



INFORMATION MANUAL

**IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT, NO. 2 OF 2000, ("PAIA"), AND SECTION 18 OF
THE PROTECTION OF PERSONAL INFORMATION ACT, NO. 4 OF 2013,
("POPI") COMPILED FOR:**

Lockton South Africa (Pty) Ltd
with Registration Number 2005/037205/07
("the Private Body")

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1 **INTRODUCTION**

- 1.1 This Information Manual is published in terms of section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act, No. 4 of 2013, ("POPIA") as well as section 18 of the POPIA.
- 1.2 PAIA gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/or protection of any right.
- 1.3 The POPIA gives effect to the provisions of, inter alia, Section 14 of the Constitution, which provides for the right to privacy of all persons.
- 1.4 The information provided in this manual includes:
 - 1.4.1 contact details of the Information Officer, as defined in PAIA, of the Private Body;
 - 1.4.2 a description of the records of the Private Body which are available in terms of any legislation other than the PAIA;
 - 1.4.3 a description of the subjects on which the Private Body holds records and the categories of records held on each subject;
 - 1.4.4 a description of the subjects on which the Private Body holds personal information and the categories of personal information held on each subject;
 - 1.4.5 the purpose of processing personal information;
 - 1.4.6 the recipients to whom the personal information may be supplied;
 - 1.4.7 planned transborder flows of information (if applicable);
 - 1.4.8 a general description of the security measures in place to ensure the confidentiality, integrity, and availability of the information to be processed;
 - 1.4.9 sufficient information so as to facilitate a request for access to a record of the Private Body;
- 1.5 The reference to any information in addition to that specifically required in terms of section 51 of PAIA and section 18 of the POPIA does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of PAIA and the POPIA.
- 1.6 The main aim of this manual is to:
 - 1.6.1 disclose the types of records held by the Private Body and to facilitate the requests for access to records of the Private Body, as permitted by PAIA (dealt with in Part A hereof);
 - 1.6.2 make data subjects aware of the type and source of information being collected, the purpose of collecting and processing such information and related matters (dealt with in Part B hereof).

This manual may be updated from time to time and shall be made available on the Private Body's website and/or at its principal place of business, to any person on request, subject to the payment

of a reasonable fee and to the Information Regulator.

2 DEFINITIONS AND INTERPRETATION

- 2.1 In this document, clause headings are for convenience and shall not be used in its interpretation unless the context clearly indicates a contrary intention:
- 2.2 An expression which denotes –
- 2.2.1 any gender includes the other genders;
 - 2.2.2 a natural person includes an artificial or juristic person and vice versa;
 - 2.2.3 the singular includes the plural and vice versa;
- 2.3 The following expressions shall bear the meanings assigned to them below and similar expressions bear corresponding meanings:
- 2.3.1 **"data subject"** means the person to whom personal information relates;
 - 2.3.2 **"Personal Information"** means information relating to an identifiable living, natural person, and where it is applicable, an identifiable existing juristic person;
 - 2.3.3 **"this document"** or **"this manual"** means this information manual, together with all of its annexures, as amended from time to time;
 - 2.3.4 **"the Private Body"** means the private body to which this manual applies with their details as they appear on the front page of this manual;
 - 2.3.5 **"requester"** means a person or entity requesting access to a record that is under the control of the Private Body.
- 2.4 Any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation or other legislation as at the signature date, and as amended or substituted from time to time;
- 2.5 If any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this manual;
- 2.6 Where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this manual;
- 2.7 Where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding business day;
- 2.8 Any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months or years, as the case may be or as is otherwise defined in any legislation;
- 2.9 The use of the word "including" followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and the eiusdem generis rule shall not be applied in the interpretation of such general wording or such specific example/s;
- 2.10 Insofar as there is a conflict in the interpretation of or application of this manual and PAIA or the POPIA, PAIA or the POPIA shall prevail;
- 2.11 This manual does not purport to be exhaustive of or comprehensively deal with every procedure provided for in PAIA or all rights listed under the POPIA. The reader relying on any provisions of this Manual is advised to familiarise his/her/itself with the provisions of PAIA and the POPIA.

3 CONTACT DETAILS OF THE PRIVATE BODY

Section 51(1)(a)(i) of PAIA and section 18 (1)(b) of the POPIA

3.1 Information Officer:

Riccardo Matteci

- 3.1.1. Postal Address of Information Officer: PO Box 1317, Fourways, 2055.
- 3.1.2. Street Address the Private Body: The Crossing Office Park, 372 Main Road, Bryanston.
- 3.1.3. Telephone Number of the Private Body:
- 3.1.4. Email of the Information Officer: RicciM@lockton.com

3.2. Deputy Information Officer/s:

Rea Winter

- 3.2.1. Postal Address of Information Officer: PO Box 1317, Fourways, 2055.
- 3.2.2. Street Address the Private Body: The Crossing Office Park, 372 Main Road, Bryanston.
- 3.2.3. Telephone Number of the Private Body: 067 852 9852
- 3.2.4. Email of the Deputy Information Officer: ReaW@lockton.com

Sanelisiwe Mpofu

- 3.2.5. Postal Address of Information Officer: PO Box 1317, Fourways, 2055.
- 3.2.6. Street Address the Private Body: The Crossing Office Park, 372 Main Road, Bryanston.
- 3.2.7. Telephone Number of the Private Body: 082 788 2857
- 3.2.8. Email of the Deputy Information Officer: SaneM@lockton.com

PART A: PROMOTION OF ACCESS TO INFORMATION

4 GUIDE ON HOW TO EXERCISE RIGHTS IN TERMS OF PAIA

Section 51(1)(b)(i) of PAIA

- 4.1 In terms of section 10 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), a guide has been compiled by the Information Regulator (South Africa) to assist persons in exercising their rights under PAIA and the Protection of Personal Information Act 4 of 2013 ("POPIA").
- 4.2 The guide contains information on, inter alia:
- 4.2.1 the objects of PAIA and POPIA;
 - 4.2.2 the manner and form of requests for access to records held by public and private bodies;
 - 4.2.3 the assistance available from the Information Regulator;
 - 4.2.4 the remedies available in law in the event of a refusal of access; and
 - 4.2.5 the rights of data subjects in terms of POPIA.
- 4.3 The guide is available in each of the official languages and may be obtained in the following manner:
- 4.3.1 Website: <https://inforegulator.org.za>
 - 4.3.2 Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - 4.3.3 Postal address: P.O Box 31533, Braamfontein, Johannesburg, 2017
 - 4.3.4 Telephone: +27 10 023 5200
 - 4.3.5 Email: enquiries@inforegulator.org.za

5 **RECORDS AVAILABLE IN TERMS OF LEGISLATION OTHER THAN PAIA
AND POPI**
Section 51(1)(b)(iii) of PAIA

5.1 The Private Body holds records in accordance with various legislative requirements. Records required to be made available in terms of such legislation shall be made available in accordance with the provisions of PAIA.

The applicable legislation includes, but is not limited to, the following:

5.2 Corporate and commercial legislation

- 5.2.1 Companies Act 71 of 2008
- 5.2.2 Consumer Protection Act 68 of 2008

5.3 Taxation legislation

- 5.3.1 Income Tax Act 58 of 1962
- 5.3.2 Value Added Tax Act 89 of 1991

5.4 Employment and labour legislation

- 5.4.1 Labour Relations Act 66 of 1995
- 5.4.2 Basic Conditions of Employment Act 75 of 1997
- 5.4.3 Employment Equity Act 55 of 1998
- 5.4.4 Skills Development Levies Act 9 of 1999
- 5.4.5 Unemployment Insurance Act 63 of 2001

5.5 Financial services and insurance legislation

- 5.5.1 Financial Sector Regulation Act 9 of 2017
- 5.5.2 Financial Advisory and Intermediary Services Act 37 of 2002
- 5.5.3 Insurance Act 18 of 2017

5.6 Anti-money laundering and compliance

- 5.6.1 Financial Intelligence Centre Act 38 of 2001 (as amended)

5.7 Information and technology legislation

- 5.7.1 Electronic Communications and Transactions Act 25 of 2002
- 5.7.2 Electronic Communications Act 36 of 2005
- 5.7.3 Cybercrimes Act 19 of 2020

5.8 General and other applicable legislation

- 5.8.1 Prevention of Organised Crime Act 121 of 1998
- 5.8.2 Any other legislation applicable to the Private Body's operations from time to time

6 **DESCRIPTION OF SUBJECTS AND CATEGORIES OF RECORDS** –
Section 51(1)(b)(iv) of PAIA

- 6.1 The Private Body holds various records. The subjects on which the Private Body holds records and the categories of records held by the Private Body are reproduced in the tables below.
- 6.2 The listing of a category or subject matter in this manual does not guarantee access to such records. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA and other applicable legislation. A request for records shall be made as per section 7 of this manual.

RECORD SUBJECTS: INTERNAL ADMINISTRATION, COMPLIANCE AND MANAGEMENT	
<u>Categories of records held:</u>	
Records of the owners of the Private Body	
Records and minutes of the meetings of the owners and/or managers of the Private Body	
Resolutions of the owners and/or managers of the Private Body	
Agreements dealing with the internal arrangements between the owners and/or managers of the Private Body	
Records relating to the creation and/or registration of the Private Body	
Internal auditing and risk	
Legislative compliance	
Regulatory reports	

RECORD SUBJECTS: HUMAN RESOURCES
<u>Categories of records held:</u>
Any personal records provided to the Private Body by their employees
List of employees
Conditions of employment and other employee-related contractual and quasi-legal records
Employee tax and insurance fund information including unemployment insurance fund contributions, group life, disability and income protection
Pension and provident fund records
Health and Safety records
Internal evaluation records
Codes of conduct as well as the relevant disciplinary codes and procedures
All internal policies applicable and accessible to the employees
Any records a third party has provided to the Private Body about any of their employees
Other internal records and correspondence relating to employees

RECORD SUBJECTS: FINANCE	
<u>Categories of records held:</u>	
Financial statements and other accounting records	
Accounting reports	
Taxation records	
Debtors and creditors records	
Insurance records	
Banking statements	

RECORD SUBJECTS: CLIENT RECORDS
<u>Categories of records held:</u>
Any records a client has provided to the Private Body or a third party acting for or on behalf of the Private Body
Contractual information
Client needs assessments
Personal records of clients
Credit information and other research conducted in respect of clients
Any records a third party has provided to the Private Body about clients
Confidential, privileged, contractual and quasi-legal records of clients
Client evaluation records
Client profiling
Performance research conducted on behalf of clients or about clients
Client account numbers
Any records a third party has provided to the Private Body either directly or indirectly
Records generated by or within the Private Body pertaining to clients, including transactional records

RECORD SUBJECTS: SERVICE PROVIDERS, SUPPLIERS AND THIRD PARTIES
<u>Categories of records held:</u>
Any records a client has provided to the Private Body or a third party acting for or on behalf of the Private Body
Lists of service providers and suppliers
Service providers' and suppliers' terms and conditions
Records kept in respect of other third parties, including without limitation joint venture partners, which includes records, falling within the subjects contemplated in this part of the manual, which can be said to belong to the Private Body but which are held by such third party

RECORD SUBJECTS: ASSETS
<u>Categories of records held:</u>
Register of assets (movable or immovable)
Insurance records relating to the assets

RECORD SUBJECTS: OTHER RECORDS
<u>Categories of records held:</u>
Information relating to the Private Body' s own commercial activities
Research information belonging to the Private Body, whether carried out itself or commissioned from a third party
Environment and market information
Project management
Information technology including information systems, network security, software licenses, technology asset
Support services
Internal communication

7 REQUEST PROCEDURE AND FORM OF REQUEST FOR RECORDS

Section 51(1)(b)(ii) and applicable PAIA regulations

- 7.1 Any person who wishes to request access to a record of the Private Body must submit such request in writing in a manner that enables the Private Body to identify:
- 7.1.1 the record requested;
 - 7.1.2 the identity of the requester; and
 - 7.1.3 the form of access required.
- 7.2 Requests may be submitted through the following channels:
- 7.2.1 Email: Requests may be submitted to the designated Information Officer email address as set out in this manual;
 - 7.2.2 Online submission: Where available, through any electronic or web-based request platform provided by the Private Body;
 - 7.2.3 Physical submission: By delivering a written request to the registered address of the Private Body.
- 7.3 Notwithstanding paragraph 7.2, in order for the Private Body to formally recognise and process a request as a request in terms of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), the requester is required to submit the request using:
- 7.3.1 Form 2 (Request for Access to Record) as prescribed by the Information Regulator (South Africa); or
 - 7.3.2 a request in a substantially similar format containing all information required in terms of Form 2.
- 7.4 Where a request is submitted by email or other electronic means without using Form 2, the Private Body may:
- 7.4.1 request the requester to complete Form 2; or
 - 7.4.2 assist the requester to ensure that the request complies with the minimum prescribed requirements.
- 7.5 A request must be accompanied by:
- 7.5.1 adequate proof of identity of the requester; and

- 7.5.2 where applicable, proof of authority if the request is made on behalf of another person.
- 7.6 The request shall be submitted to the Information Officer or Deputy Information Officer of the Private Body.
- 7.7 The Private Body shall:
- 7.7.1 acknowledge receipt of the request;
 - 7.7.2 process the request in accordance with PAIA; and
 - 7.7.3 notify the requester of the outcome within the prescribed period of 30 (thirty) days, subject to any lawful extension.
- 7.8 If access is granted, access to the record will be provided in the manner requested, where reasonably possible.
- 7.9 If the request is refused, the Private Body shall provide written reasons for the refusal and inform the requester of their right to:
- 7.9.1 lodge a complaint with the Information Regulator (South Africa); or
 - 7.9.2 apply to a court of competent jurisdiction for appropriate relief.
- 7.10 A requester is encouraged to utilise the prescribed forms issued by the Information Regulator, which are available on its official website:
- <https://inforegulator.org.za>

8 FEES PRESCRIBED IN TERMS OF THE REGULATIONS

Section 51(1)(f) of PAIA and applicable regulations

- 8.1 The fees payable in respect of requests for access to records are prescribed in terms of regulations issued under the Promotion of Access to Information Act 2 of 2000 ("PAIA").
- 8.2 Fees are prescribed by regulation and may change from time to time. Requesters are advised to consult the latest fee schedule as published by the Information Regulator (South Africa).
- 8.3 The applicable fees may include, where relevant:
 - 8.3.1 a request fee, which is payable upon submission of a request (other than for personal requests);
 - 8.3.2 an access fee, which is payable for the reproduction, preparation, and/or search for the requested record; and
 - 8.3.3 a deposit, which may be required where the preparation of the record exceeds the prescribed time threshold.
- 8.4 The Private Body will notify the requester of:
 - 8.4.1 the applicable fees payable;
 - 8.4.2 the manner of payment; and
 - 8.4.3 whether a deposit is required prior to processing the request.
 - 8.4.4 Records may be withheld until the applicable fees have been paid in full.
- 8.5 A requester may lodge a complaint with the Information Regulator (South Africa) or apply to a court of competent jurisdiction where there is a dispute regarding:
 - 8.5.1 the payment of fees; or
 - 8.5.2 the amount of fees payable.
- 8.6 The latest prescribed fee structure is available from the Information Regulator and may be accessed on its official website:
<https://inforegulator.org.za>

PART B: PROTECTION OF PERSONAL INFORMATION

9 PROTECTION OF PERSONAL INFORMATION - Section 51(1)(c)(i)-(iii) of PAIA read with section 18 of the POPIA

- 9.1 The Private Body processes certain personal information, as defined in the POPIA, ("Personal Information") relating to several data subjects, from time to time. A data subject is the person, (natural or juristic), to whom Personal Information relates and from whom the Private Body collects and processes information.
- 9.2 A description of the data subjects, (individuals and juristic persons), the information relating thereto, the purpose of processing that information and the recipients of that Personal Information is reproduced in the tables below.

DATA SUBJECTS: EMPLOYEES		
<u>Personal Information processed:</u>	<u>Source of the Personal Information</u>	<u>Is the supply of Personal Information mandatory or voluntary?:</u>

DATA SUBJECTS: EMPLOYEES		
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	Employment Equity Forms	Mandatory
Will any of the Personal Information be transferred to another country or international organisation?		
No		
<u>Purpose of processing Personal Information:</u>		
Compliance		
<u>Recipient or categories of recipients to whom the Personal Information is supplied:</u>		
Department of Labour		
<u>The consequences of failure to provide information:</u>		
Non-compliance		

- 9.3 Where Personal Information is collected in terms of specific legislation, the Private Body will inform the data subject in terms of which legislation that data is collected.
- 9.4 Data subjects have the right to object to the processing of their Personal Information.
- 9.5 In the event a data subject requires confirmation regarding the existence of the Personal Information processed by the Private Body or believes that the Personal Information processed by the Private Body requires rectification, the data subject is entitled to utilise the processes and procedures set out in section A of this manual to request access to the records of the Private Body set out in section 18(1)(h)(iii).
- 9.6 We will not, without data subjects' express consent use their Personal Information for any purpose, other than:

specifically:

- 9.6.1 as set out in the abovementioned tables;

generally:

- 9.6.2 in relation to the provision of any goods and services to a data subject;
- 9.6.3 to inform the data subject of new features, special offers and promotional competitions offered by us or any of our divisions, affiliates and/or partners (unless they have opted out from receiving marketing material from us);
- 9.6.4 to improve our product and/or service selection and their experience on our website; or
- 9.6.5 to disclose their Personal Information to any third party as set out below:
- 9.6.5.1 to our employees and/or third party service providers who assist us to interact with data subjects via our website, for the ordering of goods or services or when delivering goods or services to data subjects, their personal and contact information being essential in order to assist us to communicate with the data subjects properly and efficiently;

- 9.6.5.2 to our divisions, affiliates and/or partners (including their employees and/or third party service providers) in order for them to interact directly with data subjects via email or any other method for purposes of sending data subjects marketing material regarding any current or new goods or services, new features, special offers or promotional items offered by them (unless the data subjects have opted out from receiving marketing material from us);
 - 9.6.5.3 to law enforcement, government officials, fraud detection agencies or other third parties when we believe in good faith that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, to report or support the investigation into suspected illegal activity;
 - 9.6.5.4 to our service providers (under contract with us) who help with parts of our business operations (fraud prevention, marketing, technology services etc). However, these service providers may only use data subjects information in connection with the services they perform for us and not for their own benefit;
 - 9.6.5.5 to our suppliers in order for them to liaise directly with data subject regarding any defective goods or services which requires their involvement;
 - 9.6.5.6 to any third-party seller for purposes of sending data subjects an invoice for any goods purchased from such third-party seller, which disclosed information will be limited to data subjects' email addresses;
- 9.7 We are entitled to use or disclose data subjects' Personal Information if such use or disclosure is required in order to comply with any applicable law, subpoena, order of court or legal process served on us, or to protect and defend our rights or property. In the event of a fraudulent online payment, we are entitled to disclose relevant Personal Information for criminal investigation purposes or in line with any other legal obligation for disclosure of the Personal Information which may be required of it.
- 9.8 Data subjects' privacy is important to us and we will therefore not sell, rent or provide their Personal Information to unauthorised third parties for their independent use, without their consent.
- 9.9 We will not process personal information concerning:

- 9.9.1 the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or
- 9.9.2 the criminal behaviour of a data subject to the extent that such information relates to i) the alleged commission by a data subject of any offence; or ii) any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

unless

- 9.9.2.1 the data subject has given us specific consent to process such data; or
 - 9.9.2.2 processing is necessary for the establishment, exercise or defence of a right or obligation in law;
 - 9.9.2.3 processing is necessary to comply with an obligation of international public law; or
 - 9.9.2.4 processing is for historical, statistical or research purposes to the extent that: (i) the purpose serves a public interest or (ii) requesting consent would constitute an unreasonable requirement in the circumstances.
- 9.10 In line with our obligations in terms of section 22 of the POPIA, where there are reasonable grounds to believe that Personal Information has been accessed or acquired by any unauthorised person, we will notify the Information Regulator and the data subject, where possible.
- 9.11 When data subjects provide a rating or review of our services and/or goods, they consent to us using that rating or review as we deem fit, including without limitation, on our website, in newsletters or other marketing material. The name that will appear next to that rating or review is their first name, as they would have provided. We will not display their surname, nor any of their contact details, with a rating or review.
- 9.12 We will:
- 9.12.1 treat data subjects' Personal Information as strictly confidential, save where we are entitled to share it as set out in this section;

- 9.12.2 take appropriate technical and organisational measures to ensure that data subjects' Personal Information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
 - 9.12.3 provide data subjects with access to their Personal Information to view and/or update personal details;
 - 9.12.4 promptly notify data subjects if we become aware of any unauthorised use, disclosure or processing of their Personal Information;
 - 9.12.5 provide data subjects with reasonable evidence of our compliance with our obligations under this section on reasonable notice and request; and
 - 9.12.6 upon data subjects request, promptly return or destroy any and all of their Personal Information in our possession or control, save for that which we are legally obliged to retain.
- 9.13 We will not retain data subjects' Personal Information longer than the period for which it was originally needed, unless we are required by law to do so, or they consent to us retaining such information for a longer period.
- 9.14 We undertake never to sell or make data subjects' Personal Information available to any third-party other than as provided for in this section.
- 9.15 Whilst we will do all things reasonably necessary to protect data subjects' rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of data subjects' Personal Information, whilst in our possession, made by third parties who are not subject to our direct control, unless such disclosure is as a result of our gross negligence.
- 9.16 Should a data subject believe that we have used their Personal Information contrary to this Manual and the provisions of the POPIA, the data subject should first attempt to resolve any concerns with us. If the data subject is not satisfied, they have the right to lodge a complaint with the Information Regulator (which address can be found herein below), established in terms of the POPIA.

10 **TRANSBORDER FLOWS OF PERSONAL INFORMATION** – (section 51(1)(iv) of PAIA and section 18(1)(g) of the POPIA.

10.1 The Private Body may from time to time need to transfer authorised Personal Information to another country for storage purposes or for the rendering of services by a foreign third-party service provider or otherwise. We will ensure that any person that we pass data subjects' Personal Information to agrees to treat their information with the same level of protection as we are obliged to in terms of section 72 of the POPIA.

11 **SECURITY MEASURES TO PROTECT PERSONAL INFORMATION** —
 Section 51(1)(v)

11.1 The security measures implemented by the Private Body to ensure the confidentiality, integrity and availability of Personal Information, are listed and described below:

<u>PHYSICAL SECURITY MEASURES:</u>	<u>CYBER SECURITY MEASURES:</u>
Access control to the premises and certain key areas, which access is restricted to authorised personnel	Firewalls
Devices and user stations are password protected	Virus protection

<u>PHYSICAL SECURITY MEASURES:</u>	<u>CYBER SECURITY MEASURES:</u>
Servers are stored in access-controlled rooms	Systems and devices are automatically locked after certain periods of inactivity
Security gate	Data is backed up
Cameras	
On site security guards	
Safe storage of physical documentation	
Discarded documentation is shredded	

12 **UPDATES TO THE MANUAL** – Section 51(2)

This manual will be reviewed and updated periodically, or as required by legislative or operational changes

SIGNED at Bryanston on the 01st day of April 2026



THE HEAD OF THE PRIVATE BODY