

Reunert Limited (registration number 1913/004355/06)

Reunert Management Services Proprietary Limited
(registration number 1980/007949/07); and

Reunert Finance Company Proprietary Limited
(registration number 1961/006913/07)

**PAIA MANUAL IN TERMS OF SECTION 51
OF THE PROMOTION OF ACCESS TO
INFORMATION ACT (ACT, 2 of 2000) AS
AMENDED
("the Act")**

Purpose

The purpose of this document is to serve as the manual of Reunert as required in terms of the "Act", and to provide a reference as to the records held and procedures that need to be followed to request access to such records

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“Data Subject”	Means the person (natural and Juristic) to whom personal information relates
1.3	“IO“	Information Officer
1.4	“Minister”	Minister of Justice and Correctional Services
1.5	“PAIA”	Promotion of Access to Information Act, 2 of 2000 and regulations as amended;
1.6	“POPIA”	Protection of Personal Information Act, 4 of 2013 and regulations as amended.
1.7	“Regulator”	Information Regulator
1.8	“Republic”	Republic of South Africa
1.9	“Reunert”	collectively or individually, as the context may require, Reunert Limited (registration number 1913/004355/06), Reunert Management Services Proprietary Limited (registration number 1980/007949/07) and Reunert Finance Company Proprietary Limited (registration number 1961/006913/07)

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF REUNERT

3.1. Information Officer

Name and Surname	Anthonie de Beer
Telephone number	+27 11 517 9000
Email	popia@reunert.co.za

3.2. Deputy Information Officer

Name and Surname	Karen Louw
Telephone number	+27 11 517 9000
Email	popia@reunert.co.za

3.3 General contact details for Access to Information

Email	popia@reunert.co.za
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3.4 Main Office

Postal Address	PO Box 784391, Sandton, 2146, South Africa
Physical Address	Reunert, Nashua Building, Woodmead North Office Park, 54 Maxwell Drive, Woodmead, 2191
Telephone	+27 11 517 9000
Email	popia@reunert.co.za
Website	www.reunert.co.za

4. KEY CONTACT DETAILS AUDITORS

Name	KPMG Inc
Postal Address	Private Bag 9 Parkview 2122
Physical Address	85 Empire Road Parktown
Telephone	(011) 647 7111
Fax	(011) 647 8000

5. KEY CONTACT DETAILS OF THE INFORMATION REGULATOR

5.1 Information Regulator

The Information Regulator has taken over the function to regulate PAIA from the South African Human Rights Commission from the 30th of June 2021. The Information Regulator also regulates POPIA. A complaint may be lodged with the Information Regulator if you are not satisfied with the outcome of your request for information.

Contact details of the Information Regulator:

Postal Address	PO Box 3153, Braamfontein, Johannesburg, 2017
Physical Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Telephone	+27 (0) 10 023 5200
Email	enquiries@inforegulator.org.za
Website	https://www.inforegulator.co.za

6. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages and in braille.

6.1 The aforesaid Guide contains the description of-

- 6.1.1 the objects of PAIA and POPIA;
- 6.1.2 access to the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 6.1.2.1 the Information Officer of every public body, and
 - 6.1.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 6.1.3 the manner and form of a request for-
 - 6.1.3.1 access to a record of a public body contemplated in section 11³; of PAIA and
 - 6.1.3.2 access to a record of a private body contemplated in section 50⁴ of PAIA;
- 6.1.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 6.1.5 the assistance available from the Information Regulator in terms of PAIA and POPIA;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 6.1.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 6.1.6.1 an internal appeal;
 - 6.1.6.2 a complaint to the Regulator; and
 - 6.1.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 6.1.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 6.1.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 6.1.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 6.1.10 the regulations made in terms of section 92¹¹.
- 6.2 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 5 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

- 6.3 The Guide can also be obtained-
 - 6.3.1 upon request to the Information Officer;
 - 6.3.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 6.4 A copy of the Guide is also available in the following official languages, for public inspection during normal office hours, English, Afrikaans, IsiZulu, Ndebele, Sepedi, Sesotho, Swati, Tsonga, Tswana, Venda and Xhosa.

7 REASONS FOR ACCESS REFUSAL

A private body such as Reunert is entitled to refuse a request for information.

7.1 The main grounds for Reunert to refuse a request for information relates to the:

- 7.1.1 mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63 of PAIA) or a juristic person, as included in the POPIA which would involve the unreasonable disclosure of personal information of that natural or juristic person;
- 7.1.2 mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory, or contractual agreements, comply with the provisions of the POPIA;
- 7.1.3 mandatory protection of the commercial information of a third party (section 64 of PAIA) if the record contains:
 - 7.1.3.1 trade secrets of the third party;
 - 7.1.3.2 financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
 - 7.1.3.3 information disclosed in confidence by a third party to Reunert if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- 7.1.4 mandatory protection of confidential information of third parties (section 65 of PAIA) if it is protected in terms of any agreement;
- 7.1.5 mandatory protection of the safety of individuals and the protection of property (section 66 of PAIA); and/or
- 7.1.6 mandatory protection of records which would be regarded as privileged in legal proceedings (section 67 of PAIA).

7.2 The commercial activities (section 68 of PAIA) of a private body, such as Reunert, which may include:

7.2.1 trade secrets of Reunert;

7.2.2 financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of Reunert;

7.2.3 information which, if disclosed could put Reunert at a disadvantage in negotiations or commercial competition;

7.2.4 a computer program which is owned by Reunert and which is protected by copyright; and/or

7.2.5 the research information (section 69 of PAIA) of Reunert or a third party, if its disclosure would disclose the identity of Reunert, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

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

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

If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of PAIA. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

You will be notified in writing on **Form 3** as required by PAIA as to whether your request for information has been approved or denied within 30 (Thirty) calendar days after receipt of a completed request (refer **Form 2** as per **Annexure A**).

8 CATEGORIES OF RECORDS OF REUNERT WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

*The categories of records held by Reunert, which are available without a person having to request access by completing **Form 2** as per the PAIA regulations (27 August 2021), are set out in **Table 1** below. These are records that are available on the website (where indicated) and a person may download these documents, or request them telephonically, or by sending an e-mail (Refer paragraph 3.3) or a letter.*

Table 1			
Category of records	Types of the Record	Available on Website	Available upon request
Compliance	Terms and Conditions of use for the website	X	
Compliance	Privacy policy for the website	X	
Compliance	PAIA Manual	X	
Compliance	PAIA Form 2 - Request for access to record	X	
Compliance	PAIA Form 3 - Outcome of request and of fees payable	X	
Compliance	POPIA Form 1 - Objection to the processing of personal information	X	
Compliance	POPIA Form 2 - Request for correction or deletion of personal information or destroying or deletion of record	X	
Compliance	SARS Tax Compliance Status (TCS)		X
Compliance	BBBEE affidavit		X
Compliance	Company registration document (CIPC)		X
Compliance	VAT registration		X
Statutory Records	Memorandum of Incorporation	X	X
Statutory Records	Register of Directors		X
Statutory Records	Register of Members		X
Marketing	Company Profile		X
Marketing	Public Product Information		X
Corporate Communications	Media releases	X (some)	X
Corporate Communications	SENS Announcement's	X	X

Table 1			
Category of records	Types of the Record	Available on Website	Available upon request
Corporate Communications	Interim Financial statements (Reunert Group)	X	X
Corporate Communications	Annual Financial Statements (Reunert Group and Reunert Limited Company)	X	X
Corporate Communications	Annual Reports (Reunert Group)	X	X
Corporate Communications	Notice of Annual general meetings and special shareholders meetings (Reunert Limited)	X	X
Corporate Communications	An overview of group operations	X	X
Corporate Communications	Responsibility and sustainability reports (Reunert Group)	X	X

9 DESCRIPTION OF THE RECORDS OF REUNERT WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Table 2 sets out the records which are created and available in accordance with South African legislation. These records that are available by request: telephonically or by sending an e-mail (Refer paragraph 3.3), or a letter.

Table 2	
Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act number 71 of 2008
PAIA Manual	Promotion of Access to Information Act No 2 of 2000
PAIA Guides (Issued by Information Regulator and available on request)	Promotion of Access to Information Act No 2 of 2000

10 DESCRIPTION OF THE SUBJECTS ON WHICH THE REUNERT HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY REUNERT

*The subjects in respect of which Reunert holds records and the categories of records held on each subject is listed below, and a person can request access by completing **Form 2** as per the PAIA regulations (27 August 2021) (Refer **Annexure A** for example of **Form 2**).*

Although we have taken care to include applicable categories of documents, it is possible that other documents for categories of documents may be retained by the Company.

10.1. Chief Executive's office

- 10.1.1 Administration Records
- 10.1.2 Research Records
- 10.1.3 Sponsorship Records
- 10.1.4 Internal Reports and Communications
- 10.1.5 Financial Information and External Auditor Reports
- 10.1.6 Policies (Group and Reunert Limited)
- 10.1.7 General Correspondence

10.2 Accounting and Procurement

- 10.2.1 Accounting Records
- 10.2.2 Financial Reports and Statements
- 10.2.3 Risk Reports and Group Risk Management Records
- 10.2.4 Tax Records
- 10.2.5 Management Reports
- 10.2.6 Banking, Treasury Dealing and Settlement Records
- 10.2.7 Transaction Records
- 10.2.8 VAT Records
- 10.2.9 PAYE Records
- 10.2.10 Internal Reports and Communications
- 10.2.11 Procure Agreements
- 10.2.12 Quotes and invoices
- 10.2.13 General Correspondence

10.3 Company Secretary

- 10.3.1 Secretarial Records, including Statutory Records
- 10.3.2 Copies of documents filed with the Companies and Intellectual Property Commission and the Master of the High Court
- 10.3.3 General Correspondence

10.4 Human Resource (HR) Department

- 10.4.1 Employee Records
- 10.4.2 General HR Policies and Procedures
- 10.4.3 Training Records
- 10.4.4 Pension Records
- 10.4.5 Employee benefit records
- 10.4.6 Labour Relations Records
- 10.4.7 Statutory HR Records
- 10.4.8 Employment Equity Records
- 10.4.9 Broad-Based Black Economic Empowerment Records
- 10.4.10 Employment Contracts
- 10.4.11 General Correspondence

10.5 Information Technology Department

- 10.5.1 IT Contracts and Agreements
- 10.5.2 Operational IT Records
- 10.5.3 IT Equipment Records
- 10.5.4 IT Policy Records
- 10.5.5 General Correspondence

10.6 Legal Department

- 10.6.1 Litigation Records
- 10.6.2 Internal Reports and Communications

10.6.3 Contracts

10.6.4 General Correspondence

10.7 Customer Information

10.7.3 Customer/Client Data Records and Beneficial Ownership Information

10.7.5 General Correspondence

10.8 Occupational Health & Safety (OHS)

10.8.1 Appointment and Training Records

10.8.2 General Correspondence

10.9 Internal Audit

10.9.1 Internal Audit Records

10.9.2 General Correspondence

10.10 Risk Management

10.10.1 Insurance Records

10.10.2 Internal Controls Records

10.10.3 General Correspondence

10.10 Facilities Management

10.11.1 Property Records and Title Deeds

10.11.2 Valuation Records

10.11.3 Maintenance Records

10.11.4 Property-related Agreements and Leases

10.11.5 General Correspondence

11 PROCESSING OF PERSONAL INFORMATION

11.1 Purpose of Processing Personal Information

*There are various types of personal information that Reunert deal with. Refer to **Table 3** for the purpose per category of data subjects.*

11.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

*The categories of data subjects in respect of which/whom Reunert processes personal information and the nature or categories of the personal information being processed are depicted in **Table 3**.*

Table 3		
Categories of Data Subjects	Personal Information that may be processed	Purpose
Clients and prospective clients (including Debtors)	Natural Persons Names, Surnames, ID numbers, date of birth, e-mail address, physical address, postal address, contact numbers Juristic Persons Names or organisations, ID numbers, e-mail address, physical address, postal address, contact numbers, CIPC registration information, BBBEE ratings, financial data.	To comply with the Financial Intelligence Centre Act and to provide services to our clients, and to invoice them for products sold or services rendered.
Service Providers (including Suppliers/Vendors/Creditors)	Natural Persons Names, Surnames, ID numbers, date of birth, e-mail address, physical address, postal address, contact numbers	To engage, conduct due diligence investigations on and pay service providers for products received or

Table 3		
Categories of Data Subjects	Personal Information that may be processed	Purpose
	Juristic Persons Names of organisations, registration number, VAT numbers, physical address, email address, postal address, contact numbers, CIPC registration information, BBBEE status documents, SARS Tax Clearance, bank details, financial data.	services that they have performed.
Employees, Officers and Contractors	Natural Persons Name and surname, ID numbers, passport, date of birth, marital status, next of kin and family details, e-mail address, physical address, postal address, education and qualifications, gender and race, contact numbers, bank details, salary/remuneration amount, tax details, health information, union membership information and criminal record checks.	To employ staff, officers such as directors and engage contractors. To maintain employee records. To pay the employees and contractors. To comply with relevant legislation and with company policies and procedures.

11.3 The recipients or categories of recipients to whom the personal information may be supplied

*The person or category of persons to whom Reunert may disseminate personal information is depicted in **Table 4**.*

Table 4	
Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Names and Surname, Identity number for criminal checks	South African Police Services
Names and Surname, Identity number, qualifications for qualification verifications	South African Qualifications Authority
Names and Surname, Identity number, Addresses, health information, family information	Long-and Short-Term Insurers and Medical Aids
All personal information required by law for filing with the Companies and Intellectual Property Commission, including Names and Surname, Identity number, Addresses, contact details, occupation, financial information and ultimate beneficial ownership information	Companies and Intellectual Property Commission
All personal information required by law to comply with tax legislation	South African Revenue Service
All personal information reasonably required by the external auditors	External Auditors
All personal information reasonably required, from time-to-time, by third party service providers to carry out their contractual obligations to Reunert, subject to compliance with	Third-party service providers

Table 4	
Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
POPIA requirements relating to Operators	

11.4 Objection to processing of personal information

A data subject who wishes to object to the processing of personal information by Reunert must submit the objection to Reunert at any time during office hours. Reunert will not levy any charge for sending or receiving the objection.

The data subject must object using the prescribed **Form 1** (POPIA) as depicted in the POPIA Regulations dated 17 April 2025 (Refer to **Annexure D**) or a substantially similar document. The objection to the processing of personal information can be submitted to Reunert via hand, post, e-mail or another method agreed with Reunert. Refer to the contact details of Reunert stipulated in paragraph 3.1.

We have also uploaded POPIA **Form 1** to our website for easy reference.

When collecting personal identifiable information directly from a data subject as contemplated in Section 18 of POPIA, Reunert will inform the data subject in terms of Section 18(1)(h)(iv) of their right to object to the processing of their personal information, as referred to in Section 11(3) of POPIA.

If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by Reunert.

11.5 Correction or deletion of personal Information

Reunert acknowledges that the data subject has the right to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.

A data subject, who wishes to request the destruction or deletion of a record of his, her, or its personal information, in terms of section 24(1) (b) of POPIA, has the right to

request the destruction or deletion of a record of his, her or its personal information at any time. The request for destruction or deletion will be free of charge.

The data subject must request a correction or deletion of personal information on **Form 2** (POPIA) (refer **Annexure E**) as provided for in the POPIA Regulations dated 17 April 2025. This will be free of charge. The correction or deletions of personal information can be submitted to Reunert via hand, post or email or another method agreed with Reunert. Refer to the contact details of Reunert stipulated in paragraph 3.1.

A request for a correction or deletion of personal information by telephonic means shall be recorded by Reunert and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof, which shall be free of charge.

We have also uploaded POPIA **Form 2** to our website for easy reference.

On receipt of this request, and after Reunert have verified the identity of the data subject, we will provide the data subject with a record of the data subjects personal information that Reunert have. After evaluation we will then do the following:

- correct the information;
- destroy or delete the information;
- provide the data subject, to his or her satisfaction, with credible evidence in support of the information; or
- where agreement cannot be reached between Reunert and the data subject, and if the data subject so requests, take such steps as are reasonable in the circumstances, to attach to the information in such a manner that it will always be read with an indication that a correction of the information has been requested but has not been made.

If the case where the data subject still don't agree with Reunert, the data subject has a right to refer the matter to the Information Regulator (refer paragraph 4.1 for the details of the Information Regulator).

Reunert will within thirty (30) days of receipt of the outcome of the request, notify a data subject, in writing, of the action taken as a result of the request.

11.6 Planned transborder flows of personal information

Reunert does transfer Personal Information outside of South Africa. If Personal Information is transferred offshore, Reunert will only transfer such Personal Information to other countries who have similar privacy and data protection laws as those in South Africa, as required by section 72 of POPIA or, if not possible, compliance with the relevant provisions of POPIA relating the cross-border flow of personal information.

11.7 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Reunert is committed to ensuring that personal and sensitive Information is secure. In order to prevent unauthorised access or disclosure to any Personal Information, Reunert has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information it collects.

Reunert makes use of secure data transmission and storage technologies to reasonably protect personal and sensitive Information from unauthorised disclosure and to maintain the integrity of your personal and sensitive Information. Reunert takes all reasonable technical and organisational measures to ensure the security of Personal and sensitive Information.

Reunert has information security policies and procedures and have implemented security measures the cover the following areas:

1. Physical – Personal and sensitive information processed at Reunert’s offices or at reputable data centres with the necessary physical measures in place;
2. Logical – Only people that must have access to information/data to perform their tasks have that access. Strong passwords are used to access information/data that is classified as restricted/confidential; and
3. Operational – Anti-malware and anti-virus solutions are used, vulnerability tests are done and backups are made on a regular basis; and
4. Employees – Prospective employees have been screened before appointment. Employees are also trained in relation to policies and procedures as and when required.

12 INFORMATION WE HOLD TO COMPLY WITH THE LAW

Where applicable to its operations, Reunert also retains records and documents in terms of the legislation described below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the specific Act; the below mentioned legislation and applicable internal policies and procedures, should such interested parties be entitled to such information. A person can request access by completing **Form 2** as per the PAIA regulations (27 August 2021) (Refer **Annexure A** for example of **Form 2**).

It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in paragraph 6 of this Manual.

Although we have taken care to include applicable legislation, it is possible that other legislation may also apply to Reunert and its recordkeeping.

Reunert hold information in accordance with the following legislation:

- 12.1 Basic Conditions of Employment Act, 75 of 1997;
- 12.2 Broad – Based Black Economic Empowerment Act, 53 of 2003;
- 12.3 Companies Act, 71 of 2008;
- 12.4 Compensation for Occupational Injuries and Diseases Act, 130 of 1993;
- 12.5 Competition Act, 89 of 1998;
- 12.6 Constitution of the Republic of South Africa 1996;
- 12.7 Construction Industry Development Board Act, 38 of 2000;
- 12.8 Consumer Protection Act, 68 of 2008;
- 12.9 Copyright Act, 98 of 1978;
- 12.10 Customs and Excise Act, 91 of 1964
- 12.11 Electronic Communications and Transactions Act, 25 of 2002;
- 12.12 Employment Equity Act, 55 of 1998;
- 12.13 Financial Advisory and Intermediary Services Act, 37 of 2002;
- 12.14 Financial Intelligence Centre Act, 38 of 2001;
- 12.15 Financial Markets Act, 19 of 2012;
- 12.16 Income Tax Act, 58 of 1962;
- 12.17 Insolvency Act, 24 of 1936,
- 12.18 Labour Relations Act, 66 of 1995;

- 12.19 Intellectual Property Laws Amendment Act, 38 of 1997;
- 12.20 National Credit Act, 34 of 2025;
- 12.21 National Environmental Management Act, 107 of 1998
- 12.22 National Environmental Management: Air Quality Act, 39 of 2004;
- 12.23 National Environmental Management: Protected Areas Act, 57 of 2003;
- 12.24 National Environmental Management: Waste Act, 59 of 2008;
- 12.25 National Road Traffic Act, 93 of 1996;
- 12.26 Occupational Health and Safety Act, 85 of 1993;
- 12.27 Pension Funds Act, 24 of 1956;
- 12.28 Prescription Act, 68 of 1969;
- 12.29 Prevention and Combatting of Corrupt Activities, 12 of 2004;
- 12.30 Prevention of Organised Crime Act, 121 of 1998;
- 12.31 Promotion of Access to Information Act, 2 of 2000;
- 12.32 Protection of Personal Information Act, 4 of 2013;
- 12.33 Securities Transfer Tax Act, 25 of 2007
- 12.34 Securities Transfer Tax Administration Act, 26 of 2007
- 12.35 Skills Development Act, 97 of 1998;
- 12.36 Skills Development Levies Act, 9 of 1999;
- 12.37 Tax Administration Act, 28 of 2011;
- 12.38 Trademark Act, 194 of 1993;
- 12.39 Trust Property Control Act, 57 of 1988
- 12.40 Unemployment Insurance Act, 63 of 2001;
- 12.41 Unemployment Insurance Contributions Act, 4 of 2002; and
- 12.42 Value Added Tax Act, 89 of 1991.

13 HOW MUCH WILL IT COST YOU?

- 13.1. Section 52(3) of PAIA states that fees payable for access to records are to be prescribed.
- 13.2. Refer to **Annexure B** for **Form 2** of PAIA (Outcome of request and of fees payable) and **Annexure C** for the detailed fees schedule in respect of private body's that was published in the PAIA regulation dated 27 August 2021.

14 AVAILABILITY OF THE MANUAL

14.1 A copy of the Manual is available-

14.1.1 on website of Reunert (www.reunert.co.za); or

14.1.2 at the main office of Reunert for public inspection during normal business hours;

14.1.3 to any person upon request; and

14.1.4 to the Information Regulator upon request.

15 UPDATING OF THE MANUAL

The Information Officer of Reunert will update this manual as required.

Issued by

Anthonie de Beer

Information Officer

ANNEXURE A - PAIA 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 person.

☐

Request is made on behalf of another

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 <i>(if applicable)</i> :			
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:	
Reference number, if available	
Any further particulars of record	
TYPE OF RECORD (Mark the applicable box with an "X")	
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:	

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	

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 (Please specify)

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

ANNEXURE B - PAIA FORM 3 - OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

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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OR

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

☐

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 • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00		
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 • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00		
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:

Account number:

Branch Code:

Reference Nr:

Submit proof of payment to:

Signed at _____ this _____ day of _____ 20 _____

Information officer

ANNEXURE C - FEES SCHEDULE

The fees schedule for private body's as per the PAIA regulation dated 27 August 2021 is depicted below.

Nr	Item	Cost per A4 Size page or part thereof/item	Number of pages/items	Total
1	The requester fee payable by every requestor	R 140.00		
2	Photocopy	R2.00 per page or part thereof	To be advised	To be advised
3	Printed copy	R2.00 per page or part thereof	To be advised	To be advised
4	For a copy in a computer-readable form on: (i) Flash drive To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R 40.00 R 40.00 R 60.00	To be advised	To be advised
5	For a transcription of visual images per A4 size-page	Service to be outsourced. Will depend on the quotation of the service provider	To be advised	To be advised
6	Copy of visual images		To be advised	To be advised
7	Transcription of an audio record, per A4-size	R24.00	To be advised	To be advised
8	Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00	To be advised	To be advised
9	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. To not exceed the total cost of	R145.00 R435.00	To be advised	To be advised
10	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.	To be advised	To be advised
11	Postage, email or any other electronic transfer.	Actual costs	To be advised	To be advised
TOTAL				To be advised

ANNEXURE D - POPIA FORM 1 - OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2021 [Regulation 2]

Note:

1. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form.*
2. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	

C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(3)(a) <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

Signature of data subject/designated person

ANNEXURE E - POPIA FORM 2 - REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD

FORM 2

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

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2021

[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.*

Mark the appropriate box with an "x".

Request for:

- a) Correction ☐ or deletion ☐ of personal information about the data subject which is in possession or under the control of the responsible party.

Please select applicable reasons for the selected request:

- | | |
|-------------------------|--------------------------|
| (a) Inaccurate | ☐ |
| (b) Irrelevant | ☐ |
| (c) Excessive | ☐ |
| (d) Out of Date | ☐ |
| (e) Incomplete | ☐ |
| (f) Misleading | ☐ |
| (g) Obtained unlawfully | ☐ |

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

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	PERSONAL INFORMATION TO BE CORRECTED/DESTROYED/DELETED <i>(Please specify the personal information required to be corrected / destroyed / deleted)</i>
D	EXPLANATION FOR THE SELECTED REASON FOR A REQUEST <i>(Please provide detail explanation for the selected reasons for the request for correction or deletion of personal information which is in possession or under the control of the responsible party)</i>

Signed at this day of20.....

.....
Signature of data subject/ designated person