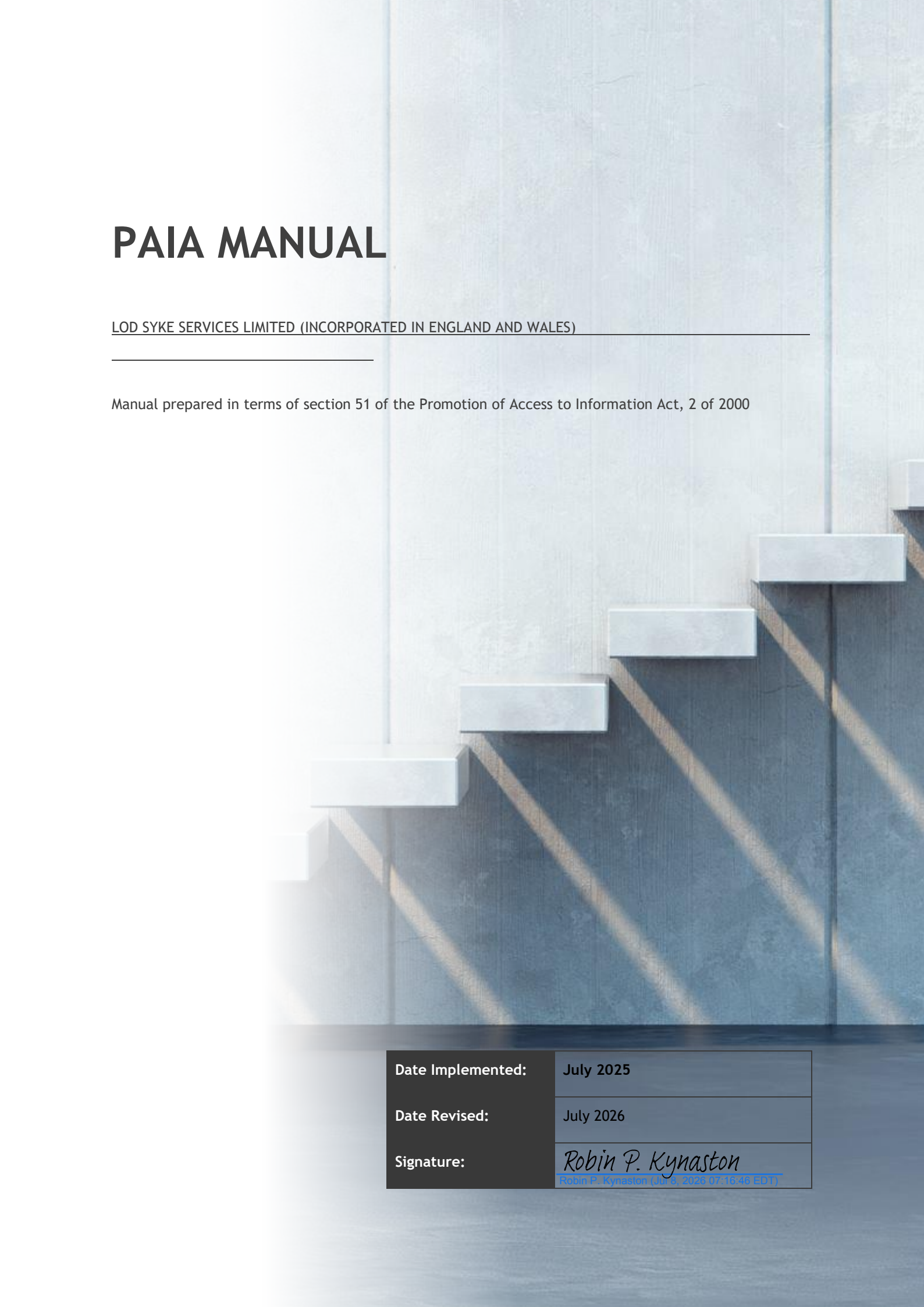
PAIA MANUAL

LOD SYKE SERVICES LIMITED (INCORPORATED IN ENGLAND AND WALES)

Manual prepared in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000



Date Implemented:	**July 2025**
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1 DEFINITIONS, ACRONYMS AND ABBREVIATIONS

1.1 Terms and expressions used in this document shall have the same meanings associated to them as defined in this clause one, and where not defined unless the context clearly provides otherwise, shall have the respective meanings assigned to them as set out in POPIA and PAIA.

1.2	“Company” (Registration 2022/408129/10	LOD SYKE SERVICES LIMITED (INCORPORATED IN ENGLAND AND WALES) Number:
1.3	“Head of Business"	means as defined in POPIA and PAIA which includes the Chief Executive Officer (CEO), Managing Director (MD) or officer of similar designation from time to time and whose particulars are stated on page 5 of this PAIA manual.
1.4	" Information Officer"	Information Officer designated by the Head of Business of the Company in terms of PAIA and POPIA.
1.5	"PAIA"	Promotion of Access to Information Act No. 2 of 2000 inclusive of any amendments and regulations thereto from time to time;
1.6	“PAIA Manual”	Means this Manual of the Company prepared in terms of section 51 of PAIA and as may be amended from time to time;
1.7	"POPIA"	Protection of Personal Information Act No. 4 of 2013 inclusive of any amendments and regulations thereto from time to time; and
1.8	"Regulator"	Information Regulator South Africa.

2 PURPOSE OF MANUAL

This PAIA Manual is useful for the public to:

2.1 See the categories of records held by the body which are available without a person having to submit a formal PAIA request;

2.2 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;

2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 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;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 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; and

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3 CONTACT PARTICULARS

Company Website Address:	www.consilio.com
Telephone Number:	+2700213006677
Email Address:	privacy@consilio.com
S.A. Head Office Physical Address:	2nd Floor Roamwork 50 Harrington Street Cape Town 7925
S.A. Head Office Postal Address:	2nd Floor Roamwork 50 Harrington Street Cape Town 7925

Details:	Information Officer	Head of Business
Name:	Robin Power Kynaston	Andrew Macaulay
Telephone Number:	+1 202-822-6222	+44 20 36 950200
E-mail Address:	privacy@consilio.com	uklegal@consilio.com

ACCESS TO THE PUBLIC GUIDE ON HOW TO USE PAIA AND POPIA

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The Guide is available in each of the official languages and in braille.

4.2.1 The aforesaid Guide contains the description of the objects of PAIA and POPIA, the postal and street address, phone and fax number and, if available, electronic mail address of-

4.2.1.1 the Information Officer of every public body, and

4.2.1.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

4.2.2 the assistance available from the information officer of a public body in terms of PAIA and POPIA;

4.2.3 the assistance available from the Regulator in terms of PAIA and POPIA;

4.2.4 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.2.4.1 an internal appeal;

4.2.4.2 a complaint to the Regulator; and

4.2.4.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

4.2.5 the provisions of sections 14[5] and 51[8] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.2.6 the provisions of sections 15[1] and 52[2] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.2.7 the notices issued in terms of sections 22[1] and 54[2] regarding fees to be paid in relation to requests for access; and

4.2.8 the regulations made in terms of section 92[11].

4.3 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.4 The Guide can also be obtained-

4.4.1 upon request to the Information Officer;

4.4.2 from the website of the Regulator (https://inforegulator.org.za) or https://inforegulator.org.za/paia-guidelines/

4.5 A copy of the Guide is also available in English at the Company's principal office together with a copy of this PAIA Manual and relevant forms described in 5 below, for public inspection during normal office hours.

4.6 The contact details of the Information Regulator are:

Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Website:	https://inforegulator.org.za/
General Enquiries Email:	enquiries@inforegulator.org.za
Complaints Email:	PAIAComplaints@inforegulator.org.za



5 REQUEST FOR ACCESS TO INFORMATION

5.1 Information which is not readily available as indicated in this manual, may be requested in accordance with the procedure prescribed in terms of PAIA and as set out below.

5.2 A person who wants access to the Company's records that are not readily available must complete the necessary request forms that is available at the offices of Company at request to the Information Officer, or which forms may be accessed and downloaded on https://inforegulator.org.za/paia-forms/. The completed request form must be sent to the address or email address provided in this manual and marked for the attention of the Information Officer. For the purpose of clarity, the following forms are accessible through the aforesaid website link and may be used for the purpose of requesting information from the Company as may be applicable:

- Form 01: Request for a Copy of the Guide from an Information Officer [Regulations 3]
- Form 02: Request for Access to Record [Regulation 7]
- Form 03: Outcome of request and of fees payable [Regulation 8]
- Form 04: Internal Appeal Form [Public Bodies only, Regulation 9]

5.3 It shall remain the responsibility of the person completing the forms to verify and use the latest published versions of the applicable forms as published by the Information Regulator on their website from time to time.

5.4 When completing the forms set out above, please provide sufficient details to enable the Company to identify:

5.4.1 The record(s) requested;

5.4.2 The requester (and if an agent is lodging the request, proof of capacity);

5.4.3 The form of access required;

5.4.4 The postal address or fax number of the requester in the Republic;

5.4.5 If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof; and

5.4.6 The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

5.5 Requests for information must be made in accordance with the prescribed PAIA procedures and at the rates provided in terms of Regulations 6 and 7 of PAIA.

5.6 Information of the Company listed in this manual does not mean that the information will be made available to a person requesting it. The Company retains its rights to refuse a request for information should any of the grounds of refusal as set out in Chapter 4 of PAIA exist. Requests for access will be evaluated on a case-by-case basis in accordance with PAIA.

6 INFORMATION AUTOMATICALLY OR PUBLICLY AVAILABLE

The following published information is readily available to the public and may be obtained from the Company without a person having to request access:

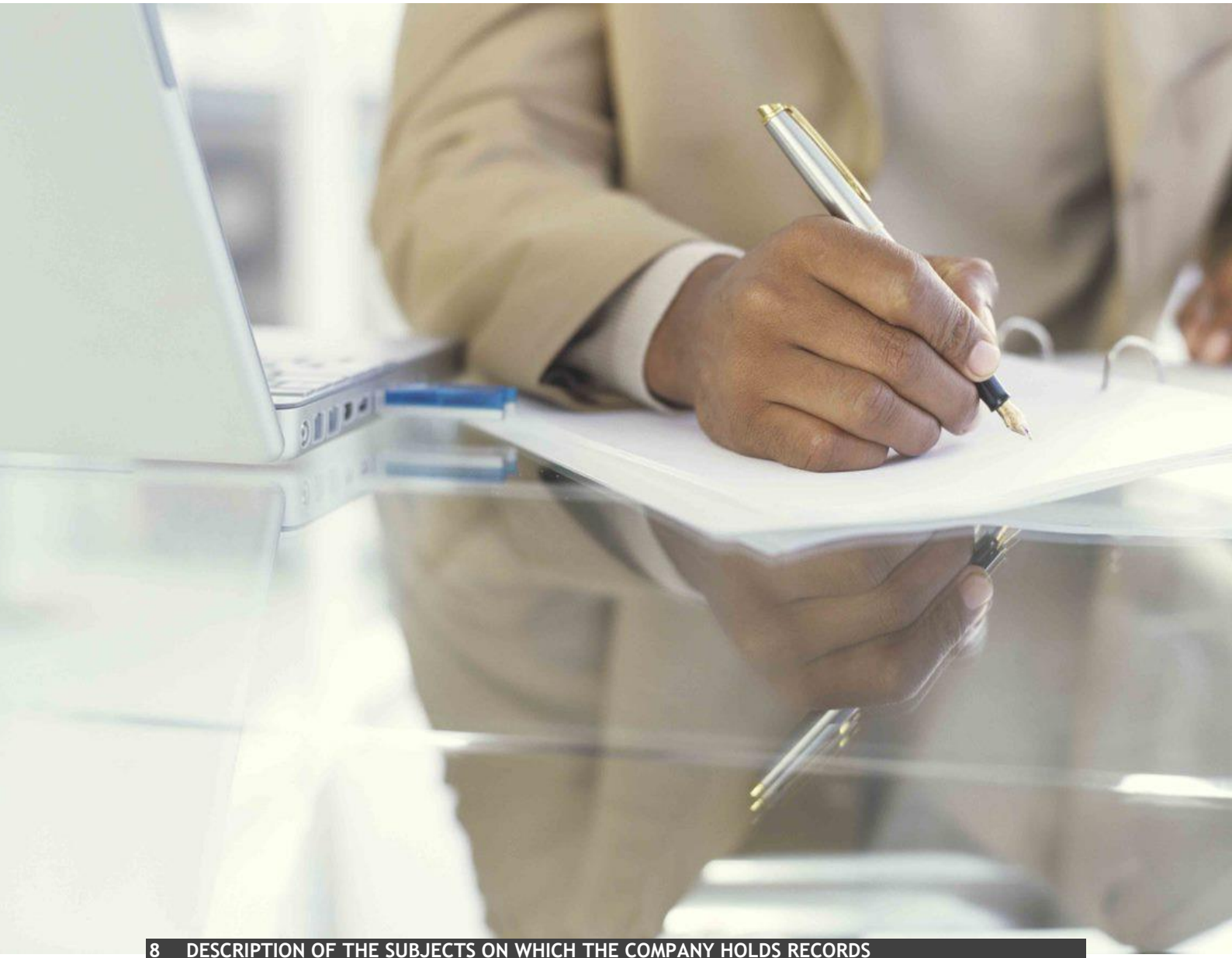
6.1 Information and documents set out on the Company's website described in the contact particulars section of this manual.

7 INFORMATION AVAILABLE IN TERMS OF OTHER APPLICABLE LEGISLATION

The Company retains and processes information and records required of in terms of local and, if applicable, international legislation, statutory laws and regulations where applicable to the Company, which may include but is not limited to records pertaining to the following legislation:

- Basic Conditions of Employment Act 75 of 1997
- Broad-based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of the Republic of South Africa Act 108 of 1996
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Customs and Excise Act 91 of 1964
- Electronic Communications Act 36 of 2005
- Electronic Communications and Transactions Act, 25 of 2002
- Employment Equity Act 55 of 1998
- Employment Services Act 4 of 2014
- Employment Tax Incentive Act 26 of 2013
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Independent Communications Authority of SA Act 13 of 2000 (ICASA)
- Intellectual Property Laws Amendment Act 28 of 2013
- Insurance Act, 18 of 2017
- Occupational Health and Safety Act 85 of 1993
- Labour Relations Act 66 of 1995
- Long-term Insurance Act 52 of 1998
- National Credit Act 34 of 2005
- National Environmental Management Act 107 of 1998
- Patents Act 57 of 1978
- Pension Funds Act 24 of 1956
- Prevention and Combatting of Corrupt Activities Act 12 of 2004
- Promotion of Access to Information Act 2 of 2000

- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Levies Act 9 of 1999
- Skills Development Act 97 of 1998
- South African Revenue Services Act 34 of 1997
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991



8 DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS

The Company retains and processes various categories of records and information relevant to the function of its business, administration, infrastructure, and legal persona, which may include but is not limited to

the following categories:

Administration and Statutory Records
- Attendance registers
- Correspondence
- Founding / Statutory Documents
- Licences, Permits
- Minutes and Recordings of Management, Staff, Governing Bodies and shareholder / Member Meetings
- Company Director, Shareholder/Member and Statutory Registers
- Organizational Policies, Procedures and Codes of Conduct
Human Resource Records
- Conditions of Service
- Employee Records
- Employment Contracts
- Employment Equity Records
- General Correspondence
- Industrial and Labour Relations Records
- Information relating to Health and Safety Regulations
- Pension and Provident Fund Records
- Performance Appraisals
- Personnel Guidelines, Policies and Procedures
- Remuneration Records and Policies
- Salary Surveys
- Skills Requirements
- Staff Recruitment Policies
- Statutory Records
Training Records
Fixed Property
-Leases / Title Deeds
Operation Records
- Brochures and Marketing Publications
- Client and Customer Registry and Particulars
- General and Confidential Correspondence
- Employee Sales Performance, historical and Work-In-Progress
- Marketing, Strategies and Marketing Records
- Production Records
- Sales Records
- Suppliers Registry
Finance Records
- Annual Financial Statements
- Asset Register

- Banking, Financial and Accounting Records
- Budgets
- Contracts
- Employment Equity
- General Correspondence
- Insurance Information, Policies and Claims
- Internal Audit Records
- Management Accounts
- Purchase and Order Information
- Stock Records
- Tax Records (company and employee)

Information Technology Records

- IT Policies and Procedures
- Network Diagrams
- User Manuals
- Agreements and Licenses
- Audits and Audit Trails
- User Access Information
- Client and Supplier Databases
- General Infrastructure, network usage and operational system deployment and development

Intellectual Property

- Agreements relating to intellectual property
- Copyrights
- Litigation and other disputes involving intellectual property
- Patents, patent applications and inventions
- Designs, trademarks, trade names and protected names

Legal, Agreements and Contracts

- Acquisition or disposal documentation
- Agreements with and related to contractors, suppliers, distributors, dealers, agencies, clients, customers, governmental agencies, shareholders, officers or directors and other matters relating to the provision of services or materials.
- Complaints, pleadings, briefs and other documents pertaining to actual, pending or threatened litigation, arbitration or investigation
- Joint venture agreements, partnership agreements, participation, franchise, co-marketing, co-promotion or other alliance agreements

9 CATEGORIES OF DATA SUBJECTS

The Company retains information and records on its engagements with all its stakeholders, whether natural or juristic persons, which may include but is not limited to prospective, existing, and former:

9.1 Clients, customers and their employees, representatives, agents, contractors and service providers;

9.2 Employees (including contractors, agents, temporary and casual employees);

9.3 Suppliers, service providers, business partners and their respective authorised employees, representatives, agents, contractors and service providers of such suppliers and service providers;

9.4 Visitors (walk in) and other persons that make enquiries with the Company from time to time physically at the Company's offices or electronically through the Company's website and other media access mediums; and

9.5 Group Companies and their employees, representatives, agents, contractors and service providers;

10 CATEGORIES OF PERSONAL INFORMATION PROCESSED

10.1 The Company processes and stores various categories of personal information on its data subjects where relevant for the purpose of fulfilling its businesses' function, objectives, administration, services and products as well as maintaining its legal, compliance and financial reporting requirements, inclusive but not limited to the following types of personal information:

- Authorised signatories, beneficiaries, governing body members and ultimate beneficial owners
- BBBEE information
- Confidential correspondence
- Offences / alleged offences
- Financial, transactional, and banking information
- Founding documents
- Employee Medical, dental and health related information
- Trade union membership of employees
- Educational background information, qualifications, and employment history
- Names of contact persons and representatives
- Age, Gender, Nationality and ethnic origin information
- Online identifier or other particular assignment to the person
- Names, ID / Passport / Registration Numbers, email, physical and postal addresses together with other contact particulars;
- Tax related information;
- personal opinions, views or preferences

11 PURPOSE OF PROCESSING PERSONAL INFORMATION

11.1 Personal information is processes and stored by the Company on its data subjects where relevant for the purpose of fulfilling its businesses' function, objectives, administration, services and

products as well as maintaining its legal, compliance and financial reporting requirements. Such processing activities and records may be pursuant to purposes of including but not limited to:

- To manage information, products and/or services requested by and provided to by data subjects
- To help us identify data subjects when they contact us
- To manage our customers and clients and to maintain their records
- Recruitment purposes
- Employment purposes
- Apprenticeship purposes
- Training purposes
- Travel purposes
- General administration
- Financial and tax purposes
- Legal or contractual purposes
- Health and safety purposes
- To monitor access, secure and manage our premises and facilities
- To transact with our suppliers
- To improve the quality of our products and services
- To help us detect and prevent fraud and money laundering under FICA
- To help us recover debts
- Marketing purposes
- Engaging with the public
- Travel and accommodation

12 RECIPIENTS WITH WHOM PERSONAL INFORMATION IS SHARED

12.1 In processing personal information, we may share it within our group of companies or with other third parties. These include but are not limited to:

- Statutory authorities
- Law enforcement agencies
- Tax authorities
- Medical schemes
- Employee pension and provident funds
- Industry bodies
- Contractors, vendors, or suppliers
- Payment processors, debt collection agencies
- Email management, electronic transmission and distribution tools, servers, and service providers, data storage providers and server hosts
- Group companies
- Agents
- Service providers
- Banks and other financial institutions.
- Employees of the organisation
- Employment and recruitment agencies
- Family, associates and representatives of the person whose personal information is processed
- Third party verification agencies and credit bureau
- Trade unions where employees are represented by such

13 TRANSBORDER FLOWS OF PERSONAL INFORMATION

13.1 The Company may transfer to, and store personal information we collect on our data subjects, in countries other than South Africa, if the relevant business transactions or situation requires trans-

border processing of information, data sharing with international group companies or for the purposes of cloud, back up and other data storage requirements. Where countries may not have the same or higher data protection laws as South Africa, the Company will only transfer the information if we have consent of the data subject, or if it is necessary for the performance or conclusion of a contract between the Company and the data subject.

14 PERSONAL INFORMATION SECURITY MEASURES, DATA BREACHES AND THIRD PARTIES

14.1 The Company has identified its security risks over the personal information that it processes in line with POPIA and have implemented various security measures to ensure reasonable protection against the risk of loss, misuse, unauthorised access and disclosure, alteration and destruction of the personal information. We also take steps to ensure that operators that process personal information on behalf of the Company apply adequate safeguards.

14.2 Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, the Company shall notify the Regulator and the data subject, unless the identity of such data subject cannot be established. The notification will be made as soon as reasonably possible after the discovery of the compromise, considering the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the responsible party's information system.

14.3 When the Company receives personal information from a third party on behalf of a data subject, it assumes confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual, and do not have any objection to our processing their information in accordance with this manual. Where information on third parties is provided by a data subject, or a third party provides information on a data subject, that information may be considered with other personal information.

14.4 The above provisions on data protection must be read together with the Company's internal policies on data protection, including the Website Privacy Notice (https://www.consilio.com/en-gb/privacy-policy) and Global Data Protection Privacy Notice for Recruitment and Engagement (https://cdn.prod.website-files.com/66e828df6d32fd6e58bfaeca/67f59d0bd8795991616ceaeb_8526b1f738a88eda03ff68c51c340ecb_global-privacy-notice-april-2025.pdf) ("Consilio Policies"). The provisions of the Consilio Policies will prevail over the provisions of this Manual unless the provision of the Manual reflects or is required to comply with a statutory or legal obligation in South Africa.

15 AVAILABILITY OF MANUAL

15.1 A copy of the Manual is available-

15.1.1 on our website, if any;

15.1.2 head office of the body for public inspection during normal business hours;

15.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

15.1.4 to the Information Regulator upon request.

15.2 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.

16 REMEDIES

16.1 The Company does not have an internal appeal procedure that may be followed after a request to access personal information by a data subject is denied, the decision by the Information Officer and Deputy Information Officers of the Company shall be final. In the event that a person is not satisfied with the outcome of the decision following a request for information such person is entitled to apply to a court of competent jurisdiction to take the matter further.

16.2 A third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction if they are affected by a request for information from another person that was approved by the Information Officer and Deputy Information Officers as set out in this manual.

17 UPDATING OF MANUAL

17.1 The Company reserves the right to update this manual regularly from time to time as it deems fit and only the latest published version of this manual may be utilised.



LOD SYKE SERVICES LIMITED (INCORPORATED IN ENGLAND AND WALES) Draft PAIA Manual

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