



**PARAGON 28 MEDICAL DEVICES TRADING LIMITED (INCORPORATED  
IN IRELAND)  
("Paragon 28")**

**THE PROMOTION OF ACCESS TO INFORMATION MANUAL  
("Manual")**

**PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO  
INFORMATION ACT 2 OF 200 (AS AMENDED)**

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	<b>"CEO"</b>	Chief Executive Officer;
1.2	<b>"DIO"</b>	Deputy Information Officer;
1.3	<b>"IO"</b>	Information Officer;
1.4	<b>"Minister"</b>	Minister of Justice and Correctional Services;
1.5	<b>"PAIA"</b>	Promotion of Access to Information Act, 2 of 2000 (as Amended);
1.6	<b>"POPIA"</b>	Protection of Personal Information Act, 4 of 2013;
1.7	<b>"Regulator"</b>	Information Regulator; and
1.8	<b>"Republic"</b>	Republic of South Africa.

## 2. PREAMBLE

- 2.1 PAIA came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights, that the person complies with the procedural requirements as set out in PAIA relating to a request for access to information, and provided that no grounds of refusal contained in PAIA are applicable.
- 2.2 Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual has to comply with.
- 2.3 This Manual constitutes the Paragon 28 PAIA manual. This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("**POPIA**"), which gives effect to everyone's Constitutional right to privacy. POPIA promotes the protection of personal

information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

- 2.4 This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

### 3. **ABOUT PARAGON 28**

Paragon 28 Medical Devices Trading Limited (Incorporated in Ireland), with registration number 2018/244055/10 ("**Paragon 28**"), is a leading medical device company specialising in innovative orthopaedic solutions for foot and ankle conditions. The company designs, manufactures, and distributes a broad range of orthopaedic implants, instruments, and systems used by surgeons to treat such conditions. In 2025, Paragon 28 was acquired by Zimmer Biomet South Africa Proprietary Limited ("**Zimmer Biomet**").

### 4. **KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PARAGON 28**

<b>Name of Private Body:</b>	Paragon 28 Medical Devices Trading Limited (Incorporated in Ireland)
<b>Designated Information Officer:</b>	<b>Marvin R. Shaw</b>
<b>Email address of Information Officer:</b>	<a href="mailto:privacy.global@zimmerbiomet.com">privacy.global@zimmerbiomet.com</a>
<b>Physical address:</b>	The Estuaries Block E 9 Oxbow Crescent Century City Western Cape 7441

### 5. **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 and made available the revised Guide on how to use PAIA, in an easily comprehensible form and manner,

as may be reasonably required by a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available in each of the official languages of South Africa and in braille. Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Information Regulator and the Information Officer free of charge, during normal working hours.

Any enquiries regarding the Guide should be directed to:

**Physical address:** JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg 2001

**E-mail address:** [enquiries@info regulator.org.za](mailto:enquiries@info regulator.org.za)

**Website:** <https://info regulator.org.za/>

## 6. PURPOSE OF THIS MANUAL

This Manual was prepared in accordance with section 51 of PAIA and is useful for the public to:

- 6.1 check the categories of records held by Paragon 28 which are available without a person having to submit a formal PAIA request;
- 6.2 have a sufficient understanding of how to make a request for access to a record and the categories of records held by Paragon 28;
- 6.3 know the description of the records held by Paragon 28 which are available in accordance with any other applicable legislation;
- 6.4 access all the relevant contact details of Paragon 28's Information Officer who will assist the public with the records they request access to;
- 6.5 know the description of the Guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 6.6 know the description of Paragon 28's processing activities in terms of POPIA, including information about the purpose of processing of personal information as well as the description of the categories of data subjects and of the information or categories of information relating thereto;

- 6.7 know the recipients or categories of recipients with whom Paragon 28 may share personal information with;
- 6.8 know if Paragon 28 has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be transferred to; and
- 6.9 know whether Paragon 28 has implemented appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which Paragon 28 processes.

## **7. ENTRY POINT FOR REQUESTS**

- 7.1 PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.
- 7.2 Information will therefore not be furnished unless a person provides sufficient particulars to enable Paragon 28 to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance.
- 7.3 The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 7.4 The Information Officer will facilitate the liaison with the internal legal team on all of these requests.
- 7.5 All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 4 above.

## **8. CATEGORY OF RECORDS OF PARAGON 28 WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

- 8.1 Paragon 28 does not have a separate notice of records automatically available to requesters. Information that is obtainable via the Paragon 28 website about Paragon 28 is automatically available and need not be formally requested in terms of this Manual. For purposes of section 51(1)(b)(ii) of the Act; these records are:

- 8.1.1 Brochures;
- 8.1.2 Press releases;
- 8.1.3 Publication;
- 8.1.4 Various other marketing and promotional material;
- 8.1.5 Terms of Use; and
- 8.1.6 Privacy Policy.

## 9. INFORMATION AVAILABLE IN TERMS OF POPIA

- 9.1 In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which data is processed by Paragon 28 will depend on the nature of the data and the particular data subject. Please also refer to Paragon 28's Privacy Policy for further information, which is available on our website at <https://www.zimmerbiomet.eu/en/privacy-notice>.
- 9.2 **Description of the categories of data subjects and of the information or categories of information collected by Paragon 28**

Categories of data subjects	Categories of Personal Information collected
Users of Online Services, Visitors to Zimmer Biomet's Websites and Physical Locations, and Senders of Inquiries	<p><i>Identity and Contact Information, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name or unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> <li>• employer/company</li> <li>• email address</li> <li>• postal address</li> <li>• phone number</li> <li>• username or code and password, security answers, and user preferences</li> <li>• contact information for related persons, such as authorized users of your account or designated representatives</li> <li>• customer number</li> <li>• company ID number such as account number</li> <li>• National Provider Identifier (NPI) number</li> </ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"> <li>• age</li> <li>• gender</li> <li>• preferred language</li> <li>• marital status</li> <li>• disability</li> <li>• date of birth</li> </ul> <p><i>Video, Audio and Recorded Information, such as:</i></p>

	<ul style="list-style-type: none"> <li>• still images</li> <li>• video (including via CCTV)</li> <li>• voicemails</li> <li>• recordings of your interactions with our Online Services, including with our customer service, whether through phone, email, SMS/text message, or chat</li> </ul> <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Internet Protocol (IP) addresses (which may identify your general geographic location or company)</li> <li>• browser type and browser language</li> <li>• device type</li> <li>• advertising IDs associated with your device (such as Apple’s Identifier for Advertising (IDFA) or Android’s Advertising ID (AAID))</li> <li>• date and time you use Zimmer Biomet’s Products and Services</li> <li>• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Products and Services</li> <li>• Activity and online behavior while on our Products and Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages, and product descriptions read</li> <li>• data collected from cookies or other similar technologies</li> <li>• geolocation information</li> </ul> <p><i>Anonymized / De-identified Data:</i> Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws</p>
Patients and Users of Medical Devices	<p><i>Identity and Contact Information, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name or a unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> <li>• employer / company</li> <li>• email address</li> <li>• postal address</li> <li>• phone number</li> <li>• username or code and password, security answers, and user preferences</li> <li>• contact information for related persons, such as authorized users of your account or designated representatives</li> </ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"> <li>• age</li> <li>• gender</li> <li>• preferred language</li> <li>• marital status</li> <li>• disability</li> </ul>

- ethnicity
- date of birth

*Video, Audio and Recorded Information, such as:*

- still images
- video (including via CCTV)
- recordings of your calls with our customer service representatives
- voicemails
- recordings of your interactions with our Online Services, whether through email, SMS/text message, or chat
- pictures and videos of diagnosis and treatment activities

*Technical Information, such as:*

- Internet Protocol (IP) addresses (which may identify your general geographic location or company)
- browser type and browser language
- device type
- advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID))
- date and time you use our Products and Services
- Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Products and Services
- activity and online behavior while on Our Products and Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages, and product descriptions read
- data collected from cookies or other similar technologies
- geolocation information

*Health Information, such as:*

- identification of pathologies/diseases
- identification number associated with your Products
- areas of interest in medical research
- treatment and surgery dates
- medical history and treatment information
- patient-reported outcome measures (e.g., responses to questionnaires and surveys about your health or treatment)
- DICOM images, X-rays, magnetic resonance imaging, and medical scans
- user activity
- therapy completion and use details
- communications with your Healthcare Provider, including audio video, or other recordings from telehealth sessions

	<ul style="list-style-type: none"> <li>• drug allergies, prescriptions and dosing health values taken, such as heart rate and blood pressure, gait patterns or rhythms</li> <li>• adverse event information</li> <li>• health insurance information and other information on payment for healthcare services</li> <li>• pregnancy status</li> <li>• contact information for designated recipients of your health information location data</li> <li>• pictures and videos of diagnosis and treatment activities</li> <li>• patient ID number</li> </ul> <p><i>Commercial and Financial Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Products and Services purchased, obtained, or considered</li> <li>• Bank account number and details</li> <li>• request documentation</li> <li>• customer service records</li> <li>• financial transaction history</li> <li>• financial account number</li> <li>• other payment information</li> </ul> <p><i>Anonymized / De-identified Data:</i> Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws</p>
Healthcare Providers	<p><i>Identity and Contact Information, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name or unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> <li>• employer / company</li> <li>• email address</li> <li>• postal address</li> <li>• phone number</li> <li>• username or code and password, security answers, and user preferences</li> <li>• contact information for related persons, such as authorized users of your account or designated representatives</li> <li>• customer number</li> <li>• company ID number such as account number</li> <li>• National Provider Identifier (NPI) number</li> <li>• Unique personal identifier</li> <li>• signature</li> </ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"> <li>• age</li> <li>• gender</li> <li>• preferred language</li> <li>• marital status</li> <li>• disability</li> <li>• date of birth</li> </ul> <p><i>Video, Audio, and Recorded Information, such as:</i></p>

- still images
- video (including via CCTV)
- recordings of your calls with our customer service representatives
- voicemails
- recordings of your interactions with our Online Services, whether through email, SMS/text message, or chat
- pictures and videos of treatment activities or training activities

*Technical Information, such as:*

- Internet Protocol (IP) addresses (which may identify your general geographic location or company)
- browser type and browser language
- device type
- advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID))
- Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Products and Services
- activity and online behavior while on our Products and Services and referring websites or applications including forms and other information submitted, videos watched, your clicks on our site pages, browsing time, and product descriptions read
- data collected from cookies or other similar technologies
- geolocation information

*Commercial and Financial Information, such as:*

- Products and Services purchased, obtained, or considered
- Bank account number and details
- request documentation
- customer service records
- financial transaction history
- financial account number
- other payment information
- tax identification number

*Professional and Educational Information, such as:*

- job title or position
- your employer, company with which you are associated, or principal
- working location
- National Provider Identifier (NPI) number
- state medical license number
- work skills
- employment history
- graduate degrees
- certifications
- professional memberships

	<ul style="list-style-type: none"> <li>• specialized training</li> <li>• responses to surveys and questionnaires</li> <li>• enrollment and attendance history for our education and training events</li> <li>• records of collaborations with Zimmer Biomet, such as consulting and other engagements</li> <li>• information from references</li> <li>• background checks</li> </ul> <p><i>Product Usage Information, such as:</i></p> <ul style="list-style-type: none"> <li>• technical and surgical data (pre-, intra-, and post-operative) and performance metrics derived from your use of certain Products or Services</li> <li>• date and time you use our Products and Services, including the Products and Services used</li> <li>• user preferences</li> <li>• purchasing tendencies</li> </ul> <p><i>Anonymized / De-identified Data:</i> Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws</p>
Employment and Apprenticeship Candidates	<p><i>Identity and Contact Information, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name or unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> <li>• employer/company</li> <li>• email address</li> <li>• postal address</li> <li>• phone number</li> <li>• username or code and password, security answers, and user preferences</li> <li>• contact information for related persons, such as authorized users of your account or designated representatives</li> <li>• National Provider Identifier (NPI) number</li> <li>• Social Security Number (SSN)</li> <li>• signature</li> </ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Age</li> <li>• Preferred language</li> <li>• gender</li> <li>• marital status</li> <li>• disability</li> <li>• ethnicity</li> <li>• date of birth</li> </ul> <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Internet Protocol (IP) addresses (which may identify your general geographic location or company)</li> <li>• browser type and browser language</li> <li>• device type</li> </ul>

	<ul style="list-style-type: none"> <li>• advertising IDs associated with your device (such as Apple’s Identifier for Advertising (IDFA) or Android’s Advertising ID (AAID))</li> <li>• date and time you use our Products and Services</li> <li>• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Products and Services</li> <li>• activity and online behavior while on our Products and Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages, and product descriptions read</li> <li>• data collected from cookies or other similar technologies geolocation information</li> </ul> <p><i>Professional and Educational Information, such as:</i></p> <ul style="list-style-type: none"> <li>• job title or position</li> <li>• your employer, company with which you are associated, or principal</li> <li>• working location</li> <li>• National Provider Identifier (NPI) number</li> <li>• State medical license number</li> <li>• work skills</li> <li>• employment history</li> <li>• graduate degrees</li> <li>• certifications</li> <li>• professional memberships</li> <li>• specialized training</li> <li>• responses to surveys and questionnaires</li> <li>• information from references</li> <li>• background checks</li> </ul> <p><i>Anonymized / De-identified Data:</i> Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws.</p>
Business Partners and Their Employees, Agents, and Contractors	<p><i>Identity and Contact Information, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name or unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> <li>• employer/company</li> <li>• email address</li> <li>• postal address</li> <li>• phone number</li> <li>• username or code and password, security answers, and user preferences</li> <li>• customer number</li> <li>• company ID number such as account number</li> <li>• National Provider Identifier (NPI) number</li> <li>• signature</li> </ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"> <li>• age</li> <li>• gender</li> </ul>

- marital status
- preferred language
- disability
- date of birth

*Technical information, such as:*

- Internet Protocol (IP) addresses (which may identify your general geographic location or company)
- browser type and browser language
- device type advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID))
- date and time you use our Products and Services
- Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Products and Services
- activity and online behavior while on our Products and Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages, and product descriptions read
- data collected from cookies or other similar technologies
- geolocation information

*Commercial and Financial Information, such as:*

- Products and Services purchased, obtained, or considered
- request documentation
- customer service records
- financial transaction history
- financial account number
- bank account number and details
- other payment information
- tax identification number

*Professional and Educational Information, such as:*

- job title or position
- your employer, company with which you are associated, or principal working location
- National Provider Identifier (NPI) number
- state medical license number
- work skills
- employment history
- graduate degrees
- certifications
- professional memberships
- specialized training
- responses to surveys and questionnaires
- enrollment and attendance history for our education and training events

	<ul style="list-style-type: none"> <li>• records of collaborations with Zimmer Biomet, such as consulting and other engagements</li> <li>• information from references</li> <li>• background checks</li> </ul> <p><i>Anonymized / De-identified Data</i> Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws.</p>
Attendees and Participants at Zimmer Biomet Events	<p><i>Identity and Contact Information, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name or unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> <li>• employer/company</li> <li>• email address</li> <li>• postal address</li> <li>• phone number</li> <li>• username or code and password, security answers, and user preferences</li> <li>• contact information for related persons, such as authorized users of your account or designated representatives</li> <li>• customer number</li> <li>• company ID number such as account number</li> <li>• National Provider Identifier (NPI) number</li> <li>• signature</li> </ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"> <li>• age</li> <li>• gender</li> <li>• marital status</li> <li>• preferred language</li> <li>• disability</li> <li>• date of birth</li> </ul> <p><i>Video, Audio, and Recorded Information, such as:</i></p> <ul style="list-style-type: none"> <li>• still images</li> <li>• video (including via CCTV)</li> </ul> <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Internet Protocol (IP) addresses (which may identify your general geographic location or company)</li> <li>• browser type and browser language</li> <li>• device type</li> <li>• advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID))</li> <li>• date and time you use our Products and Services</li> <li>• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Products and Services</li> <li>• Activity and online behavior while on our Products and Services and referring websites or applications including forms and other</li> </ul>

	<p>information submitted, videos watched, your clicks on our site pages, and product descriptions read</p> <ul style="list-style-type: none"> <li>• data collected from cookies or other similar technologies</li> <li>• geolocation information</li> </ul> <p><i>Commercial and Financial Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Products and Services purchased, obtained, or considered</li> <li>• bank account number and details</li> <li>• request documentation</li> <li>• financial transaction history</li> <li>• financial account number</li> <li>• other payment information</li> <li>• tax identification number</li> </ul> <p><i>Professional and Educational Information, such as:</i></p> <ul style="list-style-type: none"> <li>• job title or position</li> <li>• your employer, company with which you are associated or principal</li> <li>• working location</li> <li>• National Provider Identifier (NPI) number</li> <li>• State medical license number</li> <li>• work skills</li> <li>• employment history</li> <li>• graduate degrees</li> <li>• certifications</li> <li>• specialized training</li> <li>• responses to surveys and questionnaires</li> <li>• enrollment history for our education and training events</li> <li>• records of collaborations with Zimmer Biomet, such as consulting and other engagements</li> </ul> <p><i>Anonymized / De-identified Data:</i> Anonymized data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws.</p>
Clinical Investigators and Members of Investigator Teams	<p><i>Identity and Contact Information, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name or unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> <li>• employer / company</li> <li>• email address</li> <li>• postal address</li> <li>• phone number</li> <li>• username or code and password, security answers, and user preferences</li> <li>• contact information for related persons, such as authorized users of your account or designated representatives</li> <li>• customer number</li> <li>• company ID number such as account number</li> <li>• National Provider Identifier (NPI) number</li> <li>• Social Security Number (SSN)</li> </ul>

	<ul style="list-style-type: none"><li>• signature</li></ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"><li>• age</li><li>• gender</li><li>• preferred language</li><li>• disability</li><li>• date of birth</li></ul> <p><i>Visual, Audio, and Recorded Information, such as:</i></p> <ul style="list-style-type: none"><li>• still images</li><li>• video (including via CCTV)</li><li>• voicemails</li><li>• recordings of your interactions with our Online Services, whether through email, SMS/text message, or chat</li><li>• pictures and videos of treatment activities</li></ul> <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"><li>• Internet Protocol (IP) addresses (which may identify your general geographic location or company)</li><li>• browser type and browser language</li><li>• device type</li><li>• advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID))</li><li>• date and time you use our Products and Services</li><li>• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Products and Services</li><li>• activity and online behavior while on our Products and Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on Zimmer Biomet site pages, and product descriptions read</li><li>• data collected from cookies or other similar technologies</li><li>• geolocation information</li></ul> <p><i>Commercial and Financial Information, such as:</i></p> <ul style="list-style-type: none"><li>• bank account number and details</li><li>• customer service records</li><li>• financial transaction history</li><li>• financial account number</li><li>• other payment information</li></ul> <p><i>Professional and Educational Information, such as:</i></p> <ul style="list-style-type: none"><li>• job title or position</li><li>• your employer, company with which you are associated, or principal</li><li>• working location</li><li>• National Provider Identifier (NPI) number</li><li>• state medical license number</li></ul>
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	<ul style="list-style-type: none"> <li>• work skills</li> <li>• employment history</li> <li>• graduate degrees</li> <li>• certifications</li> <li>• specialized training</li> <li>• responses to surveys and questionnaires</li> <li>• enrollment history for our education and training events</li> <li>• records of collaborations with Zimmer Biomet, such as consulting and other engagements</li> <li>• information from references</li> <li>• background checks</li> </ul> <p><i>Product Usage Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Technical and surgical data (pre-, intra-, and post-operative) derived from your use of certain Products or Services</li> <li>• date and time you use our Products and Services, including the Products and Services used</li> </ul> <p><i>Anonymized / De-identified Data:</i> Anonymized and/or de-identified data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws.</p>
Clinical Study Candidates	<p>Identity and Contact Information, such as:</p> <ul style="list-style-type: none"> <li>• first and last name or unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> <li>• employer / company</li> <li>• email address</li> <li>• postal address</li> <li>• phone number</li> <li>• username or code and password, security answers, and user preferences</li> <li>• contact information for related persons, such as authorized users of your account or designated representatives</li> <li>• signature</li> </ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"> <li>• age</li> <li>• gender</li> <li>• preferred language</li> <li>• marital status</li> <li>• disability</li> <li>• ethnicity</li> <li>• date of birth</li> </ul> <p><i>Visual, Audio, and Recorded Information, such as:</i></p> <ul style="list-style-type: none"> <li>• still images</li> <li>• video (including via CCTV)</li> <li>• voicemails</li> </ul>

	<ul style="list-style-type: none"> <li>• recordings of your interactions with our Online Services, whether through email, SMS/text message, or chat</li> </ul> <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Internet Protocol (IP) addresses (which may identify your general geographic location or company)</li> <li>• browser type and browser language</li> <li>• device type</li> <li>• advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID))</li> <li>• date and time you use our Products and Services</li> <li>• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Products and Services</li> <li>• activity and online behavior while on Zimmer Biomet Products and Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages, and product descriptions read</li> <li>• data collected from cookies or other similar technologies</li> <li>• geolocation information</li> </ul> <p><i>Health Information, such as:</i></p> <ul style="list-style-type: none"> <li>• identification of pathologies/diseases</li> <li>• areas of interest in medical research</li> <li>• medical history and treatment information</li> <li>• drug allergies</li> <li>• health values taken, such as heart rate and blood pressure</li> <li>• pregnancy status</li> <li>• location data</li> </ul> <p><i>Commercial and Financial Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Products and Services purchased, obtained, or considered bank account number and details</li> <li>• request documentation</li> <li>• customer service records</li> <li>• financial transaction history</li> <li>• financial account number</li> <li>• other payment information</li> </ul> <p><i>Anonymized / De-identified Data:</i> Anonymized and/or de-identified data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws.</p>
Children	<p><i>Identity and Contact Information, such as:</i></p> <ul style="list-style-type: none"> <li>• first and last name or unique pseudonym</li> <li>• honorifics and titles, preferred form of address</li> </ul>

	<ul style="list-style-type: none"><li>• email address</li><li>• postal address</li><li>• phone number</li><li>• username or code and password, security answers, and user preferences</li><li>• contact information for related persons, such as authorized users of your account or designated representatives</li></ul> <p><i>Other Personal Information, such as:</i></p> <ul style="list-style-type: none"><li>• age</li><li>• gender</li><li>• preferred language</li><li>• disability</li><li>• ethnicity</li><li>• date of birth</li></ul> <p><i>Visual, Audio, and Recorded Information, such as:</i></p> <ul style="list-style-type: none"><li>• still images</li><li>• video (including via CCTV)</li><li>• recordings of your calls with our customer service representatives</li><li>• voicemails</li><li>• recordings of your interactions with our Online Services, whether through email, SMS/text message, or chat</li><li>• pictures and videos of treatment activities</li></ul> <p><i>Technical Information, such as:</i></p> <ul style="list-style-type: none"><li>• Internet Protocol (IP) addresses (which may identify your general geographic location or company)</li><li>• browser type and browser language</li><li>• device type</li><li>• advertising IDs associated with your device (such as Apple's Identifier for Advertising (IDFA) or Android's Advertising ID (AAID))</li><li>• date and time you use our Products and Services</li><li>• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving Zimmer Biomet Products and Services</li><li>• activity and online behavior while on our Products and Services and referring websites or applications, including forms and other information submitted, videos watched, your clicks on our site pages, and product descriptions read</li><li>• data collected from cookies or other similar technologies</li><li>• geolocation information</li></ul> <p><i>Health Information, such as:</i></p> <ul style="list-style-type: none"><li>• identification of pathologies/diseases</li></ul>
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	<ul style="list-style-type: none"> <li>• identification number associated with your Products</li> <li>• areas of interest in medical research</li> <li>• treatment dates</li> <li>• medical history and treatment information</li> <li>• patient-reported outcome measures (for example, responses to questionnaires and surveys about your health or treatment)</li> <li>• DICOM, X-rays, magnetic resonance imaging, and medical scans</li> <li>• user activity</li> <li>• therapy completion and use details</li> <li>• communications with your Healthcare Provider, including audio, video, or other recordings from telehealth sessions</li> <li>• drug allergies</li> <li>• prescriptions and dosing health values taken, such as heart rate and blood pressure</li> <li>• adverse event information</li> <li>• health insurance information and other information on payment for healthcare services</li> <li>• pregnancy status</li> <li>• contact information for designated recipients of your health information</li> <li>• location data</li> <li>• pictures and videos of treatment activities</li> <li>• patient ID number</li> </ul> <p><i>Commercial and Financial Information, such as:</i></p> <ul style="list-style-type: none"> <li>• Products and Services purchased, obtained, or considered</li> </ul> <p><i>Anonymized / De-identified Data:</i> Anonymized and/or de-identified data is data for which your individual personal characteristics have been removed such that you are not identified, and the information is no longer considered Personal Data under data protection laws.</p>
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9.3

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

<b>Category of personal information</b>	<b>Recipients or Categories of Recipients to whom the personal information may be supplied</b>
Identifying and Contact Information	affiliates, subsidiaries or related companies of Zimmer Biomet; any employer or company with whom the data subject is associated; any healthcare provider; any authorised representative of the data subject; and any person or entity designated or instructed by the data subject to receive such personal information

Health and Medical Information	healthcare providers; clinical investigators or member of an investigator team; ethics committees; and public authorities or governmental bodies
Employment Information	employers or prospective employers of the data subject; affiliates, subsidiaries or related companies of Zimmer Biomet; reference provided by the data subject; and third parties engaged to conduct background checks or verification processes
Patient-Related Information	healthcare providers; clinical investigators or investigator teams; ethics committees; and public authorities or governmental bodies
Event-Related Information	third parties attending, participating in, or involved in an event organised, sponsored or facilitated by Zimmer Biomet; affiliates, subsidiaries or related companies of Zimmer Biomet; and partners engaged to provide, administer or improve such events
Information shared on the basis of consent or instruction	individuals or entities expressly designated or instructed by the data subject to whom Zimmer Biomet is authorised to disclose the personal information
Family, Representative and Caregiver Information	authorised representatives, family members or caregivers of the data subject, to the extent necessary for the relevant purpose and permitted by law
Security, Fraud and Risk-Related Information	third parties engaged to assist with fraud prevention, detection or mitigation; and any third party engaged in loss-prevention or risk-management programmes
Information Technology and Systems Information	third parties engaged to provide information technology services, cybersecurity services, data hosting, or security-related support to Zimmer Biomet
Legal, Compliance and Governance Information	external legal advisors, auditors or professional consultants appointed by Zimmer Biomet
Marketing, Products and Services Information	partners, contractors or service providers engaged to assist Zimmer Biomet in providing, administering or improving its products or services, or in conducting marketing, communications or administrative functions
Clinical trial investigations	third parties engaged to assist Zimmer Biomet in identifying, assessing, selecting or appointing clinical trial investigators

#### 9.4 **Planned transborder flows of personal information**

9.4.1 Paragon 28 may collect and share personal and special personal information across jurisdictions in the ordinary course of providing its

offerings in which case Paragon 28 will fully comply with applicable data privacy and protection legislation. In particular, Paragon 28 may share personal and special personal information to countries listed in Annexe A. This may happen if the Paragon 28 servers or suppliers and service providers are based outside South Africa, or if the Paragon 28 services are hosted in systems or servers outside South Africa and/or if a data subject uses Paragon 28 services while visiting countries outside this area. These countries may not have data-protection laws which are similar to those of South Africa.

9.4.2 If Paragon 28 transfers personal information or special personal information outside of South Africa, Paragon 28 will make sure that the information is protected in the same way as if it was being used in South Africa. Paragon 28 will use one of the following safeguards:

9.4.2.1 transfer to another country whose privacy legislation ensures an adequate level of protection of personal information similar or equivalent to South Africa; and

9.4.2.2 put in place contracts with third parties ensuring that they protect personal and special personal information to the same standards as South Africa.

9.5 **A general description of information security measures to be implemented by Paragon 28 to ensure the confidentiality, integrity and availability of information**

Paragon 28 takes extensive information security measures to ensure the confidentiality, integrity and availability of personal and special personal information in our possession. Paragon 28 takes appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, misuse, unauthorised access, disclosure, alteration, destruction or damage.

10. **INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION**

10.1 Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation, if and to the extent applicable:

- *Administration of Estates Act 66 of 1965*

- *Basic Conditions of Employment Act 75 of 1997*
- *Close Corporations Act 69 of 1984*
- *Companies Act 71 of 2008*
- *Compensation for Occupational Injuries and Health Diseases Act 130 of 1993*
- *Competition Act 89 of 1998*
- *Consumer Protection Act 68 of 2008*
- *Employment Equity Act 55 of 1998*
- *Estate Agency Affairs Act 112 of 1976*
- *Income Tax Act 58 of 1962*
- *Insolvency Act 24 of 1936*
- *Labour Relations Act 66 of 1995*
- *Occupational Health & Safety Act 85 of 1993*
- *Patents Act 57 of 1978*
- *Pension Funds Act 24 of 1956*
- *Skills Development Act 97 of 1998*
- *Skills Development Levies Act 9 of 1999*
- *Stock Exchanges Control Amendment Act 54 of 1995 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)*
- *Trademarks Act 194 of 1993*
- *Unemployment Contributions Act 4 of 2002*
- *Unemployment Insurance Act 63 of 2001*
- *Value Added Tax Act 89 of 1991*

10.2 Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

10.3 It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

## 11. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST

11.1 Paragon 28 maintains records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured.

All requests for access will be evaluated on a case by case basis in accordance with the provisions of PAIA.

11.2 Please note further that many of the records held by Paragon 28 are those of third parties, such as clients and employees, and Paragon 28 takes the protection of third party confidential information very seriously. For further information on the grounds of refusal of access to a record please see paragraph 12.5 below. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

<b>Subject on which the body holds records</b>	<b>Category of Records</b>
<p><b>Internal records</b></p> <p>The records listed pertain to Paragon 28's own affairs</p>	<ul style="list-style-type: none"> <li>• Memoranda and Articles of Association</li> <li>• Financial records</li> <li>• Operational records</li> <li>• Intellectual property</li> <li>• Marketing records</li> <li>• Internal correspondence</li> <li>• Service records</li> <li>• Statutory records</li> <li>• Internal policies and procedures</li> <li>• Minutes of meetings.</li> </ul>
<p><b>Personnel records</b></p> <p>For the purposes of this section, "personnel" means any person who works for or provides services to or on behalf of Paragon 28 and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of Paragon 28. This includes partners, directors, all permanent, temporary and part-time staff as well as consultants and contract workers.</p>	<ul style="list-style-type: none"> <li>• Any personal records provided to us by our personnel</li> <li>• Any records a third party has provided to us about any of their personnel</li> <li>• Conditions of employment and other personnel-related contractual and quasi legal records</li> <li>• Employment policies and procedures</li> <li>• Internal evaluation and disciplinary records and</li> <li>• Other internal records and correspondence.</li> </ul>

<b>Client-related records</b>	<ul style="list-style-type: none"> <li>• Contracts with the client and between the client and other persons</li> </ul>
<p><b>Other third party records</b></p> <p>Records are kept in respect of other parties, including without limitation joint ventures and consortia to which Paragon 28 is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to Paragon 28.</p>	<ul style="list-style-type: none"> <li>• Personnel, client, or Paragon 28 records which are held by another party as opposed to being held by Paragon 28</li> <li>• Records held by Paragon 28 pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers</li> </ul>
<b>Supplier Information</b>	<ul style="list-style-type: none"> <li>• Contracts with suppliers</li> <li>• Records generated by or within the company pertaining to suppliers including transactional records</li> </ul>
<b>Information technology</b>	<ul style="list-style-type: none"> <li>• Business and data information</li> <li>• IT Technology capabilities</li> <li>• Systems and user manuals</li> </ul>
<b>Other records</b>	<ul style="list-style-type: none"> <li>• Information relating to Paragon 28 Research information belonging to Paragon 28 or carried out on behalf of a third party</li> </ul>

## 12. REQUEST PROCEDURE

### 12.1 Completion of the prescribed form

12.1.1 Any request for access to a record in terms of PAIA must substantially correspond with Form C of Annexure B to Government Notice No. R.187 dated 15 February 2002 (available on the website of the Regulator at <https://inforegulator.org.za/paia-forms/>) and should be specific in terms of the record requested.

12.1.2 A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.

- 12.1.3 POPIA provides that a data subject may, upon proof of identity, request Paragon 28 to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.
- 12.1.4 POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, Paragon 28 must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.
- 12.1.5 Grounds for refusal of the data subject's request are set out in chapter 4 of PAIA and are discussed below.
- 12.1.6 POPIA provides that a data subject may object, at any time, to the processing of personal information by Paragon 28, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form (available on the website of the Regulator at <https://info regulator.org.za/paia-forms/>) and submit it to the Information Officer via the following webform: [Privacy Request Form](#)..
- 12.1.7 A data subject may also request Paragon 28 to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that Paragon 28 is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- 12.1.8 A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer via the following webform: [Privacy Request Form](#), using the prescribed form available on the website of the Regulator at <https://info regulator.org.za/paia-forms/>.

## 12.2 **Proof of identity**

Proof of identity is required to authenticate your identity and the request. You will, in addition to the prescribed form, be required to submit acceptable proof

of identity such as a certified copy of your identity document or other legal forms of identity.

### 12.3 **Payment of the prescribed fees**

12.3.1 A requester who seeks access to a record containing Personal Information must pay the required access fee.

12.3.2 The Information Officer must by notice, require the requester to pay the prescribed fee, if any, before further processing the request.

12.3.3 The requester may lodge an application to the High Court relating to the payment of the access fee.

12.3.4 After the Information Officer has decided on the request, the requester will be notified in the required form.

12.3.5 If the request is granted, a further access fee must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.

12.3.6 A fee for a copy of this Manual, shall be payable per each A4-size photocopy made. The prescribed fees are available from the Information Officer, from the Regulator and set out in Annexe B attached hereto.

### 12.4 **Timelines for consideration of a request for access**

12.4.1 Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

12.4.2 Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

### 12.5 **Grounds for refusal of access to records and protection of information**

12.5.1 There are various grounds upon which a request for access to a record may be refused. These grounds include:

- the mandatory protection of personal information of a third person (who is a natural person) from unreasonable disclosure, including a deceased individual;
- the mandatory protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or

technical information that may harm the commercial or financial interests of a third party);

- if disclosure would result in the breach of a duty of confidence owed to a third party;
- if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- if the record was produced during legal proceedings, unless that legal privilege has been waived;
- if the record contains trade secrets, financial or sensitive information or any information that would put Paragon 28 (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
- if the record contains information about research being carried out or about to be carried out on behalf of a third party or by Paragon 28.

12.5.2 Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

12.5.3 If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty one) days of receipt of the request. The third party would then have a further 21 (twenty one) days to make representations and/or submissions regarding the granting of access to the record.

### 13. **REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS**

13.1 If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.

13.2 There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. In the event that you are not satisfied with the outcome of the request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

13.3 Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has

30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

#### 14. AVAILABILITY OF THIS MANUAL

14.1 A copy of the Manual is available:

14.1.1 on Paragon 28's website at : <https://www.zimmerbiomet.eu/en/privacy-notice>;

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

14.1.3 to the Regulator upon request.

14.2 A fee for a copy of the Manual, as contemplated in the Regulations, shall be payable per each photocopy made.

#### 15. UPDATING OF THE MANUAL

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

##### ***Issued by***

Signed by:

*Marvin Shaw*

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Name: **Marvin R. Shaw**

Position: **Senior Manager Commercial Operations MEA  
Information Officer**

**TRANSBORDER COUNTRIES**

1. Australia
2. Austria
3. Belgium
4. Brazil
5. Canada
6. Chile
7. China
8. Colombia
9. Costa Rica
10. Czech Republic
11. Denmark
12. Finland
13. France
14. Germany
15. Greece
16. Hong Kong
17. India
18. Ireland
19. Israel
20. Italy
21. Japan
22. Malaysia

23. Mexico
24. Netherlands
25. Norway
26. Poland
27. Portugal
28. Puerto Rico
29. Romania
30. Russia
31. Saudi Arabia
32. Singapore
33. Slovakia
34. South Africa
35. South Korea
36. Spain
37. Sweden
38. Switzerland
39. Taiwan
40. Thailand
41. Turkey
42. United Arab Emirates
43. United Kingdom
44. United States
45. Vietnam

## Annexe B

## FEES IN RESPECT OF PRIVATE BODIES

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.
Item	Description	Amount
4.	For a copy in a computer-readable form on: Flash drive (to be provided by the requestor) Compact disc (if provided by the requestor) Compact disc (if provided to the requestor)	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. It will depend on a quotation from the 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: Flash drive (to be provided by the requestor) Compact disc Flash drive (to be provided to the requestor) Compact disc	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. The search and preparation fee cannot exceed.	R145.00 R435.00
10.	Deposit: If the search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail, or any other electronic transfer	Actual expense, if any.