TheraLog PAIA Manual

BillingMed (Pty) Ltd t/a TheraLog · Version 1.0 · Last updated 4 November 2026

This manual, required by section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), explains what records BillingMed (Pty) Ltd, trading as TheraLog, holds and how to request access to them.

1. Company and contact details

BillingMed (Pty) Ltd is a private company that provides TheraLog, a practice-management platform for healthcare practitioners in South Africa.

Detail	
Registered name	BillingMed (Pty) Ltd
Trading name	TheraLog
Registration number	2025/036777/07
Head of the private body	Kagiso Ditabo
Information Officer	Kagiso Ditabo
Email for PAIA and POPIA requests	privacy@theralog.co.za
Website	theralog.co.za
Postal address	1 Black Thorn Road, Theresapark, 0182
Physical address	1 Black Thorn Road, Theresapark, 0182 (same as postal)
Telephone	*0616164884*

2. The Information Regulator's guide

The Information Regulator publishes a guide, under section 10 of PAIA, on how to use PAIA and POPIA to get access to records. It is available in all official languages on the Regulator's website and from its offices.

Information Regulator	
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg

Information Regulator	
Telephone	010 023 5200
Toll-free	0800 017 160
General enquiries	enquiries@inforegulator.org.za
Website	inforegulator.org.za

3. Records available without a request

These records are freely available on the website or from the Information Officer, with no PAIA request or fee:

- Terms of Service
- Privacy Policy
- Operator Agreement (version 1.1, effective 4 November 2026), including its list of sub-operators
- This PAIA manual
- Product and pricing information on theralog.co.za

4. Records kept under other laws

TheraLog keeps records under these laws, where they apply to it. Some are available to the public under the law itself; others only through a PAIA request.

Law	Records
Companies Act 71 of 2008	Memorandum of incorporation, registers of directors and shareholders, minutes, annual financial statements
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Tax returns, invoices, accounting records
Value-Added Tax Act 89 of 1991	VAT records, if TheraLog is registered for VAT
Basic Conditions of Employment Act 75 of 1997	Employee contracts, time and pay records
Labour Relations Act 66 of 1995	Disciplinary and dispute records
Employment Equity Act 55 of 1998	Employment equity records, if applicable

Law	Records
Unemployment Insurance Act 63 of 2001	UIF contributions and employee records
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Injury and incident records
Protection of Personal Information Act 4 of 2013	Records of processing, consents, data subject requests, security compromises
Electronic Communications and Transactions Act 25 of 2002	Records of electronic agreements and acceptances
Consumer Protection Act 68 of 2008	Customer agreements and complaints

5. Records TheraLog holds

Patient records belong to the practice, not to TheraLog. TheraLog stores them as an operator on the practice's behalf. A patient who wants their own records must ask their practitioner, who is the responsible party. TheraLog cannot read clinical note content, which is encrypted on the practitioner's device. A request for patient records sent to TheraLog is referred to the practice.

Subject	Categories of records
Company	Incorporation documents, registers, minutes, agreements, policies
Finance and tax	Accounting records, invoices, bank records, tax and VAT records
Customers (practices)	Accounts, practitioner and practice details, subscriptions and payments, support correspondence, acceptance of the Operator Agreement
Patient data (held for practices)	Patient details, clinical notes, documents, letters, appointments, consent records, invoices, session recordings until deleted
Suppliers and sub-operators	Contracts, data-processing terms, correspondence
Employees and contractors	Contracts, pay, leave, tax and UIF records
Information technology	System logs, audit logs, security records, backups

Subject	Categories of records
Marketing	Website analytics on the sign-up page, communication preferences

6. Processing of personal information (POPIA)

TheraLog processes personal information to provide its practice-management platform, to run the business, and to meet its legal duties.

Data subjects	Personal information	Purpose	TheraLog's role
Practitioners and practice staff	Name, email, practice name and number, speciality, login and security records, billing details	Accounts, access, billing, support, service emails	Responsible party
Patients of practices	Identity and contact details, medical-aid details, health information, clinical notes, documents, session recordings and transcripts	Providing the platform to the practice	Operator for the practice
Visitors to the sign-up page	Device and browsing information, through analytics and advertising tags	Measuring sign-ups	Responsible party
Suppliers and employees	Contact, contract, bank and tax details	Contracts, payments, legal duties	Responsible party

Recipients. Personal information is shared only with these sub-operators, under data-processing terms, and when the law requires it:

Sub-operator	Purpose	Location
Domains.co.za	Application and database hosting	South Africa
PayFast (Pty) Ltd	Subscription payments	South Africa

Sub-operator	Purpose	Location
Google (Google Cloud Vertex AI)	AI transcription and note drafting	European Union
Cloudflare, Inc. (R2)	Storage of documents, letters, recordings, transcripts and backups	United States
Cloudflare, Inc. (Turnstile)	Bot protection on sign-up	United States
Maileroo Group Pty Ltd	Email delivery	Australia (EU data centres)
Functional Software, Inc. (Sentry)	Error monitoring, with personal information filtered out	United States

Cross-border transfers. Information sent outside South Africa goes only to recipients bound by laws or agreements that protect it as POPIA section 72 requires.

Security. Measures include encryption of clinical notes on the practitioner's device, encryption in transit and at rest, access control with one-time passwords and passkeys, audit logs, automatic deletion of session recordings within 24 hours, and encrypted, tested backups. Schedule A of the Operator Agreement lists them in full.

7. How to request a record

TheraLog decides a request within 30 days of receiving it.

1. Complete **Form 2** (Request for access to a record, regulation 7 of the PAIA Regulations), available from the Regulator's website or the Information Officer.
2. Describe the record clearly, say how you want access (copy, inspection or electronic), and say which right the record is needed to exercise or protect (PAIA section 53).
3. Attach a copy of your identity document. If you ask on someone else's behalf, attach proof of your authority.
4. Email the form to privacy@theralog.co.za. There is no request fee (part 8 below).
5. TheraLog tells you its decision within 30 days. It may extend this once, by up to 30 days, and will tell you why (section 57). No answer in time counts as a refusal (section 58).
6. If the record concerns a third party, TheraLog notifies them and considers what they say before deciding (sections 71 to 74).

To correct or delete your own personal information, use Form 2 of the POPIA Regulations (request for correction or deletion), sent to the same email address. Requests about patient records are referred to the patient's practice (part 5 above).

8. Fees

TheraLog does not charge a request fee. Access is free in most cases.

For a request that needs substantial search or preparation time, or many copies, TheraLog may charge the access fees prescribed for private bodies in Annexure B of the PAIA Regulations, 2021, published free on the Information Regulator's private body fees page. Examples are R2.00 per black-and-white A4 page, and the prescribed hourly rate for search and preparation. TheraLog will tell you the amount, using Form 3, before doing the work.

9. Grounds for refusal and remedies

TheraLog may refuse a request only on the grounds in Chapter 4 of Part 3 of PAIA, and gives written reasons when it does.

Ground	PAIA section
Unreasonable disclosure of a third party's personal information	63
A third party's commercial information	64
A third party's confidential information	65
Safety of individuals and protection of property	66
Records privileged from production in legal proceedings	67
TheraLog's own commercial information, such as trade secrets and security measures	68
Research information of TheraLog or a third party	69

These grounds do not apply where disclosure would reveal a serious breach of law or an imminent public-safety risk, and the public interest clearly outweighs the harm (section 70).

Remedies. A private body has no internal appeal. If you are unhappy with a decision, a fee or an extension, you may, within 180 days:

- complain to the Information Regulator, using Form 5 (sections 77A and 77B), or
- apply to court (section 78).

10. Availability and updates

This manual is published on theralog.co.za and is available free of charge from the Information Officer by email. TheraLog updates it whenever the information in it changes, and reviews it at least once a year. A copy is given to the Information Regulator on request.

References

- Promotion of Access to Information Act 2 of 2000, sections 51 to 78
- Protection of Personal Information Act 4 of 2013, sections 18, 23, 24, 51 and 72
- PAIA Regulations, 2021: Forms 2, 3 and 5, and Annexure B (fees), on the Information Regulator's PAIA forms and private body fees pages
- Information Regulator: guide, forms, fee table and contact details