



PAIA MANUAL
of
THE BIDVEST GROUP LIMITED
(Registration no: 1946/021180/06)

This Manual is prepared in terms of Section 51 of the Promotion of Access to Information Act No 2 of 2000 ("PAIA") as amended by the Protection of Personal Information Act, No 4 of 2013 ("POPIA")

TABLE OF CONTENTS

1.	Definitions
2.	Introduction to PAIA and POPIA
3.	The purpose of the Bidvest PAIA Manual
4.	Information Regulators PAIA Guide
5.	Company Overview and Scope of Manual
6.	The Bidvest Group Limited - Contact Details
7.	Records which are Automatically Available
8.	Records held by Bidvest available on Request for Access
9.	Information related to Personal Information
10.	Request For Access - Procedure
11.	Fees Prescribed
12.	Timelines for Consideration of a Request for Access
13.	Grounds for Refusal of Access and Protection of Information
14.	Remedies Available to a Requester
	APPENDICES (FORMS) APPENDIX A Request for Access to Information (PAIA) APPENDIX B Outcome of Request and Fees Payable APPENDIX B1 Fees of Private Bodies APPENDIX C Objection Form (POPIA) APPENDIX D Rectification Form /Deletion (POPIA)

1. DEFINITIONS

“Bidvest”, “Group”, “we”, “us” and “our”	means The Bidvest Group Limited (registration number 1946/021180/06) and, where the context so requires, its subsidiaries identified in the Information Officer Directory - accessible on The Bidvest Group website.
“Data Subject”	means the person to whom the Personal Information relates.
“Manual”	means this Bidvest Group Limited PAIA manual, together with all APPENDICES hereto.
“PAIA”	means the Promotion of Access to Information Act, No 2 of 2000.
“POPIA”	means the Protection of Personal Information Act, No 4 of 2013.
“Processing”	means any operation or activity, whether or not by automatic means, concerning Personal Information including collection, receipt, storage, alteration, erasure (as further defined in POPIA).
“Record”	means any recorded information, regardless of form or medium which includes writing, label, marking, hardware, software, book, image (as further defined in POPIA).
“Regulator”	means the Information Regulator (as established in terms of section 39 of POPIA).
“Requester”	means any person making a Request for Access to a Record held by Bidvest.
“Request for Access”	means a Request for Access to a Record (as further defined in section 1 of PAIA).

2. INTRODUCTION TO PAIA AND POPIA

PAIA:

The Promotion of Access to Information Act, 2000 ("PAIA") commenced on 9 March 2001, which among other things:

- Seeks to give effect to a person's Constitutional right of access to information (subject to certain limitations) and sets out the procedural process to follow to exercise or protect this right.
- Obliges private and public bodies to compile a PAIA Manual, which sets out how a person, who is desirous of requesting certain information which he/she believes he/she has a right to, may go about requesting such information.
- Where a person is desirous of obtaining information from a private or public body in terms of PAIA, then such person must make a request in the format as prescribed by PAIA by following the laid-out procedure and using the prescribed forms, as described in the private or public entities PAIA Manual.
- Upon receipt of the Request for Access, the body receiving the request must decide if it is able to provide the requested information to the Requester in accordance with the provisions of PAIA.

POPIA:

The Protection of Personal Information Act, 2013 ("POPIA") commenced on 1 July 2020 and gives effect to:

- a person's right to privacy, including the right to data privacy, and in accordance with this objective, describes and prescribes a series of conditions which must be met when Personal Information is processed, which conditions establish the minimum requirements for the Processing of Personal Information
- amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of Personal Information.

3. THE PURPOSE OF THE BIDVEST PAIA MANUAL

The purpose of this PAIA Manual is to understand:

- the categories of Records that are **automatically** available without a person having to submit a Request for Access.
- a **description** of the Records which are available per **other legislation**.
- how Bidvest processes Personal Information, the categories of information and data subjects, the recipients thereof, and the security measures employed.
- the procedure that a Requester must follow to make a Request for Access, the forms to complete, and the way a Request for Access will be facilitated by Bidvest.

4. INFORMATION REGULATOR'S PAIA GUIDE

- 4.1 The Regulator has compiled an official PAIA Guide which sets out clearly how to exercise any right contemplated in PAIA or POPIA. The Regulator's Guide is available in each of the official languages and in braille.
- 4.2 A copy of the Guide can be obtained: –
- 4.2.1 directly from the Regulator (details below)
 - 4.2.2 upon request from the Information Officer;
 - 4.2.3 downloaded from the website of the Regulator <https://infoeregulator.org.za/paia-guidelines/>
 - 4.2.4 downloaded from the Bidvest website <https://www.bidvest.co.za/access-to-information.php>

NOTE: Copies of the Regulators PAIA Guide are available in all the official languages, for public inspection, free of charge, during normal office hours at the reception of The Bidvest Corporate Office (physical address set out in section 6 below). A copy of the Guide may be requested from the Information Officer using the prescribed Form 1, which is available on the Regulators website.

Subsidiary businesses will have copies in at least two languages at all principal places of business.

Address:	The Information Regulator (South Africa) Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Telephone Number:	Toll-Free: 0800 017 160 Landline: 010 023 5200
E-mail Address:	Complaint's email: PAIAcomplaints@infoeregulator.org.za General enquiries: enquiries@infoeregulator.org.za Information Officer Registration: Registration.IO@infoeregulator.org.za
Website	https://www.infoeregulator.org.za

5. COMPANY OVERVIEW AND SCOPE OF MANUAL

5.1 COMPANY OVERVIEW:

- The Bidvest Group Limited is a JSE - listed Company whose subsidiaries operate principally in the services, trading and distribution sectors.
- The Group operates through a decentralised business structure as described in the integrated annual report on the Bidvest website.

For further information about The Group, please visit the website:

<https://www.bidvest.co.za/about.php>

5.2 SCOPE OF MANUAL:

- This Manual is the PAIA Manual of The Bidvest Group Limited and also serves as a common pro forma PAIA Manual for those Bidvest subsidiaries identified in the Information Officer Directory, as relying on or having adopted this Manual.
- The use or adoption of this Manual does not consolidate The Bidvest Group Limited and its subsidiaries into a single private body for purposes of PAIA. Each Bidvest entity remains a separate private body and independently retains its obligations and responsibilities under PAIA and POPIA.
- Where a Bidvest entity relies on or adopts this Manual, this Manual must be read as applying separately to that entity, with references to “Bidvest”, “we”, “us” or “our” being construed, where appropriate, as references to the particular Bidvest entity that—
 - holds or controls the Record to which a Request for Access relates; or
 - is the Responsible Party in relation to the Personal Information concerned.
- Each Bidvest entity is responsible, through its own Information Officer or authorised Deputy Information Officer, for receiving, considering and determining Requests for Access relating to Records held or controlled by that entity.
- Certain Bidvest entities maintain their own PAIA manuals because of their particular operational or regulatory requirements. Where an entity maintains its own manual, that manual must be consulted and will apply to Requests for Access relating to Records held by that entity.
- A Request for Access submitted to The Bidvest Group Limited or the Group Information Officer which relates to Records held by another Bidvest entity will be referred to the Information Officer or authorised Deputy Information Officer of the relevant entity for consideration and determination.
- The Group Information Officer may coordinate and facilitate the referral and administration of Requests for Access throughout the Group. Such coordination does not transfer responsibility for a request from the Bidvest entity that holds or controls the relevant Record.
- The Information Officer Directory is published on the Bidvest website.

The Manual is available:

- for downloading, free of charge from The Bidvest Group Limited website:
<https://www.bidvest.co.za/access-to-information.php>
- for public inspection, free of charge, during normal business hours at the Corporate Office identified in clause 6; and
- in hard copy format upon request to the Information Officer, subject to payment of a reasonable reproduction fee where applicable.

6. THE BIDVEST GROUP LIMITED - CONTACT DETAILS

Chief Executive Officer	Mpumi Madisa
Physical Address	Bidvest House, 18 Crescent Drive, Melrose Arch, 2196
Postal Address	P O Box 87274, Houghton, 2041
Telephone Number/Head Office	+27 (0) 11 772 8700
Facsimile Number	+27 (0) 11 772 8970
Email Address	info@bidvest.co.za

Contact details of the Group's Information Officer:

Information Officer	Ms C. Krige
Physical Address	Bidvest House, 18 Crescent Drive, Melrose Arch, 2196
Postal Address	P O Box 87274, Houghton, 2041
Internet Address	www.bidvest.co.za
Telephone Number	+27 (0) 11 772 8700
Facsimile Number	+27 (0) 11 772 8970
Email Address <i><u>(This email address can be used to submit a Request for Access to:</u></i> <i><u>The Information Officer and</u></i> <i><u>Deputy Information Officer)</u></i>	information.officer@bidvest.co.za

A current directory of Bidvest entities, their Information Officers or designated contact persons, and links to the applicable company websites and/or PAIA manuals is available on the Bidvest website.

7. RECORDS WHICH ARE AUTOMATICALLY AVAILABLE

All information housed under the public areas of the Bidvest Group website is automatically available and accessible for downloading, subject to the website terms of use and applicable disclaimers.

The categories of Records described below are automatically available without a person being required to submit a formal Request for Access.

- annual and interim reports;
- SENS announcements;
- corporate governance documents;
- investor information;
- published policies and notices;
- media releases;
- career information; and other information published in the public areas of the Bidvest website.
<https://www.bidvest.co.za/>

8. RECORDS HELD BY BIDVEST AVAILABLE ON REQUEST FOR ACCESS

- 8.1 The table sets out a description of the subjects of Records which are held by Bidvest together with a description of the categories of those Records (Section 51(1) (b) (iv) of PAIA).
- 8.2 Bidvest is subject to many laws and regulations, some of which require us to keep certain Records. The legislation in terms of which the Records are held is also described in the table below (Section 51(1) (b) (iii) of PAIA) and is not an exhaustive list.
- 8.3 A Requester is required to make a Request for Access to these Records by completing a Request for Access Form using Form 2 under APPENDIX A.
- All Requests for Access will be evaluated on a case-by-case basis according to the provisions of PAIA. Please note that many of the Records held by Bidvest are those of third parties, such as clients and employees. Requests for Access to these Records will be carefully considered.

Subjects of Records and Applicable Legislation	Categories of Records
Statutory Company Information <i>COMPANIES ACT No 71 of 2008</i>	○ Incorporation documents ○ Memorandum of Incorporation ○ Minute books, Resolutions ○ Corporate and governance Records relating to subsidiaries, to the extent held by the relevant Bidvest entity. ○ Registers of directors and officers ○ Share registers and other statutory registers ○ Statutory returns to relevant authorities ○ Statutory Records ○ Records relating to appointment of directors, auditors, company secretary, public officer and other officers.
Financial and Accounting Records <i>FINANCIAL ADVISORY AND INTERMEDIARY SERVICES ACT 37 of 2002</i> <i>FINANCIAL INTELLIGENCE CENTRE ACT 38 OF 2001 (AS AMENDED)</i> <i>VALUE-ADDED TAX ACT 89 OF 1991</i>	○ Annual Financial Statements ○ Accounting Records (inclusive of books of account) ○ Administrative Records ○ Banking Records ○ Internal and external audit reports ○ Rental agreements ○ Invoices ○ Supporting schedules and documentation to books of account ○ Lease agreements ○ Asset registers ○ Sale Agreements ○ Intellectual Property records
Tax Records <i>INCOME TAX ACT 58 of 1962</i> <i>VALUE-ADDED TAX ACT 89 OF 1991</i> <i>TAX ADMINISTRATION ACT 28 of 2011</i> <i>TRANSFER DUTY ACT 40 OF 1949</i> <i>COMPENSATION FOR OCCUPATIONAL INJURIES AND DISEASES ACT 130 of 1993</i>	○ Customs and Excise Records ○ Income tax returns and other documentation ○ PAYE Records ○ Skills Development Levies Records ○ UIF and Compensation for Occupational Injuries and Diseases Act Records ○ Value Added Tax Records

Legal Records <i>TRANSFER DUTY ACT 40 OF 1949</i> <i>PRESCRIPTION ACT 68 OF 1969</i>	○ Documentation pertaining to litigation or arbitration ○ General agreements and contracts ○ Licenses, permits and authorizations
Insurance Records <i>Insurance Act 18 of 2017</i>	○ Claims Records ○ Details of insurance coverage, limits, and insurers ○ Insurance policies
Employee Records <i>EMPLOYMENT EQUITY ACT 55 of 1998</i> <i>BASIC CONDITIONS OF EMPLOYMENT ACT 75 OF 1997</i> <i>BROAD-BASED BLACK ECONOMIC EMPOWERMENT ACT 53 OF 2003</i> <i>OCCUPATIONAL HEALTH AND SAFETY ACT 85 OF 1993</i> <i>PROMOTION OF EQUALITY AND PREVENTION OF UNFAIR DISCRIMINATION ACT 4 OF 2000</i> <i>SKILLS DEVELOPMENT ACT 97 OF 1998</i> <i>UNEMPLOYMENT INSURANCE ACT 63 OF 2001</i> <i>LABOUR RELATIONS ACT 66 OF 1995</i> <i>PENSION FUNDS ACT 24 OF 1956</i>	○ Agreements with trade unions ○ Arbitration awards ○ Attendance registers ○ Casual employee Records ○ CCMA Records ○ Code of conduct ○ Company tax submissions in respect of employees ○ Confidentiality agreements ○ Disciplinary Records and internal evaluations ○ Employee personal details ○ Employment conditions and policies ○ Employment contracts ○ Employment equity plan ○ Internal correspondence ○ Internal Records, policies, and procedures ○ Leave Records ○ Operating manuals ○ Medical aid Records ○ Personnel Records provided by personnel ○ Records of strikes, lockouts or protest action ○ Remuneration and benefits Records ○ Restraint of trade agreements ○ Retirement and Pension fund Records ○ Service Records ○ Share option schemes registers ○ Share option schemes rules ○ Share purchase scheme register ○ Share purchase scheme rules ○ Training schedules and material
Customer Records / Credit Services / Third Party Records <i>VALUE-ADDED TAX ACT 89 OF 1991</i> <i>NATIONAL CREDIT ACT 34 OF 2005</i>	○ Customer contracts ○ Credit application forms ○ Customer Records ○ Debtors with collection agents ○ Records of customer details and payment performance listed with credit bureaus ○ Sales Records ○ Terms and conditions of sale

	○ Transaction Records ○ Code of Conduct ○ Supplier contracts ○ Terms and conditions for dealing with suppliers ○ Transactional Records and supporting information
--	---

NOTE: - Legislation only applies to the extent applicable to the relevant Bidvest entity and its activities.

9. INFORMATION RELATED TO PERSONAL INFORMATION

In terms of POPIA, Bidvest is required to provide you with a description of the Personal Information that it processes, the purpose for which it is processed and with whom it may be shared.

The type of Personal Information that is processed will depend on the purpose for which it is collected.

Personal information is processed for employment and workforce administration; customer and supplier management; contracting; financial administration; legal and regulatory compliance; risk management; health and safety; security and access control; fraud prevention; marketing where lawful; corporate governance; due diligence; business transactions; and the establishment, exercise or defence of legal claims.

We will disclose the purpose for the collection and will process the Personal Information in accordance with that purpose. For further information related to the purpose visit the Internal and External Processing Notice on the Bidvest website. <https://www.bidvest.co.za/data-protection.php>

9.1 The Personal Information Bidvest processes and to whom it belongs:

The list below describes the Personal Information that Bidvest Processes and to which broad category of data subject the Personal Information belongs:

9.1.1 Clients:-

- 9.1.1.1 Natural persons: names; contact details; physical and postal addresses; date of birth; ID number; tax related information; nationality; gender; confidential correspondence.
- 9.1.1.2 Juristic persons / entities / business partners: names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners
- 9.1.1.3 Foreign persons / entities: names; contact details; physical and postal addresses, financial information; date of birth; passport number; tax related information; nationality; gender; confidential correspondence; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.

9.1.2 Contracted Service Providers/Suppliers/franchisors/franchisees - Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories, beneficiaries, banking information.

9.1.3 Intermediaries/advisors/Banks/Insurers /Agents; Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; founding documents; tax related information; authorised signatories, beneficiaries, ultimate beneficial owners.

9.1.4 Employees / Directors / prospective employees / learners / interns / volunteers / temporary employees / shareholders and where relevant, their family members, dependants and beneficiaries - names; identity and contact information; physical and postal addresses; date of birth; age; gender; marital status; pregnancy information; race; language; education and

employment history; financial and remuneration information; tax information; next-of-kin and emergency-contact information; information relating to dependants and beneficiaries where required for employment benefits, bursaries, emergency contacts or other legitimate employment-related purposes; performance and disciplinary information; opinions; alleged or actual criminal conduct and related proceedings, where lawfully processed; trade-union membership; external commercial interests; images; health, medical and well-being information; and other demographic information, in each case only where relevant, lawful and necessary.

- 9.1.5 Website end-users/Application end-users: names, electronic identification data: IP address; log-in data, cookies, electronic localization data; cell phone details, GPS data, social media.
- 9.1.6 Persons who interact with us physically or enter sites, offices, parking areas, manufacturing site, showroom and all facilities of the company or interact via websites / email / correspondence and who provide their Personal Information.

9.2 Categories of recipients of Personal Information

Personal information may be shared, where lawful and necessary, with Group entities; employees and authorised personnel; professional advisers; auditors; banks; insurers; pension and medical-scheme administrators; service providers and operators; customers and business partners; regulatory and law-enforcement bodies; courts and tribunals; and other persons authorised by law or by the Data Subject. For PAIA disclosures Personal Information may be disclosed pursuant to a valid request under PAIA only where disclosure is authorised or required under PAIA and is not prohibited by POPIA or other applicable law.

9.3 Cross-border flows of Personal Information

Bidvest may transfer Personal Information outside South Africa where permitted by section 72 of POPIA, including where the recipient is subject to a law, binding corporate rules or binding agreement that provides an adequate level of protection, or where another lawful ground for the transfer applies.

9.4 Security measures

Depending on the nature of the information, the risks involved and the systems concerned, measures may include:

- 9.4.1 Firewalls; authentication software; intrusion detection systems; unique user profiles; encryption;
- 9.4.2 Antivirus and anti-malware software and update protocols;
- 9.4.3 Logical and physical access control; alarm systems; biometric access barriers; video monitoring;
- 9.4.4 Secure setup of hardware and software making up our information technology infrastructure; and
- 9.4.5 Outsourced service providers who are contracted to implement security controls.
- 9.4.6 Cyber security incident response plan.

9.5 Objection: (Section 11(3) of POPIA)

A Data Subject may, at any time and on reasonable grounds relating to the Data Subject's particular situation, object to the Processing of Personal Information in the circumstances contemplated in section 11(3) of POPIA, unless legislation permits or requires such Processing. See Popia Form 1 attached to this Manual as Appendix C.

9.6 Correction or deletion of Personal Information

In terms of section 24 of POPIA, a Data Subject may request Bidvest to—

- 9.6.1 correct or delete Personal Information concerning the Data Subject that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or

- 9.6.2 destroy or delete a Record of Personal Information concerning the Data Subject that Bidvest is no longer authorised to retain.

A request contemplated in this clause must be submitted to the relevant Information Officer using the prescribed POPIA Form 2, attached to this Manual as Appendix D, together with sufficient information to identify the Data Subject and the Personal Information concerned.

The relevant Bidvest entity will consider the request in accordance with POPIA and will inform the Data Subject of the action taken as a result of the request.

9.7 Access to Personal Information

In terms of section 23 of POPIA, a Data Subject may, upon providing adequate proof of identity, request Bidvest to confirm, free of charge, whether it holds Personal Information concerning that Data Subject.

A Data Subject may also request:

- 9.7.1 access to, or a description of, the Personal Information held by Bidvest concerning the Data Subject; and
- 9.7.2 information regarding the identity of third parties, or categories of third parties, who have had access to that Personal Information.

A request for access to Personal Information must be submitted to the relevant Information Officer using PAIA Form 2, attached to this Manual as Appendix A, and will be processed in accordance with PAIA and POPIA.

Any prescribed fee for access to, or reproduction of, the Record may be payable before access is granted.

10. REQUEST FOR ACCESS - PROCEDURE

- 10.1 This section provides the Requester with the procedures to facilitate a Request for Access to a Record held by Bidvest.
- 10.2 Where a request does not contain sufficient information or does not substantially comply with the prescribed requirements, Bidvest will, where reasonably possible, assist the Requester to correct or complete the request before it is considered.
- 10.3 Furthermore, the successful completion and submission of a Request for Access on the prescribed Form does not automatically allow the Requester access to the Record.
- 10.4 A Requester will be entitled to access a Record of a private body where the Record is required for the exercise or protection of a right, the procedural requirements of PAIA have been complied with, and access is not refused on a ground permitted or required under PAIA.
- 10.5 All communications and notifications will be confirmed in writing.
- 10.6 Completion of the Prescribed Form (Section 53 of PAIA)

For Bidvest to respond to requests promptly, the Form 2 – APPENDIX A (as per Regulation 7) should be completed, taking due cognizance of the following *Instructions on the Completion of FORMS*:

- 10.6.1 The Request should preferably be completed in English. Where a Requester is unable to complete the Form in English, the Information Officer will provide reasonable assistance or arrange for the request to be interpreted, where reasonably practical.
- 10.6.2 Appropriate proof of identity must accompany the request. Bidvest may request certification or additional verification where reasonably necessary to confirm the identity or authority of the Requester.
- 10.6.3 THIRD PARTY REQUESTER: Where a request is made on behalf of another person, the Requester must provide proof of the capacity or authority in which the request is made, together with appropriate proof of identity of the Requester and the person on whose behalf the request is made. Bidvest may request certification or further verification where reasonably necessary.
- 10.6.4 Sufficient information must be provided to enable identification of the Record requested.

- 10.6.5 The manner and form of access must be indicated.
- 10.6.6 EXEMPTION: A person who, because of illiteracy, disability or another reasonable impediment, is unable to complete the prescribed Form may make the request orally. The Information Officer will reduce the request to writing and provide a copy to the Requester.

11. FEES PRESCRIBED

- 11.1 Upon receipt of a Request for Access, the Information Officer may, where applicable, notify the Requester that the prescribed request fee must be paid before further processing of the request. The outcome of the request and any fees payable will be communicated using prescribed Form 3 attached as Appendix B.
- 11.2 If the Request for Access is successful, an Access Fee may be payable, depending on the type of information requested, as described hereunder and APPENDIX B1.
- 11.3 There are two categories of fees payable:
 - 11.3.1 **The request fee:** Currently R140 (per PAIA Regulations) and may change from time to time. *The request fee is payable before the request is considered unless the Requester is exempt from payment in terms of PAIA or the regulations. The request fee is separate from any access fee that may become payable.*
 - 11.3.2 **The access fee:** An access fee may become payable prior to the Requester gaining access to the Records in the required form. The access fee is intended to reimburse Bidvest for the costs involved in reproduction of documents, searching, and preparing the Record requested and for any time reasonably required (more than the prescribed hours) to search and prepare the Record. The current access fees are set out in APPENDIX B1 and may change from time to time as set out in the Regulations.
- 11.4 A written estimate/quote will be provided by the Information Officer to the Requester, before reproduction, search or preparation costs incurred, where reasonably practical.
- 11.5 Payment details can be obtained from the Information Officer and payment must be made by electronic funds transfer. Proof of payment must be provided.

SEE APPENDIX B1 – FEES IN RESPECT OF PRIVATE BODIES.

12. TIMELINES FOR CONSIDERATION OF A REQUEST FOR ACCESS

- 12.1 Upon receipt of a Request for Access, the Information Officer will consult with all relevant personnel in the Group involved or associated with the Record.

Requests will be processed within 30 (thirty) days unless the request contains considerations that are of such a nature that an extension of the time limit is required.

The Requester will be notified thereof within 30 days of receipt of the Request for Access (section 56 of PAIA).

Should an extension be required, the initial 30 (thirty) days may be extended for a further period of no more than 30 (thirty) days. A Requester will be notified of the reasons explaining why the extension is necessary.

- 12.2 The following circumstances may affect the 30 days (section 57 of PAIA):
 - 12.2.1 Where a request does not contain the particulars required under section 53(2) of PAIA, the 30-day period will run from the date on which the required particulars are received.
 - 12.2.2 Section 57 permits one extension of no more than 30 days for large-volume searches, geographically dispersed records, necessary consultation, combinations of those circumstances, or written consent by the Requester.

12.3 **THIRD PARTIES:** Where a Request for Access relates to a Record containing information concerning a third party, the third party will be notified and afforded an opportunity to make representations or consent to disclosure in accordance with PAIA.

12.4 Decision on Request:

If no extension period or access fee deposit is needed the Requester will be notified by the Information Officer within the required period of the decision on their Request for Access. Failure to decide within the prescribed time constitutes a deemed refusal under section 58.

If the Request for Access to a Record is successful, the Requester will be notified of the following:

12.4.1 The amount of the access fee payable upon gaining access to the Record (if any);

12.4.2 An indication of the form in which the access will be granted;

If the Request for Access to a Record is not successful, the Requester will be notified and given adequate reasons for the refusal (refer to the Grounds for Refusal below).

The Information Officer will in addition inform the Requester of their right to lodge a complaint with the Regulator or an application with a court against the decision.

13. **GROUND FOR REFUSAL OF ACCESS AND PROTECTION OF INFORMATION**

13.1 PAIA contains mandatory and discretionary grounds upon which access must or may be refused. These are contained in Chapter 4 of Part 3 of PAIA and include the following:

13.1.1 the protection of privacy of a third person (who is a natural person) from unreasonable disclosure;

13.1.2 the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific, or technical information that may harm the commercial or financial interests of a third party);

13.1.3 if disclosure would result in the breach of a duty of confidence owed to a third party;

13.1.4 if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;

13.1.5 Records privileged from production in legal proceedings, unless the person entitled to the privilege has waived it;

13.1.6 if the Record contains trade secrets, financial or sensitive information or any information that would put us at a disadvantage in negotiations or prejudice Bidvest in commercial competition; and/or

13.1.7 if the Record contains information about research being carried out or about to be carried out on behalf of a third party or by the Group company.

13.2 Where a Record contains information that may or must be refused, but the protected information can reasonably be severed from the remainder of the Record, access will be granted to the remainder in accordance with section 59 of PAIA.

13.3 Records that cannot be found or do not exist:-

if all reasonable steps have been taken by Bidvest to find the Record requested by the Requester and the same cannot be found for reasons justifiable as per section 55 of PAIA, the Information Officer shall provide an affidavit or affirmation to the Requester advising that it is not possible to give access to the Record requested. The affidavit or affirmation will follow the requirements of section 55(2) of PAIA. If the Record is subsequently located, the Requester will be notified and given access, subject to PAIA and payment of any applicable access fee.

14. **REMEDIES AVAILABLE TO A REQUESTER**

A private body does not provide an internal appeal procedure under PAIA. A Requester or affected third

party who is dissatisfied with a decision, or with a failure to make a decision within the prescribed period, may lodge a complaint with the Information Regulator using prescribed Form 5 or apply to a competent court for appropriate relief, subject to the periods and procedural requirements prescribed by PAIA.

The prescribed PAIA Form 5 and guidance on lodging a complaint are available from the Information Regulator's website. Complaints may be submitted in the manner prescribed by the Regulator, including through its designated PAIA complaints channel.

APPENDICES – (FORMS)	
APPENDIX A	Request for Access to Record
APPENDIX B	Outcome of Request and Fees Payable
APPENDIX B1	Fees of Private Bodies
APPENDIX C	Objection Form (POPIA)
APPENDIX D	Rectification (POPIA)

PAIA VERSION DATE	July 2026
UPDATE IO DIRECTORY	July 2026

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

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

TO: The Information Officer

(Address)

E-mail address:

--

Fax number:

--

Mark with an "X"
☐ Request is made in my own name. ☐ Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		

Full names of person on whose behalf request is made (if applicable)				
Identity Number				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			
PARTICULARS OF RECORD REQUESTED <i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>				
Description of record or relevant part of the record:				
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 (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 record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
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 (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)	
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)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
If the provided space is inadequate, please continue on a separate page and attach it to this Form. The Requester must sign all the additional pages.	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. 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	

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

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.

1. 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

2. 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	

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 (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:

--

4. **Fees payable** with regards to your request:

Item	Cost per A4-size page or part thereof / item	Number of pages / items	Total
Photocopy	R2.00		
Printed copy	R2.00		
For a copy in a computer-readable form on: (i) Flash drive • To be provided by Requester (ii) Compact disc • If provided by Requester • If provided to the Requester	R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from 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 Requester (ii) Compact disc • If provided by Requester • If provided to the Requester	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 _____

Signature of Information officer

FEES

In respect of Private Bodies

Item	Description	Amount
1.	The request fee payable by every Requester	R140.00
2.	Photocopy / printed black & white copy of A4 size page	R2.00 per page or part thereof
3.	Printed copy of A4 size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on: - (iii) Flash drive (to be provided by Requester) (iv) Compact disc • If provided by Requester • If provided to the Requester	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4 size page	Service to be outsourced. Will depend on quotation from service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4 size page	R24.00
8.	Copy of an audio record on: (v) Flash drive (to be provided by Requester) (vi) Compact Disk • If provided by Requester • If provided to the Requester	R40.00 R40.00 R60.00
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 a total cost of: -	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

FORM 1

**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, 2017**
[Regulation 2(1)]

Note:

- Affidavits or other documentary evidence in support of the objection must be attached.*
- If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number....

A	DETAILS OF DATA SUBJECT	
Name and surname of data subject:		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		
B	DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party <i>(if the responsible party is a natural)</i> :		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		
Name of public or private body <i>(if the responsible party is not a natural person)</i> :		
Business address:		
	Code ()	
Contact number(s):		

Fax number:	
E-mail address:	
C	REASON FOR OBJECTION <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....

Signature of data subject (applicant)

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, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence applicable in support of the objection 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:

- ☐ **Correction or deletion of the Personal Information about the data subject which is in possession or under the control of the responsible party.**
- or**
- ☐ **Destroying or deletion of a record of Personal Information about the data subject which is in possession or under the control of the responsible party and who is no longer authorized to retain the record of information.**

A	DETAILS OF DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number:	
Residential, 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:	
Residential, postal or business address:	Code ()
Contact number(s):	
Fax number / E-mail address:	
C	INFORMATION TO BE CORRECTED / DELETED / DESTROYED

D	REASONS FOR *CORRECTIONS OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN <i>(Please provide detailed reasons for the request)</i>

Signed at on this day of 20.....

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