

# 2024

## PAIA & POPIA

### MANUAL



**LEADER RUBBER COMPANY**

SOUTH AFRICA (PTY) LTD

This manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act no. 2 of 2000) ("the Act") and to address the requirements of the Protection of Personal Information Act, 2013 (Act no. 4 of 2013).

This manual applies to Leader Rubber Company (Pty) Ltd  
Registration Number: 1935/006496/07  
(the "Company")

Registered office address:  
8 Kelvin Street  
Industria, Johannesburg  
2001  
South Africa

The Act grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. The purpose of this document is to serve as the Manual of Leader Rubber Company (Pty) Ltd as required in terms of the Act, and to provide a reference as to the records held and the procedures that need to be followed to request access to such records.

A copy of the manual is available for inspection at the office of Leader Rubber Company (Pty) Ltd and is available on the company website at [www.leadertread.co.za](http://www.leadertread.co.za).



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TREAD**  
leading the way<sup>®</sup>

**MILEMASTER**

  
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## 2. INTRODUCTION

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The Promotion of Access to Information Act, 2000 (the “PAIA Act”) gives effect to the provisions of Section 32 of the Constitution of the Republic of South Africa, 1996 (the “Constitution”), which provides for the right of access to information. The PAIA Act gives third parties the right to approach public and private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the public or private body or government is obliged to release such information unless the PAIA Act expressly states that the records containing such information may or must not be released.

The Protection to Personal Information Act, 4 of 2014 (the “POPI Act”) gives effect to the provisions of Section 14 of the Constitution provides that everyone has the right to privacy. The right to privacy includes a right to protection against the unlawful collection, retention, dissemination and use of personal information. A responsible party who processes personal information must notify the person to whom personal information relates (“Data Subject”) of the manner in which the Data Subject can access their personal information held by the Responsible Party.

## 3. PURPOSE

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The purpose of this Manual informs requestors of procedural and other requirements which a request must meet as prescribed by PAIA. The POPI Act gives Data Subjects the right to request a Responsible Party 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 Responsible Party is no longer authorised to retain access and/or request the correction or deletion of any Personal Information held about them that may be inaccurate, misleading or outdated.

Leader Rubber Company (Pty) Ltd (“the Company”) believes that this Manual will assist requestors in exercising their rights. The Acts seek, inter alia, to give effect to the constitutional right of access to any information held by the state or by any other person where such information is required for the exercise or protection of any right, as well as the right to privacy and protection of Personal Information. This PAIA Manual was compiled in terms of Section 51 of the PAIA Act and Sections 23-25 of the POPI Act to facilitate access to records held by the Company. It contains information required by a person wishing to exercise any right, contemplated by PAIA or POPIA.

A copy of this Manual is available in English to the public in a PDF (“Portable Document Format”) version on the Company website ([www.leadertread.co.za](http://www.leadertread.co.za)) or on request from the Information Officer referred to in this Manual.

For the purpose of POPIA and PAIA, the Company is defined as a private body.

## 4. BACKGROUND TO LEADER RUBBER COMPANY (PTY) LTD

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For over 60 years, Leader Rubber Company has supplied and manufactured precure tread and consumables required for the retreading process. We also assist the end-user with a range of tyre management tools.

Our foundation is based on honesty, integrity, and our world-class operations that apply best practices. We continuously strive to use innovative methods by making use of advanced technologies. Our customers always receive consistent quality, competitive prices, and value-added services.

# 5 REQUIRED COMPANY INFORMATION

Name of body	Leader Rubber Company (Pty) Ltd
Registration Number	1935/006496/07
Information Officer	Brett Sproson
Deputy Information Officer(s)	Adel Ribeiro
Email address	a.ribeiro@leadertread.co.za
Physical address	8 Kelvin Street, Industria, Johannesburg, 2001
Postal address	8 Kelvin Street, Industria, Johannesburg, 2001
Telephone Number	+27 (0) 11 473 8200
Website	www.leadertread.co.za

# 6 DESCRIPTION OF GUIDE REFERRED TO IN PAIA

The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages and in braille, and can be obtained upon request to the Information Officer, from the website of the Regulator, or by contacting the Information Regulator using any of the following means:

The Information Regulator (South Africa)  
 JD House 27 Stiemens Street, Braamfontein, Johannesburg, 2001,  
 P.O. Box 31533, Braamfontein, Johannesburg, 2017

General enquiries:	<a href="mailto:enquiries@inforegulator.org.za">enquiries@inforegulator.org.za</a>
Complaints:	<a href="mailto:PAIAComplaints@inforegulator.org.za">PAIAComplaints@inforegulator.org.za</a>
Website:	<a href="http://www.inforegulator.org.za">www.inforegulator.org.za</a>

# 7. NOTICE OF RECORDS AVAILABLE WITHOUT REQUEST

SECTION 52(2)

The following records are available on the Company Website and available for download without a requestor having to request access to the records.

Category of record	Types of Record	Available on Website	Available upon request
PAIA	PAIA Manual	✓	✓
POPIA	Privacy Statement	✓	✓
Products / Services	Product/Service Catalogue(s)	✓	✓

# 8. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

SECTION 51(1)(D)

A description of the subjects on which the company holds records and the categories of the records held can be found in “Annexure B” of this manual, which forms an integral part of this manual. Records are kept in accordance with such other legislation as applicable to the Company, which includes, but is not limited to:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Constitution of the Republic of South Africa Act 108 of 1996
- Copyright Act 98 of 1978
- Credit Agreement Act 75 of 1980
- Criminal Procedure Act 51 of 1977
- Customs and Excise Act No. 91 of 1964
- Debt Collectors Act 114 of 1998
- Employment Equity Act 55 of 1998
- Electronic Communication and Transactions Act, No. 25 of 2002
- Income Tax Act 58 of 1962
- Insolvency Act No 24 of 1936
- Intellectual Property Laws Amendment Act No.38 of 1997
- Occupational Health and Safety Act 85 of 1993
- Labour Relations Act 66 of 1995
- Machinery and Occupational Safety Amendment Act No. 181 of 1993
- Patents, Designs and Copyright Merchandise Marks Act, No. 17 of 1941
- Pension Funds Act, 1956
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Road Transportation Act No. 74 of 197
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Transfer Duty Act No. 40 of 1949
- Trademark Act No. 194 of 1993
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991



Such records will be made available to only those individuals/entities authorised to request access to such records in terms of the particular legislation. Any other persons must follow the request for access of records procedure as outlined in this Manual, however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and other applicable legislation.

While the Company has used its best endeavours to supply you with a list of applicable legislation, 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 PAIA or POPI Acts, we shall update the list accordingly.

## **9. RECORDS THAT ARE NOT AUTOMATICALLY AVAILABLE**

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Records of the Company which are not automatically available must be requested in terms of the procedure set out in this manual, and the Regulations as set out in terms of PAIA and POPIA, and which may be subject to the restrictions and right of refusal to access as prescribed.

No request shall be accepted telephonically, nor shall any information be supplied telephonically. Only the Information Officer or any Deputy Information Officer appointed shall have the mandate to disclose information in terms of this Manual.

## **10. REQUEST TO ACCESS RECORD PROCEDURE**

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Please be aware that the Company is concerned about protecting the private and/or confidential information of its Data Subjects. Please motivate any request for Personal Information very carefully, having regard to POPIA and the right that the requestor may rely upon. A request will not automatically be granted and short reasons for the refusal shall be supplied.

All requests to the Company will be evaluated and considered in accordance with the Acts. Publication of this Manual and describing the categories and subject matter of information held by Leader Rubber Company (Pty) Ltd does not give rise to any rights to access such information or records, except in terms of the Acts.

10.1. An individual who wishes to place a request must comply with all the procedures laid down in PAIA.

10.2. Any person making a request for access to records of the Company is referred to as a "requestor".

10.3. If a requestor has requested the records on another individual's behalf, the requestor must submit proof of the capacity the requestor submits the request in, to the satisfaction of the Information Officer.

10.4. The requestor can obtain the latest PAIA and POPIA forms from the Information Regulator's website: <https://inforegulator.org.za/>, use the "Annexure of Forms" with hyperlinks at the end of this Manual, or request a copy of the form from the Company's Information Officer.

For the convenience of requestors, copies of these forms are included on the website.

10.5. The requestor must complete the prescribed application form "PAIA Form 2" and submit the form as well as payment of the request fee and a deposit, if applicable, to the Information Officer of the Company at the postal or physical or electronic mail address as stated in section 4 of this Manual. The prescribed form must be filled in with sufficient particulars to at least enable the Information Officer of the Company to identify:

- (a) record or records requested;
- (b) identity of the requestor;
- (c) which form of access is required, if the request is granted; and
- (d) postal address, telephone number and fax number of the requestor.

10.6. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of our Information Officer.

10.7. The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required and indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

10.8. The requestor must state that he/she requires the information to exercise or protect her/his right and clearly state what the nature of the right is to be exercised or protected. In addition, the requestor must clearly specify why the records are necessary to exercise or protect such a right.

10.9. Such request must be processed within 30 (thirty) days after the request has been received, unless the requestor has set out special grounds that satisfies the Information Officer that the request be dealt with sooner.

10.10. The requestor shall be informed whether the access has been granted or denied within 30 (thirty) days of receipt of the request and give notice with reasons to that effect. The outcome of the request will be provided as per "PAIA Form 3" by the information Officer.

10.11. The 30 (thirty) day period within which the Company has to decide whether to grant or refuse the request, may be extended for a further period of not more than 30 (thirty) days if the request is for a vast amount of information, or the information cannot reasonably be obtained within the original 30 (thirty) day period. The Information Officer will notify the requestor in writing should an extension be necessary.

10.12. The requestor will be informed in writing whether access to the records have been granted or denied. If the requestor requires a reason for the decision the request must be expressed in the prescribed form, the requestor must be further stated what particulars of the reasoning the requestor requires.

10.13. If the request for access is granted, the Information Officer of the Company must advise the requestor:

- (a) the access fee (if any) to be paid upon access;
- (b) the form in which access will be given; and
- (c) that the requestor may lodge an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging the application.

10.14. If the request for access is refused, the Information Officer of the Company will:

- (a) state adequate reasons for the refusal, including the provisions of this Act relied on;
- (b) exclude, from any such reasons, any reference to the content of the record; and
- (c) state that the requestor may lodge an application with a court against the refusal of the request, and the procedure (including the period) for lodging the application.

10.15. In terms of Section 54 of the PAIA Act, if all reasonable steps have been taken to find the record requested and there are reasonable grounds to believe that the record is in possession of the Company but cannot be found, and if it does not exist, then the Information Officer of the Company will notify by way of affidavit or affirmation, the requestor that it is not possible to give access to that record.

10.16. If after notice is given, the record in question is found, the requestor must be given access thereto unless the ground for the refusal of access exists.

10.17. If the request is declined for any reason the notice must include adequate reasons for the decision, together with the relevant provisions of the PAIA Act relied upon and provide the procedure to be followed should the requestor wish appeal the decision.

10.18. Section 59 provides that the Information Officer of the Company may serve a record and grant access only to that portion which the law does not prohibit access to.

10.19. The requestor must pay the prescribed fee before any further processing can take place.

10.20. Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the Information Officer for assistance.

10.21. An oral request can be made to the Information Officer should the requestor be unable to complete the form due to illiteracy or a disability. The Information Officer will complete the form on behalf of the requestor and provide a copy of the form to the requestor.

# 11. CONFIDENTIALITY OF THIRD-PARTY INFORMATION

The Company will protect the confidentiality of information provided to it by third parties, subject to the Company's obligations to disclose information where we have a duty or a right to disclose in terms of law or industry codes, or where we believe it is necessary to protect our rights. If access is requested to a record that contains information about a third party, the Company is obliged to attempt to contact such third party to inform him/her/it of the request.

The Information Officer of the Company must take all reasonable steps to inform the third party of the request. This will be done within 21 (twenty-one) days of receipt of the request.

The Company will give the third party an opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. If the third-party furnishes reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted to the requestor or not.

The third party must be advised of the decision taken by the Information Officer of the Company whether to grant or to decline the request. A third party who is dissatisfied with the Information Officer of the Company's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

# 12. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

*SECTION 62-70 OF PAIA*

The Company has the right to refuse access to information on legal grounds as set out in POPI Act and in PAIA Act, chapter 4 section 62 – 70 and the outcome recorded on "PAIA Form 3".

The following are grounds upon which the Company may, subject to the exceptions in Chapter 4 of PAIA, refuse a request for access in accordance with Chapter 4 of PAIA.

- 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:
  - o Trade secrets of that third party;
  - o 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
  - o 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:
  - o Trade secrets;
  - o Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Company;
  - o 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
  - o 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.
- Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.



# 13. APPEAL - REMEDIES

SECTION 57(1)

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

The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 days of notification of the decision for appropriate relief.

# 14. REQUEST FOR ACCESS TO RECORD FEES

14.1. PAIA provides for two types of fees, namely:

- (a) A request fee, which will be a standard fee; and
- (b) An access fee, which must be calculated by considering reproduction costs, search and preparation time and costs, as well as postal costs.

14.2. When the request is received by the Information Officer of the Company, such person shall by notice require the requestor to pay the prescribed request fee, if any, using "PAIA Form 3", before further processing of the request.

14.3. If a requestor requires access to records of his/her Personal Information, there shall be no request fee payable. However, the requestor must pay the prescribed access and reproduction fees for such Personal Information.

14.4. If the search for the record has been made and the preparation of the record for disclosure including arrangements to make it available in the request form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer of the Company shall notify the requestor to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

14.5. The Information Officer of the Company shall withhold the record until the requestor has paid the fees as indicated in "PAIA Form 3". For more information on the current Prescribed Fee structure, please refer to "Annexure B" of this Manual.

14.6. A requestor whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the records for disclosure including making arrangements to make it available in the request form.

14.7. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer of the Company must repay the deposit to the requestor with interest at the prescribed rate.

# 15. NO REQUIRED FEES

The following requests are not subject to fees, prescribed or otherwise:

- 14.8. Objection to the Processing of Personal Information;
- 14.9. Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information; and
- 14.10. Complaint Regarding Interference with the Protection of Personal Information.

# 16. PROCESSING OF PERSONAL INFORMATION

The Company collects and uses Personal Information of the individuals and corporate entities with whom it works to operate and carry out its business effectively, and this may include but is not limited to, personal information of employees, contractors, vendors, suppliers, and service providers.

The Company processes information for the following purposes:

- To fulfil agreements in relation to its employees.
- To provide services to its Clients in accordance with terms agreed to by the Clients.
- To undertake activities related to the provision of services, such as:
  - o To fulfil domestic legal, regulatory and compliance requirements.
  - o To verify the identity of Customer representatives who contact the Company or may be contacted by The Company.
  - o For risk assessment, information security management, statistical, trend analysis and planning purposes.
  - o To monitor and record calls and electronic communications with the Client for quality, training, investigation and fraud prevention purposes.
  - o To enforce or defend the Company or the Company affiliates' rights.
  - o To manage the Company's relationship with its clients, which may include providing information to its clients and its clients affiliates about the Company's and the Company affiliates' products and services.
- The purposes related to any authorised disclosure made in terms of agreement, law or regulation.
- Any additional purposes expressly authorised by the Company's client.
- Any additional purposes as may be notified to the Client or Data Subjects in any notice provided by the Company.

Data Subjects may also refer to the Company's Privacy Notice for more information about how the Company processes Personal Information, for what purpose(s) does processing take place, the categories of third parties the Company may disclose personal information to, as well as any planned trans-border flows of personal information.

The Company may use or process any goods or services information, or optional information that you provide to the Company for the purposes that you indicated when you agreed to provide it. Processing includes gathering Personal Information, disclosing it, and combining it with other personal information.

The Company processes Personal Information of the following categories of Data Subjects:

Categories of Data Subjects	Personal Information that may be processed
<b>Juristic Persons</b>	
Corporate Clients	Name, address information, registration numbers or identity numbers, contact numbers, director's information, bank details, VAT numbers
Suppliers	Company name, representative name(s) and contact information, registration number, VAT number, address information, payment information and bank account details
<b>Natural Persons</b>	
Employees or job applicants	Name, address information, contact information, qualifications, gender and race, curriculum vitae information, identity numbers or passport numbers, bank account details
Client representatives	Name, company name, contact information
Supplier representatives	Name, company name, contact information
Visitors	Name, vehicle license number, company name, contact information, CCTV footage

The Company's Privacy Notice is available from [www.leadertread.co.za](http://www.leadertread.co.za) and incorporated by reference herein. A copy of the Privacy Notice can also be requested from the Information Officer using the contact details provided in this Manual.

#### 16.1 RECIPIENTS OF PERSONAL INFORMATION

Recipients of Personal Information includes the Company, the Company's affiliates, their respective representatives.

#### 16.2 Cross-Border Transfers of Personal Information

The Company may share personal information with third parties and in certain instances this may result in cross border flow of the personal information.

When making authorised disclosures or transfers of personal information in terms of Section 72 of POPI, personal information may be disclosed to recipients in countries that do not have the same level of protection for personal information as South Africa does.

The personal information will always be subject to Leader Rubber Company Pty Ltd protection, not less than the protection it is afforded under the Protection of Personal Information Act No.4 of 2013

#### 16.3 General Description of Information Security Measures

The Company has implemented numerous security measures, including good governance processes and procedures and implementing an Information Security Management System (ISMS) aligned to ISO/IEC 27001:2022 and its related ISO/IEC 27002:2022 guidelines, and ensures that appropriate security measures are taken and updated on a regular basis.

**Such control measures include, but are not limited to:**

- Information Security policies
- Access Controls
- Privileged Access Management
- Network Access Controls and Security
- Endpoint Protection
- Device and File-level Encryption
- Information Identification, Classification and Handling
- Mobile Device Management
- Secure Remote Access
- Incident Management Procedures
- Data Breach Reporting and Notification
- Backup and Disaster Recovery Policy and Plan
- IT Capacity Management
- Change Control Procedures
- Clear Desk and Clear Screen
- As well as numerous other information and cyber-security measures.

The Company has also implemented robust data privacy procedures including, but not limited to, handling of Data Subject requests, POPIA complaints, data breaches and related notifications, managing Operator security and agreements, and transborder information flow, among others.

The Company continuously implements and monitors technical and organisational security measures (TOMs) to protect the Personal Information it holds against unauthorised access, as well as accidental or wilful manipulation, loss or destruction. Where physical records of the data exist, such records will be stored in a secure area that can be 'locked-away' as to avoid a breach of the personal information. Such physical data records will be 'locked-away' and secured when not in use, in accordance with our Clear Desk and Clear Screen Policy.

#### 16.4 Data Subject Participation

Data Subject Right	Description of Right
Request whether the responsible party holds any information of the data subject	Section 23(1)(a) of POPIA provides that a data subject may, at any time and free of charge, request the Company to confirm whether or not it holds or processes personal information about the data subject
Request access to Personal Information of a Data Subject	Section 23(1)(b) of POPIA provides that a data subject may, at any time, request the record or a description of the personal information about the data subject, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information. Such request can be made by following the request procedure as outlined in this Manual. Such request can be made by following the request procedure as outlined in this Manual.
Withdrawal of consent	Section 11(2)(b) of POPIA provides that a data subject may, at any time, withdraw consent if previously provided for a given purpose, as long as such withdrawal does not affect any other lawful basis for processing information, and may do so by following the unsubscribe links on all marketing material and/or express their wish to withdraw their consent for any other purpose by e-mailing the Information Officer.
Objection to the processing of personal information	Section 11(3) of POPIA and regulation 2 of the POPI regulations provides that a data subject may, at any time object to the processing of their personal information in the prescribed form attached to this manual as annexure "B"
Request for correction or deletion of personal information:	Section 24 of POPI and regulation 3 of the POPI regulations provides that a data subject may request for their personal information to be corrected and/or deleted in the prescribed form attached hereto as ANNEXURE "C".



# 17. COMPLAINTS

We kindly request that any complaints regarding a PAIA or POPIA request first be addressed to the Company's Information Officer at the contact details provided in section 4 of this Manual, however, as a requestor you have a right to complain about the outcome of your request.

A complaint contemplated in terms of section 77 of the PAIA Act may be lodged in writing to the Information Regulator on "PAIA Form 5", and a complaint contemplated in terms of section 74 of the POPI Act may be lodged in writing to the Information Regulator on "POPIA Form 5".

The Information Regulator's contact information for submitting the aforementioned compliant forms is provided in section 5 of this Manual.

# 18. UPDATING OF THE MANUAL

The Information Officer of the Company will regularly review and update this Manual. You can find the date of last update on the cover page of this Manual.

Annexure of Forms	
Annexure A	Fees in respect of private bodies
Annexure B	Subjects and categories of records held by the Company
<b>PAIA Forms</b> <a href="https://infoeregulator.org.za/paia-forms/">https://infoeregulator.org.za/paia-forms/</a>	
Form 1	<a href="#">Request for a Copy of the Guide from an Information Officer [Regulations 3]</a>
Form 2	<a href="#">Request for Access to Record [Regulation 7]</a>
Form 3	<a href="#">Outcome of request and of fees payable [Regulation 8]</a>
Form 5	<a href="#">Complaint Form [Regulation 10]</a>
<b>POPIA Forms</b> <a href="https://infoeregulator.org.za/popia-forms/">https://infoeregulator.org.za/popia-forms/</a>	
Form 1	<a href="#">Objection to the Processing of Personal Information</a>
Form 2	<a href="#">Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information</a>
Form 5	<a href="#">Complaint Regarding Interference with the Protection of Personal Information/ Complaint Regarding Determination of an Adjudicator</a>

# **ANNEXURE A:**

## **SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE COMPANY**

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Please note that many of the records held by us are those of third parties, such as clients and employees, and we take the protection of third-party confidential information very seriously. Many of the records held are confidential and others are the property of the client and not of the Company. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

Refer -to section 10 of our Manual.

We maintain records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act. In particular, there may be applicable grounds of refusal of such a request, as set out in the Act.

Refer to sections 11 of our Manual.

### **Company Secretarial Records**

- Memoranda and Articles of Association/ Incorporation
- Secretarial records
- Tradename registrations
- Trademark registrations
- Company registration documents
- Register of Directors
- Share certificates
- Other Statutory records.
- Internal policies and procedures- where applicable.
- Minutes of meeting- where applicable.
- Records held by officials of “the company”

### **Financial Records**

- Accounting records
- Annual reports
- Interim reports
- Auditor details and reports
- Tax returns
- Insurance records

### **Legal Records**

- Agreements with clients
- Agreements with suppliers
- Shareholder agreements
- Partnership agreements
- Licenses and permits
- Power of Attorneys
- Sale agreements
- Lease agreements

### **Personnel Records**

- Employee contracts
- Employee benefits
- Personnel records and correspondence
- Any records a third party has provided to us about any of their personnel
- Training records
- Employment policies and procedures
- Internal evaluation and disciplinary records
- Information pertaining to share options, share incentives, bonus or profit-sharing agreements of each employee
- Pension and provident fund records

**Client-related Records**

- Client database
- Credit applications
- Correspondence with clients
- Documentation prepared for clients
- Invoices, receipts, credit and debit notes

**Miscellaneous**

- Published marketing material
- Internal correspondence
- Information Technology records
- Trade Secrets
- Domain name registrations
- Website information
- Asset registers
- Title deeds



# ANNEXURE B:

## FEES IN RESPECT OF PRIVATE BODIES

The following fees are prescribed by Annexure B of the PAIA Regulations (GG 45057, GoN 757, 27 Aug 2021), and payable on reproduction of a record if the request is granted as contemplated in Regulation 4, 5, or 7.

If the search exceeds 6 hours, a 33% deposit is payable and access to records may be withheld until the deposit is paid by the requester.

The request fee payable by every request	R140.00
For every B&W photocopy of an A4-size page	R2.00 per page or part thereof
For every printed copy of an A4-size page held on a computer or in electronic or machine-readable form	R2.00 per page or part thereof
For a copy in a computer-readable form on-	
Compact disc	R 40.00 (if provided by requestor) R 60.00 (if provided by company)
USB thumb drive	R 40.00 (to be provided by requestor)
For a transcription of visual images per A4-size page	Actual costs (service to be outsourced. Will depend on quotation from the transcription service provider)
Copy of visual images	
Transcription of an audio records, per A4-size page	R24.00
Copy of an audio record	
Compact disc	R 40.00 (if provided by requestor) R 60.00 (if provided by company)
USB thumb drive	R 40.00 (to be provided by requestor)
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.	R145.00 (to not exceed a total cost of R435.00)
Deposit: (If search exceeds 6 hours)	1/3 of the amount per request calculated in terms of the above.
Postage, e-mail or any other electronic transfer:	Actual costs, if any

Requesters who are also Data Subjects may request whether the Company holds any of their Personal Information free of charge and without needing to submit a formal request in terms of PAIA.