



Legal Dynamix<sup>TM</sup>

# Legal Dynamix (Pty) Ltd PAIA and POPIA Manual

PAIA - Promotion of Access to Information Act 2 of 2000

POPIA - Protection of Personal Information Act 4 of 2013

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

*Date compiled 1 October 2022 | Date revised 1 October 2022*

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[legaldynamix.co.za](http://legaldynamix.co.za)

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## 1. INTRODUCTION TO THE COMPANY

- 1.1. Legal Dynamix (Pty) Ltd is a company incorporated in the Republic of South Africa with company registration number 2022/260266/07. The Company provides bespoke legal advisory services aimed at the requirements of in-house legal departments of companies. The company is not a law firm.
- 1.2. This Manual has been compiled in accordance with the requirements of the Promotion of Access to Information Act, Act No 2 of 2000 (PAIA). The Company is a private body as defined in PAIA, and this manual contains the information specified in section 51(1) of PAIA, which is applicable to such a private body. This Manual also complies with the requirements of the Protection of Personal Information Act 4 of 2013 (POPIA).
- 1.3. The information required to be disclosed is as follows:
  - 1.3.1. The contact details of the head of the private body.
  - 1.3.2. A description of the guide referred to in section 10 of PAIA.
  - 1.3.3. The latest notice published by the Minister of Justice and Constitutional Development under section 52(2) of PAIA.
  - 1.3.4. A description of the records of the private body which are available in terms of any legislation other than PAIA.
  - 1.3.5. A description of the subjects on which the private body holds records and the categories of records held on each subject in enough detail to facilitate a request for access to a record, and other information as prescribed by regulation.
  - 1.3.6. A description of personal information processed as required by POPIA.
- 1.4. This Manual will be updated on a periodic basis in accordance with the requirements of section 51(2) of PAIA. A copy of the Manual will be made available to the South African Human Rights Commission (the SAHRC) in terms of PAIA or the Information Regulator in terms of POPIA on request, whichever may be applicable, and will be published on the Company's website [www.legaldynamix.co.za](http://www.legaldynamix.co.za).
- 1.5. The Company holds certain records (information and documents), including personal information as defined under POPIA. PAIA and POPIA provide for certain records and/or information, including personal information, to be accessed where certain circumstances are met and in accordance with certain procedures and at prescribed fees, giving effect to the right of access to information in terms of the Constitution of the Republic of South Africa. Although both Acts relate to information, their scope is different but complementary. POPIA mainly sets out the requirements in respect of protecting the information that relates to (but not limited to) an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. PAIA relates to information held by the State and any information held by another person including a private body/company and that is required for the exercise or protection of any rights – subject to justifiable limitations. The Company is not an organ of State and is a private company.
- 1.6. The Company is required to appoint an Information Officer in accordance with both PAIA and POPIA and has accordingly done so as set out below.

## 2. DEFINITIONS

For the purposes of this Manual the following definitions shall apply:

- 2.1. **Client** or **Customer** means a natural or juristic person who or which receives services from the Company in terms of an agreement or contract for the provision of products and/or services.
- 2.2. **Company** means Legal Dynamix (Pty) Ltd, a private body as defined under PAIA.
- 2.3. **Employee** means any person who works for or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration.
- 2.4. **Guide** means the guide published by the SAHRC in terms of section 10 of the Act.
- 2.5. **Manual** means this manual which is published in accordance with section 51 of PAIA.
- 2.6. **Minister** means the Cabinet member responsible for the administration of justice, presently the Minister of Justice and Constitutional Development.
- 2.7. **PAIA** means the Promotion of Access to Information Act 2 of 2000 (as amended from time to time) and including applicable regulations promulgated in terms of the Act.
- 2.8. **POPIA** means the Protection of Personal Information Act 4 of 2013.
- 2.9. **Requester** means any person or entity requesting access to a record that is under the control of the Company and who is entitled to request such access under PAIA or POPIA.
- 2.10. **SAHRC** means the South African Human Rights Commission established under the Human Rights Commission Act 54 of 1994 and is a Chapter 9 Institution under the Constitution of the Republic of South Africa.
- 2.11. **Information Regulator** means the regulatory body established under POPIA.
- 2.12. The term '**the body**' as may appear in this Manual means the Company.
- 2.13. The term '**responsible party**' means the entity responsible for processing personal information under POPIA and for purposes of this Manual means the Company.

## 3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 3.1. Check the categories of records held by a body that are available without a person having to submit a formal PAIA request.
- 3.2. Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- 3.3. Know the description of the records of the body which are available in accordance with any other legislation.
- 3.4. Access all the relevant contact details of the Information Officer and Deputy Information Officer (if applicable) who will assist the public with the records they intend to access.

- 3.5. Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 3.6. Know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 3.7. Know the description of the categories of data subjects and of the information or categories of information relating thereto.
- 3.8. Know the recipients or categories of recipients to whom the personal information may be supplied.
- 3.9. Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.
- 3.10. Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

#### 4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF LEGAL DYNAMIX (PTY) LTD

##### 4.1. Chief Information Officer

Name	Suman Barua
Telephone	+27 832763067
Email	info@legaldynamix.co.za
Fax	0866303007

##### 4.2. Not Applicable

##### 4.3. Access to information general contacts

Email	info@legaldynamix.co.za
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##### 4.4. National or Head Office

Postal Address	21 The Broads, Mulbarton, 2190, South Africa
Physical Address	21 The Broads, Mulbarton, 2190, South Africa
Telephone	+27 832763067
Email	info@legaldynamix.co.za
Website	www.legaldynamix.co.za

#### 5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1. The SAHRC has, in terms of section 10 of PAIA, compiled in each official language a guide containing information, in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA.

5.2. The Guide is available from the SAHRC. Please direct any queries in this regard to:

The South African Human Rights Commission: PAIA Unit	
The Research and Documentation Department	
South African Human Rights Commission	
Postal address	Private Bag X2700, Houghton, 2041
Telephone	+27 11 877-3600
Fax	+27 11 403-6025
Website	www.sahrc.org.za
Email	paia@sahrc.org.za

5.3. With effect from 1 July 2021, enforcement of PAIA will fall under the jurisdiction of the Information Regulator established in terms of POPIA.

5.4. The contact details for the Information Regulator are (at present) as follows:

The Information Regulator (South Africa)	
Physical address	33 Hoofd Street, Forum III, 3rd Floor Braampark
Postal Address	P.O Box 31533, Braamfontein, Johannesburg, 2017
Telephone number	+27 (0)10 023-5200 / +27 (0)82 746-4173
Website	<a href="https://www.justice.gov.za/inforeg/index.html">https://www.justice.gov.za/inforeg/index.html</a>
E-mail	inforeg@justice.gov.za / complaints.IR@justice.gov.za

## 6. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Information available on the Company's website [www.legaldynamix.co.za](http://www.legaldynamix.co.za).

## 7. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION AS CONTEMPLATED IN SECTION 51 (1) (D) OF THE ACT

7.1. The Company has or may have access to information or records relating to the following Acts:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Copyright Act 61 of 1978
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Pension Funds Act 24 of 1956
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013

- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- Skills Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- Stamp Duties Act 77 of 1968
- Tax on Retirement Funds Act 38 of 1996
- Trademarks Act 194 of 1993
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

7.2. Other records held by the Company:

- Memorandum of Incorporation of the Company and other Company documentation
- PAIA and POPIA manual
- Company policies and governance documents
- Website information and records
- Human resources records (payroll, employee records, employee contracts, etc)
- Financial records (invoices, payments, financial statements, tax returns including VAT, audit reports, accounting records, etc)
- Information systems (domain registrations, document and record systems, storage systems, usage statistics)
- Contracts/agreements with customers/clients, suppliers and service providers and related documentation (such as invoices, quotations, etc)

7.3. Where any information contained in any records retained by the Company in terms of the above legislation is of a public nature, such records may be available for inspection without a person having to request access thereto in terms of PAIA.

## 8. ACCESS TO RECORDS

- 8.1. Any requests for access to records of the Company are subject to PAIA and, in respect of personal information, POPIA.
- 8.2. In terms of PAIA, a request for access is to be made on the prescribed form accessible which is available as Annexure A to this Manual. The request is to be made to the Information Officer and addressed to the contact details set out above (section 53(1) of PAIA).
- 8.3. The requester must provide sufficient detail on the form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required and specify a postal address, fax number, or email address. The requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the requester and state the necessary particulars to be so informed (section 53(2)(a) and (b) and (c) and (e) of PAIA).

- 8.4. The requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right (section 53(2)(d) of PAIA).
- 8.5. In circumstances where the request for access is being made on behalf of another person, the requestor is obliged to prove the capacity in which the request is being made, with any submissions in support thereof being subject to the satisfaction of the Company (section 53(2)(f) of PAIA). Section 71 of PAIA makes provision for a request for information or records about a third party. In considering such a request, the Company will adhere to the provisions of sections 71 to 74 of PAIA. The requestor is to note the provisions of Chapter 5 of Part 3 of PAIA in terms of which the Company is obliged, in certain circumstances, to advise third parties of requests lodged in respect of information applicable to or concerning such third parties. In addition, the provisions of Chapter 2 of Part 4 of PAIA entitle third parties to dispute the decisions of the Company by referring the matter to the High Court.
- 8.6. The Information Officer will decide whether or not to grant the request as soon as is reasonably possible (but in any event within thirty days of the request having been submitted) and notify the requester accordingly.
- 8.7. The Information Officer may decide to extend the period of thirty days for another period of not more than thirty days if:
  - 8.7.1. The request is for a large number of records.
  - 8.7.2. The search for the records is to be conducted at premises not situated in the same town or city as the head office of the Company.
  - 8.7.3. Consultation among divisions or departments, as the case may be, of the Company is required.
  - 8.7.4. The requester consents to such an extension in writing.
  - 8.7.5. The parties agree in any other manner to such an extension.

Should the Company require an extension of time, the requester shall be informed in the manner stipulated in the prescribed form of the reasons for the extension.

- 8.8. If the Information Officer fails to respond (or extend the period within which to respond) within thirty days after a request has been received, it will, in terms of PAIA, be deemed to have refused the request (section 58 read together with section 56(1) of PAIA).
- 8.9. Where access is granted:
  - 8.9.1. The Information Officer will advise the requester of:
    - a) The access fee to be paid for the information (in accordance with fees as per Section 8) prior to the Company being able to process the request and grant the access (section 54(1) of PAIA).
    - b) The format in which access will be given.
    - c) The fact that the requester may lodge an appeal with a court of competent jurisdiction against the access fee charged or the format in which access is to be granted (section 56(2) of PAIA).



8.9.2. Access to the record requested will be given as soon as reasonably possible.

8.10. The following access and reproduction fees apply:

8.10.1. The request fee payable by a requester, other than a personal requester (being a requester who seeks access to a record containing personal information about that requester) is R50.00. The requester may lodge an application to the court against the tender or payment of the request fee (section 54(3)(b) of PAIA); and

8.10.2. Where the Information Officer is of the opinion that the number of hours required to search, reproduce and/or prepare the information requested will exceed six hours, it may require that a deposit be paid, calculated in accordance with PAIA.

8.10.3. Access and Reproduction fees respectively:

For every photocopy of an A4 size page or part thereof	R1.10
For every printed copy of an A4 size page or part thereof	R0.75
For a copy of a compact disc	R70.00
For a transcript of visual images for an A4 size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcript of an audio record, for an A4 size page or part thereof	R20.00
For a copy of an audio record	R30.00

8.11. If the request for access is refused, the Information Officer shall advise the requester in writing of the refusal, including adequate reasons for the refusal and that the requester may lodge an appeal with a court of competent jurisdiction against the refusal of the request (section 56(3) of PAIA).

8.12. The Company may refuse to grant access on certain grounds, including the following (Part 3, Chapter 4 of PAIA):

8.12.1. That the record constitutes privileged information for the purposes of legal proceedings or is subject to professional or legal privilege.

8.12.2. To protect the commercial information or the confidential information of a third party and/or the Company.

8.12.3. That it is necessary to protect the safety of individuals or property.

8.12.4. That it is necessary to protect the research information, intellectual property rights or other proprietary information of a third party and/or the Company.

8.12.5. That granting access would result in the unreasonable disclosure of personal information of a third party.

8.12.6. The requestor has failed to demonstrate a recognised interest to the information or does not have a right to such information.

8.13. Upon the refusal by the Information Officer, any deposit paid by the requester will be refunded.

8.14. If a record cannot be found or if the records do not exist, the Information Officer shall notify the requestor accordingly, and provide full details of measures taken to locate the said records or to determine its existence.

8.15. The requester may lodge an appeal with a court of competent jurisdiction against any process set out in this section 8 of this manual.

## 9. PROCESSING OF PERSONAL INFORMATION

9.1. POPIA establishes the framework for the processing of personal information of both natural persons and juristic persons. Chapter 3 of POPIA provides for the minimum conditions for lawful processing of personal information by a responsible party (as such terms are defined under POPIA). Such conditions may not be deviated from unless specific requirements are met under POPIA. The main principles of POPIA are:

- **Accountability.** The Company as the 'responsible party' (as defined in POPIA) is responsible for the lawful processing of personal information in accordance with the Act.
- **Processing limitation.** Fair and lawful manner.
- **Purpose specification.** Use of personal information for defined purposes only.
- **Information quality.** The information is accurate and complete.
- **Openness.** To ensure processing of any personal information is done in a fair and transparent manner.
- **Security safeguards.** Adequate safeguards to protect personal information.
- **Data subject participation.** Allowing data subjects to access and/or request the correction or deletion of any personal information held about them that may be inaccurate, misleading or outdated.

9.2. **Personal information processed by the Company.** The Company requires personal information relating to both natural and legal persons to carry out its business and organisational functions.

9.3. The manner in which this information is processed and the purpose for which it is processed is determined by the Company. Accordingly, the Company is a responsible party for the purposes of POPIA and will ensure that the personal information of a 'data subject' (as defined in POPIA), amongst other things as prescribed by POPIA, is processed in accordance with the principles set out above and that it:

9.3.1. Will not be kept for longer than necessary.

9.3.2. Is processed in accordance with integrity and confidentiality principles – this includes physical and organisational measures to ensure that personal information, in both physical and electronic form, is subject to an appropriate level of security when stored, used and communicated by the Company, to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage.

9.3.3. Is processed in accordance with the rights of data subjects, where applicable.

9.4. In terms of POPIA, the data subject has the right to:

9.4.1. Be notified that their personal information is being collected by the Company.

9.4.2. Be notified in the event of a data breach.

- 9.4.3. Know whether the Company holds personal information about them and to access that information and any request for information must be handled in accordance with the provisions of this PAIA Manual.
  - 9.4.4. Request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information.
  - 9.4.5. Object to the Company's use of their personal information and request the deletion of such personal information (deletion would be subject to the Company's record-keeping requirements in terms of its legitimate interests and/or applicable laws.
  - 9.4.6. Object to the processing of personal information for purposes of direct marketing by means of unsolicited electronic communications.
  - 9.4.7. Complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.
- 9.5. **Purpose of the Processing of Personal Information by the Company.** The purpose for which the Company processes or will process personal information is set out in section A of Annexure B to this Manual, provided however that this is not an exhaustive list.
- 9.6. **Categories of Data Subjects and Personal Information relating thereto.** The various categories of Data Subjects that the Company processes personal information in respect of and the types of personal information relating thereto includes but is not limited to those detailed in section B of Annexure B to this Manual.
- 9.7. **Sharing of Personal Information.** The Company may share a data subject's Personal Information in accordance with section C of Annexure B to this Manual.
- 9.8. **Cross-border flows of Personal Information.** Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:
- 9.8.1. Recipient country can offer such data an 'adequate level' of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA.
  - 9.8.2. Data subject's consent to the transfer of their personal information.
  - 9.8.3. Transfer is necessary for the performance of a contractual obligation between the data subject and the responsible party.
  - 9.8.4. Transfer is necessary for the performance of a contractual obligation between the responsible party and a third party, in the interests of the data subject.
  - 9.8.5. The transfer is for the benefit of the data subject, and it is not reasonably practicable to obtain the consent of the data subject, and if it were, the data subject, would in all likelihood provide such consent.

Planned cross-border transfers of personal information and their justifications includes but is not limited to those detailed in section D of Annexure B to this Manual.

- 9.9. **Description of information security measures to be implemented by the Company.** Section E of Annexure B to this Manual sets out the types of security measures to be implemented by the Company to ensure that personal information is respected and protected. This is not an

exhaustive list and is subject to change. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by the Company may be conducted to ensure that the personal information that is processed by the Company is safeguarded and processed in accordance with the Conditions for Lawful Processing under POPIA.

- 9.10. **Objection to the Processing of Personal Information by a Data Subject.** Section 11(3) of POPIA and regulation 2 of the POPIA Regulations provides that a data subject may, at any time object to the processing of his/her/its personal information in the prescribed form attached to this manual as Annexure C subject to exceptions contained in POPIA.
- 9.11. **Request for correction or deletion of Personal Information.** Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a data subject may request for their personal information to be corrected/deleted in the prescribed form attached as Annexure D.

## 10. AVAILABILITY OF THE MANUAL

- 10.1. A copy of the Manual is available:
- 10.1.1. On the Company's website.
  - 10.1.2. At the head office of the Company for public inspection during normal business hours and on prior agreed appointment.
  - 10.1.3. To any person upon request and upon the payment of a reasonable prescribed fee.
  - 10.1.4. To the Information Regulator or SAHRC upon request.
- 10.2. A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## 11. UPDATING OF THE MANUAL

The head of the Company will on a periodic basis update this manual should the need arise.

ANNEXURE A  
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY  
(Section 53(1) of the Promotion of Access to Information Act, 2000  
(Act No. 2 of 2000)  
[Regulation 10]

A. Particulars of private body

The Head
----------

B. 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 to which the information is to be sent must be given.
- c) Proof of the 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 request is made, when made on behalf of another person	

C. Particulars of person on whose behalf request is made

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

Full names and surname
Identity number

D. Particulars of record

- a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
  - b) If the space provided is inadequate, continue on a separate folio and attach it to this form.
- The requester must sign all the additional folios.

Description of record or relevant part of the record
Reference number, if available
Any further particulars of record

## E. Fees

- a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- b) You will be notified of the amount required 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 from payment of fees
---

## F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in **1 to 4 hereunder**, state your disability and indicate in which form the record is required.

Disability	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 in certain circumstances. In such a case you will be informed if access will be granted in another form.
- c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.

<b>If the record is in written or printed form</b>			
	copy of record*	inspection of record	
<b>If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</b>			
	view the images	copy of the images	transcription of the images*
<b>If the record consists of recorded words or information which can be reproduced in sound</b>			
	listen to the soundtrack	transcription of soundtrack* (written or printed document)	
<b>If record is held on computer or in an electronic or machine-readable form</b>			
	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 the copy or transcription to be posted to you? (Postage is payable)			YES      NO

### G. Particulars of right to be exercised or protected

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

Indicate which right is to be exercised or protected
Explain why the record requested is required for the exercise or protection of the right

### H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/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 \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
*Signature of requester/person on whose behalf request is made*

## ANNEXURE B

### A. Purpose of processing

The purposes for which the Company processes personal information includes but is not limited to:

- a) Rendering of services to our clients.
- b) Employee administration.
- c) Transacting with our suppliers and third party service providers.
- d) Maintaining records.
- e) General administration.
- f) Financial requirements.
- g) Compliance with legal and regulatory requirements.

### B. Categories of data subjects and associated personal information

Data subject	Personal Information processed
Employees	The Company's only employee is its' owner. Relevant information held by the Company (not all of which necessarily applies): name, surname, SA ID number, contact details, physical and postal address, date of birth, age, marital status, race, employment history, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension/ provident fund information), employee disability information, employee pension and provident fund information, employee contracts, payroll records, health and safety records, training records, employment history, time and attendance records.
Clients	Natural persons: name, surname, SA or other ID number/passport details, information required for FICA compliance, contact details, physical and postal address  Legal persons: Entity name, registration number, VAT number, contact details for representative persons, FICA documentation
Suppliers and service providers	Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, B-BBEE certificates, invoices, agreements. In the case of natural persons name, surname, ID number, address and contact information, BEE information.
Directors and shareholders	Name, surname, ID numbers, other information as required for reporting purposes
Website visitors/users	Name, email address, company name, job title and telephone number



### C. Sharing of personal information

The Company does not share personal information generally speaking but may share personal information with:

- a) Service providers who perform services on behalf of the Company.
- b) For the fulfilment of agreements we have with clients and service providers.
- c) To comply with applicable laws and regulations.

### D. Cross border transfers of personal information

The Company will not transfer personal information outside of South Africa but where required it will do so with the consent of the relevant person(s) or where permitted under applicable laws or in fulfilment of agreements.

Where personal information is transferred outside of South Africa, the Company will take steps to ensure that such transfer is subject to laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

### E. Information Security Measures

The Company implements and maintains reasonable technical measures to protect personal information, including procedures and controls aimed at preventing any unauthorised access to, loss or destruction of personal information.

The Company has and will continue to take steps to ensure that third party providers who process personal information on behalf of it apply appropriate safeguards in compliance with POPIA.

## ANNEXURE C

### Objection to the Processing of Personal Information in terms of Section 11(3) of POPI by a Data Subject

Regulations relating to the protection of Personal Information, 2018 (Regulation 2)

Notes:

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	
Contact number(s)	
Fax number/E-mail address	
B. DETAILS OF RESPONSIBLE PARTY	
Name(s) and surname/ Registered name of Data Subject	
Residential, postal or business address	
Contact number(s)	
Fax number/Email address	
C. REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(D) TO (F) (Please provide detailed reasons for the objection)	

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
*Signature of data subject/designated person*

## ANNEXURE 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 POPI

Regulations relating to the protection of Personal Information, 2018 (Regulation 3)

Notes:

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	

<b>A. DETAILS OF DATA SUBJECT</b>	
Name(s) and surname/ Registered name of Data Subject	
Unique identifier/Identity Number	
Residential, postal or business address	
Contact number(s)	
Fax number/E-mail address	
<b>B. DETAILS OF RESPONSIBLE PARTY</b>	
Name(s) and surname/ Registered name of Data Subject	
Residential, postal or business address	
Contact number(s)	
Fax number/Email address	
<b>C. INFORMATION TO BE CORRECTED/DELETED/DESTRUCTED/DESTROYED</b>	
<b>D. REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. (Please provide detailed reasons for the request)</b>	

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
Signature of data subject/designated person