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Document Approval

Action	Name	Designation
Prepared	Trudi Maré	Legal
Approved	Wayne Pollak	Chief Executive Officer

ACCESS TO INFORMATION MANUAL OF:
BIDVEST SERVICES (PTY) LTD T/A BIDVEST STEINER
(REGISTRATION NUMBER: 2000/011155/07)

Prepared in accordance with section 51 of the Promotion of Access to Information Act No. 2 of 2000, as amended by, and in order to address, the requirements of the Protection of Personal Information Act No. 4 of 2013.

1. INTRODUCTION

- 1.1 This *Manual* gives effect to *PAIA* and *POPIA*. Aforesaid legislation provides for the right of access to information held by a private body, such as the *Company*, that is required for the exercise or protection of a right.
- 1.2 *PAIA* commenced on 9 March 2001, which among other things:
 - 1.2.1 seeks to give effect to a person's *Constitutional* right of access to information (subject to certain limitations) and sets out the procedural process to follow to exercise or protect this right;
 - 1.2.2 sets out the obligation of private bodies to compile a *Manual*.
- 1.3 *POPIA* commenced on 1 July 2020 and gives effect to:
 - 1.3.1 a person's right to privacy, including the right to data privacy, and in accordance with this objective, describes and prescribes a series of conditions (i.e. minimum requirements) which must be met when *Personal Information* is *Processed*;
 - 1.3.2 amends certain provisions of *PAIA*, balancing the need for access to information against the need to ensure the protection of *Personal Information*.

2. PURPOSE

This *Manual*:

- 2.1 for purposes of *PAIA* details:
 - 2.1.1 the *Records* or categories of *Records* held or processed by the *Company* including those available without a person having to submit a formal *PAIA* request, those available in accordance with other legislation and those available on submission of a formal request;
 - 2.1.2 the procedure that a *Requester* for information is to follow, the requirements to be met and the manner in which a request for access will be facilitated by the *Company*;
- 2.2 for purposes of *POPIA* details:
 - 2.2.1 the purpose for which *Personal Information* may be processed;
 - 2.2.2 a description of the categories of *Data Subjects* whom the *Company* *Processes Personal Information* about, as well as the categories of *Personal Information* relating to such *Data Subjects*;
 - 2.2.3 the recipients to whom *Personal Information* may be supplied;
 - 2.2.4 any transfer or *Processing of Personal Information* cross-border or outside of the *RSA*;
 - 2.2.5 a general description of suitability of information security measures to ensure confidentiality, integrity and availability of information; and

- 2.3 is available in accordance with section 51(3) of PAIA:
- 2.3.1 for downloading, free of charge, on the *Company* website: <http://www.steiner.co.za>;
 - 2.3.2 for inspection, free of charge, at the *Company* principal place of business located at 110 Loper Avenue, Aeroport, Spartan Extension 2, Kempton Park, 1619 between 08:00 to 16:30, Monday to Friday (excluding public holidays);
 - 2.3.3 in hard copy format, subject to payment of a *Fee*, at the *Company* principal place of business referred to above and any of its branches between 08:00 to 16:30, Monday to Friday (excluding public holidays). Should a request for access in hard copy format be made, the *Requester* must complete Form 2 (Annexure "F"). A request for access must be made to the *Information Officer* in accordance with the procedure stipulated in paragraph 9 of this *Manual*.

3. DEFINITIONS AND INTERPRETATION

- 3.1 For purpose of this *Manual* an italicised word or phrase indicates that the word or phrase is defined in the glossary attached hereto as Annexure "A".
- 3.2 Should a court or statutory or regulatory body, authority or forum find this *Manual* (or any part thereof) to be unenforceable, any request for access, whether submitted prior to (but not yet finalised) or after such finding (and pending the correction of this *Manual*), will be dealt with in accordance with the *Bidvest Group PAIA* manual, which will substitute this *Manual* altogether.
- 3.3 Any reference to days, will be to calendar days and where any number of days is to be calculated from a particular day, such number will be calculated as excluding such particular day and commencing on the next day. If the last day so calculated falls on a day which is not a business day, the last day will be deemed to be the next succeeding day which is a business day.

4. OVERVIEW OF COMPANY PROFILE AND STRUCTURE

- 4.1 The *Company* is a business unit within a subsidiary in the Services division of the *Bidvest Group* i.e. a division within Bidvest Services (Pty) Ltd. The *Bidvest Group* is a public company listed on the Johannesburg Stock Exchange. The information concerning its subsidiaries and associates are updated annually on 30 June to reflect changes. Details regarding the aforesaid can be obtained from the following website: <http://www.bidvest.co.za>.
- 4.2 The *Company* provides hygiene rental equipment, office consumables, deep cleaning and pest control services across all industries. It performs its day-to-day business activities and operations nationally via its respective regional offices and branches. The scope of this *Manual* excludes any regions or branches located outside of RSA.

5. COMPANY CONTACT DETAILS (section 51(1) of PAIA)

- 5.1 The *Company*:

National Head Office	
Head of the <i>Company</i>	Incumbent Chief Executive Officer: Wayne Pollak
Physical address:	110 Loper Avenue, Aeroport, Spartan Extension 2, Kempton Park, 1619
Postal address:	P.O. Box 487, Isando, 1600
Telephone number (landline):	(011) 923-9490
Fax number:	(011) 923-9520
Electronic mail:	info@steiner.co.za
Internet address (website):	www.steiner.co.za

- 5.2 The *Information Officer*:

- 5.2.1 The *Information Officer* of a private body is the head of that private body (sections 1 and 51 of PAIA and sections 55 and 56 of POPIA) i.e. the chief executive officer, or equivalent officer, or any person duly authorised by said officer. The chief executive officer of the *Company* has

resolved to appoint a member of the *Company Personnel* as *Information Officer*. Any requests for access must be addressed to the *Information Officer* as follows:

Information Officer	
Name:	Designated: Trudi Maré
Physical address:	110 Loper Avenue, Aeroport, Spartan Extension 2, Kempton Park, 1619
Postal address:	P.O. Box 487, Isando, 1600
Telephone number (landline):	(011) 923-9490 / 0860 10 11 80
Electronic mail:	legal@steiner.co.za
Internet address (website):	www.steiner.co.za

5.2.2 Other *Personnel* of the *Company* may in accordance with section 56 of *POPIA* (read with section 17 of *PAIA*), be designated as deputy *Information Officers* to perform, or to assist the *Information Officer* with the performance of, the duties and responsibilities herein.

6. **INFORMATION REGULATOR** (section 10(1) read with section 51(1)(b)(i) and 83(1) of *PAIA*)

6.1 The general guide to *PAIA*, updated to comply with *POPIA*, is available in each of the official languages and in braille. The aim of the guide is to facilitate ease of use of *PAIA* and *POPIA* for a *Requester* including:

- 6.1.1 the objects of *PAIA* and *POPIA*;
- 6.1.2 the manner and form requesting access to a *Record*;
- 6.1.3 the assistance available from an *Information Officer* or *Information Regulator* in terms of *PAIA* and *POPIA*;
- 6.1.4 all remedies in law available regarding a private or public body's act or failure to act in respect of a right or duty conferred or imposed by *PAIA* and *POPIA*, including the manner of lodging a complaint to the *Information Regulator* or instituting legal proceedings in a court of competent jurisdiction.

6.2 The guide is available from the *Information Regulator*:

Information Regulator	
Physical address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Electronic mail (complaints):	complaints.IR@justice.gov.za
Electronic mail (general):	infoereg@justice.gov.za
Internet address (website):	www.justice.gov.za/infoereg

6.3 In addition, a copy of the guide will be available in English, Afrikaans, isiZulu and SeSotho:

- 6.3.1 for inspection, free of charge, at the *Company* principal place of business located at 110 Loper Avenue, Aeroport, Spartan Extension 2, Kempton Park, 1619 between 08:00 to 16:30, Monday to Friday (excluding public holidays);
- 6.3.2 in hard copy format, subject to payment of a *Fee*, at the *Company* principal place of business referred to above as well as any of its branches within *RSA*, between 08:00 to 16:30, Monday to Friday (excluding public holidays). Should a request for access in hard copy format be made, the *Requester* must complete Form 2 (Annexure "F"). A request for access must be made in accordance with the procedure stipulated in paragraph 9 of this *Manual*.

7. **AVAILABILITY OF RECORDS** (sections 51 and 52 of *PAIA*)

Records available for access, will be updated as and when required.

7.1 **Voluntary disclosure of or *Records* automatically available (section 52 of *PAIA*)**

7.1.1 Information regarding the *Bidvest Group*, its divisions and subsidiaries as well as annual financial statements may be accessed via: <https://www.bidvest.co.za> or obtained from a

specific statutory body or authority e.g. Companies and Intellectual Property Commission, in accordance with such body or authority's procedures and requirements.

7.1.2 The *Records* of the *Company* that are voluntary disclosed and automatically available are cited in Annexure "B" hereto.

7.1.3 The *Records* referred to in clause 7.1.2 above is available:

- (a) for downloading, free of charge, on the *Company* website: <http://www.steiner.co.za>;
- (b) for inspection, free of charge, at the *Company* principal place of business located at 110 Loper Avenue, Aeroport, Spartan Extension 2, Kempton Park, 1619 between 08:00 to 16:30, Monday to Friday (excluding public holidays);
- (c) in hard copy format, subject to payment of a *Fee*, at the *Company* principal place of business referred to above as well as any of its branches within *RSA*, between 08:00 to 16:30, Monday to Friday (excluding public holidays). Should a request for access in hard copy format be made, the *Requester* must complete Form 2 (Annexure "F"). A request for access must be made in accordance with the procedure stipulated in paragraph 9 of this *Manual*.

7.2 **Records held in accordance with other legislation (section 51(1)(b)(iii) of PAIA)**

7.2.1 Where applicable to the business conducted by the *Company*, it retains *Records* which are required in terms of legislation other than PAIA. *Records* of the *Company* held in accordance with or that involves other legislation (i.e. other than PAIA or POPIA), are cited in Annexure "C" hereto. The cited legislation is not an exhaustive list and will be amended should the *Company* be made aware or become aware of any other legislation (existing or newly promulgated) applicable to its business activities.

7.2.2 Access to such *Records* is dealt with in accordance with the provisions of the cited legislation. The legislation must be consulted to establish whether the *Requester* has a right of access to a *Record* other than in terms of the procedure set out in PAIA.

7.2.3 If the *Requester* believes that a right of access to a *Record* exists in terms of legislation other than that cited, the *Requester* need to bring such legislative right to the attention of the *Information Officer*.

7.3 **Records available only on request to access (section 51(1)(b)(iv) read with sections 53 to 61 of PAIA)**

7.3.1 Any request for access to a *Record* regarding the *Bidvest Group*, its divisions, subsidiaries and annual financial statements may be accessed via: <https://www.bidvest.co.za>. The manual to request access from the *Bidvest Group* is available on aforesaid website. Statutory information such as incorporation documents, memorandum of incorporation concerning Bidvest Services (Pty) Ltd may be obtained from the *Bidvest Group*.

7.3.2 A *Record*, including a description of the subject on which the *Company* holds a *Record* and the categories of *Record* held on each subject, available only on request to access are cited in Annexure "D" hereto.

7.3.3 *POPIA* specific:

- (a) A *Data Subject* may in accordance with section 5(b) of *POPIA* request the *Company* as *Responsible Party*:
 - (i) to confirm, free of charge, all the *Personal Information* it holds about the *Data Subject*;
 - (ii) for access to such information, including information about the identity of third parties who have or have had access to such information;

- (b) A *Data Subject* may at any time:
 - (i) object in accordance with section 11(3) of *POPIA* to the *Processing of Personal Information* by the *Company*, on reasonable grounds relating to his/her particular situation, unless *Data Privacy and Security Laws* or other legislation requires such *Processing*. An objection must be made on Form 1 (Annexure “H”);
 - (ii) request in accordance with section 24(1) of *POPIA* the *Company* to:
 - (aa) correct or delete its *Personal Information* in the *Company’s* possession or under the *Company’s* control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
 - (bb) destroy or delete a *Record of Personal Information* about the *Data Subject* that the *Company* is no longer authorised to retain, and a request must be made on Form 2 (Annexure “I”)

7.3.4 Should a request for access be made (including clause 7.3.3(a)), the *Requester* must complete Form 2 (Annexure “F”). A request for access must be made in accordance with the procedure stipulated in paragraph 9 of this *Manual*. The *Requester* will be notified of the outcome in accordance with Form 3 (Annexure “G”).

8. PROCESSING IN TERMS OF *POPIA*

Purpose

8.1 *POPIA* regulates and controls the *Processing of Personal Information* relating to identifiable, living, natural persons and juristic persons. A *Responsible Party*, such as the *Company*, has a legal duty to process a *Data Subject’s Personal Information* in a lawful, legitimate and responsible manner and in accordance with the provisions herein as well as in the *8 Processing Conditions* and relevant *Data Privacy and Security Laws*.

Data Subjects

8.2 The *Company* holds *Records* and *Personal Information* relating to broad categories of *Data Subjects*, which list is cited in (but not limited to) Annexure “E”.

Purpose of Processing

8.3 The *Company Processes Personal Information* which concerns *Data Subjects* for the purpose as disclosed upon collection or in order for the *Company* to perform the following (without detracting from the generality hereof):

- 8.3.1 to pursue business objectives and strategies including historical record keeping and carrying out market research and business and statistical analysis;
- 8.3.2 to comply with any statutory and lawful obligations, including without detracting from the generality thereof, compliance with tax legislation;
- 8.3.3 to obtain the information and monitor, maintain, manage and carry out actions for the conclusion and performance of a contract as between the *Company* and *Data Subject* or operating and managing the account of a *Data Subject*;
- 8.3.3 to pursue the *Data Subject’s* and/or the *Company’s* legitimate interests, or that of a third party to whom the *Personal Information* is supplied and to put in place protective mechanisms to protect the *Data Subject’s* and/or the *Company’s* legitimate interests including the performance of risk assessments and risk profiles where applicable and necessary;
- 8.3.4 to make or assist in making a credit decision concerning a *Data Subject* by obtaining or providing *Personal Information* from or to a credit bureau or credit association or third party reference provided by the *Data Subject*, information about certain *Data Subject’s* credit record, including information about any judgement or default history;

- 8.3.5 for the purposes of making contact with the *Data Subject* and attending to the *Data Subject's* enquiries, requests and complaints (unless indicated by the *Data Subject* otherwise) or verifying or updating *Data Subject* information;
- 8.3.6 for the purpose of providing the *Data Subject* from time to time with information pertaining to the *Company*, its *Personnel*, goods and/or services and other ad hoc business related information such as marketing information;
- 8.3.7 for the purposes of providing, maintaining, and improving the *Company's* goods and/or services, and to monitor and analyse various usage and activity trends pertaining thereto;
- 8.3.8 for the purposes of performing internal operations, including relating to any prospective, existing and former employment relationship such as management of *Personnel*, *Personnel* benefits, employee wellness programmes, the performance of all required human resources and industrial relations functions including verification of job applicants' information during recruitment, general administration, call centre and customer care lines, attending to all financial matters including budgeting, planning, invoicing, facilitating and making payments, recovery of debt, sending invoices, and generally providing commercial support, where needed, requested or required, and monitor and secure property and persons to its business premises;
- 8.3.9 for the purpose of preventing criminal activities including fraud and abuse of the *Company's* processes, systems, procedures and operations, including conducting internal and external investigations and disciplinary enquiries;
- 8.3.10 any third party that provides the *Company* with goods and/or services including any third party that the *Company* uses to collect payments and recover debts or to provide a service on its behalf;
- 8.3.11 any other reasonably required purpose relating to the *Company's* business activities or that of the division or the *Bidvest Group*.

Recipients of *Personal Information*

- 8.4 Recipients identified by the *Company* to whom it may disclose a *Data Subject's Personal Information* to in relation to clause 8.3, includes but is not limited to:
 - 8.4.1 *Personnel*, temporary employees, learnerships, internships or job applicants;
 - 8.4.2 entities within the *Bidvest Group*;
 - 8.4.3 financial institutions (e.g. bank) from whom payments are received or to whom payment is to be made or other payment systems;
 - 8.4.4 third parties to whom payments are made on behalf of any *Personnel*;
 - 8.4.5 third parties collecting payments/debts on behalf of the *Company*;
 - 8.4.6 third parties providing goods and/or services to or on behalf of the *Company* such as vendors, suppliers and service providers including but not limited to, advertisers, medical service providers, insurance companies, pensions and provident funds, wellness or health providers, credit bureaus or other association for the industry in which the *Company* operates;
 - 8.4.6 representatives or agents including attorneys or auditors
 - 8.4.7 government or regulatory authorities, statutory oversight bodies, judicial commissions of enquiry and enforcement agencies;
 - 8.4.8 a court, administrative, judicial or arbitration forum, statutory commission or ombudsman;
 - 8.4.9 customers/clients;

- 8.4.10 third parties with whom the *Company* conducts business;
- 8.4.11 anyone making a successful Request for Access in terms of *PAIA* or *POPIA*;
- 8.4.12 other parties as set out above, from time to time, but subject to an agreement which will be concluded between the *Company* and the party to whom the *Company* is disclosing the *Personal Information* to, which contractually obliges the recipient of the personal information to comply with strict confidentiality and data security conditions.
- 8.4.13 in terms of a legal duty or a legal right to do so.

Processing

8.5 Storage, retention and destruction:

- 8.5.1 The *Company* will ensure that a *Data Subject's Personal Information* is securely stored electronically, which for operational reasons, will be accessible to certain categories of authorised *Personnel* within the *Company* or *Bidvest Group* on a need to know and business basis, save that where appropriate, some of the *Data Subject's Personal Information* may be retained in hard copy and stored securely.
- 8.5.2 The *Company* will ensure that it performs regular audits regarding the safety and the security of all *Data Subjects' Personal Information*.
- 8.5.3 Appropriate technical and organisational measures will be taken by the *Company* to ensure the confidentiality, integrity and availability of *Personal Information* and secure against unauthorised or unlawful processing and accidental loss or destruction or damage, alteration or access including secure set-up of hardware and software, firewalls, virus protection software and update protocols as well as transmission control, video monitoring or physical access control.
- 8.5.4 Once the *Data Subject's Personal Information* is no longer required due to the fact that the purpose for which the *Personal Information* was held has come to an end and expired, such *Personal Information* will be safely and securely archived for the required or prescribed periods (e.g. by legislation or industry) or longer should this be legitimately required by the *Company*. The *Company* thereafter will ensure that such *Personal Information* is permanently destroyed.

8.6 Access and cross-border transfer:

- 8.6.1 The *Company* may from time to time have to disclose a *Data Subject's Personal Information* to third parties, including government and regulatory authorities, other divisions or subsidiaries, local or cross-border goods and/or service vendors, but such disclosure will be:
 - (a) subject to an arrangement or agreement which will be concluded as between the *Company* and the party to whom it is disclosing the *Data Subject's Personal Information* to, which obliges the recipient of this *Personal Information* to comply with confidentiality and data security conditions;
 - (b) necessary for the performance of a contractual obligation between the *Company* and the *Data Subject*;
 - (c) necessary for the hosting of certain information technology infrastructure and application are in foreign jurisdictions;
 - (d) necessary if to the benefit of the *Data Subject*, and it is not reasonably practicable to obtain the consent of the *Data Subject*, and if it were, the *Data Subject*, would likely provide such consent.
- 8.6.2 Where *Personal Information* and related data is transferred to a country which is situated outside the borders of the *RSA*, the *Data Subject's Personal Information* will only be transferred to those countries which have similar data privacy and security laws in place or

where the recipient of the *Personal Information* is bound contractually to a no lesser set of obligations than those imposed by *POPIA*.

9. PROCEDURE TO ACCESS A *RECORD* (SECTION 51(1)(e) of *PAIA*)

9.1 The basis underpinning access to a *Record*:

- 9.1.1 all requirements for access in this *Manual*, *PAIA* and/or *POPIA* or any requirements stipulated by the *Information Regulator* or a court of competent jurisdiction, must be met prior to a request being processed or access being granted;
- 9.1.2 a *Requester* will only be entitled to access a *Record* where the *Requester* has satisfied the *Information Officer* that the *Record* is required to exercise or protect a right;
- 9.1.3 the successful completion and submission of a form requesting access does not automatically allow the *Requester* access to the requested *Record*. Access may be subject to third party involvement in terms of *PAIA* and/or *POPIA*, granted in part only or refused, or be subject to a decision from the *Information Regulator* or an order from a court of competent jurisdiction;
- 9.1.4 if it is reasonably suspected that the *Requester* has obtained access to a *Record* through the submission of materially false or misleading information, legal proceedings may be instituted against such a *Requester*;
- 9.1.5 all notification or communication will occur or be confirmed in written format.

9.2 Access request procedure:

Completion of prescribed form (section 53 of *PAIA*)

- 9.2.1 Any request to access must comply with the formalities as prescribed by *PAIA* and be submitted with the *Information Officer* on the prescribed form, i.e. Form 2, attached hereto as Annexure "F", or for download from the *Information Regulator's* webpage. A *Requester* must complete the form in compliance with the provisions herein. The *Company* will not be held responsible for delays due to non-compliance with *PAIA* formalities or a form not completed as required herein.
- 9.2.2 Instructions regarding the completion of the form:
 - (a) it must be completed in full i.e. all questions must be answered or indicated as "not applicable" if it does not apply, or "nil" if nothing to declare or disclose;
 - (b) it must be completed in type or print in BLOCK LETTERS;
 - (c) in the event of insufficient space, additional information may be provided on a separate folio (to be attached to the form) and each answer on such folio must reflect the applicable title of the question responding to;
 - (d) it must be completed in the English language.
- 9.2.3 Instructions regarding the content to be included by the *Requester* in the form:
 - (a) full particulars of the *Requester* must be provided including contact details such as and if available, fax number or postal address in the *RSA*, supported by:
 - (i) a certified copy of a *Personal Requester's* identity document or other legal form of identity (e.g. driver's licence) must be attached to the form to authenticate identity; or
 - (ii) in the event of a *Third Party Requester*, the person must attach the following to the form:
 - (aa) a certified copy of the identity document or other legal form of identity (e.g. driver's licence) of the person on whose behalf the request is lodged;
 - (bb) proof of the capacity in which the *Third Party Requester* is acting;

- (cc) a certified copy of the identity document or other legal form of identity (e.g. driver's licence) of the third party;
- (b) sufficient information must be provided in order to enable the identification of the *Record* requested;
- (d) the right which the *Requester* seeks to exercise or protect must be clearly identified and why the information is required as it relates to the exercise or protection of the referred to right;
- (e) the manner and/or form of access required must be indicated. If, in addition to a written reply, the *Requester* wishes to be informed of the decision in respect of the request in any other manner, he/she must clearly indicate such request.

9.2.4 The only exemption to the *Requester* complying with the procedures herein and thus completing and submitting the prescribed form is in instances of the *Requester* not capable of completing it due to illiteracy, disability or a language barrier. In aforementioned instance, the request for access may be made orally to the *Information Officer*. The *Information Officer* will complete the form on behalf of the *Requester* and provide a copy thereof (free of charge) to the *Requester*.

Evaluation and Notification

9.3 Notification period:

9.3.1 The *Information Officer* will upon receipt of a request, consult with all relevant *Personnel* in the *Company* involved or associated with the *Record*.

9.3.2 A decision on the request will be made and the *Requester* notified thereof within 30 days of receipt of the request (section 56 of *PAIA*).

9.3.3 The following circumstances may affect the 30-day period (section 57 of *PAIA*):

- (a) the form is not fully compliant with the provisions herein. The period will only commence upon full compliance;
- (b) a request for urgent processing on the part of the *Requester* (i.e. in less than 30 days). The request must be substantiated with good reason, to the satisfaction of the *Information Officer*; or
- (c) the *Information Officer* may, with the *Requester's* permission or in his/her sole discretion, extend the period once for a further period of not more than 30 days, in event of:
 - (i) the request is for a large volume of *Records* or it requires a search through a large volume of *Records*;
 - (ii) if the back-up of the *Records* or the storage and/or collection thereof are off-site and not kept at the offices of the *Company* or in the same town/city as the *Company's* main office; and/or
 - (iii) consultation with third parties (internal or external to the *Company*) is necessary or desirable and such consultation will not be reasonably completed within the 30-day period or if the *Record* to which access is requested contains information about a third party (see clause 9.4).

9.3.4 As soon as possible, but within 30 days of receipt of the request and in event of:

- (a) the form not being compliant (as per clause 9.3.3(a)), the *Information Officer* will notify the *Requester* accordingly, for the request to be re-submitted;
- (b) the refusal of a request for urgent processing (as per clause 9.3.3(b)), the *Information Officer* will notify the *Requester* accordingly, for the request to be dealt with in accordance with the procedure herein; or
- (c) an extension (as per clause 9.3.3(c)), the *Information Officer* will notify the *Requester* in writing of the period of extension and the reasons for the extension (including the provisions of *PAIA* relied on).

9.3.5 The notification referred to in clause 9.3.4, will in addition inform the *Requester* of:

- (a) the entitlement to lodge a complaint with the *Information Regulator* or an application with a court against the *Information Officer's* decision; and
- (b) the procedure (e.g. time period) for lodging the complaint or application,

with the status quo remaining (i.e. as per clause 9.3.4) pending the outcome of the complaint or court application.

9.4 Evaluation in event of third party involvement or third party information being part of the *Record* (sections 63 to 65, 69 and Chapter 5 of *PAIA*):

9.4.1 Should upon evaluation of the request, the *Information Officer* conclude that the *Record* contains third party information or requires third party involvement, the *Information Officer* will attempt to contact the third party within 21 days of receipt of the request.

9.4.2 Any notification to the third party will be in accordance with any prescribed form and will:

- (a) inform the third party of the request for access received and the name of the *Requester*;
- (b) describe the content of the *Record* and that the *Record* may be one contemplated in the following sections of *PAIA* inclusive of the reasons why:
 - (i) section 63(1) i.e. mandatory protection of the privacy of the third party who is a natural person;
 - (ii) section 64(1) i.e. mandatory protection of the third party's commercial information;
 - (iii) section 65 i.e. mandatory protection of confidential information of the third party;
 - (iv) section 69(1) i.e. mandatory protection of third party research information;
- (c) afford the third party 21 days from date of notification to:
 - (i) submit representations for refusal of the request; or
 - (ii) grant consent for access to the *Record*.

9.4.3 Should the third-party timeously furnish reasons for the support or denial of access, the *Information Officer* will consider these reasons in determining whether access should be granted, or not.

9.5 Notification of the outcome:

9.5.1 The *Information Officer* will notify the *Requester* as well as any third party involved (see clause 9.4 above) of the:

- (a) outcome; and
- (b) the reasons and the provisions of *PAIA* relied upon to justify the decision.

in accordance with Form 3 (Annexure "G").

9.5.2 In the absence of any notification:

- (a) within the 30-day period (section 58 of *PAIA*); or
- (b) in accordance with the modified period as per clause 9.3.4; or
- (c) in accordance with a period stipulated in a decision or the *Information Regulator* or an order from the court (as per clause 9.3.5),

the request may be deemed as being refused, with the provisions of clauses 9.9 and 9.11 below to apply.

Outcome

9.6 *Records not found or non-existent (section 55 of PAIA):*

9.6.1 If a *Record* requested cannot be found, or does not exist, the *Information Officer* shall notify the *Requester* accordingly by means of an affidavit or affirmation, indicating all steps taken to find the *Record*, and in accordance with Form 3 (Annexure "G").

9.6.2 Should the *Record* subsequently be found, the process herein will be followed accordingly, with the *Requester* being granted access (or part) thereto or being refused access.

9.7 Request for access is successful (section 50 read with 56(2) of PAIA):

9.7.1 Access will at all times be afforded to a *Record* in event of it:

- (a) being in accordance with third party consent thereto, where the *Record* or information concerned the specific third party;
- (b) is publicly available;
- (c) given to the *Company* by the individual to whom it relates and the individual was informed by or on behalf of the *Company*, before it is given, that the information belongs to a class of information that would or might be made available to the public;
- (d) about an individual who is or was part of the *Personnel* of the *Company* and that relates to the position or functions of the individual, including, but not limited to:
 - (i) the fact that the individual is or was part of the *Personnel* of the *Company*;
 - (ii) the title, work address, work phone number and other similar particulars of the individual;
 - (iii) the classification, salary scale or remuneration and responsibilities of the position held or services performed by the individual;
 - (iv) the name of the individual on a document prepared by the individual in the course of employment;
 - (v) revealing evidence of a substantial contravention of, or failure to comply with, the law; or imminent and serious public safety or environmental risk; and
 - (vi) being in the public interest.

9.7.2 The *Information Officer* will notify the *Requester* accordingly within the required time frame (see clause 9.3 and 9.5.1 above) inclusive of:

- (a) anticipated date or time frame of access. Access to a *Record* involving third party information will only be afforded to the *Requester* 30 days after notification to the third party, unless the third party consented to the access;
- (b) the manner or form of access. If reasonably possible, access will be provided in the manner or form indicated by the *Requester* alternatively the form or manner reasonably determined by the *Information Officer*;
- (c) the *Fee* payable prior to access being afforded;
- (d) the *Requester's* right to approach the *Information Regulator* or court in the event of dissatisfaction (as per clause 9.7.3).

9.7.3 A complaint may be lodged with the *Information Regulator* or an application may be brought to a court:

- (a) by the *Requester*, against:
 - (i) the *Fee* payable; and/or
 - (ii) the procedure (e.g. time period) for lodging the complaint or application;
- (b) by a third party notified (see clauses 9.3 read with 9.5.1), within 30 days of being notified that access is being granted, against:
 - (i) the decision of the *Company*; and
 - (ii) the procedure (e.g. time period) for lodging the complaint or application,

The status quo remains (i.e. access not afforded) pending the outcome of the complaint or application.

9.8 Request for access is partly successful (section 59 of *PAIA*):

9.8.1 If a request for access concerns a *Record* containing information which may or must be refused in terms hereof or any provision of Chapter 4 of *PAIA*, every part of the *Record* to which access may be granted and that can reasonably be severed from any part that is refused, will be disclosed, with any part of the record which may or must be refused, being omitted (see section 52(4) of *PAIA*).

9.8.2 The *Information Officer* will notify the *Requester* accordingly as provided for in clause 9.5.1:

- (a) with the provisions of clauses 9.7.2 and 9.7.3 applying in respect of that part of the *Record* to which access is afforded; and
- (b) with the provisions of clauses 9.9 and 9.11 applying in respect of that part of the *Record* to which access is refused.

9.9 Request for access is refused (section 56(3) of *PAIA*):

9.9.1 Access to a requested *Record* may legitimately be refused if it falls within a certain category cited in sections 62 to 69, Chapter 4 of *PAIA* including:

- (a) protecting the privacy or *Personal Information* that the *Information Officer* holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure, unless consented thereto by the third person or the information is already publicly available;
- (b) protecting commercial information that is held about a third party or the *Company* or a particular company or entity in the *Bidvest Group*. Commercial information will include trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organization or the third party if disclosed and the disclosure of the *Record* would result in a breach of a duty of confidence owed by the *Company* to a third party in terms of an agreement or could put the *Company* or third party at a disadvantage in contractual or other negotiations or prejudice a third party, the *Company* or a particular company or entity in the *Bidvest Group* in commercial competition;
- (c) if disclosure of the *Record* would endanger the life or physical safety of an individual;
- (d) if disclosure of the *Record* would prejudice or impair the security, safety or protection of property (including a building, structure or system) or means of transport;
- (e) if disclosure of the *Record* would prejudice or impair methods, systems, plans or procedure for the protection of the safety of the public or the security of property (including a building, structure or system);
- (f) the *Record* is privileged from production in legal proceedings (i.e. is required after commencement of proceedings and for purpose of the proceedings, whilst the court process already provides for access), unless the legal privilege is waived or access granted by the court;
- (g) the *Record* is a computer programme (owned by the *Company* and which are protected by copyright or intellectual property);
- (h) the *Record* contains information about research being carried out or about to be carried out on behalf of a third party or the *Company*;
- (i) the request is clearly frivolous or vexatious or involves an unreasonable diversion of resources.

9.9.2 The *Information Officer* will notify the *Requester* accordingly as provided for in clause 9.5.1 inclusive of the *Requester's* right to approach the *Information Regulator* or court in the event of dissatisfaction against:

- (a) the refusal; and/or

(b) the procedure (e.g. time period) for lodging the complaint or application,

The status quo will remain (i.e. access not afforded) pending the outcome of any complaint or application.

Fees (section 54 of PAIA)

9.10 Prior to processing of a request or access being afforded, the *Requester* may be required to settle the required *Fee*, as described under Annexure “J”, depending on the type of information requested.

9.10.1 A *Personal Requester* is exempted from payment of the request *Fee* (if any).

9.10.2 The *Company* will provide a *Requester* with a written estimate of the payable amount before providing the service. In event of a request for access being successful, the *Requester* may be required to settle a deposit as part of the access *Fee*.

(a) A deposit will be required depending on certain factors such as the preparation of the *Record* and/or the volume and/or format of the information requested. Request for a deposit is in the sole discretion of the *Company*.

(b) If access is subsequently only partly granted or refused, thereby affecting the access *Fee*, the deposit or a part thereof will be repaid to the *Requester*.

9.10.3 Payment details can be obtained from the *Information Officer* and payment may be made via a direct deposit or electronic funds transfer (no credit card or cash payments are accepted). Proof of payment must be submitted with the *Information Officer* prior to the processing of the request or access being afforded. Where a decision to grant a request for access has been taken, the *Record* will not be disclosed until the necessary *Fees* have been paid in full.

9.10.4 Any *Fee* (or part thereof) will not be payable upon the successful lodging of a complaint with the *Information Regulator* or application to a court by a *Requester* against the payment thereof.

Recourse

9.11 Procedure in event of dissatisfaction:

9.11.1 Internal process:

(a) The *Company* does not have internal appeal procedures. As such, the decision made by the *Information Officer* is final, and a *Requester* or third party will have to exercise any external remedies at his/her disposal in the event of any dissatisfaction.

9.11.2 External process:

(a) In accordance with sections 56(3) (c) and 78 of *PAIA*, a *Requester* or third party dissatisfied with any decision may lodge a complaint with the *Information Regulator* or apply to a court within 180 days of notification of a decision, for appropriate relief.

10. GENERAL

10.1 The contents of this *Manual* are updated on a regular basis (as per section 51(2) of *PAIA*) and may therefore change without prior notice.

10.2 The *Company* has no control over the content once printed.

10.3 The *Company* or its *Personnel* is not criminally or civilly liable for anything done in good faith in the exercise or performance or purported exercise or performance of any power or duty in terms of this *Manual* or applicable *Data Privacy and Security Laws* or other legislation.

GLOSSARY

In this *Manual*, unless the context otherwise indicates:

1. “8 *Processing Conditions*” means the eight conditions for lawful *Processing* as contained in *POPIA*:
 - 1.1 accountability: the *Responsible Party* has an obligation to ensure that there is compliance with *POPIA* in respect of the *Processing* of *Personal Information* from the time the purpose for which it is *Processed* and the means of *Processing* are determined, as well as during the *Processing*;
 - 1.2 *Processing* limitation: *Personal Information* must be collected directly from a *Data Subject* to the extent necessary and must only be *Processed* with the consent of the *Data Subject* and must only be used for the purpose for which it was obtained;
 - 1.3 purpose specification: *Personal Information* must only be *Processed* for the specific purpose for which it was obtained and must not be retained for any longer than it is needed to achieve such purpose;
 - 1.4 further *Processing* limitation: further *Processing* of *Personal Information* must be compatible with the initial purpose for which the information was collected;
 - 1.5 information quality: the *Responsible Party* must ensure that *Personal Information* held is accurate and updated regularly and that the integrity of the information is maintained by appropriate security measures;
 - 1.6 openness: there must be transparency between the *Data Subject* and the *Responsible Party*;
 - 1.7 security safeguards: a *Responsible Party* must take reasonable steps to ensure that adequate safeguards are in place to ensure that *Personal Information* is being *Processed* responsibly and is not unlawfully accessed;
 - 1.8 *Data Subject* participation: the *Data Subject* must be made aware that their information is being *Processed* and must have provided their informed consent to such *Processing*;
2. “*Bidvest Group*” means the Bidvest Group Ltd (registration number: 1946/021180/06) inclusive of its subsidiaries and associates;
3. “*Company*” means Bidvest Steiner which is a division within the business entity Bidvest Services (Pty) Ltd t/a (registration number: 2000/011155/07);
4. “*Constitution*” means the Constitution of the Republic of South Africa Act No. 108 of 1996;
4. “*Data Privacy and Security Laws*” means all legislation concerning how *Personal Information* is collected, shared and used as well as the protection thereof from compromise, and includes but is not limited to *PAIA* and *POPIA*;
5. “*Data Subject*” means the person to whom the *Personal Information* relates and may be a natural or juristic person;
6. “*Fees*” means:
 - 6.1 a request fee, if any, that is an initial, non-refundable fee payable on submission of a request (save for a *Personal Requester*) prior to consideration being given thereto; and/or
 - 6.2 an access fee that is the fee payable for the search, preparation, reproduction and/or delivery of a *Record* and may include a deposit payable in terms section 54(2) to (4) of *PAIA*, as a refundable percentage (not exceeding one third) of the total access fee which would be

payable if the request is successful and if aforesaid search and preparation of the *Record* is anticipated to exceed 6 hours,

with the prescribed amounts charged as per regulation (see Annexure “J”);

7. “*Information Officer*” means the person identified in clause 5.2 of the *Manual*, who fulfils the purpose referred to in clauses 2.1 and 2.2 of this *Manual* (read with section 51(1) of *PAIA* and section 55(1) of *POPIA*), encourages and oversees compliance with both *PAIA* and *POPIA* and performs such responsibilities as provided for in relevant *Data Privacy and Security Laws*;
8. “*Information Regulator*” means the Information Regulator established in terms of section 39 of *POPIA*;
9. “*Manual*” means this manual prepared in accordance with and giving effect to *PAIA* and *POPIA*, including all appendixes;
9. “*PAIA*” means the Promotion of Access to Information Act No. 2 of 2000, as amended;
10. “*Personal Information*” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
 - 10.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person (including place of birth);
 - 10.2 information relating to the education or the medical, financial (e.g. bank details, tax number), criminal or employment history of the person;
 - 10.3 any identifying number (e.g. date of birth, identity or passport number of a natural person or the registration number of a juristic person), symbol, address (e.g. e-mail address or physical address), telephone number, location information, online identifier or other particular assigned to the person;
 - 10.4 the biometric information of the person including fingerprints or images by way of closed-circuit television;
 - 10.5 the personal opinions, views or preferences of the person e.g. union membership;
 - 10.6 correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 10.7 the views or opinions of another individual about the person;
 - 10.8 the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person e.g. founding documentation, authorised signatories or ultimate beneficial owner;
11. “*Personal Requester*” means a requester seeking access to a *Record* containing *Personal Information* about the requester self;
12. “*Personnel*” means an official of the *Company* or any person who works for or provides services to or on behalf of the *Company* and who receives or is entitled to receive remuneration or who assist in carrying out or conducting the business of the *Company* and includes directors and permanent, temporary and fixed-term contract employees;
13. “*POPIA*” means the Protection of Personal Information Act 4 of 2013;
14. “*Process*” or “*Processing*” or “*Processed*” means any operation or activity or any set of operations, whether or not by automatic means, concerning *Personal Information*, including:

- 14.1 the collection, receipt, recording, importing, organisation, collation, handling, storage, updating or modification, retrieval, alteration, consultation or use;
 - 14.2 dissemination by means of transmission, distribution or making available in any other form; or
 - 14.3 merging, linking, as well as restriction, degradation, erasure, disposal, deletion or destruction of information;
15. “*Record*” means any recorded information:
- 15.1 regardless of form or medium, automated or non-automated, including any of the following:
 - (a) writing on any material;
 - (b) information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
 - (c) label, marking or other writing that identifies or describes any thing of which it forms part, or to which it is attached by any means;
 - (d) book, map, plan, graph or drawing;
 - (e) photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
 - 15.2 in the possession or under the control of the *Company*;
 - 15.3 whether or not it was created by the *Company*;
 - 15.4 regardless of when it came into existence;
16. “*Responsible Party*” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for *Processing Personal Information* and for purpose of this *Manual* it is the *Company*;
17. “*Requester*” means a *Personal Requester* and/or a *Third Party Requester*;
18. “*RSA*” means the Republic of South Africa.
19. “*Third Party Requester*” means:
- 19.1 any person, natural or juristic, making a request for access;
 - 19.2 a public body requesting a *Record* subject to:
 - (a) it complying with all procedural requirements in the *Manual*;
 - (b) the *Record* being required for the exercise or protection of a right (other than its own);
 - (c) the absence of any grounds for refusal; and
 - (d) it being in the public interest (section 50(2) of *PAIA*); or
 - 19.3 the person requesting access to a *Record* on behalf of another (‘grantor’), with the grantor’s consent (i.e. proof of capacity/authorisation is available), and where access is required for the protection of a legal right of the grantor.

VOLUNTARY DISCLOSURE OF OR RECORDS AUTOMATICALLY AVAILABLE
(section 52 of PAIA)

The *Records* of the *Company* that are voluntary disclosed and automatically available are:

1. Certifications:
 - 1.1 B-BBEE (broad-based black economic empowerment);
 - 1.2 Fedhasa (Federated Hospitality Association of Southern Africa);
 - 1.3 International Standards (ISO) i.e. ISO 9001:2015, ISO14001: 2015 and ISO 45001:2018;
 - 1.4 IWMSA (Institute of Waste Management of Southern Africa);
 - 1.5 NCCA (National Contract Cleaners Association);
 - 1.6 NPMA (National Pest Management Association);
 - 1.7 Safma (South African Facilities Management Association);
 - 1.8 SAPCA (South African Pest Control Association);
2. Marketing and promotional material e.g. information segments;
3. Products, consumables and services details e.g. catalogue;
4. Locality and contact details;
5. Policies applicable to external parties:
 - 5.1 Privacy Policy;
 - 5.2 Legal Statement and Disclaimer (website);
 - 5.3 the *Manual*;
 - 5.4 Terms of Use (website).

LEGISLATION (OTHER)**Applicable to or Records held in accordance with other legislation***(section 51(1)(d) of PAIA)*

Legislation applicable to *Records* of the *Company* or *Records* of the *Company* available in accordance with the following legislation, subsequent amendments thereto as well as any subordinate legislation e.g. regulations, notices or directives:

1. Aliens Control Act No. 96 of 1991
2. Basic Conditions of Employment Act No.75 of 1997
3. Bills of Exchange Act No. 34 of 1964
4. Board Based Black Economic Empowerment Act No. 53 of 2003
5. Companies Act No. 71 of 2008
6. Compensation for Occupational Injuries and diseases Act No. 130 of 1993
7. Competition Act No. 89 of 1998
8. Consumer Protection Act No. 68 of 2008
9. Constitution of the Republic of South Africa No. 108 of 1996
10. Copyright Act No. 98 of 1978
11. Counterfeit Goods Act No. 37 of 1997
12. Currency and Exchanges Act No. 9 of 1933
13. Customs and Excise Act No. 91 of 1964
14. Customs Duty Act No. 30 of 2014
15. Debt Collectors Act No. 114 of 1998
16. Designs Act No. 195 of 1993
17. Domicile Act No. 3 of 1992
18. Electronic Communications Act No. 36 of 2005
19. Electronic Communication and Transactions Act No. 25 of 2002
20. Employment Equity Act No. 55 of 1998
21. Fertilizers, Farm Feeds, Seeds and Remedies Act No. 36 of 1947
22. Financial Intelligence Centre Act No. 38 of 2001
23. Identification Act No. 68 of 1997
24. Income Tax Act No. 58 of 1962
25. Insolvency Act No. 24 of 1936
26. King IV Code on Corporate Governance, 2017
27. Labour Relations Act No. 66 of 1995

28. Merchandise Marks Act No. 17 of 1941
29. National Credit Act No. 34 of 2005
30. National Payment System Act No. 78 of 1998
31. National Regulator for Compulsory Specifications Act No. 5 of 2008
32. National Environmental Management Act No. 107 of 1998
33. National Environmental Management: Waste Act No. 59 of 2008
34. Occupational Health and Safety Act No 85 of 1993
35. Patents Act No. 57 of 1978
36. Pension Funds Act No. 24 of 1956
37. Prescription Act No. 68 of 1969
38. Prevention of Organized Crime Act No. 121 of 1998
39. Prevention and Combating of Corrupt Activities Act No.12 of 2004
40. Promotion of Access to Information Act No. 2 of 2000
41. Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2000
42. Protected Disclosures Act No. 26 of 2000
43. Protection of Personal Information Act No.4 of 2013
44. Regulation of Interception of Communications and Provision of Communication-related Information Act No. 70 of 2002
45. Skills Development Levies Act No. 9 of 1999
46. Skills Development Act No. 97 of 1998
47. South African Revenue Services Act No. 34 of 1997
48. Standards Act No. 8 of 2008
49. Tax Administration Act No. 28 of 2011
50. Tax on Retirement Funds Act No. 38 of 1996
51. Trademarks Act No. 194 of 1993
52. Unemployment Insurance Contributions Act No. 4 of 2002
53. Unemployment Insurance Act No. 63 of 2001
54. Value Added Tax Act No. 89 of 1991
55. such other legislation as may from time to time be applicable.

RECORDS HELD BY THE COMPANY AND AVAILABLE ONLY ON REQUEST TO ACCESS*(section 51(1)(e) of Promotion of Access to Information Act No. 2 of 2000)*

(Description of the subject on which the *Company* holds *Records* and the categories of *Records* held on each subject)

1. Financial:
 - 1.1 Financial statements and reports, accounting records and supporting documentation;
 - 1.2 Internal and external audit reports and management reports;
 - 1.3 Banking details, accounts and bank statements and records;
 - 1.4 Administrative records;
 - 1.5 Tax records and returns;
 - 1.6 Customs and excise records;
 - 1.7 Value added tax records;
 - 1.8 Assets registers;
 - 1.9 Debtors and creditors records including invoices;
 - 1.10 General ledgers and reconciliation;
 - 1.12 Risk management framework;
 - 1.13 Pricing formulae concerning goods and/or services;
 - 1.14 Policies and procedures regarding financial aspects and processes;

2. Legal:
 - 2.1 Documentation pertaining to litigation;
 - 2.2 General agreements or contracts and related documentation (including agreement, contracts or credit applications concluded with clients, vendors, suppliers, service providers and other third parties and policies or procedures or codes of conduct issued by the aforesaid);
 - 2.3 Lease agreements (immovable property);
 - 2.4 Merger and acquisition contracts and documentation;
 - 2.4 Licenses, permits and authorizations and consents;

3. Insurance:
 - 3.1 Claims records;
 - 3.2 Details of insurance policies, risk assessments, coverage, limits and insurers;

4. *Personnel*:
 - 4.1 Records specific to personnel, whether provided by the individual itself, a third party (e.g. sick leave or medical certificates) or internal to the *Company* including but not limited to:
 - (a) letter of appointment or employment contracts and agreements including confidentiality agreement and restraint of trade agreements;
 - (b) South African Revenue Service submissions in respect of employees or tax returns of personnel including IRP5, pay-as-you-earn, unemployment insurance fund, workman's compensation fund and skills development levies records;
 - (c) remuneration and benefits records;
 - (d) industrial relations records including disciplinary and other performance records as well as industrial action records;
 - (e) training manual and records and study assistance records (including SETA records);
 - (f) personal details of personnel including copies of identity document or passport, employment history and references, banking and financial details, as well as contact details (e.g. physical address);
 - (g) general communication and correspondence concerning personnel;
 - (h) incident records in respect of occupational health and safety;
 - 4.2 records from third parties concerning *Personnel* including:
 - (a) collective and other organised labour agreements;

- (b) membership subscriptions;
 - (c) commission for conciliation, mediation and arbitration (CCMA) records or outcomes;
 - (d) medical aid records;
 - (e) details of payment to third parties i.e. deductions from remuneration;
 - (f) pension/provident fund records;
- 4.3 records and registers concerning *Company* employment conditions, policies and procedures and plans (e.g. employment equity plans) as well as forms e.g. leave application, attendance records/registers;
5. Procurement, Sales and Marketing:
- 5.1 Vendor/supplier/service provider transaction records and supporting information, records provided by the vendor/supplier/service provider or by third parties about the vendor/supplier/service provider, for example pricing, purchasing records and invoices;
 - 5.2 Potential and actual customer transaction records and supporting information, records provided by the customer or by a third party about the customer, for example vendor or credit application forms (which includes business and directors information), sales records, pricing, payment performance records and contact details;
 - 5.3 Marketing and advertising records including digital information;
 - 5.4 Product records including quality testing procedures and records and warehousing and transportation records;
 - 5.5 Policies, procedures, plans and strategies regarding procurement, sales and marketing;
6. Systems and Information Technology:
- 6.1 Commercial and personal data including browsing habits and clicks patterns on *Company* website;
 - 6.2 Information security measures as well as information technology systems, capabilities and available solutions, support and products (software and hardware);
 - 6.3 Disaster recovery plan and procedure;
 - 6.4 Asset register (hardware);
 - 6.5 Policies and procedures including information security, usage and access;
 - 6.6 User manuals and documentation;
 - 6.7 Software and licensing documentation;
 - 6.8 Audit reports;
7. Operations:
- 7.1 Environment, Health and Safety information and records;
 - 7.2 Delivery, service and installation records;
 - 7.3 Risk management framework;
 - 7.4 Audit reports;
 - 7.5 Sustainable development and corporate social responsibility including enterprise/supplier development;
8. Commercial (copies of prior and existing corporate structures):
- 8.1 Memorandum of incorporation and share certificates;
 - 8.2 Minutes of meetings including meetings of members of the board;
 - 8.3 *Personal Information* of board members;
 - 8.4 Registers e.g. conflict of interest;
 - 8.5 Resolutions;
 - 8.6 Restructuring/re-organisation records;
9. General:
- 9.1 Correspondence (internal and external)

RECORDS AND PERSONAL INFORMATION OF DATA SUBJECTS

The *Company* holds *Records* and *Personal Information* relating to broad categories of *Data Subjects*, including:

1. Customers (juristic persons):

Names of contact persons; name of legal entity; physical and postal address and contact details; financial information (including credit reports); registration number; founding documents (if applicable); tax related information; authorised signatories; identity/passport documentation; confidential and general correspondence

2. Customers (natural persons):

Names; contact details including physical addresses and electronic mail address; financial information (e.g. credit card detail); confidential and general correspondence

3. Third party vendors including contractors, suppliers or service providers:

Names of contact persons; name of legal entity; physical and postal address and contact details; financial information (including banking information); registration number; founding documents (if applicable); tax related information; authorised signatories; certification (e.g. B-BBEE certificate); confidential and general correspondence

4. Intermediaries including advisors, financial institutions, insurers or agents and other business partners, whether acting on behalf of the *Company* or not, or providing services, goods and other benefits to the *Company* such as pension and provident funds, payment system or services:

Names of contact persons; name of legal entity; physical and postal address and contact details; financial information (including banking information); registration number; founding documents (if applicable); tax related information; authorised signatories, confidential documentation/ correspondence and general correspondence

5. *Personnel* (former and current), job applicants, learnership candidates, bursary applicants, interns, agents or representatives and/or family members of the aforesaid:

Gender; pregnancy status; marital status; race, age, language, education information; financial information; employment history; identity/passport documentation; next of kin; children's name, gender, age, school, grades; physical and postal address; contact details (including electronic mail address and phone number); opinions, criminal behaviour and/or criminal records; trade union membership; external commercial interests/obligations; medical information and health records; images; demographics; biometrics

6. Website/Application end-users:

Names, electronic identification data: IP address; log-in data, cookies, electronic localization data; cell phone details, GPS data, social media

7. Regulators, authorities and public or government bodies who the *Company* engages with in order to discharge legal and public duty obligations, including the South African Revenue Service and the Department of Employment and Labour:

Names of contact persons; physical and postal address and other contact details

8. Occasional third parties such as: (a) users of the *Company's* website, social media portals or platforms, whether in order to enquire more about the *Company* or to do business with the *Company*, be it providing or selling to the *Company* or receiving or acquiring goods and/or services; (b) persons who interact with the *Company* physically or enter sites, offices, parking areas and all facilities of the

Company or interact via websites, electronic mail or correspondence; (c) third parties to whom payments are made on behalf of *Personnel*:

Names of contact persons; physical and postal address and other contact details

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests 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 <i>(when made on behalf of another person)</i>									
Postal Address									
Street Address									
E-mail Address									
Contact Numbers	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; padding: 2px;">Tel. (B):</td> <td style="width: 40%; padding: 2px;"> </td> <td style="width: 20%; padding: 2px;">Facsimile:</td> <td style="width: 20%; padding: 2px;"> </td> </tr> <tr> <td style="padding: 2px;">Cellular:</td> <td colspan="3" style="padding: 2px;"> </td> </tr> </table>	Tel. (B):		Facsimile:		Cellular:			
Tel. (B):		Facsimile:							
Cellular:									
Full names of person on whose behalf request is made <i>(if applicable)</i> :									
Identity Number									
Postal Address									

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>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.)</i>			
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:	

FEEES	
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 <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

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

Signature of Information Officer

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
 [Regulation 8]

Note:

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

TO:

Reference number:

Your request dated , refers.

1. You requested:

Personal inspection of information at registered address of public/private body (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) 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.	
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OR

2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
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 (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (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)	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

--

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:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
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		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
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 into 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

FORM 1

**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, 2017**
[Regulation 2(1)]

Note:

1. *Affidavits or other documentary evidence in support of the objection must 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.*

Reference Number....

A	DETAILS OF DATA SUBJECT	
Name and surname of data subject:		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		
B	DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (if the responsible party is a natural):		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		

Name of public or private body (if the responsible party is not a natural person):	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR OBJECTION <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....
Signature of data subject (applicant)

FORM 2

**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)**

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017
[Regulation 3(2)]

Note:

1. *Affidavits or other documentary evidence in support of the request must 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.*

Reference Number....

Mark the appropriate box with an "x".

Request for:

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

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

A		DETAILS OF THE DATA SUBJECT	
Surname:			
Full names:			
Identity number:			
Residential, postal or business address:			
			Code ()
Contact number(s):			
Fax number:			
E-mail address:			
B		DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (if the responsible party is a natural person):			
Residential, postal or business address:			
			Code ()
Contact number(s):			
Fax number:			
E-mail address:			

Name of public or private body (if the responsible party is not a natural person):	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY. (Please provide detailed reasons for the request)

* Delete whichever is not applicable

Signed at this day of20.....

.....
Signature of Data subject

FEES

Statutory prescribed and subject to amendment from time to time

	Item	Amount (R)
1.	Copy of Guide Per A4 size page	R3.90 per page
2.	Photocopy of A4-size page	R3.90 per page or part thereof
3.	Printed copy of A4-size page	R4.80 per page or part thereof
4.	Copy in a computer-readable form: 4.1 flash drive 4.2 compact disc	R0.00 R56.00
5.	Transcription of visual images per A4-size page Copy of visual images Transcription of audio record per A4-size page	Service to be outsourced. Will depend on quotation from service provider
6.	Copy of audio record	R56.00
7.	Deposit: Search and preparation exceeds 6 hours	1/3 of amount per request calculated in terms of items 1 to 6
8.	Postage	Actual expense