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**MANUAL PUBLISHED IN TERMS OF SECTION 51 OF  
THE PROMOTION OF ACCESS TO INFORMATION ACT, NO. 2 of 2000**

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by

**ADUMO ONLINE PROPRIETARY LIMITED**

(Registration Number 2013/025842/07)



Published 29-09-2021

## 1 GROUP OF COMPANIES

- 1.1 Adumo Online Proprietary Limited, registration number 2013/025842/07 ("**Company**") is a private body as defined in the Promotion of Access to Information Act, No. 2 of 2000 ("**Act**").
- 1.2 This manual is compiled in relation to the Company and its subsidiaries, being –
  - 1.2.1 Crossfin APIS Transactional Solutions (Proprietary) Limited, registration number 2017/541983/07;

## 2 ACCESS TO INFORMATION

- 2.1 The motivation for the Act is found in the Constitution of South Africa which provides that everyone has a right of access to information held –
  - 2.1.1 by the state, where no reason for access to the information needs to be established (section 32(1)(a)); or
  - 2.1.2 by a private body, if the requestor requires a record for the exercise or protection of any right (section 32(1)(b)).
- 2.2 The Constitution further requires that legislation be enacted to give effect to the provision of section 32 of the Constitution. The Act has been enacted to meet this requirement.
- 2.3 In terms of the Act any person has a right of access to a record held by or under the control of a private body if (a) the record is required for the exercise or protection of any right, (b) the requestor has complied with all the procedural requirements of the Act, and (c) no grounds for refusal can be established by the private body allowing them to refuse access to the record requested.
- 2.4 The grounds for refusal established in the Act are –
  - 2.4.1 mandatory protection of the privacy of a third party who is a natural person (human being);
  - 2.4.2 mandatory protection of commercial information of a third party;
  - 2.4.3 mandatory protection of certain confidential information of a third party;
  - 2.4.4 mandatory protection of the safety of individuals, and the protection of property;
  - 2.4.5 mandatory protection of records privileged from production in legal proceedings;
  - 2.4.6 commercial information of a private body;
  - 2.4.7 mandatory protection of research information of a third party and of a private body.
- 2.5 The first step in assessing a request is to determine if the request is procedurally correct. This is facilitated by the requester ("**Requestor**") properly and fully completing the information required in the request. If assistance is required, the information officer ("**IO**") will render reasonable assistance to a Requester to comply with the procedures set out in the Act. The IO will also require that the Requester is properly identified and that the applicable fee and, if applicable a deposit, has been paid. Once these requirements have all been fully satisfied a 30 day period begins to run and the IO is obliged to give the Requester notice of the IO's decision during that 30 day period.
- 2.6 The second step in assessing a request is to determine if the Requester has evidenced, in the request, that the Requestor requires the record to exercise or protect a right. If the IO is satisfied that the information provided by the Requester supports this requirement, the third step will be conducted.
- 2.7 The third step in assessing a request is to determine if the IO must or may refuse the request on the basis of a ground for refusal. In some cases this decision is mandatory, and in others it is discretionary.
- 2.8 Once the IO has made a decision the IO must inform the Requester of the decision and, if the request is refused, provide reasons for the refusal.
- 2.9 If the Requester is aggrieved by either the fees charged for access to a record, the form in which access is provided to a record, or by a refusal to grant access to a record, the Requester is entitled to apply to court for appropriate relief, within 30 days of receiving notice of the decision.

- 2.10 The Company endorses the object of the Act, which is to give effect to the constitutional right of access to information, subject to justifiable limitations. The manual is intended to assist a Requester in exercising this right.

### **3 INFORMATION REQUIRED UNDER SECTION 51(1)(a)**

- 3.1 IO of Company: Willem de Swardt.
- 3.2 Company Postal Address: Century City, The Colosseum Foyer 3, 1<sup>st</sup> Floor, Century Way, Cape Town, 7441.
- 3.3 Company Street Address: Century City, The Colosseum Foyer 3, 1<sup>st</sup> Floor, Century Way, Cape Town, 7441.
- 3.4 Company telephone no.: +27 (0) 21 555 3260
- 3.5 Company fax. no.: none
- 3.6 IO e-Mail address: [willem.deswardt@adumoonline.com](mailto:willem.deswardt@adumoonline.com)

### **4 DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10: SECTION 51(1)(b)**

A Guide has been compiled in terms of section 10 of the Act by the South African Human Rights Commission. It contains information required by a person wishing to exercise any right contemplated by the Act. It is available in all of the official languages. The Guide is available for inspection, *inter alia*, at the office of the offices of the Human Rights Commission at –

- 4.1 street address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, Gauteng;
- 4.2 website: [www.sahrc.org.za](http://www.sahrc.org.za)

### **5 VOLUNTARY DISCLOSURE**

- 5.1 In terms of section 52(1), the Company may make certain categories of records automatically available without the Requester having to request access in terms of the Act. These would include –
- 5.1.1 reports;
- 5.1.2 other literature intended for public viewing;
- 5.1.3 public customer information.
- 5.2 If the Requester believes that any other statutory instrument allows access to a record this should be referred to the IO who will within a reasonable period (not more than 10 days) consider a request in the light thereof.

### **6 RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION: SECTION 51(1)(d)**

Records available in terms of other legislation include those in relation to –

- 6.1 Basic Conditions of Employment No. 75 of 1997
- 6.2 Bills of Exchange Act No. 34 of 1964
- 6.3 Broad Based Black Economic Empowerment Act No. 53 of 2003
- 6.4 Companies Act No. 71 of 2008
- 6.5 Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- 6.6 Competition Act No. 89 of 1998
- 6.7 Consumer Protection Act No. 68 of 2008
- 6.8 Copyright Act No. 98 of 1978
- 6.9 Employment Equity Act No. 55 of 1998
- 6.10 Electronic Communications Act No. 36 of 2005
- 6.11 Electronic Communications and Transactions Act No. 25 of 2002
- 6.12 Financial Intelligence Centre Act No. 38 of 2001
- 6.13 General Pensions Act No. 29 of 1979

- 6.14 Income Tax Act No. 95 of 1967
- 6.15 Insolvency Act No. 24 of 1936
- 6.16 Intellectual Property Laws Amendments Act No. 38 of 1997
- 6.17 Labour Relations Act No. 66 of 1995
- 6.18 National Credit Act No. 34 of 2005
- 6.19 Occupational Health & Safety Act No. 85 of 1993
- 6.20 Pension Funds Act No. 24 of 1956
- 6.21 Prevention and Combating of Corrupt Activities Act No. 12 of 2004
- 6.22 Promotion of Access to Information Act No. 2 of 2000
- 6.23 Protection of Personal Information Act No. 4 of 2013 ("**POPI**")
- 6.24 Regulation of Interception of Communications and Provision of Communication Related Information Act No. 70 of 2002
- 6.25 Securities Transfer Tax Act No. 25 of 2007
- 6.26 Securities Transfer Tax Administration Act No. 26 of 2007
- 6.27 Skills Development Levies Act No. 9 of 1999
- 6.28 Skills Development Act No. 97 of 1998
- 6.29 Trade Marks Act No. 194 of 1993
- 6.30 Uncertificated Securities Tax Act No. 31 of 1998
- 6.31 Unemployment Contributions Act No. 4 of 2002
- 6.32 Unemployment Insurance Act No. 63 of 2001
- 6.33 Value Added Tax Act No. 89 of 1991

## **7 SUBJECTS AND CATEGORIES OF RECORDS HELD: SECTION 51(1)(e)**

- 7.1 Companies Act records: documents of incorporation, memorandum and articles of association, memorandum of incorporation, minutes of board meetings, share register and other statutory registers, and records relating to the appointment of directors, auditor, company secretary, public officer and other officers.
- 7.2 Financial records: annual financial statements, tax returns, accounting records, banking records, bank statements, paid cheques, electronic banking records, asset register, rental agreements, invoices.
- 7.3 Income tax records: SITE, PAYE, documents issued to employees for income tax purposes, records of payments made to SARS on behalf of employees, VAT, regional services levies, skills development levies, UIF, workmen's compensation.
- 7.4 Personnel documents and records: employment contracts, employment equity plan, medical aid records, pension fund records, disciplinary records, salary records, SETA records, disciplinary code, leave records, training records, training manuals.
- 7.5 Intellectual property: trademarks, copyright, licenses.
- 7.6 Marketing and sales: market information, public customer information, product brochures, owner manuals, product sales records, marketing strategies, customer database.
- 7.7 Immovable and moveable property: agreements for property leased by the Group, leases in respect of vehicles, office equipment leases.
- 7.8 Insurance policies.
- 7.9 Contracts: standard contracts, contracts with clients, contracts with suppliers, contracts with service providers, contracts with professional advisers, contracts with other third parties.

## 8 DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS: SECTION 51(e)

- 8.1 The Requester must complete APPENDIX 1 and submit this form together with a request fee, to the IO.
- 8.2 The form must be submitted to the IO at the Company's address, fax number, or the IO's email address.
- 8.3 The form must –
  - 8.3.1 provide sufficient particulars to enable the IO to identify the records requested and to identify the Requester;
  - 8.3.2 indicate which form of access is required;
  - 8.3.3 specify a postal address or fax number of the Requester in the RSA;
  - 8.3.4 identify the right that the Requester is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right;
  - 8.3.5 if in addition to a written reply the Requester wants to be informed of the decision on the request in any other manner, state that manner and the necessary particulars to be informed;
  - 8.3.6 if the request is made on behalf of another person, submit proof of the capacity in which the Requester is making the request, to the reasonable satisfaction of the IO.

## 9 THE LATEST NOTICE IN TERMS OF SECTION 52(2) (IF ANY)

At this stage no notices have been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

## 10 POPI

- 10.1 In this section 10, the following terms (and similar expressions) have the corresponding meanings –
  - 10.1.1 "**Process**" means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal information, including: (a) 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.
  - 10.1.2 "**Personal Information**" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, comprising –
    - 10.1.2.1 personal information including (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, 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; and
    - 10.1.2.2 special personal information including (a) religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information (personal identification based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition) of a data subject, or (b) criminal behaviour of a data subject to the extent that it relates to (i) the alleged commission by a data subject of any offence, or (ii) any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.
- 10.2 Processing of Personal Information by members of the Group, is governed by POPI. Members of the Group are obliged to meet the Processing conditions stipulated by POPI when Processing Personal

Information. As a general guide (but note that this information may be incomplete) these Processing conditions comprise the following principles –

- 10.2.1 Accountability: the responsible party must ensure that these conditions and the measures that give effect to them are complied with at the time of the determination of the purpose and means of the Processing and during the Processing itself.
- 10.2.2 Processing Limitation: Personal Information may be processed (a) lawfully and in a reasonable manner that does not infringe the data subject's privacy, (b) if, given its purpose for being Processed, it is adequate, relevant and not excessive, (c) with consent, or if it is necessary to perform a contract relating to the data subject, or if required by law, or if it protects or if it is necessary for pursuing a legitimate interest of the data subject, (d) until consent is withdrawn or processing is objected to by the data subject. Personal Information must be collected from the data subject unless it is available in public records, or has been made public by the data subject, or the data subject has consented to it being collected from another source, or it not reasonably practicable to collect it from the data subject in a specific case. A data subject may object to the Processing of Personal Information by completing and submitting APPENDIX 2.
- 10.2.3 Purpose Specification: Personal Information must be collected for a specific, explicitly defined and lawful purpose related to a function or activity of the responsible party and must not be retained any longer than necessary to achieve the purpose for which it was collected or subsequently Processed unless required by law or contract or if it is reasonably required for lawful purposes or consent has been given. Once it may no longer be retained, Personal Information must be destroyed or de-identified. Processing of Personal Information must be restricted if the data subject contests its accuracy.
- 10.2.4 Further Processing Limitation: Further Processing must be compatible with the purpose for which it was originally collected.
- 10.2.5 Information Quality: the responsible party must take reasonably practicable steps to ensure that Personal Information is complete, accurate, not misleading and is updated where necessary.
- 10.2.6 Openness: if Personal Information is collected, the responsible party must take reasonably practical steps to ensure the data subject is aware of (a) the information being collected, (b) the source of the information, (c) name and address of the responsible party, (d) the purpose for which the information is being collected, (e) if the supply of information is voluntary or mandatory, (f) the consequences of failing to provide the information, (g) any law authoring the collection, (h) whether the responsible party intends transferring the information to another country and the level of protection to be afforded to it. This is not necessary if consent has been given for non-compliance or if compliance is not reasonably practicable in the particular circumstances.
- 10.2.7 Security Safeguards: A responsible party must secure the integrity and confidentiality of Personal Information in its possession or under its control by taking appropriate and reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of Personal Information and unlawful access to or processing of Personal Information. The responsible party must have due regard to generally accepted information security practices and procedures which may apply to it generally or be required in terms of specific industry or professional rules and regulations. Where there are reasonable grounds to believe that Personal Information of a data subject was accessed/acquired by an unauthorised person, the responsible party must notify the Regulator and the data subject.
- 10.2.8 Data Subject Participation: As regards its Personal Information, a data subject may, request a responsible party by completing and submitting APPENDIX 3 to (a) correct or delete inaccurate, irrelevant, excessive, out-dated, incomplete, misleading or unlawfully obtained information in its possession/under its control, and (b) destroy or delete a record of information that the responsible party is no longer authorised in law to retain.
- 10.3 In the course of their respective business and operations the members of the Group (as responsible parties in terms of POPI) Process Personal Information of and relating to the Group's (a) clients and their customers, (b) suppliers, (c) service providers and their customers, (d) professional advisers, (e) personnel (including employees, contractors and officers) and their family members and relatives, (f) non-executive officers and their family members and relatives, and (g) shareholders and their ultimate beneficial owners.

- 10.4 The exact nature of a data subject's Personal Information which is Processed by members of the Group will depend on the relationship (which may be direct or indirect) between the member of the Group and the data subject and the rights and obligations of the member of the Group in relation to or associated with the data subject. For a general overview of the Personal Information Processed by members of the Group in respect of various data subjects, see APPENDIX 4.

## **11 PRESCRIBED FEES IN TERMS OF SECTION 54(1)**

- 11.1 In terms of section 54(1) of the Act the head of a private body (or by implication the IO) is not obliged to process a request until the prescribed request fee (currently R50.00) has been paid. Unless and until the fee or any deposit that the Requester is required to pay in terms of the Act, and all other procedural requirements have been complied with the 30 day period allowed for the IO to consider, the request shall not commence.
- 11.2 A schedule of the prescribed fees can be obtained by viewing regulation R187 on the Human Rights Commission's website at [www.sahrc.org.za](http://www.sahrc.org.za). As at the date of publication of this manual, the fees are as set out in APPENDIX 5.

## **12 COPIES OF THIS MANUAL**

- 12.1 Copies of this manual are obtainable in hard copy from the premises of the Company, and in electronic format by return email addressed to [willem.deswardt@adumoonline.com](mailto:willem.deswardt@adumoonline.com). The following reference must be inserted in the subject line of the email 'Request for PAIA Manual'.
- 12.2 This manual will be published as required by the Act.

## PAIA FORM C

## 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		
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><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></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center"><b>TYPE OF RECORD</b></p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>			
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			

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
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	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>  <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

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

FEES	
a)	<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 (Please specify)

Signed at \_\_\_\_\_ 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**

## POPI FORM 1

**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, 2018**  
 [Regulation 2]

*Note:*

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

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject: Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	Code (    )
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):	Code (    )
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

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

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

## POPI FORM 2

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
[Regulation 3]

*Note:*

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

Mark the appropriate box with an "x".

**Request for:**
☐

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

☐

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

<b>A</b>	<b>DETAILS OF THE DATA SUBJECT</b>
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	

Fax number/ E-mail address:	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTRUCTED/ DESTROYED</b>
<b>D</b>	<b>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</b> <b>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.</b> <i>(Please provide detailed reasons for the request)</i>

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

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

## PERSONAL INFORMATION PROCESSED

DATA SUBJECTS	PERSONAL INFORMATION	SPECIAL PERSONAL INFORMATION
clients and their customers	<ul style="list-style-type: none"> <li>· information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language or birth;</li> <li>· information relating to education, medical, financial, criminal or employment history;</li> <li>· identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment;</li> <li>· biometric information;</li> <li>· personal opinions, views or preferences;</li> <li>· correspondence sent that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>· views and opinions of other individuals about the person;</li> <li>· 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</li> </ul>	<ul style="list-style-type: none"> <li>· religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information (personal identification based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition);</li> <li>· criminal behaviour subject to the extent that it relates to (i) the alleged commission of any offence, or (ii) any proceedings in respect of any offence allegedly committed or the disposal of such proceedings</li> </ul>

suppliers	<ul style="list-style-type: none"> <li>· information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language or birth;</li> <li>· information relating to education, medical, financial, criminal or employment history;</li> <li>· identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment;</li> <li>· biometric information;</li> <li>· personal opinions, views or preferences;</li> <li>· correspondence sent that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>· views and opinions of other individuals about the person;</li> <li>· 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</li> </ul>	<ul style="list-style-type: none"> <li>· religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information (personal identification based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition);</li> <li>· criminal behaviour subject to the extent that it relates to (i) the alleged commission of any offence, or (ii) any proceedings in respect of any offence allegedly committed or the disposal of such proceedings</li> </ul>
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<p>service providers and their customers</p>	<ul style="list-style-type: none"> <li>· information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language or birth;</li> <li>· information relating to education, medical, financial, criminal or employment history;</li> <li>· identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment;</li> <li>· biometric information;</li> <li>· personal opinions, views or preferences;</li> <li>· correspondence sent that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>· views and opinions of other individuals about the person;</li> <li>· 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</li> </ul>	<ul style="list-style-type: none"> <li>· religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information (personal identification based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition);</li> <li>· criminal behaviour subject to the extent that it relates to (i) the alleged commission of any offence, or (ii) any proceedings in respect of any offence allegedly committed or the disposal of such proceedings</li> </ul>
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professional advisers	<ul style="list-style-type: none"> <li>· information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language or birth;</li> <li>· information relating to education, medical, financial, criminal or employment history;</li> <li>· identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment;</li> <li>· biometric information;</li> <li>· personal opinions, views or preferences;</li> <li>· correspondence sent that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>· views and opinions of other individuals about the person;</li> <li>· 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</li> </ul>	<ul style="list-style-type: none"> <li>· religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information (personal identification based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition);</li> <li>· criminal behaviour subject to the extent that it relates to (i) the alleged commission of any offence, or (ii) any proceedings in respect of any offence allegedly committed or the disposal of such proceedings</li> </ul>
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<p>personnel (including employees, contractors and officers) and their family members and relatives</p>	<ul style="list-style-type: none"> <li>· information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language or birth;</li> <li>· information relating to education, medical, financial, criminal or employment history;</li> <li>· identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment;</li> <li>· biometric information;</li> <li>· personal opinions, views or preferences;</li> <li>· correspondence sent that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>· views and opinions of other individuals about the person;</li> <li>· 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</li> </ul>	<ul style="list-style-type: none"> <li>· religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information (personal identification based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition);</li> <li>· criminal behaviour subject to the extent that it relates to (i) the alleged commission of any offence, or (ii) any proceedings in respect of any offence allegedly committed or the disposal of such proceedings</li> </ul>
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<p>non-executive officers and their family members and relatives</p>	<ul style="list-style-type: none"> <li>· information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language or birth;</li> <li>· information relating to education, medical, financial, criminal or employment history;</li> <li>· identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment;</li> <li>· biometric information;</li> <li>· personal opinions, views or preferences;</li> <li>· correspondence sent that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>· views and opinions of other individuals about the person;</li> <li>· 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</li> </ul>	<ul style="list-style-type: none"> <li>· religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information (personal identification based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition);</li> <li>· criminal behaviour subject to the extent that it relates to (i) the alleged commission of any offence, or (ii) any proceedings in respect of any offence allegedly committed or the disposal of such proceedings</li> </ul>
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shareholders and their ultimate beneficial owners	<ul style="list-style-type: none"> <li>· information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language or birth;</li> <li>· information relating to education, medical, financial, criminal or employment history;</li> <li>· identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment;</li> <li>· biometric information;</li> <li>· personal opinions, views or preferences;</li> <li>· correspondence sent that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>· views and opinions of other individuals about the person;</li> <li>· 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</li> </ul>	<ul style="list-style-type: none"> <li>· religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information (personal identification based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition);</li> <li>· criminal behaviour subject to the extent that it relates to (i) the alleged commission of any offence, or (ii) any proceedings in respect of any offence allegedly committed or the disposal of such proceedings</li> </ul>
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## APPENDIX 5

### FEES

#### FEES

All prices listed below are exclusive of value added tax as set out in the Value Added Tax Act, No. 89 of 1991, which will be charged, in addition, at the then legislated rate.

#### SECTION 54(7) OF THE ACT

**Request fee.** The request fee payable by a requester, other than a personal requester (i.e., a person seeking access to records that contain their personal information), is R140.00.

**Access and reproduction fees.** The request fees payable by a requester are –

- For every photocopied/printed (black and white) A4-size page or part thereof R 2.00
- For a copy in a computer-readable form on flash drive (requestor to provide flash drive) R40.00
- For a copy in a computer-readable form on CD (requestor to provide CD) R40.00
- For a copy in a computer-readable form on CD (Company to provide CD) R60.00
- For transcription of visual images, for an A4-size page or part thereof (outsourced)  
Per outsourcer quote
- For a copy of visual images (outsourced)  
Per outsourcer quote

- For a transcription of an audio record, for an A4-size page or part thereof R24.00
- For a copy of an audio record on flash drive (requestor to provide flash drive) R40.00
- For a copy of an audio record on flash drive (requestor to provide CD) R40.00
- For a copy of an audio record on flash drive (Company to provide CD) R60.00

Search and preparation fee. No charge for the first hour. The request fees payable by a requester are R145.00 for each subsequent hour or part of an hour reasonably required for search and preparation up to a capped maximum of R435.00.

Deposit. A deposit is payable upfront by a requestor if the search and preparation will exceed 6 hours. The deposit will be one third of the calculated access and reproduction fee.

Expenses. The actual expenses incurred by the Company are payable by a requestor when a copy of a record must be posted, e-mailed or electronically transferred to a requester.