

Manual in terms of the Promotion
of Access to Information Act, 2000
and the Protection of Personal Information Act, 2013

of

Clyde and Co Incorporated
(Registration No. 2014/107150/21)
(the **Company**)

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PAIA & POPIA Manual – Clean Updated Draft (2025)

This updated Manual of Clyde & Co Incorporated has been revised in September 2025 to ensure compliance with the Promotion of Access to Information Act, 2000 (PAIA) and the Protection of Personal Information Act, 2013 (POPIA). It replaces all references to the South African Information Regulator (South Africa) (Information Regulator (South Africa)) with the Information Regulator (South Africa) and incorporates new obligations relating to direct marketing, breach notifications, and operator agreements. Security safeguards have been updated to include encryption, incident response, role-based access control, and employee training.

Last Reviewed: 01 September 2025 | Next Review: 01 September 2026.

Contact Information

Information Regulator (South Africa)

Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Tel: 010 023 5200

Email: PAIAComplaints@inforegulator.org.za / POPIAComplaints@inforegulator.org.za

Website: www.inforegulator.org.za

1 Definitions and interpretation

1.1 Definitions

In this Manual, unless the context otherwise requires, the following definitions apply:

Company means Clyde & Co Incorporated (registration number: 2014/107150/21), a personal liability law firm incorporated in terms of the laws of South Africa;

Conditions for Lawful Processing means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA and in paragraph 13 of this Manual;

Constitution means the Constitution of the Republic of South Africa, 1996;

Data Subject has the meaning ascribed thereto in section 1 of POPIA;

Employees 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;

Information Officer means the duly authorised by the head as defined in section 1 of PAIA of the Company, being Athol Gordon or his deputy Christopher MacRoberts;

Information Regulator means the Information Regulator established in terms of section 39 of POPIA;

Manual means this manual prepared in accordance with section 51 of PAIA and regulation 4(1)(d) of the POPIA Regulations;

PAIA means the Promotion of Access to Information Act 2 of 2000;

Personal Information has the meaning ascribed thereto in section 1 of POPIA;

POPIA means the Protection of Personal Information Act 4 of 2013;

POPIA Regulations mean the regulations promulgated in terms of section 112(2) of POPIA;

Private Body has the meaning ascribed thereto in sections 1 of both PAIA and POPI;

Processing has the meaning ascribed thereto in section 1 of POPIA;

Responsible Party has the meaning ascribed thereto in section 1 of POPIA;

Record has the meaning ascribed thereto in section 1 of PAIA

Requestor has the meaning ascribed thereto in section 1 of PAIA;

Request for Access has the meaning ascribed thereto in section 1 of PAIA; and

Special Personal Information means Personal Information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information and criminal behaviour.

- 1.2 Capitalised terms used in this Manual have the meanings ascribed thereto in section 1 of POPIA and PAIA as the context specifically requires, unless otherwise defined herein.

2 **Background to PAIA**

- 2.1 PAIA seeks to give effect to the constitutional right to access information as specified in Section 32 of the Constitution of the Republic of South Africa. The Act seeks to advance the values of transparency and accountability.

- 2.2 PAIA establishes several statutory rights of Requestors to access a record(s) of the Company if:

- (a) the record(s) is required for the exercise or protection of any rights;
- (b) the Requestor complies with all of the procedural requirements; and
- (c) access is not refused in terms of any ground referred to in PAIA.

- 2.3 One of the requirements specified in PAIA, is the compilation of a Manual that provides information, including the types and categories of records held by the Company and which may, subject to compliance with the procedural requirements, be subject to access by a Requestor.

- 2.4 PAIA came into operation on 23 November 2001 and the majority of the provisions of POPIA finally came into effect on 1 July 2020, subject to a 12-month grace period, within which responsible parties were required to take steps to comply with its provisions.

- 2.5 Section 51 of PAIA requires that all Private Bodies compile a manual giving information to the public regarding the procedure to be followed in requesting information from such bodies for the purpose of exercising or protecting rights. The Company is a Private Body as defined in PAIA.

- 2.6 The purpose of this Manual is to:

- (a) detail the procedure to be followed by a Requestor in order for the Company to facilitate requests for access to records of the Company in terms of PAIA; and

- (b) details the purpose for which Personal Information may be processed; a description of the categories of Data Subjects to whom the Personal Information relates as well as the categories of Personal Information; the recipients to whom Personal Information may be supplied, any planned transborder flows of Personal Information and a general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the Company.
- 2.7 This manual does not comprehensively deal with every procedure provided for in PAIA. Requestors of information are advised to familiarise themselves with the provisions of the Act before making any requests to the Company in terms of PAIA.
- 2.8 The Company makes no representation and gives no undertaking or warranty that the information provided by it to a Requestor is complete or accurate, or that such information is fit for any purpose. All users of such information shall use such information entirely at their own risk, and the Company shall not be liable for any loss, expense, liability or claims, howsoever arising, resulting from the use of this manual or any information provided by the Company or any error therein.
- 3 **Introduction to the Company**
 - 3.1 **Nature of Business and General Information:**
 - 3.1.1 The Company is one of the largest international law firms operating in South Africa, with a strong presence in Johannesburg and Cape Town. The Company is South Africa's leading insurance law firm and is also highly regarded for its expertise and experience in the infrastructure and construction sectors. The Company's lawyers advise domestic and international clients including insurers, reinsurers, banks, brokers and underwriting managers, across all lines of insurance and reinsurance business. The Company's insurance and reinsurance expertise include aviation, financial institutions and D&O, healthcare, industrials, mining, marine, personal injury, power, product and public liability, professional negligence, and property.
 - 3.1.2 The Company has compiled this Manual, not only to comply with the provisions of PAIA and POPIA, but also to foster a culture of transparency and accountability in our environment and to ensure that members of the public have effective access to information in our possession which will assist them in the exercise and protection of their rights. Where information requested is not immediately available, we will endeavour to make it available in a timely manner insofar as that is reasonably practicable in the circumstances.

4 **Contact Details**

4.1 **The Company**

Full Name:	Clyde & Co Incorporated
Registration Number:	2014/107150/21
Registered Address:	4th Floor North Wing, Nedbank Building, Clock Tower Precinct, Victoria & Alfred Waterfront, Cape Town 8001, South Africa
Main Business Address:	52 Katherine Street, Wierda Valley, Sandton, Johannesburg, 2196, South Africa
Postal Address:	P.O. Box 786448, Sandton, Docex 79, Sandton Square, 2196

Telephone Number: 010 286 0350
Fax Number: 010 286 0399
Cape Town Office: 4th Floor, North Wing, Nedbank Building, Clock Tower
Precinct, Victoria & Alfred Waterfront, Cape Town
8001, South Africa
Postal Address: P O Box 774, Cape Town, 8000
Telephone Number: [021 285 0350](tel:0212850350)

4.2 **The Managing Director (Head of the Company)**

Managing Director: Tony Hardie
Telephone Number: 010 286 0350 (Switchboard)
Fax Number: 010 286 0399
Email Address: Tony.Hardie@clydeco.com

4.3 **Information Officer**

Information Officer: Athol Gordon
Telephone Number: 021 286 0359
Fax Number: 021 286 0399
Email Address: SAInformationOfficer@clydeco.com
Deputy Information Officer: Christopher MacRoberts

5 **Availability of the Manual**

- 5.1 This manual is available for inspection during office hours at the Johannesburg and Cape Town offices of the Company free of charge. To arrange for an inspection of the manual, please contact the Information Officer.
- 5.2 Additionally, the manual can be viewed on the Company Website at:
www.clydeco.com

6 **The Official Guide**

- 6.1 Section 10 of PAIA requires the Information Regulator (South Africa) (Information Regulator (South Africa)), the previous authority enforcing and implementing data subject access rights to publish a guide containing information reasonably required by a person wishing to exercise or protect any right in terms of PAIA.
- 6.2 The Guide that has been published contains the following information:
- (a) the object of PAIA;
 - (b) particulars of the information;
 - (c) the manner and form of a Request for Access to information held by a Private Body;
 - (d) assistance available from both the Information Officer and the Information Regulator (South Africa) in terms of PAIA;

- (e) all remedies in law regarding acts, omissions, rights and duties, including how to lodge an internal appeal and a court application;
- (f) schedules of fees to be paid in relation to requests for access to information; and regulations made in terms of PAIA.

A copy of this Guide is available for inspection at the offices of Information Regulator (South Africa) situated at Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191, Gauteng, South Africa and on the website www.inforegulator.org.za

6.3 Contact details are as follows:

Post: Information Regulator (South Africa)
Promotions of Access to Information Act Unit
Research and Documentation Department
Private Bag X2700
Houghton 2041

Telephone: 011 877 3600

Fax: 011 403 0668

Website: www.inforegulator.org.za or www.section51.paia@inforegulator.org.za

E-mail: PAIA@inforegulator.org.za

7 Information Available in terms of PAIA

7.1 The Company holds the following categories of information which will be available for inspection in terms of PAIA. The procedure in terms of which such Records may be requested from the Company is set out in paragraph 9 of this Manual. The Records listed below will not in all instances be provided to a Requestor who requests them in terms of PAIA as the Requestor is required to identify the right the Requestor is seeking to exercise or protect and provide an explanation of why the requested Record is required for the exercise or protection of that right. Furthermore, the request may be denied on the basis of the grounds of refusal under PAIA.

7.2 Categories of records and description of records held:

7.2.1 Statutory information/records

- (a) records of minutes, as well as resolutions passed (where applicable);
- (b) memorandum & articles of association, copies of all forms lodged with the CIPC;
- (c) directors register.

7.2.2 Financial records (where applicable)

- (a) tax records;
- (b) debtors' records;
- (c) creditors' records;
- (d) insurance records;
- (e) auditors' reports;

- (f) interim and annual financial statements;
- (g) bank statements and other banking records;
- (h) invoices issued in respect of debtors and billing information;
- (i) records regarding the company's financial commitments.

7.2.3 Accounting records

- (a) books of account including journals and ledgers;
- (b) delivery notes, orders, invoices, statements, receipts and vouchers.

7.2.4 Taxation records

- (a) employee tax information;
- (b) company tax information.

7.2.5 Statutory employee records including internal policies and procedures

- (a) personnel records of employees;
- (b) conditions of employment;
- (c) employment contracts;
- (d) employment policies and procedures;
- (e) remuneration paid to each Employee;
- (f) salary and wage register and other payroll records;
- (g) registrations with Department of Labour, Unemployment Insurance Fund, Compensation Fund and in terms of the Skills Development Levies Act;
- (h) records of Unemployment Insurance Fund contributions;
- (i) records regarding group life assurance and disability income protection;
- (j) provident fund records;
- (k) health and safety records;
- (l) workplace skills plans;
- (m) codes of conduct;
- (n) grievance procedure;
- (o) training schedules and material;
- (p) correspondence relating to employees;
- (q) remuneration policy, performance appraisal, recruitment, selection, advertising of positions, appointments, retirement, promotions, leave, salaries, overtime, bonuses, medical aid, health and safety, use of Company resources including telephones, motor vehicles and computers;
- (r) internal evaluation and disciplinary records;
- (s) Legal Professional Council Certificates;

- (t) application forms (loans, leave, etc); and
- (u) other internal records.

7.2.6 Movable property (where applicable)

- (a) Asset register.

7.2.7 Agreements and contracts

- (a) All agreements of a material nature

7.2.8 Fixed asset register (where applicable)

7.2.9 Administration, secretarial and legal records (where applicable)

- (a) Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation;
- (b) Settlement agreements;
- (c) Shareholder records;
- (d) Share register;
- (e) Minutes of meetings of directors;
- (f) Records relating to the incorporation of the Company;
- (g) Minutes of meetings of committees and sub-committees;
- (h) Powers of attorney;
- (i) Records of litigation / arbitration proceedings;
- (j) Title deeds;
- (k) Mortgage bonds;
- (l) Trademark, copyright, patent, service mark certificates and registrations;
- (m) Material licences, permits and authorisations.

7.2.10 Insurance

- (a) Insurance policies;
- (b) Claim records; and
- (c) Details of insurance coverage, limits and insurers.

7.2.11 Information Technology

- (a) Hardware;
- (b) Operating systems and other operational Records;
- (c) Telephone and other lines;
- (d) Software packages;
- (e) Agreements;
- (f) Support and maintenance agreements; and

- (g) User manuals and licences.
- 7.2.12 Sales, advertising, promotional and marketing materials
- 7.2.13 Databases
- 7.2.14 Product records
- 7.2.15 Research, Learning & Development records
- 7.2.16 Records pertaining to health and safety and the environment.
- 8 **Records held by the Company in terms of other legislation as contemplated in section 51 (1)(d) of PAIA**
- 8.1 The following information is available in terms of the following legislation, persons or entities specified in such legislation:
 - (a) Basic Conditions of Employment Act, No. 75 of 1997
 - (b) Companies Act, No. 71 of 2008
 - (c) Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
 - (d) Constitution of the Republic of South Africa, 1996
 - (e) Copyright Act No 114 of 1998
 - (f) Debt Collectors Act, No. 114 of 1998
 - (g) Electronic Communications Act No. 36 of 2005
 - (h) Electronic Communications and Transactions Act, No. 25 of 2002
 - (i) Employment Equity Act, No. 55 of 1998
 - (j) Financial Intelligence Centre Act, No. 38 of 2001
 - (k) Income Tax Act, No. 58 of 1962
 - (l) Labour Relations Act, No. 66 of 1995
 - (m) Legal Practice Act No 28 of 2014
 - (n) National Credit Act. 34 of 2005
 - (o) Medical Schemes Act, No. 131 of 1998
 - (p) Occupational Health & Safety Act, No. 85 of 1993
 - (q) Pensions Fund Act, No. 24 of 1956
 - (r) Promotion of Access to Information Act No. 2 of 2000
 - (s) Protection of Personal Information Act, No. 4 of 2013
 - (t) Skills Development Act, No. 97 of 1998
 - (u) Skills Development Levies Act, No. 9 of 1999
 - (v) Tax on Retirement Funds Act, No. 38 of 1996
 - (w) Unemployment Insurance Act, No. 63 of 2001

- (x) Unemployment Insurance Contributions Act, No. 4 of 2002
- (y) Value Added Tax Act, No. 89 of 1991
- (z) Cybercrimes Act, No. 19 of 2020

Note, whilst all reasonable endeavours have been made to provide a complete list of applicable legislation above, it is possible that the above list may be incomplete. Wherever it comes to the Company's attention that existing or new legislation allows a Requestor access on a basis other than that set out in the Act, the above list will be updated.

9 Procedure for requesting access to information in terms of PAIA

- 9.1 A request from a Data Subject must comply with all the procedural requirements as contained in section 53 of PAIA relating to a Request for Access to a Record. These procedural requirements are set out in this section.
- 9.2 If a Requestor wishes to request access to any of the aforementioned categories of information, s/he is required to complete a request form as set out in Annexure A hereto. These forms are also available from:
 - (a) our Information Officer (whose contact details are detailed in this Manual);
 - (b) the Information Regulator website
www.inforegulator.org.za
- 9.3 A Requestor may also be called upon to pay the additional fees prescribed by regulation for searching for and compiling the information that is requested, including copying charges.
- 9.4 It is important to note that access is not automatic – the Requestor must identify the right in seeking protection and explain why the record requested is required for exercise or protection of that right. The Request for Access form must be completed with enough particularity to at least enable the Information Officer to identify the following:
 - (a) the Record/s requested;
 - (b) identity of the Requestor;
 - (c) the form of access that is required, if the request is granted;
 - (d) the email address, postal address or fax number of the Requestor; and
 - (e) the right that the Requestor is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.
- 9.5 The Requestor will be notified in the manner indicated by him/her/it on the Request for Access form whether or not his/her/its request has been approved.
- 9.6 The completed request must be submitted, together with the prescribed fee and where applicable a certified copy of the Requestor's certified identity document, to the Information Officer at the postal or physical address or electronic mail address recorded above. Payment details can be obtained from the Information Officer and can be made via direct deposit.
- 9.7 The Company will process the Request for Access and notify the Requestor of the decision within 30 days of receipt of the Request for Access, unless the Request for

Access is of such a nature that an extension of the prescribed time limit is necessitated in accordance with section 57 of PAIA. In the case of an extension of the time limit, the Requestor has the right to lodge a complaint with the Information Regulator in accordance with POPIA by completing the form prescribed by POPIA.

- 9.8 If, in addition to a written reply from the Information Officer, the Requestor wishes to be informed of the decision on the Request for Access in any other manner, the Requestor must state the manner and the particulars so required.
- 9.9 If a Request for Access is made on behalf of another person, the Requestor must submit proof of the capacity in which the Requestor is making the request to the reasonable satisfaction of the Information Officer.
- 9.10 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 9.11 The Company will voluntarily provide the requested Records to a Data Subject. The prescribed fee for reproduction of the Record requested by a Data Subject will be charged in accordance with section 54(6) of PAIA and Annexure B below.

10 **Grounds for refusal**

- 10.1 There are various grounds upon which the Company may or must refuse a Request for Access to a Record in accordance with Chapter 4 of PAIA. They are:
 - (a) the protection of privacy of a third person (who is a natural person, including a deceased person) from unreasonable disclosure (section 63 of PAIA);
 - (b) the protection of commercial information of a third party if the Records contain trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party (section 64 of PAIA);
 - (c) refusing access to a Record if disclosure would result in the breach of a duty of confidence owed to a third party (section 65 of PAIA);
 - (d) refusing access to a Record if it would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person (section 66 of PAIA);
 - (e) refusing access to a Record that was produced during legal proceedings, unless that legal privilege has been waived (section 67 of PAIA);
 - (f) refusing access to a Record containing trade secrets, financial or sensitive information or any information that would put the private body at a disadvantage in negotiations or prejudice it in commercial competition (section 68 of PAIA);
 - (g) refusing access to a Record containing information about research being carried out or about to be carried out on behalf of a third party (section 69 of PAIA).
- 10.2 Section 70 of PAIA contains an overriding provision. Disclosure of a Record that has been requested is compulsory if it would reveal a substantial contravention of, or failure to comply with the law, or imminent and serious public safety or environmental risk and the public interest in the disclosure of the Record clearly outweighs the harm contemplated by its disclosure.
- 10.3 If the Requestor's interest does affect a third party then the Company will first need to inform the third party within 21 days of receiving the request. The third party has

21 days to make representations and/or submissions regarding the granting of access to the Record.

10.4 Requests for information that are clearly frivolous or vexatious, or which involve unreasonable diversion of resources shall be refused.

10.5 All requests for information will be assessed on their own merits and in accordance with the applicable laws.

11 The Information Officer's decision and requestor's recourse

11.1 Once the Information Officer has heard all the submissions, he or she will decide as to whether or not access to the Record will be granted. If access is granted the Requestor must then be granted access to the Record within 30 days of being informed of the decision.

11.2 If the request for access is successful, an access fee may be required for the search, reproduction and/or preparation of the Record(s) and will be calculated based on the prescribed fees as specified in Annexure B hereto. The access fee must be paid prior to access being given to the requested Record(s).

11.3 If the Information Officer does not grant the Requestor access to the Record the Requestor is entitled in accordance with sections 56(3) (c) and 78 of PAIA to apply to a court for relief within 180 days of notification of the decision for appropriate relief, such as an order compelling the Record or Records requested to be made available to the Requestor or for another appropriate order. The court will determine whether the records should be made available or not.

11.4 The Requestor may also approach the Information Regulator and lodge a complaint in accordance with section 74 of POPIA in the prescribed form against the access fee to be paid or the form of access granted. The details of the Information Regulator are as follows:

The Information Regulator (South Africa)
Woodmead North Office Park,
54 Maxwell Drive, Woodmead,
Johannesburg, 2191

email: www.inforegulator.org.za

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

11.6 The Requestor is entitled to receive proper reasons as to why the request was refused.

11.7 If the Information Officer does decide to grant access to the Record, the third party that has been affected has 30 days in which to appeal the decision in the High Court or to lodge a complaint with the Information Regulator in accordance with section 74 of POPIA in the prescribed form. If no appeal or complaint is lodged within 30 days, the Requestor must be granted access to the Record.

12 Information or Records not Found

12.1 If a requested record cannot be found or if the records do not exist, the Information Officer shall, by way of an affidavit or an affirmation, notify the Requestor that it is not possible to give access to the requested record.

- 12.2 The affidavit or affirmation shall provide an account of all reasonable steps taken to find the record or to determine its existence.
- 12.3 This notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of PAIA.
- 12.4 If the record should later be found the Requestor shall be given access to record in the manner stipulated by the Requestor in the prescribed form unless access is refused by the Information Officer.
- 12.5 The attention of the Requestor is drawn to the provisions of Chapter 4 of PAIA in terms of which the Company may refuse, on certain specified grounds, to provide information to a Requestor.

13 **POPIA**

13.1 **Purpose of the Processing of Personal Information by the Company**

The purposes for which the Company Processes or will Process Personal Information are:

- (a) to collect information when a Data Subject approaches the Company for legal advice and services;
- (b) engaging in commercial transactions with clients, vendors and other business contacts;
- (c) to respond to requests for legal services and advice and to provide legal services;
- (d) to perform a contract or for contract negotiation;
- (e) to contact the Data Subject with information that might be of interest, including legislative updates;
- (f) for the performance of marketing activities;
- (g) in order to comply with laws, regulations, court orders, judgements and other legal obligations;
- (h) as may be necessary for pursuing the Company's legitimate interests or that of a third party to whom the Personal Information is disclosed;
- (i) to manage the Company's relationship with its clients and Employees and to facilitate any necessary follow up;
- (j) to enforce the Company's Privacy Notices and other rules about the use of the Company website;
- (k) to protect the Company's rights or property;
- (l) as necessary to protect someone's health, safety or welfare; and
- (m) in other ways to which the Data Subjects' consent.

13.2 **Categories of Data Subjects**

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. The categories of Data Subjects in relation to which the Company Processes Personal Information include, but are not limited to:

- (a) the Company's Employees;
- (b) Clients and Client's subsidiary/holding/affiliate companies or persons;
- (c) the Company's suppliers, vendors and contractors;
- (d) the Company's subsidiary/holding/affiliate companies; and
- (e) third parties involved in any litigation, dispute, or transaction with or against Clients.

13.3 Recipients or categories of recipients of Personal Information

The recipients to whom the Company may provide a Data Subject's Personal Information include, but are not limited to:

- (a) vendors, suppliers, service providers;
- (b) regulatory authorities, governmental bodies or agencies, other bodies involved in the judicial functions;
- (c) other professional advisors;
- (d) third-party applications or platforms providers; and/ or
- (e) companies within the Clyde & Co LLP's group of companies and their respective representatives.

13.4 Cross-border flows of Personal Information

13.4.1 The Company may disclose and transfer Personal Information to third parties located in a country which do not offer a level of protection for the information as required under POPIA. In such instances, the Company shall ensure an applicable ground for transfer in accordance with the requirements of section 72 of POPIA.

13.4.2 The Company will enter into an intra-group data transfer agreement which will ensure that Personal Information shared with other Company entities uphold similar provisions as required under POPIA for the protection of the Personal Information which is transferred from South Africa.

13.5 Description of information security measures to be implemented by the Company

The Company undertakes to institute and maintain data protection measures to accomplish the objectives contained in POPIA. 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 different otherwise suitable measures and adapt to technological security development, as needed, provided that the level of data protection achieved for each objective meets the requirements of POPIA. The following is a list of the types of security measures implemented by the Company in order to ensure that Personal Information is protected from loss of, damage to or unauthorized destruction of or unlawful access to Personal Information:

- (a) Access control to the office and restriction of access to hard copies of documents containing Personal Information;
- (b) Access will be regulated by identity codes and keywords;
- (c) The Company has a password system that consists of a minimum of 12-characters and must be changed every 120 days;

- (d) Anti-virus systems are used and updated frequently in terms of existing global information security policies;
- (e) Anti-intrusion systems (i.e. firewall) are used and updated frequently in terms of existing global information security policies;
- (f) Agreements shall be entered into with service providers and operators in terms of which such service providers and operators have contractually agreed to implement and maintain appropriate security measures;
- (g) The Company has implemented suitable measures to prevent its data processing systems from being used by unauthorized persons.

14 **Objection to the Processing of Personal Information by a Data Subject**

14.1 Section 11(3) of POPIA and Regulation 2 of the POPIA Regulations provides that a Data Subject may object to Processing in the prescribed form attached as Annexure "C" to this Manual where the Processing is based on one of the following grounds, unless legislation provides an exemption for such Processing:

- (a) PROCESSING protects a legitimate interest of the Data Subject;
- (b) Processing is necessary for the proper performance of a public law duty by a public body;
- (c) Processing is necessary for pursuing the legitimate interests of the Responsible Party or of a third party to whom it is supplied;
- (d) Processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications as referred to in section 69 of POPIA.

15 **Request for correction or deletion of Personal Information**

Section 24 of POPIA and Regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as Annexure D to this Manual.

Last Reviewed: 01/09/2025

Next Review Date: 01/09/2026

Annexure A

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	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf			

request is made (if applicable)			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact numbers	Tel. (B):		Facsimile:
	Cellular:		
PARTICULARS OF RECORD REQUESTED <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 on record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
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	
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:	
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FEES	
a)	A request fee must be paid before the request will be considered.
b)	You will be notified of the amount of the access fee to be paid.
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 (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requestor / 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 (<i>if any</i>)	

Signature of Information Officer

Annexure B

- 1 The fee for a copy of the manual as contemplated in regulations 9 (2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.
- 2 The fees for reproduction referred to in regulation 11(a) are as follows:
 - (a) for every photocopy of an A4-size or part thereof R 1,10;
 - (b) for every printed copy of an A4-size or part thereof held on a computer or in electronic R 0,75 or machine-readable form;
 - (c) for a copy in a computer-readable form on:
 - (i) stiffy disc - R 7,50;
 - (ii) compact disc - R 70,00;
 - (d) for a transcription of visual images, for an A4-size page or part thereof R 40,00, for a copy of the visual images R 60,00;
 - (e) for a transcription of an audio Record, for an A4-size page or part thereof R 20,00, for a copy of an audio Record R 30,00.
- 3 The request fee payable by a Requestor, other than a Data Subject, referred to regulation 11(2) is R 50,00.
- 4 The access fees payable by a Requestor referred to in regulation 11(3) are as follows:
 - (a) for every photocopy of an A4-size or part thereof R 1,10;
 - (b) for every printed copy of an A4-size or part thereof held on a computer or in electronic or machine-readable form R 0,75;
 - (c) for a copy in a computer-readable form on:
 - (i) stiff disc R 7,50;
 - (ii) compact disc R 70,00
 - (d) for a transcription of visual images, for an A4-size page or part thereof R 40,00, for a copy of an audio Record R 30,00;
 - (e) to search for and prepare the Record for disclosure, R 30,00 for each hour or part of an hour reasonably required for such search and preparation;
 - (f) for purposes of section 54(2) of the Act, the following applies; and
 - (i) six hours as the hours to be exceeded before a deposit is payable; and
 - (ii) one third of the access fee is payable as a deposit by the Requestor;
 - (g) the actual postage is payable when a copy of a Record must be posted to a Requestor.

Annexure C

FORM FOR THE OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

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 the 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 (<i>if the Responsible Party is a natural</i>):		
Residential, postal or business address:		
Code ()		
Contact number(s);		

Annexure D

FORM FOR THE REQUEST TO DELETE OR CORRECT PERSONAL INFORMATION IN TERMS OF POPIA

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR destruction 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:

Reference Number....

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 security the Record of information.

A	DETAILS OF DATA SUBJECT
Surname	
Full names:	
Identity number:	
Residential, postal or business address	
Code ()	
Contact number(s):	
Fax number:	
E-mail address:	

