

# Ndawonye Investment Holding (Pty) Ltd.

REGISTRATION NUMBER: 2010/012747/07



PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 of 2000  
PROTECTION OF PERSONAL INFORMATION ACT NO. 4 OF 2013

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## FOREWORD

### **MANUAL OF Ndawonye Investment Holding (Pty) Ltd.**

**Registration Number : 2010/012747/07**

Prepared in accordance with Section 51 of the Promotion of Access to Information Act. No. 2 of 2000 and updated in accordance with the provisions of the Protection of Personal Information Act No. 4 of 2013.

## **INTRODUCTION**

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On 9 March 2001, the Promotion of Access to Information Act. No. 2 of 2000 (“PAIA”) became operative, giving effect to the section 32(2) Constitutional right of access to information.

One of the main requirements specified in PAIA, is the compilation of an information manual that provides information on both the types and categories of records held by a private body.

This document serves as the company’s information manual and provides reference to the records held by the company and the process to request access to such records.

In addition, this document serves as the manual which explains how to access, object to processing, or request correction of personal information held by the company, in terms of the Protection of Personal Information Act No. 4 of 2013 (“POPIA”).

## **SCOPE OF THE MANUAL**

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Nature of Business:

Ndawonye Investment Holdings (Pty) Ltd is a property investment company, with its main asset being a property situated in 22 Wellington Road, Parktown, Johannesburg.

Ndawonye Investment Holdings (Pty) Ltd.’s mission is investment in immovable property as principle. The main purpose of the entity is to establish a long-term property investment for the future office premises of the Johannesburg office of BDO South Africa.

The scope of the manual is limited to the records held by Ndawonye Investment Holding (Pty) Ltd.

## AVAILABILITY OF THE MANUAL

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A copy of this manual is available to the public for inspection on the Company's website at [www.bdo.co.za](http://www.bdo.co.za) or on request from the designated contact person referred to in this manual.

## CONTACT PERSON

### CONTACT DETAILS

**Head of Business:** Mark Stewart  
**Contact Number:** 011 488 1700  
**Email:** mstewart@bdo.co.za

The responsibility for administration of, and compliance with PAIA and POPIA has been delegated to the Information Officer. Requests pursuant to the provisions of PAIA and POPIA should be directed as follows:

<b>Contact person</b>	Mark Stewart
<b>Postal Address</b>	PO Box Private Bad X60500, Houghton, 2041
<b>Physical Address</b>	Wanderers Office Park, 52 Corlett Drive, Illovo, Johannesburg, 2196
<b>Phone number</b>	011 488 1700
<b>E-mail</b>	mstewart@bdo.co.za

## HRC GUIDE

### GUIDE FOR REQUESTERS ON HOW TO USE PAIA AND POPIA

A Guide has been compiled in terms of Section 10 of PAIA by the Human Rights Commission. It contains information to assist a person wishing to exercise a right, in terms of the PAIA or POPIA. The Guide is available for inspection, inter alia, as follows:

Kindly direct queries to

**Postal Address:** PO Box 31533  
Braamfontein,  
Johannesburg, 2017

The Information Regulator

**Phone number:** 010 023 5200

Braampark Forum 3, 33 Hoofd Street  
Braamfontein

**E-mail:**

[infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

Website

:

<https://www.justice.gov.za/infoereg/index.html>

## AUTOMATIC DISCLOSURE

Brochures,  
Pricelists,  
Pamphlets

## LEGISLATIVE RECORDS

### RECORDS HELD IN ACCORDANCE WITH LEGISLATION

Records are held in accordance with the following legislation:

- \* Basic Conditions of Employment Act, 1997
- \* Broad Based Black Economic Empowerment Act, 2003
- \* Companies Act 1973
- \* Companies Act 2008 (Act No. 71 of 2008)
- \* Compensation for Occupational Injuries and Diseases Act, 1993
- \* Employment Equity Act, 1998
- \* Finance Act, 2007
- \* Income Tax Act, 1962
- \* Labour Relations Act, 1995
- \* Occupational Health and Safety Act, 1993
- \* Pension Funds Act, 1956 (Act No. 24 of 1956)
- \* Promotion of Access to Information Act, 2000
- \* Skills Development Act, 1998
- \* Skills Development Levies Act, 1999
- \* Unemployment Insurance Act, 2001
- \* Unemployment Insurance Contributions Act, 2002
- \* Value-Added Tax Act, 1991

## CATEGORIES AND PROCESSING OF RECORDS

CATEGORY OF DATA SUBJECT	TYPE OF PERSONAL INFORMATION	PURPOSE OF PROCESSING	RECIPIENTS OF PERSONAL INFORMATION
Tenants	Name, ID or registration number, tenant address, tenant financial information, contracts, tenant third party information (CIPC information), shareholder and director names, ID numbers and addresses.	To carry out obligations under and give effect to the terms of the lease agreement.  To comply with legal, risk and compliance requirements.  To communicate with the tenant.	Service providers or operators who provide software or systems to process the personal information. This includes cloud service providers and cloud storage.  To government agencies or professional bodies where we are required to disclose under a legal obligation.
Shareholders and directors	Name, ID number and address.	To maintain share registers and CIPC records.	To government agencies or professional bodies where we are required to disclose under a legal obligation.

## TRANSBORDER FLOWS OF PERSONAL INFORMATION

Where it is necessary, for the purposes of processing, to transfer personal information outside of South Africa, we will only do so in accordance with the provisions of POPIA.

We anticipate that personal information may be transferred outside of South Africa for purposes of cloud storage, and where we do so, we will ensure that the necessary safeguards are in place to protect personal information.

## SECURITY OF PERSONAL INFORMATION

The company takes appropriate and reasonable technical and organisational measures to protect personal information which it processes, so as to prevent:

- a) The loss of, damage to, or unauthorised destruction of personal information;
- b) The unlawful access to or processing of personal information.

For further information, please see our [Privacy Statement](#)

## ACCESS REQUESTS

### ACCESS REQUEST PROCEDURE

*It is important to note that the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. An application to access to a record is subject to certain limitations if the requested record falls within a certain category as specified with Part 3 and Chapter 4 of PAIA.*

### COMPLETION OF ACCESS REQUEST FORM

In order to facilitate a timely response to requests for access, all requesters should take note of the following when completing the Access Request Form:

- \* The Access Request Form must be completed
  - \* Proof of identity is required to authenticate the identity of the requester. Therefore, in addition to the access form, requestors will be required to supply a copy of their identification document.
  - \* Complete the form in BLOCK LETTERS and answer every question.
  - \* If a question does not apply state N/A in response to that question
  - \* If there is nothing to disclose in reply to a particular question state “nil” in response to that question.
- If there is insufficient space on a printed form, additional information may be provided on an attached folio
- \* When the use of an attached folio is required, precede each answer with the applicable title.

## ACCESS REQUESTS

### ACCESS REQUEST PROCEDURE

#### SUBMISSION OF ACCESS REQUEST FORM

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The complete Access Request Form together with a copy of the identity document must be submitted either via post, e-mail or fax and must be addressed to the contact person as indicated above.

This fee is not applicable to personal requesters referring to any person seeking to access records that contain their personal information

An initial, request fee of R57.00 (including VAT) is payable on submission

#### PAYMENT OF FEES

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Payment details can be obtained from the contact person as indicated above and can be made either via a direct deposit, by bank guaranteed cheque or by postal order. Proof of payment must be supplied The access fee must be paid prior to access being given to the requested record.

If the request for access is successful an access fee may be required for the search, reproduction and/or preparation of the record(s) and will be calculated based on the Prescribed Fees.

If a deposit has been paid in respect of a request for access which is refused then the information officer must refund the deposit to the requestor

#### NOTIFICATION

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The company will within 30 days of receipt of the request decide whether to grant or decline the request and give notice with reasons to that effect.

The 30 day period within which the company has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty days, if the request is for a large volume of information and the information cannot be reasonably obtained within the original 30 day period. The company will notify the requester in writing should an extension be sought.

DS  
MS



## GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

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The main grounds for refusal of a request for information are:

- Mandatory protection of the privacy of a third party who is natural person, which would involve the unreasonable disclosure of personal information of that natural person.
- Mandatory protection of the commercial information of a third party, if the record contains
  - Trade secrets of that party
  - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that party
  - Information disclosed in confidence by a third party to the company if the disclosure could put that third party to a disadvantage in negotiations or 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 which could be regarded as privileged in legal proceedings.
- The Commercial Activities of the company which may include:
  - Trade secrets of the company
  - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the company.

## REQUESTS FOR CORRECTION AND DELETION

### REQUESTS FOR CORRECTION AND DELETION PROCEDURE

*It is important to note that the successful completion and submission of a Request for Correction or Deletion Form does not automatically allow the requester to correct or delete personal information or destroy or delete a record. An application to correct or delete personal information is subject to the provisions of section 23 and regulation 3 of POPIA.*

### COMPLETION OF REQUESTS FOR CORRECTION AND DELETION FORM

In order to facilitate a timely response to requests for correction and deletion, all requesters should take note of the following when completing the Request for Correction or Deletion Form:

- \* The Request for Correction or Deletion Form must be completed
- \* Proof of identity is required to authenticate the identity of the requester. Therefore, in addition to the Request for Correction or Deletion Form, requestors will be required to supply a copy of their identification document.
- \* Complete the form in BLOCK LETTERS and answer every question.
- \* If a question does not apply state N/A in response to that question
- \* If there is nothing to disclose in reply to a particular question state “nil” in response to that question.
- \* If there is insufficient space on a printed form, additional information may be provided on an attached folio
- \* When the use of an attached folio is required, precede each answer with the applicable title.

### SUBMISSION OF REQUESTS FOR CORRECTION AND DELETION

The complete Request for Correction or Deletion Form together with a copy of the identity document must be submitted either via post, e-mail or fax and must be addressed to the contact person as indicated above.



## REQUESTS FOR CORRECTION AND DELETION

### REQUESTS FOR CORRECTION AND DELETION PROCEDURE

#### NOTIFICATION

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The company will as soon as reasonably practicable:

- correct the information;
- destroy or delete the information;
- provide credible evidence in support of the information or
- take reasonable steps, in the circumstances, to attach to the personal information, an indication that a correction of the information was requested but has not been made, in such a manner that it will always be read with the information.

The company will provide notification of the action taken as a result of the Request for Correction or Deletion Form.

#### GROUND FOR REFUSAL TO CORRECT OR DELETE PERSONAL INFORMATION

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The main grounds for refusal of a to correct or delete information are:

- Credible evidence in support of the personal information held;

- The Information is being retained in terms of applicable legislation and/or the company's Record Retention and Destruction Policy; or
- The Personal Information is necessary to carry out our mandate or in terms of applicable legislation.

#### PAYMENT OF FEES

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No fees are payable in respect of requests for correction or deletion of personal information.

## OBJECTION TO PROCESSING

### OBJECTION TO PROCESSING PERSONAL INFORMATION PROCEDURE

*It is important to note that the successful completion and submission of an Objection to the Processing of Personal Information Form does not automatically prohibit the Company from processing the personal information. An application to object to the processing of personal information is subject to and must comply with the provisions of section 11(3) and regulation 2 of POPIA.*

### COMPLETION OF OBJECTION FORM

In order to facilitate a timely response to objections to processing personal information, all requesters should take note of the following when completing the Objection Form:

- \* The Objection Form must be completed
- \* Proof of identity is required to authenticate the identity of the requester. Therefore, in addition to the objection form, requestors will be required to supply a copy of their identification document.
- \* Complete the form in BLOCK LETTERS and answer every question.
- \* If a question does not apply state N/A in response to that question
- \* If there is nothing to disclose in reply to a particular question state "nil" in response to that question.
- \* If there is insufficient space on a printed form, additional information may be provided on an attached folio
- \* When the use of an attached folio is required, precede each answer with the applicable title.

### SUBMISSION OF OBJECTION FORM

The complete Objection Form together with a copy of the identity document must be submitted either via post, e-mail or fax and must be addressed to the contact person as indicated above.

**OBJECTION TO PROCESSING**

OBJECTION TO PROCESSING PERSONAL INFORMATION PROCEDURE

**DISCONTINUATION OF PROCESSING PERSONAL INFORMATION**

The company will upon receipt of the Objection Form discontinue processing the personal information if the provisions of section 11(3) and regulation 2 of POPIA are met.

**GROUND(S) FOR REFUSAL**

The main grounds for refusal to discontinue processing personal information:

- No reasonable grounds exist to discontinue processing the personal information;

- The information is being processed in terms of applicable legislation; or
- The objection is not in respect of information being processed in terms of section 11(d) to (f) of POPIA.

**PAYMENT OF FEES**

No fees are payable in respect of objections to processing personal information.

SIGNED AT JOHANNESBURG ON THIS DAY THE 23<sup>RD</sup> OF JUNE 2021

FULL NAMES: MARK STEWART

CAPACITY/DESIGNATION: INFORMATION OFFICER

SIGNATURE.....  
 DocuSigned by:  
 Mark Stewart  
 6040405ABECF4DD2.....

FORMS

ACCESS REQUEST FORM

(Section 53(1) of the Promotion of Access of Information Act, 2000 (Act No 2 of 2000) [Regulation 10]

Particulars of Private Body

Requests can be submitted either via post, e-mail or fax and should be addressed to the relevant contact person as indicated below:

Contact person: Mark Stewart
Postal Address: PO Box Private Bad X60500, Houghton, 2041
Physical Address: Wanderers Office Park, 52 Corlett Drive, Illovo, Johannesburg, 2196
Phone number: 011 488 1700
E-mail: mstewart@bdo.co.za

Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below
(b) The address and/or fax number in the Republic to which the information is to be sent must be given
(c) Proof of capacity in which request is made, if applicable, must be attached.

Full names and surname :

Identity number :
Postal address :
Fax number :
Telephone number :
E-mail address :

Capacity in which request is made, when made on behalf of another person:



**Particulars of person requesting access to the record (if a legal entity)**

- (a) *The particulars of the entity who requests access to the record must be given below*
- (b) *The address and/or fax number in the Republic to which the information is to be sent must be given*
- (c) *Proof of capacity in which request is made, if applicable, must be attached.*

**Name of entity** :

**Registration number** :

**Postal address** :

**Fax number** :

**Telephone number** :

**E-mail address** :

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**Particulars of person on whose behalf request is made**

This section must ONLY be completed if a request for information is made on behalf of another person

**Full names and surname:**

**Identity number:**

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**Particulars of record**

- (a) *Provide full particulars of the record to which access is requested, including the reference number if it is known to you, to enable the record to be requested*
- (b) *If the provide space is inadequate, please use a separate folio and attach it to this form. Please sign additional folios.*

**Description of record of relevant part of the record:**

**Reference number (if available):**

**Any further particulars of record:**

**FEES**

- (a) *A request for access to a record, other than a record containing personal information about yourself will be processed only after a request fee has been paid*
- (b) *You will be notified of the amount to be paid as the request fee*
- (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 for exemption of payment of fees:****FORM OF ACCESS TO RECORD**

Form in which record is required

Mark the appropriate box with an X

**NOTES**

- (a) *Compliance with your request in the specified form may depend on the form in which the record is available*
- (b) *Access in the form requested may be refused under certain circumstances. In such a case you will be informed whether access will be granted in another form.*
- (c) *The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.*

1. If the record is in written or printed form

 Copy of record       Inspection of record

2. If record consists of visual images

 View the images       Copy of the images       Transcription of the images

3. If the record consists of recorded information that can be reproduced in sound:

 Listen to the soundtrack (audio)       Transcription of soundtrack

4. If the record is held on computer or in an electronic or machine-readable form (this includes photographs, slides, video recordings, computer generated images, sketches etc.)

 Printed copy of record       Printed copy of information derived from the record       Copy in computer readable form

If you requested a copy or transcription of a record (above) do you wish the copy of transcription to be posted to you? Postage is payable

Yes

No



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.

In which language would you prefer the record:

**In the event of a disability**

*If you are prevented by a disability from reading, viewing or listening to the record in the form of access provided for in 1 to 4 above, state your disability and indicate in the form in which the record is required*

**Disability:**

**Form in which record is required:**

\_\_\_\_\_

**PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**

*If the space provided is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all folios*

1. **Indicate the right to be exercised or protected:**
  
2. **Explain why the record requested is required for the exercise or protection of the aforementioned right:**

**NOTICE OF DECISION REGARDING REQUEST FOR ACCESS**

*You will be notified in writing whether your request has been approved or denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.*

**How would you prefer to be informed of the decision regarding your request for access to the record?**

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

SIGNATURE OF REQUESTER/PERSON ON  
WHOSE BEHALF REQUEST IS MADE

<sup>DS</sup>  
MS

YOU MUST	SEND WITH THIS APPLICATION
1. Complete all necessary spaces	1. The request fee (if not personal requester)
2. Sign the access request form	2. Any additional folios completed
3. Sign additional folios completed	3. Copy of Identity Document

**FEES**

PRESCRIBED FEES

(Section 54(7) of the Promotion of Access to Information Act, 2000 (Act No.2 of 2000)  
[Fees for record of Private Body]

**PLEASE NOTE THAT ALL PRICES LISTED BELOW ARE INCLUSIVE OF VALUE ADDED TAX**

(a)	For every photocopy of an A4 size page or part thereof	R	1.10
(b)	For every printed copy of an A4 size page or part thereof held on computer or in an electronic or machine readable form	R	0.75
(c)	For a copy in a computer-readable form on		
	(i) compact disc	R	70.00
(d)	(i) For a transcription of visual images, for an A4 size page or part thereof	R	40.00
	(ii) For a copy of visual images	R	60.00
(e)	(i) For a transcription of an audio record, for an A4 size page or part thereof	R	20.00
	(ii) For a copy of audio record	R	30.00

To search for and prepare the record for disclosure – R50.00 for each hour or part thereof reasonably required for such search and preparation

(f)

(Section 54(2) of the Promotion of Access to Information Act, 2000 (Act No.2 of 2000)  
[Regulation 11(3)]

**PLEASE NOTE THAT ALL PRICES LISTED ABOVE ARE INCLUSIVE OF VALUE ADDED TAX**

- (a) Six hours as the hours to be exceeded before a deposit is payable; and
- (b) One third of the access fee is payable as a deposit by the requester

(Section 54(7) of the Promotion of Access to Information Act, 2000 (Act No.2 of 2000)  
[Regulation 11(3)]

**PLEASE NOTE THAT ALL PRICES LISTED ABOVE ARE INCLUSIVE OF VALUE ADDED TAX**

The actual postage fee is payable when a copy of a record must be posted to a requester

**FORMS**

**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.

A	DETAILS OF THE DATA SUBJECT
Name(s) and registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number/E-mail address:	
	Code (    )
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and registered name of responsible party:	Ndawonye Investment Holdings (Pty) Ltd
Residential, postal or business address:	PO Box Private Bad X60500, Houghton
Contact number(s):	011 488 1700
Fax number/ E-mail address:	mstewart@bdo.co.za

<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ 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 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 RETAN. (Please provide detailed reasons for the request)</b>

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

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

**YOU MUST**

1. Complete all necessary spaces
2. Sign the access request form
3. Sign additional folios completed

**SEND WITH THIS APPLICATION**

1. Copy of Identity Document
2. Any additional folios completed

## FORMS

**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 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.*

A	DETAILS OF THE DATA SUBJECT
Name(s) and registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and registered name of responsible party:	Ndawonye Investment Holdings (Pty) Ltd
Residential, postal or business address:	PO Box Private Bad X60500, Houghton
	Code (    )
Contact number(s):	011 488 1700
Fax number/ E-mail address:	mstewart@bdo.co.za

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

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

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

**YOU MUST**

- 1. Complete all necessary spaces
- 2. Sign the access request form
- 3. Sign additional folios completed

**SEND WITH THIS APPLICATION**

- 1. Copy of Identity Document
- 2. Any additional folios completed

