

# PAIA AND POPI MANUAL

## PAIA AND POPIA MANUAL

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This manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act no. 2 of 2000) (“the Act”) and to address the requirements of the Protection of Personal Information Act, 2013 (Act no. 4 of 2013).

The Act grants a requester access to records of a private body if the record is required for the exercise or protection of any rights.

Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided.

**The manual applies in respect of:**

Gap Infrastructure Corporation (Pty) Ltd  
Registration Number 2009/001909/07  
(the “Company”)  
(Including all Subsidiaries)

**Registered Office Address:**

35 Tegel Avenue  
Highveld, Centurion 0157  
PO Box 68329, Highveld  
0169

**TABLE OF CONTENTS**

1. List Of Abbreviation ..... 3

2. Introduction ..... 4

3. Purpose ..... 4

4. Background To Gap Infrastructure Corporation ..... 5

5. Information Required Under Section 51(1)(A) Of PAIA ..... 5

6. Description Of Guide Referred To In Section 10: Section 51(1)(B) ..... 6

7. Notice In Terms Of Section 52(2) ..... 6

8. Scope..... 6

9. Records Available In Terms Of Other Legislation: Section 51(1)(D) ..... 7

10. Records That Are Not Automatically Available ..... 8

11. Policy With Regard To Confidentiality, Access To Information And Processing Of Information ..... 8

12. Processing Of Personal Information ..... 9

13. Request Access Procedure ..... 11

    13.1. Request Procedure ..... 11

14. Prescribed Fees..... 12

15. Other Fees ..... 13

16. Grounds For Refusal Of Access To Records..... 13

17. Remedies Available When A Request Is Refused ..... 14

18. Complaints ..... 15

19. Updating Of The PAIA Manual..... 15

20. Reference ..... 15

**ANNEXURE A**..... 16

**ANNEXURE B**..... 18

**ANNEXURE C** ..... 21

**VERSION CONTROL** ..... 23

## 1. LIST OF ABBREVIATION

<b>ABBREVIATION / TERM</b>	<b>FULL MEANING / DESCRIPTION</b>
<b>Annexure A / B / C</b>	Supporting sections of this Manual that include prescribed fees, record categories, and POPIA compliance information
<b>B-BBEE</b>	Broad-Based Black Economic Empowerment
<b>COIDA</b>	Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
<b>Companies Act</b>	Companies Act, No. 71 of 2008
<b>Data Subject</b>	A natural or juristic person to whom personal information relates
<b>Deputy Information Officer (DIO)</b>	The designated deputy assisting the Information Officer with PAIA and POPIA functions
<b>Information Officer (IO)</b>	The individual appointed in terms of Section 51 of PAIA and Section 55 of POPIA, responsible for compliance with the Acts.
<b>Information Regulator</b>	The Information Regulator of South Africa established in terms of the Protection of Personal Information Act
<b>ISO/IEC</b>	International Organization for Standardization / International Electrotechnical Commission
<b>OHS Act</b>	Unemployment Insurance Fund
<b>PAIA</b>	Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)
<b>PAYE</b>	Pay As You Earn (Tax)
<b>Personal Information (PI)</b>	Information relating to an identifiable, living natural person or juristic person as defined under Section 1 of POPIA
<b>POPIA</b>	Protection of Personal Information Act, 2013 (Act No. 4 of 2013)
<b>Processing</b>	Any operation or activity concerning personal information, including collection, storage, dissemination, modification, or destruction
<b>Regulator's Guide</b>	The official guide compiled by the Information Regulator in terms of Section 10(1) of PAIA
<b>Responsible Party</b>	Any public or private body which determines the purpose and means for processing personal information.
<b>SARS</b>	South African Revenue Service
<b>SETA</b>	Sector Education and Training Authority
<b>the Act</b>	Refers to the Promotion of Access to Information Act (PAIA), unless otherwise indicated
<b>UIF</b>	Unemployment Insurance Fund
<b>VAT</b>	Value Added Tax

## **2. INTRODUCTION**

The Promotion of Access to Information Act, 2000 (the “PAIA Act”) gives effect to the provisions of Section 32 of the Constitution of the Republic of South Africa, 1996 (the “Constitution”), which provides for the right of access to information. The PAIA Act gives third parties the right to approach public and private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the public or private body or government is obliged to release such information unless the PAIA Act expressly states that the records containing such information may or must not be released.

The Protection to Personal Information Act, 4 of 2013 (the “POPI Act”) gives effect to the provisions of Section 14 of the Constitution provides that everyone has the right to privacy. The right to privacy includes a right to protection against the unlawful collection, retention, dissemination and use of Personal Information. A responsible party who processes Personal Information must notify the person to whom Personal Information relates (“Data Subject”) of the manner in which the Data Subject can access their Personal Information held by the Responsible Party.

## **3. PURPOSE**

The purpose of this Manual informs requestors of procedural and other requirements which a request must meet as prescribed by PAIA. The POPI Act gives Data Subjects the right to request a Responsible Party to correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of Personal Information about the Data Subject that the Responsible Party is no longer authorised to retain access and/or request the correction or deletion of any Personal Information held about them that may be inaccurate, misleading or outdated.

Gap Infrastructure Corporation (Pty) Ltd (“the company”) believes that this Manual will assist requestors in exercising their rights. The Acts seek, inter alia, to give effect to the constitutional right of access to any information held by the state or by any other person where such information is required for the exercise or protection of any right, as well as the right to privacy and protection of Personal Information.

This PAIA Manual was compiled in terms of Section 51 of PAIA Act and sections 23 to 25 of the POPI Act to facilitate access to records held by the company. It contains information required by a person wishing to exercise any right, contemplated by the PAIA Act. It is available in English.

A copy of this Manual is available to the public in a PDF (“Portable Document Format”) version on the company website or on request from the Information Officer referred to in this Manual in two official languages.

#### 4. BACKGROUND TO GAP INFRASTRUCTURE CORPORATION

The company has achieved a B-BBEE Level 1 status as active role players in the transformation of South Africa’s society and its economy. The company’s promise of “Changing Lives”, generates sustainable value in communities, and bettering the lives and livelihoods of South Africans and the environment in which they live. High value is placed on:

- a) High safety standards
- b) Training of staff and on-site workers
- c) The Occupational Health and Safety Act

This PAIA Manual of GAP Infrastructure Corporation is available at its premises upon request from the Information Officer.

#### 5. INFORMATION REQUIRED UNDER SECTION 51(1)(a) OF PAIA

The Act prescribes the appointment of an Information Officer where such Information Officer is responsible to, inter alia, assess requests for access to information. The head of a private body fulfils such a function in terms of section 51. The company appointed an Information Officer and Deputy Information Officers to assess requests for access to information as well as to oversee its required functions in terms of the Act.

<b>Name of Body</b>	Gap Infrastructure Corporation (Pty) Ltd
<b>Registration Number</b>	2009/001909/07
<b>Information Officer</b>	Carl Letswalo ( <i>Chief Commercial Officer</i> )
<b>Deputy Information Officer</b>	Kevin Mlangeni ( <i>Risk and Compliance Specialist</i> )
<b>Email Address</b>	<a href="mailto:informationofficer@gic.co.za">informationofficer@gic.co.za</a>
<b>Physical Address</b>	35 Tegel Avenue, Highveld, Centurion, 0157
<b>Postal Address</b>	Po Box 68329, Highveld, Gauteng, 0169
<b>Telephone Number</b>	+27 (0)12 881 0210
<b>Website</b>	<a href="http://www.gic.co.za">www.gic.co.za</a>

## 6. DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10: SECTION 51(1)(b)

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 the PAIA Act and the POPI Act. The Guide is available in each of the official languages and in braille, and can be obtained upon request to the Information Officer using “**PAIA Form 1**”, from the website of the Regulator, or by contacting the Information Regulator using any of the following means:

<b>Physical Location</b>	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 P.O. Box 31533, Braamfontein, Johannesburg, 2017
<b>Telephone</b>	010 023 5200 Toll Free: 0800 017 160
<b>Complaints</b>	<a href="mailto:POPIACompliants@info regulator.org.za">POPIACompliants@info regulator.org.za</a>
<b>Website</b>	<a href="https://info regulator.org.za/">https://info regulator.org.za/</a>
<b>Enquiries</b>	<a href="mailto:enquiries@info regulator.org.za">enquiries@info regulator.org.za</a>

A copy of the Guide is also available at the company’s registered office, in English and Afrikaans, for public inspection during normal office hours.

## 7. NOTICE IN TERMS OF SECTION 52(2)

Records That Will Be Available Without a Request to Access in Terms Of PAIA.

Records of a public nature, available in terms on the company’s websites and/or social media platforms as well as any other information that is by statute required to be public, may be accessed without the need for a formal application.

Other non-confidential records may be viewed by appointment with the Information Officer.

## 8. SCOPE

This Manual has been prepared in respect of the company, which is applicable to:

- a) Gap Infrastructure Corporation (Pty) Ltd.

## 9. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION: SECTION 51(1)(d)

Records are kept in accordance with such other legislation as applicable to the company, which includes, but is not limited to:

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
Auditor registration, accreditation, and reports	Auditing Professions Act, No 26 of 2005
Employment contracts, working hours, leave records	Basic Conditions of Employment Act, No 75 of 1997
Memorandum of Incorporation, shareholder registers, directors' records, annual returns	Companies Act, No 71 of 2008
Workplace injury and disease registers, compensation claims	Compensation for Occupational Injuries & Diseases Act, 130 of 1993
Foundational governance documents, Bill of Rights compliance policies	Constitution of the Republic of South Africa 2008
Telecommunications licences, network and broadcasting compliance records	Electronic Communications Act, No 36 of 2005
Electronic transaction records, digital signatures, e-commerce compliance policies	Electronic Communications and Transactions Act, No 25 of 2002
Employment equity plans, reports, workforce demographic data	Employment Equity Act, No 55 of 1998
Income tax returns, PAYE records, SARS submissions	Income Tax Act, No 58 of 1962
Disciplinary records, collective agreements, trade union recognition agreements	Labour Relations Act, No 66 of 1995
Health and safety policies, incident registers, risk assessments, Section 16(2) appointments	Occupational Health & Safety Act, No 85 of 1993
PAIA manual, records of information requests and disclosures	Promotion of Access to Information Act, No 2 of 2000
POPIA compliance manual, consent forms, personal information processing records, data breach logs	Protection of Personal Information Act, No. 4 of 2013
Skills development levy records, training reports, submissions to SETA	Skills Development Levies Act No. 9 of 1999

UIF contribution records, employee declarations, claims submitted	Unemployment Insurance Act No. 30 of 1966
VAT returns, input/output tax records, SARS submissions	Value Added Tax Act 89 of 1991

Such records will be made available to only those individuals/entities authorised to request access to such records in terms of the particular legislation. Any other persons must follow the request for access of records procedure as outlined in this Manual.

While the company has used its best endeavours to supply you with a list of applicable legislation, it is possible that the above list may be incomplete. Wherever it comes to the company’s attention that existing or new legislation allows a requestor access on a basis other than that set out in the PAIA or POPI Acts, we shall update the list accordingly.

A description of the subjects on which the company holds records and the categories of the records held can be found in “**Annexure B**” of this Manual, which forms an integral part of this Manual.

**10. RECORDS THAT ARE NOT AUTOMATICALLY AVAILABLE**

Records of the company which are not automatically available must be requested in terms of the procedure set out in this Manual, and the Regulations as set out in terms of the PAIA and POPI ACTs and which may be subject to the restrictions and right of refusal to access as prescribed.

Access to records may be subject to the grounds of refusal set out in this PAIA manual. Access to records of third parties will require permission from the third party concerned.

**11. POLICY WITH REGARD TO CONFIDENTIALITY, ACCESS TO INFORMATION AND PROCESSING OF INFORMATION**

The company will protect the confidentiality of information provided to it by third parties, subject to the company’s obligations to disclose information where we have a duty or a right to disclose in terms of law or industry codes, or where we believe it is necessary to protect our rights. If access is requested to a record that contains information about a third party, the company is obliged to attempt to contact such third party to inform him/her/it of the request.

The company will give the third party an opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted to the requestor or not.

## 12. PROCESSING OF PERSONAL INFORMATION

### (In Terms of The Protection of Personal Information Act (POPIA))

Although this PAIA Manual is published in terms of Section 51 of PAIA, the company has chosen to include this POPIA-aligned section to demonstrate our compliance with the lawful processing of personal information in terms of POPIA.

The company collects and uses Personal Information of the individuals and corporate entities with whom it works in order to operate and carry out its business effectively, and this may include but is not limited to, Personal Information of employees, contractors, vendors, suppliers, and service providers.

Refer to the Privacy Policy published on the company’s website for more information about how the company processes Personal Information. the company’s Privacy Policy is available from <https://www.gic.co.za/legal-information/> and incorporated by reference herein in **Annexure C**.

### Description Of the Categories of Data Subjects and of the Information or Categories of Information Relating Thereto

The company may use or process any goods or services information, or optional information that you provide to the company for the purposes that you indicated when you agreed to provide it. Processing includes gathering Personal Information, disclosing it, and combining it with other Personal Information.

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION THAT MAY BE PROCESSED
Customers or clients	Name, address, registration numbers or identity numbers, contact numbers, director’s information, bank details, VAT numbers
Contractors, Vendors, Service Providers	Company name, representative name(s) and contact information, registration number, VAT number, address, trade secrets and bank details
Employees or job applicants, directors and shareholders	Name, address, contact information, qualifications, gender and race, curriculum vitae
Visitors	Name, company name, contact information, CCTV footage
Community Stakeholders	Name, address, registration numbers or identity numbers, contact numbers

### General Description of Information Security Measures

The company has implemented good governance processes and procedures including implementing an Information Security Management System aligned to ISO/IEC 27001 and its related ISO/IEC 27002 guidelines.

**Such measures include, but is not limited to:**

- Information Security Policies
- Incident Management Policies and Procedures
- Access And Network Access Controls
- Data Breach Reporting and Notification Procedures
- Management Of Privileged Access Controls
- Backup And Disaster Recovery Plans
- Endpoint Protection Controls
- Capacity Management Controls
- Encryption Controls
- Change Control Procedures
- Information Identification and Classification Controls
- Numerous Other Information and Cyber-Security Measures
- Mobile Device and Remote Access Controls

The company continuously implements and monitors technical and organisational security measures to protect the Personal Information it holds against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

### Security Compromises and Breach Notifications Procedure (POPIA Section 22)

In accordance with Section 22 of the Protection of Personal Information Act (POPIA), the company is committed to notifying affected Data Subjects and the Information Regulator in the event of a security compromise where there are reasonable grounds to believe that unauthorised access to, or acquisition of, personal information has occurred.

Should a data breach occur:

- a) The Information Officer will assess the scope and impact of the breach.
- b) A notification will be sent to the affected Data Subject(s) as soon as reasonably possible, describing:
  - The nature of the compromise;
  - The personal information affected;
  - Steps the company has taken or intends to take to address the breach;
  - Measures Data Subjects should take to mitigate potential harm;

- Contact details of the Information Officer for further queries.
- c) The Information Regulator will be notified as required under Section 22(2) of POPIA. Notifications may be provided via email, physical letter, telephone, or public communication, depending on what is most appropriate under the circumstances.

## 13. REQUEST ACCESS PROCEDURE

### 13.1. Request Procedure

- a) Please be aware that the company is concerned about protecting the private and/or confidential information of its Data Subjects. Please motivate any request for Personal Information very carefully, having regard to the POPI Act and the right that the requestor may rely upon. A request will not automatically be granted and short reasons for the refusal shall be supplied.
- b) Any person making a request for access to records of the company is referred to as a “requestor”
- c) The Requester must comply with all the procedural requirements relating to the request for access to a record.
- d) The requestor must complete the prescribed application form “**PAIA Form 2**” and submit the form as well as payment of the request fee and a deposit, if applicable, to the Information Officer of the company at the postal or physical or electronic mail address as stated in section 4 of this Manual.
- e) The prescribed form must be filled in with sufficient particulars to at least enable the Information Officer of the company to identify:
  - record or records requested.
  - identity of the requestor.
  - which form of access is required, if the request is granted; and
  - postal address, telephone number and fax number of the requestor.
- f) The Requester must state that he/she requires the information in order to exercise or protect a right and clearly state what the nature of the right is so to be exercised or protected.
- g) The company will acknowledge receipt of the request within **14 (fourteen) days** and will process and respond within **30 (thirty) days**. Should a deviation from this time period be required, a separate written motivation must be submitted.
- h) The Requester shall be advised in writing whether access is granted or denied. In the event where access to record is denied, reasons must be submitted in writing to the Requester.

- i) If a request is made on behalf of another person, then the Requester must submit proof of the capacity in which the request is made.
- j) If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- k) If applicable, the prescribed fee must be paid, before any further processing can take place.
- l) Failure to provide all information required may result in a delay to consider the request for access to information. The prescribed time periods will not commence until the Requester has furnished all the necessary and required information.

#### **14. PRESCRIBED FEES**

- a) The Act provides for two types of fees, namely:
  - A request fee, which will be a standard fee; and
  - An access fee, which must be calculated by considering reproduction costs, search and preparation time and costs, as well as postal costs.
- b) When the request is received, the Information Officer, shall by notice require the requester, other than a personal requester, to pay the prescribed request fee **“PAIA Form 3”**, if any, before further processing of the request.
- c) If a requestor requires access to records of his/her Personal Information, there shall be no request fee payable. However, the requestor must pay the prescribed access and reproduction fees for such Personal Information.
- d) If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit for the prescribed portion of the access fee which would be payable if the request is granted.
- e) The Information Officer shall withhold a record until the Requester has paid the fees as indicated in **“PAIA Form 3”**. For more information on the current Prescribed Fee structure, please refer to **“Annexure A”** of this Manual.
- f) A Requester whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.
- g) If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer

concerned must repay the deposit to the Requester.

## 15. OTHER FEES

The following requests are not subject to fees, prescribed or otherwise:

- a) Objection to the Processing of Personal Information.
- b) Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information; and
- c) Complaint Regarding Interference with the Protection of Personal Information.

## 16. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

### In Terms of Section 62-72 of The Act

- a) The company has the right to refuse access to information on legal grounds as set out in POPI Act and in PAIA Act, chapter 4 section 62 to 70 and the outcome recorded on **“PAIA Form 3”**.
- b) The grounds to refuse a request for information include:
  - mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic person, as included in the Protection of Personal Information Act 4 of 2013, which would involve the unreasonable disclosure of personal information of that natural or juristic person.
  - mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of the Protection of Personal Information Act 4 of 2013.
  - mandatory protection of the commercial information of a third party, if the record contains:
    - trade secrets of the third party.
    - financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party.
    - information disclosed in confidence by a third party to the company, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
    - mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- c) mandatory protection of the safety of individuals and the protection of property.
- d) mandatory protection of records which would be regarded as privileged in legal proceedings.
- e) The commercial activities of the company may include:
  - trade secrets.
  - financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the company;

- information which, if disclosed could put the company at a disadvantage in negotiations or commercial competition;
  - any computer program which is owned by the company, and which is protected by copyright;
  - research information of the company or a third party, if its disclosure would disclose the identity of the company, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- f) Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.
- g) All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.
- h) If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

## **17. REMEDIES AVAILABLE WHEN A REQUEST IS REFUSED**

### **a) Internal Remedies:**

The company does not have internal appeal procedures. The decision made by the Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.

### **b) External Remedies:**

A Requestor that is dissatisfied with the Information Officer's refusal to disclose information, may in accordance with the applicable Rules apply to a Court for relief.

A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief. For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

## 18. COMPLAINTS

We kindly request that any complaints regarding a PAIA or POPIA request first be addressed to the company’s Information Officer at the contact details provided in section 4 of this Manual, however, as a requestor you have a right to complain about the outcome of your request.

A complaint contemplated in terms of section 77 of the PAIA Act may be lodged in writing to the Information Regulator on “**PAIA Form 5**”, and a complaint contemplated in terms of section 74 of the POPI Act may be lodged in writing to the Information Regulator on “**POPIA Form 5**”. The Information Regulator’s contact information is provided in section 6 of this Manual.

## 19. UPDATING OF THE PAIA MANUAL

The Information Officer/Deputy Information Officer of Gap Infrastructure Corporation will on a regular basis update the Manual.

This PAIA Manual is available to view at the premises of the company and on its website.

<b>ANNEXURE OF FORMS</b>	
<b>Annexure A</b>	Fees in respect to access and reproduction of records
<b>Annexure B</b>	Subjects and categories of records held by the company
<b>Annexure C</b>	Processing of personal information in terms of the protection of personal information act (POPIA)
<b>PAIA Forms</b>	
<b>Form 1</b>	Request for a Copy of the Guide from an Information Officer (Regulations 3)
<b>Form 2</b>	Request for Access to Record (Regulation 7)
<b>Form 3</b>	Outcome of request and of fees payable (Regulation 8)
<b>Form 5</b>	Complaint Form (Regulation 10)
<b>POIA Forms</b>	
<b>Form 1</b>	Objection to Processing of Personal Information
<b>Form 2</b>	Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information
<b>Form 5</b>	Complaint Regarding Interference with the Protection of Personal Information/Complaint Regarding Determination of an Adjudicator

## 20. REFERENCE

- <https://www.gic.co.za/legal-information/> (for additional detail on data handling and retention)

## ANNEXURE A

### FEES IN RESPECT TO ACCESS AND REPRODUCTION OF RECORDS

In the event of a request for information that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

<b>REQUEST FEE</b>	
The request fee payable by every request	R100.00
<b>ACCESS/REPRODUCTION FEE</b>	
For every black and white photocopy of an A4-size page	R2.00 per page
For every printed copy of an A4-size page held on a computer or in electronic or machine-readable form	R2.00 per page
<b>For a copy in a computer- readable form on:</b>	
(i) Flash drive • To be provided by requestor	R40.00
(ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R60.00
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider
Transcription of an audio record, per A4-size	R24.00
<b>Copy of an audio record</b>	
(i) Flash drive • To be provided by requestor	R40.00
(ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 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.	R130.00 (to not exceed a total cost of R400.00)
Deposit: (If search exceeds 6 hours)	1/3 of the amount per request calculated in terms of the above.
Postage, e-mail or any other electronic transfer:	Actual costs, if any

Requestors who are also Data Subjects may request whether the company holds any of their Personal Information free of charge and without needing to submit a formal request in terms of PAIA.

## ANNEXURE B

### SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE COMPANY: SECTION 51(1)(e)

The list(s) below depict records of information which the company has available in terms of laws applicable to it and its subsidiary companies listed under section 8 above (jointly referred to as the company).

SUBJECT	CATEGORY (ANNEXURE)
<b>Companies Act Records</b>	Documents of Incorporation. Index of names of Directors. Memorandum of Incorporation. Minutes of meetings of the Board of Directors. Minutes of meetings of Shareholders. Register of shareholdings. Share certificates. Share Register and other statutory registers and/or records and/or documents. Records relating to appointments in terms of the company's Ac of South Africa.
<b>Financial Records</b>	Accounting Records. Annual Financial Reports. Annual Financial Statements. Asset Registers. Bank Statements. Banking details and bank accounts. Banking Records. Debtors / Creditors statements and invoices. General ledgers and subsidiary ledgers. General reconciliation. Invoices. Records of payments. Policies and procedures. Rental Agreements. Tax Returns. Audit reports.

<p><b>South African Revenue Services Records</b></p>	<p>PAYE Records. Documents issued to employees for income tax purposes; Records of payments made to SARS on behalf of employees.  All other statutory compliances: VAT. Regional Services Levies. Skills Development Levies UIF. Workmen’s Compensation.</p>
<p><b>Personnel Documents and Records</b></p>	<p>Disciplinary Code and Records. Employment Contracts. Employment Equity Plan. Forms and Applications. Grievance Procedures. Leave Records. Medical Aid Records. Payroll reports/ Wage register. Pension Fund Records. Safety, Health and Environmental records. Salary Records. SETA records. Standard letters and notices. Training Manuals. Training Records. Workplace and Union agreements and records.</p>
<p><b>Procurement</b></p>	<p>Procurement Policies and Procedures. Contractor, client and supplier agreements. Lists of suppliers, products, services and distribution. Customer details. Credit application information. Information and records provided by a third party.</p>
<p><b>Marketing</b></p>	<p>Advertising and promotional material.</p>
<p><b>Occupational Health and Safety,</b></p>	<p>All health and safety records.</p>

<b>Information Technology</b>	Computer / mobile device usage policies/procedures Information security policies/standards/procedures. Information technology systems and user manuals Information usage policy documentation. Software licensing. System documentation and manuals.
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## **ANNEXURE C**

### **PROCESSING OF PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT (POPIA)**

1. Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.
2. The manner in which this information is processed and the purpose for which it is processed will be determined by the provisions of the Protection of Personal Information Act and the company is committed to ensure that personal information:
  - 2.1. Is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected;
  - 2.2. is processed only for the purposes for which it was collected;
  - 2.3. will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
  - 2.4. is adequate, relevant and not excessive for the purposes for which it was collected;
  - 2.5. is accurate and kept up to date;
  - 2.6. will not be kept for longer than necessary;
  - 2.7. is processed in accordance with integrity and confidentiality principles
  - 2.8. is processed in accordance with the rights of Data Subjects, where applicable.
3. Data Subjects have the right to:
  - 3.1. be notified that their Personal Information is being collected by the company. The Data Subject also has the right to be notified in the event of a data breach;
  - 3.2. know whether the company holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
  - 3.3. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
  - 3.4. object to the company's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the company's record keeping requirements);
  - 3.5. object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
  - 3.6. complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPI and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

4. Purpose of the Processing of Personal Information by the company: Personal Information may only be processed for a specific purpose.
5. Categories of Data Subjects and Personal Information/special Personal Information relating thereto. A Data Subject may either be a natural or a juristic person as set out in the Protection of Personal Information Act.
6. Cross-border flows of Personal Information
  - 6.1. Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:
    - recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPI; or
    - Data Subject consents to the transfer of their Personal Information; or
    - transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
    - transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
    - the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.
7. Description of information security measures to be implemented by the company:

Security measures to be implemented in order to ensure that Personal Information is respected and protected are outlined in this Manual. A preliminary assessment of the suitability of the information security measures implemented or to be implemented may be conducted in order to ensure that the Personal Information that is processed is safeguarded and processed in accordance with the Conditions for Lawful Processing.
8. Objection to the Processing of Personal Information by a Data Subject:

Section 11 (3) of POPI and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual.
9. Request for correction or deletion of Personal Information

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/deleted in the prescribed form attached to this Manual.

## VERSION CONTROL

Version	Date Approved	Description of Change	Approved By	Signature
1.0	15 October 2025	First Initial Document	Information Officer	