Enhanced Hospital Safety

Bluebird



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PAIA & POPIA MANUAL (Section 51)

Intelligent Medical Systems (Pty) Ltd ("IMS") — developer of the **Bluebird** Electronic Health Record (EHR)
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1) Introduction and Purpose

This manual is published in terms of **section 51 of the Promotion of Access to Information Act, 2000 (PAIA)** and sections **23–25 of the Protection of Personal Information Act, 2013 (POPIA)**. It explains what records IMS holds, which are available without a PAIA request, and how to request access to other records. It also summarises how IMS processes personal information when providing the Bluebird EHR and related services.

Scope: This manual covers the South African private body **Intelligent Medical Systems (Pty) Ltd** and its Bluebird products and services delivered in South Africa.

2) Company Details (section 51(1)(a))

Registered name: Intelligent Medical Systems (Pty) Ltd ("IMS")
Trading/brand: Bluebird (Hospital EHR, EMR and related modules)
Registration number: *1999/004554/07.*
Physical address (Head Office): Ground Floor, Block B, Regent Square, Kenilworth, Cape Town, 7700, South Africa
Postal address: *Ground Floor, Block B, Regent Square, Kenilworth, Cape Town, 7700, South Africa*
Telephone (South Africa): +27 (0)87 551 7644
Additional SA switchboard: 0861 629 329
International: +27 (0)21 680 5066
Email (general/support): support@intelms.com
Website: https://www.intelms.com

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3) Information Officer and Deputies (section 51(1)(a))

Information Officer (IO): The **Head of IMS** (as contemplated in PAIA) acts as IO.

Name: Dr Darryl Garth Vine
Tel: 082 7843353
Email: darryl@bluebird.co.za

Deputy Information Officer(s) (DIO): *To be designated by IMS.*

Name: Sr Nicola Ann Kelly
Tel: 082 9654670
Email: clinical@intelms.com

Contact for IO/DIO:

- Email: **support@intelms.com** (please mark FAO: Information Officer)
- Tel: **+27 (0)87 551 7644**
- Address: **IMS Head Office**, Ground Floor, Block B, Regent Square, Kenilworth, Cape Town, 7700, South Africa

4) Guide on how to use PAIA (section 51(1)(b))

A Guide is published by the **Information Regulator (South Africa)** to assist persons who wish to exercise their PAIA rights. The Guide explains how to make a PAIA request (using **Form 2**), applicable fees, and remedies. The latest Guide and forms are available from the Regulator's website.
How to obtain: See the Regulator's PAIA page and Guide (English).

5) Records held by IMS (section 51(1)(c))

The following **broad categories of records** are held by IMS and may be requested under PAIA where not otherwise publicly available. Access may be subject to **mandatory and discretionary grounds of refusal** (e.g., protecting confidential information, personal information of third parties, privileged records, security-sensitive records) and to **applicable fees**.

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5.1 Corporate & Governance

- Company incorporation and statutory records; shareholder/director records; resolutions; policies and procedures.
- Risk management, information security and compliance frameworks.
- PAIA/POPIA registers (e.g., PAIA request register, PAIA annual report, complaints register).

5.2 Finance & Commercial

- Customer and supplier contracts; statements of work; quotes; invoices; procurement and asset registers; insurance policies; tax records.

5.3 Human Resources

- Employment contracts; HR policies; training records (including privacy/security training); payroll and benefits records; workplace health and safety records.

5.4 Products & Operations (Bluebird)

- Product architecture and operational documentation; service descriptions; implementation and integration specifications; uptime/DR plans and testing records; quality and safety materials; user manuals; clinical content governance records.

5.5 Customer Support & Success

- Support tickets and logs; change requests; service level reports; onboarding and training materials.

5.6 Marketing & Website

- Website content; brochures; white papers; case studies; event and webinar materials; analytics (aggregated/technical).

Note: Some of the above records will include **personal information** of customers, patients, staff or third parties and may be subject to refusal or redaction for POPIA/PAIA compliance.

6) Records automatically available (section 51(1)(c))

The following categories of information are available **without a PAIA request**, free of charge, via IMS's websites or on request from support:

- **Bluebird product pages and brochures** (Hospital EHR, EMR/Doctor, Nursing Home, Integration/SDPR, Benefits, Principles).
- **Terms / conditions** of use and high-level privacy statements appearing on product pages.

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- **Public white papers and product documents** (e.g., Bluebird development history and adoption, user manuals, ward procedures, tasks, infection control and AMS reporting).
- **Contact details** for South Africa and North America.

If a document is not listed publicly, you may request it under PAIA.

7) Requesting access to records (section 51(1)(e))

1. **Complete PAIA Form 2** (Request for Access to Record) and **address it to the Information Officer** of IMS.
2. **Submit** the completed form and any required **request fee** to the IO/DIO at **support@intelms.com** (or deliver to the Head Office address).
3. **Describe the right** you wish to exercise or protect and **the record(s) requested** with sufficient detail to identify them.
4. **Proof of identity/authority**: include certified ID (and authority if acting for another person or juristic person).
5. **Fees**: IMS may require the prescribed **request fee** and, if the request is granted, an **access fee** (including reproduction and search fees). A **deposit** may be requested for large or time-consuming requests.
6. **Decision period**: IMS will respond **within 30 days** after receiving a valid request (subject to permitted extensions).
7. **Outcomes**: access **granted** (with/without conditions), **partially granted** (with redactions), or **refused** on lawful grounds.
8. **Remedies**: If dissatisfied, you may **lodge a complaint** with the **Information Regulator (South Africa)**. (Private bodies do **not** have an internal appeal process under PAIA.)

Forms & fees: The Regulator publishes the **forms** and **fee schedules**. IMS applies the latest prescribed fees.

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8) Processing of Personal Information (POPIA summary)

This section is provided in terms of sections 23–25 of POPIA and related guidance.

8.1 Purpose of processing

- Provision, operation and support of the **Bluebird EHR/EMR** and related healthcare information systems and services; clinical documentation; decision support; integrations; analytics/reporting for quality and safety.
- Business operations (customer management, finance, HR, security, legal compliance).
- Marketing and communications (with consent or other lawful basis, as applicable).

8.2 Categories of data subjects

- **Patients** (whose information is processed by healthcare providers using Bluebird).
- **Healthcare professionals and staff** of customer facilities.
- **Customer representatives and prospects** (business-to-business contacts).
- **IMS personnel and contractors.**

8.3 Categories of personal information

- Patient identifiers, demographics and clinical data captured by healthcare providers in Bluebird modules (e.g., encounters, orders, results, observations, medications, procedures).
- Staff identifiers, role/credentials, usage/audit logs.
- Business contact information; contractual records; billing details.
- Technical/usage data necessary for security, availability and performance.

8.4 Recipients / sharing

- Customer facilities and their nominated third parties (e.g., laboratories, radiology, registries) through **integrations/interoperability**.
- IMS's trusted service providers (e.g., **cloud infrastructure**, secure communications, support tooling) under appropriate agreements.
- Regulators or authorities where legally required.

8.5 Cross-border flows

- Bluebird is delivered as a **cloud solution** (currently **Amazon Web Services**; Azure is an option). Personal information may be processed or stored in data centres located outside South Africa, subject to **section 72 POPIA** safeguards and contractual measures.

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8.6 Security measures (high level)

- Information security program aligned to industry practices; **privacy and security workforce training** aligned with **POPIA** (and, where relevant, **HIPAA**); **disaster recovery** processes with periodic testing; access controls and audit logging.
- An Operational Security Lead oversees testing and readiness.

8.7 Retention

- Records are retained for as long as reasonably **necessary** for the purposes described above and to comply with **legal, regulatory and contractual** obligations. Specific retention schedules may be available on request.

8.8 Data subject rights (POPIA)

- **Access** to personal information (section 23).
- **Correction, deletion or destruction** of inaccurate, irrelevant, excessive, out-of-date, incomplete or misleading information (section 24).
- **Objection to processing** (section 11(3)).
- **Withdrawal of consent** (where consent is the lawful basis).
- **Lodge a complaint** with the **Information Regulator** if unsatisfied with IMS's response.

How to exercise POPIA rights:
Contact the IO/DIO using the details in Section 3. IMS may request additional information to verify identity and locate records. Some requests may be actioned through the relevant healthcare provider (as they are responsible for their patient records within Bluebird).

9) Categories of Requesters (typical)

- Natural/juristic persons seeking to exercise or protect a right.
- Employees, suppliers and customers seeking access to their own information or records necessary to exercise legal rights.
- Regulators or oversight bodies acting within their powers.

10) Information available on IMS websites (non-exhaustive)

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- **About IMS/Bluebird**; **Benefits**; **Hospital/Doctor/Nursing Home** product pages; **Integration** and **Single Digital Patient Record (SDPR)**; **Principles**; **Terms**; **Contact**.
- **Product collateral and white papers** (e.g., development history/technical details; user manuals; ward procedures; tasks; infection control & AMS reporting).
- **News/learning resources** relevant to quality and safety.

IMS may update the URLs and materials from time to time. If a link is unavailable, please email **support@intelms.com** for assistance.

11) Grounds for refusal (summary)

IMS may refuse access to requested records on grounds permitted by PAIA, including but not limited to: protection of **privacy** of third parties; **confidential information** of IMS or a third party; **safety** of individuals and property; **privileged** documents; and **commercial information** that, if disclosed, could cause harm. Where possible, IMS may provide **severed access** (redaction) to portions of records that can lawfully be disclosed.

12) Fees (summary)

PAIA **request** and **access** fees (and possible **deposits**) apply as prescribed by regulation. Current fee tables are published by the **Information Regulator (South Africa)**. IMS applies those prescribed amounts and will notify requesters of any fees before processing.

13) How to submit a PAIA request to IMS (quick checklist)

- ✅ Complete **PAIA Form 2** (Request for Access to Record).
- ✅ Clearly describe the **right** you seek to exercise or protect and the **record** you need.
- ✅ Attach **certified ID** and any **authority** documents.
- ✅ Send to the **Information Officer** at **support@intelms.com** (subject: *PAIA Request – [your name]*), or deliver to the Head Office.
- ✅ Pay the **prescribed fees/deposit** (if required).

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- ✅ Await IMS's **decision within 30 days** (subject to extension).
- ✅ If dissatisfied, lodge a **complaint** with the **Information Regulator**.

14) Availability of this Manual

- **Electronic:** Available on request from **support@intelms.com** and may be published on **www.intelms.com**.
- **Physical:** Available for inspection at IMS Head Office during normal business hours.

15) Updates to this Manual

This manual will be reviewed periodically and updated where necessary. The **latest version** supersedes all prior versions.

16) Contact Details (summary)

Information Officer / Deputy Information Officer
Intelligent Medical Systems (Pty) Ltd
Ground Floor, Block B, Regent Square, Kenilworth, Cape Town, 7700, South Africa
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