



PROMOTION OF ACCESS TO INFORMATION ACT

Act 2 of 2000

PAIA MANUAL

Trinity Health Group (Pty) Ltd
t/a Cleanse Colon Hydrotherapy

Registration Number: 2011/005900/07

95 Bram Fischer Drive, Ferndale, Randburg

info@cleansesa.co.za | www.cleancolon.co.za

Version 1.0 | Published: 2 June 2026

This document is available for download from www.cleancolon.co.za.
A printed copy is available for inspection at the registered address free of charge.

1. Introduction

This manual has been compiled in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"). PAIA gives effect to the constitutional right of access to information held by both public and private bodies, as enshrined in Section 32 of the Constitution of the Republic of South Africa, 1996.

The purpose of this manual is to:

- Inform the public of the categories of records held by Trinity Health Group (Pty) Ltd t/a Cleanse Colon Hydrotherapy ("the Company");
- Describe the procedure for requesting access to records held by the Company;
- Outline the grounds upon which a request for access to records may be refused; and
- Inform data subjects of their rights under PAIA and the Protection of Personal Information Act, 4 of 2013 ("POPIA").

This manual is available for inspection free of charge at the Company's registered address and as a downloadable PDF at www.cleancolon.co.za.

2. Details of the Private Body

Full Legal Name	Trinity Health Group (Pty) Ltd
Trading Name	Cleanse Colon Hydrotherapy
Registration Number	2011/005900/07
Registered Address	95 Bram Fischer Drive, Ferndale, Randburg
Postal Address	95 Bram Fischer Drive, Ferndale, Randburg
Email Address	info@cleansesa.co.za
Website	www.cleancolon.co.za
Nature of Business	Naturopathic gut health practice providing colon hydrotherapy and associated wellness services
Branches	Ferndale (main) Fourways Pretoria

3. Information Officer

In terms of Section 1 of PAIA, the head of a private body is responsible for fulfilling the obligations imposed under PAIA. Trinity Health Group (Pty) Ltd has designated the following Information Officer:

Information Officer	Briony Gulbrandsen
Capacity	Chief Operations Officer / Director

Address	95 Bram Fischer Drive, Ferndale, Randburg
Email Address	briony@cleansesa.co.za
Deputy Information Officer	Not appointed

The Information Officer is responsible for:

- Encouraging compliance with PAIA;
- Dealing with requests made to the Company in terms of PAIA;
- Working with the South African Human Rights Commission (SAHRC) in relation to PAIA;
- Ensuring compliance with POPIA in respect of the processing of personal information; and
- Handling complaints related to the processing of personal information.

4. South African Human Rights Commission Guide

The South African Human Rights Commission (SAHRC) has compiled a guide to assist persons wishing to exercise any right contemplated in PAIA. This guide is available from the SAHRC as follows:

Organisation	South African Human Rights Commission
Physical Address	29 Princess of Wales Terrace, Parktown, Johannesburg, 2193
Postal Address	Private Bag 2700, Houghton, 2041
Telephone	+27 (0)11 877 3600
Website	www.sahrc.org.za
Email	PAIA@sahrc.org.za

5. Records Available Without a Formal PAIA Request

5.1 Publicly Available Records

- This PAIA Manual (available for download at www.cleancolon.co.za and for inspection at the registered address);
- Company registration documents lodged with the CIPC;
- Marketing materials and website content at www.cleancolon.co.za;
- Price lists, service descriptions, and booking information available at branches or on the website.

5.2 Records Available to Data Subjects on Request

Data subjects (clients and employees) have the right to request access to their own personal information held by the Company without a formal PAIA process, subject to verification of identity. Requests should be directed to the Information Officer.

6. Categories of Records Held

The Company holds the following categories of records. Access is subject to the procedure in Section 7 and may be refused on the grounds in Section 9.

6.1 Client Records

- Client intake forms and health history questionnaires;
- Treatment records and session notes;
- Consent and indemnity forms;
- Programme enrolment and participation records;
- Communication records (email, WhatsApp, SMS);
- Payment records and invoices;
- Complaints and incident records.

6.2 Human Resources and Employment Records

- Employee personal records (name, ID, contact details, banking details);
- Employment contracts and letters of appointment;
- Payroll and remuneration records;
- Leave records and attendance registers;
- Performance reviews and disciplinary records;
- Training and certification records;
- Termination records and exit documentation.

6.3 Financial Records

- Annual financial statements;
- Management accounts;
- Bank statements;
- Tax returns and SARS correspondence;
- Supplier invoices and purchase orders;
- Point-of-sale and booking system transaction records.

6.4 Operational and Administrative Records

- Company registration documents and memorandum of incorporation;
- Lease agreements and property records;
- Insurance policies;
- Supplier and service provider contracts;
- Health and safety records;
- Equipment maintenance and compliance records;
- Training materials and standard operating procedures.

6.5 Marketing and Communication Records

- Marketing materials, campaigns, and brand assets;
- Social media content and advertising records;
- Client database and communication opt-in records;
- Third-party platform agreements (booking, advertising, analytics).

6.6 Legal and Compliance Records

- This PAIA Manual and POPIA compliance records;
- Regulatory correspondence;
- Legal opinions and correspondence with attorneys;
- SAPS statements and police case reference numbers (where applicable);
- Licences and permits.

7. Procedure for Requesting Access to Records

7.1 Who May Request

Any person wishing to access records held by the Company must submit a request in accordance with the procedure below. This includes clients, former clients, employees, former employees, and third parties with a legitimate interest in the records.

7.2 Form of Request

All requests must be submitted using the prescribed Request for Access to Records Form (Form C), as set out in the Regulations under PAIA. Copies of Form C are available:

- From the Information Officer at 95 Bram Fischer Drive, Ferndale;
- On the SAHRC website at www.sahrc.org.za; or
- On the Government Gazette website.

The completed Form C must be submitted to the Information Officer at the address or email provided in Section 3 of this manual.

7.3 Information Required in the Request

The request form must include:

- The full name, contact details, and identity number of the requester;
- A description of the record(s) requested, with sufficient detail to identify the record;
- The form in which access is required (e.g. copy, inspection);
- If acting on behalf of another person, proof of capacity and details of that person;
- The right the requester is seeking to exercise or protect, and an explanation of why access is required; and
- Proof of identity (a certified copy of a South African identity document or passport).

7.4 Request Fees

A request fee is payable before the Company is obliged to process the request. The current fee structure is determined by the Regulations under PAIA and is available from the Information Officer on request. The requester will be notified of the applicable fee prior to processing.

No fee is payable in respect of:

- A request for access to a requester's own personal information; or
- A request by a person who is unable to pay due to indigence, subject to the Company's satisfaction as to the person's circumstances.

7.5 Response Time

The Company will respond to a request within 30 (thirty) calendar days of receipt and payment of the applicable fee. If the request involves a large volume of records, the response period may be extended by a further 30 (thirty) calendar days by notifying the requester in writing.

7.6 Manner of Access

Where a request is granted, access will be provided by:

- Providing a copy of the record;
- Permitting inspection or viewing of the record; or
- Providing a written summary of the information.

8. Protection of Personal Information Act (POPIA)

8.1 Overview

The Company processes personal information in compliance with POPIA (Act 4 of 2013). The Company has registered its Information Officer with the Information Regulator of South Africa.

8.2 Categories of Data Subjects

- Clients and prospective clients;
- Employees and former employees;
- Suppliers and service providers;
- Business contacts.

8.3 Categories of Personal Information Processed

- Identity information (name, ID number, date of birth);
- Contact information (address, telephone, email);
- Financial information (banking details, payment records);
- Health information (intake forms, treatment records, health history) — classified as Special Personal Information under POPIA and processed only with explicit informed consent;
- Employment information (for staff);
- Communication records.

8.4 Purpose of Processing

- Providing colon hydrotherapy and associated wellness services;
- Managing client programmes and treatment records;
- Administering employment relationships;
- Complying with legal and regulatory obligations;
- Communicating with clients and sending relevant health and service information (with consent);
- Financial administration and accounting;
- Improving services and conducting client satisfaction activities.

8.5 Data Subject Rights

Data subjects have the following rights under POPIA:

- The right to be notified that personal information is being collected;
- The right to access their personal information held by the Company;

- The right to request correction or deletion of inaccurate, irrelevant, or out-of-date personal information;
- The right to object to the processing of personal information;
- The right to submit a complaint to the Information Regulator.

Requests relating to personal information should be directed to the Information Officer (see Section 3).

8.6 Third-Party Operators

The Company makes use of the following categories of third-party operators who process personal information on its behalf:

- Booking and practice management platforms;
- Payment processing services;
- Email and communication platforms;
- Digital marketing and advertising platforms (Meta, Google);
- Accounting and payroll services.

All operators are required to process personal information only on the Company's instructions and in accordance with appropriate security measures.

8.7 Security Safeguards

The Company takes appropriate technical and organisational measures to protect personal information against unauthorised access, loss, destruction, unlawful processing, and accidental damage. In the event of a security compromise, the Company will notify affected data subjects and the Information Regulator as required by Section 22 of POPIA.

8.8 Information Regulator Contact Details

Organisation	Information Regulator (South Africa)
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	+27 (0)10 023 5207
Email	inforeg@justice.gov.za
Website	www.inforegulator.org.za

9. Grounds for Refusing Access to Records

The Company may refuse access to records on one or more of the following grounds as provided in Part 3 of Chapter 4 of PAIA:

9.1 Mandatory Protection

- Records containing personal information of a third party where disclosure would constitute an unreasonable invasion of that person's privacy (Section 63);
- Records that could endanger the life or physical safety of an individual (Section 62);

- Records containing confidential third-party commercial, financial, or technical information (Section 64);
- Records privileged from production in legal proceedings (Section 67).

9.2 Discretionary Protection

- Records that could prejudice the safety of property;
- Records relating to the economic interests and financial welfare of the Company where disclosure could reasonably be expected to cause harm (Section 68);
- Records not reasonably required by the requester for the protection of a right;
- Records relating to a pending investigation, litigation, or disciplinary proceeding.

Note: The Company will not refuse access merely because the request involves inconvenience or effort. Where partial access is possible, the Company will grant access to those parts of a record not subject to grounds for refusal (Section 28 of PAIA).

10. Internal Appeal and Complaints

10.1 Decision by Information Officer

If the Information Officer refuses a request, the requester will be notified in writing of the decision and the grounds for refusal. The notice will advise the requester of any right of judicial review available.

10.2 Right to Approach a Court

A requester aggrieved by a decision of the Information Officer may apply to a court of competent jurisdiction for relief. In terms of Section 82 of PAIA, a court may order access to the record, order disclosure, or make any other appropriate order.

10.3 Complaints to the Information Regulator

Any person who believes that the Company has failed to comply with PAIA or POPIA may lodge a complaint with the Information Regulator at the contact details provided in Section 8.8 of this manual.

11. Contact for Queries and Service Complaints

Any person who is dissatisfied with the handling of their PAIA request or personal information query is encouraged to contact the Information Officer in the first instance:

Information Officer	Briony Gulbrandsen
Email	briony@cleansesa.co.za
Address	95 Bram Fischer Drive, Ferndale, Randburg
Operating Hours	Monday to Friday, 08:00 – 17:00

12. Review and Amendment of this Manual

This manual will be reviewed and updated as required to reflect changes in legislation, the Company's structure, or its record-keeping practices. The current version will at all times be available at **www.cleancolon.co.za** and for inspection at the registered address.

Current Version	1.0
Date of Issue	2 June 2026
Approved by	Briony Gulbrandsen, Information Officer
Next Review Date	[To be completed]

ANNEXURE A

HOW TO SUBMIT A REQUEST FOR ACCESS TO RECORDS (FORM C)

Form C is the prescribed form under the PAIA Regulations for requesting access to records held by a private body. It is available from the SAHRC at www.sahrc.org.za or on the Government Gazette website.

Step 1 — Obtain Form C

Download Form C from www.sahrc.org.za or request a copy from the Information Officer at briony@cleansesa.co.za.

Step 2 — Complete the Form

Complete all sections of Form C in full, including your name, identity number, contact details, a description of the records you are requesting, and the right you are seeking to exercise or protect.

Step 3 — Attach Proof of Identity

Attach a certified copy of your South African identity document or passport.

Step 4 — Submit the Form

Submit the completed form and identity document by email to briony@cleansesa.co.za, or deliver in person to 95 Bram Fischer Drive, Ferndale, Randburg during business hours (Monday to Friday, 08:00 – 17:00).

Step 5 — Pay the Request Fee

You will be notified of the applicable request fee (if any). The fee must be paid before the Company is obliged to process your request. No fee applies for access to your own personal information.

Step 6 — Await Response

The Company will respond within 30 (thirty) calendar days of receipt of your completed form and payment of the applicable fee. You will be notified whether your request has been granted or refused, and the reasons for any refusal.

Address all requests and correspondence to:

The Information Officer

Trinity Health Group (Pty) Ltd t/a Cleanse Colon Hydrotherapy
95 Bram Fischer Drive, Ferndale, Randburg
Email: briony@cleansesa.co.za