

SBV SERVICES (PTY) LTD PAIA AND POPI INFORMATION MANUAL

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This is a Manual as prescribed by:

The Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) (PAIA); and
The Protection of Personal Information Act, 2013 (Act No. 4 of 2013) (POPI)

This is a manual as prescribed by the Act and will be lodged with the South African Human Rights Commission.

As it is not a policy it is not in the standard format.

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1. PURPOSE OF THE MANUAL

This Manual:

- 1.1 for the purposes of PAIA, details the procedure to be followed by a Requester and the manner in which a Request for Access will be facilitated; and
- 1.2 for the purposes of POPIA, amongst other things, details 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 recipients to whom Personal Information may be supplied.

2. COMPANY INFORMATION

NAME	SBV SERVICES (PTY) LTD
GROUP CHIEF EXECUTIVE OFFICER	MARK BARRETT
POSTAL ADDRESS	PN SUITE 48, PRIVATE BAG X1, MELROSE ARCH 2076
STREET ADDRESS	SBV HOUSE, CNR 11 TH AVENUE & 8 TH STREET, HOUGHTON, JHB
PHONE NUMBER	+27 011 283 2000
FAX NUMBER	+27 011 283 2201
EMAIL	supportoffice@sbv.co.za
INFORMATION OFFICER	Shalin Pillai Chief Technology Officer
WEBSITE	www.sbv.co.za

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3. DEFINITIONS AND INTERPRETATION

In this Manual, the following words and expressions have the following meanings:

- 3.1 **Company** means SBV Services (Pty) Ltd (registration number 1986/003865/07), a company duly registered and incorporated with limited liability in accordance with the company laws of the Republic of South Africa and having its principal place of business situated at SBV House, Cnr 11th Avenue & 8th Street, Houghton, Johannesburg, Republic of South Africa;
- 3.2 **Conditions for Lawful Processing** means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA;
- 3.3 **Constitution** means the Constitution of the Republic of South Africa, 1996;
- 3.4 **Customer** refers to any natural or juristic person that received or receives services from the Company;
- 3.5 **Data Subject** has the meaning ascribed thereto in section 1 of POPIA;
- 3.6 **Head of the Company** means the “head” as defined in section 1 of PAIA and referred to in clause 4;
- 3.7 **Information Officer** means the SBV Information Officer as appointed by the SBV Chief Executive Officer as referred to in clause 4;
- 3.8 **Manual** means this manual prepared in accordance with section 51 of PAIA and regulation 4(1) (d) of the POPIA Regulations;
- 3.9 **PAIA** means the Promotion of Access to Information Act, 2000;
- 3.10 **Personal Information** has the meaning ascribed thereto in section 1 of POPIA;
- 3.11 **Personnel** refers to any person who works for, or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the Company, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;
- 3.12 **POPIA** means the Protection of Personal Information Act, 2013;
- 3.13 **POPIA Regulations** mean the regulations promulgated in terms of section 112(2) of POPIA;
- 3.14 **Private Body** has the meaning ascribed thereto in sections 1 of both PAIA and POPIA;
- 3.15 **Processing** has the meaning ascribed thereto in section 1 of POPIA;
- 3.16 **Responsible Party** has the meaning ascribed thereto in section 1 of POPIA;
- 3.17 **Record** has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;
- 3.18 **Requester** has the meaning ascribed thereto in section 1 of PAIA;
- 3.19 **Request for Access** has the meaning ascribed thereto in section 1 of PAIA; and

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3.20 **SAHRC** means the South African Human Rights Commission;

3.21 **SBV Structure** means for purpose of this manual refers to:

- SBV Services (Pty)Ltd
- SBV Services Lesotho (Pty) Ltd
- Security Unlimited (Pty) Ltd
- SBV Services Namibia (Pty) Ltd

Capitalised terms used in this Manual have the meanings ascribed thereto in section 1 of POPIA and PAIA as the context specifically requires, unless otherwise defined herein.

4. THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION

4.1 The SAHRC has compiled a guide, as contemplated in section 10 of the South African Human Rights Commission Act, 2013 (“**the Act**”) containing information to assist any person who wishes to exercise any right as contemplated in the Act.

4.2 This guide is available from the SAHRC at:

POSTAL ADDRESS	Private Bag 2700 Houghton 2041
WEBSITE	www.sahrc.org.za
TELEPHONE NUMBER	011 877 3600
FAX NUMBER	011 403 0684

5. PUBLICATION AND AVAILABILITY OF CERTAIN RECORDS IN TERMS OF PAIA

5.1 Schedule of Records

The Schedule of Records as contained in **Annexure 1** of this Manual details the Records that are held and/or Processed by the Company for the purposes of PAIA and POPIA respectively. Such Access to such Records may not be granted if they are subject to the grounds of refusal which are specified in clause 7 below.

5.2 List of applicable legislation

The Company retains records which are required in terms of legislation other than PAIA.

Certain legislation provides that private bodies shall allow certain persons access to specified records, upon request. Legislation that 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 the PAIA are set out in **Annexure 2**.

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6. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS IN TERMS OF PAIA

The following are the grounds on which the Company may, subject to the exceptions contained in Chapter 4 of PAIA, refuse a Request for Access in accordance with Chapter 4 of PAIA:

- 6.1 mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
- 6.2 mandatory protection of the commercial information of a third party, if the Records contain:
 - (1) trade secrets of that third party;
 - (2) financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
- 6.3 information disclosed in confidence by a third party to the Company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;
- 6.4 mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 6.5 mandatory protection of the safety of individuals and the protection of property;
- 6.6 mandatory protection of Records that would be regarded as privileged in legal proceedings;
- 6.7 protection of the commercial information of the Company, which may include:
 - (1) trade secrets;
 - (2) financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Company;
 - (3) information which, if disclosed, could put the Company at a disadvantage in contractual or other negotiations or prejudice the Company in commercial competition; and/or
 - (4) computer programs which are owned by the Company, and which are protected by copyright and intellectual property laws;
 - (5) research information of the Company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
 - (6) requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

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7. INFORMATION OR RECORDS NOT FOUND

If the Company cannot find the records that the Requester is looking for despite reasonable and diligent searches being conducted and it believes either that the records are lost or that the records are in its possession but unattainable, the Requester will receive a notice in this regard from the Information Officer in the form of an affidavit setting out the measures taken to locate the document and accordingly the inability to locate the document.

8. REMEDIES AVAILABLE TO THE REQUESTER UPON REFUSAL OF A REQUEST FOR ACCESS IN TERMS OF PAIA

- 8.1 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.
- 8.2 In accordance with sections 56(3) (c) and 78 of PAIA, a Requester may apply to a court for relief within 180 (one hundred and eighty) days of notification of the decision for appropriate relief.

9. PROCEDURE FOR A REQUEST FOR ACCESS IN TERMS OF PAIA

- 9.1 A Requester must comply with all the procedural requirements as contained in section 53 of PAIA relating to a Request for Access to a Record.
- 9.2 A Requester must complete the prescribed Request for Access form attached as **Annexure 3** and submit the completed Request for Access form as well as payment of a request fee (if applicable) and a deposit (if applicable), to the Information Officer at the postal or physical address, facsimile number or electronic mail address stated in clause 4 above.
- 9.3 The Request for Access form must be completed with enough detail so as to enable the Information Officer to identify the following:
 - (1) the Record/s requested;
 - (2) the identity of the Requester;
 - (3) the form of access that is required, if the request is granted;
 - (4) the postal address or fax number of the Requester; and
 - (5) the right that the Requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.
- 9.4 If a Request for Access 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 reasonable satisfaction of the Information Officer.

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- 9.5 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 9.6 The Company will voluntarily provide the requested Records to a Personal Requester (as defined in section 1 of PAIA). The prescribed fee for reproduction of the Record requested by a Personal Requester will be charged in accordance with section 54(6) of PAIA and paragraph 11 below.

10. FEES

- 10.1 When the Request for Access is received by the Information Officer, the Information Officer will by notice require the Requester, other than a Personal Requester, to pay the prescribed request fee (if any), before further processing of the Request for Access.
- 10.2 Prescribed request fees are set out in **Annexure 4**.
- 10.3 If the search for a Record requires more than the prescribed hours for this purpose, the Information Officer will notify the Requester to pay as a deposit, the prescribed portion of the access fee (being not more than one third) which would be payable if the Request for Access is granted.
- 10.4 The Information Officer will withhold a Record until the Requester has paid the fees set out in **Annexure 4**.
- 10.5 A Requester whose Request for Access to a Record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the Record for disclosure, including making arrangements to make it available in a requested form provided for in PAIA.
- 10.6 If a deposit has been paid in respect of a Request for Access which is refused, the Information Officer will repay the deposit to the Requester.

11. DECISION TO GRANT ACCESS TO RECORDS

- 11.1 The Company will decide whether to grant or decline the Request for Access within 30 (thirty) days of receipt of the Request for Access and must give notice to the Requester with reasons (if required) to that effect.
- 11.2 The period referred to above may be extended for a further period of not more than 30 (thirty) days if the Request for Access is for a large number of Records or the Request for Access requires a search for Records held at another office of the Company and the Records cannot reasonably be obtained within the original 30 (thirty) day period.
- 11.3 The Company will notify the Requester in writing should an extension of time as contemplated above be required.

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- 11.4 If, in addition to a written reply from the Information Officer, the Requester wishes to be informed of the decision on the Request for Access in any other manner, the Requester must state the manner and particulars so required.

12. AVAILABILITY OF THE MANUAL

- 12.1 This Manual is made available in terms of PAIA and section 4 of the Regulations to POPIA.
- 12.2 This Manual is also available at: <https://www.sbv.co.za>
- 12.3 This Manual is further available at the offices of SAHRC and at the offices of the Company for inspection during normal business hours. No fee will be levied for inspection as contemplated in this clause.
- 12.4 Copies of the Manual can be obtained from the Information Officer. A fee will be levied for copies of the manual in accordance with **Annexure 4**.

13. PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY THE COMPANY

- 13.1 Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.
- 13.2 The Company needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by the Company. The Company is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:
- (1) is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Company, in the form of privacy or data collection notices. The Company must also have a legal basis (for example, consent) to process Personal Information;
 - (2) is processed only for the purposes for which it was collected;
 - (3) will not be processed for a secondary purpose unless that processing is compatible with the original purpose;
 - (4) is adequate, relevant and not excessive for the purposes for which it was collected;
 - (5) is accurate and kept up to date;
 - (6) will not be kept for longer than necessary;
 - (7) is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and

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communicated by the Company, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;

(8) is processed in accordance with the rights of Data Subjects, where applicable.

13.3 Data Subjects have the right to:

- (1) be notified that their Personal Information is being collected by the Company. The Data Subject also has the right to be notified in the event of a data breach;
- (2) know whether the Company holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
- (3) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
- (4) object to the Company's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Company's record keeping requirements);
- (5) object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
- (6) complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

13.4 Purpose of the Processing of Personal Information by the Company

As outlined above, Personal Information may only be Processed for a specific purpose. The purposes for which the Company Processes or will Process Personal Information is set out in **Part 1 of Annexure 5**.

13.5 Categories of Data Subjects and Personal Information/special Personal Information relating thereto

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. **Part 2 of Annexure 5** sets out the various categories of Data Subjects that the Company Processes Personal Information on and the types of Personal Information relating thereto.

13.6 Recipients of Personal Information

Part 3 of Annexure 5 outlines the recipients to whom the Company may provide a Data Subjects Personal Information to.

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13.7 Cross-border flows of Personal Information

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

- (1) recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
- (2) Data Subject consents to the transfer of their Personal Information; or
- (3) transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- (4) transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- (5) the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent. **Part 4 of Annexure 5** sets out the cross-border transfers of Personal Information and the condition from above that applies thereto.

13.8 Description of information security measures to be implemented by the Company

Part 5 of Annexure 5 sets out the types of security measures to be implemented by the Company in order to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by the Company may be conducted in order to ensure that the Personal Information that is processed by the Company is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

13.9 Objection to the Processing of Personal Information by a Data Subject

Section 11 (3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual as **Annexure 6** subject to exceptions contained in POPIA.

13.10 Request for correction or deletion of Personal Information

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as **Annexure 7** to this Manual.

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RECORDS RETAINED BY COMPANY

ANNEXURE 1

Description of the subjects on which the Company holds records, and the categories of records held on each subject. Each of these records are available on request in terms of PAIA	
Client Services Records	Corporate Governance
Client correspondence	Board meeting minutes
Client contracts	Executive committee meeting minute
Proposal and tender documents	Legal Correspondence
Client fee files	Corporate social investment records
Legal documentation	Legal compliance records
Standard terms and conditions of supply of services	Legal contracts & records of litigations / disputes
Client fee files	Patent Registrations & Documents
Finance and Administration	Human Capital
Accounting records	Career development records
Agreements; Banking records	Personnel information;
Remittances & Invoices and statement	Employment equity reports
Annual financial statements	General terms of employment;
Purchase order	Letters of employment
Tax records and return	Leave records
Annual financial statements	PAYE records and returns;
Remittances;	Performance management records;
Invoices and statements	Assessments; Policies and procedures
Tax records and returns;	Learning & Education
Annual financial statements	Training agreement, records, statistics & learnership programmes
Information Management and Technology	Marketing and Communication

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Agreements	Proposal documents
Information policies	Marketing strategies
Communication platforms management information	Communication strategies
Communication equipment registers	Brand information management
Equipment register	New business development
Standards, procedures and guidelines	Agreements
Cellular phone registration documents	Marketing publications and brochures
Equipment register	Procurement agreements and documentation
Operations	Secretarial Services
Access control records	Applicable statutory documents, including but not limited to, certificates of incorporation and certificates to commence business
Agreements	Corporate structure documents
Archival administration documentation	Shareholder agreements & and other statutory registers
Communication strategies	Resolutions passed (Special / General)
General correspondence	Records relating to the appointment of directors / auditor / secretary / public officer and other officers
Patents and Trademark documents	Share registers;
Service level agreements	Minutes of Board of Directors Meetings
Standard trading terms and conditions of supply of services	Memoranda and Articles of Association
Travel documentation	Records relating to the appointment of directors / auditor / secretary / public officer and other officers
Vehicle registration documents	
Insurance documentation	
Firearm Registrations, licenses and permits	

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LIST OF APPLICABLE LEGISLATION

ANNEXURE 2

Description of the legislation on which the Company holds records other than in terms of the prescribed term described in Annexure 1
• Administration of Adjudication of Road Traffic Offences Act 46 of 1998
• Auditing Profession Act, No 26 of 2005
• Basic Conditions of Employment Act 75 of 1997
• Bills of Exchange Act 34 of 1964
• Broad-Based Black Economic Empowerment Act 53 of 2003
• Companies Act 71 of 2008
• Compensation for Occupational Injuries and Diseases Act 130 of 1993
• Competition Act 89 of 1998
• Constitution of South Africa Act 108 of 1996
• Consumer Protection Act 68 of 2009
• Copyright Act 98 of 1987
• Criminal Procedure Act 51 of 1977
• Currency & Exchanges Act 9 of 1933
• Customs and Excise Act 91 of 1964
• Electronic Communications and Transactions Act 2 of 2000
• Employment Equity Act 55 of 1998
• Environment Conservation Act 73 of 1989
• Financial Advisory & Intermediary Services Act 37 of 2002
• Financial Intelligence Centre Act 38 of 2001
• Firearms Control Act 60 of 2000
• Formalities In Respect of Leases of Land Act 18 of 1969
• Income Tax Act 58 of 1962
• Insolvency Act, No 24 of 1936
• Labour Relations Act 66 of 1995
• Long Term Insurance Act 52 of 1998
• Medical Schemes Act 131 of 1998
• National Building Regulations and Building Standards Act 103 of 1997

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<ul style="list-style-type: none"> • National Credit Act 34 of 2005
<ul style="list-style-type: none"> • National Environmental Management Act 107 of 1998
<ul style="list-style-type: none"> • National Road Traffic Act 93 of 1996
<ul style="list-style-type: none"> • Occupational Health and Safety Act 85 of 1993
<ul style="list-style-type: none"> • Patents Act 57 of 1987
<ul style="list-style-type: none"> • Pension Funds Act 24 of 1956
<ul style="list-style-type: none"> • Prescription Act 18 of 1943
<ul style="list-style-type: none"> • Prevention & Combating of Corrupt Activities Act 12 of 2004
<ul style="list-style-type: none"> • Prevention of Constitutional Democracy Against Terrorist & Related Activities Act 33 of 2004
<ul style="list-style-type: none"> • Prevention of Organised Crime Act 121 of 1998
<ul style="list-style-type: none"> • Private Security Industry Regulatory Authority Act 56 Of 2002
<ul style="list-style-type: none"> • Private Security Industry Levies Act 23 of 2002
<ul style="list-style-type: none"> • Promotion of Access to Information Act 2 of 2000
<ul style="list-style-type: none"> • Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
<ul style="list-style-type: none"> • Protected Disclosures Act 26 of 2000
<ul style="list-style-type: none"> • Protection of Personal Information Act, 4 of 2013
<ul style="list-style-type: none"> • Regulation of Interception of Communications and Provisions of Communication Act 12 of 2004
<ul style="list-style-type: none"> • Skills Development Act 97 of 1998
<ul style="list-style-type: none"> • Tax Administration Act, No 28 of 2011
<ul style="list-style-type: none"> • Transfer Duty Act, No. 40 of 1949
<ul style="list-style-type: none"> • Unemployment Insurance Act, No 63 of 2001
<ul style="list-style-type: none"> • Value Added Tax Act, No 89 of 1991

SBV Services (Pty) Ltd applied its best endeavours to list the applicable legislation relevant to the organisation. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, 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 light thereof.

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ANNEXURE 3

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

 (Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

Request is made in my own name Request is made on behalf of another person.

PERSONAL INFORMATION	
Full Names	
Identity Number	
Capacity in which request is made <i>(when made on behalf of another person)</i>	



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Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
PARTICULARS OF RECORD REQUESTED			
<i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			

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Reference number, if available	
Any further particulars of record	
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	
MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	

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Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES

a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption.</i>
Reason	



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You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer



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Annexure 4 FORM 3

Note:

OUTCOME OF REQUEST AND OF FEES PAYABLE [Regulation 8]

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1. *If your request is granted the —*
 - (a) *amount of the deposit, (if any), is payable before your request is processed; and*
 - (b) *requested record/portion of the record will only be released once proof of full payment is received.*
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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O
R

2. You requested:

Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc.</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of information on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: (<i>Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available</i>)	

Kindly note that your request has been:

Approved

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Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____



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Account number: _____
Branch Code: _____
Reference Nr: _____
Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer

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INFORMATION IN TERMS OF POPI ACT

ANNEXURE 5

PART 1 PROCESSING OF PERSONAL INFORMATION IN ACCORDANCE WITH POPIA	
Purpose of the Processing of Personal Information	Type of Processing
EXTERNAL PARTIES TO SBV	
1.To provide services to the Customer in accordance with terms agreed to by the Customer	Collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
2. To undertake activities related to the provision of services and transactions to Customers including:	
2.1 to fulfil domestic legal, regulatory and compliance requirements and comply with any applicable agreements applicable to the Company	
2.2 to verify the identity of Customer representatives who contact the Company or may be contacted by the Company	
2.3 for risk assessment, information security management, statistical, trend analysis and planning purposes	
2.4 to monitor and record calls and electronic communications with the Customer for quality, training, investigation and fraud prevention purposes;	
2.5 to enforce or defend the Company's rights; and	
2.6 to manage the Company's relationship with the Customer.	
3.The purposes related to any authorised disclosure made in terms of agreement, law or regulation;	
4.Any additional purposes expressly authorised by the Customer; and	
5.Any additional purposes as may be notified to the Customer or Data Subjects in any notice provided by the Company	
INTERNAL PARTIES TO SBV	
6. To provide human resources services to employees in accordance with terms agreed and in respect of:	Collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, making available, alignment or, restriction, erasure or destruction.
6.1 Remunerating employees;	
6.2 Admitting employees to SBV's pension fund, provident fund and/or medical aid providers;	
6.3 Conducting criminal, credit, reference, and other related reference checks on employees;	

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PART 2 CATEGORIES OF DATA SUBJECTS AND CATEGORIES OF PERSONAL INFORMATION RELATING THERETO	
Names; contact details; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender; confidential correspondence	Clients: Natural Persons
Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners	Clients – Juristic Persons Entities
Names; contact details; physical and postal addresses; date of birth; Passport Number; Tax related information; nationality; gender; confidential correspondence	Clients – Entities
Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information	Service Providers and Contracted Service Providers
Gender, Marital Status; Colour, Age, Language, Education information; Financial Information; Employment History; ID number; Physical and Postal address; Contact details; Opinions, Criminal behaviour; Union representation; Names; contact details; physical and postal addresses; date of birth; ID number; Tax related information; nationality; gender.	Employees
PART 3 CROSS BORDER TRANSFERS AND RECIPIENTS OF PERSONAL INFORMATION The personal information of data subjects may be processed in Member States of the South African Development Community (SADC) based on the SBV Structure and in accordance with the data privacy laws applicable to the countries inclusive to the SBV Structure . Personal information may be transferred in terms of the SBV Structure as the purpose is necessary for the performance of business activities and tasks carried out in the interest and pursuant to the lawful functions of SBV in representative countries and as the data subject's legitimate interests in the member SADC countries will not be prejudiced by the transfer or the processing	
PART 4 DESCRIPTION OF INFORMATION SECURITY MEASURES The Company undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. The Company may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.	

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

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

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ANNEXURE 6

INTERNAL APPEAL FORM

FORM 4

[Regulation 9]

Reference Number:

PARTICULARS OF PUBLIC BODY				
Name of Public Body				
Name and Surname of Information Officer:				
PARTICULARS OF COMPLAINANT WHO LODGES THE INTERNAL APPEAL				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				
Is the internal appeal lodged on behalf of another person?		Yes	<input type="checkbox"/>	No <input type="checkbox"/>
If answer is "yes", capacity in which an internal appeal on behalf of another person is lodged: <i>(Proof of the capacity in which appeal is lodged, if applicable, must be attached.)</i>				
PARTICULARS OF PERSON ON WHOSE BEHALF THE INTERNAL APPEAL IS LODGED <i>(If lodged by a third party)</i>				
Full Names				
Identity Number				



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Postal Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
E-Mail Address			

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DECISION AGAINST WHICH THE INTERNAL APPEAL IS LODGED <i>(mark the appropriate box with an "X")</i>	
Refusal of request for access	
Decision regarding fees prescribed in terms of section 22 of the Act	
Decision regarding the extension of the period within which the request must be dealt with in terms of section 26(1) of the Act	
Decision in terms of section 29(3) of the Act to refuse access in the form requested by the requester	
Decision to grant request for access	
GROUNDS FOR APPEAL <i>(If the provided space is inadequate, please continue on a separate page and attach it to this form. all the additional pages must be signed)</i>	
State the grounds on which the internal appeal is based:	
State any other information that may be relevant in considering the appeal:	

You will be notified in writing of the decision on your internal appeal. Please indicate your preferred manner of notification:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Appellant/Third party

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FOR OFFICIAL USE OFFICIAL RECORD OF INTERNAL APPEAL

Appeal received by: <i>(state rank, name and surname of Information Officer)</i>				
Date received:				
Appeal accompanied by the reasons for the information officer's decision and, where applicable, the particulars of any third party to whom or which the record relates, submitted by the information officer:				Yes <input type="checkbox"/>
				No <input type="checkbox"/>
OUTCOME OF APPEAL				
Refusal of request for access. Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>	
	No	<input type="checkbox"/>		
Fees (Sec 22). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>	
	No	<input type="checkbox"/>		
Extension (Sec 26(1)). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>	
	No	<input type="checkbox"/>		
Access (Sec 29(3)). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>	
	No	<input type="checkbox"/>		
Request for access granted. Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>	
	No	<input type="checkbox"/>		

Signed at _____ this _____ day of _____ 20 _____

Relevant Authority

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REQUEST TO CORRECT, DELETE OR DESTROY A RECORD

ANNEXURE 7

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 REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.
4. Mark the appropriate box with an "x".

Request for: Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party	
Request for: 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
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Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF DATA RESPONSIBLE PARTY
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
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)

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<p>D</p>	<p>Reasons For *Correction 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.</p> <p>(Please provide detailed reasons for the request)</p>

<p>Signed At _____</p>
<p>On this _____ day of _____</p>
<p>Year _____</p>
<p>Signature _____ of _____ data _____ subject/designated person</p>