

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Compiled in accordance with the requirements of the
Promotion of Access to Information Act No. 2 of 2000

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WHEREBY IT IS AGREED AS FOLLOWS:

INTERPRETATION

1.1. Unless otherwise expressly stated, or the context otherwise requires, the words and expressions listed below will, when used in this Agreement, bear the meanings ascribed to them, and cognate words and expressions will bear the corresponding meanings:

1.1.1. Company: LeadFund Holdings (Pty) Ltd

1.1.2. Data Subject: Shall have the meaning ascribed to it in Chapter 1 of POPIA.

1.1.3. Personal Information: shall have the meaning ascribed to it in Chapter 1 of POPIA

1.1.4. PAIA: means the Promotion of Access to Information Act 2 of 2000 as amended.

1.1.5. PAIA Manual means this manual together with all its annexures, as amended from time to time.

1.1.6. POPIA: means the Protection of Personal Information Act 4 of 2013, as amended.

1.1.7. Processing: shall have the meaning ascribed to it in Chapter 1 of POPIA

1.1.8. Responsible Party: Shall have the meaning ascribed to it in Chapter 1 of POPIA

1.1.9. The Act: The Promotion of Access to Information Act No 2 of 2000, as amended, and its accompanying regulations

1.2. The following annexures form part of this PAIA Manual:

1.2.1. Annexure A – Request for Access to Record

Reference to any information in this manual, in addition to that specifically required in terms of Section 51 of the Act, does not create any right or entitlement to receive such information, other than in terms of the Act.

1.3. In this PAIA Manual:

1.3.1. Clause and paragraph headings are for purposes of reference only and will not be used in interpretation.

1.3.2. Any reference to any statute, regulation, or legislation is a reference to such statute, regulation, or legislation as at the date of signature hereof and as amended from time to time

1.3.3. A reference to a business day is a reference to any day excluding Saturday, Sunday, and a public holiday in the Republic of South Africa

INTRODUCTION

1.4. The Company/Companies conducts business as a privately owned financial institution that provides alternative funding to businesses to normal commercial banks within South Africa

1.5. This PAIA Manual provides an outline of the type of records and the Personal Information it holds and explains how to submit requests for access to these records in terms of PAIA. In addition, it explains how to access, or object to, Personal Information held by the Company/Companies, or request correction of the Personal Information, in terms of Sections 23 and 24 of POPIA.

1.6. PAIA and POPIA give effect to the constitutional right of access to information held by private sector or public bodies, if the record or Personal Information is required for

the exercise of protection of any rights. If a public body lodges a request, the public must be acting in the public interest.

1.7. Requests shall be made in accordance with the prescribed procedures, at the rates provided. The form and tariffs associated with such requests are set out in paragraph 5 below.

1.8. This PAIA Manual is published on the Company website at www.leadfundcapital.co.za, or a copy can be requested from the Information Officer or Deputy Information Officer. The PAIA Manual is also available to view at the premises of the Company situated at Hyde Park Lane, Craighall, Sandton, 2196.

CONTACT DETAILS OF THE CHIEF EXECUTIVE OFFICER (Section 51(1)(A))

PAIA prescribed the appointment of an Information Officer for public bodies where such an Information Officer is responsible for, inter alia, assessing requests for access to information.

The Head of a Private Body fulfils such a function in terms of section 51 of PAIA. The Information Officer appointed in terms of PAIA also refers to the Information Officer as required by POPIA.

The Information Officer oversees the functions and responsibilities as required in terms of both PAIA as well as the duties and responsibilities in terms of Section 55 of POPIA after registering with the Information Regulator.

The Information Officer may appoint, where it is deemed necessary, Deputy Officers, as allowed in terms of Section 17 of PAIA as well as Section 56 of POPIA. This is in order to render the Company/Companies as accessible as reasonably possible for anyone who requests access to the records of the Company/Companies and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of Section 55 of POPIA.

The Information Officer may be contacted or reached on the following details:

1.9. Cheyne Ritchie

- 1.10. Registered Address: Hyde Park Lane, Craighall, Sandton, 2196.
- 1.11. Telephone Number: 084 344 0328
- 1.12. Website: <https://leadfundcapital.co.za/>

SECTION 10 GUIDE TO THE ACT

The act grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. If a public body lodges a request for access to information with the Company, the public body must be acting in the public interest.

Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided and gazetted by the Minister from time to time. The applicable forms and tariffs are specified in the Act.

The Information Regulator has, in terms of section 10(1) of PAIA, as amended, updated the PAIA Guide, as initially compiled by the SAHRC. The purpose of the Guide is to provide information that is needed by any person who wishes to exercise any right contemplated in PAIA and POPIA.

This guide will specifically assist a person, also referred to as a data subject, on how to access their personal information in accordance with Section 23 of POPIA.

Requesters are referred to the Section 10 Guide, which contains information that will assist them in exercising their Constitutional Rights.

RECORDS AVAILABLE ONLY ON REQUEST TO ACCESS IN TERMS OF SECTION 51(1)(D) OF PAIA

- 1.13. Records held by the Company/Companies

1.13.1. This paragraph serves as a reference to the categories of information that the Company/Companies holds. The information is classified and grouped according to records relating to the following subjects and categories:

1.13.1.1. Personnel Records

- 1.13.1.1.1. Personal records provided by personnel
- 1.13.1.1.2. Records provided by a third party relating to personnel
- 1.13.1.1.3. Conditions of employment and other personnel-related contractual and quasi-legal records
- 1.13.1.1.4. Internal evaluation records and other internal records
- 1.13.1.1.5. Correspondence relating to personnel; and
- 1.13.1.1.6. Training Scheduled and Material
- 1.13.1.1.7. For clause 5.1.1.1, “personnel” refers to any person who works for or provides services to or on behalf of the Company/Companies, and receives or is entitled to receive remuneration, and any other person who assists in carrying out or conducting the business of the Company/Companies. This includes, without limitation, directors (executive and non-executive), all permanent, temporary, and part-time staff, as well as contract workers

1.13.1.2. Customer Related Records

- 1.13.1.2.1. Records provided by a customer to the Company/Companies
- 1.13.1.2.2. Records provided by a third party
- 1.13.1.2.3. Records generated by or within the Company/Companies relating to its customers, including, but not limited to, transactional records; and
- 1.13.1.2.4. For clause 5.1.1.2, a “customer” refers to any natural or juristic entity that received goods and/or services from the Company/Companies

1.13.1.3. Private Body Records

- 1.13.1.3.1. Financial Records
- 1.13.1.3.2. Operational Records
- 1.13.1.3.3. Databases

- 1.13.1.3.4. Information Technology; and
- 1.13.1.3.5. Marketing records
- 1.13.1.4. Internal Correspondence
 - 1.13.1.4.1. Product records
 - 1.13.1.4.2. Statutory records
 - 1.13.1.4.3. Internal policies and procedures
 - 1.13.1.4.4. These records include, but are not limited to, records which pertain to the Company/Companies' own affairs

1.14. Note that the accessibility of records may be subject to the grounds of refusal set out in this PAIA Manual. Amongst others, records deemed confidential on the part of a third party will necessitate permission from the third party concerned, in addition to normal requirements, before the Company/Companies will consider access.

RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF PAIA

- 1.15.** Records of public nature, typically those disclosed on the Company website and its various annual reports, may be accessed without the need to submit a formal application
- 1.16.** Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application; however, please note that an appointment to view such records will still have to be made with the Information Officer

RECORDS OF THE FIRM WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

1.17. Where applicable to its operations, the Company/Companies also retains records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of PAIA, the below mentioned legislation, and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be made in accordance with the prescribed manner in PAIA.

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
• Client personal information • Opinions/Advice to clients • Correspondence with clients • Records regarding legal matters • Correspondence with third parties and legal practitioners	• Administration of Estates Act 66 of 1965 • Copyright Act 98 of 1978 • Information Act 70 of 2002 • Intellectual Property Amendment Act 28 of 2013 • Insolvency Act 24 of 1936 • Protection of Personal Information Act 2013 and the Promotion of Access of Information Act 2 of 2000 • Trust Property Control Act 57 of 1988
Employee data from previous employment, personal information	• Basic Conditions of Employment Act 75 of 1997

	• Compensation for Occupational Injuries and Diseases Act 130 of 1993, Consumer Protection Act 68 of 2008 • Employment Equity Act 55 of 1998 • Electronic Communications and Transactions Act 25 of 2002 • Financial Intelligence Centre Act 38 of 2001 • Income Tax Act 58 of 1962 • Information Act 70 of 2002
Client Personal data, employee personal data, supplier data, charity recipient data	Broad-Based Black Economic Empowerment Act 53 of 2003, Companies Act 71 of 2008

REQUEST PROCEDURE

To enable the Company/Companies to process a request for access to information, kindly complete the prescribed Annexure A Request for Access to Record (Regulation 7)

The requester must comply with the guidelines set out below, which have been set out in line with the requirements of the PAIA Act, relating to the request for records:

The request must be submitted in the format of **Form 02** as required and submitted to the Company/Companies at the contact details outlined in paragraph 3 above. All requests for records made by a requester will be assisted by the Information Officer or the Deputy Information Officer.

The prescribed form must be completed in detail to provide clear, sufficient, and unambiguous details to enable the Company/Companies to ascertain

- The identity of the requester (If the requester is represented by an agent, sufficient proof showing authority to represent the requester and the identity of the agent)
- The record/s requested
- The right which the requester is seeking to exercise or protect, with an explanation of the reason the record is required to exercise or protect the right, as contemplated in Section 53(2)(d) of PAIA.
- The form of access required
- If the requester wishes to be informed of the decision in any manner (in addition to a written decision), the manner and particulars thereof
- The postal address of the requester in the Republic
- The request for access to information must be clearly identified as such and marked for the attention of the Information Officer; and
- The applicable prescribed fee as set out in the regulations to the Act must accompany the request for access to information.

The request for access to records may be submitted orally under the circumstances of illiteracy or a disability of the requester. The completion of **Form 2** will be done on behalf of the requester, and a copy thereof will be sent to the requester

Access to records will only be considered after the above checks are done; thereafter, the Company/Companies will respond to the requester within 30 days with a copy of the requested record or the reason/s of grounds for refusal.

The above 30-day timeline may be extended for a further 30 days, should such a circumstance arise that an extension is needed. The requester will be notified, together with the reasons explaining why the extension is necessary, before the original 30 days expires.

Upon due lodgement of a request for access to information lodged with the Company/Companies, the Company/Companies will consider the request and notify the requester of its decision by way of a written notice within the time periods stipulated in the Act, stating clearly whether the request is granted or refused, and advising the requester of

external remedies which the requester may pursue to dispute the Information Officer's decision

The result and amount payable (if applicable) will then be communicated in Annexure B-Form 3 – outcome of request and of fees payable (Regulation 8)

GROUND FOR REFUSAL

1.18. The Company/Companies has a right to refuse access to records which a requester has requested on the following grounds:

1.18.1. Mandatory protection of the privacy of a third party who is a natural person or deceased person (section 63) or a juristic person, as included in POPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person

1.18.2. Mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory, or contractual agreements, comply with the provisions of POPIA

1.18.3. Mandatory protection of the commercial information of a third party (section 64), if the records contain:

1.18.3.1. Trade secrets of the third party

1.18.3.2. Financial, commercial, scientific, or technical information whose disclosure could likely cause harm to the financial or commercial interests of that third party

1.18.3.3. Information disclosed in confidence by a third party to the Company/Companies, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition

1.18.4. Mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement

1.18.5. Mandatory protection of the safety of individuals and the protection of property (section 66)

- 1.18.6. Mandatory protection of records which would be regarded as privileged in legal proceedings (Section 67)
- 1.19.** The commercial activities (Section 68) of a Private Body, such as the Company/Companies, which may include –
- 1.19.1. Trade secrets of the Company/Companies
- 1.19.2. Financial, commercial, scientific, or technical information whose disclosure could likely cause harm to the financial or commercial interests of the Company/Companies
- 1.19.3. Information which, if disclosed, could put the Company/Companies at a disadvantage in negotiations or commercial competition
- 1.19.4. A computer program which is owned by the Company/Companies, and which is protected by copyright
- 1.19.5. The research information (Section 69) of the Company/Companies or a third party, if its disclosure would disclose the identity of the Company/Companies, the researcher, or the subject matter of the research, and would place the research at a serious disadvantage
- 1.20.** Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources, shall be refused
- 1.21.** All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.
- 1.22.** If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the records concerned for PAIA. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such a record
- 1.23.** Where the Company/Companies were unable to disclose any certain part of the information because of the above Grounds of Refusal, any other information that is not part of the Ground of Refusal must be disclosed.

1.24. Section 70 of PAIA contains an overriding provision where disclosure of a record is deemed to be compulsory if it would reveal

1.24.1. A substantial part of, or failure to comply with the law; or

1.24.2. There is an imminent and serious public safety or environmental risk;
and

1.24.3. The public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

REMEDIES AVAILABLE WHEN THE COMPANY/COMPANIES REFUSE A REQUEST

1.25. Internal Remedies

The Company/Companies does not have an internal appeal procedure. The decision made by the Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requester is not satisfied with the answer supplied by the Information Officer.

1.26. External Remedies

1.26.1. A requester that is dissatisfied with the Information Officer's refusal to disclose information may, within 30 days of notification of the decision, apply to a Court for relief

1.26.2. A third party dissatisfied with the Information Officer's decision to grant a request for information may, within 30 days of notification, apply for court relief

1.27. For purposes of PAIA, the courts that have jurisdiction over these applications are the Constitutional Court, the High Court, or another court of similar status, and a

Magistrate's Court designated by the Minister of Justice and Constitutional Development, and which is presided over by a designated Magistrate

OTHER INFORMATION AS MAY BE PRESCRIBED IN TERMS OF THE ACT

1.28. Information requested about a third party

Where any information relating to a third party is requested from the Company/Companies by a requester, the Company/Companies will notify the third party of the request.

The third party will have an opportunity to grant his, her, or its consent to the disclosure of the record or to make representations as to why the requested record should not be disclosed to the requester.

Where the Company/Companies decides to grant access to the record, it will notify all affected third parties who will be entitled to approach a competent court by way of application in relation to such decision.

ACCESS TO RECORDS HELD BY THE COMPANY/COMPANIES

1.29. Prerequisites for Access by Personal/Other Requester

1.29.1. Records held by the Company/Companies may be accessed by requests only once the prerequisite requirements for access have been met

1.29.2. A requester is any person requesting access to a record of the Company/Companies. The two types of requesters are more fully described below.

1.29.3. Personal Requester

1.29.3.1. A personal requester is a requester who is seeking access to a record containing personal information about the requester

1.29.3.2. The Company/Companies will voluntarily provide the requested information or give access to any record concerning the requester's personal information. The prescribed fee for the reproduction of the information requested will be charged

1.29.4. Other Requester

1.29.4.1. This requester (other than a personal requester) is entitled to request access to information on third parties

1.29.4.2. In considering such a request, the Company/Companies will adhere to the provisions of PAIA. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing them that they may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the information

1.29.4.3. The Company/Companies is not obliged to voluntarily grant access to such records. The requester must fulfil the prerequisite requirements, in accordance with the requirements of PAIA and as stipulated in the act.

FEES PROVIDED BY PAIA

1.30. PAIA provides for two types of fees, which are –

1.30.1. A non-refundable request fee, which is an administration fee to be paid by all requesters except personal requesters, before the request is considered; and

1.30.2. An access fee, which is paid by all the requesters if an access request is granted. This fee is inclusive of costs incurred by the Company/Companies in obtaining and preparing a record for delivery to the requester.

1.31. When the request is received by the Information Officer, such officer shall, by notice, require the requester, other than a personal requester, to pay the prescribed

fee, before further processing of the request, in accordance with Section 54(1) of PAIA.

- 1.32.** If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay, as a deposit, the prescribed portion of the access fee which would be payable if the request is granted.
- 1.33.** The Information Officer shall withhold a record until the requester has paid the fees as indicated below
- 1.34.** A requester whose request for access to a record has been granted must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in request form
- 1.35.** If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer must repay the deposit to the requester.

FEES PAYABLE

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.
4.	For a copy in a computer-readable form on: (iii) Flash drive (to be provided by requestor) (iv) Compact disc • If provided by requestor • 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. Will depend on quotation from 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: (v) Flash drive (to be provided by requestor) (vi) Compact disc • If provided by requestor • If provided to the requestor	R40.00 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. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If 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."

PROTECTION OF PERSONAL INFORMATION ACT, 2013

Insofar as the Protection of Personal Information Act, 2013, is concerned – BASIS AND PURPOSE FOR PROCESSING PERSONAL INFORMATION

The Company/Companies may process personal information:

- To provide services to clients
- To comply with legal or regulatory obligations
- Is a data subject has provided their consent; or
- If the processing is allowed by law

The purpose for which the Company/Companies processes personal information includes, but is not limited to:

- Marketing and promotion of the Company/Companies services
- Credit Risk Assessments
- Financial Due diligence
- Debtor Management
- Compliance with FICA
- Providing and improving services to clients
- Improving users' experience when using the Company/Companies website
- Communicating with persons for the Company/Companies' internal purposes
- Enabling the Company/Companies' internal operations
- Exercising and defending legal rights

Personal information will only be processed in accordance with the following POPIA conditions:

- "Accountability", as referred to in section 8
- "Processing limitation" as referred to in sections 9 to 12
- "Purpose specification" as referred to in sections 13 and 14
- "Further processing limitations" as referred to in section 15
- "Information quality" as referred to in section 16
- "Openness" as referred to in sections 17 and 18
- "Security safeguards" as referred to in sections 19 to 22; and
- "Data subject participation" as referred to in sections 23 to 25

CATEGORIES OF DATA SUBJECTS AND INFORMATION

The firm collects personal information in various instances, including when:

- Data subjects contact the firm or request information or services
- The Company/Companies provides services to the data subjects
- Persons apply for employment at the Company/Companies
- When persons use the Company/Companies website or engage with the Company or Companies' social media

The Company/Companies may collect the information directly from a data subject or from third parties (such as regulators, government authorities and registries, or at attorneys representing our clients' counterparties)

Interacting with the Company/Companies on their website will result in the collection of information regarding the person's activities on the website. Similarly, when anyone engages with the Company/Companies via any of their social media platforms. This information includes, but is not limited to, the person's name, contact details, and information regarding the matter with which they need assistance.

In the course of engaging with clients on matters, the Company/Companies will naturally be exposed to and collect personal information, as well as information regarding the matters that the Company/Companies assist them with.

As part of its recruitment processes, the Company/Companies collects information from graduates and employment applicants. This information includes educational information as well as employment history. By enquiring regarding employment opportunities at the Company/Companies or applying for employment, applicants are deemed to provide their consent to the Company/Companies' processing of their personal information for recruitment purposes, which may include screening as well as background and reference checks.

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
Customers/Clients/Debtors of clients/Directors of client companies/Beneficial Owners/Guarantors/Sureties	Name, address, ID, employment status, correspondence, banking details, financial and tax information, credit history, company registration details
Partners	Ownership details, partnership conditions and agreement, address, qualifications, gender, race, name, identity, personal information, including personal details, disciplinary records, performance and internal evaluation records, medical aid and life insurance, etc.
Employees	Employment details, payroll records, correspondence, address, qualifications, gender and race name, identity numbers, employment status, personnel information including personal details, disciplinary records, performance and internal evaluation records, medical aid and life insurance, pension etc.,
Service Providers/Vendors	Names, registration numbers, VAT numbers, address, correspondence, qualifications, contracts, bank details, financials

SUPPLY OF PERSONAL INFORMATION

The Company/Companies may release personal information or disclose it to third parties in certain circumstances. These include, but are not limited to:

- If the Company/Companies are required or authorised to do so by law or a court order
- For the Company/Companies to enforce its rights
- For the Company/Companies to provide services to its clients

The third parties/recipients or categories of recipients to whom the personal information may be supplied include, but are not limited to:

- Third-party service providers to the Company/Companies or its clients
- Government authorities and registries, organs of state, regulators, courts, tribunals, and law enforcement agencies, banks, auditors, legal advisors.

TRANSFER OF PERSONAL INFORMATION

Personal information collected by Company/Companies may be transferred to persons in other countries. Those countries' laws might not protect personal information in the same way or on the same level as the law in the data subject's country. However, the Company/Companies will take reasonable steps to ensure that the recipients in other countries have appropriate privacy measures in place to ensure that the necessary data transfer and protection are in place.

SECURITY

The Company/Companies takes all reasonable steps to protect and avoid unauthorised access to personal information. It has implemented various policies, procedures, and software to safeguard personal information and routinely reviews its operations to ensure that personal information is adequately protected.

Security controls have been implemented to minimise the risk of loss, unauthorised access, disclosure, interference, modification, or destruction of personal information.

Further, the Company/Companies employs appropriate, reasonable technical and organisational measures to prevent loss of, damage to, or unauthorised destruction of personal information and unlawful access to or processing of personal information. These information security measures include, but are not limited to, firewalls, virus protection, update protocols, access control, and others

The IT Department continuously reviews and tests the security controls to mitigate the risk of cyberattacks

In the event that there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, the Company/Companies will comply with the requirements of Section 22 of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013).

The Company/Companies will notify the Information Regulator and the affected data subject of any security compromise as soon as reasonably possible after becoming aware of it.

The notification will provide sufficient information to allow the data subject to take protective measures against the potential consequences of the compromise.

Where appropriate, the Company/Companies will take reasonable steps to identify the cause of the compromise and implement measures to prevent any recurrence.

DATA SUBJECT RIGHTS

The law might provide data subjects with rights to access, amend, or delete personal information that is in the possession of the Company/Companies. However, the Company/Companies may, in certain instances, legally refuse or decline such requests. If applicable, a data subject may also have the right to object to the Company/Companies'

processing of their personal information or to file a complaint with the regulator. If a data subject wishes to exercise their rights, they can contact the Company/Companies at the details provided. The Company/Companies may charge the data subject a fee for accessing, amending, or deleting their personal information.

Data subjects are encouraged to contact the Company/Companies to update their personal information as and when necessary.

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

Section 24 of POPIA and regulation 3 of the POPIA Regulations provide that a data subject may request that their personal information be corrected/deleted.

The data subject may use Annexure C to request the correction or deletion of their personal information. Once completed, the data subject is to follow the Request Procedure set out in Section 9 of this manual

A data subject, who wishes to request a correction or deletion of his, her or its personal information as provided for in section 24(1)(a) of the Act, has the right to request for correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

A data subject who wishes to request the destruction or deletion of a record of his, her or its personal information in terms with section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain in terms of section 14 of the Act

A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party, and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof, which shall be free of charge. As the Company/Companies does not utilise the recording of phone calls, the

Information Officer or Deputy Information Officer will complete the form on behalf of the requester and provide a copy thereof to the requester

The Company/Companies, as the responsible party, must, within 30 days of receipt of the outcome of the request, notify a data subject, in writing, of the action taken because of the request.

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION BY A DATA SUBJECT

Section 11(3) of POPIA and Regulation 2 of the POPIA Regulations provide that a data subject may, at any time, object to the processing of his/her/its personal information, subject to exceptions contained in POPIA.

The data subject may use the information in **Annexure D** to request this. Once completed, the data subject is to follow the Request Procedure set out in this manual

A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) and (b) of the Act must submit the objection to the Company/Companies at any time during office hours and free of charge.

In terms of Regulation 2 of the Act, if an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and, upon request, be made available to the data subject in any manner, including the transcription thereof, as the firm does not utilise the recording of phone calls, the Information Officer or the Deputy Information Officer will complete the form on behalf of the requester and provide a copy thereof to the requester.

AVAILABILITY AND UPDATING OF PAIA MANUAL

This PAIA manual is made available in terms of Regulation Number R.187 of 15 February 2002. The company/Companies will update this PAIA manual at such intervals as may be deemed necessary.

ANNEXURES

Annexure A: Request for Access to Record – Regulation 7

Annexure B: Outcome of Request and Fees Payable

Annexure C: Request for Correction or Deletion of Personal Information or Destroying Or Deletion of Record of Personal Information in Terms of Section 24(1) of the Protection of Personal Information Act, 2013 (Act No. 4 Of 2013)

Annexure D: Objection to the processing of Personal

FORM 2 REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests are made on behalf of another person, proof of such authorisation must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

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

Contact Numbers	Cellular:	
Full names of person on whose behalf request is made (if applicable):		
Identity Number		
Postal Address		

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	

Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester/person on whose behalf request is made

FOR OFFICIAL USE

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

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

- If your request is granted, the—
 - amount of the deposit (if any) is payable before your request is processed; and
 - the requested record/portion of the record will only be released once proof of full payment is received.
- Please use the reference number hereunder in all future correspondence.

Reference number:

TO:

Your request dated refers.

1. You requested:

Personal inspection of information at the registered address of a public/private body (*including listening to recorded words, information which can be reproduced in sound, or information held on a computer or in an electronic or machine-readable form*) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.

OR

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc.</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: (<i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i>)	

Kindly note that your request has

- ☐ been approved.
- ☐ been denied, for the following reason.

4. **Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
7 Flash drive.	R40.00		
7.1. To be provided by requestor			
8 Compact disc	R40.00		
8.1. If provided by requestor			
8.2. If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
9 To be provided by requestor			
(ii) Compact disc	R40.00		
9 If provided by requestor			
10 If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. **Deposit payable (if search exceeds six hours):**

☐ Yes

☐ No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid in the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR
DELETION OF RECORDS OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE
PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)**

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2021

[Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as applicable.*

Mark the appropriate box with an "x".

Request for:

- Correction or deletion of personal information about the data subject which is in possession or under the control of the responsible party.

Please select applicable reasons for the selected request:

- | | |
|-------------------------|--------------------------|
| 10. Inaccurate | ☐ |
| 11. Irrelevant | ☐ |
| 12. Excessive | ☐ |
| 13. Out of Date | ☐ |
| 14. Incomplete | ☐ |
| 15. Misleading | ☐ |
| 16. Obtained unlawfully | ☐ |

- Destruction ☐ or ☐ deletion of a record of personal information about the data subject, which is in the possession or under the control of the responsible party who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / Registered name of data subject:	
Postal or Business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered name of responsible party:	
Postal or Business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	PERSONAL INFORMATION TO BE CORRECTED/DESTROYED/DELETED <i>(Please specify the personal information required to be corrected/destroyed / deleted)</i>
D	EXPLANATION FOR THE SELECTED REASON FOR A REQUEST <i>(Please provide detail explanation for the selected reasons for the request for correction or deletion of personal information which is in possession or under the control of the responsible party</i>

Signed at this day of 20.....

.....

Signature of data subject/ designated person

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE
PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION,
2021 [Regulation
2]

Note:

1. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form.*
2. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(3)(a) (Please provide detailed reasons for the objection)

Signed at this day of..... 20.....
.....

Signature of data subject/designated person