



PAIA and POPIA Manual for:

CB Stores Pty Ltd (Registration number: 1999/012663/07)

The Hub Pty Ltd (Registration number: 2004/033029/07)

HTC Stores Pty Ltd (Registration number: 1991/004010/07)

Decofurn Pty Ltd (Registration number: 1976/002264/07)

National Retail Holdings Pty Ltd (Registration number: 2015/403413/07)

MANUAL

as prescribed by the provisions of

THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000

And

THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

Table of Contents

1.	Definitions	3
2.	Introduction	4
3.	Purpose of the Manual	5
4.	Company details	5
5.	The Information Officer	6
6.	Availability of this PAIA and POPIA Manual	7
7.	Availability of PAIA and POPIA Guide	7
8.	Records Available in terms of any Other Legislation	8
9.	Categories of Requestors	9
10.	Categories of Data Subjects and Records held by the Company	10
11.	Processing of Personal Information in Accordance with POPIA	13
12.	Recipients of Personal Information	14
13.	Automatically available information	14
14.	Request Process	15
15.	Prescribed Request Fees	18
16.	Description of information security measures	19
17.	Transborder flows of Personal Information	20
18.	Annexures:	
	• Annexure A: Objection Form (POPIA)	21
	• Annexure B: Correction or Deletion Form (POPIA)	23
	• Annexure C: Request Form (PAIA)	25
	• Annexure D: Outcome Form (PAIA)	29
	• Annexure E: Fees	32

1. Definitions

- 1.1 **Company** means CB Stores Pty Ltd (registration number: 1999/012663/07), the Hub Pty Ltd (registration number: 2004/033029/07), HTC Stores Pty Ltd (registration number; 1991/004010/07), Decofurn (registration number: 1976/002264/07), and National Retail Holdings Pty Ltd (registration number: 2015/403413/07); all companies duly registered and incorporated with limited liability in accordance with the company laws of the Republic of South Africa and having its principal place of business situated at 20 Marshall Drive, Mount Edgecombe, 4302, Kwa-Zulu Natal, Republic of South Africa.
- 1.2 **Conditions for Lawful Processing** means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA;
- 1.3 **Constitution** means the Constitution of the Republic of South Africa, 1996;
- 1.4 **Customer** refers to any natural or juristic person that received or receives services from the Company;
- 1.5 **Data Subject** has the meaning ascribed thereto in section 1 of POPIA. That is, the person to whom personal information relates;
- 1.6 **Head of the Company** means the “head” as defined in section 1 of PAIA, clause 4;
- 1.7 **Information Officer** means the Company’s Group Chief Executive Officer (CEO) as referred to in clause 4;
- 1.8 **Information Regulator** means the regulator established in terms of POPIA and PAIA;
- 1.9 **Manual** means this manual prepared in accordance with section 51 of PAIA and regulation 4(1) (d) of the POPIA Regulations;
- 1.10 **PAIA** means the *Promotion of Access to Information Act, 2000*;
- 1.11 **Personal Information** has the meaning ascribed thereto in section 1 of POPIA. That is, information relating to an identifiable living, natural person and where it is applicable, an identifiable, existing juristic person, as defined in POPIA;
- 1.12 **Personnel** refers to any person who works for, or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Company, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;
- 1.13 **POPIA** means the *Protection of Personal Information Act, 2013*;
- 1.14 **POPIA Regulations** mean the regulations promulgated in terms of section 112(2) of POPIA;
- 1.15 **Private Body** has the meaning ascribed thereto in sections 1 of both PAIA and POPIA;
- 1.16 **Processing** has the meaning ascribed thereto in section 1 of POPIA;
- 1.17 **Responsible Party** has the meaning ascribed thereto in section 1 of POPIA;
- 1.18 **Record** has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;

- 1.19 **Requestor** has the meaning ascribed thereto in section 1 of PAIA;
- 1.20 **Request for Access** has the meaning ascribed thereto in section 1 of PAIA; and
- 1.21 **SAHRC** means the South African Human Rights Commission.

2. Introduction

The Company is committed to the observance of and compliance with the directives of the South African Constitution and national legislation which endorse the key principles of good corporate governance, transparency and accountability.

The Promotion of Access to Information Act No. 2 of 2000 (PAIA) gives effect to carry out section 32 of the South African Constitution, which focuses on the right to access information i.e. everyone has the right of access to information held by the state or a private body to enforce a culture of transparency and accountability.

Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual has to comply with.

This manual constitutes the Company's PAIA and POPIA manual. This manual is compiled in accordance with section 51 of PAIA and Section 17 of the Protection of Personal Information Act, 2013 (POPIA). POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information.

This PAIA and POPIA Manual provides an outline of the types of records and personal inform the Company holds and explains how to submit **requests for access** to these records in terms of PAIA. In addition, it explains how to **object** to the process of personal information held by the Company, or **request for correction or deletion** of the personal information, in terms of POPIA.

3. Purpose of the Manual

This Manual:

- 1.22 for the purposes of PAIA, details the procedure to be followed by a Requestor and the manner in which a Request for Access will be facilitated;
- 1.23 It sets out the procedures and requirements to meet such requests, as well as the grounds for refusal or partial refusal; and
- 1.24 for the purposes of POPIA, amongst other things, details the purpose for which Personal Information may be processed; a description of the categories of Data Subjects for whom the Company Processes Personal Information as well as the categories of Personal Information relating to such Data Subjects; and the recipients to whom Personal Information may be supplied.

4. Company Details

The details of the Companies are as follows:

Physical Address:	20 Marshall Drive Mount Edgecombe 4302 Kwa-Zulu Natal
Postal Address:	Private Bag X03 Mount Edgecombe 4300
Telephone Number:	+27 (0) 31 582 1000
Website:	www.hub.co.za www.CBstores.co.za

5. The Information Officer [Section 51(1)(b)]

The Act prescribes the appointment of an Information Officer for public bodies where such Information Officer is responsible to, inter alia, assess request for access to information. The head of a private body fulfils such a function in terms of section 51. The Company has opted to appoint an Information Officer to assess such a request for access to information as well as to oversee its required functions in terms of the Act.

The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer oversees the functions and responsibilities as required for in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act 4 of 2013 after registering with the Information Regulator.

The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is in order to render the Company as accessible as reasonable possible for requests of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013. All request for information in terms of this Act must be in writing and must be addressed to the Information Officer.

Contact Details of the Information Officer:

Information Officer:	Gregory Veale (Group CEO)
Physical Address:	20 Marshall Drive, Mount Edgecombe, KwaZulu Natal, 4302
Telephone Number:	+27 31 582 1000
Email:	popia@decofurn.co.za

Contact Details of the Deputy Information Officers:

Information Officers:	Andrew Halgreen Bruce Morgan Cheryl Donnelly Chantel Damon Michelle Clinton-Baker
Physical Address:	20 Marshall Drive, Mount Edgecombe, KwaZulu Natal, 4302
Telephone Number:	+27 31 582 1000
Email:	popia@decofurn.co.za

6. Availability of this PAIA and POPIA Manual

This manual is published on the Company website or alternatively, a copy can be requested from the Company's principal place of business during working hours (see Section 4). A hard copy will be provided upon request and upon payment of appropriate fees. The manual will be available to the Information regulator upon request.

7. Availability of PAIA and POPIA Guide

Section 10 of the Act requires the Information Regulator to update and make the existing guide that was compiled by the South African Human Rights Commission ("the Guide") containing such information, (in an easily comprehensible form and manner) available, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide must include a description of the following (amongst others):

- (a) Object of PAIA, as well as POPIA;
- (b) Manner and form of a request for access to a record of either a public or private body;
- (c) Assistance available from the IO/DIO of a private body;
- (d) Assistance available from the Information Regulator in terms of PAIA and POPIA;
- (e) Remedies available in terms of law for any act or failure to act in respect of a duty imposed by PAIA or POPIA;

- (f) Provisions requiring a public or private body to compile this Manual and how to access it;
- (g) Notices regarding fees payable for requests for access; (h) Any regulations issued under section 92 of PAIA.

For a copy of the Guide in English or Afrikaans please go to Company website. A copy of the Guide in all official languages can be obtained from the Information Regulator who may be contacted at:

The Information Regulator	
Physical address:	JD House, 27 Stiemens Street, Braamfontein Johannesburg 2001
Postal address:	P.O Box 31533 Braamfontein Johannesburg 2017
Telephone:	+27 (0) 10 023 5200
Website:	https://www.justice.gov.za/inforeg/index.html
E-mail:	inforeg@justice.gov.za

8. Records Available in terms of any Other Legislation

Where applicable to its operations, the Company also retains records and documents in terms of the legislation 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 the Act; 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 done in accordance with the prescriptions of the Act.

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of South Africa Act 108 of 1996
- Consumer Protection Act 68 of 2009

- Copyright Act 98 of 1987
- Criminal Procedure Act 51 of 1977
- Currency & Exchanges Act 9 of 1933
- Customs and Excise Act 91 of 1964
- Electronic Communications and Transactions Act 2 of 2000
- Employment Equity Act 55 of 1998
- Financial Advisory & Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Formalities In Respect of Leases of Land Act 18 of 1969
- Health Act 63 of 1977
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Long Term Insurance Act 52 of 1998
- National Credit Act 34 of 2005
- National Water Act 36 of 1998
- Occupational Health and Safety Act 85 of 1993
- Patents Act 57 of 1987
- Pension Funds Act 24 of 1956
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protected Disclosures Act 26 of 2000
- Regulation of Interception of Communications and Provisions of Communication Related Information Act 70 of 2002
- Short-Term Insurance Act 53 of 1998
- Skills Development Act 97 of 1997
- Skills Development Levies Act 9 of 1999
- Trademarks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Fund Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

9. Categories of Requestors

The capacity under which a Requestor makes a request for records defines the category in which the Requestor will fall into. There are four categories of Requestors:

- A Data Subject who makes requests about themselves;
- A Representative who makes a request on behalf of the Data Subject(s);
- A Third Party who requests information about a Data Subject; or
- A Public Body who requests information in the public interest.

10. Categories of Data Subjects and Records held by the Company

This manual sets out a description of the subjects on which the Company holds records, and categories of records held on each subject. These include operational records utilised in the day to day running and administration of the business. Access to the listed records /information per Appendix B does not guarantee access requests will be approved / granted.

Categories of Data Subjects:

Category of Data Subject	Main categories of Personal Information processed
Customers	Name, contact information, identification information, employment information, banking details, credit information, marketing preferences and other information shared with The Hub/CB Stores by customers (e.g. via social media or product reviews) and any other information required to carry out a legal duty or contractual obligation.
Employees	The same categories as customers but includes other information relating to the employment and possible employment relationship with the Company, and any other information required to carry out a legal duty or contractual obligation.
Suppliers, service providers, independent contractors and third parties	Name or company information, contact information, banking details and any other information required to carry out a legal duty or contractual obligation.

Categories of Records:

Business Information	
Documents of Incorporation	Memorandum of Incorporation
Minutes of Board of Directors Meetings	Appointment of Directors/Auditors/Secretaries
Public Officer and other Prescribed Officers	Share Register and other Statutory Registers
Management Reports	Strategic and Business Plans
Annual integrated Reports	Services and Products (incl. pricing)
Records held in compliance to specific legislation, regulations and codes	
Finance and Accounting	

Annual Financial Statements	Tax Records (company and individual employees)
Accounting Records	Banking Records Banking Statements
Paid Cheques	Electronic Bank Records
Asset Register	Rental Agreements
Invoices	General Correspondence
Management Accounts and Records	Budgets
Insurance	Share Register
Financial Transactions	Purchase and Order Records
Banking Records	Contracts
Financial Policies and Procedures	Risk Management Records
Internal Audit Records	Statutory Returns Records
Income Tax records	
Pay As You Earn (PAYE) Records	Documents Issued to Employees for Income Tax
Payments to SARS on Behalf of Employees	Statutory Records
Human Resources	
Personal Information e.g. name, surname, ID, race, gender, age, disability, contact numbers, address	Banking and financial details
Employment Contracts	Employment Equity Plan and Reports
Medical Aid Records	Retirement Fund Records
Salary Records	Disciplinary Records
Assessments	Leave Records
Training Records and Manuals	
Background Check (credit checks)	
Environmental Health and Safety	
Environmental Assessments	Accident Investigation Reports
Safety Organizational Structures	Policies and Procedures
Information Relating to the Fire Systems	Machinery Tests Records
Contractor Agreements	CCTV Footage
Operations (Sales)	
Customer Information	Sales Policies Procedures
Sales Forecasts	General Correspondence
Product Sales Records/ Statistics	Customer Complaints
Laybye Information	Loyalty Card Details
Logistics	

Information Relating to Freight Agents	Inventory
Shipping Information	Delivery Plans
Policies and Procedures	General Correspondence
Customs Documentation	
Information Technology (IT)	
IT Policies and Procedures	Network Diagrams
Configuration Setups	User Manuals
System Performance Records	General Correspondence
Asset Registers - IT related hardware and software	User Awareness
Security Certifications	Privacy Programme
Project Plans	Biometrics information of employees
Marketing	
Statistical Information on the Market	Loyalty Information
Customer Profiling / Purchase Information	Historical Records of Promotions
Information on Promotions, Products and Suppliers	Strategic Marketing Campaign Documents
Customers and Prospective customers	
Title and name	Postal and street addresses
Contact numbers and/or email address	Personal information: e.g. age, gender, race, nationality, language, ID
Information on Promotions, Products and Suppliers	Strategic Marketing Campaign Documents
Vendors, Suppliers and Other Businesses	
Identity and/or Company information and directors' info	Banking and financial information
Contact numbers and/or email address	Information about products or services
Other info not specified, reasonable required to be processed for business operations	

**Although the Company has applied its best efforts to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to the Company's attention that existing or new legislation allows a Requestor access on a basis other than as set out in PAIA, the Company shall update the list accordingly. If a Requestor believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requestor is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.*

11. Processing of Personal Information in Accordance with POPIA

Purpose of processing:

In terms of POPIA, data must be processed for a specified purpose. The purpose for which data is processed by the Company will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

In general, personal information is processed for purposes of on-boarding customers and suppliers, service or product delivery, records management, security, employment and related matters.

For customers:

- a. Performing duties in terms of any agreement with customers.
- b. Making, or assisting in making, credit decisions about customers.
- c. Operating and managing customer's accounts and managing any application, agreement or correspondence customers may have with the Company.
- d. Communicating (including direct marketing) with customers by email, SMS, letter, telephone or in any other way about the Company's products and services, unless customers indicate otherwise.
- e. Forming a view of customers as individuals and to identify, develop or improve products, which may be of interest to customers.
- f. Carrying out market research, business and statistical analysis.
- g. Performing other administrative and operational purposes including the testing of systems.
- h. Complying with the Company's regulatory and other obligations
- i. Any other reasonably required purpose relating to the Company's business.

For prospective customers:

- a. Verifying and updating information
- b. Pre-scoring.
- c. Direct marketing.
- d. Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Company's business.

For employees:

- a. The same purposes as for customers (above).
- b. Verification of applicant employees' information during recruitment process.
- c. General matters relating to employees, for example: pension, medical aid, payroll, disciplinary action and training.

- d. Any other reasonably required purpose relating to the employment or possible employment relationship.

For vendors /suppliers /other businesses:

- a. Verifying information and performing checks:
- b. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties:
- c. Payment of invoice:
- d. Complying with the Company's regulatory and other obligations; and
- e. Any other reasonably required purpose relating to the Company's business.

12. Recipients of Personal Information

The following categories of recipients (with a legitimate need to know and process Personal Information for operational requirements) may receive Personal Information:

- suppliers, service providers and third parties as required for The Hub/Cb Stores' business to function
- credit bureaus
- regulators, government authorities and ombudsmen
- financial institutions
- employees
- pension fund and medical aid administrators
- anyone making a successful application for access in terms of PAIA or POPIA

13. Automatically available information

Information that is obtainable via the Company website about the Company is automatically available and need not be formally requested in terms of this manual.

The following categories of records are automatically available for inspection, purchase or photocopying:

- brochures
- press releases
- publication; and
- various other marketing and promotional material.

14. Request Process

POPIA provides that a data subject may, upon proof of identity, request the Company to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information. POPIA provides that a data subject may object, at any time, to the processing of personal information by the Company, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing.

A data subject may also request the Company to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that the Company is no longer authorised to retain in terms of POPIA's retention and restriction of records provisions.

A data subject who wishes to:

- object to the processing of their personal information must complete the form attached hereto as **Annexure A** and;
- request a correction or deletion of personal information or the destruction or deletion of a record of personal information must complete the form attached hereto as **Annexure B** and submit it to the Information Officer (detail in Section 5).

REQUESTING INFORMATION FROM THE COMPANY

- The Requestor should **contact the Company's Information Officer** to obtain guidance on the process to follow when sending documentation containing personal information. This includes application forms and proof of identification documents.
- The **prescribed form** must be used and completed to make the request for access to a record (refer to **Annexure C**). The form may also be downloaded from the Department of Justice website.
- If an individual is unable to complete the prescribed form because of a disability or illiteracy, such a person may make a request orally.
- Proof of **identification** of the Requestor (and related third parties acting on behalf of the Requestor) must be provided on submitting the request form.
- The requestor must specify the **right that they are seeking to protect** or that they wish to exercise and provide an explanation as to why the requested records are required for the protection or exercise of that right.

- If the request is made on behalf of another person, then proof is required of the capacity in which the requestor is making the request.
- **Proof of identity** must be provided in the form of a certified copy of the Requestor's and/or delegate's identity document or passport via secure methods provided by the Information Officer in the initial correspondence.
- An initial response to a request will take approximately **30 days**. The Information Officer may **extend** the period by an additional 30 days depending on the complexity of the request requirements.
- The response will be in writing as per form (**Annexure D**).
- Please note that an application for access to information can be **refused** in the event that the application does not comply with the requirements of PAIA and/or POPIA.
- The successful completion and submission of the access request does not automatically allow the Requestor access to the requested records.
- If access to a record/information is granted, the Requestor will be **notified**, and the notification will include the following:
 - An indication of the access fee that should be paid upon gaining access (if any).
 - An indication of the form in which the access will be granted.
- If access to a record/information is denied, the Requestor will be notified and given adequate reason/s for the refusal.

GROUNDINGS FOR REFUSAL OF ACCESS TO RECORDS IN TERMS OF PAIA

The following are the grounds on which the Company may, subject to the exceptions contained in Chapter 4 of PAIA, refuse a Request for Access in accordance with Chapter 4 of PAIA:

- Records that cannot be found or that do not exist;
- mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
- mandatory protection of the commercial information of a third party, if the Records contain:
 - trade secrets of that third party;
 - financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - information disclosed in confidence by a third party to the Company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;
 - mandatory protection of confidential information of third parties if it is protected in terms of any agreement;

- mandatory protection of the safety of individuals and the protection of property;
- mandatory protection of Records that would be regarded as privileged in legal proceedings;
- protection of the commercial information of the Company, which may include:
 - trade secrets;
 - financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Company;
 - information which, if disclosed, could put the Company at a disadvantage in contractual or other negotiations or prejudice the Company in commercial competition; and/or
 - computer programs which are owned by the Company, and which are protected by copyright and intellectual property laws;
- research information of the Company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
- Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

INFORMATION OR RECORDS NOT FOUND

If the Company cannot find the records that the Requestor is looking for despite reasonable and diligent search and it believes either that the records are lost or that the records are in its possession but unattainable, the Requestor will receive a notice in this regard from the Information Officer in the form of an affidavit setting out the measures taken to locate the document and accordingly the inability to locate the document.

REMEDIES AVAILABLE TO THE REQUESTOR UPON REFUSAL OF A REQUEST FOR ACCESS IN TERMS OF PAIA

The Company does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and Requestors will have to exercise such external remedies at their disposal if the Request for Access is refused.

A requestor or third party who is dissatisfied with the Information Officer's refusal to disclose information, may within 180 days of the decision, submit a complaint to the Information Regulator. After exhausting the complaints procedure with the Information Regulator, they may apply to the Court for relief.

LOGGING OF A COMPLAINT TO INFORMATION REGULATOR

The following person may lodge a complaint;

1. A data subject whose personal information has been interfered with in terms of Section 73 of POPIA;
2. Any person acting on behalf of data subject whose personal information has been interfered with, as referred to in Section 73 of POPIA;
3. Any person with sufficient personal interest in the subject matter of the complaint referred to in Section 73 of POPIA;
4. A responsible party or data subject aggrieved by the determination of an adjudicator in terms of Section 63(3) of POPIA; and
5. Any person acting in the public interest.

Please note:

- The complaint must be submitted to the Information Regulator on the prescribed form, COMPLAINT FORM 5 (Regulation 10). This form is available on the website of the Regulator (<https://www.justice.gov.za/infoereg/>) and is available at the offices or designated offices of the Regulator during office hours.
- A complaint to the Regulator by a requestor or third party must be lodged within 180 days of receipt of the decision from the Company.
- If a requestor or third party is challenging the decision of an Information Officer of a private body, he/she needs to provide sufficient evidence to prove that the record requested is required for the exercise or protection of any other right(s).

15. Prescribed Request Fees

Please refer to **Annexure E** for Company's fee structure.

Please note that:

- An application fee of R140.00 is payable in respect of each application for information. Proof of payment of said fee must accompany the completed application form.
- No fees are payable by persons requesting information pertaining to their own affairs / personal information.

16. Description of information security measures

The Company undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. The Company may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

- **Access Control of Persons:** The Company shall implement suitable measures in order to prevent unauthorised persons from gaining access to the data processing equipment where the data are processed.
- **Data Media Control:** The Company undertakes to implement suitable measures to prevent the unauthorised manipulation of media, including reading, copying, alteration or removal of the data media used by the Company and containing personal data of customers.
- **Data Memory Control:** The Company undertakes to implement suitable measures to prevent unauthorised input into data memory and the unauthorised reading, alteration or deletion of stored data.
- **User Control:** The Company shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.
- **Access Control to Data:** The Company represents that the persons entitled to use the Company's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).
- **Transmission Control:** The Company shall be obliged to enable the verification and tracing of the locations/destinations to which the personal information is transferred by utilisation of the Company's data communication equipment/devices.
- **Transport Control:** The Company shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorised persons during the transmission thereof or during the transport of the data media.

- **Organisation Control:** The Company shall maintain its internal organisation in a manner that meets the requirements of this manual.

17. Transborder flows of Personal Information

The Company has not planned transborder flows of personal information. However, should it become necessary to do so, the Company will ensure that anyone to whom it passes personal information is subject to data-protection laws which are similar to those of South Africa. The Company will at all times act in accordance with PAIA and POPIA.

Annexure A: Objection Form (POPIA)

FORM 1 - OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF POPIA

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection 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 is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, 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:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	

C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....

Signature of data subject/designated person

Annexure B: Correction or Deletion Form (POPIA)

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, 2018

[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 is applicable.*

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
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, 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:	

Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED
D	<p>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or</p> <p>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</p> <p><i>(Please provide detailed reasons for the request)</i></p>

Signed at this day of20.....

.....
Signature of data subject/ designated person

Annexure C: Request Form (PAIA) (may also be found on <https://www.justice.gov.za/inforeg/>)

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 Email Fax

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	Tel (W)		Facsimile		Cell
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 (W)		Facsimile		Cell

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

(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
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

(Mark the applicable box with an "X")

Printed copy of record (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 record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	

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>	
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)	A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
b)	You will be notified of the amount required to be paid as the request fee.
c)	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.
d)	If you qualify for exemption of the payment of any fee, please state the reason for exemption

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 OFFICAL 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

Annexure D: Outcome Form (PAIA)

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 Guide/portion of the Guide/record, will only be released once proof of full payment is received.
2. 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 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>	
--	--

which 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 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 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>	

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>	
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

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
The request fee payable by every requestor	R140.00		
Photocopy	R2.00		
Printed copy	R2.00		
Copy in a computer-readable form on: a) Flash drive b) Compact disc	a) R40.00 b) R60.00		
Transcription of visual Images	Service to be outsourced Will depend on quotation from Service Provider.		
Copy of visual images			
Transcription of an audio record			
Copy of an audio record	R60.00		
To search for and prepare record for each hour or part of an hour, excluding the first hour.	R145		

Postage	Actual cost		
Deposit: If search exceeds 6 hours	One third of the amount (calculated in terms of items above)		
TOTAL:			

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

Yes

No

Hours of search		Amount of deposit <i>(Calculated on one third of total amount per request)</i>	
-----------------	--	---	--

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 _____ on this day _____ of _____ 20_____

Information Officer

Annexure E: Fees

- Where a Requestor submits a request for access to information held by the Company relating to a person other than the Requestor, a request fee in the amount of R140.00 is payable up-front. Upon receipt of payment, the Company will further process the received request.
- If access to a record/s is granted by the Company, the Requestor may be required to pay an access fee for the search for, the preparation and for the re-production of the record/s. The access fees which apply are set out below.
- The Company, as a registered Private Body, will add VAT to all aforementioned fees in terms of the Value Added Tax (VAT) Act.
- A Requestor may lodge a complaint with a court of law against the payment of the request fee.
- All payments shall be made in the form of an Electronic Funds Transfer (EFT) to the Company bank account. Banking details to be obtained from the Company's Information Officer.
- The Company is entitled to withhold a record until the required access fees have been paid. The applicable access fees which will be payable are:
- Where the Company receives a request for access to information held on a person other than the Requestor himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record/s of disclosure will take more than 6 (six) hours, a deposit is payable by the Requestor.
- The Requestor may make an application to Court to be exempted from the requirement to pay this deposit.
- If a deposit is made and access to the record/s requested is subsequently refused, the deposit will be repaid to the Requestor. The amount of the deposit is equal to a 1/3 (one third) of the amount of the applicable access fee.

Fees in Respect of Private Bodies

	Description	Amount
1.	The request fee payable by every requestor	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: (i) Flash drive (to be provided by requestor) (ii) 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: (i) Flash drive (to be provided by requestor) (ii) 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.