



Manual prepared in terms of Section 51 of the Protection of Access to Information Act, 2000 (“PAIA”) and Section 55 of the Protection of Personal Information Act, 2013 (“POPIA”). It provides information on how Deltrolux collects, stores, processes, and grants access to personal information in compliance with South African data protection laws.

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1. Overview

- 1.1. **DELTROLUX** (PTY) LTD, the “Company”, is committed to protecting the privacy and security of your personal information.
- 1.2. This manual has been compiled in accordance with Section 51 of the Promotion of Access to Information Act No. 2 of 2000 (“PAIA”) that requires us to provide the public with information regarding the personal data held by the Company and the procedures we have put in place to safeguard all information held by us in balancing your right to privacy and societies need to access and to use your personal information for legitimate purposes, such as to enable us to do our work for you.
- 1.3. On the other hand, this manual describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the Protection of Personal Information Act (“POPIA”) and any applicable privacy law.
- 1.4. **DELTROLUX** is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this manual. This information is also used by our affiliated entities and group companies, and so, in this manual, references to “we” or “us” means the Company and our group companies.
- 1.5. The goal of the manual is to ensure that potential suppliers, affiliates and requesters, who intend to obtain documents or records from **DELTROLUX** in terms of PAIA, will handle your information with the same standard of care by providing them with the processes to be followed in initiating such requests, and further incorporating or addressing the requirements of POPIA.
- 1.6. It is important that you read and retain this manual, together with any other privacy policies we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

2. Application of this Manual

- 2.1. This Manual applies to the following persons:
 - 2.1.1. All DELTROLUX and its divisions/subsidiary companies’ employees, who for the purposes of this Manual will include permanent, fixed term and temporary employees, directors, interns, third party representatives, agents, sponsors and representatives who are carrying out work for or on behalf of the Company (“employees”); and



- 2.1.2. All operators, service providers, contractors and agents acting for or on behalf of the Company, provided they have been made aware of this Manual.
- 2.2. The rules and standards set out in this Manual applies to all personal data processed by the Company in an automated or non-automated manner, and regardless of how stored or recorded i.e. stored electronically, digitally, on paper or on other materials or through other methods.
- 2.3. All employees who process personal information on behalf of the Company are expected to comply with the Company's legal obligations in so far as they relate to the handling and processing of personal information, which has to be done in order to protect the Company from the risk of non-compliance, and the consequences of such non-compliance, including loss of data, investigations, administrative penalties, criminal charges and fines, civil claims and damages, as well as reputational risk.
- 2.4. All employees who process personal information on behalf of the Company must read, understand and comply with this manual when processing personal information in the course of performing their tasks and must observe and comply with all personal information controls, practices, protocols and training to ensure such compliance.
- 2.5. Compliance with this Manual and related company policies and procedures is mandatory.
- 2.6. Any breach of this Manual and related policies and procedures may result in disciplinary action and the necessary corrective action.

Name of Body:	DELTROLUX (PTY) LTD
Registration number:	2011/107032/07
CEO and Information Officer:	Dwayne-Lodi Kloppers
Deputy Information Officer:	Pierre Kapp
Postal address / Physical Address:	Office 8, Lords Office Park, Building 8, Centurion, 0157
Telephone number:	+27 87 151 0616
Email address:	popia@deltrolux.co.za
Website:	www.deltrolux.co.za

3. Contact details in terms of Section 51(1)(a) of PAIA

The Chief Executive Officer ("CEO") of Deltrolux Proprietary Limited is currently Mr Dwayne-Lodi Kloppers who has authorised himself as the official Information Officer and **Pierre Kapp** as the Deputy Information Officer of Deltrolux (Pty) Ltd who is tasked to receive and address



all requests for information that have been made in accordance with PAIA and POPIA.

Any requests for information in terms of PAIA must be directly addressed to Mr Kapp at www.deltrolux.co.za.

4. How to Request Information in terms of Section 51(1)(b) of PAIA

- 4.1. PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Requests in terms of PAIA must be made in accordance with the prescribed procedures, at the rates provided. The forms that apply are dealt with below in the Annexures of this Manual.
- 4.2. Section 23 of POPIA (read with sections 18 and 53 of PAIA), grants a requester the right to request confirmation of records containing their personal information held by the company, which confirmation must be provided for free of charge. The requester can subsequently request a copy of the record, or a description of the personal information contained within the record, subject to the fees prescribed by PAIA.
- 4.3. A PAIA Guide has been developed in fulfilment of the Information Regulator's ("Regulator's") obligation under section 10 of the PAIA, which requires the Regulator to update and make available the existing Guide that has been compiled by the South African Human Rights Commission. This Guide has been designed to be a guiding, user-friendly and accessible tool for any person who wishes to exercise any right contemplated in PAIA and POPIA.

5. Records we hold

- 5.1. Records which are freely available in terms of Section 51(1)(c) of PAIA
The following records are automatically available to the general public and need not be requested in accordance with the procedure outlined in this Manual:
 - 5.1.1. Brochures;
 - 5.1.2. Information available on DELTROLUX's website.
- 5.2. Records Available in Terms of PAIA:
Please refer to Annexure 1 hereto to review categories of records that are held by Deltrolux and available upon request.
- 5.3. Records Containing Personal Information (Subject to POPIA):
Please refer to Annexure 1 hereto to review the categories of personal information are processed and stored by Deltrolux
- 5.4. Records held by DELTROLUX in terms of other legislation in terms of Section 51(1)(d) of PAIA



DELTROLUX retains several records in accordance with legislation which applies to it, including but not limited to –

- 5.4.1. Basic Conditions of Employment Act, No. 75 of 1997;
- 5.4.2. Companies Act, No. 71 of 2008;
- 5.4.3. Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993;
- 5.4.4. Consumer Protection Act, No. 68 of 2008;
- 5.4.5. Copyright Act, No. 98 of 1978;
- 5.4.6. Electronic Communications and Transactions Act, No. 25 of 2002;
- 5.4.7. Employment Equity Act, No. 55 of 1998;
- 5.4.8. Financial Intelligence Centre Act, No. 38 of 2001;
- 5.4.9. Income Tax Act, No. 58 of 1962;
- 5.4.10. Labour Relations Act, No. 66 of 1995;
- 5.4.11. Medical Schemes Act, No. 131 of 1998;
- 5.4.12. National Credit Act, No. 34 of 2005;
- 5.4.13. Occupational Health and Safety Act, No. 85 of 1993;
- 5.4.14. Pension Funds Act, No. 24 of 1956;
- 5.4.15. Page 5 Protection of Personal Information Act, No.4 of 2013; Private Security Industry Regulatory Act, No 56 of 2001
- 5.4.16. Regulation of Interception of Communications and Provision of Communication Related Information Act, No. 70 of 2002;
- 5.4.17. Skills Development Act, No. 97 of 1998; Skills Development Levies Act, No. 9 of 1999;
- 5.4.18. Unemployment Insurance Act, No. 63 of 2001;
- 5.4.19. Value Added Tax Act, No. 89 of 1991.

Where any information contained in any records retained by DELTROLUX in terms of the above legislation is of a public nature, such records may be available for inspection without a person having to request access thereto in terms of PAIA.

6. Access to Records held by us

To facilitate the processing of a request, the requester must: -

- 6.1. Use the prescribed form attached to this Manual;
- 6.2. Address the request to the information officer or authorised person supplied within this Manual, and e-mail the request form as per provided details;
- 6.3. Provide sufficient particulars to enable the Information Officer of the organisation to identify the record/s requested;
- 6.4. the requester must indicate, in which form (mode/method) of access is required;



- 6.5. Specify a postal address or fax number of the requester;
- 6.6. Identify the right the requester is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right;
- 6.7. If the requester, in addition to a written reply, intends to be informed of the decision on the request in any other manner, state that manner and the necessary particulars to be so informed;
- 6.8. If the request is made on behalf of another person, submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the organisation.

7. Prescribed Fees

- 7.1. On request of access to information, the Information Officer, or duly authorised person, will by notice require the requester, other than a personal requester, to pay the prescribed fee as set out in PAIA before processing the request.
- 7.2. If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the authorised person shall notify the requester to pay as a deposit the prescribed portion of the access fee.
- 7.3. A requester, whose request for access has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangement to make it available in the request form.

8. Remedies Available to a Requester upon Refusal of Access

- 8.1. Internal remedies

DELTROLUX does not have any internal appeal procedures that may be followed, after a request to access information has been refused. As such, the decision made by the information officer, as approved by the CEO is final. Requestors will have to exercise such external remedies at their disposal if the request for information is refused and the requestor is not satisfied with the answer supplied by the information officer.
- 8.2. External remedies

A requester that is dissatisfied with an information officer's refusal to disclose information, may within 30 days of notification of the decision, apply to a competent Court for relief. Likewise, a third party that is dissatisfied with an information officer's



decision not to grant a request for information, may within 30 days of notification of the decision, apply to a competent Court for relief. For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court with similar status.

9. Request Procedure

- 9.1. The requester must comply with all the procedural requirements contained in PAIA, relating to the request for access to a record.
- 9.2. The requester must complete the prescribed form enclosed herewith in Annexure 2 and submit same as well as payment of a request fee (if applicable) and a deposit, where a request is made for access to information relating to a third party, to the Information Officer at the postal or physical address or electronic mail address as stated in paragraph 3 above.
- 9.3. The prescribed form must be completed with enough particularity to at least enable the Information Officer to identify the following:
 - 9.3.1. The record or records required by the requester;
 - 9.3.2. The identity of the requester and such person acting on behalf of the requester where applicable;
 - 9.3.3. What form of access is required, if the request is granted;
- 9.4. The telephone number, postal address or fax number of the requester (within the Republic of South Africa).

10. Data Protection Principles

- 10.1. **DELTROLUX** will comply with data protection laws and ensure that the relevant resources, systems and processes are in place to demonstrate compliance with our data processing obligations. In doing so we ensure you that:
 - 10.1.1. We will implement the appropriate technical and organisational measures specifically designed to ensure compliance with the data protection principles;
 - 10.1.2. only personal information that is necessary for each specific purpose is processed, both in relation to the nature, extent and volume of such personal data, the period of storage and the accessibility of the personal information;
 - 10.1.3. where any intended processing presents a high risk to the rights and freedoms of data subjects, the Company has carried out an assessment of those risks and is taking steps to mitigate those risks, by undertaking a 'Data Protection Impact Assessment';

- 10.1.4. data protection has been integrating into the Company's internal procedures and documents, by way of privacy policies and processing notices;
 - 10.1.5. the Company's directors, employees and those who process personal information on behalf of the Company will regularly receive training on the POPIA, this Manual and the Company's related policies and procedures, and maintaining a record of all such training; and
 - 10.1.6. the measures implemented by the Company are regularly tested and periodic reviews are conducted to assess the adequacy and effectiveness of this Manual, and the Company's related personal information policies and procedures which are applicable to the Company.
- 10.2. The personal information we hold about you must be:
- 10.2.1. Used lawfully, fairly and in a transparent way;
 - 10.2.2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
 - 10.2.3. Relevant to the purposes we have told you about and limited only to those purposes;
 - 10.2.4. Accurate and kept up to date;
 - 10.2.5. Kept only as long as necessary for the purposes we have told you about;
 - 10.2.6. Kept securely.

11. About the Information We Collect and Hold

- 11.1. A person (client, employee or third party) has the right to request access to their personal information in terms of Section 23 of POPIA. Personal information is information that relates to an identifiable, living individual. It also extends to personal information of an identifiable juristic person - such as a company or close corporation. The individual or juristic person is referred to as a data subject.
- 11.2. According to the definition of personal information it includes, but is not limited to, the information as withheld in Annexure 1 hereto.
- 11.3. Special personal information includes:
 - 11.3.1. A child who is subject to parental control in terms of the law, or
 - 11.3.2. A data subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life, biometric information or criminal behaviour
- 11.4. The processing of special personal information is generally prohibited by the POPIA, subject to certain exclusions. A higher degree of protection should be afforded to special personal information:



- 11.4.1. Special rules apply to the collection and use of special personal information;
 - 11.4.2. We may only process the personal information of a child if we have the consent of the child's parent or legal guardian;
 - 11.4.3. We will not process any of this special personal Information without the client's consent, or where this is necessary for the establishment, exercise or defence of a right or an obligation in law;
 - 11.4.4. Regarding the nature of our work, it is unlikely that we will have to process special personal information, except for the processing of personal information regarding race to comply with the Broad-Based Black Economic Empowerment Act No. 53 of 2003 and relating to our own employees to comply with legislative requirements and licensing conditions relating to the provision of financial services. Where necessary the guidance of the Information Officer, or Deputy Information Officers must be sought.
- 11.5. We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

12. How Is Your Personal Information Collected?

- 12.1. We will collect majority of your personal information from you, either by way of contract or website access. Please co-operate with us when we do so. We will also collect your personal information from another intermediary or receive it from a responsible party.
- 12.2. We will be collecting your personal information to enable us to fulfil the mandate or contractual obligations that we have been given by you or a responsible party. Refer to Annexure 1 below, which details the purposes for which we are required to collect and process personal information.
- 12.3. You are legally obliged to supply the information that we need to comply with the Financial Intelligence Centre Act No. 38 of 2001 ("FICA"). This information is required to combat money laundering and the financing of terrorism. We also require your tax number and other personal information to comply with reporting obligations to the South African Revenue Services (SARS) and your identity number/registration number, address, email address where available and banking details to comply with State Rules and Directives and the Companies Act. Any other information that we ask for, will be required to enable us to do our work. You have a choice as to whether you will supply us with this other information. Please note that if you fail to supply the

information we ask for, we will not be able to do our work properly. You might also be placing yourself in breach of a contract, or the law.

- 12.4. We will be passing your personal information on to all third parties that require it for the purposes of doing their work which is related to what we are doing for you. For example, if we are processing a dividend payment to fulfil the issuer's legal obligation to you and in terms of our contractual obligation with an issuer, we will need to share your personal information with the bank.
- 12.5. You can rest assured that unless we are legally obliged to share your personal information, we will only share so much of your personal information as is needed by the authority that requires it, and we will only do so when it is necessary for us to do our work for you. In addition, all our staff are bound by confidentiality clauses in their letters of employment.
- 12.6. If there is an international component to the work which we are doing for you, and if we are required to share your personal information with an overseas recipient, you are entitled to ask us how your personal information will be protected in this foreign country, and we will endeavour to assist you.
- 12.7. You have the right of access to your personal information and the right to correct any errors relating to the information that we have on record. In addition, you have the right to object to us continuing to process your personal information. In this regard, please note that if you do exercise this right, we will not be able to do our work properly. In addition, this might place you in breach of a contract.
- 12.8. We are obliged by law or contractual obligations to retain our records for a specific period of time after we have completed our work. During this period, your personal information will also remain protected. After this period has expired, your personal information will be destroyed in a way that de-identifies you.

13. How We Will Use Your Information

- 13.1. In carrying out our ordinary business and organisational functions, we may require Personal Information relating to both individual and juristic persons. As a Responsible Party for the purposes of POPIA, we will ensure that your Personal Information is processed in accordance with your rights, being the right to:
 - 13.1.1. be notified that your Personal Information is being collected by us and to be notified in the event of a data breach;
 - 13.1.2. know whether we hold Personal Information about you, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;



- 13.1.3. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
 - 13.1.4. object to our use of your Personal Information and request the deletion of such Personal Information (deletion would be subject to our record keeping requirements);
 - 13.1.5. object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and Page 18 of 34 Date of Compilation: 08042020 Date of Revision: 08042021;
 - 13.1.6. complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPI and to institute civil proceedings regarding the alleged non-compliance with the protection of your personal information.
- 13.2. Generally, we will only process your personal information as listed in Annexure 1 hereto.

14. Where Information May Be Held

Information may be held at our offices and those of our affiliate companies and third-party agencies, service providers, representative and agents as described above. Information may be transferred internationally including to South Africa and other countries around the world, particularly if a Visa is required by you to travel to another country in order to perform your role.

15. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

16. Do we need your consent?

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.



17. Automated Decision-Making

- 17.1. Automated decision-making takes place when an electronic system uses personal information to decide without human intervention. We are allowed to use automated decision-making in the following circumstances:
 - 17.1.1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
 - 17.1.2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
 - 17.1.3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.
 - 17.1.4. If we make an automated decision based on any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.
- 17.2. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.
- 17.3. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

18. Why might you share my personal information with third parties?

- 18.1. We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.
- 18.2. We share your data with third parties in order to obtain pre-employment references from other employers and obtain credit/employment background checks from third-party providers. The Company may also share your data with third parties in the context of a sale of some or all its business. In those circumstances the data will be subject to confidentiality arrangements.

19. Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents). The following activities are carried out by third-party service providers: Health and Safety administration and IT services.



20. Data transfer security

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

21. What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction. We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to SARS and disclosures to shareholders such as directors remuneration reporting requirements.

22. Transferring information outside South Africa

We may transfer the personal information we collect about you internationally (outside South Africa) in order to perform our contract with you. Personal information is only shared for specified purposes and in accordance with our instructions. This will only be to those at managerial level and to those who have business authorisation.

23. Data Security

- 23.1. We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- 23.2. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and keep it secure.
- 23.3. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures are available on request.



- 23.4. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

24. Data Retention

- 24.1. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are set out in our Data Protection Policy which is available upon request. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 24.2. In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the Company, we will retain and securely destroy your personal information in accordance with our Data Protection Policy and any applicable laws and regulations.

25. Rights of Access, Correction, Erasure, And Restriction

25.1. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

25.2. Your Rights in Connection with Personal Information under certain circumstances, by law you have the right to:

- 25.2.1. Request access to your personal information (commonly known as a "subject access request" ("SAR")). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 25.2.2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 25.2.3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for

us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

25.2.4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

25.2.5. Request the restriction of processing your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

25.2.6. Request the transfer of your personal information to another party.

25.2.7. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact your direct line manager in writing.

25.3. Right to Withdraw Consent

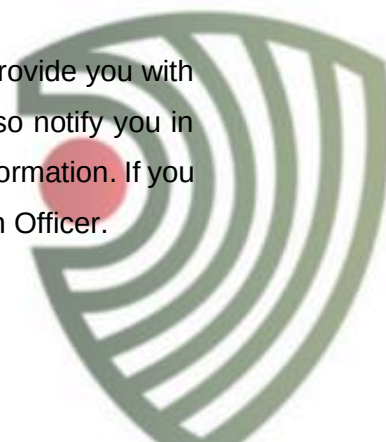
In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your direct line manager. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

25.4. How to Complain

We hope that we can resolve any query or concern you may have about our use of your information. If not, you have the right to make a complaint at any time to the Information Regulator's Office, the South Africa supervisory authority for data protection issues to POPIAComplaints.IR@justice.gov.za.

25.5. Changes to this Manual

We reserve the right to update this manual at any time, and we will provide you with a new manual when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. If you have any questions about this manual, please contact the Information Officer.



26. Availability of the Manual

A copy of the Manual is available-

- 26.1. On www.deltrolux.co.za ;
- 26.2. in the head office of DELTROLUX for public inspection during normal business hours;
- 26.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
- 26.4. to the Information Regulator upon request.

A fee for a copy of the Manual, shall be payable per each A4-size photocopy made.

27. Updating of the Manual

The head of DELTROLUX reserves the right to on a regular basis update this manual.

Issued by


Dwayne-Lodi Kloppers
as the official Information Officer
and Chief Executive Officer



Annexure 1: Information held and processed

PART 1 – Processing of Personal Information in Accordance with POPI

For consumers:

- Performing duties in terms of any agreement with consumers;
- Make, or assist in making credit decisions about consumers;
- Operate and manage consumers' accounts and manage any application, agreement or correspondence consumers may have with DELTROLUX;
- Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about our products and services, unless consumers indicate otherwise;
- To form a view of consumers as individuals and to identify, develop or improve products, that may be of interest to consumers;
- Carrying out market research, business and statistical analysis;
- Performing other administrative and operational purposes including the testing of systems;
- Recovering any debt consumers may owe DELTROLUX;
- Complying with the DELTROLUX's regulatory and other obligations
- Any other reasonably required purpose relating to the DELTROLUX's business

For prospective consumers:

- Verifying and updating information;
- Pre-scoring;
- Direct marketing;
- Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the DELTROLUX's business.

For employees:

- The same purposes as for consumers (above);
- Verification of applicant employees' information during recruitment process;
- General matters relating to employees:
- Pension;
- Medical aid;
- Payroll;
- Disciplinary action;
- Training
- Any other reasonably required purpose relating to the employment or possible employment relationship.

For vendors /suppliers /other businesses:

- Verifying information and performing checks;
- Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- Payment of invoices;
- Complying with the DELTROLUX's regulatory and other obligations; and
- Any other reasonably required purpose relating to DELTROLUX's business

PART 2 - Categories of Data Subjects and Categories of Personal Information relating thereto

Employees

- Name and contact details;
- Identity number and identity documents including passports;



- Employment history and references;
- Banking and financial details;
- Details of payments to third parties (deductions from salary);
- Employment contracts;
- Employment equity plans;
- Medical aid records;
- Pension Fund records;
- Remuneration/salary records;
- Performance appraisals;
- Disciplinary records;
- Leave records;
- Training records;

Consumers and prospective consumers (which may include employees)

- Postal and/or street address;
- Title and name;
- Contact numbers and/or e-mail address;
- Ethnic group;
- Employment history;
- Age;
- Gender;
- Marital status;
- Nationality;
- Language;
- Financial information;
- Identity or passport number;
- Browsing habits and click patterns on DELTROLUX's websites.

Vendors /suppliers /other businesses:

- Name and contact details;
- Identity and/or company information and directors' information;
- Banking and financial information;
- Information about products or services;
- Other information not specified, reasonably required to be processed for business operation

PART 3 – Recipients of Personal Information

- Any firm, organisation or person that DELTROLUX uses to collect payments and recover debts or to provide a service on its behalf;
- Any firm, organisation or person that/who provides DELTROLUX with products or services;
- Any payment system DELTROLUX uses;
- Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where DELTROLUX has a duty to share information;
- Third parties to whom payments are made on behalf of employees;
- Financial institutions from whom payments are received on behalf of data subjects;
- Any other operator not specified;
- Employees, contractors and temporary staff; and
- Agents.

PART 4 – Cross border transfers of Personal Information



- Personal Information may be transmitted transborder to DELTROLUX's suppliers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. DELTROLUX will endeavour to ensure that its dealers and suppliers will make all reasonable efforts to secure said data and Personal Information.

PART 5 – Description of information security measures

DELTROLUX undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. DELTROLUX may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

1. Access Control of Persons

DELTROLUX shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

2. Data Media Control

DELTROLUX undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by us and containing personal data of Customers.

3. Data Memory Control

DELTROLUX undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorised reading, alteration or deletion of stored data.

4. User Control

DELTROLUX shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.

5. Access Control to Data

DELTROLUX represents that the persons entitled to use our data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

6. Transmission Control

DELTROLUX will be obliged to enable the verification and tracing of the locations / destinations to which the personal information is transferred by utilization of our data communication equipment / devices.

7. Transport Control

DELTROLUX shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

8. Organisation Control

DELTROLUX shall maintain its internal organisation in a manner that meets the requirements of this Manual



Annexure 2: Request for Access to record of private body

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

FORM C

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

[Regulation 10]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

(a) The particulars of the person who requests access to the record must be given below.

(b) The address and/or fax number in the Republic to which the information is to be sent must be given.

(c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:

Identity number:

Postal address:

Telephone number: (.....)..... Fax number: (.....).....

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname:

Identity number:

D. Particulars of record

(a) 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.

(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.



1. Description of record or relevant part of the record:

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2. Reference number, if available:

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3. Any further particulars of record:

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E. Fees

(a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.

(b) You will be notified of the amount required to be paid as the request fee.

(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 for exemption from payment of fees:

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F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:

Form in which record is required:

Mark the appropriate box with an X.

NOTES:

(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.

(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.

(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:

copy of record* ☐ inspection of record ☐

2. If record consists of visual images -

(This includes photographs, slides, video recordings, computer-generated images, sketches, etc.):

view the images ☐ copy of the images* ☐ transcription of the images* ☐

3. If record consists of recorded words or information which can be reproduced in sound:

listen to the soundtrack ☐ transcription of soundtrack* ☐

(Audio cassette)

(written or printed document)

4. If record is held on computer or in an electronic or machine-readable form:

printed copy of record* ☐

printed copy of information derived from the record* ☐

copy in computer readable form*(stiffy or compact disc) ☐

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you. Postage is payable. ☐ YES ☐ NO

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form.

The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:



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2. Explain why the record requested is required for the exercise or protection of the
aforementioned right:

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H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to
be informed in another manner, please specify the manner and provide the necessary
particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the
record?

.....
.....

Signed at this day..... ofyear

SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE



Annexure 3: Objection to processing of personal information (Form 1 of the Regulations)

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, 2018
[Regulation 2]

Note:

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

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	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at this day of20.....

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



Annexure 4: Request for correction or deletion of personal information (Form 2 of the Regulations)

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:

Affidavits or other documentary evidence as applicable in support of the request may be attached.

If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

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.
- ☐ 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 authorised to retain the record of information.



A	DETAILS OF THE 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/ DESTROYED
REASONS FOR *CORRECTION 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 this day of20.....

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

