

AstraZeneca PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

AstraZeneca	AstraZeneca Pharmaceuticals (Pty) Ltd
“CRO”	Contract Research Organization
“DIO”	Deputy Information Officer
“HCP”	Healthcare Professional
“HR”	Human Resources
“IO”	Information Officer
“IT”	Information Technology
“Minister”	Minister of Justice and Correctional Services
“PAIA”	Promotion of Access to Information Act No. 2 of 2000 as Amended
“POPIA”	Protection of Personal Information Act No.4 of 2013
“Regulator”	Information Regulator
“Republic”	Republic of South Africa
“SAHPRA”	South African Health Products Regulatory Authority
“SARS”	South African Revenue Service
“UIF”	Unemployment Insurance Fund
“VAT”	Value-Added Tax

1.1. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 1.1.1. Check the category of records held by AstraZeneca that are available without a person having to submit a formal PAIA request.
- 1.1.2. Understand how to request access to AstraZeneca's records, including the subjects and categories of records held.
- 1.1.3. Know the description of the records which are available in accordance with other legislation.
- 1.1.4. Access the contact details for the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- 1.1.5. Understand the guide on using PAIA and how to access it.
- 1.1.6. Know if and how AstraZeneca processes personal information, including the purpose, categories of data subjects, and recipients of the information.
- 1.1.7. Know whether AstraZeneca has planned to transfer or process personal information outside of South Africa and the appropriate security measures to ensure the confidentiality, integrity, and availability of the personal information.

1.2 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF ASTRAZENECA

1.2.1 Chief Information Officer

Name: Neel Andhee-Shah
Tel: +27 11 797 6000
Email: neel.andhee-shah@astrazeneca.com
Fax number: +27 86 640 1463

1.2.2 Deputy Information Officer

Name: Reshma Singh
Tel: +27 11 797 6000
Email: Reshma.Singh@astrazeneca.com
Fax Number: +27 86 640 1463

1.2.3 Access to information general contacts

Email: popia.sa@astrazeneca.com

1.2.4 Head Office

Contact Details	
Postal Address	Building 2, Northdown Office Park, 17 Georgian Crescent West, Bryanston, 2191
Physical Address	Building 2, Northdown Office Park, 17 Georgian Crescent West, Bryanston, 2191
Telephone	+27 (0) 11 797 6000
Email	zahelpdesk@astrazeneca.com
Website	https://www.astrazeneca.com/country-sites/african-cluster.html - !

1.3 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Regulator has in terms of section 10(1) of PAIA updated the revised Guide on how to use PAIA ("**Guide**"). This Guide is available in all official languages and braille. It includes:

- Objectives of PAIA and the POPIA
- Contact details for Information Officers and Deputy Information Officers for public and private bodies
- Instructions on how to request access to records.
- Available assistance from the IO and legal remedies.
- Information on how to compile and access manuals.

Members of the public can inspect or copy the Guide at public and private bodies' offices, request it from the Information Officer, or access it on the Regulator's website: <https://inforegulator.org.za/>

2. CATEGORIES OF RECORDS OF ASTRAZENECA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available on request
Corporate Information	Company profile, mission and values, executive leadership bios	x	
Product Information	Product brochures, package inserts, safety data sheets, and prescribing information	x	Request via email
Media Releases	Press statements, news updates, and public announcements	x	Request via email
Careers	Job vacancies, recruitment process, and application guidelines	x	
Privacy and Data Protection	POPIA and GDPR compliance statements, privacy notices	x	
PAIA Manual	Full PAIA Manual and related forms	x	
Annual Reports	Summaries of financial and operational performance (if published)		x

3. DESCRIPTION OF THE RECORDS OF ASTRAZENECA WHICH ARE AVAILABLE IN ACCORDANCE WITH LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
B-BBEE Certificates	Broad-Based Black Economic Empowerment Act 53 of 2003
Consumer Protection Documentation	Consumer Protection Act 68 of 2008
Cybercrimes	Cybercrimes Act 19 of 2020
Data Protection and Privacy Notices	Protection of Personal Information Act 4 of 2013 (POPIA)
Employment Equity Reports	Employment Equity Act 55 of 1998
Environmental Compliance Reports	National Environmental Management Act 107 of 1998
Financial Statements and Audit Reports	Companies Act 71 of 2008; Auditing Profession Act 26 of 2005
Medical Scheme Contributions	Medical Schemes Act 131 of 1998
Medicines and Product Registration	Medicines and Related Substances Act 101 of 1965
Occupational Health and Safety Records	Occupational Health and Safety Act 85 of 1993
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Pharmacy Practice Records	Pharmacy Act 53 of 1974
Skills Development Records	Skills Development Act 97 of 1998
Tax Records and PAYE Submissions	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011
UIF and Compensation Records	Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993
VAT Records	Value-Added Tax Act 89 of 1991

4. DESCRIPTION OF THE SUBJECTS AND CATEGORIES ON WHICH THE ASTRAZENECA HOLDS RECORDS

Subject	Category of records
Company Act Records	• All trust deeds • Documents of Incorporation • Index of names of Directors • Memorandum of Incorporation • Minutes of meetings of the Board of Directors • Minutes of meetings - Shareholder Forms • Register of debenture-holders • Register of Director shareholdings Share certificates • Special Resolutions/Resolutions passed at General and Class meetings • Records relating to the appointment of Auditors Directors • Prescribed Officer Public Officer and Seretary
Personnel Documents And. Records	• Accident books and records • Address Lists • Disciplinary Code and Records • Employee benefits arrangements rules and records • Employment Contracts • Employment Equity Plan Forms and Applications • Grievance Procedures Leave Records • Medical Aid Records • Payroll reports • Pension Fund Records • Safety, Health and Environmental records • Salary Records • SETA records • Standard letters and notices • Training Manuals • Training Records • Workplace and Union agreements and records.
Procurement Department	• Standard Terms and Conditions for supply of services and products • Contractor, client and supplier agreements • Lists of suppliers, products, services and distribution
Sales Department	• Information and records provided by a third party, HCP, HCO and Trade vendors
Risk Management and Audit	• Audit reports • Risk management frameworks • Risk management plans

Safety, Health and Environment	• Business Continuity • COVID 19 Risk Assessment • SHE Handbook • Vehicle Handbook • Accident Report Form • Vehicle Inspection Form • Vehicle Application Form • Insurance/Traffic Fine Consent Form • Incident Form • Workman's Compensation/COIDA Forms • Vehicle Collection Form • Netstar Form • Complete Safety, Health and Environment Risk Assessment • Environmental Managements Plans • Inquiries, inspections, examinations by environmental authorities
IT Department	• Computer / mobile device usage policy documentation • Disaster recovery plans • Hardware asset registers • Information technology systems and user manuals • Information usage policy documentation • Software licensing
Corporate Social Responsibility (CSR)	• CSR schedule of projects/record of organisations that receive funding • Reports, books, publications and general information related to CSR spend • Records and contracts of agreement with funded organisations.
Financial Records	• Accounting Records • Annual Financial Reports • Annual Financial Statements Asset Registers • Bank Statements • Banking details and bank accounts • Banking Records • Invoices • Rental Agreements • Tax Records
Income Tax Records	• PAYE Records • Documents issued to employees for income tax purposes • Records of payments made to SARS on behalf of employees • VAT • Regional Services Levies • Skills Development Levies • UIF • Workmen's Compensation

5. PROCESSING OF PERSONAL INFORMATION

5.1 Purpose of Processing Personal Information

AstraZeneca processes personal information for purposes including, but not limited to:

- **Research and Development:** Personal data, including health information, may be collected during clinical trials and studies to facilitate the development of new medicines, ensure their safety, and monitor effectiveness.
- **Patient Safety and Support (Pharmacovigilance):** Personal data are utilised by AstraZeneca to oversee the safety of medicines, respond to product-related enquiries, provide medical information, and administer patient support programmes.
- **Sales and Marketing:** In interactions with healthcare professionals, AstraZeneca processes personal information to deliver relevant scientific or product updates, manage professional relationships, and meet disclosure requirements such as transfers of value.
- **Employment and Human Resources:** Employee and candidate data are processed for recruitment, human resources management, payroll administration, and compliance with legal obligations.
- **Business Operations:** The management of contracts, suppliers, and business communications may necessitate the processing of personal information to support legitimate business interests.

AstraZeneca adheres to privacy laws such as POPIA, GDPR and other local data protection regulations. Processing is always for legitimate reasons, typically based on consent, contract fulfilment, legal obligations, or legitimate interests. Data security and confidentiality are priorities, and information is protected according to strict company policies and regulations.

5.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, address, registration numbers of companies or identity numbers, employment status and bank information
Service Providers	Company names, registration numbers, vat numbers, contact persons, contractual information and bank information
Employees	Names, ID numbers, demographic data, employment history, payroll data, performance records, disciplinary records, address, qualifications, gender, race and medical documentation, audit logs, access controls, training and development data
Healthcare Professionals (HCPs)	Names, professional registration numbers, qualifications, practice details, contact information, communication and preference details, financial details (if applicable for approved honorarium payments or sponsorships), and interaction history with AstraZeneca
Clinical Trial Participants	Names or pseudonyms, contact details, medical history, genetic data, biometric data, trial participation records, and consent documentation
Website Users / Digital Platform Users	IP addresses, browser data, device identifiers, location data, cookies, and user preferences (collected via AstraZeneca's digital platforms)

5.3 The recipients or categories of recipients to whom the personal information may be supplied.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and name for criminal checks	South African Police Services
Qualifications for qualification verifications	South African Qualifications Authority
Credit and payment history for credit information	Credit Bureaus
Employment history and references	Previous employers, recruitment agencies, and background screening service providers
Medical and health information (e.g. for occupational health or clinical trials)	Medical aid providers, occupational health practitioners, ethics committees, and regulatory authorities (e.g. SAHPRA)
Tax and payroll data	South African Revenue Service (SARS), payroll administrators, and pension/provident fund administrators
Banking details	Financial institutions, internal finance departments, and auditors
Contact details and demographic data	Internal departments (e.g. HR, Compliance), marketing service providers (with consent), and IT service providers
Clinical trial data and genetic/biometric information	CROs, regulatory bodies, international AstraZeneca affiliates (subject to cross-border safeguards), and ethics committees
Digital identifiers (e.g. IP address, cookies)	IT security providers, analytics platforms, and digital marketing partners (under data processing agreements)

5.4 Planned transborder flows of personal information

AstraZeneca may transfer certain categories of personal information across borders for operational, regulatory, and research purposes. These transfers are conducted in accordance with **Section 72 of the POPIA**, ensuring that the recipient country or entity provides an adequate level of data protection.

5.5 AstraZeneca Information Security Measures

AstraZeneca implements a comprehensive suite of **technical, physical, and organizational safeguards** to ensure the **confidentiality, integrity, and availability** of personal information under its control. These measures are aligned with global best practices and AstraZeneca's internal data protection policies.

Technical Safeguards

- **Data Encryption:** All sensitive personal information is encrypted both at rest and in transit using industry-standard encryption protocols (e.g. AES-256, TLS).
- **Access Controls:** Role-based access control (RBAC) ensures that only authorized personnel can access specific categories of personal information.
- **Multi-Factor Authentication (MFA):** Enforced for all remote and privileged access to internal systems.
- **Firewalls and Intrusion Detection Systems (IDS):** Deployed to monitor and block unauthorized access attempts.
- **Endpoint Protection:** Anti-virus, anti-malware, and endpoint detection and response (EDR) tools are installed on all company devices.
- **Regular Patching and Updates:** Operating systems and applications are routinely updated to mitigate vulnerabilities.

Organizational Safeguards

- **Data Protection Policies:** Comprehensive internal policies govern the collection, processing, and storage of personal information.
- **Employee Training:** Regular POPIA and cybersecurity awareness training is provided to all staff.
- **Third-Party Risk Management:** Contracts with service providers include data protection clauses and require compliance with AstraZeneca's security standards.

Physical Safeguards

- **Secure Premises:** Access to physical offices and data centres is restricted via access cards and monitored by CCTV.
- **Document Management:** Physical records containing personal information are stored in locked cabinets with limited access.

Monitoring and Incident Response

- **Audit Logging:** All access to personal information is logged and monitored for suspicious activity.
- **Incident Response Plan:** A formal data breach response plan is in place, including notification procedures in line with POPIA.

6. AVAILABILITY OF THE MANUAL

6.1 A copy of the Manual is available:

6.1.1 <https://www.astrazeneca.com/country-sites/african-cluster.html> - !, if any;

6.1.2 AstraZeneca South Africa's head office for public inspection during normal business hours;

6.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

6.1.4 to the Information Regulator upon request.

6.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

7. UPDATING OF THE MANUAL

The Deputy Information Officer of AstraZeneca will on a regular basis update this manual.

Issued by



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Interim Country President : African Cluster

AstraZeneca Information Officer