INGRAIN SA (PTY) LTD

PAIA AND POPIA MANUAL

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”) (as amended) and in compliance with the requirements of the Protection of Personal Information Act, No.4 2013 (“POPIA”)

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1 PURPOSE OF THE MANUAL

1.1 for the purposes of PAIA, this manual ("Manual") details the procedure to be followed by a requester and the way a Request for Access will be facilitated; and

1.2 for the purposes of POPIA, amongst other things, this Manual details the purpose for which Personal Information may be processed; a description of the categories of Data Subjects for whom the Company processes Personal Information as well as the categories of Personal Information relating to such Data Subjects; and the recipients to whom Personal Information may be supplied.

2 THE MANUAL

2.1 This Manual is compiled in accordance with Section 51 of PAIA, as amended by POPIA. This Manual applies to all Records held with Ingrain SA (Pty) Ltd (hereafter referred to as 'Company'), a company duly registered in accordance with the laws of the Republic of South Africa, with registration number 1945/020077/07.

2.2 This Manual sets out:

(1) the categories of Records held by the Company which are available without a person having to submit a formal PAIA request;

(2) the description of the Records held by the Company which are available in accordance with any other legislation;

(3) Personal information that is processed by the Company, the purpose of processing Personal information and the description of the categories of data subjects and of the

(4) information or categories of information relating thereto;

(5) the recipients or categories of recipients to whom the Personal information may be supplied;

(6) how does any person goes about requesting information, including Personal information, which they believe the Company holds and which they have a right to;

(7) which forms must be completed by such person requesting the information in accordance with the prescribed PAIA Fee Schedule published under Government Notice R187 of 15 February 2002, as amended;

(8) how to lodge a withdrawal, objection or complaint against the processing by the Company of Personal information in terms of POPIA;

(9) how to make or file a request for the Company to delete or destroy Personal information in terms of POPIA; and

(10) the transfer of Personal information outside the Republic of South Africa.

3 COMPANY DETAILS

3.1 The details of the Company are as follows:

Physical Address: 6, Anvil Road Isando, 1600, Gauteng

Postal address: Private Bag 2019, Isando, 1600, Gauteng,

Telephone: 011 458 5000

CEO: Dr Nandkishore Menon

Website: www.ingrainsa.com

4 CONTACT DETAILS OF THE INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER

4.1 The CEO of the Company has been appointed as the Information Officer.

The contact details of the Information Officer and Deputy Information officer are as follows:

Information Officer: DR Nandkishore Menon

Designation: Chief Executive Officer

Contact number: 011 458 5000

Deputy Information Officer: Alfred Raulinga

Designation: Chief Information Officer

Contact number: 011 458 5000

5 INFORMATION REGULATOR GUIDE

5.1 A guide outlining how an individual can exercise their rights under PAIA is available on the Information Regulator's website (https://www.inforegulator.org.za/wp-content/uploads/2020/07/PAIA-GUIDE) in all official South African languages.

5.2 Any request to obtain a copy of the Guide must closely follow Form 2 in Annexure A of the PAIA Regulations, 2021. The form can be accessed via the following link: InfoRegSA-PAIA-Form02-Reg7.pdf

5.3 Any queries regarding the Guide should be directed to the Information Regulator at:

The Information Regulator (South Africa)
Woodmead North Office Park
54 Maxwell Drive,
Woodmead
Johannesburg
2191
P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: paiacomplaints@inforegulator.org.za
General enquiries email: enquiries@inforegulator.org.za.

6 INFORMATION AUTOMATICALLY AVAILABLE WITHOUT PAIA REQUEST

6.1 All information that is publicly available on the Company website and social media platforms, is automatically available and can be automatically accessed by anyone, subject to our website terms of use, without having to go through the formal PAIA request process.

6.2 The aforesaid automatically available information is available on the Company website: http://www.ingrainsa.com.

6.3 Should any additional categories of Records be designated for automatic disclosure under section 52(2) of PAIA in the future, this Manual will be updated accordingly.

7 RECORDS NOT AUTOMATICALLY AVAILABLE IN TERMS OF SECTION 51(1)(E) OF PAIA

7.1 The Records set out in Appendix 1 are not automatically available and must be requested through the formal access procedure outlined in this Manual, using **Appendix 3**, form 2. This list is not exhaustive, and any request for access to Records not included herein will be considered in accordance with the provisions of PAIA.

8 RECORDS KEPT IN TERMS OF OTHER LEGISLATIONS.

8.1 The Company is subject to various laws and regulations that impose obligations to retain specific categories of Records

8.2 These laws are detailed in **Appendix 2** “Applicable legislation”.

8.3 This list is not exhaustive and will be reviewed and updated as required.

9 PROCEDURE TO REQUEST FOR ACCESS IN TERMS OF PAIA

9.1 A requester must comply with all the procedural requirements as contained in section 53 of PAIA relating to a Request for Access to a Record.

9.2 A requester must complete the prescribed Request for Access form **Appendix 3**, and submit the completed Request for Access form as well as payment of a request fee (if applicable) and a deposit (if applicable), to the Information Officer at the postal or physical address, facsimile number or electronic mail address stated in clause 4 above.

9.3 The Request for Access form must be completed with enough detail to enable the Information Officer to identify the following:

(1) the Record/s requested;

(2) the identity of the requester;

(3) the form of access that is required, if the request is granted;

(4) the postal address or email address of the requester; and

(5) the right that the requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such right.

9.4 If a Request for Access is made on behalf of another person, the requester must submit proof of his/her authority to do so and the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.

9.5 The Company will voluntarily provide the requested Records to a Personal Requester (as defined in section 1 of PAIA). The prescribed fee for reproduction of the Record requested by a Personal Requester will be charged in accordance with section 54(6) of PAIA and paragraph 13 below.

10 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS IN TERMS OF PAIA

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

(1) the protection of Personal information of a third person (who is a natural person) from

unreasonable disclosure.

(2) the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific, or technical information that may harm the commercial or financial interests of a third party).

(3) if disclosure would result in the breach of a duty of confidence owed to a third party.

(4) if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person.

(5) if the Record was produced during legal proceedings unless that legal privilege has been waived.

(6) if the Record contains trade secrets, financial or sensitive information or any information that would put the Company at a disadvantage in negotiations or prejudice it in commercial competition; and/or

(7) if the Record contains information about research being conducted or about to be conducted on behalf of a third party or by the Company.

(8) if the request is manifestly frivolous, vexatious, or amounts to an abuse of the access process.

10.2 Section 70 of PAIA contains an overriding provision. Disclosure of a Record is compulsory if it reveals evidence of a serious public safety risk, contravention of the law, or if public interest outweighs harm.

11 INFORMATION OR RECORDS NOT FOUND

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

12 REMEDIES AVAILABLE TO THE REQUESTER UPON REFUSAL OF A REQUEST FOR ACCESS

12.1 If the Information Officer decides to grant a requester access to the Record, such access must be granted within 30 (thirty) days of being informed of the decision.

12.2 If the request is refused, the Company does not have internal appeal procedures. As such, the decision made by the Information Officer is final. If the Requestor is not satisfied with the outcome, he/she is entitled to apply to the Information Regulator or a court of competent jurisdiction to take the matter further within 180 days of being notified of the decision.

13 FEES

13.1 Once a request is made, the Information Officer will send an acknowledgement of receipt

notice specifying the amount of the prescribed fee and the payable deposit, if applicable; inform the requester of their right to lodge a complaint with the Information Regulator or apply to a court against the tender or payment of the request fee or the deposit, as the case may be; and outline the procedure, including the applicable time period, for lodging such complaint or application.

13.2 Payment of this fee is to be made as directed by the Information Officer.

13.3 This prescribed request fee set out in **Appendix 4**, must be paid before the request is processed. In the event the search requires more that the prescribed hours, the Information Officer will notify to pay as a deposit, the prescribed portion of the access fee (being not more than one third) which would be payable if the Request for Access is granted.

13.4 If a deposit has been paid in respect of a Request for Access which is refused, the Information Officer will repay the deposit to the requester.

14 TIMELINE TO CONSIDER REQUESTS

14.1 Requests will be processed within 30 (thirty) days, from date of receipt of the request, or in the case where the request requires payment, 30 days upon receipt of proof of payment, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

14.2 Should an extension be required, the Requestor will be notified, together with reasons explaining why the extension is necessary, which in most cases shall be a period of 30 (thirty) days.

15 REQUESTS AFFECTING THIRD PARTIES

15.1 If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the Record.

15.2 Where a third party is affected by the request for access and the Information Officer has decided to grant the Requestor access to the Records, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, the Requestor must be granted access to the Record. The Company will not disclose the requested information to the Requestor until the 30-day appeal period has lapsed or any appeal brought by the third party has been resolved.

16 AVAILABILITY OF THE MANUAL

16.1 This Manual is made available in terms of PAIA and section 4 of the Regulations to POPIA.

16.2 This Manual is also available at: https://www.ingrainsa.com

16.3 No fee will be levied for inspection as contemplated in this clause.

16.4 Copies of the Manual can be obtained from the Information Officer. A fee will be levied for copies of the manual in accordance with **Appendix 4.**

17 PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY THE COMPANY

17.1 Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

17.2 The Company processes Personal Information relating to both individual and juristic persons to carry out its business and organisational functions. The way this information is processed and the purpose for which it is processed is determined by the Company. The Company is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

(1) is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Company, in the form of privacy or data collection notices. Ingrain SA must also have a legal basis (for example, consent) to process Personal Information;

(2) is processed only for the purposes for which it was collected;

(3) will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

(4) is adequate, relevant and not excessive for the purposes for which it was collected;

(5) is accurate and kept up to date;

(6) will not be kept for longer than necessary;

(7) is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by the Company, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;

(8) is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:

(a) be notified that their Personal Information is being collected by the Company. The Data Subject also has the right to be notified in the event of a data breach;

(b) know whether the Company holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;

(c) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;

(d) object to the Company's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the

Company's Record keeping requirements);

(e) object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and

(f) complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its Personal information.

17.3 Purpose of the Processing of Personal Information by the Company

As outlined above, Personal Information may only be Processed for a specific purpose. The purposes for which the Company processes or will process Personal Information are set out in **Part 1 of Appendix 5.**

17.4 Categories of Data Subjects and Personal Information/special Personal Information relating thereto

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. **Part 2 of Appendix 5** sets out the various categories of Data Subjects that the Company Processes Personal Information on and the types of Personal Information relating thereto.

17.5 Recipients of Personal Information

Part 3 of Appendix 5 outlines the recipients to whom the Company may provide Data Subjects Personal Information to.

17.6 Cross-border flows of Personal Information

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

(1) recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or

(2) Data Subject consents to the transfer of their Personal Information; or

(3) transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or

(4) transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or

(5) the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would likely provide such consent.

Part 4 of Appendix 6 sets out the planned cross-border transfers of Personal Information and the condition from above that applies thereto.

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

Part 5 of Appendix 5 sets out the types of security measures implemented by the Company to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by the Company may be conducted to ensure that the Personal Information that is processed by the Company is safeguarded and processed in accordance with the Eight (8) Conditions for Lawful Processing.

17.8 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 his/her/its Personal Information in the prescribed form attached to this manual as **Appendix 6** subject to exceptions contained in POPIA.

17.9 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 **Appendix 7** to this Manual.

Appendix 1

Description of the subjects on which the Company holds Records, and the categories of Records held on each subject. Each of these Records are available on request in terms of PAIA

1 Client Services Records

1.1	Client correspondence;	1.2	Client fee files;
1.3	Client contracts;	1.4	Client business information;
1.5	Legal documentation;	1.6	Working papers;
1.7	Proposal and tender documents;	1.8	Project plans
1.9	Risk management Records; Solution methodologies	1.10	Standard terms and conditions of supply of goods and/or services

2 Corporate Governance

2.1 Codes of conduct	2.2 Corporate social investment Records
2.3 Board meeting minutes	2.4 Executive committee meeting minutes
2.5 Legal compliance Records	2.6 Policies

3 Finance and Administration

3.1 Accounting Records	3.2 Annual financial statements
3.3 Agreements; Banking Records	3.4 Correspondence
3.5 Purchase orders	3.6 Remittances
3.7 Invoices and statements	3.8 Tax Records and returns
3.9 Statistics SA returns	

4 Human Capital

4.1 BEE statistics	4.2 Career development Records
4.3 Personnel information	4.4 Employment equity reports
4.5 General terms of employment	4.6 Letters of employment
4.7 Leave Records	4.8 PAYE Records and returns
4.9 Performance management Records	4.10 Assessments; Policies and procedures
4.11 UIF returns	4.12 Retirement benefit
4.13 Medical Aid Records	

5 Information Management and Technology

5.1 Agreements	5.2 Equipment register
5.3 Information policies	5.4 IT Standards, procedures and guidelines

6 Learning and Education

6.1 Training material	6.2 Training Records and statistics
6.3 Learnership Programs	6.4 Training agreements

7 Marketing and Communication

8.1 Proposal documents	8.2 New business development
8.3 Brand information management	8.4 Marketing strategies
8.5 Communication strategies	8.6 Agreements
8.7 Client relationship programmes	8.8 Marketing publications and brochures
8.9 Sustainability programmes	

8 Operations

9.1 Access control Records	9.2 Agreements
9.3 Archival administration documentation	9.4 Communication strategies
9.5 General correspondence	9.6 Patents and Trademark documents
9.7 Insurance documentation	9.8 PABX management information
9.9 Service level agreements	9.10 Standard trading terms and conditions of supply of services and goods
9.11 Travel documentation	9.12 Procurement agreements and documentation
9.13 Used order books	9.14 Vehicle registration documents
9.15 Cellular phone registration documents, including RICA	

9 Secretarial Services

9.1	Applicable statutory documents, including but not limited to, certificates of incorporation and certificates to commence business;	9.2	Corporate structure documents;
9.3	Memoranda of Incorporation and Articles of Association;	9.4	Share/Securities registers;
9.5	Statutory Returns to relevant authorities;	9.6	Share certificates;
9.7	Shareholder agreements;	9.8	Minutes of meetings;
9.9	Resolutions passed.		

Appendix 2

LIST OF APPLICABLE LEGISLATION

1. PAIA
2. POPIA
3. Basic Conditions of Employment Act 75 of 1997
4. Companies Act 71 of 2008
5. Competition Act 89 of 1998
6. Compensation for Occupational Injuries and Diseases Act 130 of 1993
7. Constitution of South Africa Act 108 of 1996
8. Electronic Communications and Transactions Act 25 of 2002
9. Employment Equity Act 55 of 1998
10. Labor Relations Act 66 of 1995
11. Occupational Health and Safety Act 85 of 1993
12. Pension Funds Act 24 of 1956
13. Unemployment Insurance Act 63 of 2001
14. Unemployment Insurance Fund Contributions Act 4 of 2002

Although we have used our best endeavors to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a requester believes that a right of access to a Record exists in terms of other legislation listed above or any other legislation, the requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

Appendix 3

FORM 2

REQUEST FOR ACCESS TO RECORD – PAIA Regulations

[Regulation 7]

Note:

1. Proof of identity must be attached by the requester.

2. If requests are made on behalf of another person, proof of such authorisation must be attached to this form.

TO: The information officer

_____
_____
_____
_____

(Address)

E-mail address: _____

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 (*when made on behalf of another person*):

Postal Address:
Street Address:
E-mail Address
Contact numbers:
Tel.(B):

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):

Cellular:

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the Record to which access is requested, including the reference number if that is known to you, to enable the Record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of Record or relevant part of the Record:

Reference number, if available:

Any further particulars of Record:

TYPE OF RECORD

(Mark the applicable box with an "X")

Record is in written or printed form

Record comprises virtual images (this includes photographs, slides, video Recordings, computer-generated images, sketches, etc.)

Record consists of Recorded words or information which can be reproduced in sound

Records are held on a computer or in an electronic, or machine-readable form

FORM OF ACCESS

(Mark the applicable box with an "X")

Printed copy of Record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)

Written or printed transcription or virtual images (this includes photographs, slides, video Recordings, computer-generated images, sketches, etc.)

Transcription of soundtrack (written or printed document)

Copy of Record on flash drive (including virtual images and soundtracks)

Copy of Record on compact disc drive (including virtual images and soundtracks)

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 *(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)*

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)

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:

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	Electronic communication (*Please specify*)

Signed at _____on this _____day of _____

20_____

_____

Signature of requester / person on whose behalf request is made

……

FOR OFFICIAL USE

Reference number:

Request received by: *(state rank, name and surname of information officer)*

Date received:

Access fees:

Deposit (if any):

_____

Signature of information officer

Appendix 4

FEES IN RESPECT OF PRIVATE BODIES

Item	Description	Amount
1.	The request fee is payable by every requester	R140.00
2.	Photocopy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by Requestor)	R40.00
	(ii) Compact disc	R40.00
	• If provided by Requestor	R60.00
	• If provided to the Requestor	
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
7.	Transcription of an audio Record, per A4-size page	R24.00
8.	Copy of an audio Record on: (i) Flash drive (to be provided by Requestor)	R40.00
	(ii) Compact disc	R40.00
	• If provided by Requestor	R60.00
	• If provided to the Requestor	
9.	To search for and prepare the Record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for	R145.00

	such search and preparation. To not exceed the total cost of	R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

Appendix 5

Part 1

PROCESSING PERSONAL INFORMATION IN ACCORDANCE WITH POPIA

Purpose of the Processing of Personal Information	Type of Processing
1 To provide services to the Customer in accordance with terms agreed by the Customer; 2 To undertake activities related to the provision of services and transactions, including: 2.1 to fulfil foreign and domestic legal, regulatory and compliance requirements and comply with any applicable treaty or agreement with or between foreign and domestic governments applicable to the Company; 2.2 to verify the identity of Customer representatives who contact the Company or may be contacted by the Company; 2.3 for risk assessment, information security management, statistical, trend analysis and planning purposes; 2.4 to monitor and Record calls and electronic communications with the Customer for quality, training, investigation and fraud prevention purposes; 2.5 for crime detection, prevention, investigation and prosecution; 2.6 to enforce or defend the Company's rights; and 2.7 to manage the Company's relationship with the Customer. 3 The purposes related to any authorised disclosure made in terms of agreement, law or regulation;	Collection, Recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4	Any additional purposes expressly authorised by the Customer; and	
5	Any additional purposes may be notified to the Customer or Data Subjects in any notice provided by the Company.	

Part 2

Categories of Data Subjects and categories of Personal Information relating thereto

Categories of Data Subjects and categories of Personal Information relating thereto	**Data Subject**	**Personal Information Processed**
Customer: ➢ *Corporate* Customer Profile information including, account details, payment information, corporate structure, customer risk rating and other customer information including to the extent the categories of information relate to individuals or representatives of customers (e.g., shareholders, directors etc.) required for the above-mentioned purposes ➢ *Individual* Name; contact details (Company E-Mail Address, Company Telephone Number), client details (Home Facsimile Number, Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); regulatory identifiers (e.g. tax identification number); Account information (Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type, Bank account balance); transaction details and branch details; "know-your customer" data, photographs; other identification and verification data as contained in images of ID card, passport and other ID documents; images of customer signatures)	• Natural Persons; • Juristic Persons.	Personal Information relating to a Data Subject received by or on behalf of the Company from the Customer, Customer affiliates and their respective representatives and related parties while providing accounts and services to the Customer or in connection with transactions or services. Customer Personal Information may include names, contact details, identification and verification information, nationality and residency information, taxpayer identification numbers, voiceprints, bank account and transactional information (where legally permissible), to the extent that these amount to Personal Information under POPIA.

Payment beneficiaries: Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type; beneficiary address, transaction details; payment narrative and, for certain data transferred from the UK only, National Insurance numbers.		
Personnel: Name; employee ID number; business contact details (address/telephone number/email address)		

Part 3

Recipients of Personal Information

The Company, its affiliates and their respective representatives

Part 4

Cross border transfers of Personal Information

When making authorized disclosures or transfers of Personal Information in terms of section 72 of POPIA, Personal Information may be disclosed to recipients located in countries which do not offer a level of protection for that Personal Information as high as the level of protection afforded in South Africa.

Part 5

Description of information security measures

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

1 Access Control of Persons

The Company has implemented suitable measures to prevent unauthorized persons from gaining access to the data processing equipment where data is processed.

2 Data Media Control

The Company has implemented suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by the Company and containing Personal data of Customers.

3 Data Memory Control

The Company has implemented suitable measures to prevent unauthorized input into data memory and the unauthorized reading, alteration or deletion of stored data.

4 User Control

The Company has implemented suitable measures to prevent its data processing systems from being used by unauthorized persons by means of data transmission equipment.

5 Access Control to Data

The Company represents that the persons entitled to use the Company's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorization).

6 Transmission Control

The Company has enabled the verification and tracing of the locations / destinations to which the Personal information is transferred by utilization of the Company's data communication equipment / devices.

7 Transport Control

The Company has implemented suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

8 Organization Control

The Company maintains its internal organization in a manner that meets the requirements of this Manual.

Appendix 6

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

Note:

1 Affidavits or other documentary evidence as applicable in support of the objection may be attached.

2 If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

3 Complete as is applicable.

A	**DETAILS OF DATA SUBJECT**
Name(s) and surname/ registered name of Data Subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	**DETAILS OF RESPONSIBLE PARTY**
Name(s) and surname/ registered name of Responsible Party:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	

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

Signed at ..... this ..... day of .....20……...

.....

Signature of data subject/designated person

Appendix 7

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

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.

2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

3. Complete as is applicable.

Mark the appropriate box with an "x".

Request for:

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

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

A	**DETAILS OF DATA SUBJECT**
Name(s) and surname/ registered name of Data Subject:	

Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	**DETAILS OF RESPONSIBLE PARTY**
Name(s) and surname/ registered name of Responsible Party:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
C	**REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)**

D	**REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE**

	PARTY IS NO LONGER AUTHORISED TO RETAIN. (Please provide detailed reasons for the request)