

MANUAL ON ACCESS TO INFORMATION [PAIA MANUAL]

Prepared in accordance with section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”) (as amended) and in compliance with the requirements of the Protection of Personal Information Act, No.4 2013 (“POPIA”).

CHARLES SHERMAN, KRUGER & PROSSER “CSKP”]

[Registration No: 1977/000613/21]

[hereinafter also referred to the “Company” or “private body” or “AI”]

July 2021
October 2021

CHARLES SHERMAN, KRUGER & PROSSER

[Registration No: 1977/000613/21]

MANUAL ON ACCESS TO INFORMATION [PAIA MANUAL]

Table of Contents

	<u>Page No:</u>
1. INTRODUCTION	3
2. CONTACT DETAILS	3
3. GUIDE OF THE SA INFORMATION REGULATOR	4
4. INFORMATION OFFICER	4
5. ACCESS TO INFORMATION & RECORDS HELD BY THE COMPANY.....	5
6. SUBJECTS & CATEGORIES OF RECORDS HELD BY THE COMPANY.....	5
7. PURPOSE OF PROCESSING PERSONAL INFORMATION	7
8. DATA SUBJECTS CATEGORIES AND THEIR PERSONAL INFORMATION	8
9. PLANNED RECIPIENTS OF PERSONAL INFORMATION	8
10. TRANS-BORDER FLOWS OF MPERSONAL INFORMATION	8
11. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION	8
12. REQUEST FOR ACCESS TO INFORMATION	8
13. REFUSAL OF ACCESS TO INFORMATION.....	9
14. PRESCRIBED FEES	10
15. DECISION	12
16. REMEDIES FOR REFUSAL OF A REQUEST	12
17. AVAILABILITY AND UPDATING OF THIS MANUAL	12
18. LIST OF APPLICABLE LEGISLATION	12
<u>ANNEXURE:</u> POPI PRIVACY NOTICE	14

1. INTRODUCTION

1.1. The Promotion of Access to Information Act, No. 2 of 2000 (the “Act”), as amended, gives effect to section 32 of the Constitution of the Republic of South Africa 108 of 1996 (the “Constitution”) which gives the right to access to any information held by the state and/or another person, that is required for the exercise or protection of any right.

1.2. Where a request is made in terms of the Act, the body to whom the request is made must consider whether to release the information, giving due consideration to applicable legislative and/or regulatory requirements, except where the Act expressly states that the records containing such information may not be released.

1.3. This manual, which is compiled in accordance with section 51 of the Act and also complies with the requirements of the Protection of Personal Information Act, No. 4 of 2013 (“POPIA”), is intended to inform a requestor of information, about the procedure for requesting information from the holder. This manual further incorporates the requirements of the POPIA and sets out the framework for our company’s compliance with the same.

1.4. Where reference is made to the “processing” of personal information, this will include any activity in which information is worked with, from the time that it is collected, up to the time that it is destroyed, regardless of whether it is worked with manually, or by automated systems.

Nature of Business: The Company operates as a registered Legal Practice.

2. CONTACT DETAILS

Name of AI: CHARLES SHERMAN, KRUGER & PROSSER [**“CSKP”**]

Head of AI: Mr. Richardt Lubbe [Managing Director]

Information Officer: Mr. Richardt Lubbe

Physical Address:

90 – 92 Sixth Street

Springs

Postal Address:

P O Box 886

Springs

1650

Telephone Number: 011 812 1440

Facsimile Number: 011 362 5090

Email address: rlubbe@cslp.co.za

Website:

3. GUIDE OF THE SOUTH AFRICAN INFORMATION REGULATOR

3.1. A guide to the Act [as contemplated under section 10 of the PAIA Act] is available from the South African Information Regulator. The guide contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act.

3.2. The Act grants a requester access to records of the FSP, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

3.3. Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.

3.4. Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Information Regulator, which will contain information to exercise Constitutional Rights. The Guide is available from the Information Regulator

3.5. Any enquiries regarding this guide and its contents should be directed to:

The South African Information Regulator:

Postal Address: P O Box 31533, Braamfontein, Johannesburg 2017

Telephone: +27 (0)10 023 5200

Website:

E-mail: enquiries@info regulator.org.za

4. INFORMATION OFFICER

4.1. The Head of the COMPANY, Mr. Richardt Lubbe is the appointed Information Officer of **CSKP**

His contact details are listed hereunder:

- Physical Address:
90 – 92 Sixth Street
Springs
- Postal Address:
P O Box 886
Springs
1650
- Telephone: 011 812 1440
- Email: rlubbe@cslp.co.za

4.2. The Information Officer shall oversee the functions and responsibilities as required in terms of the Act and section 55 of POPIA, after registration with the Information Regulator.

4.3. The Information Officer may delegate some of the functions and responsibilities delegated to him/her by the Act and POPIA, to a Deputy Information Officer.

4.4. All requests for information must be addressed to the Information Officer.

5. ACCESS TO INFORMATION AND RECORDS HELD THE AI.

5.1. Records held by **CSKP** may be accessed by request only, once the prerequisite requirements for access have been met.

5.2. A requester is any person requesting access to information. There are two types of requesters:

a. Personal Requester

i. A personal requester is a requester who is seeking access to information containing personal information about the requester.

ii. **CSKP** will voluntarily provide the requested information or give access to any record concerning the requester's personal information. The prescribed fee for the reproduction of the information requested will be charged (if applicable).

b. Other Requesters

i. This requester is entitled to request access to information on third parties.

ii. In considering such a request, the Information Officer will take all reasonable steps to inform the third party to whom the requested record relates of the request.

iii. The Information officer will inform the third party that he/she may make a written or oral representation stating why the request should be refused or, where required, give written consent for the disclosure of the Information.

iv. The requester must fulfil the prerequisite requirements, including the payment of a request and access fee.

6. SUBJECTS AND CATEGORIES OF RECORDS HELD BY THE AI.

General information about **CSKP** can be accessed via the internet on www., which is available to all persons who have access to the internet.

The subjects on which **CSKP** holds records and the categories on each subject in terms of Section 51(1) are as listed below. **Please note that a requester is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the Act:**

A. COMPANIES ACT RECORDS

- Documents of Incorporation;
- Memorandum of Incorporation;
- Minutes of meetings of the Board of Directors;
- Proxy forms;
- Share Register and other statutory registers and/or records and/or documents;
- Special resolutions / resolutions passed;
- Records relating to the appointment of:
 - Auditors;
 - Directors;
 - Prescribed Officer [i.e. Key Individual]; and
 - Secretary

B. FINANCIAL RECORDS

- Accounting records;
- Annual Financial Reports;

- Annual Financial Statements;
- Banking details and bank accounts;
- Debtors / Creditors statements and invoices;
- Policies and procedures.

C. INCOME TAX RECORDS

- Tax Returns;
- PAYE records;
- Documents issued to employees for Income Tax purposes;
- Records of payments made to SARS on behalf of employees;
- All other statutory compliances:
 - VAT;
 - Regional Services Levies;
 - Skills Development Levies;
 - UIF;
 - Workmen`s Compensation.

D. PERSONNEL DOCUMENTS AND RECORDS

- Accident books and records;
- Address lists;
- Disciplinary Code of records;
- Employee benefits arrangements, rules and records;
- Employment records;
- Forms and Applications;
- Grievance procedures;
- Leave records;
- Medical Aid Records;
- Payroll reports / Wage Register;
- Pension fund Records;
- Safety, Health and Environmental records;
- Salary records;
- SETA records;
- Standard Letters and Notices;
- Training Manuals and Records;
- Workplace and union agreements and records.

E. PROCUREMENT RECORDS

- Standard Terms and Conditions for supply of services and products;
- Contractor and Supplier agreements;
- Lists of Suppliers, Product Providers, Products, Services and Distribution; and
- Policies and Procedures.

F. CLIENT RECORDS

- The AI collects personal information directly / indirectly from the following data subjects *[a data subject is the owner of the personal information]*:
 - Prospective clients who enquire about our services
 - Clients who have requested services from **CSKP** directly / indirectly
- Personal information is collected directly/ indirectly from clients / potential clients.

- Some of the personal information that **CSKP** hold may include, first and last name, email address, a home, postal or other physical address, other contact information, title, birth date, gender, occupation, residency status, investments, assets, liabilities, insurance, income, expenditure, family history, medical information, banking details and more.

G. MARKETING INFORMATION

- Advertising and Promotional Information

H. RISK MANAGEMENT AND AUDIT

- Audit Reports;
- Risk management frameworks and policies;
- Risk management plans.

I. IT RELATED RECORDS

- Computer / mobile device usage policy documents;
- Disaster Recovery Plans;
- Information Security Policies / standards / procedures;
- IT systems and user manuals;
- System documentation and manuals.

7. PURPOSE OF PROCESSING PERSONAL INFORMATION

- The AI collects, hold, use and disclose personal information mainly to provide clients / potential clients with access to the services that the AI provides. The AI will only process personal information for a purpose clients / potential clients would reasonably expect, including:
 - Complying with the obligations contained in the contract concluded between clients and the AI
 - Providing clients / potential clients with advice and services that suit their needs as requested
 - To verify identity of clients / potential clients
 - To notify clients / potential clients of new developments that may be of interest to them
 - To confirm, verify and update client details
 - To comply with any legal and regulatory requirements to which the AI must comply
- Failing to provide compulsory information may lead to the AI's inability to carry out the functions necessary to perform in terms of the services requested by the client.

8. DATA SUBJECTS CATEGORIES AND THEIR PERSONAL INFORMATION

- Employees: Record of employee life cycle;
- Suppliers: Record of employee life cycle;
- Clients:
 - Service requirement related information;
 - Regulatory information requirements to underpin requested service mandates;
 - Service delivery related information;
 - .
- Product Suppliers: Agreements and Record of life cycle.

9. PLANNED RECIPIENTS OF PERSONAL INFORMATION

- Statutory authorities;
- Employees of the FSP;
- Law enforcement;
- Tax authorities;

10. TRANS-BORDER FLOWS OF PERSONAL INFORMATION

- Except where demanded by the client's service request the AI does not have any trans-border flow of information.

11. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

- Cyber security systems and measures;
- Information security policies;
- Data privacy policies;
- Training in information security;
-

12. REQUEST FOR ACCESS TO INFORMATION

12.1. The requester must comply with all the procedural requirements contained herein relating to the request for access to information.

12.2. The requester must complete the prescribed form available on the website of the Department of Justice at [http://www.justice.gov.za/forms/paia/J752 paia Form C.pdf](http://www.justice.gov.za/forms/paia/J752%20paia%20Form%20C.pdf). Alternatively Annexure A of the **CSKP** POPI Privacy Notice [which is attached hereto] can be used. Submit same, with payment and/or proof of payment as well as payment of the requested fee and/or a deposit (if applicable) to the Information Officer.

12.3. The prescribed form must be filled in with sufficient information to enable the Information Officer to identify:

- a. the information or records requested;
- b. the identity of the requester;
- c. the form of access required;
- d. the email address, postal address or fax number of the requester in the Republic; or
- e. if the requester wishes to be informed of the decision in a different manner (in addition to written), the manner and particulars thereof; and
- f. the right which the requester is seeking to exercise or protect with an explanation of the reason the record is required

12.4. **CSKP** will process the request within 30 (thirty) days, unless the requester has stated special reasons to the satisfaction of the Information Officer, that circumstances dictate urgency.

12.5. The requester shall be advised whether access is granted or denied in writing.

12.6. In addition, the Information Officer will include the reason for the decision.

12.7. Should a request be made on behalf of another person, then the requester must submit proof of the capacity in they are acting to the satisfaction of the Information Officer (section 53(2)(f)).

- 12.8. Should an individual be unable to complete the prescribed form, owing to illiteracy or disability, such a person may make the request orally.
- 12.9. The requester must pay the prescribed fee before the request can be processed.
- 12.10. All information listed in Par 12.3 should be provided, failing which, the process will be delayed until the required information is provided.
- 12.11. The prescribed time periods will not commence until the requester has furnished all the required information and paid the prescribed fee.
- 12.12. The Information Officer shall partition information, if possible, and only grant the requester, access to the requested portion.

13. REFUSAL OF ACCESS TO INFORMATION

- 13.1. is entitled to refuse a request for information in terms of the Act.
- 13.2. Access to information may be subject to the grounds of refusal.
- 13.3. Amongst others, records deemed confidential on the part of a third party, will require permission from the third party concerned, in addition to normal requirements, before the granting of access may be considered.
- 13.4. The main grounds for to refuse a request for information are:
 - a. mandatory prohibition on the processing of special personal information, if the records are classified as special personal information in terms of section 26 of POPIA;
 - b. mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic person, as included in POPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person;
 - c. mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of POPIA;
 - d. mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;
 - e. mandatory protection of the safety of individuals and the protection of property (section 66);
 - f. mandatory protection of records that would be regarded as privileged in legal proceedings (section 67).
 - g. the commercial activities (section 68) of a private body, such as the AI, which may include:
 - i. trade secrets;
 - ii. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests;
 - iii. information disclosed in confidence by a third party to **CSKP** if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
 - iv. the information which, if disclosed could put the private body, such as the AI or a third party at a disadvantage in negotiations or commercial competition;
 - v. a computer program which is owned by the AI and which is protected by copyright;
 - vi. research information (section 69) of the AI or a third party, if its disclosure would disclose the identity of the AI, the researcher, or the subject matter of the research and would place the research at a serious disadvantage.

13.5. Requests for information that are frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

13.6. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

13.7. If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record.

13.8. Such notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act.

13.9. If the record 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 the Information Officer refuses access to such record.

14. PRESCRIBED FEES (SECTION 51 (1) (f))

14.1. The Act provides for two types of fees, namely:

- a. A request fee, which is a form of an administration fee to be paid by all requesters except personal requesters, before the request is considered and is not refundable; and
- b. An access fee, which is paid by all requesters if a request for access is granted. This fee is inclusive of costs involved by the private body in obtaining and preparing a record for delivery to the requester.

14.2. When a request is received by the Information Officer, he/she shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before processing of the request.

14.3. If the search for the information has been made and the preparation of the record for disclosure, including an arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

14.4. If the preparation of the record requested requires more than the prescribed 6 (six) hours, a deposit of a third of the payable access fee shall be paid.

14.5. The Information Officer shall withhold a record until the requester has paid the requested fees.

14.6. A requester whose request for access to information has been granted must pay an access fee that is calculated to include, where applicable, the request fee, processing fee for reproduction, search, and preparation, and for any time reasonably required over the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.

14.7. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer will repay the deposit to the requester.

14.8. Where **CSKP** has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for the reproduction of the record in question. No notice has been submitted by the AI to the Minister of Justice and Constitutional development regarding the categories of records, which are available without a person having to request access in terms of section 52 (2) of PAIA. However, the information on the website of **CSKP** is automatically available without having to request access in terms of PAIA.

14.9. Where a requester submits a request for access to information about a person other than the requester himself/herself, a request fee in the amount of R50,00 is payable up-front before the AI will further process the request received.

14.10. An access fee is payable where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act or exclusion is determined by the Minister in terms

of section 54(8). A requester may query the payment of the requested fee and/or deposit with the Information Officer. Should the requester find the decision unsatisfactory, he/she may lodge an application with a court.

14.11. The Fee Schedule is as follows:

FEE TYPE	DISCRIPTION	FEE
REQUEST FEE		
	Fees for requesting records [Excl. exempt people in terms of the Act]	R50
ACCESS FEES		
	Information in an A-4 size page photocopy or part thereof	R1.10
	A printed copy of an A-4 size page or part thereof	R0.75
	A copy in computer – readable format, for example: Compact disc	R70.00
	A transcription of visual images, in an A-4 size page or part thereof	R40.00
	A copy of visual images	R60.00
	A transcription of an audio record for an A-4 size page or part thereof	R20.00
	A copy of an audio record	R30.00
	Search and preparation of the record for disclosure. Excluding the first hour reasonable required for the search and preparation.	R30.00 per hour
	Postage Fee	Actual fee incurred

15. DECISION

15.1..... will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give written notice with reasons to that effect.

15.2. The 30 (thirty) day period within which must decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large amount of information, or the request requires a search for information held at another location and the information cannot reasonably be obtained within the original 30 (thirty) day period.

15.3. will notify the requester in writing should an extension be sought.

16. REMEDIES FOR REFUSAL OF A REQUEST

16.1. Internal Remedies

- a. does not have internal appeal procedures as the decision made by the Information Officer is final.
- b. A requester will need to exercise external remedies should the request for information be refused, and they are not satisfied with the decision by the Information Officer.

16.2. External Remedies

- a. A requestor and/or third party that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of receipt of notification of the decision apply to the High Court with jurisdiction, for relief.
- b. For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court, and a Magistrate's Court designated by the Minister of Justice and Constitutional Development.

17. AVAILABILITY AND UPDATING OF THIS MANUAL

17.1. This Manual is made available in terms of Regulation Number R.187 of 15 February 2002. **CSKP** will update this Manual at such intervals as may be deemed necessary.

17.2. This Manual of **CSKP** is available to view at its premises and on its website on www.....co.za

18. LIST OF APPLICABLE LEGISLATION

Records of the Company and other legal entities in which the Company has a direct controlling interest or an indirect controlling interest [through its subsidiaries] may be kept by or on behalf of the company in accordance with the following legislation [some of which legislation may not be applicable to the Company], as well as with legislation that may apply to the company from time to time:

- Basic Conditions of Employment Act 57 of 1997
- Broad-Based black Economic Empowerment Act 53 of 2003
- Collective Investment Schemes Control Act 45 of 2002
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Currencies and Exchange Act 9 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Financial Institutions [Protection of Funds] Act 28 of 2001
- Financial Services Board Act 97 of 1990
- Financial Services Ombud Schemes Act 37 of 2004
- Income tax Act 58 of 1962
- Inspection of Financial Institutions Act 80 of 1998
- Labour relations Act 66 of 1995
- Long-term Insurance Act 52 of 1998

Short-term Insurance Act 53 of 1998
Occupational Health and safety Act 85 of 1993
Regulation of Interception of Communications and Provision of Communication Related Information Act 70/ 2002
Pension Funds Act 24 of 1956
Prevention of Organized Crime Act 121 of 1998
Prevention and Combating of Corrupt Activities Act 12 of 2004
Promotion of Access to Information Act 2 of 2000
Protected Disclosure Act 97 of 1998
Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
Skills development Act of 1998
Skills Development Levy Act 9 of 1999
Securities Services Act 25 of 2004
Securities transfer Tax Act 25 of 2007
Securities Transfer Tax Administration Act 26 of 2007
Trade marks Act 194 of 1993
Trust Property Control Act 57 of 1988
Unemployment Insurance Act 30 of 1966
Unemployment Insurance Contributions Act 4 of 2002
Value Added Tax Act 89 of 1991

CHARLES SHERMAN, KRUGER & PROSSER

[Registration No: 1977/000613/21]

[Hereinafter also referred to as an Accountable Institution or the Organisation]

PRIVACY NOTICE – PROTECTION OF PERSONAL INFORMATION ACT (“POPI Act”)

The purpose of this “Privacy Notice” is to explain to you the key elements of the POPI Act, which finally came into effect on 01 July 2021 and our obligation and commitment to be compliant with its requirements applicable to us at all times

We understand that your personal information is important to you. Your privacy is just as important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer. Details of our Information Officer, which is also registered with the Information Regulator are as follows:

- Name Mr. Richardt Lubbe
- Contact Number 011- 812 1440 or 079 511 0072
- Email Address rlubbe@cslp.co.za

The sources of collection of personal information:

In general, we collect personal information from the following data subjects *[a data subject is the owner of the personal information such as yourself]*:

- Prospective clients who enquire about our services
- Clients who have appointed CARLES SHERMAN, KRUGER & PROSSER to execute an agreed upon service
- Through the completion of any internal CARLES SHERMAN, KRUGER & PROSSER form *[e.g. Interview Form, etc.]*

Safeguarding and Securing the Data

CARLES SHERMAN, KRUGER & PROSSER is committed to securing client’s data and keeping it confidential. CARLES SHERMAN, KRUGER & PROSSER will do all in its power to prevent data theft, unauthorized access, and disclosure by implementing the latest technologies and software, which help us safeguard all the information we collect from clients.

Despite our best efforts in this regard safeguarding and securing data can never be 100% guaranteed, therefore it is important that you always take note of the CARLES SHERMAN, KRUGER & PROSSER disclaimer on all CARLES SHERMAN, KRUGER & PROSSER emails and financial reports generated by us.

Law authorising or requiring collecting of the personal information:

As an accountable institution, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant services to you:

- Financial Intelligence Centre Act 38 of 2001;
- Protection of Personal Information (POPI) Act 4 of 2013

Purpose for Processing your Information:

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the contract concluded between yourself and the Organization
- To execute your service requests
- To confirm, verify and update your details
- To comply with any legal and regulatory requirements to which we as an organisation must comply

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, qualifications, past employment, residency status, and your banking details.

Primarily the aforementioned personal information is mandatory to provide within the context of our service requirements and disclosures.

Failing to provide compulsory information may lead to our organisation's inability to carry out the functions necessary to perform as an Accountable Institution.

Third parties and your personal information

We may need to share your information to third parties. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- The Compliance Officer of our organisation.
- Analytics and search engine providers assisting in the enhancement of our websites;
- Information Technology specialists assisting us with data storage, security, processing, analytics, etc;
- Auditors of the Organisation;
- Regulatory or governmental authorities;

The Transfer of your personal information outside of the Republic of South Africa

Currently the Organisation has no processing locations outside the borders of South Africa.

Complaints and objections

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you;
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed;
- Lodge a complaint with our Information Officer (please complete Annexure A).

The Information Regulator

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: complaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/index.html>

ANNEXURE A

POPI COMPLAINT FORM

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act.

Please submit your complaint to the Information Officer:	
Name	Mr. Richardt Lubbe
Contact Number	011- 812 1440
Email Address:	rlubbe@cslp.co.za

Where we are unable to resolve your complaint, to your satisfaction you have the right to complaint to the Information Regulator.

The Information Regulator: Adv Pansy Tlakula

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: complaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/index.html>

A. Particulars of Complainant	
Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	
B. Details of Complaint	
C. Desired Outcome	
D. Signature Page	
Signature:	
Date:	