

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



Standard Website Privacy & Cookies Policy

Where we refer to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. As a general rule we will only process your personal information if this is required to deliver or offer a service, provide a product or carry out a transaction.

We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

In this document any reference to “we” or “us” or “our” includes our company and any of its subsidiaries.

If you use our services, goods, products, and service channels you agree that we may process your personal information as explained under this Privacy Policy. Sometimes you may provide us with consent to process your personal information. Read it carefully because it may limit your rights.

As a global organisation this Privacy Policy will apply to the processing of personal information by any member of our company. If we process personal information for another party under a contract or a mandate, the other party’s privacy policy will apply to the processing.

We can change this Privacy Policy from time to time if the law or its business practices requires it.

The version of the Privacy Policy displayed on our website will apply to your interactions with us.

What is personal information?

Personal information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

- your marital status (like married, single, divorced).

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



- your national origin.
- your age.
- your language; birth; education.
- your financial history (like your income, third party payments made on your behalf and the like)
- your identifying number (like an employee number, identity number or passport number).
- your e-mail address; physical address (like residential address, work address or your physical location); telephone number.
- your biometric information (like fingerprints, your signature or voice).
- your race; gender; sex; pregnancy; ethnic origin; social origin; colour; sexual orientation.
- your physical health; mental health; well-being; disability; religion; belief; conscience; culture.
- your medical history (like your HIV / AIDS status); criminal history; employment history.
- your personal views, preferences, and opinions.
- your confidential correspondence; and / or
- another's views or opinions about you and your name also constitute your personal information.
- Personal information includes special personal information, as explained below.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



When will we process your personal information?

We will only process your personal information for lawful purposes relating to our business if the following applies:

- if you have consented thereto.
- if a person legally authorised by you, the law, or a court, has consented thereto.
- if it is necessary to conclude or perform under a contract, we have with you.
- if the law requires or permits it.
- if it is required to protect or pursue your, our or a third party's legitimate interest.

What is special personal information?

Special personal information is personal information about the following:

- your race (like where a company submits reports to the Department of Labour where the statistical information must be recorded).
- your ethnic origin.
- your trade union membership.
- your health (like where you apply for an insurance policy).
- your biometric information (like to verify your identity); and / or your criminal behaviour and alleged commission of an offence.

When will we process your special personal information?

We may process your special personal information in the following circumstances:

- if you have consented to the processing.
- if the information is being used for any Human resource or payroll requirement.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



- if the processing is needed to create, use, or protect a right or obligation in law.
- if the processing is for statistical or research purposes and all legal conditions are met.
- if the special personal information was made public by you.
- if the processing is required by law.
- if racial information is processed, and the processing is required to identify you; and / or if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligation.

When and from where we obtain personal information about you

- We collect personal information from the payroll or HR departments of our clients when they capture financial and non-financial information.
- We collect personal information from 3rd parties that are directly integrated with our software platform.
- We collect information about you based on your use of our products, services, or service channels.
- We collect information about you based on how you engage or interact with us such as via our support desk, emails, letters, telephone calls and surveys.

If the law requires us to do so, we will ask for your consent before collecting personal information about you from third parties.

The third parties from whom we may collect your personal information include, but are not limited to, the following:

- Partners of our company for any of the purposes identified in this Privacy Policy.
- your spouse, dependents, partners, employer, and other similar sources.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



- people you have authorised to share your personal information, like a person that makes a travel booking on your behalf or a medical practitioner for insurance purposes.
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
- payment processing services providers, merchants, banks, and other persons that assist with the processing of your payment instructions, like EFT transaction partners.
- insurers, brokers, other financial institutions, or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes.
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities.
- trustees, Executors or Curators appointed by a court of law.
- our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you.
- courts of law or tribunals.
- participating partners, whether retail or online, in our customer loyalty reward programmes.
- our joint venture partners; and / or

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



Reasons we need to process your personal information.

- We will process your personal information for the following reasons:
 - to provide you with products, goods, and services
 - to market our products, goods, and services to you.
 - to respond to your enquiries and complaints.
 - to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions, and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests.
 - to conduct market and behavioural research, including scoring and analysis to determine if you qualify for products and services or to determine your credit or insurance risk.
 - to develop, test and improve products and services for you.
 - for historical, statistical and research purposes, like market segmentation.
 - to process payment instruments.
 - to create, manufacture and print payment issues (like a payslip)
 - to enable us to deliver goods, documents, or notices to you.
 - for security, identity verification and to check the accuracy of your personal information.
 - to communicate with you and carry out your instructions and requests.
 - for customer satisfaction surveys, promotional offerings.
 - insurance and assurance underwriting and administration.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



- to process or consider or assess insurance or assurance claims.
- to provide insurance and assurance policies and products and related services.
- to enable you to take part in customer loyalty reward programmes, to determine your qualification for participation, earning of reward points, determining your rewards level, monitoring your buying behaviour with our rewards partners to allocate the correct points or inform you of appropriate products, goods, and services you may be interested in or to inform our reward partners about your purchasing behaviour.
- to enable you to take part in and make use of value-added products and services.
- to assess our lending and insurance risks; and / or
- for any other related purposes.

How we use your personal information for marketing

- We will use your personal information to market financial, insurance, investments and other related banking products and services to you.
- We may also market non-banking or non-financial products, goods, or services to you.
- We will do this in person, by post, telephone, or electronic channels such as SMS, email, and fax.
- If you are not our customer, or in any other instances where the law requires, we will only market to you by electronic communications with your consent.
- In all cases you can request us to stop sending marketing communications to you at any time.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



When how and with whom we share your personal information

In general, we will only share your personal information if any one or more of the following apply:

- if you have consented to this.
- if it is necessary to conclude or perform under a contract, we have with you;
- if the law requires it; and / or
- if it's necessary to protect or pursue your, our or a third party's legitimate interest.

Under what circumstances will we transfer your information to other countries?

We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:

- where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient.
- where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest.
- where you have consented to the transfer; and / or
- where it is not reasonably practical to obtain your consent, the transfer is in your interest.

This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

An example of us transferring your personal information to another country is where foreign payments take place if you purchase goods or services in a foreign country.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



TAKE NOTE: We are a global organisation your personal information may be shared within all our company entities in other countries and processed in those countries.

Your duties and rights about the personal information we have about you.

- You must provide proof of identity when enforcing the rights below.

You must inform us when your personal information changes.

Please refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how you can give effect to the rights listed below.

You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- confirmation that we hold your personal information.
- a copy or description of the record containing your personal information; and
- the identity or categories of third parties who have had access to your personal information.

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. We will inform you of the fee before attending to your request.

Please note that the law may limit your right to access information.

You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or we are no longer authorised to keep it. You must inform us of your request in writing. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

You may object on reasonable grounds to the processing of your personal information.

We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and our processing done according to your consent or the processing is necessary to conclude or perform under a contract with you.

Where you have provided your consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information. You must inform us of any objection in writing. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right.

You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.

How we secure your personal information

- We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:
- keeping our systems secure (like monitoring access and usage);
- storing our records securely.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



- controlling the access to our buildings, systems and/or records; and
- safely destroying or deleting records.
- Ensure compliance with international ISO security standards.
- You can also protect your personal information. Please visit the website of the relevant business you have established a business relationship with for more information.

How long do we keep your personal information?

We will keep your personal information for as long as:

- the law requires us to keep it.
- a contract between you and us requires us to keep it.
- you have consented for us keeping it.
- we are required to keep it to achieve the purposes listed in this Privacy Policy.
- we require it for statistical or research purposes.
- a code of conduct requires us to keep it; and / or
- we require it for our lawful business purposes.

Take note: We may keep your personal information even if you no longer have a relationship with us, for the historical data that may be required by your employer or employee.

Our cookie policy

A cookie is a small piece of data sent from our websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise your experience on our websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, like the computer or smart phone.

Address: West End Office Park,
Building C, 3rd Floor,
246 Hall Street, Centurion,
Gauteng, South Africa
Tel: +27(0)12 644 1181
Fax: +27(0)12 644 1185



By using our websites or applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable us to know that you have visited the website or application before and will identify you. We may also use the cookie to prevent fraud and for analytics.



A AND B GLOBAL MINING (PTY) LTD

This manual has been prepared in terms of the section 51 of the Promotion of Access to Information Act 2 of 2000 and to address the requirements of the Protection of Personal Information Act 4 of 2014.

1. Table of Contents

1. Table of Contents.....	2
1. DEFINITIONS.....	3
2. INTRODUCTION	6
3. CONTACT DETAILS	6
4. GUIDE OF THE INFORMATION REGULATOR.....	7
5. LATEST NOTICES IN TERMS OF SECTION 52(2) OF PAIA	7
6. AVAILABILITY OF CERTAIN RECORDS IN TERMS OF PAIA.....	8
7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION.....	9
8. REQUEST PROCESS	10
9. GROUNDS FOR REFUSAL.....	11
10. REMEDIES SHOULD A REQUEST BE REFUSED	13
11. Fees.....	13
12. POPI.....	14
Annexures	
Annexure A.....	19
Annexure B.....	20
Annexure C.....	24

1. DEFINITIONS

Client	any natural or juristic person that received or receives services from the Company
Conditions for Lawful Processing	the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPI and in paragraph 12 of this Manual
Data Subject	the person to whom personal information relates
Information Officer	the individual who is identified in paragraph 3 of this manual
Manual	this manual
PAIA	the Promotion of Access to Information Act 2 of 2000
Personal Information	means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to— <ol style="list-style-type: none">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, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d. the biometric information of the person;
- e. the personal opinions, views or preferences of the person;
- f. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g. the views or opinions of another individual about the person; and
- h. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

Personnel

any person who works for, or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Company, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers

POPI

the Protection of Personal Information Act 4 of 2013

POPI Regulations	the regulations promulgated in terms of section 112(2) of POPI
Private Body	means— <ol style="list-style-type: none">a natural person who carries or has carried on any trade, business or profession, but only in such capacity;a partnership which carries or has carried on any trade, business or profession; orany former or existing juristic person, but excludes a public body
Processing	means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including— <ol style="list-style-type: none">the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;dissemination by means of transmission, distribution or making available in any other form; ormerging, linking, as well as restriction, degradation, erasure or destruction of information
SAHRC	the South African Human Rights Commission

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

2. INTRODUCTION

- 2.1. For the purpose of POPI and PAIA, the Company is defined as a private body. In accordance with the Company's obligations in terms of POPI and PAIA, the Company has produced this manual.
- 2.2. This manual sets out all information required by both PAIA and POPI.
- 2.3. This manual also deals with how requests are to be made in terms of PAIA.
- 2.4. This manual also establishes how compliance with POPI is to be achieved.

3. CONTACT DETAILS

**A and B Global Mining (Pty)
Ltd**

Registration Number:

2020/860710/07

Physical Address:

**West End Office Park
Building C, 3rd Floor
246 Hall Street
Centurion
0157**

Postal Address:

**PO Box 11618
Die Hoewes, Ext 286
0163**

Contact Number:

(012) 644 1199

Information Officer:

Devendra Vyas

Email address:

dev@abglobalmining.co.za

Background information of the Company can be found at:

<https://abglobalmining.co.za/>

4. GUIDE OF THE INFORMATION REGULATOR

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

Information Regulator:

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone: (010) 023 5200

Website: www.justice.gov.za

Email: PAIACompliance.IR@justice.gov.za

5. LATEST NOTICES IN TERMS OF SECTION 52(2) OF PAIA

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

6. AVAILABILITY OF CERTAIN RECORDS IN TERMS OF PAIA

6.1. The Company holds and/or process the following records for the purposes of PAIA and POPI.

6.2. The following records may be requested, however it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

Products and/or Services:

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

Human Resources:

- Employment Contracts
- Personnel records and correspondence
- Training records
- Internal policies

Legal:

- Agreements with Clients
- Agreement with Suppliers
- Shareholder agreements
- Licenses
- Lease agreements

Company Secretarial:

- Memorandum of Incorporation
- Secretarial records

- Tradename registrations
- Company registration documents
- Statutory registers
- Register of Directors
- Share Certificates

Financial:

- Accounting records
- Annual reports
- Interim reports
- Auditor details and reports
- Tax returns
- Insurance records

Client:

- Client database
- Correspondence with Clients
- Documentation prepared for Clients.
- Invoices, receipts, credit and debit notes

Marketing:

- Published Marketing material

Miscellaneous:

- Internal Correspondence
- Information technology records
- Trade secrets
- Domain name registrations
- Website information

7. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

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

- 7.1.1. Basic Conditions of Employment Act, No. 75 of 1997
- 7.1.2. Companies Act, No. 71 of 2008
- 7.1.3. Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- 7.1.4. Constitution of the Republic of South Africa Act, No. 108 of 1996
- 7.1.5. Employment Equity Act, No. 55 of 1998
- 7.1.6. The Labour Relations Act, No. 66 of 1995
- 7.1.7. Skills Development Levies Act, No. 9 of 1999
- 7.1.8. Unemployment Insurance Act, No. 63 of 2001
- 7.1.9. Electronic Communication and Transactions Act, No. 25 of 2002
- 7.1.10. Patents, Designs and Copyright Merchandise Marks Act, No. 17 of 1941
- 7.1.11. Income Tax Act, No. 58 of 1962
- 7.1.12. Occupational Health and Safety Act No. 85 of 1993
- 7.1.13. Transfer Duty Act No. 40 of 1949
- 7.1.14. Machinery and Occupational Safety Amendment Act No. 181 of 1993

8. REQUEST PROCESS

- 8.1. An individual who wishes to place a request must comply with all the procedures laid down in PAIA.
- 8.2. The requester must complete **ANNEXURE B**, which is attached hereto and submit it to the Information Officer at the details specified above.
- 8.3. The prescribed form must be submitted as well as payment of a request fee and a deposit, if applicable to the information officer at the postal or physical address, fax number or electronic mail as is stated herein.
- 8.4. The prescribed form must be completed with enough particularity to enable the information officer to determine:
 - 8.4.1. The record(s) requested;
 - 8.4.2. The identity of the requestor;
 - 8.4.3. What form of access is required; and
 - 8.4.4. The Postal address or fax number of the requestor.

- 8.5. The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records requested is required to exercise or protect the right.
- 8.6. The request for access will be dealt with within 30 days from date of receipt, unless the requestor has set out special grounds that satisfies the Information Officer that the request be dealt with sooner.
- 8.7. The period of 30 days may be extended by not more than 30 additional days, if the request is for a large quantity of information, or the request requires a search for information held at another office of the Company and the information cannot be reasonably obtained within 30 days. The information officer will notify the requestor in writing should an extension be necessary.
- 8.8. The requestor will be informed in writing whether access to the records have been granted or denied. If the requestor requires a reason for the decision the request must be expressed in the prescribed form, the requestor must be further stated what particulars of the reasoning the requestor requires.
- 8.9. If a requestor has requested the records on another individual's behalf, the requestor must submit proof of the capacity the requestor submits the request in, to the satisfaction of the information officer.
- 8.10. Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the Information Officer for assistance.
- 8.11. An oral request can be made to the Information Officer should the requestor be unable to complete the form due to illiteracy or a disability. The Information Officer will complete the form on behalf of the requestor and provide a copy of the form to the requestor.

9. GROUNDS FOR REFUSAL

- 9.1. The following are grounds upon which the Company may, subject to the exceptions in Chapter 4 of PAIA, refuse a request for access in accordance with Chapter 4 of PAIA:

- 9.1.1. Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable
- 9.1.2. Mandatory protection of the commercial information of a third party, if the Records contain:
 - 9.1.2.1. Trade secrets of that third party;
 - 9.1.2.2. Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 9.1.2.3. Information disclosed in confidence by a third party to The Company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;
- 9.1.3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 9.1.4. Mandatory protection of the safety of individuals and the protection of property;
- 9.1.5. Mandatory protection of Records that would be regarded as privileged in legal proceedings;
- 9.1.6. Protection of the commercial information of the Company, which may include:
 - 9.1.6.1. Trade secrets;
 - 9.1.6.2. Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Company;
 - 9.1.6.3. Information which, if disclosed, could put the Company at a disadvantage in contractual or other negotiations or prejudice the Company in commercial competition; and/or
 - 9.1.6.4. Computer programs which are owned by the Company, and which are protected by copyright and intellectual property laws;
- 9.1.7. Research information of the Company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and

- 9.1.8. Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10. REMEDIES SHOULD A REQUEST BE REFUSED

- 10.1. The Company does not have an internal appeal procedure in light of a denial of a request, decisions made by the information officer is final;
- 10.2. The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 days of notification of the decision for appropriate relief.

11. Fees

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

Request fee	R140.00
(payable on every request)	
Photocopy of an A4 page or part thereof	R2.00
Printed copy of an A4 page or part thereof	R2.00
Hard copy on flash drive	R40.00
(flash drive to be provided by requestor)	
Hard copy on a compact disc	R40.00
(compact disc to be provided by requestor)	
Hard copy on a compact disc	R60.00
(compact disc to be provided by the Company)	
Transcription of visual images per A4 page	As per
	quotation of
	service provider

Copy of visual images	As per quotation of service provider
Transcription of an audio record per A4 page	R24.00
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00
Copy of an audio on a compact disc (compact disc to be provided by the Company)	R60.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	R145.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)	R435.00
Postage, email or any other electronic transfer	Actual expense, if any.

12. POPI

12.1. Conditions for lawful processing:

12.1.1. POPI has eight conditions for lawful processing and includes:

12.1.1.1. Accountability

12.1.1.2. Processing limitation

12.1.1.3. Purpose specification

- 12.1.1.4. Further processing limitation
- 12.1.1.5. Information quality
- 12.1.1.6. Openness
- 12.1.1.7. Security safeguards
- 12.1.1.8. Data subject participation
- 12.1.2. The Company is involved in the following types of processing:
 - 12.1.2.1. Collection
 - 12.1.2.2. Recording
 - 12.1.2.3. Organization
 - 12.1.2.4. Structuring
 - 12.1.2.5. Storage
 - 12.1.2.6. adaptation or alteration
 - 12.1.2.7. retrieval
 - 12.1.2.8. consultation
 - 12.1.2.9. use
 - 12.1.2.10. disclosure by transmission
 - 12.1.2.11. dissemination or otherwise making available
 - 12.1.2.12. alignment or combination
 - 12.1.2.13. restriction
 - 12.1.2.14. erasure
 - 12.1.2.15. destruction
- 12.1.3. The Company processes information for the following purposes:
 - 12.1.3.1. to fulfil agreements in relation to its employees;
 - 12.1.3.2. to provide services to its Clients in accordance with terms agreed to by the Clients;
 - 12.1.3.3. to undertake activities related to the provision of services, such as
 - 12.1.3.3.1. to fulfil domestic legal, regulatory and compliance requirements
 - 12.1.3.3.2. to verify the identity of Customer representatives who contact the Company or may be contacted by The Company;
 - 12.1.3.3.3. for risk assessment, information security management, statistical, trend analysis and planning purposes;

- 12.1.3.3.4. to monitor and record calls and electronic communications with the Client for quality, training, investigation and fraud prevention purposes;
 - 12.1.3.3.5. to enforce or defend the Company or the Company affiliates' rights;
 - 12.1.3.3.6. to manage the Company's relationship with its clients, which may include providing information to its clients and its clients affiliates about the Company's and the Company affiliates' products and services;
 - 12.1.3.4. the purposes related to any authorised disclosure made in terms of agreement, law or regulation;
 - 12.1.3.5. any additional purposes expressly authorised by the Company's client;
 - 12.1.3.6. any additional purposes as may be notified to the Client or Data Subjects in any notice provided by the Company.
- 12.2. The Company processes personal information the following categories of Data Subjects:
- 12.2.1. Juristic persons –
 - 12.2.1.1. Corporate clients
 - 12.2.1.2. Suppliers
 - 12.2.2. Natural persons –
 - 12.2.2.1. Individuals
 - 12.2.2.2. Staff
 - 12.2.2.3. Clients
 - 12.2.2.4. Suppliers
- 12.3. The Company process the following categories personal information:
- 12.3.1. Client profile information;
 - 12.3.2. Bank account details;
 - 12.3.3. Payment information;
 - 12.3.4. Client representatives;
 - 12.3.5. Names;
 - 12.3.6. Email Addresses;
 - 12.3.7. Telephone numbers;
 - 12.3.8. Facsimile numbers;

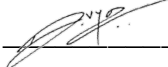
- 12.3.9. Physical addresses;
- 12.3.10. Tax numbers;
- 12.3.11. Identity Numbers;
- 12.3.12. Passport Numbers;
- 12.4. Recipients of Personal Information:
 - 12.4.1. The Company, the Company's affiliates, their respective representatives
- 12.5. When making authorised disclosures or transfers of personal information in terms of Section 72 of POPI, personal information may be disclosed to recipients in countries that do not have the same level of protection for personal information as South Africa does.
- 12.6. The following Security measures are implemented by the Company:
- 12.7. The Company implements numerous Security measures to protect personal information that is stored electronically and physically.
 - 12.7.1.1. The Company ensures that appropriate security measures are taken and updates these measures on a regular basis.
 - 12.7.1.2. The Company have also implemented various policies for additional security for personal information stored both physically and electronically.
 - 12.7.2. The personal information that is stored physically is protected as follows:
 - 12.7.2.1. Where physical records of the data exist, such records will be stored in a secure area that can be 'locked-away' as to avoid a breach of the personal information.
 - 12.7.2.2. Such physical data records will be 'locked-away' and secured when not in use.
- 12.8. The Company may share personal information with third parties and in certain instances this may result in cross border flow of the personal information. The personal information will always be subject to protection, not less than the protection it is afforded under the Protection of Personal Information Act No.4 of 2013.
- 12.9. Objection to the processing of personal information by a data subject:
 - 12.9.1. Section 11(3) of POPI and regulation 2 of the POPI regulations provides that a data subject may, at any time object to the

processing of their personal information in the prescribed form attached to this manual as annexure "B".

12.10. Request for correction or deletion of personal information:

12.10.1. Section 24 of POPI and regulation 3 of the POPI regulations provides that a data subject may request for their personal information to be corrected and/or deleted in the prescribed form attached hereto as **ANNEXURE "C"**.

SIGNATURE INFORMATION OFFICER: DEVENDRA VYAS

SIGNATURE:  _____

DATE: 10/06/2022

ANNEXURE A

FORM 1

REQUEST FOR A COPY OF THE GUIDE

[Regulations 3]

TO: The Information Officer

I,

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

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

Language (mark with "X")	No of copies	Language (mark with "X")	No of copies
<input type="checkbox"/> Sepedi		<input type="checkbox"/> Sesotho	
<input type="checkbox"/> Setswana		<input type="checkbox"/> siSwati	
<input type="checkbox"/> Tshivenda		<input type="checkbox"/> Xitsonga	
<input type="checkbox"/> Afrikaans		<input type="checkbox"/> English	
<input type="checkbox"/> isiNdebele		<input type="checkbox"/> isiXhosa	
<input type="checkbox"/> isiZulu			

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

ANNEXURE B

FORM 2
REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

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

TO: The Information Officer

 (Address)

E-mail address:

Fax number:

Mark with an "X"

- Request is made in my own name Request is made on behalf of another person.

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

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

FORM OF ACCESS <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	

MANNER OF ACCESS <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>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<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 <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

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

Signature of Information Officer

ANNEXURE C

14 No. 42110

GOVERNMENT GAZETTE, 14 DECEMBER 2018

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.

A	DETAILS OF THE DATA SUBJECT
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	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	Code ()
Contact number(s):	

Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED
D	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at this day of20.....

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