
DAVID HELLIG AND ABRAHAMSE
PROTECTION OF PERSONAL INFORMATION POLICY AND RELATED POLICIES AND
DOCUMENTS

TABLE OF CONTENTS

Clause number and description	Page
1. DATA PROTECTION POLICY	3
2. WEBSITE PRIVACY POLICY	17
3. EXTERNAL PRIVACY STATEMENT	22
4. STANDARD OPERATOR CLAUSES.....	30
5. MODEL POPIA CONSENT CLAUSES	32
6. PROTECTION OF PERSONAL INFORMATION ACT COMPLIANCE SURVEY	34
7. THE PROMOTION OF ACCESS TO INFORMATION MANUAL.....	39

1. **DATA PROTECTION POLICY**

DAVID HELLIG AND ABRAHAMSE

DATA PROTECTION POLICY

1. POLICY STATEMENT

- 1.1. Everyone has rights with regard to how their personal information is handled. During the course of its activities DAVID HELLIG AND ABRAHAMSE will collect, store and process personal information about DAVID HELLIG AND ABRAHAMSE staff, customers, suppliers and other third parties. DAVID HELLIG AND ABRAHAMSE recognises the need to treat it in an appropriate and lawful manner.
- 1.2. **Any breach of this policy amounts to serious misconduct and may result in disciplinary action.**

2. RELEVANT DEFINITIONS

- 2.1. The following terms bear the meaning given to them here in this policy and its annexures:
 - 2.1. **"Data subjects"** for the purpose of this policy include all living individuals and juristic persons about whom DAVID HELLIG AND ABRAHAMSE holds personal information. All data subjects have legal rights in relation to their personal information.
 - 2.1. **"IO"** means the information officer appointed as such by DAVID HELLIG AND ABRAHAMSE in terms of section 56 of POPIA and who will have the ultimate responsibility to ensure that DAVID HELLIG AND ABRAHAMSE complies with the provisions of POPIA.
 - 2.1. **"Operators"** include any person who processes personal information on behalf of a responsible party. Employees of responsible parties are excluded from this definition but it could include suppliers which handle personal information DAVID HELLIG AND ABRAHAMSE's behalf.
 - 2.1. **"Personal information"** means information relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person.
 - 2.1. **"POPIA"** means the Protection of Personal Information Act 4 of 2013.
 - 2.1. **"Processing"** is any activity that involves use of personal information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- 2.1.6.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 2.1.6.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 2.1.6.3. merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 2.1. **"Processing conditions"** are the 8 (eight) conditions for the lawful processing of personal information set out in chapter 3 of POPIA.
- 2.1. **"Regulator"** means the Information Regulator established in terms of section 39 of POPIA.
- 2.1. **"Responsible parties"** are the people who or organisations which determine the purposes for which, and the manner in which, any personal information is processed. They have a responsibility to establish practices and policies in line with POPIA. DAVID HELLIG AND ABRAHAMSE is the responsible party of all personal information used in its business.
- 2.1. **"Special personal information"** includes personal information concerning 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 the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence; or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.
- 2.1. **"Users"** include employees whose work involves using personal information. Users have a duty to protect the information they handle by following DAVID HELLIG AND ABRAHAMSE data privacy and data protection policies at all times.

3. **ABOUT THIS POLICY**

- 3.1. This policy applies to all users and will come into effect when POPIA becomes fully effective.
- 3.2. The types of information that DAVID HELLIG AND ABRAHAMSE may be required to handle include details of current, past and prospective employees, clients, suppliers, and others that DAVID HELLIG AND ABRAHAMSE deals with. The information, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in POPIA and other regulations. POPIA imposes restrictions on DAVID HELLIG AND ABRAHAMSE may use that information.

- 3.3. POPIA applies to the automated or non-automated processing of personal information entered into a record in any form (provided that when the recorded personal information is processed by non-automated means, it forms part of a filing system or is intended to form part thereof) by or for DAVID HELLIG AND ABRAHAMSE
- 3.4. This policy sets out DAVID HELLIG AND ABRAHAMSE's rules on personal information protection and the legal conditions that must be satisfied in relation to the obtaining, handling, processing, storage, transportation and destruction of personal information.
- 3.5. This policy does not form part of any employee's contract of employment and may be amended at any time.
- 3.6. The IO is responsible for ensuring compliance with POPIA and with this policy. That post is held by BRYAN JAMES HANSEN, 021 426 2613, BRYAN@DHAA.CO.ZA. Any questions or concerns about the operation of this policy should be referred in the first instance to the IO.
- 3.7. If you consider that the policy has not been followed in respect of personal information about yourself or others you should raise the matter with your line manager or the IO.

4. **PURPOSE OF THE POLICY**

- 4.1. The purpose of the policy is to establish management direction and high-level objectives for regulating the manner in which personal information is processed and to provide for remedies in cases where personal information is not handled accordingly. Further purposes of the policy include:
 - 4.1. the supplementation of DAVID HELLIG AND ABRAHAMSE policies and to align it with South African laws;
 - 4.1. compliance with the requirements of POPIA;
 - 4.1. the identification and codification of documents and ensuring adequate protection and maintenance of accuracy of documents where required;
 - 4.1. providing a set framework and unified policy regarding the methods and procedures for the retention and destruction of documents;
 - 4.1. ensuring records that are no longer required or documents that are of no value are destroyed properly and in accordance with the data retention schedule; and
 - 4.1. providing assistance to employees in understanding the requirements relating to the protection of personal information and the retention and destruction of documents.

- 4.2. Anyone processing personal information must comply with the following eight processing conditions:

5. **PROCESSING CONDITIONS**

- 5.1. The 8 Processing Conditions include:

- 5.1. Condition 1: Accountability;
- 5.1. Condition 2: Processing Limitation;
- 5.1. Condition 3: Purpose Specification;
- 5.1. Condition 4: Further Processing Limitation;
- 5.1. Condition 5: Information Quality;
- 5.1. Condition 6: Openness;
- 5.1. Condition 7: Security Safeguards; and
- 5.1. Condition 8: Data Subject Participation.

5.2. **Condition 1: Accountability**

- 5.2. DAVID HELLIG AND ABRAHAMSE must ensure that the processing conditions are complied with.¹
- 5.2. DAVID HELLIG AND ABRAHAMSE has appointed an IO to encourage and support DAVID HELLIG AND ABRAHAMSE overall compliance with POPIA.
- 5.2. The IO is responsible for implementing personal information security measures, which will, among other things, address document retention, access to information and classification of data.
- 5.2. DAVID HELLIG AND ABRAHAMSE will furthermore designate specific individuals to monitor compliance with information security standards within each business area.
- 5.2. Training or awareness sessions for employees on information security will be conducted on a regular basis.

5.3. **Condition 2: Processing limitation**

¹ See section 6 of POPIA.

- 5.3. Personal information may only be processed lawfully and in a manner that does not infringe on the privacy of a data subject.²
- 5.3. Personal information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.³
- 5.3. There are a number of grounds that DAVID HELLIG AND ABRAHAMSE may use in order to process personal information, please consult the IO when you collect any new type of personal information.
- 5.3. It is advisable to obtain voluntary, informed and specific consent from data subjects, where possible, before collecting their personal information.
- 5.3. A data subject may withdraw consent at any time and such withdrawal of consent should be noted. A data subject may also object at any time on reasonable grounds, to the processing of its personal information, save if other legislation provides for such processing. DAVID HELLIG AND ABRAHAMSE may then no longer process the personal information, unless they have another lawful justification for doing so.
- 5.3. Generally, personal information must be collected from the data subject directly except in certain circumstances which may include if the data subject has made personal information public or if collection from another source is necessary.⁴

5.4. **Condition 3: Purpose specification**

- 5.4. Personal information may only be collected for specific, explicitly defined and lawful reasons relating to the functions or activities of DAVID HELLIG AND ABRAHAMSE, of which the data subject is made aware.⁵
- 5.4. Personal information will only be collected to the extent that it is required for the specific purpose notified to the data subject. Any personal information which is not necessary for that purpose will not be collected in the first place.
- 5.4. Once collected, personal information will only be processed for the specific purposes notified to the data subject when the personal information was first collected or for any other purposes specifically permitted by POPIA. This means that personal information will not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the personal

² See section 9 of POPIA

³ See section 10 of POPIA.

⁴ See section 12 of POPIA.

⁵ See section 13 of POPIA.

information is processed, the data subject will be informed of the new purpose before any processing occurs.

5.4. Records of personal information may only be kept for as long as necessary for achieving the purpose for which the information was collected or subsequently processed, unless⁶

5.4.40.1. retention of the record is required or authorised by law;

5.4.40.2. the responsible party reasonably requires the record for lawful purposes related to its functions or activities;

5.4.40.3. retention of the record is required by a contract between the parties thereto; or

5.4.40.4. the data subject or a competent person where the data subject is a child has consented to the retention of the record.

5.4. Personal information will therefore not be kept longer than is necessary for the purpose for which it was collected. This means that personal information must be destroyed or deleted in a manner that prevents its reconstruction in an intelligible form or be de-identified as soon as reasonably practicable after DAVID HELLIG AND ABRAHAMSE is no longer authorised to retain the record. For guidance on how long certain personal information is likely to be kept before being destroyed, contact the IO.

5.5. **Condition 4: Further processing limitation**

5.5. Further processing of personal information must be compatible with purpose of collection, unless the data subject has consented to such further processing.⁷

5.5. Where personal information is transferred to a third party for further processing, the further processing must be compatible with the purpose for which it was initially collected, unless the data subject has consented to such further processing or it is permitted in terms of POPIA.

5.5. If personal information is to be used for any other purpose the further consent of the data subject must be obtained. Where this is not possible, the IO should be consulted.

5.6. **Condition 5: Information quality**

⁶ See section 14 of POPIA.

⁷ See section 15 of POPIA.

- 5.6. DAVID HELLIG AND ABRAHAMSE must take reasonably practicable steps to ensure that personal information is complete, accurate, not misleading and updated where necessary in light of the purpose for which such information is collected.⁸
- 5.6. Information which is incorrect or misleading is not accurate and steps will therefore be taken to check the accuracy of any personal information at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date information will be destroyed.
- 5.6. The IO will develop processes for:
- 5.6.47.1. checking the accuracy and completeness of records containing personal information;
 - 5.6.47.2. dealing with complaints relating to the timeliness and accuracy of personal information;
 - 5.6.47.3. individuals to periodically verify and update their personal information;
 - 5.6.47.4. making individuals aware of these processes; and
 - 5.6.47.5. monitoring and tracking updates to personal information.
- 5.6. The IO will furthermore put procedures in place to verify that records containing personal information remain relevant, accurate and up-to-date.

5.7. Condition 6: Openness

- 5.7. DAVID HELLIG AND ABRAHAMSE must take reasonably practicable steps to ensure that the data subject is aware of⁹:
- 5.7.49.1. the information being collected and where the information is not collected from the data subject, the source from which it is collected;
 - 5.7.49.2. the names and addresses of DAVID HELLIG AND ABRAHAMSE;
 - 5.7.49.3. the purpose for which the information is being collected;
 - 5.7.49.4. whether or not the supply of the information by that data subject is voluntary or mandatory;

⁸ See section 16 of POPIA.

⁹ See section 18 of POPIA.

- 5.7.49.5. the consequences of failure to provide the information;
 - 5.7.49.6. any particular law authorising or requiring the collection of the information;
 - 5.7.49.7. where applicable, the fact that the responsible party intends to transfer the information to a country or international organisation and the level of protection afforded to the information by that country or international organisation;
 - 5.7.49.8. any further information such as the recipient or category of recipients of the information, the nature or category of the information and the existence of the right of access to and the right to rectify the information collected;
 - 5.7.49.9. the existence of the right to object to the processing of personal information; and
 - 5.7.49.10. the right to lodge a complaint to the Regulator and the contact details of the Regulator,
- 5.7. which is necessary, having regard to the specific circumstances in which the information is or is not to be processed, to enable processing in respect of the data subject to be reasonable.
- 5.7. By law all organisations in South Africa are required to have a PAIA manual which will outline to the public:
- 5.7.51.1. categories of personal information collected by DAVID HELLIG AND ABRAHAMSE;
 - 5.7.51.2. purpose of processing personal information DAVID HELLIG AND ABRAHAMSE;
 - 5.7.51.3. description of the categories of data subjects and of the information or categories of information relating thereto;
 - 5.7.51.4. the recipients or categories of recipients to whom the personal information may be supplied;
 - 5.7.51.5. planned transborder flows of personal information; and
 - 5.7.51.6. a general description of information security measures to be implemented by DAVID HELLIG AND ABRAHAMSE.

5.8. **Condition 7: Security safeguards**

5.8. DAVID HELLIG AND ABRAHAMSE will keep all personal information secure against the risk of loss, unauthorised access, interference, modification, destruction or disclosure and conduct regular risk assessments to identify and manage all reasonably foreseeable internal and external risks to personal information under its control.

5.8. DAVID HELLIG AND ABRAHAMSE will secure the integrity of the personal information under DAVID HELLIG AND ABRAHAMSE control.

Duty in Respect of Operators

5.8. Operators (i.e. third parties which may process personal information on behalf of DAVID HELLIG AND ABRAHAMSE) include call centres, outsourced payroll administrators, marketing database companies, recruitment agencies, psychometric assessment centres, document management warehouses, external consultants and software providers.

5.8. DAVID HELLIG AND ABRAHAMSE will implement the following key obligations in respect of operators:

5.8.55.1. The operator may not process personal information on behalf of DAVID HELLIG AND ABRAHAMSE without the knowledge and authorisation of DAVID HELLIG AND ABRAHAMSE.

5.8.55.2. DAVID HELLIG AND ABRAHAMSE will ensure that the operator implements the security measures required in terms of Condition 7: Security Safeguards;

5.8.55.3. There will be a written contract in place between DAVID HELLIG AND ABRAHAMSE and the operator which requires the operator to maintain the confidentiality and integrity of personal information processed on behalf of DAVID HELLIG AND ABRAHAMSE; and

5.8.55.4. If the third party is located outside of South Africa, DAVID HELLIG AND ABRAHAMSE will comply with the requirements in POPIA in respect of transborder transfers of personal information.

Duties in Respect of Security Compromises

5.8. In the event that personal information has been compromised, or if there is a reasonable belief that a compromise has occurred, DAVID HELLIG AND

ABRAHAMSE (or an operator processing personal information on its behalf) will notify the Information Regulator and the relevant data subjects (if their contact details are available).

5.9. **Condition 8: Data subject participation**

Request for Information

5.9. DAVID HELLIG AND ABRAHAMSE recognises that a data subject has the right to request DAVID HELLIG AND ABRAHAMSE to confirm, free of charge, whether or not it holds personal information about the data subject and request DAVID HELLIG AND ABRAHAMSE to provide a record or a description of the personal information held, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information at a prescribed fee.¹⁰

5.9. All users will comply with DAVID HELLIG AND ABRAHAMSE's subject access request policy and PAIA manual in respect of any access to personal information requests by data subjects.

Request to Correct or Delete

5.9. The data subject may request the IO to:

5.9.59.1. correct or delete personal information relating to the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, misleading or obtained unlawfully; or

5.9.59.2. destroy or delete a record of personal information about the data subject that DAVID HELLIG AND ABRAHAMSE is no longer authorised to retain.

5.9. DAVID HELLIG AND ABRAHAMSE will provide credible proof to the individual of the action that has been taken in response to the request.

5.10. If any changes to the personal information will have an impact on any decisions to be made about the individual, DAVID HELLIG AND ABRAHAMSE will inform all third parties to whom the information has been disclosed, including any credit bureaus, of such changes.

6. **FAIR AND LAWFUL PROCESSING**

¹⁰ See section 23 of POPI.

- 6.1. POPIA is intended not to prevent the processing of personal information, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.
- 6.2. For personal information to be processed lawfully, certain requirements have to be met. These may include, among other things, requirements that the data subject has consented to the processing, or that the processing is necessary for the legitimate interest of the responsible party or the party to whom the personal information is disclosed. In most cases when special personal information is being processed, the data subject's explicit consent to the processing of such information will be required.
- 6.3. Personal information about users may be processed for legal, personnel, administrative and management purposes and to enable the responsible party (i.e. DAVID HELLIG AND ABRAHAMSE) to meet its legal obligations as an employer, for example to pay users, monitor their performance and to confer benefits in connection with their employment. Examples of when special personal information of users is likely to be processed are set out below:
- 6.3. information about an employee's physical or mental health or condition in order to monitor sick leave and take decisions as to the employee's fitness for work;
 - 6.3. the employee's racial or ethnic origin or religious or similar information in order to monitor compliance with employment equity legislation; and
 - 6.3. in order to comply with legal requirements and obligations to third parties.
- 6.4. Personal information about customers, suppliers and other third parties may be processed for the purposes set out in DAVID HELLIG AND ABRAHAMSE's PAIA manual.

7. **TRANSBORDER TRANSFERS OF PERSONAL INFORMATION**

DAVID HELLIG AND ABRAHAMSE may not transfer personal information about a data subject to a third party who is in a foreign country unless:¹¹

- 7.1. the third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection that:
- 7.1. effectively upholds principles for reasonable processing of the information that are substantially similar to Processing Conditions; and
 - 7.1. includes provisions, that are substantially similar to those of POPIA, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country;

¹¹ See section 72 of POPIA.

- 7.2. the data subject consents to the transfer;
- 7.3. the transfer is necessary for the performance of a contract between the data subject and the responsible party, or for the implementation of pre-contractual measures taken in response to the data subject's request;
- 7.4. the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the responsible party and a third party; or
- 7.5. the transfer is for the benefit of the data subject, and:
 - 7.5. it is not reasonably practicable to obtain the consent of the data subject to that transfer; and
 - 7.5. if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.

8. **DIRECT MARKETING**

- 8.1. At the outset it should be noted that POPIA draws a distinction between direct marketing by means of unsolicited electronic communications and direct marketing in person or by mail or telephone. Several provisions in POPIA draw a distinction between these two types of marketing.
- 8.2. "Direct marketing", as defined in POPIA, means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of:
 - 8.2. promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
 - 8.2. requesting the data subject to make a donation of any kind for any reason.
- 8.3. "Electronic communication", in turn, is defined as "[a]ny text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient" (our emphasis).
- 8.4. When DAVID HELLIG AND ABRAHAMSE does direct marketing, they must provide data subjects with an opt out. In addition, electronic direct marketing is stringently regulated under POPIA. If DAVID HELLIG AND ABRAHAMSE processes personal information of a data subject for the purpose of direct marketing by means of any form of electronic communication, including automatic calling machines (i.e. machines that are able to do automated calls without

human intervention),¹² facsimile machines, SMSs or e-mail is prohibited unless the data subject:

8.4. has given his, her or its consent in the prescribed manner and form set out in regulations 6 of the POPIA Regulations to the processing; or

8.4. is a customer of DAVID HELLIG AND ABRAHAMSE, as defined in section 69 of POPIA.

9. **MONITORING AND REVIEW OF THE POLICY**

This policy is reviewed yearly by the IO to ensure it is achieving its stated objectives.

¹² See section 69(5) of POPIA.

2. **WEBSITE PRIVACY POLICY**

This website privacy policy describes how we process information we collect and/or receive from you.

1. **INFORMATION WE COLLECT AND RECEIVE**

We collect and receive information about you in the following ways:

1.1. **Information you give us**

This includes any information that you provide to us directly:

- 1.1. when you sign-up to utilise our services;
- 1.1. by filling in forms on our websites, or those provided to you;
- 1.1. when you enter a competition, promotion or complete a survey;
- 1.1. by posting comments or content on our social media pages; or
- 1.1. when you contact us or we contact you and you provide information directly to us.

1.2. **What personal information we collect**

When you register to use our services, you will be required to provide us with the following information, your:

- 1.2. name and surname;
- 1.2. contact number and email address;
- 1.2. physical address;
- 1.2. identity or passport number; and
- 1.2. date of birth.

1.3. **Information we collect or receive when you use our website or social media platforms**

We collect information when you use websites or social media platforms by using cookies, web beacons and other technologies. Depending on how you access and use websites, we may receive:

- 1.3. log information;

- 1.3. information we infer about you based on your interaction with products and services;
- 1.3. device information (for example the type of device you're using, how you access platforms, your browser or operating system and your Internet Protocol ("IP") address);
- 1.3. location information.

1.4. **Information from third-party sources**

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

2. **HOW WE USE THE INFORMATION WE COLLECT AND RECEIVE**

We use the information we collect and receive for the following general purposes:

- 2.1. to provide you with information, products or services you request from us;
- 2.2. in order to refer you to an appropriate third-party service provider;
- 2.3. to communicate with you;
- 2.4. to provide you with support; and
- 2.5. to provide effective advertising (for example to be provide you with news, special offers and general information about other goods, services and events which we offer, that are similar to those that you have already hired or enquired about).

3. **HOW WE SHARE THE INFORMATION WE COLLECT AND RECEIVE**

- 3.1. We don't sell your personal information to third parties for their marketing purposes.
- 3.2. We may share information with:
 - 3.2. our affiliates, in other words, other companies in our group;
 - 3.2. we may disclose your personal information to a limited number of our employees and third party service providers (other than those who we refer you to), who we assist you to interact with;
 - 3.2. our business partners. We may share non-personally identifiable information with select business partners;

- 3.2. other parties in response to legal process or when necessary to conduct or protect our legal rights;
- 3.2. companies that provide services to us. Companies that provide services to us or act on our behalf may have access to information about you. These companies are limited in their ability to use information they receive in the course of providing services to us or you; and
- 3.2. third-parties where you provide consent. In some cases, third-parties (often advertisers) may wish to attain information about you in order to promote their products to you, or for whatever other reason. We may share information with third-parties where you provide consent in the form of an explicit opt-in. Before we ask you to opt-in, we will endeavour to provide you with a clear description of what data would be shared with the third-party. Remember that once you have opted in to allow us to send your information to the third-party, we cannot control what they do with your data; therefore, be sure to investigate their privacy policies before providing permission for us to share your information.

4. **YOUR RIGHTS**

- 4.1. You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that we will always provide to you when we communicate with you. We won't send you marketing messages if you tell us not to but we will still need to send you service-related messages.
- 4.2. Our websites use cookies. If you wish to reject our cookies, you can configure your browser to do so.
- 4.3. We want to make sure that any data we hold about you is up to date. So, if you think your personal information is inaccurate, you can ask us to correct or remove it.

5. **RETENTION OF DATA**

We will retain your personal information only for as long as is necessary for the purposes set out in this privacy policy or to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

6. **OUR COMMITMENT TO SECURITY**

The security of your data is important to us. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. However, we do employ a number of safeguards intended to mitigate the risk of unauthorized access or disclosure of your information. We will do our best to protect your personal information and we will use up to date

technology that will help us to do this. We will at all times comply with our obligation under applicable law.

7. TRANSFER OF DATA

- 7.1. We are based in and operate from South Africa. Your information, including personal information, may be transferred to and maintained on servers located outside of your country of residence, where the data privacy laws, regulations and standards, may not be equivalent to the laws in your country of residence.
- 7.2. We might transfer your personal information to places outside of South Africa and store it there, where our suppliers might process it. If that happens, your personal information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.
- 7.3. Your use of our website, followed by your submission of information to us, represents your consent to such transfer.
- 7.4. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

8. LINKS TO OTHER WEBSITES

Our website or social media platforms may contain links to and from websites, mobile applications or services of third parties, advertisers or affiliates. Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy statements of each website you visit which collects personal information.

9. CHANGES TO THIS PRIVACY POLICY

We may update this privacy policy from time to time. Any changes that we may make to our privacy policy will be posted on our website and will be effective from the date of posting.

10. ACCESS TO YOUR PERSONAL INFORMATION

- 10.1. You may at any time request:
- 10.1. confirmation that we hold your personal information;
 - 10.1. access to your personal information;

- 10.1. the identities or categories of third parties to whom we have disclosed your personal information; or
 - 10.1. that we correct or delete any personal information that is incomplete, misleading, inaccurate, excessive or out of date.
- 10.2. Requests may be made in writing bryan@dhaa.co.za and spencer@dhaa.co.za.

3. EXTERNAL PRIVACY STATEMENT

1. INTRODUCTION

1.1. For purposes of this Statement:

- 1.1. **"Applicable Laws"** means all laws, regulations that DAVID HELLIG AND ABRAHAMSE is required to comply with;
- 1.1. **"Client", "Customer" or "you"** means any prospective, new or existing client of DAVID HELLIG AND ABRAHAMSE;
- 1.1. **"Data subjects"** for the purpose of this policy include all living individuals and juristic persons about whom DAVID HELLIG AND ABRAHAMSE holds personal information. All data subjects have legal rights in relation to their personal information;
- 1.1. **"Operators"** include any person who processes personal information on behalf of a responsible party. Employees of responsible parties are excluded from this definition but it could include suppliers which handle personal information on DAVID HELLIG AND ABRAHAMSE's behalf;
- 1.1. **"Personal information"** means information relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- 1.1. **"Processing"** is any activity that involves use of personal information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—
 - 1.1.101.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.1.101.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 1.1.101.3. merging, linking, as well as restriction, degradation, erasure or destruction of information;

- 1.1. **"Services"** means any supply of products or rendering of services by the Operator for the Responsible Party in terms of the contract and in terms of which the Operator *inter alia* Processes Personal Information of Data Subjects; and
- 1.1. " DAVID HELLIG AND ABRAHAMSE" or "**we**" or "**us**" means DAVID HELLIG AND ABRAHAMSE.
- 1.2. This Statement sets out how your personal information will be used by DAVID HELLIG AND ABRAHAMSE and applies to any information, including personal and special personal information, you give to DAVID HELLIG AND ABRAHAMSE or which DAVID HELLIG AND ABRAHAMSE may collect from third parties.
- 1.3. It is important that you read this Statement carefully before submitting any personal information to DAVID HELLIG AND ABRAHAMSE.
- 1.4. By submitting any personal information to DAVID HELLIG AND ABRAHAMSE you provide consent to the processing of your personal information as set out in this Statement.
- 1.5. The provisions of this Statement are subject to mandatory, unalterable provisions of Applicable Laws;
- 1.6. Please do not submit any personal information to DAVID HELLIG AND ABRAHAMSE if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, DAVID HELLIG AND ABRAHAMSE may not be able to provide its products and services to you.

2. **HOW TO CONTACT US**

If you have any comments or questions about this Statement please contact the Information Officer, Bryan Hansen.

3. **AMENDMENT OF THIS STATEMENT**

- 3.1. We may amend this Statement from time to time for any of the following reasons:
 - 3.1. to provide for the introduction of new systems, methods of operation, services, products or facilities;
 - 3.1. to comply with changes to any legal or regulatory requirement;
 - 3.1. to ensure that our Statement is clearer and more favourable to you;
 - 3.1. to rectify any mistake that may be discovered from time to time; and/or

3.1. for any other reason which DAVID HELLIG AND ABRAHAMSE, in its sole discretion, may deem reasonable or necessary.

3.2. Any such amendment will come into effect and become part of any agreement you have with DAVID HELLIG AND ABRAHAMSE when notice is given to you of the change by publication on our website. It is your responsibility to check the website often.

4. **PRIVACY AND INDEMNITY**

4.1. DAVID HELLIG AND ABRAHAMSE takes your privacy and the protection of your personal information very seriously, and we will only use your personal information in accordance with this Statement and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your personal information yourself (for example, by ensuring that all passwords and access codes are kept secure).

4.2. We have implemented reasonable technical and operational measures to keep your personal information secure.

4.3. **You hereby indemnify and hold DAVID HELLIG AND ABRAHAMSE harmless from any loss, damages or injury that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information to DAVID HELLIG AND ABRAHAMSE.**

5. **PROCESSING OF PERSONAL INFORMATION BY OPERATORS**

5.1. The Responsible Party shall comply and ensure that it lawfully Processes Personal Information in accordance with its obligations as set out in POPIA. The Responsible Party warrants that all the Personal Information provided to the Operator complies with the conditions for lawful Processing of Personal Information as set out in POPIA. Without limiting the Responsible Party's obligations under this letter of agreement, the Responsible Party shall comply with applicable industry or professional rules and regulations, in relation to the safeguarding of Personal Information, which may apply to it.

5.2. The Operator shall Process Personal Information of Data Subjects with the knowledge and authorisation of the Responsible Party. Unless required by law, the Operator shall Process the Personal Information only (i) in compliance with this policy; and (ii) for the purposes connected with the provision of the Services or as specifically otherwise instructed or authorised by the Responsible Party in writing.

5.3. The Operator shall treat the Personal Information that comes to its knowledge or into its possession as confidential and shall not disclose it without the prior written consent of the Responsible Party, unless required to do so by law

- 5.4. The Operator shall use reasonable efforts secure the integrity and confidentiality of the Personal Information in by taking appropriate, reasonable technical and organisational measures to prevent (i) loss of, damage to or unauthorised destruction of the Personal Information; and (ii) unlawful access to or Processing of the Personal Information.
- 5.5. The Operator shall notify the Responsible Party as soon as reasonably possible, if any Personal Information under the control of the Operator has been or may reasonably believe to have been accessed or acquired by an unauthorised person.
- 5.6. The Responsible Party indemnifies and holds the Operator harmless from any and all losses arising from any claim or action arising from the Processing of the Personal Information in terms of this contract or this policy by any party, including by any Data Subject or any regulator in South Africa or anywhere.

6. **INFORMATION WHICH WE MAY COLLECT ABOUT YOU**

- 6.1. We may collect the following information about you:
 - 6.1. this information may include your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
 - 6.1. records of correspondence or enquiries from you or anyone acting on your behalf;
 - 6.1. details of transactions you carry out with us;
 - 6.1. details of contracts, sales or leases you carry out with us;
 - 6.1. sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints.
- 6.2. Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Statement.

7. **HOW WE COLLECT INFORMATION**

- 7.1. You may provide personal information to us either directly or indirectly (through an agent acting on your behalf, or an introducer), by completing an application for our products and services or requesting further information about our products and services, whether in writing, through our website, over the telephone or any other means.
- 7.2. We may also collect your personal information from your appointed agent, any regulator, or other third party that may hold such information.

8. USE OF INFORMATION COLLECTED

- 8.1. We may use, transfer and disclose your personal information for the purposes of:
- 8.1. providing you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;
 - 8.1. managing your account or relationship and complying with your instructions or requests;
 - 8.1. detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
 - 8.1. assessing and dealing with complaints and requests;
 - 8.1. operational, marketing, auditing, legal and record keeping requirements;
 - 8.1. verifying your identity or the identify of your beneficial owner;
 - 8.1. transferring or processing your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites;
 - 8.1. complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
 - 8.1. recording and/or monitoring your telephone calls and electronic communications to/with DAVID HELLIG AND ABRAHAMSE in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
 - 8.1. conducting market research and providing you with information about our products or services from time to time via email, telephone or other means (for example, events);
 - 8.1. where you have unsubscribed from certain direct marketing communications, ensuring that we do not sent such direct marketing to you again;
 - 8.1. disclosing your personal information to third parties for reasons set out in this Statement or where it is not unlawful to do so;

- 8.1. monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from DAVID HELLIG AND ABRAHAMSE or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and DAVID HELLIG AND ABRAHAMSE; and
- 8.1. improving or evaluating the effectiveness of our business or products, services or offerings.
- 8.2. We may from time to time contact you about services, products and offerings available from DAVID HELLIG AND ABRAHAMSE or specific subsidiaries which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications by emailing the IO at bryan@dhaa.co.za

9. **DISCLOSURE OF YOUR INFORMATION**

- 9.1. Your personal information may be shared with our subsidiaries, our agents and sub-contractors, and selected third parties who process the information on our behalf.
- 9.2. We may also disclose your personal information to third parties in the following circumstances:
 - 9.2. to assess and monitor any of your applications for our products or services;
 - 9.2. to have a better understanding of the your circumstances and needs to provide and improve our products and services;
 - 9.2. to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;
 - 9.2. to any regulator or supervisory authority, including those in foreign jurisdictions, if DAVID HELLIG AND ABRAHAMSE is required to do so in terms of Applicable Laws;
 - 9.2. to a prospective buyer or seller of any of our businesses or assets;
 - 9.2. to any person if we are under a duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of DAVID HELLIG AND ABRAHAMSE, Clients or other third parties; and/or
 - 9.2. to your agent or any other person acting on your behalf, an or an introducer.

- 9.3. We may transfer your information to another of the DAVID HELLIG AND ABRAHAMSE entities, an agent, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.
- 9.4. If you do not wish us to disclose this information to third parties, please contact us at the contact details set out above. We may, however, not be able to provide products or services to you if such disclosure is necessary.

10. **RETENTION OF YOUR INFORMATION**

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your information in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

11. **ACCESS TO, CORRECTION AND DELETION OF YOUR PERSONAL INFORMATION**

- 11.1. You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2000 (“**PAIA**”). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by DAVID HELLIG AND ABRAHAMSE, please review our PAIA Manual located at www.dhale.co.za
- 11.2. You may request the correction of personal information DAVID HELLIG AND ABRAHAMSE holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, DAVID HELLIG AND ABRAHAMSE may limit the products and services offered to you or elect not to open the account.
- 11.3. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.
- 11.4. You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

12. **COMPLAINTS**

- 12.1. Should you believe that DAVID HELLIG AND ABRAHAMSE has utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with us.
- 12.2. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:
- 12.2. Tel: 012 406 4818
- 12.2. Fax: 086 500 3351
- 12.2. Email: complaints.IR@justice.gov.za

4. STANDARD OPERATOR CLAUSES

1. Definitions

- 1.1. **"Data Subject"** shall have the meaning ascribed to it in Chapter 1 of POPIA;
- 1.2. **"Operator"** means DAVID HELLIG AND ABRAHAMSE;
- 1.3. **"Parties"** means the parties to this Agreement being, together, the Responsible Party and the Operator and **"Party"** means any one of them;
- 1.4. **"Personal Information"** shall have the meaning ascribed to it in Chapter 1 of POPIA;
- 1.5. **"POPIA"** shall mean the Protection of Personal Information Act, No 4 of 2013, as amended from time to time, including any regulations and/or code of conduct made thereunder;
- 1.6. **"Processing"** shall have the meaning ascribed to it in Chapter 1 of POPIA;
- 1.7. **"Record"** shall have the meaning ascribed to it in Chapter 1 of POPIA; and
- 1.8. **"Responsible Party"** means DAVID HELLIG AND ABRAHAMSE.

2. Operator Warranty

- 2.1. The Operator warrants if, and to the extent that it may, process any Personal Information for and on behalf of the Responsible Party it shall:
 - 2.1. process such Personal Information only with the knowledge and authorisation of Responsible Party;
 - 2.1. treat Personal Information which comes to its knowledge as confidential, and not disclose Personal Information to any third parties without the written consent of Responsible Party unless required by law or in the course of the proper performance of the Operator's duties;
 - 2.1. have due regard to generally accepted information security practices and procedures which may apply to the Operator generally or be required in terms of specific industry or professional rules and regulations;
 - 2.1. notify Responsible Party immediately where there are reasonable grounds to believe that Personal Information has been accessed or acquired by any unauthorised person;
 - 2.1. establish and maintain security measures to secure the integrity and confidentiality of Personal Information in its possession or under its control by

taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to, or unauthorised destruction of Personal Information and unlawful access to, or processing of, Personal Information and shall take reasonable measures to:

- 2.1.142.1. identify all reasonably foreseeable internal and external risks to Personal Information in its possession or under its control;
- 2.1.142.2. establish and maintain appropriate safeguards Responsible Party against the risks identified;
- 2.1.142.3. regularly verify that the safeguards are effectively implemented; and
- 2.1.142.4. ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

3. **Indemnity**

The Operator hereby indemnifies and holds Responsible Party harmless from any liability whatsoever arising from the Operator's failure to comply with the warranties contained in this Agreement.

5. MODEL POPIA CONSENT CLAUSES

PROCESSING OF PERSONAL INFORMATION

1. The Client's privacy is very important to DAVID HELLIG AND ABRAHAMSE and it will use reasonable efforts in order to ensure that any information, including personal information, provided by the Client, or which is collected from the Client, is stored in a secure manner.
2. The Client agrees to give (where applicable) honest, accurate and current information about the Client to DAVID HELLIG AND ABRAHAMSE and to maintain and update such information when necessary.
3. The Client's personal information collected by DAVID HELLIG AND ABRAHAMSE may be used for the following reasons:
 - 3.1. cross-border transfers to other countries and international organisations, and the level of protection afforded to the information by that country or international organisation;
 - 3.2. the processing of personal information on [the company's website];
 - 3.3. further processing by third parties, including the fact that members of the Group may access information on [the company's website];
 - 3.4. direct marketing;
 - 3.5. fraud prevention;
 - 3.6. SARB and SARS reporting and the like if applicable; and
 - 3.7. the recipient or category of recipients of the information.
4. The Client acknowledges that any information supplied to DAVID HELLIG AND ABRAHAMSE is voluntarily.
5. By submitting any information to DAVID HELLIG AND ABRAHAMSE in any form the Client further acknowledges that such conduct constitutes an unconditional, specific and voluntary consent to the processing of such information by DAVID HELLIG AND ABRAHAMSE under any applicable law in the manner contemplated above, which consent shall, in the absence of any written objection received from the Client, be indefinite and/or for the period otherwise required in terms of any applicable law.
6. **Unless the Client has consented, DAVID HELLIG AND ABRAHAMSE will not sell, exchange, transfer, rent or otherwise make available any personal information about the Client (such as name, address, email address, telephone or fax number) to other parties and the Client indemnifies DAVID HELLIG AND ABRAHAMSE from any unintentional disclosures of such information to unauthorized persons.**

7. Should the Client believe that DAVID HELLIG AND ABRAHAMSE has utilised the Client's personal information contrary to applicable law, the client shall first resolve any concerns with DAVID HELLIG AND ABRAHAMSE. If the Client is not satisfied with such process, the Client has the right to lodge a complaint with the Information Regulator of South Africa.

8. **CONSENTS**

- 8.1. Client warrants that it will have obtained the necessary consents required in terms of POPIA or other laws which may be applicable from time to time, from the relevant data subjects, to the extent it provides personal information to DAVID HELLIG AND ABRAHAMSE.
- 8.2. Client acknowledges and consents to its Personal Information being shared with third party service providers, consultants and agents.
- 8.3. DAVID HELLIG AND ABRAHAMSE will store and retain Client's personal information for as long as is necessary for the purposes specified in this Agreement or for as long as permitted or otherwise required by law.

PROTECTION OF PERSONAL INFORMATION ACT COMPLIANCE SURVEY

1. PLEASE READ THE FOLLOWING GUIDANCE NOTES BEFORE COMPLETING THIS FORM:

- 1.1. The Protection of Personal Information Act 4 of 2013 (“**POPIA**”) was signed into law by the President on 19 November 2013. As an employee of DAVID HELLIG AND ABRAHAMSE you are well aware that we have always been committed to quality and compliance with industry standards and applicable laws. POPIA exposes DAVID HELLIG AND ABRAHAMSE and, indeed, all parties who process personal information of data subjects to potential liability.
- 1.2. The purpose of this questionnaire is to find out what personal information DAVID HELLIG AND ABRAHAMSE / your department collects and how that information is used to enable DAVID HELLIG AND ABRAHAMSE to set standards for compliance with POPIA.
- 1.3. Please complete this form in full and do not leave any blanks.

BUSINESS DIVISION/DEPARTMENT											
NAME AND DESIGNATION OF PERSON COMPLETING QUESTIONNAIRE											
COMPLETION DATE	D	D	M	M	Y	Y	Y	Y	Y	Y	
PART I – GENERAL COLLECTION AND PROCESSING PROVISIONS								Y	N	N/A	
1. Does your department collect, receive, record, organise, collate, store, update, modify, retrieve, alter, consult, use, transmit, distribute, make available in any other form, merge, link, restrict, degrade, erase, or destroy, any information relating to the following categories?											
	Y	N	N/A		Y	N	N/A		Y	N	N/A
RACE				SEXUAL ORIENTATION				BELIEF			
GENDER				AGE				CULTURE			
OTHER				TELEPHONE NUMBER				BIRTH			
PREGNANCY				WELLBEING				EDUCATION			

MARITAL STATUS				DISABILITY				COLOUR			
NATIONALITY				RELIGION				UNIQUE IDENTIFIER			
ETHNICITY				CONSCIENCE				E-MAIL ADDRESS			
ETHNIC OR SOCIAL ORIGIN				PHYSICAL OR MENTAL HEALTH				PHYSICAL ADDRESS			
MEDICAL, FINANCIAL, CRIMINAL OR EMPLOYMENT HISTORY				LOCATION INFORMATION				BIOMETRIC INFORMATION			
PERSONAL OPINIONS, VIEWS OR PREFERENCES				THE VIEWS OR OPINIONS OF ANOTHER INDIVIDUAL ABOUT THE DATA SUBJECT (THE PERSON TO WHOM INFORMATION RELATES)				CORRESPONDENCE SENT BY A PERSON THAT IS IMPLICITLY OR EXPLICITLY OF A PRIVATE / CONFIDENTIAL NATURE			
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											
FINANCIAL OR CREDIT HISTORY											
1.4. Please specify whether such information is stored as manual or computer files and whether it is readily accessible by your department.											
1.5. Please specify the reason(s) or purpose(s) for collecting such information (i.e. why is it necessary to collect and process such information / what objective does collection and processing achieve?)											

1.6.	Please specify whether the person to whom the information relates is made aware of the reason for collecting such information.			
1.7.	Please specify whether the information is used for any further purposes.			
1.8.	Please specify whether any information is sent outside the borders of South Africa.			
1.9.	Please specify the period that each item is retained for.			
1.10.	If any of such information is destroyed, please advise as to: <ul style="list-style-type: none"> • The period of retention before destruction; • The reason for destruction; • The manner of destruction; • If the information is destroyed by a third party, please specify the manner of destruction and the third party details and whether a contractual agreement exists between your unit/the business and the third party. 			
1.11.	Do you have a process in place to ensure the completeness and accuracy of such information both during collection and at all stages thereafter?			
1.9.	If the answer to 1.11 is “yes” , please describe this process.			
1.10.	Is any information processed by a third party on your behalf? (Please note that this applies to all information referred to in 1.4 and includes information marked “no” or “not applicable”.)			
1.11.	If the answer to 1.13 is “yes” , please specify the items, the processing third party and whether there is an existing contract in place with the third party.			
1.12.	Do you process any information on behalf of a third party? (Do you assist any person, juristic or natural, in entering into a contract with a third party or collect any information on the third party’s behalf?)			
1.13.	If the answer to 1.12 is “yes” , please specify the items, the third party(s) on whose behalf the information is processed and whether there is an existing contract in place with the third party.			
PART II – RIGHTS OF DATA SUBJECTS AND PROCESSING CONDITIONS				
2.	Is voluntary, specific and informed consent requested and obtained from the person to whom the information relates before such information is collected or used?	YES	NO	N/A

2.1. If the answer to 2 is “yes” , please specify how such consent is obtained and attach documentary proof where possible.			
2.2. Is all such information collected directly from the data subject?	YES	NO	N/A
2.3. If the answer to 2.2 is “yes” , is any of the information verified by an independent source, such as TransUnion ITC?			
2.4. If the answer to 2.2 is “no” , please specify the nature of the information and its source.			
2.5. Is the privacy and security of the information collected sufficiently protected both during collection and at all stages thereafter, i.e. are there security safeguards in place to protect the information?	YES	NO	N/A
<p>2.6. If the answer to 2.5 is “yes”, please specify how such information is protected, your response should indicate what safeguards are in place, how risks are identified and managed, what controls are in place and how often the efficacy of these controls is reviewed. Your response should also make specific reference to:</p> <ul style="list-style-type: none"> • Maintaining the integrity and confidentiality of personal information; • The technical and organisational measures employed; • Prevention of unauthorised destruction ; • Prevention of unauthorised duplication; • Prevention of unlawful access ; and • Other relevant risks and how these are mitigated. 			
2.7. If the answer to 2.5 is “no” , please specify how the privacy or security of such information may actually or potentially be compromised.			
2.8. Is direct marketing sent to persons by means of emails, faxes or SMSes and the like?			
2.9. Are data subjects afforded an opportunity to object to their personal information being used for purposes of direct marketing/unsolicited electronic communications?			
2.10. If the answer to 2.9 is “yes” , please specify how such objection is noted and enforced.			

2.11. Are data subjects afforded an opportunity to object to the use of their personal information on reasonable grounds relating to their particular situation?			
2.12. If the answer to 2.11 is “ yes ”, please advise how such objection is noted and enforced.			
2.13. Do you conduct security checks (identity verification) before divulging personal information relating to any person to any other third party?			
<p>2.14. If the answer to 2.13 is “yes”, please provide full details of the following:</p> <p>2.15. How security checks are conducted; and</p> <p>2.16. The rules governing security checks, including, the number of questions asked, the types of questions asked and the degree of variance allowed/disallowed.</p>			
2.17. Do you receive requests for copies of information or the deletion of information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully?			
2.18. If the answer to 2.17 is “ yes ”, do you action these requests?			
2.19. If the answer to 2.17 is “ yes ”, please provide full details of how these requests are actioned and how the information is provided or deleted or amended in your department and throughout all the departments.			
2.20. How do you think a data breach is likely to occur at our organisation?			

THE PROMOTION OF ACCESS TO INFORMATION MANUAL

DAVID HELLIG AND ABRAHAMSE

THE PROMOTION OF ACCESS TO INFORMATION MANUAL

("Manual")

1. PREAMBLE

- 1.1. The Promotion of Access to Information Act, 2000 (“**PAIA**”) came into operation on 9 March 2001. PAIA seeks, among other things, 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 and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.
- 1.2. Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual has to comply with.
- 1.3. This Manual constitutes the DAVID HELLIG AND ABRAHAMSE PAIA manual. This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 (“**POPIA**”), which gives effect to everyone’s Constitutional right to privacy. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.
- 1.4. This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

VERSION	POLICY OWNER	DATE
1.0	DAVID HELLIG AND ABRAHAMSE	30/06/2021

2. ABOUT DAVID HELLIG AND ABRAHAMSE

David Hellig & Abrahamse was established in January 1980 with offices in Paarl and Cape Town. We are a truly multi-disciplined survey firm offering a vast range of services supported by leading edge technology. Drawing upon our resources and over 30 years of experience we are able to ensure that projects are delivered to clients within the time frame.

3. CONTACT DETAILS

Name of Private Body: DAVID HELLIG AND ABRAHAMSE

Designated Information Officer: Bryan Hansen

Email address of Information Officer: Bryan@dhaa.co.za

Postal address: PO BOX 9010, Cape Town, 8000

Street address: 38 Wale Street, Cape Town

Phone number: 021 426 2613

4. INFORMATION REGULATORS GUIDE

An official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from Information Regulator in the manner prescribed. Any enquiries regarding the Guide should be directed to:

Postal Address: JD House
27 Stiemens Street
Braamfontein, Johannesburg, 2001

E-mail Address: infoereg@justice.gov.za

Website: <https://www.justice.gov.za/infoereg/>

5. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

5.1. to provide a list of all records held by the legal entity;

- 5.2. to set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;
- 5.3. to define the manner and form in which a request for information must be submitted; and
- 5.4. to comply with the additional requirements imposed by POPIA.

6. **ENTRY POINT FOR REQUESTS**

- 6.1. PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.
- 6.2. Information will therefore not be furnished unless a person provides sufficient particulars to enable DAVID HELLIG AND ABRAHAMSE to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.
- 6.3. The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 6.4. The Information Officer will facilitate the liaison with the internal legal team on all of these requests.
- 6.5. All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 3 above.

7. **AUTOMATICALLY AVAILABLE INFORMATION**

- 7.1. Information that is obtainable via the website about DAVID HELLIG AND ABRAHAMSE is automatically available and need not be formally requested in terms of this Manual.
- 7.2. The following categories of records are automatically available for inspection, purchase or photocopying:
 - 7.1.1 brochures;
 - 7.1.2 press releases;
 - 7.1.3 publication; and

7.1.4 various other marketing and promotional material.

8 INFORMATION AVAILABLE IN TERMS OF POPIA

8.1 In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which data is processed by DAVID HELLIG AND ABRAHAMSE will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected. Please also refer to the DAVID HELLIG AND ABRAHAMSE's Privacy Policy www.dhale.co.za for further information.

8.2 Categories of personal information collected by DAVID HELLIG AND ABRAHAMSE

DAVID HELLIG AND ABRAHAMSE may collect information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- 8.2.1 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;
- 8.2.2 information relating to the education or the medical, financial, criminal or employment history of the person;
- 8.2.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- 8.2.4 the biometric information of the person;
- 8.2.5 the personal opinions, views or preferences of the person;
- 8.2.6 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;
- 8.2.7 the views or opinions of another individual about the person; and
- 8.2.8 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.

8.3 The purpose of processing personal information

8.3.1 In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which personal information is processed by DAVID HELLIG AND

ABRAHAMSE will depend on the nature of the personal information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.

8.3.2 In general, personal information is processed for purposes to provide you with information, products or services you request from us, in order to refer you to an appropriate third-party service provider, to communicate with you, to provide you with support, dealing providing services and/or products, procurement purposes, records management, security, employment and related matters.

8.4 A description of the categories of data subjects and of the information or categories of information relating thereto

DAVID HELLIG AND ABRAHAMSE holds information and records on the following categories of data subjects:

8.4.1 employees / personnel of DAVID HELLIG AND ABRAHAMSE;

8.4.2 any third party with whom DAVID HELLIG AND ABRAHAMSE conducts business;

8.4.3 contractors of DAVID HELLIG AND ABRAHAMSE;

8.4.4 suppliers of DAVID HELLIG AND ABRAHAMSE.

(This list of categories of data subjects is non-exhaustive.)

8.5 The recipients or categories of recipients to whom the personal information may be supplied

Depending on the nature of the personal information, DAVID HELLIG AND ABRAHAMSE may supply information or records to the following categories of recipients:

5.1.1. statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;

8.5.1 any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;

8.5.2 South African Revenue Services, or another similar authority;

8.5.3 anyone making a successful application for access in terms of PAIA or POPIA;

8.5.4 third party service providers (other than those who we refer you to), who we assist you to interact with and our business partners;

8.5.5 subject to the provisions of POPIA and other relevant legislation, DAVID HELLIG AND ABRAHAMSE may share information about a client's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which DAVID HELLIG AND ABRAHAMSE operates.

8.6 Planned transborder flows of personal information

8.6.1 If a data subject visits DAVID HELLIG AND ABRAHAMSE's website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.

8.6.2 DAVID HELLIG AND ABRAHAMSE may need to transfer a data subject's information to service providers in countries outside South Africa, in which case it will fully comply with applicable data protection legislation.

8.6.3 These countries may not have data-protection laws which are similar to those of South Africa.

8.7 A general description of information security measures to be implemented by DAVID HELLIG AND ABRAHAMSE

DAVID HELLIG AND ABRAHAMSE takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in our possession. DAVID HELLIG AND ABRAHAMSE takes appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

9 INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation:

- *Administration of Estates Act 66 of 1965*
- *Basic Conditions of Employment Act 75 of 1997*
- *Close Corporations Act 69 of 1984*
- *Companies Act 71 of 2008*
- *Compensation for Occupational Injuries and Health Diseases Act 130 of 1993*
- *Employment Equity Act 55 of 1998*
- *Estate Agency Affairs Act 112 of 1976*
- *Income Tax Act 58 of 1962*

- *Insolvency Act No. 24 of 1936*
- *Labour Relations Act 66 of 1995*
- *Occupational Health & Safety Act 85 of 1993*
- *Pension Funds Act 24 of 1956*
- *Skills Development Act 97 of 1998*
- *Skills Development Levies Act 9 of 1999*
- *Stock Exchanges Control Amendment Act 54 of 1995* (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)
- *Unemployment Contributions Act 4 of 2002*
- *Unemployment Insurance Act 63 of 2001*
- *Value Added Tax Act 89 of 1991*

10 CATEGORIES OF RECORDS AVAILABLE UPON REQUEST

10.1 DAVID HELLIG AND ABRAHAMSE maintains records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case by case basis in accordance with the provisions of PAIA.

10.2 Please note further that many of the records held by DAVID HELLIG AND ABRAHAMSE are those of third parties, such as clients and employees, and DAVID HELLIG AND ABRAHAMSE takes the protection of third party confidential information very seriously. In particular, where DAVID HELLIG AND ABRAHAMSE acts as professional advisors to clients, many of the records held are confidential and others are the property of the client and not of DAVID HELLIG AND ABRAHAMSE. For further information on the grounds of refusal of access to a record please see paragraph 11.5 below. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

Category of records	Records
<p>Internal records</p> <p>The records listed pertain to DAVID HELLIG AND ABRAHAMSE's own affairs</p>	<ul style="list-style-type: none"> • Memoranda and Articles of Association • Financial records • Operational records • Intellectual property • Marketing records • Internal correspondence • Service records • Statutory records

Category of records	Records
	<ul style="list-style-type: none"> • Internal policies and procedures • Minutes of meetings
<p>Personnel records</p> <p>For the purposes of this section, “personnel” means any person who works for or provides services to or on behalf of DAVID HELLIG AND ABRAHAMSE and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of DAVID HELLIG AND ABRAHAMSE. This includes partners, directors, all permanent, temporary and part-time staff as well as consultants and contract workers.</p>	<ul style="list-style-type: none"> • Any personal records provided to us by our personnel • Any records a third party has provided to us about any of their personnel • Conditions of employment and other personnel-related contractual and quasi legal records • Employment policies and procedures • Internal evaluation and disciplinary records and • Other internal records and correspondence.
<p>Client-related records</p>	<ul style="list-style-type: none"> • Contracts with the client and between the client and other persons
<p>Other third party records</p> <p>Records are kept in respect of other parties, including without limitation joint ventures and consortia to which DAVID HELLIG AND ABRAHAMSE is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to DAVID HELLIG AND ABRAHAMSE.</p>	<ul style="list-style-type: none"> • Personnel, client, or DAVID HELLIG AND ABRAHAMSE records which are held by another party as opposed to being held by DAVID HELLIG AND ABRAHAMSE • Records held by DAVID HELLIG AND ABRAHAMSE pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers
<p>Other records</p>	<ul style="list-style-type: none"> • Information relating to DAVID HELLIG AND ABRAHAMSE • Research information belonging to DAVID HELLIG AND ABRAHAMSE or carried out on behalf of a third party

11 REQUEST PROCEDURE

11.1 Completion of the prescribed form

- 11.1.1 Any request for access to a record in terms of PAIA must substantially correspond with Form C of Annexure B to Government Notice No. R.187 dated 15 February 2002 and should be specific in terms of the record requested. Please refer to Appendix A.
- 11.1.2 A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.
- 11.1.3 POPIA provides that a data subject may, upon proof of identity, request DAVID HELLIG AND ABRAHAMSE to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.
- 11.1.4 POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, DAVID HELLIG AND ABRAHAMSE must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.
- 11.1.5 Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
- 11.1.6 POPIA provides that a data subject may object, at any time, to the processing of personal information by DAVID HELLIG AND ABRAHAMSE, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as Appendix C and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.
- 11.1.7 A data subject may also request DAVID HELLIG AND ABRAHAMSE 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 DAVID HELLIG AND ABRAHAMSE is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- 11.1.8 A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request

to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above on the form attached hereto as Appendix D.

11.2 Proof of identity

Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

11.3 Payment of the prescribed fees

11.3.1 There are two categories of fees which are payable:

11.3.1.1 The request fee: R50

11.3.1.2 The access fee: This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in Appendix B.

11.3.2 Section 54 of PAIA entitles DAVID HELLIG AND ABRAHAMSE to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Regulation 9(2)(c) promulgated under PAIA.

11.3.3 Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

11.4 Timelines for consideration of a request for access

11.4.1 Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

11.4.2 Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

11.5 Grounds for refusal of access and protection of information

11.5.1 There are various grounds upon which a request for access to a record may be refused. These grounds include:

11.5.1.1 the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;

- 11.5.1.2 the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- 11.5.1.3 if disclosure would result in the breach of a duty of confidence owed to a third party;
- 11.5.1.4 if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- 11.5.1.5 if the record was produced during legal proceedings, unless that legal privilege has been waived;
- 11.5.1.6 if the record contains trade secrets, financial or sensitive information or any information that would put DAVID HELLIG AND ABRAHAMSE (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
- 11.5.1.7 if the record contains information about research being carried out or about to be carried out on behalf of a third party or by DAVID HELLIG AND ABRAHAMSE.

11.5.2 Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

11.5.3 If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty one) days of receipt of the request. The third party would then have a further 21 (twenty one) days to make representations and/or submissions regarding the granting of access to the record.

12 REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

12.1 If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.

12.2 There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. In the event that you are not satisfied with the outcome of the request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

12.3 Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

13 AVAILABILITY OF THIS MANUAL

Copies of this Manual are available for inspection, free of charge, at the offices of DAVID HELLIG AND ABRAHAMSE and at 38 Wale Street, Cape Town.

APPENDIX A - FORM C: REQUEST FORM

ACCESS REQUEST FORM**Particulars of DAVID HELLIG AND ABRAHAMSE's Information Officer**

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

Information Officer	Bryan Hansen
Street Address	38 Wale Street Cape Town
Postal Address	PO Box 9010 Cape Town 8000
Telephone	021 426 2613
Email	bryan@dhaa.co.za
Website	www.dhale.co.za

Particulars of person requesting access to the record

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

**Full names and
surname:**

Identity number:

Postal address:

Fax number:

Telephone number:

E-mail address:

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

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

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

Name of entity:

Registration number:

Postal address:

Fax number:

Telephone number:

E-mail address:

Particulars of person on whose behalf request is made

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

**Full names and
surname:**

Identity number:

Particulars of record

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

Description of record or relevant part of the record:

Reference number (if available):

Any further particulars of record:

FEES

- a) *A request for access to a record will be processed only after a request fee has been paid.*
- b) *You will be notified of the amount to be paid as the request fee.*
- c) *The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*
- d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption.*

Reason for exemption of payment of fees:

FORM OF ACCESS TO RECORD

Form in which record is required.

Mark the appropriate box with an X

NOTES

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

If the record is in written or printed form

Copy of record Inspection of record
If record consists of visual images

View the images Copy of the images Transcription of the images
If the record consists of recorded information that can be reproduced in sound

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

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

If you requested a copy or transcription of a record (above) do you wish

Yes

No

the copy of transcription to be posted to you? Note that postage is payable.

Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available.

In which language would you prefer the record?

In the event of a disability

If you are prevented by a disability from reading, viewing or listening to the record, state your disability and indicate in the form in which the record is required:

Disability

Form in which record is required

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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

1. Indicate the right to be exercised or protected:

2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

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

enable compliance with your request.

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

Signed at..... on this day of20....

SIGNATURE OF REQUESTER/PERSON ON
WHOSE BEHALF REQUEST IS MADE

PRINT NAME:

YOU MUST

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

SEND WITH THIS APPLICATION

- 1 The request fee
- 2 Any additional folios completed
- 3 Copy of Identity Document

APPENDIX B: FEES IN RESPECT OF PRIVATE BODIES

Description		Rand
1	The fee for a copy of the manual as contemplated in regulation 9(2)(c) - for every photocopy of an A4-size page or part thereof.	1,10
2	The fees for reproduction referred to in regulation 11(1) are as follows:	
(a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	0,75
(c)	For a copy in a computer-readable form on -	
(i)	stiffy disc	7,50
(ii)	compact disc	70,00
(d)(i)	For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii)	For a copy of visual images	60,00
(e)(i)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii)	For a copy of an audio record	30,00
3	The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2)	50,00
4	The access fees payable by a requester referred to in regulation 11(3) are as follows:	
4.1(a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	0,75
(c)	For a copy in a computer-readable form on -	
(i)	stiffy disc	7,50
(ii)	compact disc	70,00

(d)(i)	For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii)	For a copy of visual images	60,00
(e)(i)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii)	For a copy of an audio record	30,00
(f)	To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	
4.2	For purposes of section 54(2) of the Act, the following applies:	
(a)	Six hours as the hours to be exceeded before a deposit is payable; and	
(b)	one third of the access fee is payable as a deposit by the requester.	
4.3	The actual postage is payable when a copy of a record must be posted to a requester.	

APPENDIX C - OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF 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	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....

Signature of data subject/designated person

APPENDIX D: 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:	

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

Signed at this day of20.....

.....

Signature of data subject/ designated person