

PBT HOLDINGS LIMITED

PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

www.pbtholdings.co.za

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1 INTRODUCTION

This manual has been prepared in accordance with the requirements of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA"). The purpose of this manual is to inform requesters of the procedural and substantive aspects of how to access records held by PBT Holdings.

2 CONTACT DETAILS

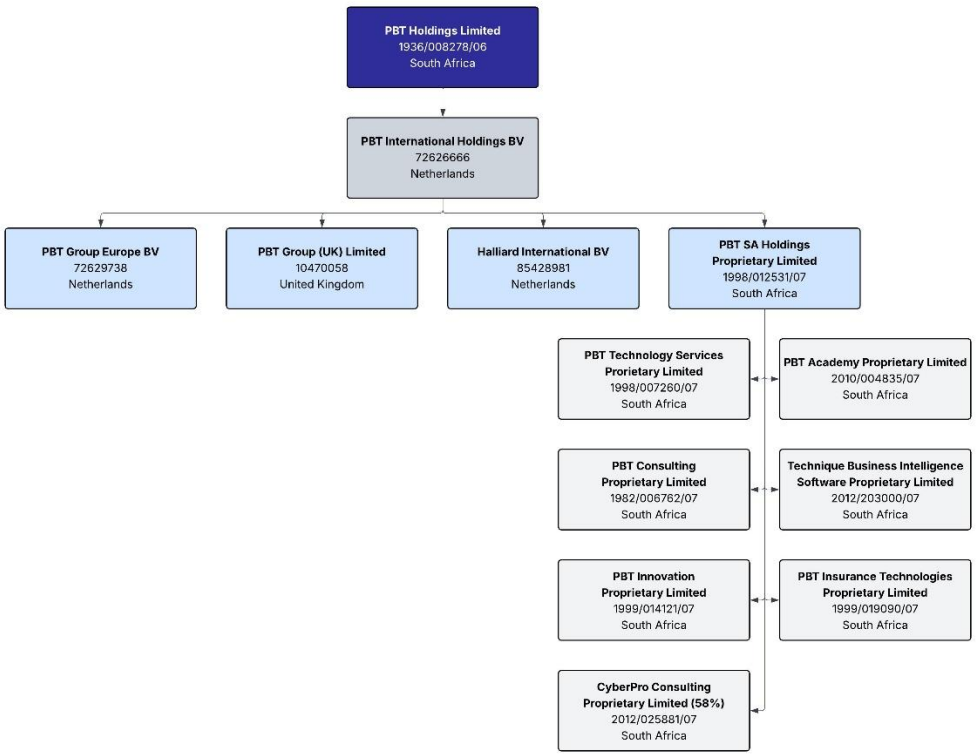
Head of the organisation:	Elizna Read
Point of contact:	Pieter Carstens
Postal address:	PO Box 276, Century City, 7446
Physical address:	PBT House, 2 Mews Close, Waterford Mews, Century City, 7441
Telephone number:	+27 (0)21 551 0937
E-mail address:	pieter.carstens@pbtgroup.co.za

3 GUIDE ON HOW TO USE PAIA

A guide to assist users in understanding how to exercise their rights under PAIA is available from the South African Human Rights Commission (SAHRC). You may obtain more information about PAIA when accessing the published PAIA Guide. Additionally, you may direct any queries regarding PAIA to the South African Human Rights Commission (SAHRC), PAIA unit:

Postal Address:	Private Bag 2700, Houghton, 2041
Telephone Number:	+27 (0) 11 877 3600
Fax Number:	+27 (0) 11 403 0625
Website:	www.sahrc.org.za

4 CORPORATE STRUCTURE



5 RECORDS AVAILABLE PUBLICLY

The following records are available without request on the PBT Holdings website https://www.pbtholdings.co.za/:

- Marketing material:
  - Articles
- Policies:
  - Privacy policy
  - Gender and race diversity policy
- Broad-Based Black Economic Empowerment compliance documentation:
  - B-BBEE compliance report
- Investor information:
  - SENS announcements
  - Annual financial statements
  - Interim results
  - Circulars
  - Material risk register

6 RECORDS AVAILABLE ON REQUEST

In addition to the above information which is publicly available, the following records are held by PBT Holdings and available on request. Such requests shall be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

6.1 STATUTORY COMPANY INFORMATION

- Memorandum of incorporation
- Record of directors
- AGM minutes
- Board and committee meeting minutes and resolutions
- Share register

6.2 HUMAN RESOURCES INFORMATION

- Employment agreements
- Employee personal information
- Education and training records
- Performance evaluations
- Disciplinary records
- Medical records
- HR policies and procedures

6.3 INFORMATION TECHNOLOGY INFORMATION

- Business continuity and disaster recovery plans
- IT policies and procedures
- Software licenses

6.4 FINANCIAL INFORMATION

- Banking records
- Accounting records
- Tax records
- Supplier records
- Asset register

6.5 CLIENT INFORMATION

- Contractual agreements
- Client correspondence

To request access to any of the records mentioned above, please complete the prescribed PAIA request Form 2 and submit it to the Information Officer using the contact details provided in section 2.

7 RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

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

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 61 of 1973
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Copyright Act 98 of 1978
- Electronic Communications and Transactions Act 25 of 2002
- Electronic Communications Act, 36 of 2005
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health & Safety Act 85 of 1993
- Prevention of Organised Crime Act 121 of 1998
- Prevention and Combating of Corrupt Activities Act 12 of 2004
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protected Disclosures Act 26 of 2000
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Stock Exchanges Control Act 1 of 1985 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 30 of 1966
- Value Added Tax Act 89 of 1991
- Such other legislation as may be applicable from time to time.

8 PROCESSING OF PERSONAL INFORMATION

8.1 PURPOSE OF THE PROCESSING OF INFORMATION

The purpose of processing personal information is critical to ensure transparency and trust between the responsible party and the data subjects. The objectives may include, but are not limited to:

- Service delivery: To provide and improve services or products offered by the responsible party.
- Legal compliance: To comply with statutory obligations and legal requirements.
- Customer relations: To manage and maintain relationships with clients, including communication and marketing.
- Operational efficiency: To facilitate operational activities such as HR management, IT administration and financial management.
- Security: To ensure the security of data, systems and facilities.

8.2 Description of the Categories of Data Subjects and Information

8.2.1 Categories of Data Subjects

- Clients: Individuals who utilise our services.
- Employees: Current and former employees, including contractors.
- Suppliers and business partners: Entities or individuals providing goods or services.
- Stakeholders: Shareholders, board members and other stakeholders.
- Website visitors: Individuals who visit the organisation's website.

8.2.2 Categories of Information

- Personal identification information: Names, ID numbers and passport numbers.
- Contact information: Phone numbers, e-mail addresses and physical addresses.
- Financial information: Bank details, and financial statements.
- Employment information: Employment history, salary details and performance reviews.
- Health information: Medical records, health status (where applicable).
- Behavioral information: Preferences and website activity.

8.3 Recipients or Categories of Recipients

Personal information may be supplied to various recipients under specific conditions. These recipients include:

- Internal departments: HR, IT, Finance and Business Development.
- Service providers: Background and verification checks, payroll processing, etc.
- Regulatory authorities: Government bodies and regulatory authorities as required by law.
- Business partners: Clients, partners, affiliates and collaborators.
- Legal advisors: Attorneys and legal counsel involved in legal proceedings or advisory.
- Financial institutions: Banks and financial institutions.

8.4 Planned Transborder Flows of Personal Information

When personal information is transferred across borders, the responsible party must ensure adequate protection measures are in place. This includes:

- Data transfers to trusted jurisdictions: Ensuring data is transferred to countries with data protection laws that provide similar or adequate levels of protection.
- Standard contractual clauses: Implementing standard data protection clauses in agreements with foreign recipients.
- Binding corporate rules: Establishing binding corporate rules for intragroup international data transfers.
- Informed consent: Obtaining explicit consent from data subjects for international data transfers when necessary.

8.5 General Description of Information Security Measures

To ensure the confidentiality, integrity and availability of personal information, the responsible party must implement robust information security measures. These measures include:

- Access controls: Implementing strict access control mechanisms to ensure only authorised personnel can access sensitive information.
- Data encryption: Utilising encryption techniques for data at rest and in transit to prevent unauthorised access.
- Regular audits: Conducting regular security audits and vulnerability assessments to identify and mitigate risks.
- Incident response plan: Establishing a comprehensive incident response plan to address and manage data breaches or security incidents.

- Employee training: Providing regular training to employees on data protection principles, security protocols and privacy awareness.
- Physical security: Ensuring physical security measures such as secured server rooms, access logs, and surveillance are in place.

These measurements outline the fundamental aspects of the (Protection of Personal Information Act POPIA) as they pertain to the processing of personal information. Adhering to these guidelines will help ensure compliance with legal requirements and foster trust with data subjects by safeguarding their personal information.

9 Request Procedure

9.1 Form of Request

Requests for access to information must be made using the prescribed Form 2.

9.2 Submission of Requests

Completed request forms can be submitted via:

E-mail:	pieter.carstens@pbtgroup.co.za
Postal address:	PO Box 276, Century City, 7446
Physical submission:	PBT House, 2 Mews Close, Waterford Mews, Century City, 7441

9.3 Fees

A request fee of R100 is payable by the requester, and additional fees may be charged for the reproduction and delivery of the records. The Information Officer will inform the requester of the applicable fees upon receipt of the request.

9.4 Decision on Request

The Information Officer will respond to the request within 30 days, indicating whether the request has been granted or refused. The outcome will be communicated through the use of and in accordance with the format of Form 3. If the request is granted, the Information Officer will provide details on how to access the records. If the request is refused, reasons for the refusal will be provided.

10 Remedies

If a request for access to records is refused, the requester has the right to lodge an internal appeal through the use of Form 4. An internal appeal must occur before a challenge can be made to the Information Regulator or to a court having jurisdiction.

11 Availability of the Manual

This manual is available for inspection at our offices during normal business hours, free of charge. Copies can also be requested from the Information Officer.

12 Amendments to the Manual

This manual will be updated regularly to reflect any changes in the organisation or in accordance with legal requirements. The latest version will be available on our website and at our offices.