

Cargo Barn



Logistics

CARGO BARN LOGISTICS CC

Registration Number: 2009/094140/23

"the Company"

Prepared in terms of section 51 of the Promotion of Access to Information Act, No. 2
of 2000, as amended.

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Table of Contents

1	Definitions	3
2	Purpose of the PAIA Manual	4
3	Contact Details for Access to Information Requests.....	4
4	Guide on how to use PAIA and how to Obtain Access to the Guide.....	4
5	Latest Notices in terms of Section 52(2) of PAIA	5
6	Availability of Certain Records in terms of PAIA	5
7	Request Process	9
8	Grounds for Refusal.....	11
9	Remedies Should a Request be Refused	12
10	Fees	12
11	Processing of Personal Information	12
12	The Recipients or Categories of Recipients to whom the Personal Information may be Supplied	13
13	Planned Transborder Flows of Personal Information	15
14	Availability of the PAIA Manual.....	16
15	Objection to the Processing of Personal Information by a Data Subject.....	16
16	Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information	16
17	Applicable Forms.....	16
	PAIA Forms	16
	Form 01: Request for a Copy of the Guide from an Information Officer [Regulation 3]	16
	Form 02: Request for Access to Record [Regulation 7].....	16
	Form 03: Outcome of Request and of Fees Payable [Regulation 8]	16
	Form 05: Complaint Form [Regulation 10].....	16
	Form 13: PAIA Request for Compliance Assessment Form [Regulation 14(1)]	16
	POPIA Forms.....	17
	Form 1: Objection to the Processing of Personal Information	17
	Form 2: Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information	17
	Form 3: Application for the Issue of a Code of Conduct	17
	Form 4: Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing.....	17
	Form 5: Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing.....	17
18	Updating of the Manual	17

1 Definitions

Term	Definition
CEO	Chief Executive Officer
Client	Any natural or juristic person that received or receives services from the company
Complainant	Any person who lodges a complaint with the Information Regulator
Complaint	(a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator
Conditions for Lawful Processing	The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual
Data Subject	The person to whom Personal Information relates
Day	A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)
DIO	Deputy Information Officer
Information Officer/IO	The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA
Manual	This manual
Minister	Minister of Justice and Correctional Services
Office Hours	(a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate
PAIA	The Promotion of Access to Information Act, No. 2 of 2000
Personal Information	Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers
Personnel	Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors
POPI/POPIA	The Protection of Personal Information Act, No. 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI
Private Body	(a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction
Regulator	Information Regulator established in terms of POPIA
Republic	Republic of South Africa
Signature	Any legally accepted form of signature, including electronic signature where applicable
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2 Purpose of the PAIA Manual

This PAIA Manual is useful for the public to:

- 2.1 The PAIA Manual serves as a public guide to the information held by the organisation and how it can be accessed. It outlines the categories of records available without a formal request, the subjects on which records are maintained, and details of records accessible under other legislation. The manual also provides the official contact details of the Information Officer (IO) and Deputy Information Officer (DIO), who are responsible for assisting the public in exercising their right of access.
- 2.2 The manual further explains how to use the PAIA process and where to obtain the official guide published by the Regulator. It describes whether and how the organisation processes personal information, including the purposes of processing, the categories of data subjects involved, and the recipients (local or international) to whom such information may be supplied. The manual further confirms that appropriate security safeguards are in place to protect the confidentiality, integrity, and availability of personal information.

3 Contact Details for Access to Information Requests

3.1 Information Officer

Name	Baden Martin
Contact number	010 593 0551
Email address	michelle@cargobarnlogistics.co.za

3.2 Deputy Information Officer

Name	Michelle Berry
Contact number	010 593 0551
Email address	michelle@cargobarnlogistics.co.za

3.3 Head Office

Postal address	1 Spartan Road, Isando, Kempton Park, 1619.
Physical address	1 Spartan Road, Isando, Kempton Park, 1619.
Contact number	010 593 0551
Email	michelle@cargobarnlogistics.co.za
Website	https://cargobarnlogistics.co.za/

4 Guide on how to use PAIA and how to Obtain Access to the Guide

- 4.1 The Information Regulator has published a revised PAIA Guide in terms of section 10(1) of PAIA (as amended). This guide is designed to help any person who wishes to exercise rights under PAIA or POPIA, and it is available in all official languages as well as in braille to ensure accessibility.
- 4.2 The Guide serves two key purposes:

- 4.2.1. Access to Personal Information (POPIA): It explains how individuals (data subjects) can exercise their rights to request confirmation of whether personal information is held about them, to access that information (including details of third-party recipients), and to request correction, deletion, or destruction of personal information that is inaccurate, outdated, excessive, or unlawfully obtained.
- 4.2.2. Access to Records (PAIA): It provides step-by-step guidance on how to request records from public or private bodies, including the required forms, the process for appeals or complaints, and how to approach a court if necessary.

4.3 In addition, the Guide offers:

- 4.3.1. An overview of the objectives of PAIA and POPIA.
- 4.3.2. Contact details of Information Officers (IOs) and Deputy Information Officers (DIOs).¹
- 4.3.3. Manner and form of a request for access to a record of a public body and private body.²
- 4.3.4. Guidance on compiling or accessing PAIA Manuals.³
- 4.3.5. Information on voluntary disclosures of records, prescribed access fees, and applicable regulations.⁴
 - 4.3.5.1 How to lodge an internal appeal, a complaint with the Regulator or apply to court for a against a decision by the IO 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.
- 4.3.6. Insight into how PAIA has been amended following the implementation of POPIA.

4.4 The guide can also be obtained:

- 4.4.1 Upon request to the IO: [Request for a Copy of the Guide from an Information Officer \[Regulation 3\]](#)
- 4.4.2 From the website of the Regulator: www.inforegulator.org.za
- 4.4.3 From the offices of the Regulator: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg OR by email: enquiries@inforegulator.org.za

4.5 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:

- 4.5.1 English.
- 4.5.2 Afrikaans.
- 4.5.3 Zulu.

5 Latest Notices in terms of Section 52(2) of PAIA

At this stage, no notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

6 Availability of Certain Records in terms of PAIA

¹ Section 56(a) of POPIA - Every public and private body must, in line with section 17 of PAIA, appoint as many Deputy Information Officers as needed to carry out the duties and responsibilities set out in section 55(1) of POPIA.

² In terms of PAIA, access to records of a public body (section 11) or a private body (section 50) must be granted if the requester meets PAIA's procedural requirements, the request is necessary for exercising or protecting a right (in the case of private bodies), and no grounds for refusal in Chapter 4 apply.

³ In terms of sections 14 and 51 of PAIA, the Information Officer of every public and private body must update and publish their PAIA manual at least once every 12 months.

⁴ In terms of PAIA, public and private bodies must keep their PAIA manuals (sections 14 and 51) and notices (sections 15 and 52) updated and published at least once every 12 months. When access to a record is granted, the notice must also state any access fee payable by the requester (sections 22 and 54). In addition, the Information Regulator must update and publish the official PAIA Guide at least once every two years (section 92(11)).

6.1 Categories of records of the company which are available without a person having to request access:

Category of Records	Types of the Record	Available on Website	Available on Request
PAIA Manual	Current PAIA Manual with version and effective date	Yes	Yes
Company overview	Company profile, wholesale road-freight model, national footprint, head office contact details	Yes	Yes
Services and capabilities	Linehaul and regional distribution, collections and deliveries via partner network, service standards, POD description	Yes	Yes
Running schedule	Published "Running Schedule 2025" lanes or timing overview	Yes	Yes
Policies public facing	Privacy Policy, Cookies Policy, Website Terms and Conditions	Yes	Yes
Legal disclosures	POPIA section 18 notice, PAIA statements, website disclaimers and consumer notices	Yes	Yes
FreightGuard service-guarantee materials	Service Guarantee Terms and Conditions, claims process, evidence requirements, limits	Yes	Yes
Public marketing materials	Capabilities overview, brochure copy, lane highlights, non-identifying case snapshots	Yes	Yes
Tender or supplier onboarding info	Generic vendor forms, B-BBEE certificate copy, bank confirmation letter where appropriate	Yes	Yes
Corporate identifiers	Registered name, registration number, registered address, VAT number	No	Yes
Information Officer contacts	IO and DIO names, roles, email addresses, contact numbers	Yes	Yes
Training attestations aggregated	POPIA and PAIA awareness completion, HSE induction completion, no personal data	No	Yes
Health and safety statements	HSE policy for depot access and site safety, PPE requirements, incident reporting statements	Yes	Yes
Data and reporting descriptions	High-level data flows for tracking and POD, categories of operational data, system locations, retention brackets without client data	No	Yes
Whistleblowing and complaints	Confidential complaint routes, POPIA and PAIA complaint channels, escalation to the Information Regulator	Yes	Yes
IO registration proof	Information Officer and Deputy registration certificate or reference number	No	Yes
Company secretarial snapshot	Members' names as filed at CIPC, principal place of business	No	Yes

Category of Records	Types of the Record	Available on Website	Available on Request
Tax and compliance attestations	SARS TCS PIN, COID Letter of Good Standing, UIF and Workmen's Compensation proof	No	Yes
Insurance confirmations	Public liability summary, limits, insurer, validity dates	No	Yes
Supplier Code of Conduct	Ethics, anti-bribery, gifts and hospitality, conflict of interest, supplier obligations	Yes	Yes
Standard procurement info	Onboarding steps, required documents checklist, payment terms summary	Yes	Yes
Careers and recruitment	Vacancies, application process, candidate privacy notice	Yes	Yes
CSR	Community initiatives and partnerships	Yes	Yes

6.2 Description of the records/subjects of the company which are available in accordance with any other legislation:

Category of Records	Applicable Legislation
Memorandum of Incorporation or Founding Documents, CIPC filings, member or board minutes, statutory registers	Companies Act, 71 of 2008. Close Corporations Act, 69 of 1984
Beneficial ownership register, filings, access log	Companies Regulations, 2011 as amended by the Companies Amendment Regulations on Beneficial Ownership, 2023 under the Companies Act, 71 of 2008
Director and prescribed officer disclosures, conflict registers, resolutions	Companies Act, 71 of 2008
Client service agreements, service terms, complaints, returns, service levels	Consumer Protection Act, 68 of 2008
PAIA Manual, access request log, decision register, fees, training logs	Promotion of Access to Information Act, 2 of 2000
Data subject notices, consent records, operator agreements	Protection of Personal Information Act, 4 of 2013
Security policies, access controls, breach register, Regulator notifications	Protection of Personal Information Act, 4 of 2013, sections 19 to 22
Data subject rights register, outcomes, response packs	Protection of Personal Information Act, 4 of 2013, sections 23 to 25

Category of Records	Applicable Legislation
Cross border transfer assessments and safeguards	Protection of Personal Information Act, 4 of 2013, section 72
DIO designations and revocations, IO registration proof	Regulations under the Protection of Personal Information Act, 4 of 2013; outputs from the Information Regulator e-services
Electronic communications policies, e-signature consents, website terms	Electronic Communications and Transactions Act, 25 of 2002
Employment contracts, attendance, overtime, payroll, leave	Basic Conditions of Employment Act, 75 of 1997
Disciplinary and grievance files, union correspondence, CCMA case files	Labour Relations Act, 66 of 1995
Employment Equity plan, annual EE reports, committee minutes	Employment Equity Act, 55 of 1998
Recruitment ads, shortlists, background screening outcomes	Employment Services Act, 4 of 2014. Protection of Personal Information Act, 4 of 2013
UIF declarations, contribution records, benefit claims	Unemployment Insurance Act, 63 of 2001
Skills plans, annual training reports, learnership agreements	Skills Development Act, 97 of 1998
Levy declarations, SETA registrations, grant records	Skills Development Levies Act, 9 of 1999
PAYE, IRP5, EMP201, EMP501, tax directives	Income Tax Act, 58 of 1962. Tax Administration Act, 28 of 2011
VAT returns, input and output schedules, SARS correspondence	Value-Added Tax Act, 89 of 1991
Customer billing files, EFT proofs, reversal records	National Payment System Act, 78 of 1998
COIDA registration, Return of Earnings, Letter of Good Standing, IOD claims	Compensation for Occupational Injuries and Diseases Act, 130 of 1993
OHS policy, risk assessments for depots and handling, incident reports, safety minutes	Occupational Health and Safety Act, 85 of 1993 and regulations

Category of Records	Applicable Legislation
Public liability schedules, endorsements, notifications	Insurance Act, 18 of 2017
B-BBEE certificate, ownership, skills, supplier and enterprise development evidence	Broad-Based Black Economic Empowerment Act, 53 of 2003 and Codes of Good Practice
Fleet files, driver licences and PDPs, vehicle licences, logbooks, accident files	National Road Traffic Act, 93 of 1996. Road Accident Fund Act, 56 of 1996
Customs entries, manifests, bonded movements where applicable	Customs and Excise Act, 91 of 1964

- 6.3 The company keeps certain records as required by PAIA and POPIA:
- 6.3.1 PAIA records: PAIA Manual, official guides, submission records, and awareness training materials.
 - 6.3.2 POPIA records: Information Officer registration certificate, data breach records, retention records, and awareness training materials.
 - 6.3.3 Other relevant information may also be made available on request.
- 6.4 The tabulated records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

7 Request Process

An individual who wishes to place a request must comply with all the procedures laid down in PAIA:

7.1. Initiating the request

- 7.1.1. Use the prescribed form
 - All requests must be made on the prescribed form (**Form 2 – Request for Access to Record [Regulation 7]**) - [Request for Access to Record \[Regulation 7\]](#)
 - Additional prescribed forms include:
 - **Form 2 – Request for Correction or Deletion** (section 24 of POPIA). This form is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data. - [Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information](#)
 - **Form 3 – Application for a Code of Conduct** (section 61 of POPIA). This form is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing. - [Application for the Issue of a Code of Conduct](#)
 - **Form 4 – Request for Consent for Direct Marketing** (section 69 of POPIA). This form enables a responsible party to formally request a data subject’s consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS,

email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to. - [Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing](#)

- **Form 5 – Complaint Regarding Interference with Personal Information.** This form (Information) allows a data subject or complainant to submit a complaint to the Regulator concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations. - [Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing](#)

7.1.2. Requests not submitted on the prescribed form may be rejected.

7.1.3. Assistance in the request process:

- If a requester is illiterate or disabled, they may make the request orally to the IO, who must complete the prescribed form on their behalf and provide them with a copy (section 18(3) of PAIA).
- The IO must provide reasonable assistance to any requester who requires help in completing the form or understanding the procedure.

7.2. Particulars of the Request

7.2.1. The request must provide sufficient detail to enable the IO to identify and process it. This includes:

- A clear description of the record(s) requested.
- Full identity of the requester, with proof of identity where required.
- The preferred form of access (inspection, copy, electronic copy, etc.).
- The requester's contact details (postal, physical, fax or email).
- A statement that the record is required to exercise or protect a right, specifying the nature of that right and explaining why the record is necessary.
- If a request is made on behalf of another person, proof of authorisation must be attached.

7.3. Submission of Requests

7.3.1. The completed form, together with proof of payment of the prescribed request fee (if applicable), must be submitted to the Information Officer (IO) at the Company.

7.3.2. Requests may be lodged by:

- Hand delivery to the physical address provided in this Manual;
- Postal delivery to the Company's registered address;
- Fax; or
- Email to the address of the IO or DIO.

7.3.3. Where applicable, the IO may require a deposit in terms of section 22(2) of PAIA where search and preparation is expected to be time-consuming.

7.4. Fees and Timeframes for Response

7.4.1. Requests will be processed and responded to within 30 (thirty) calendar days of receipt.

7.4.2. In terms of section 26 of PAIA, the IO may extend this period once, by up to 30 additional days, if:

- The request involves a large number of records;

- Consultation with third parties is required; or
 - The records are located in another office and cannot reasonably be obtained within 30 days.
- 7.4.3. If an extension is required, the requester will be notified in writing, with reasons for the extension.
- 7.4.4. A request fee may be charged for non-personal requests.
- 7.4.5. If the search and preparation of the record will exceed six (6) hours, the requester may be required to pay a deposit of up to one-third of the estimated fee.
- 7.4.6. Access will only be granted once all required fees have been paid.

7.5. Outcome of Request

- 7.5.1. The IO will notify the requester in writing, using **Form 3 - [Outcome of Request and of Fees Payable \[Regulation 8\]](#)**, of the decision to grant or refuse access.
- 7.5.2. If access is granted, the notice will:
- Specify the form of access; and
 - State the applicable access fees payable before access is given.
- 7.5.3. If access is refused, the notice will set out the grounds for refusal as provided in Chapter 4 of PAIA.

7.6. Appeals and Complaints

- 7.6.1. If access is refused or deemed refused (i.e. no decision within the prescribed period), the requester may:
- Lodge an internal appeal (for public bodies); or
 - Refer the matter to the Information Regulator or approach a court of law (for private bodies).
- 7.6.2. The Regulator can be contacted using the details provided in this Manual.

8 Grounds for Refusal

In terms of Chapter 4 of PAIA, the company may refuse a request for access to records on the following grounds (unless an exception applies):

- 8.1 **Privacy of individuals** - To protect the personal information of a third party (including deceased persons) where disclosure would be unreasonable.
- 8.2 **Commercial interests of third parties** - Records may be refused if they contain:
- Trade secrets;
 - Financial, commercial, scientific, or technical information, where disclosure could cause harm; or
 - Information provided in confidence, where disclosure could disadvantage or prejudice the third party in negotiations or competition.
- 8.3 **Confidentiality agreements** - Information that is protected under a contract or agreement with a third party.
- 8.4 **Safety and security** - Records that could endanger the life, health, or safety of a person, or the protection of property.
- 8.5 **Legal privilege** - Records that would be privileged from disclosure in legal proceedings.
- 8.6 **Commercial interests of the company** - Records may be refused if they contain:
- Trade secrets;
 - Financial, commercial, scientific, or technical information that could harm the company's interests;
 - Information that could prejudice the company in negotiations or competition; or

- Proprietary computer programs protected by copyright or intellectual property law.

8.7 **Research information** - Where disclosure would place ongoing research or a researcher at a serious disadvantage.

8.8 **Frivolous or unreasonable requests** - Requests that are clearly frivolous, vexatious, or that would cause an unreasonable burden on company resources.

9 Remedies Should a Request be Refused

9.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.

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

10 Fees

The following fees shall be payable upon request by a requestor:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Base/starting rate to search for and prepare the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Rate to search for and prepare the record for disclosure	R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)
Postage, email or any other electronic transfer	Actual expense, if any

11 Processing of Personal Information

- 11.1 The company processes personal information in accordance with the conditions for lawful processing as set out in the Protection of Personal Information Act, 4 of 2013 (“POPIA”). Personal information is processed only for legitimate business purposes, which may include (but are not limited to):
- 11.1.1 Employment-related purposes: Recruitment, administration of employment contracts, payroll, benefits, training, and compliance with labour laws.
 - 11.1.2 Client and supplier management: Entering into and performing contracts, maintaining relationships, processing payments, and responding to queries or complaints.
 - 11.1.3 Legal and compliance obligations: Compliance with statutory and regulatory requirements, record keeping, audits, and reporting.
 - 11.1.4 Security and risk management: Protecting company property, monitoring access, preventing fraud, and ensuring the safety of staff, clients, and visitors.
 - 11.1.5 Marketing and communication: Providing information about products or services, subject to obtaining the necessary consent under POPIA.
- 11.2 The company ensures that personal information is processed lawfully, reasonably, and only for the purposes for which it was collected and takes appropriate steps to protect the confidentiality and integrity of such information.
- 11.3 Description of the categories of data subjects and of the information or categories of information relating thereto:
- 11.3.1. The company processes personal information relating to various categories of data subjects. The categories of data subjects, and the types of personal information that may be processed in respect of each, include (but are not limited to) the following:

Categories of Data Subjects	Personal Information that may be Processed
Customers and corporate clients	Names, work titles, business contact details, company identifiers, CIPC numbers, contract records, rate cards, orders, consignments, delivery addresses, proof of delivery artefacts, invoices, payment history, bank details, credit vetting outcomes, service tickets, communications, audit trails.
Prospective clients and leads	Names, business contact details, role, lead source, meeting notes, requests for quotation, proposals, communications, opt-in and opt-out preferences.
Retailer contacts and store personnel	Names, store and chain identifiers, role, site access windows, center or retailer permits, induction confirmations, sign-off records, incident acknowledgements, communications.
Suppliers and service providers	Entity details, registration and VAT numbers, B-BBEE certificate details, bank details, contact persons, contracts, security questionnaires, data processing agreements, performance records, incident and service credits.
Contractors and subcontractors	Company and contact details, scope of work, permits, inductions and safety confirmations, access control entries, incident logs, invoices, communications.
Employees	Names, identity numbers, contact details, demographics, next of kin, contracts, performance records, time and attendance, payroll and tax data, benefits, disciplinary records, training and induction completion,

	device assignments, location logs when enabled, incident and injury files, medical fitness certificates where required by site rules.
Promoters, merchandisers, field staff	Names, identity numbers, contact details, route plans, rosters, device identifiers, photo audit uploads, GPS and timestamps, centre permits, retailer inductions, uniform and PPE issue, incentive and commission records, age verification for alcohol promotions.
Drivers	Names, license and PDP details, contact details, vehicle assignments, telematics and GPS logs, proof of delivery signatures, incident and accident reports, infringement records, substance testing results where required by law.
Job applicants	Names, contact details, CVs, qualifications, work history, references, background screening outcomes, right-to-work records, interview notes, assessment results.
Competition entrants and prize winners	Names, contact details, entry data, proof of age, proof of purchase where required, winner verification records, delivery details, publicity consents. Children's data only with guardian consent.
Website users and online portal users	Names and contact details submitted via forms, device and browser identifiers, IP addresses, timestamps, basic analytics, cookie preferences, user account activity, support queries.
Social media users	Profile names, public handles, public posts directed at the company, direct messages relevant to service or promotions, engagement metrics.
Office visitors and CCTV subjects	Names, ID or visitor card details, access logs, CCTV images and video, vehicle registration for parking, escort logs, incident notes.
Shareholders, directors, prescribed officers	Names, identity numbers, contact details, shareholding or membership details, appointments, CIPC filings, beneficial ownership particulars, conflict registers.
Mall and centre management contacts	Names, roles, contact details, permit and induction confirmations, correspondence on store access and safety, incident coordination notes.
Government and regulatory officials	Names, role and institution, contact details, correspondence, inspection or enquiry records, notices and directives.
General public and other stakeholders	Information provided in emails, calls, surveys, or events. Names, contact details, signatures for acknowledgements, and the minimum content required for business or legal purposes.

12 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

12.1 Personal information held by the company may be disseminated to third parties only when lawful and necessary for business, contractual, or regulatory purposes. Categories of personal information and possible recipients include (but are not limited to):

Category of Personal Information	Recipients or Categories of Recipients
Identity numbers, names, business and personal contact details	Government departments and regulatory authorities. Law enforcement. Auditors. Banks and payment processors for KYC where required. Retailers and shopping center management for access permits and inductions. Courier partners for document or prize delivery. The Information Regulator for statutory submissions.

Qualifications, licenses, and professional history	SAQA. Professional bodies. Background screening providers. Recruitment service providers. Client audit teams where contractually required.
Credit and payment history	Registered credit bureaus. Banks and payment processors. External accountants. Debt collection agencies where applicable.
Tax and payroll records	SARS. Payroll providers. Pension or provident fund administrators. Medical aid and employee benefit providers. UIF and COID administrators.
Health and safety information	Occupational health practitioners. Medical aid providers. Workmen's Compensation authorities. Retailer or centre safety officers for incident escalation. Insurers and loss adjusters.
Contractual and business information	Clients. Insurers. Legal advisors. Auditors. Consultants. Delivery and road-freight subcontractors. Promotional agencies. Retailers and centre management for operational coordination.
B-BBEE credentials and supplier data	Verification agencies. Client and retailer procurement departments. Industry portals where tendering requires disclosure.
Training and induction records	Retailers and centre management for access approval. SETA bodies for learnerships and grants. Clients where contractually agreed. Auditors.
Direct marketing preferences and contact data	Email and SMS service providers. Campaign management vendors. Suppression list partners to honour opt-outs.
Promotional competition entries and winner data	Independent auditors. Prize fulfilment partners. Courier services. Retailers for in-store verification. Regulators if required under CPA promotional rules.
CCTV footage, access control logs, visitor registers	Security service providers. Centre security. Insurers. Law enforcement on request. Forensic investigators.
Fleet, telematics, route and incident data	Telematics providers. Fleet insurers. Accident investigators. AARTO enforcement authorities. Panel beaters and tow services.
Financial records, invoices, bank details	Banks. External accountants. Auditors. Payment processors. Clients and suppliers for reconciliation.
Digital and IT records including user IDs, device IDs, logs, backups	Cloud hosting providers. Managed IT and cybersecurity vendors. SaaS analytics providers. Incident response partners.
Data protection governance records including ROPA, operator agreements, breach logs	Information Regulator. Clients in their capacity as responsible parties. Legal counsel. Insurers for cyber coverage.
Procurement and vendor onboarding packs	Due-diligence providers. Screening databases. Client procurement teams. Group legal and risk.
Shareholder, director, and beneficial ownership details	CIPC. Banks for KYC. Auditors. Verification agencies where required by tender rules.

13 Planned Transborder Flows of Personal Information

- 13.1 The company may, where necessary and lawful, transfer or store personal information outside the Republic of South Africa. This could include, for example, the use of secure cloud-based service providers or international business partners. Where no transborder transfer is required, personal information will continue to be stored and processed within South Africa.
- 13.2 Any cross-border transfer of personal information will only take place in accordance with section 72 of POPIA, which requires that:
- 13.2.1 The recipient country, organisation, or international organisation is subject to a law, binding agreement, or corporate rules that provide an adequate level of protection; or

13.2.2 The transfer is necessary for the performance of a contract, with the consent of the data subject, or for another lawful reason recognised by POPIA.

14 Availability of the PAIA Manual at the Company

14.1 A copy of the manual is available:

14.1.1 On the website or at any head office for public inspection during normal business hours;

14.1.2 To any person upon request and upon the payment of a reasonable prescribed fee; and

14.1.3 To the Information Regulator upon request.

14.2 A fee for a copy of the manual, as contemplated in the Regulations, shall be payable per each A4-size photocopy made.

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

15.1 Any person (“data subject”) has the right to object to the processing of their personal information in terms of section 11(3) of POPIA.

15.2 An objection must be made on **Form 1 – [Objection to the Processing of Personal Information](#)** or a similar form. This is free of charge and can be sent by hand, post, fax, email, SMS, WhatsApp, or any other convenient method.

15.3 When personal information is collected, the company must inform the data subject of their right to object.

15.4 If an objection is made by phone, the company must record it electronically and provide a copy or written transcript to the data subject on request, at no cost.

16 Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

16.1 A data subject has the right, under section 24 of POPIA, to request the correction, destruction, or deletion of their personal information at any time and free of charge.

16.2 Correction or deletion may be requested if the personal information is:

16.2.1 Inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained;
or

16.2.2 No longer lawfully permitted to be kept by the company.

16.3 Requests must be made using **Form 2 – [Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information](#)** or a similar form. This can be submitted free of charge by hand, post, fax, email, SMS, WhatsApp, or any other convenient method.

16.4 If a request is made by phone, the company must record it electronically and provide a copy or written transcript to the data subject on request, at no cost.

16.5 The company must respond within 30 days of receiving the request and notify the data subject in writing of the outcome and any action taken.

17 Applicable Forms

PAIA Forms

Form 01: [Request for a Copy of the Guide from an Information Officer \[Regulation 3\]](#)

Form 02: [Request for Access to Record \[Regulation 7\]](#)

Form 03: [Outcome of Request and of Fees Payable \[Regulation 8\]](#)

Form 05: [Complaint Form \[Regulation 10\]](#)

Form 13: [PAIA Request for Compliance Assessment Form \[Regulation 14\(1\)\]](#)

POPIA Forms

- Form 1:** [Objection to the Processing of Personal Information](#)
- Form 2:** [Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information](#)
- Form 3:** [Application for the Issue of a Code of Conduct](#)
- Form 4:** [Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing](#)
- Form 5:** [Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing](#)

18 Updating of the Manual

The head of the company will update this manual on a regular basis.

Name of IO	Baden Martin
Title of the head of the body	Managing Member