

ACCESS TO INFORMATION MANUAL

SEE ME SAVE (Pty) Ltd

(Reg no: 2015/090397/07)

1. INTRODUCTION

Section 51 of the Promotion of Access to Information Act No.2 of 2000 ("POPIA") requires Private Bodies to compile a Manual setting out the procedure and requirements to be adhered to in seeking to obtain access to information held by that Private Body. This section also stipulates the minimum requirements a Manual has to comply with.

See Me Save (Pty) Ltd is a company whose core business is in that of digital marketing.

The contact details of the Information Officer are as follows:

Information Officer Name	Natasha Maharaj
Physical Address	128 Leslie Road Fourways
Postal Address	128 Leslie Road Fourways
Website Address	www.seemesave.com
Telephone Number	011 513 3048
Email Address	legal@seemesave.com

2. PAI MANUAL

The purpose of this Manual is:-

- To establish the procedure that a Requestor for information is to follow and the manner in which a Request for Access shall be facilitated; and
- For purposes of POPIA:
- detail the purpose for which personal information may be processed;
- a description of the categories of Data Subjects for whom the Company processes personal information,
- as well as the categories of personal information relating to such Data Subjects; and the recipient to whom personal information may be supplied.

3. Availability of the manual

The Manual is available for inspection at the address as set out below.

The Manual is available for download on the Company website.

4. DEFINITIONS

“Data Subject”	Shall mean the person to whom personal information relates. Categories of data subjects The Company holds information and records on the following categories of data subjects: employees / personnel; any third party with whom the Company conducts its business services; contractors of the Company; suppliers of Company; and service providers of the Company.
“Manual”	shall mean this manual, together with all appendices hereto.
“PAIA”	Shall mean Promotion of Access to Information Act, No 2 of 2000.
“POPIA”	Shall mean Protection of Personal Information Act, No 4 of 2013.
“Processing”	Shall ascribe to the meaning as promulgated in section 1 of POPIA.
“Record”	Shall ascribe to the meaning as promulgated in section 1 of POPIA.
“Requestor”	Shall ascribe to the meaning as promulgated in section 1 of PAIA.
“Request for Access”	Shall ascribe to the meaning as promulgated in section 1 of PAIA.
“SAHRC”	Shall mean the South African Human Rights Commission.

5. SOUTH AFRICAN HUMAN RIGHTS COMMISSION

(Section 51(1)(b))

The South African Human Rights Commission (SAHRC) is responsible for compiling a Guide that will facilitate ease of use of PAIA for Requesters.

Please direct any queries to:

The South African Human Rights

Commission: PAIA Unit

Postal address:

Private Bag X
2700 Houghton
2041

Physical address:

Forum 3 Braampark Offices 33 Hoofd,
Street Braamfontein

Phone: +27(11)877-3600

Fax: +27(11)403-0625

Email: PAIA@sahrc.org.za

Website: www.sahrc.org.za

6. SCHEDULE OF RECORDS HELD IN ACCORDANCE WITH OTHER LEGISLATION

(Section 51(1)(e))

Company Financial and Accounting Records, Statutory company information, Tax, Records, Legal Records, Insurance Records, Employee Records, Share registration documents, Marketing, Product Records, Customer Records and credit services, Supplier Records, Information technology, Fixed property and fixed assets, Intellectual property

7. LIST OF APPLICABLE LEGISLATION - (Section 51(1)(d))

Certain legislation provides that private bodies shall allow certain persons access to specified records, upon request. The legislation may be consulted to establish whether the Requester has a right of access to a Record other than in terms of the procedure set out in PAIA.

If the Requester believes that a right of access to a Record exists in terms of legislation other than that listed above, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in the light thereof.

8. ACCESS REQUEST PROCEDURE - (section 51(1)(e))

POPIA provides that a data subject may, upon proof of identity, request the responsible party 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.

POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, the responsible party must provide the data subject with a written estimate of the payable amount before providing the service and may require that the Requestor pay a deposit for all or part of the fee.

It is important to note that the successful completion and submission of an access request form does not automatically allow the Requester access to the requested Record.

If it is reasonably suspected that the Requester has obtained access to Records through the submission of materially false or misleading information, legal proceedings may be instituted against such a Requester.

8.1 COMPLETION AND SUBMISSION OF ACCESS REQUEST FORM

Use the prescribed **Annexure 1** which is attached hereto. This is also available on the SAHRC website at www.sahrc.org.za.

The prescribed **Annexure 1** - Access Request Form must be completed in full and contain sufficient detail in order to enable the Information Officer to identify:

- The Records requested;

- Proof of identity of the Requester (and if an agent is lodging the request, proof of capacity) by attachment of the identity document of the Requester;
- All questions on Annexure 1 must be answered.
- If there is insufficient space on the form, additional information may be provided on an attached folio and each answer on such folio must reflect the applicable title.
- Which form of access is required;
- The contact details of the Requester in the Republic of South Africa.
- The Requester must identify the right which the Requester is seeking to exercise or protect.

The Requester must provide an explanation of the reason the Record is required for the exercise or protection of any right.

If, in addition to a written reply, the Requester wishes to be informed of the decision in respect of the request in any other manner, the Requester is making the request to the reasonable satisfaction of the Information Officer.

8.2 NOTIFICATION

- The Information Officers will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect. These requests will be evaluated by the applicable entities and persons involved, including but not limited to
 - the Divisional Executive Management, Company Management and/or functional management.
- The 30-day period within which the Information Officer must decide whether to grant or refuse the request may be extended for a further period of not more than 30 days if the request is for a large volume of information or requires the Information Offices to search through a large volume of Records, or the Records are not kept at the offices of the Company.
- The Information Offices will notify the Requester in writing should an extension be sought.
- If a Record requested cannot be found, or does not exist, the Information Officer shall by means of an affidavit notify the Requester. In the affidavit, a full account is required of all steps taken to find that Record in question.
- If the Request for Access to a Record is not successful, the Requester will be notified of the following:
 - Adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal below); and
 - That the Requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

8.3 PAYMENT OF FEES

- The completed Access Request, **Annexure 1**, must be submitted and must be addressed to the Information Officer as indicated in this Manual.
- An initial, non-refundable request fee of R50.00 (excl VAT) is payable on submission.

Note: In terms of POPIA :This fee is not applicable to Personal Requesters (Data Subjects),referring to any person seeking access to Records that contain their personal information intermsofPOPIA.

- Payment details can be obtained from the Information Officer as indicated in Section 4 of thisManual and payment can be made either via a direct deposit or by bank guaranteed cheque(nocredit cardpaymentsare accepted).Proofofpaymentmust besupplied.
- The Requester may be notified whether a deposit is required. A deposit will be requireddependingoncertainfactorssuchasthevolumeand/orformatofthe informationrequested.

Note: If the Request for Access is successful, an access fee will be required for the search,reproduction and/or preparation of the Record(s) and will be calculated based on thePrescribed Fees – see **Annexure2**. The access fee must be paid prior to access being given totherequested Record.

8.4 THIRD PARTY INFORMATION

- If access is requested to a Record that contains information about a third party, therelevantInformation Officer is obliged to attempt to contact this third party to inform them of therequest.This enablesthe thirdpartytheopportunityofrespondingbyeitherconsentingto theaccessorbyprovidingreasonswhytheaccessshouldbedenied.
- Intheeventofthethird-partyfurnishingreasonsforthesupportordenialofaccess,theInformati onOfficerwillconsiderthesereasonsindetermining whetheraccessshouldbegranted.

8.5 GROUNDS FOR REFUSAL

The Information Officer may legitimately refuse to grant access to a requested Record thatfallswithinacertaincategory. Groundsonwhichthecompanymayrefuse access include:

- protecting personal information that the Information Officer holds about a third person(whoisanaturalperson),includingadeceasedperson,fromunreasonabledisclosure;
- protecting commercial information that is heldabout a third party or a particular company (for example trade secrets: financial, commercial,scientific or technical information that may harm the commercial or financial interests of theorganizationorthethirdparty);
- if disclosure of the Record would result in a breach of a duty of confidence owed to a thirdpartyin termsof anagreement;
- ifdisclosureofthe Recordwouldendangerthelifeorphysical safetyofanindividual;
- if disclosure of the Record would prejudice or impair the security of property or meansoftransport;

- if disclosure of the Records would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- if disclosure of the Record would prejudice or impair the protection of the safety of the public;
- the Record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- disclosure of the Record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the Company;
- disclosure of the Record would put the particular company at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- the Record is a computer programme; and
- the Record contains information about research being carried out or about to be carried out on behalf of a third party.

8.6 REMEDIES AVAILABLE UPON REFUSAL OF A REQUEST TO ACCESS

Internal remedies

The Company does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and Requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.

External remedies

In accordance with sections 56(3) (c) and 78 of PAIA, a Requestor may apply to a court for relief within 180 days of notification of the decision for appropriate relief.

8.7 RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

If the Information Officer has searched for a Record and it is believed that the Record either does not exist or cannot be found, the Requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the Record.

9. PROCESSING OF PERSONAL INFORMATION ACT

9.1 PURPOSE OF POPIA

The Protection of Personal Information Act, 4 of 2013 (POPIA), regulates and controls the Processing, including the collection, use, and transfer of personal information relating to identifiable, living, natural persons and juristic persons.

Personal information as defined in terms of POPIA includes but is not limited to, *Name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, tax number, financial information, biometric information, personal opinions or views of a person, criminal history, membership of a trade union, images by way of CCTV.*

In terms of POPIA, a person (Responsible Party) has a legal duty to collect, use, transfer and destroy (process) another's (Data Subject) personal information (Personal Information) in a lawful, legitimate and responsible manner and in accordance with the provisions and the 8 Processing conditions set out under POPIA.

9.2 DESCRIPTION OF CATEGORIES OF DATA SUBJECTS

The Company holds information and record information relating to the following broad categories of data subjects or persons, which list is not limited to:

- Employees/job applicants/learnership candidates/bursary applicants/directors/interns/agents/sponsors
- Customers and clients of the companies
- Contractors/vendors/suppliers/service providers/operators
- Business partners whether acting on behalf of the companies or not or those that provide services, goods and other benefits to the companies such as medical service providers, banks, pension and provident funds, administrators, service providers, insurance companies, advertising, marketing or PR agencies, wellness or health providers
- Users of website/applications/mobile applications/social media portals or platforms whether in order to enquire more about the companies or to do business with the companies
- Persons who interact with the companies physically or enter sites, offices, parking areas, manufacturing site, showroom and all facilities of the company or interact via websites/email/correspondence.

9.3 REASONS FOR PROCESSING PERSONAL INFORMATION

This Processing is required by the Company to allow them to perform the following (without detracting from the generality hereof):

- to pursue their business objectives and strategies;
- to comply with a variety of lawful obligations, including without detracting from the generality thereof, to carry out actions for the conclusion and performance of a contract as between the company and the Data Subject;
- to put in place protective mechanisms to protect the Data Subject's and / or the Company's legitimate interests including the performance of risk assessments and risk profiles where applicable and necessary;
- to obtain as required by law or to protect the respective party's legitimate interests,
- to obtain or provide Personal Information from a credit bureau or credit provider or credit association, information about certain Data Subject's credit record, including personal information about any judgement or default history;
- for the purposes of making contact with the Data Subject and attending to the Data Subject's enquiries and requests;
- for the purpose of providing the Data Subject from time to time with information pertaining to the Companies, their officers, employees, services and goods and other ad hoc business related information;
- to pursue the Data Subject's and/or Companies' legitimate interests, or that of a third party to whom the Personal Information is supplied;
- for the purposes of providing, maintaining, and improving the Companies' Products and Services, and to monitor and analyse various usage and activity trends pertaining thereto;
- for the purposes of performing internal operations, including management of

employees, employee wellness programmes, the performance of all required HR and IR functions, callcentres, customer care lines and enquiries, attending to all financial matters including budgeting, planning, invoicing, facilitating and making payments, making deliveries, sending receipts, and generally providing commercial support, where needed, requested or required;

- for the purpose of preventing fraud and abuse of the Companies' processes, systems, procedures and operations, including conducting internal and external investigations and disciplinary enquiries and hearings.

9.4 STORAGE AND RETENTION AND DESTRUCTION OF INFORMATION

- The Company will ensure that the Data Subject's Personal Information is securely stored electronically, which for operational reasons, will be accessible to certain categories of authorised persons within the company on a need to know and business basis, save that where appropriate, some of the Data Subject's Personal Information may be retained in hard copy and stored securely.
- All such Personal Information will be held and / or stored securely. In this regard the Company will ensure that they perform regular audits regarding the safety and the security of all Data Subject's Personal Information.
- Appropriate technical and organisational measures will be taken by the companies to ensure that Personal Information remains confidential and secure against unauthorised or unlawful processing and accidental loss or destruction or damage.
- Once the Data Subject's Personal Information is no longer required due to the fact that the purpose for which the Personal Information was held has come to an end and expired, such Personal Information will be safely and securely archived for the required prescribed periods or longer should this be required by the company. The company thereafter will ensure that such Personal Information is permanently destroyed.

9.5 ACCESS BY OTHERS AND CROSS BORDER TRANSFER

The Company may from time to time have to disclose a Data Subject's Personal Information to other parties, including organs of state, other departments or subsidiaries, product or third party service providers, regulators and or governmental officials, overseas service providers and or agents, but such disclosure will always be subject to an agreement which will be concluded as between the company and the party to whom it is disclosing the Data Subject's Personal Information to, which contractually obliges the recipient of this Personal Information to comply with strict confidentiality and data security conditions. Where Personal Information and related data is transferred to a country which is situated outside the borders of South Africa, the Data Subject's Personal Information will only be transferred to those countries which have similar data privacy laws in place or where the recipient of the Personal Information is bound contractually to a lesser set of obligations than those imposed by POPIA.

9.5.1 Request procedure:

POPIA provides that a Data Subject may, upon proof of identity, request the Responsible Party 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.

POPIA provides that a Data Subject may object, at any time, to the Processing of personal information by the Responsible Party, on reasonable grounds relating to his/her particular situation, unless legislation provides for such Processing. In order to object the Data Subject must complete

Annexure 3 and submit it to the Information Officer at the postal or physical address or electronic mail address set out in section 4 of this Manual.

A Data Subject may also request the Responsible Party 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 Responsible Party is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

A Data Subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address or electronic mail address set out in section 4 of this Manual on the standard **Annexure 4**.

ANNEXURE 1 - REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))
[Regulation 10]

A. Name of private body

B. Particulars of person requesting access to the record

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

Full names and surname:

Identity number:.....

Postal address:

Telephone number: (.....)

E-mail address:

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

C. Particulars of person on whose behalf request is made

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

Full names and surname:

Identity number:

D. Particulars of record

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

1. Description of record or relevant part of the record:

.....

2. Reference number, if available:

.....

3. Any further particulars of record:

.....

E. Fees

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

Reason for exemption from payment of fees:

.....

F. Form of access to record - Mark the appropriate box with an X.

1. If the record is in written or printed form:					
	Copy of Record		Inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images transcription of the images*		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	Printed record of copy		Printed copy of information derived from the record		Copy in computer readable form* (stiffy or compact disk)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
--	------------	-----------

G. Particulars of right to be exercised or protected

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

1. Indicate which right is to be exercised or protected:

.....
.....

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

.....
.....

H. Notice of decision regarding request for access

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

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

.....

Signed at this day..... ofyear

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE

ANNEXURE 2 – PRESCRIBED FEES FOR REQUESTING RECORDS:

<u>DETAILS</u>	<u>AMOUNT</u>
Fee for requesting records <i>*Note: exclusion if individual is requesting access to their personal information</i>	R60 -00
Copy per page	R1-10
Printing per page	R1-00
Transcription of visual image per A4 Page	R40 - 00
Copy of visual image	R60 -00
Transcription of an audio recording – per A4page	R20 -00
Copy of an audio recording	R20 -00
Search and preparation of the record for disclosure	R30-00 per hour or part thereof, excluding the first hour reasonably required for search and preparation

ANNEXURE 3– OBJECTION

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE
PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 2]**

Note:

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

A	DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number:	
Residential, postal or business address:	<div></div> <div></div> <div></div> <div></div> <div align="right">Code (_____)</div>
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered name of responsible party:	
Residential, postal or business address:	<div></div> <div></div> <div></div> <div></div> <div align="right">Code (_____)</div>
Contact number(s):	
Fax number / E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) TO (f)(Please provide detailed reasons for the objection)

Signed at on this day of 20.....

_____.

Signature of data subject / designated person

ANNEXURE 4– RECTIFICATION

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

Request for: Mark the appropriate box with an “X”.

- ☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- ☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF DATA SUBJECT
Name(s)/registered name of data subject:	
CoReg. / Identity Number:	
Address:	_____ _____ Code (____)
Contact number(s):	
E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) / Registered name of responsible party:	
Residential, postal or business address:	_____ _____ _____ Code (____)
Contact number(s):	
E-mail address:	
C	INFORMATION TO BE CORRECTED / DELETED / DESTROYED
D	Reasons for *corrections or deletion of the personal information about the data subject in terms of section 24(1)(a) which is in possession or under the control of the responsible party; and or reasons for *destruction or deletion of a record of personal information about the data subject in terms of section 24(1)(b) which the responsible party is no longer authorised to retain

Signed at _____ on this _____ day of _____ 20_____

_____*Signature of data subject / designated person*