

Afrimat Limited and its subsidiaries
(Registration number: 2006/022534/06)

The Manual was prepared in accordance with section 51 of the Promotion of Access to Information Act ('PAIA'), 2000 and compiled to address the requirements of the Protection of Personal Information Act, 2013 ('POPIA').

Afrimat Ltd PAIA Manual

The manual applies to the following legal entities
(hereinafter Afrimat)

Name of subsidiary	Registration number
Afrimat Aggregates (Eastern Cape) (Pty) Ltd	1996/003927/07
Afrimat Aggregates (KZN) (Pty) Ltd	1965/008581/07
Afrimat Aggregates (Operations) (Pty) Ltd	1963/007141/07
Afrimat Aggregates (Trading) (Pty) Ltd	1994/005271/07
Afrimat BEE Trust	IT 13769/06
Afrimat Bulk Commodities (Pty) Ltd	2007/019763/07
Afrimat Concrete Products (Pty) Ltd	1983/007664/07
Afrimat Contracting International (Pty) Ltd	2002/025895/07
Afrimat Demaneng (Pty) Ltd	2001/010218/07
Afrimat Empowerment Investments (Pty) Ltd	2008/022498/07
Afrimat Hemp (Pty) Ltd	1998/013868/07
Afrimat Lime Company (Pty) Ltd	1998/011330/07
Afrimat Logistics (Pty) Ltd	1994/008987/07
Afrimat Manganese (Pty) Ltd	1937/009895/07
Afrimat Readymix (Cape) (Pty) Ltd	1983/000088/07
Afrimat Readymix (Inland) (Pty) Ltd	1979/006794/07
Afrimat Share Incentive Trust	IT 13766/06
Afrimat Shared Services (Pty) Ltd	2007/009431/07
Benicon Coal (Pty) Ltd	1993/003007/07
Boublok (Pty) Ltd	1981/009858/07
Capmat (Pty) Ltd	1999/027491/07
Cape Lime (Pty) Ltd	1999/002171/07
Clinker Supplies (Pty) Ltd	1990/007640/07
Community Quarries (Pty) Ltd	1994/002037/07
Afrimat Silica (Pty) Ltd	2011/102732/07
Delf Sand (Pty) Ltd	2011/102732/07
Delf Silica Coastal (Pty) Ltd	1998/018044/07
Grand Mix Trading (Pty) Ltd	2011/102436/07
Glen Douglas Dolomite (Pty) Ltd	2012/001056/07
Ikapa Quarries (Pty) Ltd	1934/005306/07
Infrasors Holdings (Pty) Ltd	1998/021710/07

Afrimat Ltd PAIA Manual

Infrasors Empowerment Trust	IT 7305/07
Infrasors Environmental Rehabilitation Trust	IT 3148/99
Infrasors Management Services (Pty) Ltd	1999/004612/07
K2011/147837/07 (Pty) Ltd	2011/147837/07
Labonte 3 (Pty) Ltd	2006/034100/07
Lyttelton Dolomite (Pty) Ltd	1998/005918/07
Maritzburgh Quarries (Pty) Ltd	1984/002824/07
Meepo Ya Mmu Resources (Pty) Ltd	2008/013488/07
Mercator Commodities (Pty) Ltd	2017/367349/07
Nkomati Anthracite (Pty) Ltd	1980/008581/07
Olympic Sand (Pty) Ltd	2002/019500/07
Phakamani Academy (Pty) Ltd	1972/013771/07
Pienaarspoort Ontwikkeling (Pty) Ltd	1993/004118/07
Rodag Holdings (Pty) Ltd	1961/001037/07
Afrimat Management Services (Pty) Ltd	2005/011659/07
S A Block (Pty) Ltd	1966/002954/07
Scottburgh Quarry (Pty) Ltd	2007/018742/07
Sunshine Crushers (Pty) Ltd	1987/004625/07

1. Contact particulars

Head of business:	Andries van Heerden	Information officer:	Andries Johannes van Heerden
		Deputy information officer:	Pieter Gabriël Stephanus De Wit
Postal address:	P O Box 5278	Physical address:	Tyger Valley Office Park No. 2
	Tygervalley		Cnr Willie van Schoor & Old Oak Rd
	Bellville		Bellville
	7536		7530
Telephone number:	021 917 8840		
E-mail address:	popia@afrimat.co.za		
Website:	www.afrimat.co.za		

2. About Afrimat Limited

Afrimat Limited is a leading black empowered open pit mining company supplying construction materials, industrial minerals and bulk commodities. Listed in the 'Construction & Materials' sector of the Main Board JSE Limited it operates through three key divisions: Construction Materials, Industrial Minerals, and Bulk Commodities.

3. Introduction

- 3.1 The Promotion of Access to Information Act, No.2 for 2000 ("the Act") was enacted on 3 February 2000, giving effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or/and protection of any rights.
- 3.2 In terms of section 51 of the Act, all Private Bodies are required to compile an Information Manual ("PAIA Manual").
- 3.3 Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, except where the Act expressly provides that the information may or must not be released. The Act sets out the requisite procedural issues to such request.

4. Definitions

- 4.1 **Conditions for Lawful Processing** means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA;
- 4.2 **Consent** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
- 4.3 **Constitution** means the Constitution of the Republic of South Africa, 1996;
- 4.4 **Data Subject** is the natural or juristic person to whom the personal information relates;
- 4.5 **Manual** means this manual prepared in accordance with section 51 of PAIA and regulation 4(1)(c) of the POPIA Regulations;
- 4.6 **Personal Information** has the meaning ascribed thereto in section 1 of POPIA;

- 4.7 **Private Body** means the entity to which this manual applies as it appears on the front page of this manual;
- 4.8 **Processing** has the meaning ascribed thereto in section 1 of POPIA;
- 4.9 **Responsible Party** is the entity (in this case AFRIMAT) that needs the personal information for a particular reason and determines the purpose of and means for processing the personal information;
- 4.10 **Record** has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;

5. Guide in terms of section 10 of The Act

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

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

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:

Postal Address: Private Bag 2700, Houghton, 2041
Telephone Number: +27 11 877 3600
Fax Number: +27 11 403 0625
Website: www.sahrc.org.za

6. Facilitation of a request for access to information

Information which is not readily available as indicated in this manual, may be requested in accordance with the procedure prescribed in terms of the Act. Copies of the prescribed forms to be completed for submitting a request, are available from Afrimat Limited and its subsidiaries.

7. Information available in terms of other legislation

Information is available in terms of certain provisions of the following legislation:

- 7.1 Arbitration Act 42 of 1965
- 7.2 Basic Conditions of Employment Act 75 of 1997
- 7.3 BBBEE Act 53 of 2003
- 7.4 Companies Act 71 of 2008
- 7.5 Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- 7.6 Competition Act 89 of 1998
- 7.7 Constitution of the Republic of South Africa, 2008
- 7.8 Consumer Protection Act 68 of 2008
- 7.9 Criminal Procedures Act 51 of 1977
- 7.10 Currency and Exchanges Act 9 of 1933
- 7.11 Customs and Excise Act 91 of 1964
- 7.12 Deeds Registries Act 47 of 1937
- 7.13 Disaster Management Act 57 of 2002
- 7.14 Electronic Communications and Transactions Act 25 of 2002
- 7.15 Employment Equity Act 55 of 1998

- 7.16 Expropriation Act 63 of 1975
- 7.17 Financial Intelligence Centre Act 38 of 2001
- 7.18 Financial Services Board Act 97 of 1990
- 7.19 Income Tax Act 58 of 1962
- 7.20 Insolvency Act 24 of 1936
- 7.21 Intellectual Property Laws Amendment Act 38 of 1997
- 7.22 Labour Relations Act 66 of 1995
- 7.23 Mine Health and Safety Act 29 of 1996
- 7.24 National Credit Act 34 of 2005
- 7.25 National Environmental Management Act 107 of 1998
- 7.26 Occupational Health and Safety Act 85 of 1993
- 7.27 Preferential Procurement Policy Framework Act 5 of 2000
- 7.28 Prescription Act 68 of 1969
- 7.29 Prevention of Combating of Corrupt Activities Act 12 of 2004
- 7.30 Prevention of Organised Crime Act 121 of 1998
- 7.31 Protected Disclosures Act 26 of 2000
- 7.32 Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
- 7.33 Protection of Information Act 84 of 1982
- 7.34 Promotion of Access to Information Act 2 of 2000
- 7.35 Promotion of Administrative Justice Act 3 of 2000
- 7.36 Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- 7.37 Protection of Businesses Act 99 of 1978
- 7.38 Securities Transfer Tax Act 25 of 2007
- 7.39 South African Reserve Bank Act 90 of 1989
- 7.40 South African Revenue Services Act 34 of 1997
- 7.41 Skills Development Levies Act 9 of 1999
- 7.42 Skills Development Act 97 of 1998
- 7.43 Statistics Act 6 of 1999
- 7.44 Trade Marks Act 194 of 1993
- 7.45 Transfer Duty Act 40 of 1949
- 7.46 Trust Property Control Act 57 of 1988
- 7.47 Unemployment Contributions Act 4 of 2002
- 7.48 Unemployment Insurance Act 63 of 2001
- 7.49 Value Added Tax Act 89 of 1991
- 7.50 JSE rules
- 7.51 Reserve Bank regulations
- 7.52 Mineral and Petroleum Resources and Development Act 28 of 2002
- 7.53 Mineral and Petroleum Resources Royalty Act 28 of 2002
- 7.54 National Heritage Resources Act 25 of 1999
- 7.55 National Water Act 36 of 1998
- 7.56 Explosives Act 15 of 2003
- 7.57 Mining Charter

Although Afrimat has used their best endeavors to provide a list of applicable legislation, it is possible that the list may be incomplete. Should it come to Afrimat's attention that other or new legislation is also applicable, the list will be updated as such.

8. Information automatically available

The following categories of records are automatically available for inspection, purchase or photocopying:

- 8.1 Newsletters
- 8.2 Pamphlets / Brochures
- 8.3 Posters
- 8.4 Pricelists
- 8.5 Reports
- 8.6 Marketing and promotional material
- 8.7 www.afrimat.co.za

9. Information available in terms of The Act

The subjects on which the business holds records and the categories on each subject are as listed below. Please note that a requestor is not automatically allowed access to these records and that access to them may or must be refused in accordance with section 62 to 69 of The Act.

9.1 Accounting records

- 9.1.1 Annual financial statements and working papers
- 9.1.2 General ledger
- 9.1.3 Subsidiary ledgers (receivables, payables, etc.)
- 9.1.4 Bank statements, payment-related records
- 9.1.5 Customer and supplier statements and invoices
- 9.1.6 Deposit slips
- 9.1.7 Cash books and petty cash books
- 9.1.8 Fixed asset register
- 9.1.9 Tax returns and assessments
- 9.1.10 VAT returns
- 9.1.11 Lease or instalment sale agreements
- 9.1.12 Budgets and business plans
- 9.1.13 Insurance records
- 9.1.14 Investment records
- 9.1.15 Auditor's reports
- 9.1.16 Internal auditors' reports
- 9.1.17 Inventory records (including stock take)
- 9.1.18 Systems documentation
- 9.1.19 Management reviews
- 9.1.20 Capital expenditure
- 9.1.21 Credit agreements
- 9.1.22 Record of assets
- 9.1.23 Record of liabilities
- 9.1.24 Record of loans to related parties
- 9.1.25 Record of liabilities and obligations
- 9.1.26 Record of property held
- 9.1.27 Record of revenue
- 9.1.28 Record of expenses

9.2 Auditors

9.2.1 Correspondence

9.3 Credit Agreements

- 9.3.1 Debt counsellor's documents
- 9.3.2 Credit Provider's documents
- 9.3.3 Credit Bureaux' documents
- 9.3.4 Enquiries
- 9.3.5 Details and results of disputes lodged with consumers
- 9.3.6 Payment profile
- 9.3.7 Adverse information
- 9.3.8 Debt restructuring
- 9.3.9 Civil court judgements
- 9.3.10 Administration orders
- 9.3.11 Sequestrations
- 9.3.12 Liquidations
- 9.3.13 Rehabilitation orders

9.4 Distribution and Transportation

- 9.4.1 Permits and licenses
- 9.4.2 Transportation system delivery plan and routing
- 9.4.3 Transportation rights

9.5 Fixed Property

- 9.5.1 Leases
- 9.5.2 Mortgage bonds or other encumbrances
- 9.5.3 Title deeds

9.6 Health and Safety

- 9.6.1 Health and safety committee's records of each recommendation affecting the health of employees and reports made to the inspector
- 9.6.2 Details of air emission discharges
- 9.6.3 Details of solid waste discharges
- 9.6.4 Emergency response plans
- 9.6.5 Employee medical surveillance records in respect of hazardous chemicals and substances
- 9.6.6 Employee public health emergency action plans
- 9.6.7 Environmental impact assessments
- 9.6.8 Environmental management programs and systems
- 9.6.9 Industrial hygiene programs, data and audits
- 9.6.10 Medical surveillance records related to hazardous chemical substance
- 9.6.11 Medical surveillance records related to noise induced hearing loss (including baseline audiogram of all employees)
- 9.6.12 Permits, licenses, approvals and registrations for operations of sites and business
- 9.6.13 Records of assessment and air monitoring for hazardous chemical substance
- 9.6.14 Records of assessment and noise monitoring for noise monitoring and noise induced hearing loss
- 9.6.15 Records of incident reported at work

- 9.6.16 Records of investigations and tests in respect of hazardous chemicals and substances
 - 9.6.17 Records of waste water discharges
 - 9.6.18 Records of waste water storage and disposal
 - 9.6.19 Waste water assessment and monitoring records
 - 9.6.20 Records of medical surveillance, working hours and remuneration in respect of mine employees
 - 9.6.21 Safety management systems, data and audits
 - 9.6.22 Water quality monitoring programme records
- 9.7 Information Technology Policies and Procedures**
- 9.7.1 Agreements
 - 9.7.2 Audits
 - 9.7.3 Capacity and utilisation of current systems
 - 9.7.4 Client database
 - 9.7.5 Development or investment plans
 - 9.7.6 Disaster recovery processes and procedures
 - 9.7.7 Hardware
 - 9.7.8 Internet
 - 9.7.9 Intranet
 - 9.7.10 Licenses
 - 9.7.11 Systems support, programming and development
 - 9.7.12 LAN Installations
 - 9.7.13 Operating systems
 - 9.7.14 Software packages
 - 9.7.15 Telephone exchange equipment
 - 9.7.16 Telephone lines, leased lines and data lines
- 9.8 Insurance**
- 9.8.1 Claim records
 - 9.8.2 Details of coverage, limits and insurers
 - 9.8.3 Insurance policies
- 9.9 Intellectual Property**
- 9.9.1 Agreements relating to intellectual property, e.g. license agreements, secrecy agreements, research and development agreements, use agreements, joint venture agreements and joint development agreements.
 - 9.9.2 Designs, trademarks, trade names and protected names
- 9.10 Legal, Agreements and Contracts**
- 9.10.1 Acquisition or disposal documentation
 - 9.10.2 Agreements with contractors, suppliers and clients
 - 9.10.3 Agreements with customers
 - 9.10.4 Agreements with governmental agencies
 - 9.10.5 Agreements with shareholders, officers or directors
 - 9.10.6 Complaints, pleadings, briefs and other documents pertaining to actual, pending or threatened litigation, arbitration or investigation
 - 9.10.7 Distributor, dealer or agency agreements
 - 9.10.8 Joint venture agreements, partnership agreements, participation, franchise, co-marketing, co-promotion or other alliance agreements

- 9.10.9 Material agreements relating to provision of services or materials
- 9.10.10 Material licenses, permits and authorisations
- 9.10.11 Contracts, including lease agreements and finance agreements
- 9.10.12 Restraint agreements
- 9.10.13 Sale agreements
- 9.10.14 Settlement agreements
- 9.10.15 Warranty agreements
- 9.10.16 Electronic communications - Personal information and the purpose for which the data was collected
- 9.10.17 Electronic communications - Record of any third party to whom the information was disclosed
- 9.10.18 Electronic communications - All personal data which has become obsolete
- 9.10.19 Consumer Protection Act - disclosure by intermediary: information provided to a consumer
- 9.10.20 Consumer Protection Act - disclosure by intermediary: conflict of interest
- 9.10.21 Consumer Protection Act - disclosure by intermediary: record of advice and basis on which it was given
- 9.10.22 Consumer Protection Act - disclosure by intermediary: written instructions to consumer
- 9.10.23 Consumer Protection Act - disclosure by promotional competitions: full details, rules, etc.
- 9.10.24 Consumer Protection Act - disclosure by auctions: written agreement containing terms and conditions
- 9.10.25 Correspondence with Legal Advisors
- 9.10.26 Personnel Records
- 9.10.27 Arbitration awards
- 9.10.28 Attendance register
- 9.10.29 Collective agreements
- 9.10.30 Biometric records
- 9.10.31 Criminal record checks
- 9.10.32 Disability schemes
- 9.10.33 Disciplinary records
- 9.10.34 Employee evaluation and performance records
- 9.10.35 Employee information records
- 9.10.36 Employee loans
- 9.10.37 Employee remuneration
- 9.10.38 Employment applications
- 9.10.39 Employee date of birth
- 9.10.40 Employment contracts
- 9.10.41 Employment equity plan
- 9.10.42 Expense accounts
- 9.10.43 Funeral insurance scheme
- 9.10.44 Group life
- 9.10.45 Health and safety records
- 9.10.46 Incentive schemes
- 9.10.47 Industrial training records
- 9.10.48 IRP 5 and IT 3 certificates
- 9.10.49 Letters of appointment
- 9.10.50 Leave applications
- 9.10.51 Maternity leave policy

- 9.10.52 Medical aid records
- 9.10.53 Name and occupation of each employee
- 9.10.54 Organisational design
- 9.10.55 Payroll
- 9.10.56 Particulars of each employee
- 9.10.57 Pension fund information
- 9.10.58 Personnel file
- 9.10.59 Policies and procedures
- 9.10.60 Provident fund information
- 9.10.61 Records of strikes, lockouts or protest action
- 9.10.62 Recruitment and appointments
- 9.10.63 Relocation policy
- 9.10.64 Registered trade unions / employers' organisations documents, list of members
- 9.10.65 Salary and wage registers
- 9.10.66 Salary slips and wage records
- 9.10.67 Scholarships and bursaries
- 9.10.68 Staff records after employment
- 9.10.69 Study assistance schemes
- 9.10.70 Time records
- 9.10.71 Training and development
- 9.10.72 UIF, PAYE and SDL returns
- 9.10.73 Workmen's Compensation documents

9.11 Sales and Marketing

- 9.11.1 Brochures, newsletters and marketing material
- 9.11.2 Customers
- 9.11.3 Domestic and export orders
- 9.11.4 Media releases
- 9.11.5 Products
- 9.11.6 Public relations policies and procedures
- 9.11.7 Sales
- 9.11.8 Service and product information

9.12 Statutory Company Records

- 9.12.1 Annual Statutory Returns
- 9.12.2 Certificate of Change of Name
- 9.12.3 Certificate of Incorporation
- 9.12.4 Certificate to Commence Business
- 9.12.5 Dividend register
- 9.12.6 Directors' attendance register
- 9.12.7 Index of Members
- 9.12.8 Memorandum and Articles of Association
- 9.12.9 Memorandum of Incorporation and alterations / amendments
- 9.12.10 Notice and minutes of shareholders' meetings
- 9.12.11 Minutes of directors' meetings
- 9.12.12 Minutes of audit committee meetings
- 9.12.13 Minutes of directors' committee meetings
- 9.12.14 Other minute books
- 9.12.15 Proxy documents
- 9.12.16 Proxy forms used at Court convened meetings

- 9.12.17 Register of Allotments
- 9.12.18 Register of company secretary and auditors
- 9.12.19 Register of directors and officers
- 9.12.20 Register of directors' shareholding
- 9.12.21 Register of past directors
- 9.12.22 Registration Certificate
- 9.12.23 Register of beneficial interest holders
- 9.12.24 Reports presented at Annual General Meeting
- 9.12.25 General resolutions
- 9.12.26 Special resolutions
- 9.12.27 Resolutions
- 9.12.28 Rules
- 9.12.29 Shareholders' agreements
- 9.12.30 Shareholders' register
- 9.12.31 Securities register / uncertificated securities register
- 9.12.32 Written communication to holders of securities

9.13 Tax

- 9.13.1 Income tax and VAT returns
- 9.13.2 Provisional tax returns
- 9.13.3 Tax assessments
- 9.13.4 Documents relating to where the objection and appeal is lodged
- 9.13.5 Records relating to taxable gain or assessed capital loss
- 9.13.6 VAT documents
- 9.13.7 Records of importation goods and documents
- 9.13.8 Vendors information
- 9.13.9 Documentary proof substantiating the zero rating of supplies
- 9.13.10 Returns of dividend declared
- 9.13.11 Returns of security transfer tax

10. Requesting procedures

A person who wants access to the records must complete the necessary request form that is available at the offices of Afrimat Limited and its subsidiaries (attached in Annexure A), or can be accessed on www.sahrc.org.za. The completed request form must be sent to the address or email address, as provided in this manual, and marked for the attention of the Information Officer.

11. Availability of the Manual

Copies of this manual are available for inspection, free of charge, at the offices of Afrimat Limited and its subsidiaries, from the South African Human Rights Commission and at www.afrimat.co.za.

12. Grounds for refusal to access records

The Promotion of Access to Information Act provides several grounds on which a request for access to information must be refused. These grounds mainly concern instances where the privacy and interests of other individuals are protected, where such records are already otherwise publicly available, where public interests are not served, the mandatory protection of commercial information of a third party, and the mandatory protection of certain confidential information of a third party. A complete list of the grounds for refusal is available in Chapter 4 of the Act.

13. Protection of Personal Information Act (POPIA)

13.1 Purpose of Processing

In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which personal information is processed by Afrimat will depend on the nature of the personal information and the particular Data Subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.

In general, personal information is processed for purposes of

- Conducting credit reference checks and assessments
- Administration of agreements and third-party relationships
- Providing products and services to customers
- Discounting and asset funding purposes
- Detecting, and prevention of fraud, crime, money laundering and other malpractice
- Employee recruitment and selection processes
- Conducting market or customer satisfaction research
- Marketing and sales
- In connection with legal proceedings
- Staff and payroll administration
- Keeping of accounts and records
- Complying with legal and regulatory requirements
- Historical record keeping, research and recording statistics necessary for fulfilling the company's business objectives.

13.2 Categories of Recipients for Processing the Personal Information

Depending on the nature of the personal information, Afrimat may supply information or records to the following categories of recipients:

Any third party with whom Afrimat has an agreement in place for the following services:

- Capturing and organising of data,
- Storing of data,
- Sending of emails and correspondence to customers,
- Conducting due diligence checks,
- Quality reviews and audits,
- Administration of medical aid,
- Life cover,
- Pension fund, etc
- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- South African Revenue Services, or another similar authority;
- Anyone making a successful application for access in terms of PAIA or POPIA; and

- Subject to the provisions of POPIA and other relevant legislation, Afrimat may share information about a client's creditworthiness with any credit bureau or credit provider's industry association or other association for an industry in which Afrimat operates.

13.3 Actual or Planned Trans-Border Flows of Personal Information

Personal Information may be transmitted trans-border to the company's members, suppliers and/or funders in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws which are similar to those of South Africa. The company will endeavour to ensure that its suppliers, funders and members will make all reasonable efforts to secure said data and Personal Information in which case it will fully comply with applicable data protection legislation. Current employees and consultants' information may also be transferred transborder where the company may be providing services or performing in terms of its contractual obligations.

13.4 Data Retention

- We may retain and Process some or all of your Personal Information if and for as long as:
- We are required or permitted by law or a contract with you to do so;
- It is for lawful purposes that are related to our performance of our functions and activities;
- We reasonably require it for evidentiary purposes; or
- You agree to us retaining it for a specified further period.

To determine the appropriate retention period for Personal Information, Afrimat will consider, among other things, the nature and sensitivity of the Personal Information, the potential risks or harm that may result from its unauthorised use or disclosure, the purposes for which we process it and whether those purposes may be achieved through other means. Afrimat will always comply with applicable legal, regulatory, tax, accounting or other requirements as they pertain to the retention of Personal Information.

13.5 Information Security Measures

Afrimat will ensure the integrity and confidentiality of all Personal Information in its possession, by taking appropriate and practical steps to identify risks relating to information security. Reasonable measures will be taken to establish and maintain appropriate safeguards against such risks.

Afrimat has policies and controls in place for the safe custody, security and backup of information. The safeguarding measures inter alia include:

- Firewalls;
- Virus protection software and update protocols;
- Logical and physical access control (security gate, alarm system, biometric and card access to office building as well as restricted areas);
- Secure setup of hardware and software making up the IT infrastructure;
- Secure communications;
- Investigating and reacting to security incidents;
- Daily back-ups;
- Outsourced Service Providers who process Personal Information on behalf of Afrimat are contracted to implement security controls.

Afrimat will, on an on-going basis, continue to review their security controls and related processes to ensure that the personal information of their Data Subjects remains secure.

13.6 Actual or Planned Transborder Flows of Personal Information

Where applicable, Afrimat will endeavour to ensure that its service providers will make all reasonable efforts to secure the relevant data and Personal Information.

13.7 Employee Contracts and Signed Acknowledgements

Afrimat values the privacy of employee personal information. All current Afrimat employees will be educated and informed of the Employee Privacy Policy and Employee Consent.

As part of the employee take-on process, each new employee will sign the following policies/acknowledgements in addition to their Employment Contract:

- An Employee Privacy Policy and Consent containing the relevant consent clauses for the use and storage of employee information;
- An Acknowledgment of the Afrimat IT policy; as well as
- A Client information confidentiality undertaking.

This is to ensure that all Afrimat employees are aware of their responsibilities in terms of the safeguarding of all personal information within the company. Failure to comply could result in the instigation of disciplinary procedures.

14. Grounds for Refusal

Afrimat may legitimately refuse to grant access to a requested record that falls within a certain category.

Grounds on which Afrimat may refuse access include:

- Protecting personal information that Afrimat holds about a third person (who is a natural person) including a deceased person, from unreasonable disclosure;
- Protecting commercial information that Afrimat holds about a third party or Afrimat (for example a trade secret, financial, commercial, scientific or technical information that may harm the commercial or financial interests of Afrimat or the third party);
- If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- If disclosure of the record would endanger the life or physical safety of an individual;
- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record 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 Afrimat;
- Disclosure of the record would put Afrimat at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- The record is a computer program which is owned by Afrimat and which is protected by copyright and intellectual property laws;
- Research information of Afrimat or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and

- Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

15. Information or Records not found

If the Company cannot find the records that the Requester is looking for despite reasonable and diligent search 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.

16. Prescribed Fees: Section 51 (1) (f) of PAIA

16.1.1 The Act provides for two types of fees, namely:

- A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and is not refundable; and
- An access fee, which is paid by all requesters in the event that 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.

16.1.2 When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (section 54(1)).

16.1.3 The Information Officer shall withhold a record until the Requester has paid the fees as indicated below.

16.1.4 A Requester whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process 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 the request form.

16.1.5 If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the Requester.

16.1.6 Fee structure for Request of Records:

In addition to the request fee, the Minister has also prescribed the following reproduction fees. (Information relating to personal records of the person requesting the information would not be subject to a charge)

Description	Amount
For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on <ul style="list-style-type: none"> • Stiffy disc • Compact disc 	R7.50 R70.00
For a transcription of visual images, for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record, for an A4-size page or part thereof	R20.00
For a copy of an audio record	R30.00

Request Fees:

Where a Requester submits a request for access to information held by a private body on a person other than the Requester himself/herself, a request in the amount of R 50.00 is payable up-front before the Company will further process the request.

Access Fees:

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specifically excluded in terms of the PAIA Act or an exclusion is determined by the Minister in terms of section 54(8). The applicable access fees which will be payable are:

Description	Amount
For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on <ul style="list-style-type: none">• Stiffy disc• Compact disc	R7.50 R70.00
For a transcription of visual images, for an A4-size page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record, for an A4-size page or part thereof	R20.00
For a copy of an audio record	R30.00
To search for and prepare the record for disclosure, for each hour or part of an hour reasonably required for such search and preparation	R30.00

Note: The actual postage is payable when a copy of a record must be posted to a Requester.

Deposits:

Where the Company receives a request for access to information other than personal information and the head of Compliance upon receipt of the request is of the opinion that the preparation of the required records for disclosure will take more than 6 (six) hours, a deposit is payable by the Requester. The amount of the deposit is equal to one third of the amount of the applicable access fee.

17. Updates to Manual

This Manual will be updated at such intervals that may be deemed necessary.

END

25 June 2021

Annexure A

FORM C

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. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

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

Full names and surname:
Identity number:
Postal address:
Fax number:
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

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:	Form in which record is required:
Mark the appropriate box with an X.		
NOTES: <ul style="list-style-type: none">a. Compliance with your request in the specified form may depend on the form in which the record is available.b. Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.		

c. (c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.

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	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 copy of record*	printed copy of information	copy in computer readable form* (stiffy or compact disc)
* 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 of21

**SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE**