

BDO SOUTH AFRICA



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

Date:

03 December 2025

Name and Designation:

Bonga Mokoena
CEO - BDO South Africa

Signature:

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1 DEFINITIONS, ACRONYMS AND ABBREVIATIONS

1.1 Terms and expressions used in this document shall have the same meanings associated to them as defined in this clause one, and where not defined unless the context clearly provides otherwise, shall have the respective meanings assigned to them as set out in POPIA and PAIA.

1.1.1 “Company” BDO South Africa Incorporated (Registration Number: 1995/002310/21) and including all its related or interrelated group companies, affiliates and subsidiaries. This manual accordingly applies to:

Name	Registration Number
Azuraworx (Pty) Ltd	2009/022874/07
BDO Advisory Services (Pty) Ltd	2010/015322/07
BDO Business Restructuring (Pty) Ltd	2002/025164/07
BDO Business Services (Pty) Ltd	2011/106089/07
BDO Cape Advisory (Pty) Ltd	2010/016246/07
BDO Cape Incorporated	2010/016204/21
BDO Celerity Investments (Pty) Ltd	2016/382563/07
BDO Corporate Finance (Pty) Ltd	1983/002903/07
BDO Credit Solutions (Pty) Ltd	2023/129151/07
BDO Employee Benefits (Pty) Ltd	2001/015057/07
BDO Healthcare (Pty) Ltd	2006/035201/07
BDO PS Advisory (Pty) Ltd	2000/011066/07
BDO South Africa Services (Pty) Ltd	2011/106088/07
BDO Tax Services (Pty) Ltd	2006/006127/07
BDO Verification Services (Pty) Ltd	2005/040276/07
BDO Wave (Pty) Ltd	2024/744480/07
BDO Wealth Advisors (Pty) Ltd	1966/005541/07
Ndawonye Investment Holdings (Pty) Ltd	2010/012747/07
Pilot Building D Property Investments (Pty) Ltd	2012/012808/07
Solutio Investment Holdings (Pty) Ltd	2016/410950/07
Statucor (Pty) Ltd	1989/005394/07

- 1.2 "Head of Business" means as defined in POPIA and PAIA which includes the Chief Executive Officer (CEO), Managing Director (MD) or officer of similar designation from time to time and whose particulars are stated on page 6 of this PAIA manual.
- 1.3 " Information Officer" Information Officer designated by the Head of Business of the Company in terms of PAIA and POPIA.
- 1.4 "PAIA" Promotion of Access to Information Act No. 2 of 2000 inclusive of any amendments and regulations thereto from time to time;
- 1.5 "PAIA Manual" Means this Manual of the Company prepared in terms of section 51 of PAIA and as may be amended from time to time;
- 1.6 "POPIA" Protection of Personal Information Act No. 4 of 2013 inclusive of any amendments and regulations thereto from time to time; and
- 1.7 "Regulator" Information Regulator South Africa.

2 PURPOSE OF MANUAL

This PAIA Manual is useful for the public to:

- 2.1 See the categories of records held by the body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3 CONTACT PARTICULARS

Company Website Address:	www.bdo.co.za
Telephone Number:	+27 011 488 1700
Email Address:	dataprivacy@bdo.co.za
S.A. Head Office Physical Address:	Wanderers Office Park, 52 Corlett Drive, Illovo, Johannesburg, 2196
S.A. Head Office Postal Address:	PO Box Private Bad X60500, Houghton, 2041

Details:	Information Officer
Name:	Bonga Mokoena
Telephone Number:	011 488 1700
E-mail Address:	bmokoena@bdo.co.za

- 4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.2.1 The aforesaid Guide contains the description of the objects of PAIA and POPIA, the postal and street address, phone and fax number and, if available, electronic mail address of-
- 4.2.1.1 the Information Officer of every public body, and
- 4.2.1.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- 4.2.2 the assistance available from the information officer of a public body in terms of PAIA and POPIA;
- 4.2.3 the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.2.4 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
- 4.2.4.1 an internal appeal;
- 4.2.4.2 a complaint to the Regulator; and
- 4.2.4.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.2.5 the provisions of sections 14[5] and 51[8] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.2.6 the provisions of sections 15[1] and 52[2] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.2.7 the notices issued in terms of sections 22[1] and 54[2] regarding fees to be paid in relation to requests for access; and
- 4.2.8 the regulations made in terms of section 92[11].
- 4.3 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

- 4.4 The Guide can also be obtained-
- 4.4.1 upon request to the Information Officer;
 - 4.4.2 from the website of the Regulator <https://inforegulator.org.za> or <https://inforegulator.org.za/paia-guidelines/>
- 4.5 A copy of the Guide is also available in English at the Company’s principal office and regional offices together with a copy of this PAIA Manual and relevant forms described in 5 below, for public inspection during normal office hours.
- 4.6 The contact details of the Information Regulator are:

Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Physical Address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg. 2191
Website:	www.inforegulator.org.za
General Enquiries Email:	enquiries@inforegulator.org.za
Complaints Email:	PAIAComplaints@inforegulator.org.za
Complaints Form 5:	Complaints Form [Regulation 10]

- 4.7 Information which is not readily available as indicated in this manual, may be requested in accordance with the procedure prescribed in terms of PAIA and as set out below.
- 4.8 A person who wants access to the Company’s records that are not readily available must complete the necessary request forms that is available at the offices of Company at request to the Information Officer, or which forms may be accessed and downloaded on <https://inforegulator.org.za/paia-forms/>. The completed request form must be sent to the address or email address provided in this manual and marked for the attention of the Information Officer. For the purpose of clarity, the following forms are accessible through the aforesaid website link and may be used for the purpose of requesting information from the Company as may be applicable:
- Form 01: [Request for a Copy of the Guide from a Information Officer](#) [Regulation 3]
 - Form 02: [Request for Access to Record](#) [Regulation 7]
 - Form 03: [Outcome of request and of fees payable](#) [Regulation 8]
 - Form 04: [Internal Appeal Form](#) [Public Bodies only, Regulation 9]

It shall remain the responsibility of the person completing the forms to verify and use the latest published versions of the applicable forms as published by the Information Regulator on their website from time to time.

- 4.9 When completing the forms set out above, please provide sufficient details to enable the Company to identify:
- 4.9.1 The record(s) requested;
 - 4.9.2 The requester (and if an agent is lodging the request, proof of capacity);
 - 4.9.3 The form of access required;
 - 4.9.4 The postal address or fax number of the requester in the Republic;
 - 4.9.5 If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof; and
 - 4.9.6 The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
- 4.10 Requests for information must be made in accordance with the prescribed PAIA procedures and at the rates provided in terms of Regulations 6 and 7 of PAIA.
- 4.11 Information of the Company listed in this manual does not mean that the information will be made available to a person requesting it. The Company retains its rights to refuse a request for information should any of the grounds of refusal as set out in Chapter 4 of PAIA exist. Requests for access will be evaluated on a case-by-case basis in accordance with PAIA.

5 INFORMATION AUTOMATICALLY OR PUBLICLY AVAILABLE

The following published information is readily available to the public and may be obtained from the Company without a person having to request access:

- 5.1 Newsletters;
- 5.2 Pamphlets \ Brochures;
- 5.3 Posters;
- 5.4 Pricelists;
- 5.5 Marketing and Promotional Material;
- 5.6 Information and documents set out on the Company's website described in the contact particulars section of this manual.

6 INFORMATION AVAILABLE IN TERMS OF OTHER APPLICABLE LEGISLATION

The Company retains and processes information and records required of in terms of local and, if applicable, international legislation, statutory laws and regulations where applicable to the Company, which may include but is not limited to records pertaining to the following legislation:

- Auditing Profession Act No. 26 of 2005, as amended
- Basic Conditions of Employment Act 75 of 1997, as amended
- Broad-based Black Economic Empowerment Act 53 of 2003, as amended
- Companies Act 71 of 2008, as amended
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993, as amended
- Competition Act 89 of 1998, as amended
- Constitution of the Republic of South Africa Act 108 of 1996
- Consumer Protection Act 68 of 2008, as amended
- Copyright Act 98 of 1978, as amended
- Electronic Communications Act 36 of 2005, as amended
- Electronic Communications and Transactions Act, 25 of 2002, as amended
- Employment Equity Act 55 of 1998, as amended
- Employment Services Act 4 of 2014, as amended
- Employment Tax Incentive Act 26 of 2013, as amended
- Financial Intelligence Centre Act 38 of 2001, as amended
- Income Tax Act 58 of 1962, as amended
- Independent Communications Authority of SA Act 13 of 2000 (ICASA), as amended
- Intellectual Property Laws Amendment Act 28 of 2013, as amended
- Insurance Act, 18 of 2017, as amended
- Occupational Health and Safety Act 85 of 1993, as amended
- Labour Relations Act 66 of 1995, as amended
- Long-term Insurance Act 52 of 1998, as amended
- National Credit Act 34 of 2005, as amended
- National Environmental Management Act 107 of 1998, as amended
- Patents Act 57 of 1978, as amended
- Pension Funds Act 24 of 1956, as amended
- Prevention and Combatting of Corrupt Activities Act 12 of 2004, as amended
- Prevention of Organized Crime Act No. 121 of 1998, as amended
- Promotion of Access to Information Act, No. 2 of 2000, as amended
- Promotion of Equality and Prevention of Unfair Discrimination Act, No. 4 of 2000, as amended
- Protected Disclosures Act, No. 26 of 2000, as amended
- Protection of Personal Information Act 4 of 2013, as amended
- Skills Development Levies Act 9 of 1999, as amended
- Skills Development Act 97 of 1998, as amended
- South African Reserve Bank Act, No. 90 of 1989, as amended
- South African Revenue Services Act 34 of 1997, as amended

- Tax Administration Act 28 of 2011, as amended
- Unemployment Insurance Act 63 of 2001, as amended
- Unemployment Insurance Contributions Act 4 of 2002, as amended
- Value Added Tax Act 89 of 1991, as amended

7 DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS

The Company retains and processes various categories of records and information relevant to the function of its business, administration, infrastructure, and legal persona, which may include but is not limited to the following categories:

Administration and Statutory Records

- Attendance registers
- Correspondence
- Founding / Statutory Documents
- Licences, Permits
- Minutes and Recordings of Management, Staff, Governing Bodies and shareholder / Member Meetings
- Company Director, Shareholder/Member and Statutory Registers
- Organizational Policies, Procedures and Codes of Conduct

Human Resource Records (Current and Previous Employees)

- Accounting and Payroll Records
- Conditions of Service
- Employee Records
- Employment Contracts
- Employment Equity Records
- General Correspondence
- Industrial and Labour Relations Records
- Information relating to Health and Safety Regulations
- PAYE Records and Returns
- Pension and Provident Fund Records
- Performance Appraisals
- Personnel Guidelines, Policies and Procedures
- Remuneration Records and Policies
- Salary Surveys
- Skills Requirements
- Staff Recruitment Policies
- Statutory Records
- Training Records

Fixed Property

- Building plans
- Leases / Title Deeds

-Mortgage bonds or other encumbrances

Operation Records

- Brochures and Marketing Publications
- Client and Customer Registry and Particulars
- General and Confidential Correspondence
- Employee Sales Performance, historical and Work-In-Progress
- Marketing, Strategies and Marketing Records
- Production Records
- Sales Records
- Suppliers Registry

Finance Records

- Annual Financial Statements
- Asset Register
- Banking, Financial and Accounting Records
- Budgets
- Contracts
- Employment Equity
- General Correspondence
- Insurance Information, Policies and Claims
- Internal Audit Records
- Management Accounts
- Purchase and Order Information
- Stock Records
- Tax Records (Company and employee)

Information Technology Records

- IT Policies and Procedures
- Network Diagrams
- User Manuals
- Agreements and Licenses
- Audits and Audit Trails
- User Access Information
- Client and Supplier Databases
- General Infrastructure, network usage and operational system deployment and development

Intellectual Property

- Agreements relating to intellectual property
- Copyrights
- Litigation and other disputes involving intellectual property
- Patents, patent applications and inventions
- Designs, trademarks, trade names and protected names

Legal, Agreements and Contracts

- Acquisition or disposal documentation

- Agreements with and related to contractors, suppliers, distributors, dealers, agencies, clients, governmental agencies, shareholders, officers or directors and other matters relating to the provision of services or materials.
- Complaints, pleadings, briefs and other documents pertaining to actual, pending or threatened litigation, arbitration or investigation
- Joint venture agreements, partnership agreements, participation, franchise, co-marketing, co-promotion or other alliance agreements

8 CATEGORIES OF DATA SUBJECTS

The Company retains information and records on its engagements with all its stakeholders, whether natural or juristic persons, which may include but is not limited to prospective, existing, and former:

- 8.1 Clients and their employees, representatives, agents, contractors and service providers;
- 8.2 Employees (including contractors, agents, temporary and casual employees);
- 8.3 Suppliers, service providers, business partners and their respective authorised employees, representatives, agents, contractors and service providers of such suppliers and service providers;
- 8.4 Visitors (walk in) and other persons that make enquiries with the Company from time to time physically at the Company's offices or electronically through the Company's website and other media access mediums; and
- 8.5 Group Companies and their employees, representatives, agents, contractors and service providers;

9 CATEGORIES OF PERSONAL INFORMATION PROCESSED

9.1 The Company processes and stores various categories of personal information on its data subjects where relevant for the purpose of fulfilling its businesses' function, objectives, administration, services and products as well as maintaining its legal, compliance and financial reporting requirements, inclusive but not limited to the following types of personal information:

- Authorised signatories, beneficiaries, governing body members and ultimate beneficial owners
- BBBEE information
- Confidential correspondence
- Offences / alleged offences
- Financial, transactional, and banking information
- Founding documents
- Employee Medical, dental and health related information
- Trade union membership of employees
- Educational background information, qualifications, and employment history
- Names of contact persons and representatives
- Age, Gender, Nationality and ethnic origin information
- Online identifier or other particular assignment to the person

- Names, ID / Passport / Registration Numbers, email, physical and postal addresses together with other contact particulars;
- Tax related information;
- personal opinions, views or preferences

10 PURPOSE OF PROCESSING PERSONAL INFORMATION

10.1 Personal information is processed and stored by the Company on its data subjects where relevant for the purpose of fulfilling its businesses' function, objectives, administration, services and products as well as maintaining its legal, compliance and financial reporting requirements. Such processing activities and records may be pursuant to purposes of including but not limited to:

- | | |
|---|---|
| - To manage information, products and/or services requested by and provided to by data subjects | - Legal or contractual purposes |
| - To help us identify data subjects when they contact us | - Health and safety purposes |
| - To manage our customers and clients and to maintain their records | - To monitor access, secure and manage our premises and facilities |
| - Recruitment purposes | - To transact with our suppliers |
| - Employment purposes | - To improve the quality of our products and services |
| - Apprenticeship purposes | - To help us detect and prevent fraud and money laundering under FICA |
| - Training purposes | - To help us recover debts |
| - Travel purposes | - Marketing purposes |
| - General administration | - Engaging with the public |
| - Financial and tax purposes | - Travel and accommodation |

11 RECIPIENTS WITH WHOM PERSONAL INFORMATION IS SHARED

11.1 In processing personal information, we may share it within our group of companies or with other third parties. These include but are not limited to:

- | | |
|--|---|
| - Statutory authorities | agencies |
| - Law enforcement agencies | - Email management, electronic transmission and distribution tools, servers, and service providers, data storage providers and server hosts |
| - Tax authorities | |
| - Medical schemes | |
| - Employee pension and provident funds | |
| - Industry bodies | |
| - Contractors, vendors, or suppliers | - Group companies |
| - Payment processors, debt collection | - Agents |

- Service providers processed
- Banks and other financial institutions. - Third party verification agencies and credit bureau
- Employees of the organisation
- Employment and recruitment agencies - Trade unions where employees are represented by such
- Family, associates and representatives of the person whose personal information is

12 TRANSBORDER FLOWS OF PERSONAL INFORMATION

- 12.1 The Company may transfer to, and store personal information we collect on our data subjects, in countries other than South Africa, if the relevant business transactions or situation requires trans-border processing of information, data sharing with international group companies or for the purposes of cloud, back up and other data storage requirements. Where countries may not have the same or higher data protection laws as South Africa, the Company will only transfer the information if we have consent of the data subject, or if it is necessary for the performance or conclusion of a contract between the Company and the data subject.

13 PERSONAL INFORMATION SECURITY MEASURES, DATA BREACHES AND THIRD PARTIES

- 13.1 The Company has identified its security risks over the personal information that it processes in line with POPIA and have implemented various security measures to ensure reasonable protection against the risk of loss, misuse, unauthorised access and disclosure, alteration and destruction of the personal information. We also take steps to ensure that operators that process personal information on behalf of the Company apply adequate safeguards.
- 13.2 Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, the Company shall notify the Regulator and the data subject, unless the identity of such data subject cannot be established. The notification will be made as soon as reasonably possible after the discovery of the compromise, considering the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the responsible party's information system.
- 13.3 When the Company receives personal information from a third party on behalf of a data subject, it assumes confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual, and do not have any objection to our processing their information in accordance with this manual. Where information on third parties is provided by a data subject, or a third party provides information on a data subject, that information may be considered with other personal information.

14 AVAILABILITY OF MANUAL

- 14.1 A copy of the Manual is available-

- 14.1.1 on our website;
 - 14.1.2 head office of the body for public inspection during normal business hours;
 - 14.1.3 to any person upon request and upon the payment of a reasonable prescribed fee;
and
 - 14.1.4 to the Information Regulator upon request.
- 14.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

15 ACCESS REQUESTS

- 15.1 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.
- 15.2 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:
- 15.2.1 The Access Request Form must be completed;
 - 15.2.2 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;
 - 15.2.3 Complete the form in BLOCK LETTERS and answer every question;
 - 15.2.4 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;
 - 15.2.5 If there is insufficient space on a printed form, additional information may be provided on an attached folio;
 - 15.2.6 When the use of an attached folio is required, precede each answer with the applicable title.
- 15.3 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
- 15.4 This fee is not applicable to personal requesters referring to any person seeking to access records that contain their personal information.
- 15.5 An initial, request fee of R57.00 (including VAT) is payable on submission.
- 15.6 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.

- 15.7 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.
- 15.8 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.
- 15.9 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.
- 15.10 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,
- 15.11 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.

16 REQUESTS FOR DELETION AND CORRECTION

- 16.1 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.
- 16.2 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](#) [Regulation 3(2)]:
 - 16.2.1 The Request for Correction or Deletion Form must be completed.
 - 16.2.2 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.
 - 16.2.3 Complete the form in BLOCK LETTERS and answer every question.
 - 16.2.4 If a question does not apply state N/A in response to that question.
 - 16.2.5 If there is nothing to disclose in reply to a particular question state “nil” in response to that question.
 - 16.2.6 If there is insufficient space on a printed form, additional information may be provided on an attached folio.
 - 16.2.7 When the use of an attached folio is required, precede each answer with the applicable title.

- 16.3 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.
- 16.4 The Company will as soon as reasonably practicable:
- 16.4.1 correct the information;
 - 16.4.2 destroy or delete the information;
 - 16.4.3 provide credible evidence in support of the information or
 - 16.4.4 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.
- 16.5 The Company will provide notification of the action taken as a result of the Request for Correction or Deletion Form.
- 16.6 No fees are payable in respect of requests for correction or deletion of personal information.

17 OBJECTIONS TO PROCESSING PERSONAL INFORMATION PROCEDURE

- 17.1 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.
- 17.1.1 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](#) [Regulation 2(1)]:
- 17.1.1.1 The Objection Form must be completed
 - 17.1.1.2 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.
 - 17.1.1.3 Complete the form in BLOCK LETTERS and answer every question.
 - 17.1.1.4 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.
 - 17.1.1.5 If there is insufficient space on a printed form, additional information may be provided on an attached folio.
 - 17.1.1.6 When the use of an attached folio is required, precede each answer with the applicable title.

- 17.2 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.
- 17.3 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.
- 17.4 No fees are payable in respect of objections to processing personal information.

18 GROUNDS FOR REFUSAL: OF ACCESS TO RECORDS OR TO CORRECT OR DELETE PERSONAL INFORMATION OR DISCONTINUE PROCESSING PERSONAL INFORMATION

- 18.1 The main grounds for refusal of a request to access information are:
 - 18.1.1 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.
 - 18.1.2 Mandatory protection of the commercial information of a third party, if the record contains:
 - 18.1.2.1 Trade secrets of that party ;
 - 18.1.2.2 Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that party;
 - 18.1.2.3 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.
 - 18.1.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
 - 18.1.4 Mandatory protection of the safety of individuals and the protection of property.
 - 18.1.5 Mandatory protection of records which could be regarded as privileged in legal proceedings.
 - 18.1.6 The Commercial Activities of the Company which may include:
 - 18.1.6.1 Trade secrets of the Company
 - 18.1.6.2 Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the Company.
- 18.2 The main grounds for refusal of a to correct or delete information are:
 - 18.2.1 Credible evidence in support of the personal information held;
 - 18.2.2 The Information is being retained in terms of applicable legislation and/or the Company's Record Retention and Destruction Policy; or
 - 18.2.3 The Personal Information is necessary to carry out our mandate or in terms of applicable legislation.
- 18.3 The main grounds for refusal to discontinue processing personal information:
 - 18.3.1 No reasonable grounds exist to discontinue processing the personal information;
 - 18.3.2 The information is being processed in terms of applicable legislation; or
 - 18.3.3 The objection is not in respect of information being processed in terms of section 11(d)

to (f) of POPIA.

19 REMEDIES

- 19.1 The Company does not have an internal appeal procedure that may be followed after a request to access personal information by a data subject is denied, the decision by the Information Officer and Deputy Information Officers of the Company shall be final. In the event that a person is not satisfied with the outcome of the decision following a request for information such person is entitled to apply to a court of competent jurisdiction to take the matter further.
- 19.2 A third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction if they are affected by a request for information from another person that was approved by the Information Officer and Deputy Information Officers as set out in this manual.

20 UPDATING OF MANUAL

- 20.1 The Company reserves the right to update this manual regularly from time to time as it deems fit and only the latest published version of this manual may be utilised.