

ADCORP HOLDINGS LIMITED PROTECTION OF PERSONAL INFORMATION & PROMOTION OF ACCESS TO INFORMATION POLICY

Corporate Portfolio:	Group Risk & Compliance	Policy Owner:	Chief Financial Officer
Policy Title:	Protection of Personal Information & Promotion of Access to Information	Policy Date:	01 November 2022
Policy No:	GRC-POL-06	Next Revision Due:	01 March 2026

Presented by: Charlene Wilson Head: Group Risk and Compliance Adcorp Holdings Limited	
Approved by: Dr John Wentzel Chief Executive Officer Adcorp Holdings Limited	

CONTENTS

ADCORP HOLDINGS LIMITED PROTECTION OF PERSONAL INFORMATION & PROMOTION OF ACCESS TO INFORMATION POLICY.....1

INTRODUCTION3

GROUP STRUCTURE3

COLLECTION OF PERSONAL INFORMATION4

COLLECTION OF EMPLOYEE INFORMATION4

USE OF EMPLOYEE INFORMATION4

COLLECTION OF CLIENT AND/ OR SUPPLIER INFORMATION5

RIGHTS OF DATA SUBJECTS5

USE OF CLIENT AND SUPPLIER INFORMATION6

CROSS-BORDER TRANSFER OF PERSONAL INFORMATION6

DISCLOSURE OF PERSONAL INFORMATION.....6

SAFEGUARDING PERSONAL INFORMATION AND CONSENT6

SECURITY BREACHES7

ACCESS AND CORRECTION OF PERSONAL INFORMATION8

DISPUTE RESOLUTION PROCESS8

storage, RETENTION AND DESTRUCTION OF RECORDS.....9

STANDARDS OF CONDUCT REQUIRED OF EMPLOYEES.....9

INFORMATION REGULATOR'S GUIDE11

RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION12

ACCESS TO RECORDS HELD BY ADCORP GROUP13

OTHER INFORMATION AS MAY BE PRESCRIBED14

AVAILABILITY OF THE POLICY14

FEEES IN RESPECT OF PRIVATE BODIES14

Annexure A – GLOSSARY OF TERMS16

Annexure B – Prescribed Forms.....18

INTRODUCTION

Adcorp Holdings Limited (registration number 1974/001804/06) and all of its affiliates and subsidiaries ("**Adcorp Group**") are obliged to comply with the Protection of Personal Information Act (No. 4 of 2013) ("**POPIA**"), as well as the Promotion of Access to Information Act (No. 2 of 2000) ("**PAIA**"), given that it processes the Personal Information of its employees, candidates, suppliers, clients and other Data Subjects within South Africa from time to time, as well as that there may be requests for information relating to Adcorp Group and its operations. This policy constitutes the manual required in terms of section 51 of PAIA.

Adcorp Group guarantees its commitment to protecting Data Subject privacy, as well as ensuring that their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws, which includes the constitutional provisions of the Republic of South Africa. Adcorp Group also believes in transparency, accountability and access to information about Adcorp Group and this policy details the processes and requirements for any third-party interested in obtaining any information in terms of PAIA. Similar mechanisms and guidelines have been implemented within our Adcorp Australia businesses, in so far as the relevant privacy laws are concerned.

POPIA requires Adcorp Group to inform its Data Subjects as to how their Personal Information is collected, processed, secured, disclosed and destroyed. This policy sets out the manner in which Adcorp Group deals with such Personal Information as well as stipulates the general purpose for which such information is used. It also addresses the standards expected of employees of Adcorp Group in respect of their conduct in this regard.

Where a request is made in terms of PAIA, the body to which the request is made is obliged to give access to the requested information, except where the PAIA expressly provides that the information may or may not be released. This policy specifies the process and manner in which requests for information may be made by third parties and also prescribes the forms to be used when making such requests.

The Information Officer shall ensure that the policy is published on Adcorp Group's website and that the said policy is available at each of its offices for public inspection. The list of records that are voluntarily disclosed and/ or available without a requester having to request access thereto shall be kept and updated monthly and/ or whenever the contents change.

Appropriate stakeholders should be made aware of the contents of this policy when their consent is requested for the Processing of their Personal Information or when there are interactions with Data Subjects.

The provisions of this policy must be read along with the relevant practices and procedures of Adcorp Group, from time to time, that may be used to operationalise the purpose hereof.

GROUP STRUCTURE

Adcorp Group's strategy is underpinned by its aspiration to manage workforce solutions and careers that deliver optimal value for all of its stakeholders.

The constituent brands within Adcorp Group carry on business in the realms of talent acquisition, contingent staffing, business process outsourcing and learning and development within multiple geographies.

COLLECTION OF PERSONAL INFORMATION

Adcorp Group collects stores and processes Personal Information pertaining to Data Subjects including its employees, candidates, suppliers, clients and other stakeholders. The type of information collected and processed will depend on the purpose for which it is collected and will be processed for that scope of application only. Whenever appropriate, Adcorp Group will inform the Data Subject of the information required, the purpose thereof, the rights of the Data Subject in relation to their Personal Information and the other relevant provisions contained at law.

Adcorp Group will indicate to the Data Subject, where possible, the consequence of failing to provide such Personal Information for the purpose for which it is Processed. For example, Adcorp Group may not be able to employ an individual without certain Personal Information relating to that individual or Adcorp Group may not be in a position to render services to a client in the absence of certain information which is required.

COLLECTION OF EMPLOYEE INFORMATION

For the purposes of this policy, "**employees**" include potential, past and existing employees, candidates, assignees and independent contractors of Adcorp Group.

Adcorp Group will, when appointing or engaging with new employees, require information, including, but not limited to Personal Information, from the prospective employee to Process the employee's information on Adcorp Group's system. Such information is reasonably necessary for Adcorp Group's record purposes as well as to ascertain if the prospective employee meets the requirements for the position to which they are applying.

Adcorp Group will use and Process such employee information, as set out below, for purposes including, but not limited to, its employment records and to make lawful decisions in respect of that employee and its business.

USE OF EMPLOYEE INFORMATION

Employees' Personal Information will only be used for the purpose for which it was collected and intended. This would include, but is not limited to:

- submissions to the Department of Employment and Labour;
- submissions to the Receiver of Revenue;
- for audit and recordkeeping purposes;
- in connection with legal proceedings;
- in connection with and to comply with legal and regulatory requirements;
- in connection with any administrative functions of Adcorp Group;
- disciplinary action or any other action to address the employee's conduct or capacity;
- in respect of any employment benefits that the employee is entitled to;
- pre-and post-employment checks and screening;

- any other relevant purpose to which the employee has been notified of; and / or
- any compliance requirements at law.

Should information be Processed for any other reason that is not in the legitimate interests of the employee, Adcorp Group will inform the employee accordingly.

Adcorp Group acknowledges that Personal Information may only be Processed if certain conditions are met which, depending on the merits include:

- the employee consents to the Processing;
- the Processing is necessary to attend to justifiable rights and obligations, for example contractual fulfilment;
- the Processing complies with an obligation imposed by law on Adcorp Group;
- Processing protects a legitimate interest of the employee; and / or
- Processing is necessary for pursuing the legitimate interests of Adcorp Group or of a third party to whom information is supplied.

COLLECTION OF CLIENT AND/ OR SUPPLIER INFORMATION

For purposes of this policy, clients include potential, past and existing clients and suppliers.

Adcorp Group collects and Processes its clients' and / or suppliers' Personal Information, such as that defined in Annexure A to this Policy. The type of information will depend on the need for which it is collected and will be Processed for that purpose only.

Adcorp Group also collects and Processes clients' and / or suppliers' Personal Information for marketing purposes in order to ensure that our products and services remain relevant to our clients and potential clients. All marketing by Adcorp Group is done in strict compliance with POPIA and other relevant laws and regulations.

RIGHTS OF DATA SUBJECTS

Data Subjects have the right:

- to be notified that:
- Personal Information is being collected, or
- Personal Information has been accessed by an unauthorized person;
- to establish whether a responsible party holds Personal Information and to request access;
- to request the correction, Destruction or deletion of Personal Information;
- to object, on reasonable grounds to the Processing of Personal Information;
- to object to the Processing of Personal Information for direct marketing;
- not to have Personal Information processed for purposes of direct marketing by means of unsolicited electronic communications;
- not to be subject to a decision which is based solely on the basis of the automated processing;
- to submit a complaint to the Information Regulator.

USE OF CLIENT AND SUPPLIER INFORMATION

The client's and / or supplier's Personal Information will only be used for the purpose for which it was collected and as agreed, if any such agreement is required at law. This may include, but not be limited to:

- providing products and/ or services;
- in connection with sending accounts and communication in respect of services rendered;
- referral to other service providers;
- confirming, verifying and updating details;
- conducting market or customer satisfaction research;
- for audit and record keeping purposes;
- in connection with legal proceedings; and / or
- in connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

Adcorp Group acknowledges that Personal Information may only be Processed if any of the conditions set out hereunder are met:

- consent obtained for the Processing of Personal Information from the Data Subject;
- Processing is necessary to attend to rights and obligations that are justifiable, including fulfilling contractual provisions;
- Processing complies with an obligation imposed by law;
- Processing protects a legitimate interest of the clients and / suppliers; and / or
- Processing is necessary for pursuing the legitimate interests of Adcorp Group or of a third party to whom information is supplied.

CROSS-BORDER TRANSFER OF PERSONAL INFORMATION

To the extent that Adcorp Group transfers any Personal Information outside the borders of the Republic of South Africa, it shall ensure that the recipient of the Personal Information is subject to applicable laws, binding corporate rules or a binding agreement which provides an adequate level of protection as required by POPIA, or any other applicable privacy laws.

DISCLOSURE OF PERSONAL INFORMATION

Subject to legislative provisions providing the contrary, Adcorp Group may share a Data Subject's Personal Information with third parties, as well as obtain information from such third parties for reasons set out above.

Adcorp Group may also disclose a Data Subject's Personal Information where there is a duty or a right to disclose in terms of applicable legislation, a contractual obligation, or where it may be necessary to protect Adcorp Group's rights.

SAFEGUARDING PERSONAL INFORMATION AND CONSENT

It is a requirement of POPIA to adequately protect the Personal Information Adcorp Group holds and to avoid unauthorized access and use of Personal Information.

Adcorp Group shall review its technical and operational security controls and processes on a regular basis to ensure that Personal Information is secure.

Adcorp Group has appointed an Information Officer who is responsible for the encouragement of compliance with the conditions of the lawful Processing of Personal Information and other provisions of POPIA and PAIA.

Information Officer Details:

Information Officer: Charlene Wilson
Street Address: Adcorp Place, 102 Western Service Road, Gallo Manor Ext 6, 2191
Postal Address: PO Box 70635, Bryanston, 2021
Telephone: +27 10 800 0000
Email Address: compliance@adcorpgroup.com
Website: www.adcorpgroup.com

Each new employee will be required to sign a contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPIA.

Every employee currently engaged with Adcorp Group will be required to sign a document containing relevant consent clauses for the use and storage of Personal Information, or any other action so required, in terms of POPIA, to the extent that they have not already done so.

Adcorp Group's suppliers who fall within the definition of Operators will be required to enter into a written agreement guaranteeing their commitment to the Protection of Personal Information.

Clients and / suppliers shall be responsible for obtaining consent of all Data Subjects to which Personal Information disclosed to Adcorp Group relates.

SECURITY BREACHES

Should Adcorp Group detect a security breach on any of its systems that contain Personal Information, Adcorp Group shall take the required steps to assess the nature and extent of the breach in order to ascertain if any information has been compromised.

Adcorp Group shall activate its Incident Response Plan which includes the notification of the affected parties and the Information Regulator, should it have reason to believe that Personal Information has been compromised. Such notification shall only be made where Adcorp Group can identify the Data Subject to which the information relates. Where it is not possible it may be necessary to consider website publication and whatever else the Information Regulator prescribes.

Notification will be provided in writing by means of:

- email;
- registered mail; and / or
- on our website.

The notification shall provide the following information where possible:

- description of possible consequences of the breach;
- measures taken to address the breach;
- recommendations to be taken by the Data Subject to mitigate adverse effects; and / or
- the identity of the party responsible for the breach.

In addition to the above, Adcorp Group shall notify the Information Regulator of any breach and/or compromise to Personal Information in its possession and work closely with and comply with any recommendations issued by the Information Regulator.

The following provisions will apply in this regard:

- the Information Officer will be responsible for overseeing the investigation;
- the Information Officer will be responsible for reporting to the Information Regulator promptly following a breach/ compromise to Personal Information;
- the Information Officer will be responsible for reporting to the Data Subject(s) within 2 working days of a breach/ compromise to Personal Information; and / or
- the timeframes above are guidelines and depending on the merits of the situation may require earlier or later reporting.

ACCESS AND CORRECTION OF PERSONAL INFORMATION

Data Subjects have the right to request access to any Personal Information that Adcorp Group holds about them.

Data Subjects have the right to request Adcorp Group to update, correct or delete their Personal Information on reasonable grounds. Such requests must be made to Adcorp Group's Information Officer (see details above).

Where an employee or client (Data Subject) objects to the Processing of their Personal Information, Adcorp Group may no longer Process said Personal Information. The consequences of the failure to give consent to Process the Personal Information must be set out before the employee or client and / or supplier confirms their objection.

The Data Subject must provide reasons for the objection to the Processing of his/her Personal Information.

DISPUTE RESOLUTION PROCESS

POPIA provides a framework for individuals to protect their privacy rights and seek recourse in the event of unlawful processing of Personal Information.

The following dispute resolution process can be utilized:

- Internal resolution;
- Lodge a complaint with the Information Regulator;
- Mediation; and
- Legal action.

Should a Data Subject believe there is a dispute in relation to their Personal Information, they are requested to address their complaint in writing to the Information Officer of Adcorp Group. Within 7 (seven) working days of receipt of the complaint, the Information Officer shall engage with the affected Data Subject to ascertain any further details required by the Information Officer in order to investigate the dispute internally and engage with any internal parties within Adcorp Group who may be relevant to the complaint. The Parties will thereafter hold a without prejudice meeting within 20 (twenty) days of the complaint being received or such other date the parties agree to. If the dispute cannot be resolved by way of the aforementioned internal resolution mechanism, the parties may elect to follow an alternative dispute resolution mechanism.

STORAGE, RETENTION AND DESTRUCTION OF RECORDS

Adcorp Group is obligated to retain certain information as prescribed by law. This includes but is not limited to the following:

- All Personal Information which is provided to the Adcorp Group will be held and / or stored securely for the purpose for which it was collected. Personal Information may be stored either in hard-copy or electronically in a centralised and secured data base and audited regularly to ensure the safety and security of the Personal Information.
- To the extent that Adcorp Group transfers any Personal Information outside the borders of the Republic of South Africa, it shall ensure that the recipient of the Personal Information is subject to laws, binding corporate rules or a binding agreement which provides an adequate level of protection as required by POPIA, or any other applicable law.
- Once this information is no longer required due to the fact that the purpose for which the Personal Information was held has expired, such Personal Information will be safely and securely archived for a period of 7 years, as per the requirements of the Companies Act, 71 of 2008 or longer should this be required by any other law applicable in South Africa. Thereafter, all your Personal Information will be permanently destroyed.

Refer to Adcorp Group Data Retention and Destruction Policy

AMENDMENTS TO THIS POLICY

Amendments to this policy will take place from time to time subject to the discretion of Adcorp Group and pursuant to any changes in the law.

STANDARDS OF CONDUCT REQUIRED OF EMPLOYEES

In addition to the provisions contained within this POPIA policy, their contract, the disciplinary code, and any other applicable Adcorp Group policy, the following standards of conduct and practice and their accompanying underlying principles must be complied with at all times and a breach thereof may result in serious action being taken which includes termination of relationship or a dismissal for a first offence.

Accountability

The employee must ensure that the conditions for Processing Personal Information and all the measures that give effect to such conditions are complied with at the time of the determination of the purpose and means of the Processing and during the Processing itself.

Processing Limitation

Personal Information must be Processed:

- lawfully; and
- in a reasonable manner that does not infringe the privacy of the Data Subject.

This includes considerations of minimality and adequacy, given the purpose for which it is Processed, as well as whether it is adequate, relevant and not excessive.

Personal Information may only be Processed if:

- the Data Subject or a competent person (where the Data Subject is a child) consents to the Processing;
- the purpose is to carry out actions for the conclusion or performance of a contract;
- Processing complies with an obligation imposed by law on the responsible party;
- Processing protects a legitimate interest of the Data Subject;
- Processing is necessary for the proper performance of a public law duty by a public body;
- Processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied; or/ and

Collection must be directly from the Data Subject, except as otherwise provided for unless the information is contained in or derived from a public record or has deliberately been made public by the Data Subject.

Purpose Specification

Personal Information is collected for a specific, explicitly defined, and lawful purpose related to a function or activity of the responsible party.

Further Processing Limitation

Further Processing of Personal Information must be compatible with the purpose for which it was collected and furthermore:

- the consequences of the intended further Processing for the Data Subject;
- the manner in which the Personal Information has been collected; and
- any contractual rights and obligations between the parties.

Personal Information may only be further Processed if:

- the Data Subject has consented;
- the further processing is necessary for the performance of a contract;
- Compatibility with original purpose for which it was processed
- the information is available in a public record or has been made deliberately public by the Data Subject;
- the further processing is in compliance with legal obligations.
- further processing is necessary for protecting legitimate interests.
- Necessary for research, statistical and historical purposes

- Transfer to third parties required to achieve the purpose for which the Personal Information is processed.
- In the event that Adcorp further processes your personal information, it will be in accordance with this Policy and POPIA.

Security Safeguards

Employees must secure the integrity and confidentiality of Personal Information in their possession or under their control by taking appropriate, reasonable technical and organizational measures to prevent:

- loss of, damage to or unauthorized Destruction of Personal Information; and
- unlawful access to or Processing of Personal Information.

Employees must take reasonable measures to:

- identify all reasonably foreseeable internal and external risks to Personal Information in its possession or under their control;
- establish and maintain appropriate safeguards against the risks identified;
- regularly verify that the safeguards are effectively implemented; and
- ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

Employees must have due regard to generally accepted information security practices and procedures which includes, but is not limited to, the use of unique and strong passwords and ensuring that devices are kept in a safe environment.

Employee training and awareness

Employees must attend internal awareness sessions that will be conducted on an ongoing basis regarding the provisions of POPIA and PAIA, regulations made in terms of POPIA and PAIA, codes of conduct or information obtained from the Information Regulator.

INFORMATION REGULATOR'S GUIDE

This Guide is available from the Information Regulator.

Please direct any queries to:

The Information Regulator

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

Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2001

Website: www.inforegulator.org.za

E-mail: General Enquiries - enquiries@inforegulator.org.za

PAIA Complaints – PAIAComplaints@inforegulator.org.za

POPIA Complaints - POPIAComplaints@inforegulator.org.za

RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

The following legislation provides for the availability of certain records [s 51(1)(b)(iii)]:

- Basic Conditions of Employment Act, 1997 (Act No. 75 of 1997)
- Broad-Based Black Economic Empowerment Act, 2003 (Act No. 53 of 2003)
- Companies Act 2008 (Act No. 71 of 2008)
- Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)
- Employment Equity Act, 1998 (Act No. 55 of 1998)
- Income Tax Act, 1962 (Act No. 58 of 1962)
- King Code of Governance for South Africa, 2009 (King IV)
- Labour Relations Act, 1995 (Act No. 66 of 1995)
- Regulation of Interception of Communications and Provision of Communication-Related Information Act, 2002 (Act No. 70 of 2002)
- Skills Development Act, 1998 (Act No. 97 of 1988)
- Skills Development Levies Act, 1999 (Act No. 9 of 1999)
- Value-Added Tax Act, 1991 (Act No. 89 of 1991)
- International Financial Reporting Standards
- Compensation for Occupational Injuries and Diseases Act, 1993 (Act No. 130 of 1993)
- Competition Act 1998 (Act No. 89 of 1998)
- Copyright Act 98 of 1978
- Currency and Exchange Act, 1933 (Act No 9 of 1933)
- Financial Advisory and Intermediary Services Act, 2002 (Act No 37 of 2002)
- General and Further Education and Training Quality Assurance Act, 2001 (Act No. 58 of 2001)
- Protected Disclosure Act, 2000 (Act No. 26 of 2000)
- Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)
- Occupational Health and Safety Act, 1993 (Act No 85, of 1993)
- Immigration Act, 2002 (Act No. 13 of 2002)
- National Credit Act, 2005 (Act No. 34 of 2005)
- Unemployment Insurance Act, 2001 (Act No. 63 of 2001)
- Unemployment Insurance Contributions Act, 2002 (Act No. 4 of 2002)
- Prevention and Combating of Corrupt Activities Act, 2004 (Act No. 12 of 2004)
- Prevention of Organised Crime Act 121 of 1998 (POCA)
- Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act No. 4 of 2000)
- National Water Act, 1998 (Act No. 36 of 1998)
- National Road Traffic Act, 1996 (Act No 93 of 1996)
- Arbitration Act, 42 of 1965
- Constitution of The Republic of South Africa Act 108 of 1996
- Consumer Protection Act 68 of 2008 (CPA)
- Protection of Personal Information Act 4 of 2013 (POPIA)
- Close Corporations Act, 1984 (Act No. 69 of 1984)
- Insolvency Act, 1936 (Act No. 24 of 1936)
- Cyber Crimes Act, 2020 (Act No. 19 of 2020)

ACCESS TO RECORDS HELD BY ADCORP GROUP

Automatic Disclosures, i.e. Information that is freely available [s 51(1)(b)(ii)]

- Adcorp Holdings Limited Integrated Annual Report
- Trading Statements
- Website Information – www.adcorp.co.za

Information that may be requested [s 51(1)(b)(iv)]:

Please note that recording a category or subject matter in this policy does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis, in accordance with the provisions of POPIA:

Human Resources

- Policies on employee recruitment and other employee-related Policies
- Employment Contracts
- Details of employees and benefits

Procurement

- Procurement Policies

Company Secretarial

- Company Registrations
- Company Documentation relating to Directors' appointments
- Statutory Documentation
- Company Share Registers
- Minutes and Resolutions

Financial

- Financial Statements
- Tax Records

Governance, Risk and Compliance

- B-BBEE Certificates

The Request Procedures [s 53]

- A requestor must use the prescribed form to make the request for access to information. The request must be made to the Adcorp Group Information Officer. This request must be made to the address or electronic mail address.
- The Requestor must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requestor. The Requestor should also indicate which form of access is required. The Requestor should also indicate if any other manner is to be used to inform the Requestor and state the necessary particulars to be so informed.
- The Requestor must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

- If a request is made on behalf of another person, the Requestor must then submit proof of the capacity in which the Requestor is making the request to the satisfaction of the head of the private body.

Fees [s 54]

A Requestor who seeks access to a record containing Personal Information about that Requestor is not required to pay the Request Fee. Every other Requestor, who is not a personal Requestor, must pay the required Request Fee:

- The Information Officer must notify the Requestor (other than a personal Requestor) by notice, requiring the Requestor to pay the prescribed fee (if any) before further Processing the request.
- The fee that the Requestor must pay to a private body is R50. The Requestor may lodge an application to the court against the tender or payment of the request fee.
- After the Information Officer has made a decision on the request, the Requestor must be notified on the required form.
- If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

OTHER INFORMATION AS MAY BE PRESCRIBED

The Minister of Justice and Constitutional Development has not made any Regulations in this regard [s 51(1)(a)(ii)].

AVAILABILITY OF THE POLICY

This policy is available for inspection at Adcorp Place, 102 Western Service Road, Gallo Manor, Woodmead, and a copy is available on our website (www.adcorp.co.za). Alternatively, a copy is available at the Information Regulator. In respect of hard copies, any transmission costs/postage will be for the account of the Requestor [s 51(3)].

FEES IN RESPECT OF PRIVATE BODIES

- The fee for a copy of the policy as contemplated in regulation 9(2)(c) is R2.00 for every photocopy of an A4-size page or part thereof.
- The fees for reproduction referred to in regulation 11(1) are as follows:

	Rands
For every photocopy of an A4-size page or part thereof	2,00
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	2,00
For a copy in a computer-readable form on a flash drive	40,00
<ul style="list-style-type: none"> ▪ For a transcription of visual images for an A4 size page or part thereof ▪ For a copy of visual images 	Services to be outsourced. Will depend on quotation from service provider.
<ul style="list-style-type: none"> ▪ For a transcription of an audio record for an A4 size page or part thereof ▪ For a copy of an audio record 	24,00 40,00

- The Request Fee payable by a Requestor, other than a personal Requestor, referred to in Regulation 11(2) is R140,00.
- The access fees payable by a Requestor referred to in Regulation 11(3) are as follows:

	Rands
For every photocopy of an A4-size page or part thereof	2,00
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	2,00
For a copy in a computer-readable form on a flash drive	40,00
<ul style="list-style-type: none"> ▪ For a transcription of visual images for an A4 size page or part thereof ▪ For a copy of visual images 	Services to be outsourced. Will depend on quotation from service provider
<ul style="list-style-type: none"> ▪ For a transcription of an audio record for an A4 size page or part thereof ▪ For a copy of an audio record 	24,00 40,00
To search for and prepare the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	145,00
To not exceed a total cost of R435,00	435,00

- For purposes of section 54(2) of the Act, the following applies:
 - Six hours as the hours to be exceeded before a deposit is payable; and
 - One third of the access fee is payable as a deposit by the Requestor.
- The actual postage is payable when a copy of a record must be posted to a Requestor.

ANNEXURE A – GLOSSARY OF TERMS

Data Subject means a natural person or juristic person to whom Personal Information relates or from which a Data Subject can be identified.

Destruction means disposal and/ or destruction and/ or de-identification of records of Personal Information where Adcorp Group is no longer authorized to retain or such Personal Information becomes obsolete in terms of Adcorp Group's data retention policy timelines and such Destruction shall be done in a manner that prevents reconstruction in an intelligible form.

Operator means any person or entity that processes Personal Information on behalf of the Adcorp Group. Adcorp Group, where it is a responsible party, determines the purpose and means of processing Personal Information.

- **Personal Information** means (and for the purposes of this policy will include Special Personal Information when applicable) information relating to an identifiable, living, natural person, and where it is applicable, to an identifiable, existing juristic person, including but not limited to: information relating to the race, gender, sex, pregnancy, marital status, nationality, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education, medical, criminal or employment history of the person as well as information pertaining to financial transactions;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment of the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.

Personal Information in terms of a juristic person including but not limited to:

- full name of the legal entity;
- company registration number;
- identity number, name, surname, address, postal code;
- tax and/or VAT number;
- banking details;
- contact information;
- details of the person responsible for the client and / supplier account; and / or
- residential and postal address.

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination

by means of transmission, distribution or making available in any other form; or merging, linking, as well as restriction, degradation, erasure or destruction or information.

Retention means the records that captured, kept, maintained and used for their relevant purpose only for the length of time for which they are required.

Special Personal Information means information concerning an individual's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, criminal behaviour of a person subject to the extent that such information relates to the alleged commission by the employee of any offence or any proceedings in respect of any offence allegedly by an employee or about the disposal of such proceedings.

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(s 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000))

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
Adcorp Place
102 Western Service
Road
Gallo Manor Ext 6
2191
(Address)

E-mail address: compliance@adcorpgroup.com

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>	
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			
<p><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></p>			
Description of record or relevant part of the record:			
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>	
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	
<i>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.</i>	
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:	

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

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

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

Signature of Information Officer

Form 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

- 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.

You requested:

Personal inspection of information at registered address of public/private body (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) 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.	
--	--

OR

You requested:

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

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 (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (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)	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

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 <ul style="list-style-type: none"> To be provided by requestor 	R40.00		
(ii) Compact disc <ul style="list-style-type: none"> If provided by requestor If provided to the requestor 	R40.00 R60.00		
For a transcription of visual images per A4-sizepage	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			
For a copy in a computer-readable form on:			
(i) Flash drive <ul style="list-style-type: none"> To be provided by requestor 	R40.00		
(ii) Compact disc <ul style="list-style-type: none"> If provided by requestor If provided to the requestor 	R40.00 R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

Deposit payable (if search exceeds six hours):

Yes

No

Hours of search		Amount of deposit <i>(calculated on one third of total amount per request)</i>	
-----------------	--	---	--

The amount must be paid into the following Bank account:

Name of Bank:

Name of account holder:

Type of account:

Account number:

Branch Code:

Reference Nr:

Submit proof of payment to:

Signed at _____ this _____ day of _____ 20_____

Information officer