

PAIA Manual

Manual in Terms of Section 51 of the Promotion of Access to Information Act 2 of 2000

INNOVATA PHARMACEUTICALS (PTY) LTD

Registration Number: 2013/093943/07 | Version 1.6 | Final -23 July 2026

1. Introduction and Purpose

This manual ("Manual") is prepared and published in compliance with section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and incorporates the disclosure requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA").

PAIA gives effect to section 32 of the Constitution of the Republic of South Africa, 1996, which provides for the right of access to information held by the State and by private bodies, where such information is required for the exercise or protection of any right. POPIA regulates the processing, collection, and storage of personal information and establishes the rights of data subjects in relation to personal information held about them by responsible parties.

This Manual is available free of charge at the registered office of Innovata Pharmaceuticals (Pty) Ltd, on the Company website at <https://innovata.co.za/legal>, and from the office of the Information Regulator upon request. A copy may be obtained on request subject to the prescribed fees.

2. Details of the Company

Full legal name	Innovata Pharmaceuticals (Pty) Ltd
Registration number	2013/093943/07
VAT number	4420189369
Business address	100 Northern Parkway Road, Crownwood Office Park, Block D, Ground Floor, Ormonde, City of Johannesburg, Gauteng, 2001, South Africa
Telephone	+27 86 999 0912
Website	https://innovata.co.za
Information Officer	Grace Job
IO email	popia@innovata.co.za
Deputy Information Officer	Hadiyo Mathoka
General enquiries / PAIA requests	popia@innovata.co.za

All PAIA access requests and POPIA-related enquiries must be directed to the Information Officer at the contact details above. Where the Information Officer is unavailable, requests may be directed to the Deputy Information Officer.

3. Contact Details of the Information Regulator

The Information Regulator is an independent institution established under POPIA to promote and enforce PAIA and POPIA. Its contact details are as follows:

Name	The Information Regulator (South Africa)
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: grace@innovata.co.za

www.innovata.co.za

Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Website	https://info regulator.org.za
Email enquiries	enquiries@info regulator.org.za
PAIA requests	PAIAComplaints@info regulator.org.za
POPIA complaints	POPIAComplaints@info regulator.org.za

The Information Regulator has published a guide on how to use PAIA as contemplated in section 10 of PAIA. This guide is available from the Information Regulator at the contact details above.

For matters concerning the safety, quality, or registration status of a medicine, the South African Health Products Regulatory Authority (“SAHPRA”) is the relevant sector regulator and may also be contacted directly.

4. Records Available Without a PAIA Request

Certain records or categories of information are made available by Innovata Pharmaceuticals (Pty) Ltd without the need for a formal PAIA request. These include:

- This PAIA manual, available on the Company website and at the registered office.
- The Company's Privacy and Data Protection Policy, available at <https://innovata.co.za/legal>.
- The Company's website terms and conditions and legal disclaimer, available at <https://innovata.co.za/legal>.
- Approved patient and healthcare professional product information, where published on the Website.
- General marketing materials and corporate information published on the Company website.
- Company registration details as published by the Companies and Intellectual Property Commission (CIPC).

All other records must be requested formally in terms of the procedure set out in Section 7 of this Manual.

5. Categories of Records Held by the Company

Innovata Pharmaceuticals (Pty) Ltd holds records across the following categories in the course of its operations as a pharmaceutical manufacturer and distributor. Access to these records is subject to the provisions of PAIA and must be requested formally in terms of Section 7 of this Manual.

Corporate governance and statutory records

- Memorandum of Incorporation and shareholder records
- Board resolutions and directors' written resolutions
- Share register and share certificates
- CIPC statutory filings and returns
- Company policies and governance frameworks, including the IT Master Policy

Regulatory, quality, and pharmacovigilance records

- SAHPRA product registration dossiers and regulatory correspondence
- Manufacturing and quality (GMP) records, batch records, and certificates of analysis
- Pharmacovigilance case files and adverse event records
- Product complaint and recall records
- Regulatory submissions prepared and lodged via the Company's regulatory submissions platform

Financial and accounting records

Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: grace@innovata.co.za

www.innovata.co.za

- Annual financial statements and management accounts
- Invoices, quotes, and purchase orders
- Banking records and payment records
- Tax records, VAT returns, and SARS correspondence

Human resources and employment records

- Employment contracts and contractor agreements
- Employee personal information and identity records
- Payroll and remuneration records
- Leave, attendance, disciplinary, and training records

Commercial and distribution records

- Distributor, pharmacy, and hospital supply agreements
- Healthcare professional engagement and medical information records
- Marketing and promotional material approvals
- Sales and supply records

Supplier and vendor records

- Contract manufacturer, active ingredient, and packaging supplier agreements
- Logistics and distribution partner agreements
- General supplier and vendor contracts and correspondence

Information technology and security records

- IT system architecture and configuration documentation
- Software licensing and asset records
- Information security policies and incident records
- Data processing and sub-processor records

Legal and compliance records

- Legal correspondence and advice
- Insurance policies
- POPIA compliance register and processing records
- PAIA requests and response records
- Data breach notification records

6. Records Available Under Other Legislation

The Company retains records in compliance with the following legislation applicable to its operations. The availability of these records is subject to the provisions of the relevant act and to PAIA.

- Medicines and Related Substances Control Act 101 of 1965
- National Health Act 61 of 2003
- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002

Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: grace@innovata.co.za

www.innovata.co.za

- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act 4 of 2013
- Value Added Tax Act 89 of 1991

7. Procedure for Requesting Access to Records

7.1 Who may request access

Any person may submit a request for access to a record held by Innovata Pharmaceuticals (Pty) Ltd in terms of PAIA. A person who is requesting information about themselves as a data subject under POPIA may also submit a data subject access request using the same procedure.

7.2 How to submit a request

- Complete Form 2 (Request for Access to Record of Private Body), included as Annexure A to this Manual.
- Submit the completed form by email to popia@innovata.co.za, marked for the attention of the Information Officer.
- Attach a certified copy of your identity document (South African ID, passport, or other acceptable proof of identity).
- If requesting on behalf of another person or a juristic person, attach proof of your authority to act in that capacity.

7.3 Fees

Fee	Amount
Request fee	R140.00 (payable on submission; not applicable where the requester seeks personal information about themselves)
Access fee	Payable if the request is granted; amount depends on the form of access and time required to locate and prepare the record
Deposit	A deposit of up to one-third of the access fee may be required where the search and preparation time exceeds six hours
Exemption	A requester may apply for exemption from fees if they can demonstrate that payment would cause substantial hardship

7.4 Response timeline

The Company will respond to a compliant PAIA request within 30 calendar days of receipt. This period may be extended by a further 30 days in exceptional circumstances, in which case the requester will be notified before the original deadline expires.

7.5 Form of access

The requester may specify the preferred form of access (copy, inspection, electronic record, etc.). The Company will endeavour to provide access in the requested form, subject to availability and to PAIA.

8. Grounds for Refusal of Access

Access to a record may be refused on the following grounds, as contemplated in PAIA:

Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: grace@innovata.co.za

www.innovata.co.za

- Mandatory protection of the privacy of a third party who is a natural person, where disclosure would constitute an unreasonable invasion of that person's privacy - including patients and healthcare professionals identifiable from pharmacovigilance or medical information records.
- Protection of commercial information of a third party, including trade secrets, formulation, and confidential financial or business information.
- Protection of confidential information supplied by a third party.
- Protection of safety of individuals.
- Protection of records privileged from production in legal proceedings.
- Records that would prejudice a third party's commercial competition.
- Records relating to research by a third party.
- Records whose disclosure would constitute an offence.
- Records whose disclosure would result in the unlawful processing of personal information as contemplated in POPIA.

The Company will notify the requester in writing of any refusal, the grounds for refusal, and the right to seek internal appeal or external review.

9. Remedies Available to a Requester

9.1 Internal appeal

A requester may submit a written internal appeal to the Information Officer within 60 days of receiving the Company's decision.

9.2 Application to the Information Regulator

A requester may apply to the Information Regulator for a review of the Company's decision in terms of section 56 of PAIA, within 180 days of receipt of the decision or the deemed refusal.

9.3 Application to the High Court

In terms of section 82 of PAIA, a requester or third party may apply to the High Court for relief in respect of a decision made by the Company, after exhausting the Information Regulator review process.

9.4 POPIA complaints

A data subject who believes that the Company has processed their personal information in contravention of POPIA may submit a complaint to the Information Regulator at POPIAComplaints@inforegulator.org.za.

10. Processing of Personal Information (POPIA)

Innovata Pharmaceuticals (Pty) Ltd is a responsible party as defined in POPIA in respect of personal information it processes in connection with its operations, including personal information relating to employees, healthcare professionals, patients (via pharmacovigilance and medical information activities), clients, and website visitors. Full detail on the categories of personal information processed, the purposes and lawful basis for processing, retention periods, and data subject rights is set out in the Company's Privacy and Data Protection Policy (Annexure C), which forms part of this disclosure for the purposes of section 51 of PAIA.

11. Data Subject Rights

Data subjects whose personal information is processed by the Company have the following rights under POPIA:

- Right to be notified at the time of collection that personal information is being collected and for what purpose (POPIA s18).

Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax2email: +27 (0) 86 585 5115 | email: grace@innovata.co.za

www.innovata.co.za

- Right of access to request confirmation of whether the Company holds personal information about the data subject, and to request a description of that information (POPIA s23).
- Right to correction or deletion to request that inaccurate, irrelevant, excessive, outdated, incomplete, misleading, or unlawfully obtained personal information be corrected or deleted (POPIA s24).
- Right to object to the processing of personal information, including for the purpose of direct marketing (POPIA ss11(3) and 69).
- Right to complain to the Information Regulator if the data subject believes the Company has processed their personal information in contravention of POPIA (POPIA s74).

To exercise any of the above rights, data subjects must submit a written request to the Information Officer at popia@innovata.co.za. The Company will respond within 30 calendar days.

12. Amendment of This Manual

This Manual will be reviewed and updated at least annually, or whenever a material change occurs that affects the accuracy of its contents. The current version is always available on the Company website. This Manual was first published in July 2026 and constitutes Version 1.6

Innovata Pharmaceuticals (Pty) Ltd

Crownwood Office Park, 100 Northern Parkway, Ormonde, 2091 Johannesburg, South Africa

Tel: +27 (0) 86 999 0912 | fax/email: +27 (0) 86 585 5115 | email: grace@innovata.co.za

www.innovata.co.za