

Pfizer Laboratories Proprietary Limited – PAIA Manual (South Africa)

1 Introduction and purpose of the Manual

This manual is published in terms of section 51 of the *Promotion of Access to Information Act, 2000 (PAIA)*. Its purpose is to assist members of the public in understanding the categories of records held by Pfizer Proprietary Limited (**Pfizer**), how to request access to those records where access is required for the exercise or protection of rights, the applicable procedures and fees, and how Pfizer processes personal information as contemplated by the *Protection of Personal Information Act, 2013 (POPIA)*.

This manual is available on the Pfizer website, at the principal place of business of Pfizer for public inspection during normal business hours, to any person on request and upon the payment of a reasonable fee, and to the Information Regulator upon request. Pfizer will review this manual on a regular basis as required.

2 Pfizer's details and Information Officer

Pfizer Laboratories is a private company incorporated in South Africa with registration number 1954/000781/07. The registered office is Building 2, First Floor, Maxwell Office Park, 37 Magwa Crescent, Waterfall City, Midrand, 2090. Pfizer's Information Officer is Tasmin McNeill, contactable at Tasmin.mcneill@pfizer.com and +27 60 961 9860.

3 The Information Regulator's Guide to PAIA

The Information Regulator publishes a Guide (accessible [online](#)) that explains how to exercise rights of access to information under PAIA and POPIA. Copies of the Guide are available free of charge from the Information Regulator and from Pfizer's Information Officer upon request. The Guide is available in official languages and in accessible formats from the Information Regulator.

The Information Regulator may be contacted at Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191, by telephone at 010 023 5200 or 0800 017 160, and by email at enquiries@inforegulator.org.za. The Information Regulator's website contains further details regarding PAIA and POPIA processes and forms

4 Applicable legislation

Pfizer's records are maintained in compliance with relevant South African legislation applicable to its operations. These laws include, without limitation:

- Companies Act, 2008
- Income Tax Act, 1962
- Value-Added Tax Act, 1991
- Labour Relations Act, 1995
- Basic Conditions of Employment Act, 1997
- Employment Equity Act, 1998
- Skills Development Act, 1998
- Unemployment Insurance Act, 2001
- Occupational Health and Safety Act, 1993
- Compensation for Occupational Injuries and Diseases Act, 1993
- Electronic Communications and Transactions Act, 2002
- Consumer Protection Act, 2008
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Competition Act 89 of 1998
- POPIA

5 **Records that are automatically available**

Certain records are available without a formal request under PAIA. These include general information made publicly available on Pfizer's website and marketing materials intended for public distribution.

6 **Records available on request**

Pfizer holds records in multiple categories that may be available on request under PAIA, subject to applicable grounds for refusal. These categories include:

- corporate governance records
- statutory registers
- shareholder and director records where applicable
- contracts with customers, agents, dealers and vendors
- financial and tax records
- employment-related records, health and safety records
- IT and security records
- marketing and customer relationship records
- correspondence and administrative records generated in the ordinary course of business.

The existence of a category in this manual does not imply that all records within the category will be disclosed. Requests are evaluated on a case-by-case basis, and disclosure depends on the request meeting the statutory requirements and not being subject to relevant grounds of refusal.

7 **Categories of data subjects and personal information**

Pfizer processes personal information about various categories of data subjects in the course of its business. These categories include employees, contractors, directors and officers, job applicants, agents and dealers who promote or resell products, customers and prospective customers, vendors and other service providers, and visitors to Pfizer's premises and website.

The personal information processed may include identity and contact information, employment and qualifications information, records relevant to human resources administration, banking and payment details, tax and statutory identifiers where required, transactional data associated with orders and services, due diligence and credit information where permitted by law, technical information collected through business systems and websites, and communications and preferences.

Pfizer processes personal information to conduct its pharmaceutical, research, commercial and operational activities, and to comply with legal, regulatory, and contractual obligations. This includes:

- rendering services and fulfilling contractual agreements;
- administering employment-related functions such as staff management, recruitment, payroll, and benefits administration;
- securing and maintaining its IT systems, digital infrastructure, and physical premises;
- meeting finance, tax, and statutory compliance requirements;
- managing customer, supplier, and healthcare-provider relationships;
- conducting marketing and communication activities where appropriate;
- maintaining historical records and business-related statistics;
- ensuring safety, security, fraud prevention, and other legitimate business purposes;
- conducting and supporting clinical trials, including participant recruitment, informed consent management, and trial data processing;
- collecting, recording, and reporting adverse event data to fulfil regulatory safety reporting obligations;
- and maintaining regulatory submissions, product registrations, and post-market surveillance records as required by health authorities.

8 Recipients and disclosures of personal information

Pfizer may disclose personal information to internal departments and affiliates where necessary, to software and IT service providers, payment partners and banks, logistics partners and other operators engaged to support operations, professional advisers and auditors, credit bureaus where applicable, and regulators and public authorities where disclosure is required by law. Any such disclosures are made for the purposes described in this manual and subject to appropriate safeguards.

9 Planned cross-border flows

Personal information may be transferred outside South Africa where necessary for Pfizer's operations, for example to group companies and service providers that support IT, communications, or logistics services. Pfizer implements measures required by POPIA to ensure adequate protection in such transfers. These measures may include contractual obligations on recipients to protect information in a manner substantially similar to POPIA, reliance on statutory permissions to effect transfers necessary for contracts concluded in your interest, or other recognised transfer mechanisms appropriate for the destination country and the nature of the processing.

10 Information security measures

Pfizer maintains appropriate and reasonable technical and organizational security measures to protect personal information against unauthorised access, unlawful processing, accidental loss, destruction, or damage. Measures include access controls, role-based permissions, encryption in transit and at rest where appropriate, vulnerability and patch management, employee confidentiality undertakings and awareness training, vendor diligence and contractual controls, and incident response procedures.

11 Data subject rights

Data subjects have the right to object to the processing of their personal information in terms of section 11(3) of POPIA. A data subject may object to the processing of personal information where the processing is based on any of the following grounds, unless legislation provides for such processing: (a) processing protects a legitimate interest of the data subject; (b) processing is necessary for the proper performance of a public law duty by a public body; or (c) processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied. A data subject who wishes to object to the processing of personal information must complete the prescribed form.

A data subject may request the correction or deletion of personal information about the data subject that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or the destruction or deletion of a record of personal information that the responsible party is no longer authorised to retain. A data subject who wishes to request correction or deletion must complete the prescribed form.

12 Procedure for requesting access to records

A requester seeking access to a record must submit a request to the Information Officer in the prescribed manner as set out in **Annexure 1**. The request must contain sufficient detail to identify the record and the requester, specify the form of access sought, and provide the requester's contact details. If the request is made on behalf of another person, evidence of authority must be provided. A request fee may be payable before the request is processed. A schedule of the prescribed fees is set out in **Annexure 2**.

The Information Officer will consider the request in accordance with PAIA and communicate the decision within the statutory timeframe. Should an individual be unable to complete the prescribed form owing to illiteracy, disability, or any other reason, an oral request may be made to the Information Officer, who will assist the individual in making the request.

Pfizer Laboratories (Pty) Ltd
First Floor, Building 2, Maxwell Office Park
Magwa Crescent, Waterfall City
Midrand, 2090, South Africa
Pfizer Call Centre: 0860 Pfizer (734 937)
Website: www.pfizer.co.za



PAIA sets out mandatory and discretionary grounds for refusing access to records. Mandatory protections include the privacy of third parties where disclosure would involve unreasonable disclosure of personal information, the commercial information of third parties, and the safety of individuals and protection of property. Records subject to legal privilege are protected unless the privilege is waived. Pfizer may refuse access to protect its own commercial information where disclosure would likely cause harm to its commercial interests, reveal trade secrets, or prejudice negotiations, and may refuse access to computer programs and research information where disclosure would cause serious disadvantage. Where part of a record is protected and the remainder can be disclosed, Pfizer will consider granting access to the disclosable portion.

If access is granted, Pfizer will inform the requester of any access fee payable and the form in which access will be provided. If access is refused, Pfizer will provide adequate reasons.



Annexure 1

REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY

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
(Address)
Email address:

Mark with an "X"

- Request is made in my own name
 Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made <i>(when made on behalf of another person)</i>				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			



Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<p><i>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.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			



TYPE OF RECORD (Mark the applicable box with an "X")	
Record is in written or printed form	<input type="checkbox"/>
Record comprises virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	<input type="checkbox"/>
Record consists of recorded words or information which can be reproduced in sound	<input type="checkbox"/>
Record is held on a computer or in an electronic, or machine-readable form	<input type="checkbox"/>
FORM OF ACCESS (Mark the applicable box with an "X")	
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>)	<input type="checkbox"/>
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	<input type="checkbox"/>
Transcription of soundtrack (<i>written or printed document</i>)	<input type="checkbox"/>
Copy of record on flash drive (<i>including virtual images and soundtracks</i>)	<input type="checkbox"/>
Copy of record on compact disc drive (<i>including virtual images and soundtracks</i>)	<input type="checkbox"/>
Copy of record saved on cloud storage server	<input type="checkbox"/>
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>)	<input type="checkbox"/>
Postal services to postal address	<input type="checkbox"/>
Postal services to street address	<input type="checkbox"/>



Courier service to street address	<input type="checkbox"/>
Facsimile of information in written or printed format (including transcriptions)	<input type="checkbox"/>
E-mail of information (including soundtracks if possible)	<input type="checkbox"/>
Cloud share/file transfer	<input type="checkbox"/>
Preferred language (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)	<input type="checkbox"/>
PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>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.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right	
FEES	
<p>a A request fee must be paid before the request will be considered.</p> <p>b You will be notified of the amount of the access fee to be paid.</p> <p>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.</p> <p>d If you qualify for exemption of the payment of any fee, please state the reason for exemption</p>	
Reason	

Pfizer Laboratories (Pty) Ltd
 First Floor, Building 2, Maxwell Office Park
 Magwa Crescent, Waterfall City
 Midrand, 2090, South Africa
 Pfizer Call Centre: 0860 Pfizer (734 937)
 Website: www.pfizer.co.za



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:		
Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20__

Signature of Requester / person on whose behalf request is made

FOR INTERNAL USE

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

Signature of Information Officer

Annexure 2

Prescribed Fees

Item	Description	Amount
	The request fee payable by every requester	R140.00
	Photocopy / printed black & white copy of A4-size page	R2.00 per page or part thereof
	Printed copy of A4-size page	R2.00 per page or part thereof
	For a copy in a computer-readable form on: <ul style="list-style-type: none"> • Flash drive (to be provided by requestor) • Compact disc – <ul style="list-style-type: none"> ○ If provided by the requestor ○ If provided to the requestor 	R40.00 R40.00 R60.00
	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation from the service provider
	Copy of visual images	
	Transcription of an audio record, per A4-size page	R24.00
	Copy of an audio record on: <ul style="list-style-type: none"> • Flash drive (to be provided by requestor) • Compact disc – <ul style="list-style-type: none"> ○ If provided by the requestor ○ If provided to the requestor 	R40.00 R40.00 R60.00
	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.	R145.00
	To not exceed the total cost of	R435.00
	Deposit: if search exceeds 6 hours	One third of amount per request calculated in terms of items 2 – 8
	Postage, e-mail or any other electronic transfer	Actual expense, if any