



Uthingo Partners (Pty) Ltd

Section 51 Manual

Promotion of Access to Information Act

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1. Introduction

Overview

This manual has been prepared in terms of the section 51 of the Promotion of Access to Information Act 2 of 2000 and to address the requirements of the Protection of Personal Information Act 4 of 2013.

Scope

This manual is to assist potential requesters, who intend to obtain documents or records from the company in terms of the Act, by providing the processes to be followed in initiating such requests.

2. Definitions

Client	any natural or juristic person that received or receives services from the Company
Conditions for Lawful Processing	the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA and in paragraph 12 of this Manual
Data Subject	the person to whom personal information relates
Information Officer	the individual who is identified in paragraph 3 of this manual
Manual	This manual
PAIA	The Promotion of Access to information Act 2 of 2000
Personal Information	means information relating to an identifiable, living, natural person, and where it is applicable, an

identifiable, existing juristic person, including, but not limited to—

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

Personnel

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 nonexecutive), all permanent, temporary and parttime staff as well as contract workers

POPIA

the Protection of Personal Information Act 4 of 2013

POPIA Regulations

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

Private Body

means—

- a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;

	<ul style="list-style-type: none"> b) a partnership which carries or has carried on any trade, business or profession; or c) any former or existing juristic person, but excludes a public body
Processing	<p>means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including–</p> <ul style="list-style-type: none"> a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; b) dissemination by means of transmission, distribution or making available in any other form; or c) merging, linking, as well as restriction, degradation, erasure or destruction of information
SAHRC	The South African Human Rights Commission

Any other terms not described herein will have the meaning as ascribed to them in terms of PAIA or POPIA.

3. Contact Details

In terms of Protection of Personal Information Act, 2013 and Promotion of Access to Information Act, 2000, every private body must appoint an Information Officer responsible for ensuring compliance with the Acts.

The Information Officer is responsible for:

- Ensuring compliance with POPIA and PAIA
- Handling requests for access to information
- Managing complaints relating to personal information
- Overseeing data protection practices within the Company

Information Officer Details

Business Name	Uthingo Partners (Pty) Ltd
Registration Number	2025/338791/07
Registered Office	8 Eshowe Street, Paulshof Ext 10, Sandton, Gauteng, 2191
Office Address	Homestead Office Park, Block C, 65 Homestead Avenue, Bryanston, Gauteng, 2021

Postal Address	Homestead Office Park, Block C, 65 Homestead Avenue, Bryanston, Gauteng, 2021
Contact Number	011 568 8166
Information Officer	Nontombi Selepe
Deputy Information Officer	Lauren O’Dwyer
Email address	lauren@uthingopartners.co.za

Background information of the Company can be found at <https://www.uthingopartners.co.za>

Requests for access to information and queries relating to personal information may be directed to the Information Officer or Deputy Information Officer

The Company’s principal place of business, listed above, is the location where the Company conducts its operations and where records may be accessed in terms of this manual. The registered address of the Company is recorded with the Companies and Intellectual Property Commission (CIPC) for statutory purposes.

4. Guide of SAHRC

- A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.
- The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.
- Should you wish to access the guide you may request a copy from the Information Officer by submitting ANNEXURE “A”, attached hereto, to the details specified above.
- You may also inspect the guide at the Company’s offices during ordinary working hours.
- You may also request a copy of the guide from Information Regulator at the following details:

Information Regulator:

Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Website	https://www.justice.gov.za
Email	PAIACompliance.IR@justice.gov.za

Role of the Information Regulator

The Information Regulator is the supervisory authority responsible for monitoring and enforcing compliance with POPIA and PAIA in South Africa.

Data subjects who believe their rights have been infringed may lodge a complaint with the Information Regulator.

5. Latest Notices in Terms of Section 52(2) of PAIA

At this stage no Notice(s) has / have been published on the categories of records that are available without having to request access to them in terms of PAIA.

5A. Categories of Records Automatically Available

The following categories of records may be available without the need to submit a formal request in terms of PAIA, subject to availability and applicable restrictions:

- Information available on the Company website
- Marketing and promotional material
- Published company profiles and brochures
- General information relating to the services provided by the Company
- Publicly available policies and procedures
- Information published for public awareness or regulatory purposes

Access to these records may be requested directly from the Company without following the formal PAIA request procedure.

6. Availability of Certain Records in Terms of PAIA

The Company holds and/or processes the following records for the purposes of PAIA and POPIA.

The following records may be requested; 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 any other applicable legislation.

Products and/or Services:

All products and/or services are available freely on the Company's website as set out above.

Human Resources:

- Employment Contracts
- Identity documents and personal information
- Payroll records
- Performance reviews
- Leave records

- Disciplinary records
- Employee benefits
- Personnel records and correspondence
- Training records
- Recruitment records
- Medical certificates
- UIF documentation
- Tax (IRP5 / EMP201 / EMP501) records
- Internal policies
- Information pertaining to share options, share incentives, bonus or profit-sharing agreements of each employee
- Pension and provident fund records

Legal and Compliance:

- Agreements with Clients and Suppliers
- Non-disclosure agreements (NDAs)
- Data processing agreements
- Data sharing agreements
- POPIA compliance documentation
- PAIA manual
- Risk assessments
- Insurance Policies
- Litigation records
- Legal opinions
- Compliance registers
- Shareholder agreements
- Partnership agreements
- Licenses and Permits
- Power of Attorneys
- Sale agreements
- Lease agreements

Company Secretarial:

- Memorandum of Incorporation (MOI)
- Secretarial records
- Tradename registrations

- Trademark registrations
- CIPC filings Company registration documents
- Statutory registers & compliance records
- Minutes of Shareholder’s meetings
- Minutes of Director’s meetings
- Minutes of Board meetings
- Register of Directors & Officers
- Share Registers & Certificates
- Company Resolutions
- B-BBEE ownership documentation
- B-BBEE shareholding structures

Financial:

- Accounting records
- General ledgers
- Trial balances
- Annual financial statements & reports
- Interim reports
- Auditor details and reports
- Vat records and submissions
- Tax returns and supporting documentation
- Insurance records
- Payroll records
- Invoices issued and received
- Expense records
- Asset registers

Clients:

- Client contracts and engagement agreements
- B-BBEE consulting agreements
- B-BBEE implementation plans and agreements
- B-BBEE scorecard documentation
- Verification preparation documents
- Client company information
- Client contact information
- Client database

- Credit Applications
- Client correspondence
- Project documentation
- Audit preparation files
- B-BBEE ownership and enterprise development documentation
- Supplier development documentation
- Invoices, receipts, credit and debit notes

Suppliers and Service Providers:

- Supplier contracts
- Supplier contact information
- Supplier onboarding documentation
- Supplier invoices
- Supplier B-BBEE Certificates
- Supplier compliance documentation

Beneficiaries:

- ESD Agreements
- ESD Implementation plans
- Shareholder and Director certificates and records
- B-BBEE documentation
- Company and beneficiary contact information
- Coaching registers, records and assessments
- SWOT analyses
- Financial information

Marketing:

- Published Marketing material
- Marketing databases
- Newsletter mailing lists
- Website analytics
- Website contact forms
- Event attendee lists
- Social media engagement records
- Marketing campaign records

IT and System Records:

- System access logs
- Email archives
- Security logs
- Backup records
- User access permissions
- Cybersecurity monitoring records

Operational Records:

- Internal policies and procedures
- Operational manuals
- Training materials
- Strategic plans
- Business continuity plans
- Project documentation

7. Records Available in Terms of Other Legislation

The Company may be in possession of records in terms of the following legislation as and when applicable:

- Basic Conditions of Employment Act, No. 75 of 1997
- Companies Act, No. 71 of 2008
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- Competition Act, No. 89 of 1998
- Constitution of the Republic of South Africa Act, No. 108 of 1996
- The Criminal Procedure Act, No. 51 of 1977
- Employment Equity Act, No. 55 of 1998
- Insolvency Act, No. 24 of 1936
- The Labour Relations Act, No. 66 of 1995
- Skills Development Act, No. 97 of 1998
- Skills Development Levies Act, No. 9 of 1999
- Unemployment Insurance Act, No. 63 of 2001
- Unemployment Insurance Contributions Act, No. 4 of 2002
- Value Added Tax Act, No. 89 of 1991
- Electronic Communication and Transactions Act, No. 25 of 2002
- Income Tax Act, No. 58 of 1962

- Occupational Health and Safety Act No. 85 of 1993
- Intellectual Property Laws Amendment Act No.38 of 1997
- Protection of Personal Information Act, No. 4 of 2013
- Promotion of Access to Information Act, No. 2 of 2000
- Broad-Based Black Economic Empowerment Act, No 53 of 2003

8. Record Retention and Destruction

The Company retains records only for as long as necessary to fulfil the purposes for which they were collected or as required by applicable legislation.

Retention periods may be determined by:

- Legal and regulatory requirements
- Contractual obligations
- Operational or business needs
- Industry best practices

Once records are no longer required, they will be securely destroyed, deleted, or anonymised in accordance with the Company’s data protection policies and applicable legal requirements.

Destruction methods may include:

- Secure shredding of physical documents
- Permanent deletion of electronic records
- Secure destruction of storage media

9. Request Process

Requests for access to records held by the Company must be made in accordance with the procedures prescribed in the Promotion of Access to Information Act, 2000. Requests must be submitted to the Information Officer using the prescribed request form and must provide sufficient detail to enable the Company to identify the requested record.

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

The requester must complete **ANNEXURE “B”**, attached hereto, which is attached hereto and submit it to the Information Officer at the details specified above.

The prescribed form must be submitted as well as payment of a request fee and a deposit, if applicable to the information officer at the postal or physical address, fax number or electronic mail as is stated herein.

The prescribed form must be completed with enough particularity to enable the information officer to determine:

- The record(s) requested;
- The identity of the requestor;
- What form of access is required; and
- The Postal address or fax number of the requestor.

The requestor must state that the records are required for the requestor to exercise or protect a right and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records requested is required to exercise or protect the right.

The request for access will be dealt with within 30 days from date of receipt, unless the requestor has set out special grounds that satisfies the Information Officer that the request be dealt with sooner.

The period of 30 days may be extended by not more than 30 additional days, if the request is for a large quantity of information, or the request requires a search for information held at another office of the Company and the information cannot be reasonably obtained within 30 days. The information officer will notify the requestor in writing should an extension be necessary.

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.

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.

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

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.

10. Grounds for Refusal

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:
- 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.

11. Remedies should a request be refused

The Company does not have an internal appeal procedure in light of a denial of a request, decisions made by the information officer is final;

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.

12. Fees

The following fees shall be payable upon request by a requestor:

Request	Fee
Request fee (payable on every request)	R140.00
Photocopy of an A4 page or part thereof	R2.00

Printed copy of an A4 page or part thereof	R2.00
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00
Hard copy on a compact disc (compact disc to be provided by the Company)	R60.00
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record per A4 page	R24.00
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00
Copy of an audio on a compact disc (compact disc to be provided by the Company)	R60.00
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 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 (cannot exceed total cost)	R435.00
Postage, email or any other electronic transfer	Actual expense, if any.

13. POPIA

Commitment to Lawful Processing

The Company is committed to protecting the privacy of personal information and to ensuring that personal information is processed in a lawful, fair and transparent manner in accordance with the provisions of the Protection of Personal Information Act, 2013.

Personal information will only be collected for specific, explicitly defined and lawful purposes related to the functions and activities of the Company. Personal information will

not be processed in a manner that is incompatible with the purpose for which it was collected.

Conditions for lawful processing:

POPIA has eight conditions for lawful processing and includes:

1. Accountability
2. Processing limitation
3. Purpose specification
4. Further processing limitation
5. Information quality
6. Openness
7. Security safeguards
8. Data subject participation

The Company is involved in the following types of processing:

- Collection
- Recording
- Organization
- Structuring
- Storage
- Adaptation or alteration
- Retrieval
- Consultation
- Use
- Disclosure by transmission
- Dissemination or otherwise making available
- Alignment or combination
- Restriction
- Erasure
- Destruction

The Company processes information for the following purposes:

Service Delivery and Client Engagement

- Providing B-BBEE consulting, advisory, and implementation services
- Conducting B-BBEE assessments and scorecard calculations
- Preparing clients for B-BBEE verification processes

- Providing enterprise and supplier development programme support to beneficiaries
- Managing relationships with clients, beneficiaries, and other stakeholders
- Providing professional advisory and consulting services
- Communicating with clients, suppliers, beneficiaries, and other stakeholders
- Verifying the identity of client representatives and other persons who contact or are contacted by the Company

Business Development and Marketing

- Marketing and promoting the Company's services
- Managing business development activities and sales opportunities
- Managing customer relationship management (CRM) systems
- Providing information to clients about the Company's products and services
- Managing marketing campaigns, events, and promotional activities
- Website administration and digital communications

Operational and Contractual Purposes

- Entering into and fulfilling contractual agreements with clients, beneficiaries, employees, suppliers, and service providers
- Contract administration and management
- Managing supplier and service provider relationships
- Managing internal business operations and administration

Human Resources and Employment

- Recruitment and selection of employees
- Human resource administration and employee management
- Payroll administration and employee remuneration
- Employee training, development, and performance management
- Fulfilling obligations in relation to employees

Financial and Administrative Purposes

- Billing, invoicing, and financial administration
- Maintaining accounting records
- Managing payments and financial transactions

Legal, Regulatory and Compliance Purposes

- Complying with applicable laws, regulations, and statutory obligations
- Maintaining records required by law

- Managing legal and regulatory compliance requirements
- Making authorised disclosures where required by law, regulation, or agreement
- Enforcing or defending the Company’s legal rights and interests

Risk Management and Security

- Risk assessment and risk management
- Information security management
- Fraud detection and prevention
- Monitoring and recording communications for quality assurance, training, investigation, and fraud prevention purposes
- IT security and access management

Business Management and Planning

- Internal reporting, governance, and management oversight
- Strategic planning and business improvement initiatives
- Statistical analysis, research, and trend analysis
- Other Lawful Processing Activities
- Any purposes related to authorised disclosures made in terms of agreements, laws, or regulations
- Any additional purposes expressly authorised by the client or data subject
- Any additional purposes notified to data subjects in applicable privacy notices

Sales, Marketing and Business Development Support

The Company provides business development, marketing and sales support services to beneficiaries as part of its enterprise development and advisory services.

In the course of providing these services, the Company may process personal and business information relating to beneficiaries and third parties.

Personal information captured within customer relationship management systems is used solely for the purpose of managing business relationships and identifying potential opportunities. The Company retains such information only for as long as reasonably necessary for business development purposes or as required by law, after which it will be securely deleted or anonymised.

Where the Company shares business opportunity information with beneficiaries, the beneficiaries remain responsible for ensuring that their own engagement with potential clients complies with applicable data protection and marketing laws.

These activities may include the following:

Sales and Lead Generation Activities

The Company may obtain business contact information from reputable third-party business intelligence providers and publicly available sources for the purpose of identifying potential business opportunities. The Company takes reasonable steps to ensure that such information is obtained from lawful sources and is processed only for legitimate business purposes.

Information obtained may include:

- Business contact details
- Company information
- Industry classification
- Publicly available professional information

Personal information captured within customer relationship management systems is used solely for managing business relationships, tracking opportunities, and supporting business development activities. Purposes may include:

- Lead management
- Sales opportunity tracking
- Relationship management
- Business development activities

The Company takes reasonable steps to ensure that information obtained from third-party platforms is sourced from lawful and reputable providers.

Tender Identification and Distribution

The Company may monitor public and private procurement platforms in order to identify tender opportunities that may be relevant to beneficiaries.

Where relevant opportunities are identified, the Company may:

- Share tender notices
- Share tender portal links
- Distribute opportunity alerts to beneficiaries

The Company does not control the tender processes conducted by third parties and beneficiaries participate in such processes independently.

Marketing and Digital Presence Support

The Company may provide marketing and brand development services to beneficiaries.

This may include access to and management of certain digital platforms belonging to beneficiaries, including:

- LinkedIn profiles
- Company websites
- Social media platforms

- Marketing content platforms

Access to such platforms is granted with the consent and authorisation of the beneficiary.

The Company may perform activities including:

- Profile optimisation
- Website development or maintenance
- Marketing content creation
- Brand positioning
- Digital campaign management

Strategic and Business Development Support

As part of its advisory services, the Company may assist beneficiaries with strategic business development activities.

This may include:

- SWOT analyses
- Business assessments
- Market positioning exercises
- Development of growth strategies
- Preparation for business opportunities

These assessments may include analysis of business information provided by beneficiaries.

Agreements with Beneficiaries

The Company enters into formal agreements with beneficiaries governing the services provided.

These agreements may address matters including:

- Scope of services
- Access to digital platforms
- Confidentiality obligations
- Use of intellectual property such as company logos
- Data protection and information security obligations

The Company may process the following types of information in connection with the services described above:

Business Information

- Company names
- Registration numbers
- Industry sector information
- Business contact details

Professional Contact Information

- Names of business representatives
- Job titles
- Business email addresses
- Business telephone numbers

Marketing and Brand Assets

- Company logos
- Marketing materials
- Website content
- Social media content

Strategic Information

- Business performance insights
- SWOT analysis results
- Market positioning information

Access to beneficiary digital platforms or marketing accounts is provided strictly for the purpose of delivering agreed services and remains under the ownership and control of the beneficiary.

The Company processes personal information the following categories of Data Subjects:

- Employees
- Prospective employees (job applicants)
- Directors
- Shareholders
- Clients
- Client employees
- Client representatives
- Suppliers
- Service providers
- Contractors
- Consultants
- Website users
- Marketing subscribers
- Event attendees
- Regulators and authorities
- Business partners
- Beneficiaries of enterprise or supplier development programmes (relevant for B-BBEE work)

The Company processes the following categories personal information:

Identification Information

- Full name

- ID number / passport number
- Date of birth
- Gender
- Nationality

Contact Information

- Phone number
- Email address
- Physical address
- Postal address

Employment Information

- Job title
- Employment history
- Qualifications
- Professional memberships
- CVs

Financial Information

- Bank account details
- Salary information
- Tax numbers
- Financial statements (where applicable)

B-BBEE Related Information

- Race classification
- Gender
- Disability status
- Ownership information
- Beneficiary information

Electronic Information

- IP addresses
- Device information
- Login credentials
- Email correspondence

Commercial Information

- Company registration details
- Director information
- Shareholding details

Special Personal Information (where applicable)

Special personal information may be processed where required for B-BBEE compliance and verification purposes.

- Race
- Health information (e.g., medical certificates)
- Disability status

Recipients of Personal Information:

Personal information may be shared with:

- Regulatory authorities and government departments
- Professional advisors (legal, accounting, auditing)
- Verification agencies and B-BBEE verification bodies
- IT service providers
- Cloud storage providers
- Payroll administrators
- Financial institutions
- Third-party service providers supporting business operations
- Business partners involved in project delivery
- Law enforcement authorities where required by law

Cross-Border Transfer of Personal Information

Personal information may be transferred outside the Republic of South Africa where:

- The recipient is subject to laws, binding corporate rules, or agreements that provide an adequate level of protection for personal information;
- The data subject consents to the transfer;
- The transfer is necessary for the performance of a contract; or
- The transfer is otherwise permitted under the **Protection of Personal Information Act, 2013**.

Such transfers may occur where the Company utilises international cloud service providers or other third-party service providers.

The Company will ensure that appropriate safeguards, contractual protections, or adequacy requirements are satisfied before transferring personal information outside South Africa.

Security Measures to Protect Personal Information

The Company shall take appropriate, reasonable technical and organisational measures to prevent the loss of, damage to, or unauthorised destruction of personal information, and to prevent unlawful access to or processing of personal information.

These measures include:

- Access control and user authentication systems
- Password protection and secure IT systems
- Firewalls and cybersecurity monitoring
- Secure storage of physical records
- Confidentiality agreements with employees and service providers
- Regular review of security policies and procedures
- Data protection training for employees
- Secure backup and recovery systems

Where third-party service providers process personal information on behalf of the Company, appropriate contractual safeguards are implemented to ensure the protection of such information.

The personal information that is stored physically is protected as follows:

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.

14. Personal Information Breach Notification

Where the Company has reasonable grounds to believe that personal information of a data subject has been accessed or acquired by an unauthorised person, the Company will:

- Notify the Information Regulator as soon as reasonably possible
- Notify affected data subjects where required by law
- Provide sufficient information to allow data subjects to take protective measures
- Investigate the incident and implement corrective measures to prevent recurrence

Notification will occur in accordance with the requirements of the Protection of Personal Information Act, 2013.

14. Data Subject Rights

Data subjects have the right to request access to personal information held by the Company, to request the correction or deletion of personal information, and to object to the processing of personal information in accordance with the provisions of the Protection of Personal Information Act, 2013.

Objection to the processing of personal information by a data subject:

Section 11(3) of POPIA and regulation 2 of the POPIA 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 “C”**, attached hereto.

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 and/or deleted in the prescribed form attached hereto as **ANNEXURE “D”** attached hereto.

Complaints

A data subject who believes that the Company has not complied with its obligations under the Protection of Personal Information Act may submit a complaint to the Information Officer.

The complaint must contain sufficient detail to allow the Company to investigate the matter.

If the data subject is not satisfied with the outcome, the complaint may be referred to the Information Regulator.

ANNEXURE A

FORM 1

REQUEST FOR A COPY OF THE GUIDE

[Regulations 3]

TO: The Information Officer

I,

Full names:			
In my capacity as (mark with "x"):	Information officer		Other
Name of *public/private body (if applicable)			
Postal Address:			
Street Address:			
E-mail Address:			
Facsimile:			
Contact numbers:	Tel.(B):		Cellular:

Hereby request the following copy (ies) of the Guide:

Language (mark with "X")	No of copies	Language (mark with "X")	No of copies
Sepedi		Sesotho	
Setswana		siSwati	
Tshivenda		Xitsonga	
Afrikaans		English	
isiNdebele		isiXhosa	
isiZulu			

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

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

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS
(Mark the applicable box with an "X")

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
(Mark the applicable box with an "X")

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

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.

Indicate which right is to be exercised or protected	

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

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

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

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

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

Signature of Information Officer

ANNEXURE C

FORM 1

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2017**
[Regulation 2(1)]

Note:

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

Reference Number....

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

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

Signed at this day of20.....

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

ANNEXURE D

FORM 2

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

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

Note:

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

Reference Number....

Mark the appropriate box with an "x".

Request for:

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

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

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

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

* *Delete whichever is not applicable*

Signed at this day of20.....

.....
Signature of Data subject

ANNEXURE E

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

Note:

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

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

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

2. You requested:

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

3. To be submitted:

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

Kindly note that your request has been:

Approved

Denied, for the following reasons:

--

4. Fees payable with regards to your request:

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

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

Yes

No

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

The amount must be paid into the following Bank account:

Name of Bank: _____
 Name of account holder: _____
 Type of account: _____
 Account number: _____
 Branch Code: _____
 Reference Nr: _____
 Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

 Information officer