

**THIS MANUAL**

**IS PREPARED IN ACCORDANCE WITH**

**SECTION 51 OF THE PROMOTION OF ACCESS TO**

**INFORMATION ACT, 2000**

**AND**

**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 a contrary intention –

### 1.1 an expression which denotes -

#### 1.1.1 any gender includes the other genders;

#### 1.1.2 a natural person includes an artificial or juristic person and vice versa;

#### 1.1.3 the singular includes the plural and vice versa;

### 1.2 the following expressions shall bear the meanings assigned to them below and cognate expressions bear corresponding meanings -

#### 1.2.1 "**Company**" – Automotive Industry Transformation Fund NPC;

#### 1.2.2 "**document**" or "**Manual**" - this document together with all of its annexures, as amended from time to time;

#### 1.2.3 "**Data Subject**" - the natural or juristic person to whom the Personal Information relates;

#### 1.2.4 "**Information Officer**" - the person duly authorised 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 section 56 of PAIA.

#### 1.2.5 "**PAIA**" - Promotion of Access to Information Act No. 2 of 2000, as amended from time to time including the regulations promulgated in terms of PAIA;

#### 1.2.6 "**POPIA**" - the Protection of Personal Information Act, No. 4 of 2013;

#### 1.2.7 "**Personal Information**" - the means information (including Special Personal Information) relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person in particular by reference to an identification number or to one or more factors specific to physical, physiological, mental, economic, cultural or social identity, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, recruitment details, financial history and the like. It also includes opinions about individuals as well as facts and also applies to corporate contacts;

#### 1.2.8 "**Processing**" or "**Processed**"- is any activity that involves use of Personal Information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:

##### 1.2.8.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

##### 1.2.8.2 dissemination by means of transmission, distribution or making available in any other form; or

##### 1.2.8.3 merging, linking, as well as restriction, degradation, erasure or destruction of Personal Information;

#### 1.2.9 "**Record**" means any recorded information:

##### 1.2.9.1 regardless of form or medium, including any of the following:

##### 1.2.9.1.1 writing on any material;

- 1.2.9.1.2 information produced, recorded or stored by means of any taperecorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- 1.2.9.1.3 book, map, plan, graph or drawing; photograph, film, negative, tape or other Device in which one or more visual Images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
- 1.2.9.2 in the possession or under the control of a Responsible Party;
- 1.2.9.3 whether or not it was created by a Responsible Party; and
- 1.2.9.4 regardless of when it came into existence; or stored;
- 1.2.10 "**Responsible Party/Parties**" are the people who or organisations which determine the purposes for which, and the manner in which, any Personal Information is Processed. They have a responsibility to establish practices and policies in line with POPIA. The company is the Responsible Party of all Personal Information used in its business;
- 1.2.11 "**Requester**" means any person or entity (including any Data Subject) requesting access to a record that is under the control of the company;
- 1.2.12 "**Special Personal Information**" includes personal information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life or biometric information of a data subject; or the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence; or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings;
- 1.3 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;
- 1.4 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;
- 1.5 where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this document;
- 1.6 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;

- 1.7 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;
- 1.8 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;
- 1.9 insofar as there is a conflict in the interpretation of or application of this document and PAIA, then in that event PAIA shall prevail;
- 1.10 this document does not purport to be exhaustive of or comprehensively deal with every procedure provided for in PAIA. A Requester is advised to familiarise his/her/itself with the provisions of PAIA before lodging any request with the company.

## **2. Aim of the Manual**

- 2.1 The Act came into operation on 9 March 2001 and seeks, among other things, to give effect to the constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to Records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the Requester is able to show that the Record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable. The Act sets out the requisite procedural issues attached to information requests.
- 2.2 Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual has to comply with.
- 2.3 The aim of this Manual is to facilitate the requests for access to records of the company as provided for in PAIA. As such, this Manual constitutes the company's Manual. This Manual is compiled in accordance with section 51 of PAIA as amended by POPIA, which gives effect to everyone's constitutional right to privacy. POPIA promotes the protection of Personal Information Processed by public and private bodies, including certain conditions so as to establish minimum requirements for the Processing of Personal Information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of Personal Information.
- 2.4 This Manual also includes information on the submission of objections to the Processing of Personal Information and requests to delete or destroy Personal Information or records thereof in terms of POPIA.

### 3. **Scope of the Manual**

This Manual has been prepared in respect of, and applies to, the company and where applicable, its affiliates. Any reference to the company under this Manual shall specifically include, where applicable, its affiliates which include AutoFund (RF) (Pty) Ltd.

### 4. **Company Details**

As per section 51 of PAIA, the company contact details are as follows:

Full name: Automotive Industry Transformation Fund NPC (and includes its affiliates)  
Registration No.: 2020/037969/08  
Postal address: 2<sup>nd</sup> Floor, 21 Treur Close, Waterfall Office Park, Midrand, 1685  
Physical address: 2<sup>nd</sup> Floor, 21 Treur Close, Waterfall Office Park, Midrand, 1685  
Telephone Number: 010 054 6207  
Website address: [www.autofund.co.za](http://www.autofund.co.za)  
Email: [info@autofund.co.za](mailto:info@autofund.co.za)

### 5. **Contact details of the Head of the Company, Information Officer and Information Regulator**

#### 5.1 The head of the company is Mr Jabulani Selumane.

His contact details are as follow:

Telephone Number: 010 054 6207  
Email address: [info@autofund.co.za](mailto:info@autofund.co.za)

#### 5.2 The Information Officer is Mr Thabo Mokoena.

His contact details are as follow:

Telephone Number: 010 054 6207  
Email address: [compliance@autofund.co.za](mailto:compliance@autofund.co.za)

5.3 The Information Officer details are as follows:

Attention: The Information Officer  
Telephone Number: 010 054 6207  
Email address: [compliance@autofund.co.za](mailto:compliance@autofund.co.za)

6. **The Information Regulator's Guide**

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

6.2 The contact details of the Information Regulator are as follows:

Physical Address: JD House 27 Stiemens Street Braamfontein, Johannesburg  
Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017  
Telephone Number: +27 (0) 10 023 5207  
Fax Number: 086 500 3351  
Email address: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za) / [enquiries@infoeregulator.org.za](mailto:enquiries@infoeregulator.org.za)  
Website: <https://www.justice.gov.za/infoereg/> or <https://infoeregulator.org.za/>

7. **Information / documents held in terms of other South African legislation**

The following are some of the South African legislation in terms of which records may be held by the company. This is not an exhaustive list and it must be pointed out that these records are not necessarily available to requestors in terms of PAIA.

- Basic Conditions of Employment Act, 1997.
- Companies Act, 2008.
- Competition Act, 1998
- Compensation for Occupational Injuries and Diseases Act, 1993.
- Constitution of South Africa Act, 1996

- Copyright Act, 1987
- Criminal Procedure Act, 1977
- Debt Collectors Act, 1998
- Electronic Communications and Transactions Act, 2002
- Employment Equity Act, 1998.
- Labour Relations Act, 1995.
- Income Tax Act, 1962.
- Insolvency Act, 1936
- Occupational Health and Safety Act, 1993.
- Prevention of Organised Crime Act, 1998
- Unemployment Contributions Act, 2002.
- Unemployment Insurance Act, 2001.
- Skills Development Act, 1998.
- Skills Development Levies Act, 1999.
- Value-Added Tax Act, 1991.

## 8. **Records held by the company**

The following is a list of the documents held by the company. Access to these documents may be protected by professional privilege or privacy laws or the grounds of refusal detailed in PAIA.

### ***Category Subject/Description:***

- 8.1 Records relating to beneficiaries - These include correspondence, submitted applications, conduct of due diligence processes on company's clients, contracts, Personal Information Processed in order to comply with obligations imposed on the company under the Based Black Economic Empowerment Act No. 53 of 2003 ("**BEE Act**") read together with the Codes of Good Practice on Broad-Based Black Economic Empowerment published in terms of Government Gazette No. 36928 on 11 October 2013 under section 9(1) of the BEE Act, as amended or reissued from time to time.
- 8.2 Records relating to the incorporation of the company - Memorandum of Incorporation and Members Agreement.

- 8.3 Records relating to employees and ex-employees - These include policies and procedures, details of employment, employee files and remuneration data.
- 8.4 Financial and administrative records and policies relating to the company's activities.
- 8.5 Accounting - Accounts, invoices, reconciliations, investment records credit/debit notes, journals, ledgers, balance sheets, income statements, trial balances, payment schedules, cheque runs, cash flow statements, audit reports, purchasing records, transactional records.
- 8.6 Financial Information - Financial Statements, Financial and Tax Records (Company & Employees), Asset Register & Insurance information, Banking details.
- 8.7 Information technology – Information technology agreements, including computer software, support and maintenance agreements.
- 8.8 Administration — Minutes of meetings of various committees within the company; General correspondence; Lease agreement; Copies and correspondence relating to various insurance policies; General correspondence; Workpapers; Operating manuals of mechanical and electrical systems; Salary workpapers; Copies of and correspondence with regard to office building lease; Correspondence with OEMs; Voicemail and security systems.
- 8.9 Human Resources — Contracts of employment; Documents relating to remuneration structuring; Job specifications; Format/procedures for advertising positions; Performance evaluations; Personnel files; Policies and Procedures; All employment applications; Forms relating to new staff appointments and leave records; confidentiality undertakings, Various payroll, Workman's Compensation documentation
- 8.10 Legal – agreements, complaints, pleadings, briefs and other documents pertaining to any actual or pending litigation, arbitration or investigation, material licenses, permits and authorizations.
- 8.11 Support services - List of suppliers.

**Note:** These records are not necessarily available to requestors in terms of PAIA. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

## 9. Automatically available information

- 9.1 Information that is obtainable via the company's website about the company is automatically available and need not be formally requested in terms of this Manual.
- 9.2 The following categories of Records are automatically available for inspection, purchase or photocopying:
  - 9.2.1 press releases, brochures, publications and various other marketing and promotional material.
- 9.3 In terms of POPIA, Personal Information must be Processed for a specified purpose. The purpose for which Personal Information is Processed by the company will depend on the nature of the



Personal Information and the particular Data Subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the Personal Information is collected. In general, Personal Information is Processed for purposes of, inter alia, on-boarding beneficiaries/clients and suppliers, service or product delivery, Record management, security, employment, giving effect to professional instructions received and related matters. The company may collect all types of Personal Information, including Special Personal Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

9.4 Please also refer to the company's Privacy Statement for further information.

#### **10. Information or records not found**

- 10.1 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 head of the company or the Information Officer shall notify the Requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested Record.
- 10.2 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 Information Officer with every person who conducted the search.
- 10.3 The notice, as set out in 10.1, shall be regarded as a decision to refuse a request for access to the Record concerned for the purposes of PAIA.
- 10.4 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 head of the company or the Information Officer.
- 10.5 The attention of the Requester is drawn to the provisions of Chapter 4 of Part 3 of PAIA in terms of which the company may refuse, on certain specified grounds, to provide information to a Requester.

#### **11. Information requested about a third party**

- 11.1 Section 71 of PAIA makes provision for a request for information or records about a third party.
- 11.2 In considering such a request, the company will adhere to the provisions of sections 71 to 74 of PAIA.
- 11.3 The attention of the Requester is drawn to 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 head of the company or the Information Officer by referring the matter to the High Court of South Africa.

#### **12. Process of requesting information not automatically available**

- 12.1 PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.
- 12.2 Information will therefore not be furnished unless a person provides sufficient particulars to enable the company to identify the right that the Requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. The request procedure contained in this Manual may not be used for access to a Record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.
- 12.3 The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA. All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details above and completing the relevant form as stated below. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to the Requester.
- 12.4 **Aspects relating to a request procedure:**
- 12.4.1 If the Requester is entitled to make a request for access to certain information under PAIA, the request procedure outlined below must be utilised.
- 12.4.2 POPIA provides that a Data Subject may, upon proof of identity, request the company to confirm, free of charge, all the information it holds about the Data Subject and may request access to such information, including information about the identity of Third Parties who have or have had access to such information.
- 12.4.3 POPIA provides that a Data Subject may object, at any time, to the Processing of Personal Information by the company, on reasonable grounds relating to his/her particular situation, unless legislation provides for such Processing. A Data Subject may also request the company to correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a Record of Personal Information about the Data Subject that the company is no longer authorised to retain in terms of POPIA's retention and restriction of Records provisions.
- 12.5 **Completion of the prescribed form:**
- 12.5.1 Any request for access to a Record in terms of PAIA must substantially correspond with Form 2 and/or Form 3 (where applicable). Both forms are accessible on our website. This must be sent to the Information Officer at the address or electronic mail address of the body concerned.
- 12.5.2 The Requester must provide sufficient detail on the request 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 in the Republic 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.

- 12.5.3 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. If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of the private body.
- 12.5.4 Any request for access to a Record in terms of POPIA must substantially correspond to the Data Subject's access request form.

### 13. Fees Payable

- 13.1 The fees for reproduction of a Record as referred to in section 52(3) of PAIA are as follows (ie there are two categories of fees which are payable):
- 13.1.1 The request fee payable by a Requester, other than a personal Requester, is R50.00.
- 13.1.2 The access fees which apply are set out below. The company can refuse access until such access fees have been paid.

No.	Reproduction (Request Item)	Fee (Rand)
1.	Photocopy (Cost per A4-size page or part thereof/item)	R1.10 per page
2.	Printed copy (Cost per A4-size page or part thereof/item)	R0.75 per page
3.	For a copy in a computer-readable form on: <ul style="list-style-type: none"> <li>i (i) Flash drive</li> <li>ii • To be provided by requestor</li> <li>iii (ii) Compact disc</li> <li>iv • If provided by requestor</li> <li>v • If provided to the requestor</li> </ul>	R40.00  R40.00 R60.00
4.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider
<b>5.</b>	<b>Copy of visual images</b>	
5.1	Transcription of an audio record, per A4-size	R24.00
5.2	<b>Copy of an audio record</b> <ul style="list-style-type: none"> <li>(i) Flash drive</li> <li>• To be provided by requestor</li> <li>(ii) Compact disc</li> <li>• If provided by requestor</li> <li>• If provided to the requestor</li> </ul>	R40.00  R40.00 R60.00
5.3	Postage, e-mail or any other electronic transfer:	Actual costs

#### 14. **Decision on request**

- 14.1 After the Information Officer has made a decision on the request, the Requester will be notified using the required form.
- 14.2 If the request is granted then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the Record for disclosure.

#### 15. **Timelines for consideration of a request**

- 15.1 Requests for access by a Requestor will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30 day time limit is necessary. Such considerations include –
  - 15.1.1 where the request is for a large number of records or requires a search through a large number of records (including where records that have been archived electronically need to be restored);
  - 15.1.2 where the request requires a search for records in, or collection of such records from, an office of the company located far away from Johannesburg;
  - 15.1.3 consultation among divisions of the company or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original 30-day period;
  - 15.1.4 more than one of the circumstances contemplated in paragraphs 15.1.1, 15.1.2 and 15.1.3, exist in respect of the request making compliance with the original period not reasonably possible; or the Requester consents in writing to such extension.
  - 15.1.5 If an extension is necessary, the Requester will be notified with reasons for the extension. If the Information Officer fails to communicate a decision on a request, such a request is then deemed to have been refused.

#### 16. **Grounds for Refusal**

The head of company or risk 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 but is not limited to:

- 16.1 The disclosure would involve the unreasonable disclosure of Personal Information about a third party (natural person), including a deceased individual;
- 16.2 Protecting commercial information that the company holds about a third party or the company (for example trade secret: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organisation or the third party);

- 16.3 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;
- 16.4 If disclosure of the Record would endanger the life or physical safety of an individual;
- 16.5 If disclosure of the Record would prejudice or impair the security of property or means of transport;
- 16.6 If disclosure of the Record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- 16.7 If disclosure of the Record would prejudice or impair the protection of the safety of the public;
- 16.8 The Record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- 16.9 Disclosure of the Record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the company;
- 16.10 Disclosure of the Record would put the company at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- 16.11 The Record is a computer programme; and
- 16.12 The Record contains information about research being carried out or about to be carried out on behalf of a third party or the company.

## 17. Remedies

The company does not have internal appeal procedures regarding the refusal of any requests. As such, the decision made by head of the company or the Information Officer, is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, for relief.

## 18. Purpose of Processing Personal Information in terms of the POPIA

### 18.1 The company uses the Personal Information under its care in the following ways:

- 18.1.1 Fulfilling its statutory obligations in terms of applicable legislation;
- 18.1.2 Verifying information provided to the company by clients and service providers;
- 18.1.3 Staff administration
- 18.1.4 Keeping of accounts and records
- 18.1.5 Obtaining information necessary to provide contractually agreed services to a customer;

- 18.1.6 Monitoring, maintaining and managing the company's contractual obligations to customers, clients, suppliers, service providers, employees, directors and other third parties;
- 18.1.7 Marketing and advertising;
- 18.1.8 Resolving and tracking complaints;
- 18.1.9 Monitoring and securing the assets, employees and visitors to the premises of the company;
- 18.1.10 Historical Record keeping, research and recording statistics necessary for fulfilling the company's business objectives.

## 18.2 Categories of Data Subjects and their Personal Information:

The company may possess records relating to suppliers, members, partners, contractors, service providers, staff and clients (ie beneficiaries):

Entity Type	Personal Information Processed
Clients: natural persons	Names; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; confidential correspondence; identifying number, symbol, email address, telephone number, location information, online identifier or other particular assignment to the person.
Clients – juristic persons / entities	Names of contact persons; Name of Legal Entity; Registration Number; Physical and Postal address and contact details; Financial information; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners; BBBEE information.
Clients – foreign persons / entities	Names; contact details; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; confidential correspondence; identifying number, symbol, email address, telephone number, location information, online identifier or other particular assignment to the person.
Contracted service providers	Names of contact persons; Name of Legal Entity; Registration Number; Physical and Postal address and contact details; Financial information; Founding documents; Tax related information; behaviour; signatories, beneficiaries, ultimate beneficial owners; BBBEE information.
Employees / Directors	Biometric information; 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; well-being; The personal opinions, views or preferences of the Data Subject; Confidential correspondence sent by the Data Subject; The views or opinions of another individual about the



	Data Subject.
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**18.3 The company may process the Personal Information of the following categories of Data Subjects, which includes current, past and prospective Data Subjects:**

- 18.3.1 clients and employees, representatives, agents, contractors and service providers of such clients;
- 18.3.2 Suppliers, service providers to and vendors of the company and employees, representatives, agents, contractors and service providers of such suppliers and service providers;
- 18.3.3 Directors and officers of the company;
- 18.3.4 Members of the company;
- 18.3.5 Job applicants;
- 18.3.6 Existing and former employees (including contractors, agents, temporary and casual employees);
- 18.3.7 Visitors to any premises of the company; and
- 18.3.8 Complaints, correspondents and enquiries.

**18.4 The company may supply Personal Information to the following recipients:**

- 18.4.1 Regulatory, statutory and government bodies;
- 18.4.2 Employees of the company;
- 18.4.3 Suppliers, service providers, vendors, agents and representatives of the company;
- 18.4.4 The company's members and other stakeholders;
- 18.4.5 Third party verification agencies and credit bureau;
- 18.4.6 Collection agencies;
- 18.4.7 Banks and other financial institutions.

**18.5 Planned or prospective transborder flow of Personal Information Processed by the company in respect of the above categories of Data Subjects**

- 18.5.1 Personal Information may be transmitted transborder to the company's members, suppliers and/or funders in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. The company will endeavour to ensure that its suppliers, funders and members will make all reasonable efforts to secure said data and Personal Information.

- 18.5.2 Current employees and consultants' information may also be transferred transborder where the company may be providing services or performing in terms of its contractual obligations.

**18.6 General Description of Information Security Measures:**

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

- 18.6.1 Firewalls
- 18.6.2 Virus protection software and update protocols
- 18.6.3 Logical and physical access control;
- 18.6.4 Secure setup of hardware and software making up the IT infrastructure;
- 18.6.5 Outsourced Service Providers who process Personal Information on behalf of the company are contracted to implement security controls.

**18.7 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:**

The company continuously establishes and maintains appropriate, reasonable technical and organisational measures to ensure that the integrity of the Personal Information which may be in its possession or under its control is secure and that such information is protected against unauthorised 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.

**19. Availability of the Manual**

- 19.1 This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of the company.
- 19.2 Copies of the Manual may be made, subject to the prescribed fees.
- 19.3 The Manual is also posted on the company's website referred to above.