personal Information / complaint regarding determination of an adjudicator in terms of section 74 of the POPIA may be exercised by using prescribed POPIA Form 5.

10. Updating of the PAIA Manual

The Head of the Private Body will on a regular basis update this PAIA Manual. The updated version shall be made available on the website of the Private body, at our registered place of business and on request.

Issued by:

DocuSigned by:

Cesar Nieto

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Mr. César Nieto

Information Officer

Schedules

Schedule 1: Private Body Information	
Registered name of Private Body	Boehringer Ingelheim (Pty) Ltd
Registration Number / Identity Number	1966/008619/07
Type of Private Body	Private Company
Private Body website(s)	https://www.boehringer-ingelheim.co.za
Registered Address:	BUILDING 4 SECOND FLOOR WATERFALL CORPORATE CAMPUS 74 WATERFALL DRIVE MIDRAND GAUTENG 1685
Postal Address:	PRIVATE BAG X3032 RANDBURG JOHANNESBURG GAUTENG 2125
Contact number(s):	+27 11 348 2400
Email address:	Cesar.nieto@boehringer-ingelheim.com
Fax:	NA
The Head	César Nieto
Information Officer	<ul style="list-style-type: none"> • Name: Mr. César Nieto • Tel: +27 11 348 2400 • Email address: Cesar.nieto@boehringer-ingelheim.com • Fax number: NA
Deputy Information Officer(s)	<ul style="list-style-type: none"> • Name: Christo Le Grange • Tel: +27 11 348 2400 • Email address: Christo.le_grange@boehringer-ingelheim.com • Fax number: NA
Access to information general contacts	<ul style="list-style-type: none"> • Email: metadataprotection.ae@boehringer-ingelheim.com

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Schedule 2 – categories of records of the Private Body which are available without a person having to request access		
Category of Record	Available on the Website	Available on request
Information freely available on the Private Body's website(s)	x	
A Data Subject requesting his/her/its own Personal Information under section 23 of POPIA		x
Documentation and information relating to the Private Body which is held by the Companies and Intellectual Property Commission (CIPC) and which is accessible to the public on request in accordance with section 25 of the Companies Act 71 of 2008, as amended		x
Product and promotional brochures of the Private Body	x	x

Schedule 3 – description of the records of the Private Body which are available in accordance with any other legislation	
Category of Records	Applicable legislation
Memorandum of Incorporation Securities Register Directors Register	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Data Subject's requesting their own Personal Information	Protection of Personal Information Act 4 of 2013
Tax Records	Income Tax Act 95 of 1967
Employee Records Employment Contracts Employment Equity Plan Payroll Records Employee Policies and Procedures	Basic Conditions of Employment Act 75 of 1997, Employment Equity Act 55 of 1995, Occupational Health and Safety Act 85 of 1993, Labour Relations Act 66 of 1995, Financial Intelligence Centre Act 38 of 2001, Private Body records

Schedule 4: description of the subjects on which the Private Body holds records and the categories of records held on each subject	
Subjects on which the body holds records	Categories of records
Corporate Affairs and Investor Relations / Communications	<ul style="list-style-type: none"> • Media releases • Newsletters and publications • Corporate social investment • Public corporate records
Corporate Secretariat and Governance	<ul style="list-style-type: none"> • Applicable Statutory Documents • Annual Reports • Board of Directors • Codes of Conduct

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	<ul style="list-style-type: none"> • Executive Committee Meeting Minutes • Legal Compliance Records • Memoranda of Incorporation • Minutes of Board of Directors • Minutes of Shareholders' Meetings • Policies and Procedures • Share Certificates • Shareholder Agreements • Share Registers • Strategic plans • Statutory Returns to Relevant Authorities
Finance and Taxation	<ul style="list-style-type: none"> • Policies and Procedures • Accounting Records • Annual Financial Statements • Audit Reports • Capital Expenditure Records • Investment Records • Invoices and Statements • Management Reports • Purchasing Records • Sale and Supply Records • Tax Records and Returns • Treasury Dealing • Transactional Records
Humans and Resources	<ul style="list-style-type: none"> • Education and Training Records • Employee Benefit Records • Employment Contracts • Employment Equity Records • Employee Information • Employee Share Option Scheme • Policies and Procedures • Leave Records • Medical Records • Pension and Retirement Funding Records • Study assistance scheme/s • Tax Returns of employees • UIF Returns
Information Technology	<ul style="list-style-type: none"> • Agreements • Disaster Recovery • Hardware and Software Packages • Policies and Procedures • Internal Systems Support and Programming

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	<ul style="list-style-type: none"> • Licenses • Operating Systems
Intellectual Property	<ul style="list-style-type: none"> • Trademark applications • Agreements relating to intellectual property • Copyrights • Patents • Designs
Legal	<ul style="list-style-type: none"> • Complaints, pleadings, briefs and other documents pertaining to any contractual or pending litigation, arbitration or investigation • Material licenses, permits and authorizations
Sales, Marketing and Communication	<ul style="list-style-type: none"> • Brochures, Newsletters and Advertising Material • Client Information • Marketing Brochures • Marketing Strategies • Product Brochures • Policies and Procedures