

NOVO NORDISK (PTY) LTD

REGISTRATION NUMBER: 1959/000833/07

**MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION
OF ACCESS TO INFORMATION ACT 2 OF 2000**

**COMPILED: January 2018
UPDATED: 09 January 2023**

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1. PURPOSE OF THE MANUAL

The aim of PAIA, is to foster a culture of transparency and accountability in public and private bodies. It does that by giving effect to the right of access to information and actively promoting a society in which the people of South Africa have effective access to information to enable them to fully exercise and protect all of their rights and also to realise South Africa's goals of an open and participatory democracy.¹

The purpose of this Manual is to assist people who wish to access information from Novo Nordisk Proprietary Limited ("Novo Nordisk") using PAIA. This Manual is also user-friendly manual for any person who wishes to exercise their data subject rights contemplated in PAIA and the Protection of Personal Information Act, 2013 ("POPIA").

For purposes of this Manual, we refer to ourselves as "Novo Nordisk", "we", "us" or "our".

2. NOVO NORDISK'S BACKGROUND

Novo Nordisk is a limited liability company registered as such in terms of the Company laws of South Africa. We are a pharmaceutical company and our core activities relate to the sale, marketing, research and development of our pharmaceutical products (specifically for treatment in the following areas: diabetes, hormone replacement therapy, and growth hormone). Novo Nordisk products are for sale primarily in the prescription market.

Novo Nordisk's South African head office is in Sandton, Johannesburg, South Africa.

3. CONTACT DETAILS

Registration Number	1959/000833/07
Physical Address	150 Rivonia Road Building C1 10 Marion Street Office Park Sandton 2196
Postal Address	P.O Box 783155 Sandton 2146
Telephone number	011 202 0500
Head of Body	Sara Norcross Tel: 011 202 0500 Email: legalza@novonordisk.com
Information Officer	Sara Norcross Tel: 011 202 0500 Email: legalza@novonordisk.com
Deputy Information Officer	Nomvuyo Twala Tel: 011 202 0500 Email: legalza@novonordisk.com

¹ Extract from the Section 10 PAIA Guide.

4. WHERE TO GET GUIDANCE REGARDING SUBMITTING A PAIA REQUEST

The process of submitting a PAIA request can be daunting. If you are not familiar with PAIA, a guide, containing information to assist you in understanding how to exercise your rights under PAIA, has been prepared (“**the Guide**”).

The Guide is available in all the official languages of South Africa, including braille², upon request to the Information Officer and from the website of the Regulator.

You can inspect or make copies of the Guide at our offices or the office of the Regulator, during normal working hours. A copy of the Guide is available in English and Setswana, for public inspection during normal office hours at our offices. To save you the inconvenience of attending at our offices, you can also access the Guide on the Information Regulator’s website by clicking on [this link](#).

The contact details of the Regulator are:

Postal Address:	JD House, 27 Stiemens Street, Braamfontein, Braamfontein, Johannesburg, 2001
Telephone Number:	010 023 5200
Email:	paia.compliance@info regulator.org.za
Website:	https://info regulator.org.za/

5. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

We are subject to various laws and regulations, some of which require us to keep certain records. We have set out, below, laws that we may be subject to, and which may require us to keep certain records.

No.	Ref	Act
1	58 of 1962	Income Tax Act
2	89 of 1991	Value Added Tax Act
3	34 of 2005	National Credit Act
4	23 of 1996	Currency and Exchanges Amendment Act
5	91 of 1964	Customs and Excise Act (as amended)
6	57 of 1978	Patents Act
7	24 of 1956	Pension Funds Act

² The version in braille is only available at the Office of the Regulator.

8	4 of 2000	Promotion of Equality and Prevention of Unfair Discrimination Act
9	5 of 2000	Preferential Procurement Policy Framework Act
10	12 of 2004	Prevention and Combating of Corrupt Activities Act
11	109 of 1985	Regional Services Councils Act
12	89 of 1998	Competition Act
13	61 of 1973	(Companies Act)
14	71 of 2008	Companies Act
15	98 of 1978	Copyright Act
16	25 of 2002	Electronic Communications and Transactions Act
17	78 of 1957	Export Credit and Foreign Investments Insurance Act
18	80 of 1995	Sale and Service Matters Amendment Act
19	75 of 1997	Basic Conditions of Employment Act
20	66 of 1995	Labour Relations Act
21	181 of 1993	Occupational Health and Safety Act
22	36 of 2004	Securities Services Act
23	97 of 1998	Skills Development Act
24	9 of 1999	Skills Development Levies Act
25	194 of 1993	Trade Marks Act
26	63 of 2001	Unemployment Insurance Act
27	4 of 2002	Unemployment Insurance Contributions Act
30	130 of 1993	Compensation for Occupational Injuries and Diseases Act
31	Act 55 of 1998	Employment Equity Act
32	Act 53 of 2003	Broad Based Economic Empowerment
33	20 of 2013	Basic Conditions of Employment Amendment Act
34	61 of 1997	Compensation for Occupational Injuries and Diseases Amendment Act
35	47 of 2013	Employment Equity Amendment Act

36	55 of 1998	Employment Equity Act-Code of Good Practice on HIV & AIDS and the World of Work
37	24 of 1936	Insolvency Act
38	6 of 2014	Labour Relations Amendment Act
39	181 of 1993	Occupational Health and Safety Amendment Act
40	4 of 2014	Employment Services Act
41	31 of 2003	Skills Development Amendment Act
42	131 of 1998	Medical Schemes Act
43	101 of 1965	Medicines and Related Substances Act
44	68 of 2008	Consumer Protection Act
45	53 of 1974	Pharmacy Act
46	November 2016 As amended	The SA Code of Practice for the Marketing of Health Products
47	February 2015 As amended	Guidelines to Code of Marketing Practice
48	4 of 2013	Protection of Personal Information Act

We have used our best endeavours to provide a list of applicable legislation. However please note that the above list may not be exhaustive. In the event where existing or new legislation allows a requester access on a basis other than as set out in PAIA, we will update the list accordingly. If you believe that a right of access to a record exists in terms of other legislation listed above or any other legislation, you are required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity to consider the request in light thereof.

6. SCHEDULE OF RECORDS

6.1. Automatically Available Records

These are records that are readily available without having to complete Form C (Annexure 1) on the basis that they do not contain sensitive information or information that we are legally prohibited from disseminating. Some of the records are available on and can be obtained from the website. Alternatively, you may request them telephonically or by sending an email or a letter.

Category	Document Type	Availability
PAIA Manual	Manual	Available on website

Operational/Policies/Plans/Procedures/Framework	Health and safety, procurement, business ethics, donations, travel	Available on request
Publicity and Marketing Material	Publications and reports	Available on website
Publications	Books, booklets etc.	Available on website or on request
Media	Press releases, radio & tv interviews, statements, official speeches and messages, gifts & awards	Available on website or on request
Events, Functions and Seminars, conferences	Certain presentations, discussions, documents	Available on website or on request

6.2. Records Not Automatically Available

PAIA requires us to make access to our records easier. To do so, we have described below the categories on which we hold records.

The records listed below are not automatically available and must be requested by lodging a request form in terms of Annexure 1. Access to parts of or a whole record may be refused in accordance with the applicable laws/legal grounds.

Category
Strategic documents, plans, proposals
Operational/policies/plans/procedures/framework
Financials
Publicity and marketing material
Research & development information
Sales
HR documents
Reports, minutes, decisions
Supply chain documents
Audio visual recordings
Executive management internal sensitive communication
Security related information
Records held by the Legal Services Department
Research conducted by service providers For the organisation or programs subject to contractual exemptions on disclosure
Confidential client communications to programs
Privileged information: held in the course of closed hearings, attorney client information, national security-based information, third party information;

Specific human resource personnel information, including files relating to discipline, medical information etc
Asset disclosures and asset protection procedures
Certain tender documentation
Agendas and minutes of meetings and correspondence
Draft reports, policies and discussions documents

7. REQUESTING PROCEDURE

If you would like to make a PAIA request, you may do so on the request Form C of Annexure B to Government Notice No. R.187 dated 15 February 2002 or on a substantially similar form. We have, for your convenience, attached the form to this Manual. It is attached as Annexure 1.

It is important that you address any requests for access to records to the Information Officer at the address, or e-mail address provided above. It is important that you provide us with sufficient detail on the request form to enable us to identify you and the record you need from us. You must also indicate in what form you would like to access the records, for example hardcopy printouts or electronic format. Please also let us know whether, in addition to a written response, you would like us to contact you in some other way, for example by telephone or email. If so, please provide us with your additional contact details.

It is vital that you identify the right that you want to exercise or protect and provide us with an explanation of why the requested record is required for the exercise or protection of that right.

If you are making a request on behalf of another person, you must submit proof of the capacity and/or authority upon which you make the request. This proof will be subject to the satisfaction of the Information Officer.

If you do not use the standard form (in Annexure 1 to this Manual), your request may be rejected for lack of procedural compliance, refused (if sufficient information is not provided or otherwise) or delayed.

Please note that you will also be required to pay the prescribed fees. The list of prescribed fees for requests, and for access to records (if the request is granted) is set out in Annexure 2 to this Manual

If you are requesting records that are not related to a personal request, we will first notify you of the prescribed fee (if any) before processing the request any further. You may lodge an internal appeal or an application to Court, against our requirement that you pay a request fee.

We will then make a decision on the request and notify you in the required way.

If your request is granted, then a further access fee must be paid for the reproduction and search and preparation of the record, and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

Please note that we will evaluate and consider all requests which we receive in accordance with PAIA. It is important to remember that, even though we have published this Manual and described the categories and subject matter of information or records that we hold,

this does not give you any rights to access such information or records, except in terms of PAIA. Records that you may not be entitled to include those of third parties who are natural persons (i.e. humans), the commercial information of third parties, the safety of individuals or protection of property, those that are privileged from production or publication in terms of legal proceedings, the commercial information of a private body and research information of a third party and a private body.

8. PROCESSING OF PERSONAL INFORMATION

POPIA requires us to provide you with certain information relating to how personal information that we process is, amongst others, used, disclosed and secured. We have set out the required information below.

8.1. Information on Request made under POPIA

POPIA provides that you may, upon proof of identity, request us to confirm, free of charge, whether or not we hold any personal information about you. You may also request the record or description of the personal information about you, including information about the identity of third parties who have or have had access to such information.

Requests for personal information under POPIA must be made in accordance with the provisions of PAIA. This process is outlined in paragraph 7 above. We will give you a written estimate of the fee for providing you with your personal information, before providing you with the service. We may also require you to provide us with a deposit for all or part of the fee prior to giving you the requested personal information.

You have the right to request correction, and under certain circumstances, deletion or destruction of your personal information, in the prescribed form. If you wish to request correction, deletion or destruction of personal information, you must submit a request to the Information Officer at the address above on the form attached as Annexure 3.

Under certain circumstances, you may also object to the processing of your personal information on reasonable grounds relating to your situation in the prescribed form. If you wish to object, you must complete the prescribed form attached as Annexure 4 and submit it to the Information Officer at the address above.

8.2. Purpose of Processing Personal Information

POPIA provides that personal information must be processed for a specified purpose.

The purpose for which information is processed will depend on the type of personal information that we collect and our relationship with you as a data subject. The purpose for which your information is processed is ordinarily disclosed, explicitly at the time of collection. Please also refer to Novo Nordisk's Privacy Policy for further information. [privacy-policy-legal-disclaimer-south-africa.pdf](https://www.novonordisk.za.com/privacy-policy-legal-disclaimer-south-africa.pdf) (novonordisk.za.com)

8.3. Description of the Categories of Data Subjects and of the Information or Categories of Information Relating thereto

Category of Data Subject	Category of Personal Information
Natural persons	Names; contact details; physical and postal addresses; date of birth; age ID number; tax related information; nationality; gender; banking details; personal views and opinions; and confidential correspondence.
Juristic persons / entities. Contracted service providers, intermediary / advisor, foreign persons / entities	Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; date of birth; passport number tax related information; nationality; gender; confidential correspondence; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.
Employees / directors / potential personnel / shareholders / volunteers / employees' family members / temporary staff	Gender, pregnancy; marital status; race, age, language, education information; financial information; employment history; ID number; next of kin; children's name, gender, age; physical and postal address; contact details; opinions, criminal behaviour and/or criminal records; well-being; external

Category of Data Subject	Category of Personal Information
	commercial interests; medical information.
Website end-users / application end-users	Names, electronic identification data: IP address; log-in data, cookies, electronic localization data; cell phone details, GPS data.

8.4. The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

We may supply personal Information to these potential recipients:

- entities within the Novo Nordisk group of companies;
- management;
- employees;
- temporary staff;
- vendors; and
- sub-contracted operators.

We may disclose personal information we collected to any of our third-party service providers, with whom we engage in business or whose services or products we elect to use, including cloud services hosted in international jurisdictions.

We may disclose personal information with any regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities.

We endeavour to enter into written agreements to ensure that other parties comply with our confidentiality and privacy requirements. Personal information may also be disclosed where we have a legal duty or a legal right to do so.

8.5. General Description of Information Security Measures

Novo Nordisk employs appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information. These measures include:

- firewalls;
- virus protection software and update protocols;
- logical control; and
- secure setup of hardware and software making up our information technology infrastructure.

8.6. Actual or Planned Trans-Border Flows of Personal Information

We may disclose personal information we collected to our shareholders, any of our overseas subsidiaries, associate entities or third-party service providers, with whom we engage in business or whose services or products we elect to use, including cloud services hosted in international jurisdictions. These territories include:

- Norway
- EU Countries (GDPR Legislation)

We will only transfer personal information to a third party who is in a foreign country if the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection similar to POPIA or under the following circumstances:

- you consent to the transfer;
- the transfer is necessary for the performance of a contract between us, in response to your request; or
- the transfer is for your benefit, and it is not reasonably practicable to obtain the consent. If it were reasonably practicable to obtain such consent, you would be likely to give it.

9. AVAILABILITY OF THE MANUAL

This manual is available for inspection by the general public upon request during office hours and there is no charge for viewing the manual at our offices at Novo Nordisk. Copies of the manual may be made available subject to the prescribed fees.

The manual can also be downloaded from our website, <http://www.novonordisk.za.com/>

ANNEXURE 1
REQUEST FOR ACCESS TO A RECORD
NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

 E-mail address:

 Fax number:

Mark with an "X"

 Request is made in my own name
 another person.

Request is made on behalf of

PERSONAL INFORMATION			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
			Facsimile

Full names of person on whose behalf request is made (<i>if applicable</i>):	
Identity Number	
Postal Address	

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	

Any further particulars of record	
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images (<i>this includes photographs, slides, video recordings</i>)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of record on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of record on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS

(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages

Indicate which right is to be exercised or protected	

Explain why the	

aforementioned right:

FEES

- a) *A request fee must be paid before the request will be considered.*
- b) *You will be notified of the amount of the access fee to be paid.*
- c) *The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*
- d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption*

Reason:

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

		Electronic

Signed at _____ this _____ day of
20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

Annexure 2

FEES IN RESPECT OF PRIVATE BODIES IN TERMS OF PAIA

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: <ul style="list-style-type: none"> i. Flash drive (to be provided by requester) ii. Compact disc <ul style="list-style-type: none"> • If provided by requester • If provided to requester 	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: <ul style="list-style-type: none"> i. Flash drive (to be provided by requestor) ii. Compact disc <ul style="list-style-type: none"> • If provided by requester • If provided to requester 	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of:	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of item 2 to 8.
11.	Postage, email or any other electronic transfer	Actual expense, if any.

ANNEXURE 3

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 PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

- 1 *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
- 2 *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
- 3 *Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:

- Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.,/

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/	

Identity Number:	
Residential, postal or business address	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E- mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTRUCTED/ DESTROYED

D	<p>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a)</p> <p>WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or</p> <p>REASONS OR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL</p> <p>INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b)</p> <p>WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</p> <p><i>(Please provide detailed reasons for the request)</i></p>

Signed at this day of
.....20.....

.....

Signature of data subject/ designated person

ANNEXURE 4
**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN
TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL
INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**
**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2018**

[Regulation 2]

Note:

- 1 *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
- 2 *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
- 3 *Complete as is applicable.*

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY

Signed at this day of
.....20.....

.....

Signature of data subject/ designated person