



PAIA AND POPIA MANUAL

Waggener Edstrom Worldwide (Pty) Limited

Last updated: 15 July 2025

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000, to address the requirements of the Protection of Personal Information Act, 2013.

1. INTERPRETATION

In this document, clause headings are for convenience and shall not be used in its interpretation unless the context clearly indicates otherwise.

1.1. an expression which denotes –

1.1.1. any gender includes the other genders;

1.1.2. natural person includes an artificial or juristic person and *vice versa*; and

1.1.3. the singular includes the plural and *vice versa*.

1.2. any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation, or other legislation as at the signature date, and as amended or substituted from time to time;

1.3. if any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this document;

1.4. where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day;

1.5. any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months, or years, as the case may be;

- 1.6. the use of the word "including" followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and the *eiusdem generis* rule shall not be applied in the interpretation of such general wording or such specific example/s;
- 1.7. insofar as there is a conflict in the interpretation of or application of this document and the Act, the Act shall prevail; and
- 1.8. this document does not purport to be exhaustive of or comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarise his/her/itself with the provisions of the Act before lodging any request with the company.

2. DEFINITIONS

The following expressions shall bear the meanings assigned to them below and cognate expressions bear corresponding meanings:

- 2.1. **"Act"** – means the Promotion of Access to Information Act 2 of 2000, as amended from time to time, and any regulations, as may be amended or replaced from time to time;
- 2.2. **"Company"** – means Waggener Edstrom Worldwide (Pty) Ltd, a company duly incorporated under the laws of the Republic of South Africa under registration number 2009/019567/07 and with registered address at BDO Building, Wanderers Office Park, 52 Corlett Drive, Illovo, Gauteng, 2196;
- 2.3. **"Data Subject"** – means the person to whom the personal information relates;
- 2.4. **"Information Officer"** – means the person authorised to handle requests for information in terms of the Act and identified in clause 8;

- 2.4. **“Personal Information”** – means information relating to an identifiable, living, natural person, or an identifiable, existing juristic person, as defined in POPIA;
- 2.5. **“POPIA”** – means the Protection of Personal Information Act, 2013, as amended from time to time, and any regulations, as may be amended or replaced from time to time;
- 2.6. **“Processing”** – means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;
- 2.7. **“Request Liaison Officer”** – means the person duly authorized, from time to time, by the head of the company and appointed by the company to facilitate or assist the head of the company with any request in terms of the Act; and
- 2.8. **“this document”** – means this PAIA manual together with all of its annexures, as amended from time to time.

3. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT

- 3.1. The Act was enacted on 3 February 2000, giving effect to the constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa, 1996 (the “Constitution”) of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.
- 3.2. In terms of section 51 of the Act, all Private Bodies are required to compile an Information Manual (“PAIA Manual”).

3.3. Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements, except where the Act expressly provides that the information may be adopted when requesting information from a public or private body.

4. AIM OF THE MANUAL

4.1. The purpose of this document is to ensure that the Company complies with the Act and promotes the right of access to information, fosters a culture of transparency and accountability within the Company by giving the right to information required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.

4.2. To promote effective governance of private bodies, it is necessary to ensure that all persons are empowered and educated so that they may understand their rights in relation to public and private bodies.

4.3. Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

4.3.1. the reasonable protection of privacy;

4.3.2. commercial confidentiality; and

4.3.3. effective, efficient, and good governance,

and in a manner which balances that right with any other rights, including rights contained in the Bill of Rights in the Constitution.

- 4.4. This document shall be updated on a regular basis, as and when required, as per Section 51(2) of the Act.

5. ACCESS TO THE MANUAL

- 5.1. This document is available as follows:

- 5.1.1. at the premises of the Company, at 33 Baker Street, 4th Floor Standard Bank Building East Side, Rosebank, 2196;
- 5.1.2. at the premises of the Company's Information Officer, at Building 1, 152 Bryanston Drive, Bryanston, Sandton, 2191;
- 5.1.3. on the website of the Company, being <https://www.worldwide.com/connect/emea/johannesburg>; and
- 5.1.4. on request, which should be made on the prescribed form, a copy of which is attached hereto as Annexure "A".

6. CONTACT DETAILS OF THE MANAGING DIRECTOR (SECTION 51(1)(a))

Managing Director:	Sarah Gooding
Registered Address:	BDO Building, Wanderers Office Park, 52 Corlett Drive, Ilovo, Gauteng 2196
Postal Address:	33 Baker Street, 4 th Floor Standard Bank Building East Side, Rosebank, 2196

Telephone Number:	084-556-5969
Email Address:	sgooding@wecommunications.com

7. THE INFORMATION OFFICER (SECTION 51(1)(a))

- 7.1. The Act prescribes the appointment of an Information Officer for private bodies where such Information Officer is responsible to, *inter alia*, assess requests for access to information. The head of a Private Body, or his/her chosen representative, fulfils such a function in terms of section 51. The Company has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act.
- 7.2. The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the POPIA. After registering with the Information Regulator, the Information Officer oversees the functions and responsibilities as required in terms of both the Act and the duties and responsibilities imposed in terms of section 55 of the POPIA.
- 7.3. The Information Officer may appoint, where necessary, Deputy Information Officers, in terms of Section 17 of the Act as well as Section 56 of the POPIA. This affords the Company the opportunity to be as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities in terms of section 55 of the POPIA.
- 7.4. All requests for information in terms of the Act must be addressed to the Information Officer, the details of which are below.

8. CONTACT DETAILS OF THE INFORMATION OFFICER

Information Officer:	Caitlin Gottschalk
Postal Address:	Building 1, 152 Bryanston Drive, Bryanston, Johannesburg, 2191.
Cellphone Number:	(+27) 82 604 6391
Email address:	caitlin@gotts-law.com

9. GUIDE OF SOUTH AFRICAN HUMAN RIGHTS COMMISSION (SECTION 51(1) (b))

- 9.1. The Act grants a requester access to records of a Private Body, if the record is required for the exercise or protection of any rights.
- 9.2. Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided in the Act.
- 9.3. Requesters are referred to the Guide in terms of Section 10 of the Act which has been compiled by the South African Human Rights Commission ("SAHRC").
- 9.4. The Guide contains such information as may reasonably be required by a person exercising any right contemplated in the Act and accordingly includes:
 - 9.4.1. its objectives and the particulars of every Public and Private Body;
 - 9.4.2. information for the purposes of exercising and protecting rights;

9.4.3. information on how to understand and make use of the Act;

9.4.4. information on the manner and form of how to make requests; and

9.4.5. contents of the regulations promulgated under the Act.

9.5. The Guide is available in all the official languages of the Republic of South Africa and shall be updated every 2 (two) years.

9.6. Any enquiries regarding the Guide should be directed to the SAHRC on the contact details below:

Contact Body:	The South African Human Rights Commission
Physical Address:	27 Stiemens Street, Braamfontein, Johannesburg, 2001.
Postal Address:	27 Stiemens Street, Braamfontein, Johannesburg, 2001.
Telephone Number	011 877 3600
Email address:	GautengComplaints@sahrc.org.za
Website	https://www.sahrc.org.za/

10. DISCLOSURE IN TERMS OF SECTION 52 OF THE ACT

10.1. At this stage, no notice has been published on the categories of records that are automatically available without a person having to request access in terms of Section 52(2) of the Act.

10.2. Should such notice be published in future, the only fee payable, if any, for access to a record in terms of Section 52(2) of the Act is a fee for the reproduction.

11. SUBJECTS AND CATEGORIES OF RECORDS AVAILABLE ONLY ON REQUEST TO ACCESS IN TERMS OF THE ACT (SECTION 51(1)(e))

11.1. Records held by the Company

11.1.1. For the purposes of this clause 11.1, “Personnel” refers to any person who works for or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assist in carrying out or conducting the business of the Company. This includes, without limitation, directors (executive and non-executive), all permanent, temporary, and part-time staff, as well as contract workers.

11.1.2. This clause serves as a reference to the categories of information the Company holds. The information is classified and grouped according to records relating to the following subjects and categories:

SUBJECT	CATEGORY
Companies Act Records	documents of incorporation; index of names of directors; memorandum of incorporation; minutes of meetings of the board of directors; minutes of meetings of shareholders; proxy forms; register of debenture-holders; register of directors’ shareholdings;

	<p>share certificates;</p> <p>share register and other statutory registers and/or records and/or documents;</p> <p>resolutions passed at general and class meetings; and</p> <p>records relating to the appointment of:</p> <p>auditors;</p> <p>directors;</p> <p>prescribed Officer(s);</p> <p>public Officer; and</p> <p>company Secretary.</p>
Financial Records	<p>accounting records;</p> <p>annual financial reports;</p> <p>annual financial statements</p> <p>asset registers;</p> <p>bank statements;</p> <p>banking details and bank accounts;</p> <p>banking Records;</p> <p>debtors and creditors statements and invoices;</p> <p>general ledgers and subsidiary ledgers;</p> <p>general reconciliation;</p> <p>invoices;</p> <p>paid cheques;</p> <p>policies and procedures;</p> <p>rental Agreements; and</p> <p>tax Returns.</p>

Income Tax Records	<p>PAYE records;</p> <p>documents issued to employees for income tax purposes;</p> <p>records of payments made to SARS on behalf of employees;</p> <p>all other statutory compliances:</p> <p style="padding-left: 40px;">VAT;</p> <p style="padding-left: 40px;">regional services levies;</p> <p style="padding-left: 40px;">skills development levies;</p> <p style="padding-left: 40px;">UIF; and</p> <p style="padding-left: 40px;">workmen's compensation.</p>
<p>Personnel Documents And Records</p>	<p>address lists;</p> <p>disciplinary code and records;</p> <p>employee benefits arrangements rules and records;</p> <p>employment contracts;</p> <p>employment equity plan forms and applications;</p> <p>grievance procedures;</p> <p>leave records;</p> <p>medical aid records;</p> <p>payroll reports/ wage register;</p> <p>pension fund records;</p> <p>safety, health and environmental records;</p> <p>salary records;</p> <p>SETA records;</p> <p>standard letters and notices;</p> <p>training manuals;</p>

	training records; and
Procurement Department	standard terms and conditions for supply of services and products; contractor, client, and supplier agreements; lists of suppliers, products, services, and distribution; and policies and Procedures.
IT Department	computer or mobile device usage policy documentation; disaster recovery plans; hardware asset registers; information/security policies/standards/procedures; information technology systems and user manuals; information usage policy documentation; project implementation plans; software licensing; and system documentation and manuals.

11.2. Note that the accessibility of the records may be subject to the grounds of refusal set out in clause 18. Documents which are deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before the Company will consider access.

12. RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF THE ACT

- 12.1. Records of a public nature, typically those disclosed on the Company's website and in its various annual reports, may be accessed without the need to submit a formal application.
- 12.2. Other non-confidential records, such as statutory records maintained at the Companies and Intellectual Properties Commission, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

13. INFORMATION OR DOCUMENTS HELD IN TERMS OF OTHER SOUTH AFRICAN LEGISLATION

- 13.1. Where applicable to its operations, the Company also retains records and documents in terms of the following legislation:
 - 13.1.1. Basic Conditions of Employment Act, 1997
 - 13.1.2. Companies Act, 2008
 - 13.1.3. Competition Act, 1998
 - 13.1.4. Compensation for Occupational Injuries and Diseases Act, 1993
 - 13.1.5. Constitution of South Africa Act, 1996
 - 13.1.6. Copyright Act, 1987
 - 13.1.7. Criminal Procedure Act, 1977
 - 13.1.8. Debt Collectors Act, 1998
 - 13.1.9. Electronic Communications and Transactions Act, 2002
 - 13.1.10. Employment Equity Act, 1998
 - 13.1.11. Labour Relations Act, 1995
 - 13.1.12. Income Tax Act, 1962
 - 13.1.13. Insolvency Act, 1936
 - 13.1.14. Occupational Health and Safety Act, 1993
 - 13.1.15. Prevention of Organised Crime Act, 1998

13.1.16. Unemployment Contributions Act, 2002

13.1.17. Unemployment Insurance Act, 2001

13.1.18. Skills Development Act, 1998

13.1.19. Skills Development Levies Act, 1999

13.1.20. Value-Added Tax Act, 1991

13.2. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of this legislation shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act.

13.3. A request to access must be done in accordance with the prescriptions of the Act. The accessibility of such records may be withheld and refused in terms of clause 18 of this document.

14. PROCESS OF REQUESTING INFORMATION NOT AUTOMATICALLY AVAILABLE

14.1. A request shall be made on the prescribed form ([Request for Access to Record](#)) as attached hereto and marked Form 2. The prescribed form is also available from the website of the Information Regulator, South Africa at:

<https://infoeregulator.org.za/paia-forms/>

14.2. The prescribed form, and any applicable access fees, shall be submitted to the Request Liaison Officer at his/her address, telefax number or e-mail address, who shall hand it to the Information Officer, or his/her Deputy, of the Company.

14.3. The prescribed form shall contain sufficient information so that the Information Officer, or his/her Deputy, can properly identify:

14.3.1. the record(s) requested; and

14.3.2. the requester of the information.

14.4. The same procedure as set out in 13.1 and 13.2 applies if the requester is requesting information on behalf of another person or on behalf of a permanent employee of the Company.

14.5. The requester should indicate which form of access is required and submit a postal or email address so that the outcome of the request can be provided.

14.6. The requester must state that the reason for the request to information relates to the exercise or protection of a specific right and clearly state the nature of the right and why the information is necessary to exercise or protect such right as per Section 52(3)(d).

- 14.7. If the request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request and the Information Officer, or his/her Deputy, shall decide whether such proof is sufficient to continue with the request, as per Section 53(2)(f),
- 14.8. If an individual is unable to complete any of the prescribed forms due to illiteracy or disability, such a request may be made orally.
- 14.9. The requester must pay the prescribed access fee prior to any information being disclosed.
- 14.10. The Information Officer, or his/her Deputy, shall, unless the requester has stated special reasons, which have been accepted by the Information Officer, or his/her Deputy, as to why such time periods should not be complied with, as soon as reasonably possible and within 30 (thirty) days after the request has been received, decide whether or not to grant the request.
- 14.11. The requester will be notified of the decision of the Information Officer, or his/her Deputy, or the Request Liaison Officer in the manner indicated by the requester and on the prescribed form ([Outcome of request and of fees payable](#)) as attached hereto and marked Form 3.
- 14.12. If the request is granted, the requester shall be informed by the Information Officer, his/her Deputy, or the Request Liaison Officer, in the manner indicated by the requester in the prescribed form.
- 14.13. Notwithstanding the foregoing, the Company will advise the requester in the manner stipulated by the requester in the prescribed form of:
- 14.13.1. the access fee to be paid for the information;

14.13.2. the format in which access will be given; and

14.13.3. 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.

14.14. After access is granted, actual access to the record requested will be given as soon as reasonably possible.

14.15. If the request for access is refused, the Information Officer, or his/her Deputy, or the Request Liaison Officer, shall advise the requester in writing of the refusal. The notice of refusal will state:

14.15.1. adequate reasons for the refusal; and

14.15.2. that the requester may lodge an appeal with a court of competent jurisdiction against the refusal of the request.

14.16. Upon the refusal by the Information Officer, or his/her Deputy, or the Request Liaison Officer, the deposit paid by the requester will be refunded.

14.17. If the Information Officer, or his/her Deputy, or the Request Liaison Officer, fails to respond within 30 (thirty) days after a request has been received, it is deemed, in terms of section 58, read together with section 56(1) of the Act, that the request has been refused.

14.18. The Information Officer, or his/her Deputy, may decide to extend the period of 30 (thirty) days for another period of not more than 30 (thirty) days if:

14.18.1. the request is for a large number of records;

14.18.2. the search for the records is to be conducted at a premises not situated in the same town or city as the head office of the company;

14.18.3. consultation among divisions or departments, as the case may be, of the company is required;

14.18.4. the requester consents to such an extension in writing; and

14.18.5. the parties agree in any other manner to such an extension.

14.19. 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.

14.20. The requester may lodge an appeal with a court of competent jurisdiction against any extension or against any procedure set out in this section.

15. ACCESS FEES

15.1. The fees payable for the production of records are as follows and are attached hereto as Form 3 ([Outcome of request and of fees payable](#)):

15.1.1. the request fee payable by every requester, R140.00 (one hundred and forty Rands);

15.1.2. for every photocopy/printed black and white copy of A4-size page, R2.00 (two Rands) per page or part thereof;

15.1.3. for a copy in a computer-readable form on a:

15.1.3.1. flash drive (to be provided by the requester), R40.00 (forty Rands)

15.1.3.2. compact disc:

15.1.3.2.1. if provided by the requester, R40.00 (forty Rands)

15.1.3.2.2. if provided to the requester, R60.00 (sixty Rands)

15.1.4. for the transcription of visual images per A4-size page, service to be outsourced (which will depend on the quotation from a service);

15.1.5. for the transcription of an audio record, per A-4 size page, R24.00 (twenty-four Rands);

15.1.6. for a copy of an audio record on a:

15.1.6.1. flash drive (to be provided by the requestor), R40.00 (forty Rands); and

15.1.6.2. compact disc:

15.1.6.2.1. if provided by the requester, R40.00 (forty Rands); and

15.1.6.2.2. if provided to the requester, R60.00 (sixty Rands).

15.2. Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee is payable up-front before the institution will further process the request received.

- 15.3. Where the institution receives a request for access to information held on a person other than the requester himself/herself and the Information Officer, upon receipt of the request, is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requester. The amount of the deposit is equal to 1/3 (one-third) of the amount of the applicable access fee.
- 15.4. The initial "request fee" of R140,00 (one hundred and forty Rands) should be deposited into a bank account nominated by the institution and a copy of the deposit slip, application form and other correspondence or documents, forwarded to the Information Officer's email address detailed in clause 8.

16. INFORMATION OR RECORDS NOT FOUND

- 16.1. If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the Information Officer, or his/her Deputy, or the Request Liaison Officer, shall notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.
- 16.2. The affidavit or affirmation shall provide a full account of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the head of the company or the request liaison officer with every person who conducted the search.
- 16.3. The notice, as set out in 16.1, shall be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act.
- 16.4. If the record in question should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form unless

access is refused by the Information Officer, or his/her Deputy, or the Request Liaison Officer.

- 16.5. The attention of the requester is drawn to the provisions of Chapter 4 of Part 3 of the Act in terms of which the company may refuse, on certain specified grounds, to provide information to a requester.

17. INFORMATION REQUESTED ABOUT A THIRD PARTY

- 17.1. Section 71 of the Act makes provision for a request for information or records about a third party.
- 17.2. In considering such a request, the company will adhere to the provisions of sections 71 to 74 of the Act.
- 17.3. The attention of the requester is drawn to the provisions of Chapter 5 of Part 3 of the Act 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.
- 17.4. In addition, the provisions of Chapter 2 of Part 4 of the Act entitle third parties to dispute the decisions of the head of the company or the Request Liaison Officer by referring the matter to the High Court of South Africa.

18. GROUNDS FOR REFUSAL

- 18.1. The Information Officer, or his/her Deputy, or the Request Liaison Officer, may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the company may refuse access include:

- 18.1.1. protecting personal information that the Company holds about a third

person (who is a natural person) including a deceased person, from unreasonable disclosure;

- 18.1.2. protecting commercial information that the company holds about a third party or the company (for example trade secrets, financial, commercial, scientific, or technical information that may harm the commercial or financial interests of the organization or the third party);
- 18.1.3. if disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- 18.1.4. if disclosure of the record would endanger the life or physical safety of an individual;
- 18.1.5. if disclosure of the record would prejudice or impair the security of property or means of transport;
- 18.1.6. if disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- 18.1.7. if disclosure of the record would prejudice or impair the protection of the safety of the public;
- 18.1.8. the record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- 18.1.9. disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the company;
- 18.1.10. disclosure of the record would put the company at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;

18.1.11. the record is a computer programme; and

18.1.12. the record contains information about research being carried out or about to be carried out on behalf of a third party or the company.

18.2. Any request for information which is clearly frivolous or vexatious or which involves an unreasonable amount of resources be spent in obtaining such records, shall be refused.

18.3. All requests for information shall be decided on their own merits and in terms of the Act and other applicable legislation.

19. REMEDIES

19.1. The Company does not have internal appeal procedures regarding the refusal of any requests. As such, the decision made by Information Officer, or his/her Deputy, or the Request Liaison Officer, is final.

19.2. If a request is denied, the requestor is entitled, within 30 (thirty) days after receiving the decision of refusal, to apply to a court with appropriate jurisdiction, for relief.

19.3. Should a third party be aggrieved by a decision to grant a request for information under the Act, such person may, within 30 (thirty) days after receiving the decision to grant the request, to apply to a court with appropriate jurisdiction, for relief.

19.4. A requester is entitled to lodge a complaint with the Information Regulator, should he/she wish to do so.

20. PROCESSING OF PERSONAL INFORMATION IN TERMS OF THE POPIA

20.1. Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

20.2. The Company requires Personal Information relating to both individual and juristic persons in order to carry out its business and organizational functions. The manner in which this information is processed and the purpose for which it is processed is determined by the Company. The Company is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

20.2.1. is processed lawfully, fairly, and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Company, in the form of privacy or data collection notices. The Company must also have a legal basis (for example, consent) to process Personal Information;

20.2.2. is processed only for the purposes for which it was collected;

20.2.3. will not be processed for a secondary purpose unless that Processing is compatible with the original purpose;

20.2.4. is adequate, relevant, and not excessive for the purposes for which it was collected;

20.2.5. is accurate and kept up to date;

20.2.6. will not be kept for longer than necessary;

20.2.7. is processed in accordance with integrity and confidentiality principles; this includes physical and organizational measures to ensure that Personal Information, in both physical and electronic form, are subject to an

appropriate level of security when stored, used and communicated by the Company, in order to protect against access and acquisition by unauthorized persons and accidental loss, destruction or damage;

20.2.8. is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to;

20.2.8.1. be notified that their Personal Information is being collected by the Company. The Data Subject also has the right to be notified in the event of a data breach;

20.2.8.2. know whether the Company holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;

20.2.8.3. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained personal information;

20.2.8.4. object to the Company's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Company's record keeping requirements);

20.2.8.5. object to the Processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and

20.2.8.6. lodge a complaint with the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA

and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

21. CATEGORIES OF DATA SUBJECTS AND THEIR PERSONAL INFORMATION

The company may possess records relating to suppliers, members, partners, contractors, service providers, staff, and clients (i.e. beneficiaries) which may be in connection with the following:

ENTITY TYPE	PERSONAL INFORMATION PROCESSED
21.1. Clients: Natural Persons	names; physical and postal addresses; date of birth; ID number; tax related information; nationality; gender; confidential correspondence; and any identifying number, symbol, email address, telephone number, location information, online identifier, or other particular assignment to the person.
21.2. Clients – Juristic Persons	names of contact persons; name of legal entity; registration number; physical and postal address;

	<ul style="list-style-type: none">contact details;financial information;founding documents;tax related information;authorized signatories,beneficiaries; andultimate beneficial owners.
21.3. Clients – Foreign Persons or Entities	<ul style="list-style-type: none">names;contact details;physical and postal addresses;date of birth;ID number;tax related information;nationality;gender;confidential correspondence; andidentifying number, symbol, email address, telephone number, location information, online identifier, or other particular assignment to the person.
21.4. Contracted Service Providers	<ul style="list-style-type: none">names of contact persons;name of legal entity;registration number;physical and postal address;contact details;financial information;founding documents;tax related information;

	<p>behavior;</p> <p>signatories;</p> <p>beneficiaries; and</p> <p>ultimate beneficial owners.</p>
21.5. Employees or Directors	<p>biometric information;</p> <p>information relating to the education or the medical, financial, criminal or employment history of the data subject; information relating to the race, gender, marital status, national origin, age disability, language, and birth of the Data Subject;</p> <p>well-being;</p> <p>the personal opinions, views, or preferences of the Data Subject; confidential correspondence sent by the Data Subject; and</p> <p>the views or opinions of another individual about the Data Subject.</p>

22. THE COMPANY MAY SUPPLY PERSONAL INFORMATION TO THE FOLLOWING RECIPIENTS

- 22.1. Regulatory, statutory and government bodies;
- 22.2. Employees of the company;
- 22.3. Suppliers, service providers, vendors, agents, and representatives of the company;
- 22.4. The company's members and other stakeholders;
- 22.5. Third party verification agencies and credit bureau;
- 22.6. Collection agencies; and

22.7. Banks and other financial institutions.

23. CROSS-BORDER FLOWS OF PERSONAL INFORMATION

23.1. Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

23.1.1. 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; or

23.1.2. the Data Subject consents to the transfer of their Personal Information; or

23.1.3. the transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or

23.1.4. the transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or

23.1.5. 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.

24. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES

24.1. The company employs up to date technology to ensure the confidentiality, integrity, and availability of the Personal Information under its care. The measures include:

24.1.1. firewalls;

24.1.2. virus protection software and update protocols;

24.1.3. logical and physical access control;

24.1.4. secure setup of hardware and software making up the IT infrastructure; and

24.1.5. outsourced service providers who process Personal Information on behalf of the company are contracted to implement security controls.

25. SECURITY MEASURES IMPLEMENTED OR TO BE IMPLEMENTED BY THE COMPANY TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY FOR THE PERSONAL INFORMATION WHICH MAY BE OR IS BEING PROCESSED BY THE COMPANY:

25.1. The company continuously establishes and maintains appropriate, reasonable technical and organizational measures to ensure that the integrity of the Personal Information which may be in its possession or under its control is secure.

25.2. The company further ensures that such information is protected against unauthorized or unlawful Processing, accidental loss, destruction or damage, alteration, or access by having regard to the requirements set forth in law, in industry practice and generally accepted information security practices and procedures with apply to the company.

THIS DOCUMENT IS APPROVED AND SIGNED BY THE MANAGING DIRECTOR OF THE COMPANY

ON THIS 21 DAY OF July 2025.

Sarah Gooding

SARAH GOODING

MANAGING DIRECTOR

WAGGENER EDSTROM WORLDWIDE (PTY) LTD