

**ALTRON**

**PAIA AND POPIA MANUAL**

OF

**ALTRON LIMITED**

**("ALTRON")**

Registration number 1947/024583/06 and  
its subsidiaries

in terms of Section 51 of

the Promotion of Access to Information Act No. 2 of 2000

as amended ("PAIA")

and Section 55 of the Protection of Personal Information Act No. 4  
of 2013 as amended ("POPI Act")

Updated: July 2023

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*Johannes Jacobus Benjamin Schutte*

Approved By: \_\_\_\_\_

**Hansie Schutte**

**Group Executive: Legal**

On behalf of Altron Executive Committee

Approve:  \_\_\_\_\_

**Werner Kapp**

**Chief Executive Officer**

On behalf of Altron Executive Committee

Table 1 - Revision History

Version	Date	Revision Author	Summary of Changes
1.0	May 2021		Updated Policy to include POPIA changes
1.1	July 2023	Hansie Schutte	Updated with new names of CEO and CIO
1.2			

Table 2 - Document Review List

Name & Surname	Date	Designation	Business Area
Jacqueline Everton	July 2023	Paralegal	Legal
Lizaan Lewis	July 2023	Senior Legal Advisor / Information Officer	Legal
Hansie Schutte	July 2023	Group Executive: Legal	Legal

Table 3 - Document Approval List

Name & Surname	Date	Designation	Signature
1.0 Lizaan Lewis	July 2023	Senior Legal Advisor / Information Officer	<i>Lizaan Lewis</i>
1.1 Hansie Schutte	July 2023	Group Executive: Legal	<i>Johanna Jacobs-Beyers Schutte</i>
1.2 Werner Kapp	July 2023	Chief Executive Officer	<i>W Kapp</i>

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## 1. SCOPE

### 1.1 OBJECTIVE

The purpose of this document is to serve as the Manual for Altron Limited ("Altron") and its subsidiaries (also known as operating companies) altogether referred to as the Group as required in terms of Section 51 of the Promotion of Access to Information Act No: 2 of 2000 ("PAIA") in order to promote the right of access to information, giving effect to the constitutional right in terms of section 32 of the Constitution of the Republic of South Africa Act No: 108 of 1996 ("the Constitution").

Section 9 of PAIA limits the right to access information, such justifiable limitations include commercial confidentiality, good governance and the protection of personal information as prescribed by the Protection of Personal Information Act No: 4 of 2013 ("POPIA").

This Manual sets out the responsibilities of the Altron Group appointed Information Officers who will take up the duties mandated in PAIA and POPIA, to ensure compliance with PAIA and POPIA.

This Manual provides a reference to the records held by the Altron Group and the procedures that need to be followed to request access to such records.

Altron respects the privacy of personal information as referred to in the Altron Privacy Policy (<https://www.altron.com/privacy-policy/>) for details on how Altron collects and uses personal information, with whom it is shared, and data subject choices and rights in relation to their personal information.

### 1.2 APPLICATION AND RESPONSIBILITIES

Altron and its wholly owned subsidiaries, Altron TMT Holdings (Pty) Ltd, Altron TMT SA Group (Pty) Ltd, Altron TMT (Pty) Ltd ("Altron TMT"), Netstar Group (Pty) Ltd ("Netstar"), Altron Nexus (Pty) Ltd ("Nexus") and Arrow Altech Distribution (Pty) Ltd ("AAD") ["all of which will be referred to collectively as sub-holdings"], conducts business in the information and communications technology ("ICT") and electronic components distribution industries.

Under each sub-holding are several subsidiaries and operating divisions. For purposes of this Manual, Altron, Altron TMT, Netstar, Altron Nexus and AAD and their subsidiaries and divisions will individually and collectively be referred to as "the Group". Accordingly, the active (not dormant) operating subsidiaries and divisions covered by this Manual are:

#### 1.2.1 ALTRON

Operating subsidiaries and/or divisions	Registration number
Allied Electronics Corporation Limited	1947/024583/06
Altron Finance Proprietary Limited	1969/014983/07
Altron Management Services Proprietary Limited	1971/013786/07

#### 1.2.2 ALTRON TMT

Operating subsidiaries and/or divisions	Registration number
Altron TMT Holdings Proprietary Limited (Formerly Allied Technologies Limited)	1946/020415/07
Altron TMT SA Group Proprietary Limited (Formerly Bytes Technology Group South Africa (Pty) Ltd)	2003/027603/07
Altron TMT Proprietary Limited	1984/003805/07
Altron Head Office (formerly known as Altron Management Services), a division of Altron TMT Proprietary Limited	
Altron Head Office (formerly known as Altron Group Services), a division of Altron TMT Proprietary Limited	
Netstar International, a division of Altron TMT Proprietary Limited	

Operating subsidiaries and/or divisions	Registration number
<i>Altron Document Solutions</i> , a division of Altron TMT Proprietary Limited	
<i>Altron Managed Solutions</i> , a division of Altron TMT Proprietary Limited	
<i>Altron People Solutions</i> , a division of Altron TMT Proprietary Limited	
<i>Altron Systems Integration</i> , a division of Altron TMT Proprietary Limited (incorporating the former Bytes Universal Systems, a division of Altron TMT (Pty) Ltd)	
<i>Altron Healthtech</i> , a division of Altron TMT Proprietary Limited	
<i>Altron Fintech</i> , a division of Altron TMT Proprietary Limited	
<i>Altron Karabina</i> , a division of Altron TMT Proprietary Limited	
<i>Altron Security</i> , a division of Altron TMT Proprietary Limited	
Altech Autopage Cellular Proprietary Limited	1993/006786/07
Bytes Systems Integration (Pty) Ltd	1995/012031/07

1.2.3 NETSTAR

Operating subsidiaries and/or divisions	Registration number
Netstar Group Proprietary Limited	2010/009067/07
Netstar Proprietary Limited	1992/001223/07
Netstar International (Pty) Ltd (holder of foreign subsidiaries) <ul style="list-style-type: none"> <li>• Netstar Australia Holdings (Pty) Ltd</li> <li>• Netstar Australia (Pty) Ltd</li> <li>• Fleet Logistics (Pty) Ltd t/a EZY2C (Australia)</li> </ul>	2010/008979/07 ACN 631882721 ACN 091898547 ACN110 455 591
Autopage (Cape) Proprietary Limited	1983/005492/07
Netstar Group Proprietary Limited	2010/009067/07

1.2.4 ALTRON NEXUS

Operating subsidiaries and/or divisions	Registration number
Altron Nexus Proprietary Limited	2009/020638/07
<i>Altron Nexus Solutions</i> , a division of Altron Nexus Proprietary Limited	
<i>Altron Nexus Distributors</i> , a division of Altron Nexus Proprietary Limited	
<i>Altron Nexus @Connect</i> , a division of Altron Nexus Proprietary Limited	
Altech Fleetcall Proprietary Limited	1993/004466/07

Altron Nexus Smart Cities Proprietary Limited	1964/001065/07
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1.2.5 AAD

Operating subsidiaries and/or divisions	Registration number
Arrow Altech Holdings Proprietary Limited	1997/000401/07
Arrow Altech Distribution Proprietary Limited	1997/000402/07
Erf 211 Hughes Proprietary Limited	1991/001362/07

1.2.6 BYTES

Operating subsidiaries and/or divisions	Registration number
Bytes Technology Group Proprietary Limited (in which the Group's interests outside of South Africa are held)	1911/003874/07
<ul style="list-style-type: none"> <li>• <i>Altron Africa Limited (Mauritius) (incorporating its division BTG EMEA (Mauritius))</i></li> <li>• <i>Altron BTG Kenya Limited</i></li> <li>• <i>Bytes Technology Group Emirates LLC</i></li> <li>• <i>Altron Technologies Namibia (Pty) Ltd</i></li> <li>• <i>Bytes Technology Group Mocambique Limitada</i></li> <li>• <i>Altron Botswana (Pty) Ltd</i></li> <li>• <i>Altron Tanzania Limited</i></li> <li>• <i>Altron Technologies Zambia Limited</i></li> <li>• <i>Altron Lesotho (Pty) Ltd</i></li> <li>• <i>Altron Eswatini Proprietary Limited</i></li> <li>• <i>Altron Rwanda Limited</i></li> <li>• <i>Altron Technologies Limited (Incorporated in Malawi)</i></li> <li>• <i>Altron Security Limited</i></li> <li>• <i>Altron Europe Limited</i></li> </ul>	17650/07  CPR/2011/59275 627083 79/164 5571/MP/G/2001 CO.97/2046 140513679 120190008538 69704 R7/55748 110355867 TMBRS1011907 12763151 12811819

1.2.7 UEC

Operating subsidiaries and/or divisions	Registration number
Altech Multimedia Proprietary Limited	1988/001568/07

2. COMPANY CONTACT DETAILS: SECTION 51(1)(A)

The Chief Executive Officer of Altron, as Head of Altron as defined in the Act and in accordance with a resolution of the Altron Board has duly authorised the contact person below to ensure that the Act is complied with vis-a-vis the Group:

Contact Person Mrs Lizaan Lewis  
 Designation Group Information Officer  
 Physical Address Altron Campus  
 20 Woodlands Drive  
 Woodlands Office Park  
 Woodmead  
 Gauteng  
 2191



Postal Address P O Box 981  
Houghton 2041  
SOUTH AFRICA

Telephone +27 11 645 3600

E-mail address PrivacyOffice@Altron.com

Website address [www.altron.com](http://www.altron.com)

The detail regarding the subsidiary Information Officers is provided in Annexure D.

### 3. PAIA: SECTION 51 (1)(B)

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest. For purposes of PAIA, Altron and all its subsidiaries are private bodies.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of this Manual.

Section 23 of POPIA (read with sections 18 and 53 of PAIA), grants a data subject (a customer, employee or third party) a right to request confirmation of records containing their personal information being held by the Group, which confirmation shall be provided 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.

Requesters are referred to the Guide in terms of Section 10 of PAIA which has been compiled by the South African Human Rights Commission ("SAHRC"), which contains information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC or at their website at <http://www.sahrc.org.za/>.

The contact details of the SAHRC are:

Physical Address The South African Human Rights Commission  
Braampark Forum 3  
33 Hoofd Street  
Braamfontein, Johannesburg

Postal Address Private Bag X2700 Houghton, 2041

Telephone +27 11 877 3600

Fax +27 11 403 0668

Website address [www.sahrc.org.za](http://www.sahrc.org.za)

### 4. APPLICABLE LEGISLATION: SECTION 51(1)(C)

Records are available in accordance with the following current South African legislation and any amendments thereof and regulations thereto (only to the extent that the relevant Act is applicable, and which therefore makes disclosure of records compulsory):

No	Reference	Act
1	No 26 of 2005	Auditing Professions Act
2	No. 75 of 1997	Basic Conditions of Employment Act
3	No. 53 of 2003	Broad-Based Black Economic Empowerment Act
4	No. 71 of 2008	Companies Act



No	Reference	Act
5	No. 130 of 1993	Compensation for Occupational Injuries and Diseases Act
6	No. 89 of 1998	Competition Act
7	No 108 of 1996	Constitution of the Republic of South Africa
8	No. 68 of 2008	Consumer Protection Act
9	No 91 of 1964	Customs and Excise Act
10	No 36 of 2005	Electronic Communications Act
11	No. 25 of 2002	Electronic Communications and Transactions Act
12	No. 55 of 1998	Employment Equity Act
13	No. 38 of 2001	Financial Intelligence Centre Act
14	No. 15 of 1973	Hazardous Substances Act
15	No 68 of 1962	Identification Act
16	No. 58 of 1962	Income Tax Act
17	No. 24 of 1936	Insolvency Act
18	No 38 of 1997	Intellectual Property Laws Amendment Act
19	No. 66 of 1995	Labour Relations Act
20	No. 131 of 1998	Medical Schemes Act
21	No. 34 of 2005	National Credit Act
22	No. 107 of 1998	National Environment Management Act
23	No. 39 of 2004	National Environmental Management: Air Quality Act
24	No. 59 of 2008	National Environmental Management: Waste Act
25	No. 61 of 2003	National Health Act
26	No. 36 of 1998	National Water Act
27	No. 85 of 1993	Occupational Health and Safety Act
28	No. 24 of 1956	Pension Funds Act
29	No. 4 of 2013	Protection of Personal Information Act
28	No. 68 of 1969	Prescription Act
29	No. 2 of 2000	Promotion of Access to Information Act
30	No. 26 of 2000	Protected Disclosures Act
31	No. 70 of 2002	Regulation of Interception of Communications and Provision of Communication – Related Information Act
32	No. 36 of 2004	Securities Services Act
33	No. 97 of 1998	Skills Development Act
34	No. 9 of 1999	Skills Development Levies Act

No	Reference	Act
35	No. 4 of 2002	Unemployment Insurance Contributions Act
36	No. 89 of 1991	Value Added Tax Act

## 5. SCHEDULE OF RECORDS AVAILABLE: SECTION 51(1)(D)

The following categories of records are automatically available without a person having to request access in terms of PAIA:

Category	Records
Listed company records available for inspection	<p><i>Share register</i> Monthly download from STRATE</p> <p><i>Dividend register</i> Annual register as supplied by the transfer secretaries</p> <p><i>Financial statements</i> Integrated annual report Interim report and results Annual financial results announcement Trading statements and business updates published (including where appropriate profit forecasts)</p> <p><i>JSE news (SENS)</i> Appointments/resignation of directors Share dealings of directors</p> <p>Dividend declarations</p> <p><i>Announcements</i> Rights offers Mergers and acquisitions Share placing Claw-back offers Schemes of arrangement Prelisting statements</p> <p><i>Corporate transactions</i> Circulars to shareholders Notices of general meetings</p> <p><i>Shareholders' meeting minutes (For shareholders only)</i> Special and general meetings of the company Annual general meeting of the company</p>

Category	Records
Auditors	<p>The company's current auditors are:</p> <p>PricewaterhouseCoopers Inc.                      Waterfall City Heliport                      4 Lisbon Lane                      Jukskei View                      Midrand                      2090                      SOUTH AFRICA</p>

Records are subject to the Altron Record Policies, Procedures and Processes, and will be access controlled depending on the classification.

The Group has in its possession the following categories of records on the subject matters referred to hereunder and for which a request for access needs to be made in terms of PAIA or the POPI Act:

Category	Records
Accounting	<p>The Accounting department maintains financial and management accounts for the Group and provides back-office activities that support Integrated Treasury and Cash Management. Corporate Account records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Accounting Records</li> <li>• Consolidation Records</li> <li>• General Correspondence</li> <li>• Internal Reports and Communications</li> <li>• Investment Records</li> <li>• Management Reports</li> <li>• PAYE Records</li> <li>• Tax Records</li> <li>• Transactional Records</li> <li>• Treasury Dealing and Settlement Records</li> <li>• VAT Records</li> </ul>
Chief Executive Officer's office	<p>The Chief Executive's office records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Administration Records</li> <li>• Financial Reports</li> <li>• Internal Reports and Communications</li> <li>• Research Records</li> <li>• Sponsorship Records</li> <li>• Statutory Records</li> </ul>
Company investments	List of subsidiary companies, associates and joint ventures

Category	Records
Company Secretary	<p>The Company Secretary provides company secretarial services to the Group. Company Secretary records comprise of the following main categories:</p> <ul style="list-style-type: none"> <li>• Relevant Contracts and Agreements</li> <li>• General Correspondence</li> <li>• Internal Reports and Communications</li> <li>• Investment Records</li> <li>• Minute Books</li> <li>• Proxy forms</li> <li>• Records relating to appointment of Directors</li> <li>• Records of resolutions</li> <li>• Share Registration Records</li> <li>• Statutory Records</li> <li>• Long-term share based incentive schemes.</li> <li>• Copies of the relevant trust deeds and rules.</li> </ul>
Corporate Communications and Marketing	<p>The Corporate Communications and Marketing team provide communications and marketing services to the Group. Corporate Communications records consist of the following main categories:</p> <ul style="list-style-type: none"> <li>• Advertising and promotional material</li> <li>• Analyst presentations</li> <li>• Corporate mission statement</li> <li>• Corporate video</li> <li>• Memos from the Chairman</li> <li>• Press releases</li> <li>• Staff magazine</li> <li>• Weekly update to staff</li> </ul>
Group Tax	<p>Group Tax provides advice to the Group on all aspects of taxation. Group Tax records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Administrative Records</li> <li>• Corporate, Subject and Country Records</li> <li>• Internal Reports and Communications</li> <li>• Tax Records</li> </ul>
Human Capital (HR) Department	<p>The Human Capital department's primary objective is to develop and implement a competitive human resource strategy that will support the Group. Human Resource records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Relevant Contracts</li> <li>• Disciplinary records</li> <li>• Employee benefit Records</li> <li>• Employee Records</li> <li>• Employee tax records (IRP 5's)</li> <li>• Employment Equity Records</li> <li>• Employment Equity returns to the Department of Labour</li> <li>• General Correspondence</li> <li>• General HR Policies and Procedures</li> <li>• Health and Safety records</li> <li>• Labour Relations Records</li> <li>• Leave records</li> <li>• Medical Aid records</li> <li>• Payroll reports</li> <li>• Pension Records</li> <li>• Salary records</li> <li>• SETA records</li> <li>• Skills development levies</li> <li>• Standard Terms and Conditions of Employment applicable to all Staff</li> <li>• Statutory Records</li> </ul>

Category	Records
	<ul style="list-style-type: none"> <li>• Training Records</li> <li>• UIF</li> <li>• Workmen's Compensation</li> <li>• Work skills development plan submitted to the Finance and Accounting Services Sector Education and Training Authority (FASSET)</li> </ul>
Group Risk and Compliance (GRC) department	<p>GRC's purpose is to provide the Corporate Offices and Operations held through the Group with assurance that risks and compliance issues are being appropriately managed across the Group. GRC records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Audit reports</li> <li>• General Administration Records</li> <li>• General Correspondence</li> <li>• Risk Management Records</li> <li>• Compliance related Records</li> <li>• Insurance Records</li> </ul>
IT Governance Committee	<p>The IT Governance Committee is responsible for developing, supporting and providing assurance on the implementation of IT policies, procedures, standards and best practice in the Group. IT governance committee records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Disaster Recovery Plans</li> <li>• General Correspondence</li> <li>• Group wide Contracts and Agreements</li> <li>• Policy Records</li> <li>• Software Licensing</li> </ul>
Legal Department	<p>The Legal department provides assistance with all corporate legal matters material to the Group. Legal department records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Copies of Agreements</li> <li>• General Correspondence</li> <li>• Immovable Property Records</li> <li>• Internal Reports and Communications</li> <li>• Legal Records</li> <li>• Litigation Records</li> <li>• Intellectual Property Rights Records (Trademarks, Patents, Registered Designs and Copyright)</li> <li>• Statutory Records</li> <li>• Working Files</li> </ul>
Medical and Occupational Health Service	<p>Certain Group companies provide general clinic services to their employees. Medical records comprise the following main categories:</p> <ul style="list-style-type: none"> <li>• Accounting Records</li> <li>• Clinic Policies</li> <li>• Relevant Contracts and Agreements</li> <li>• Employee Records</li> <li>• General Correspondence</li> <li>• Medical Policies</li> <li>• Medical Records</li> <li>• Medical Reference material</li> <li>• Minutes of Meetings</li> </ul>

A person (customer, employee or third party) has the right to request access in terms of section 23 of POPIA:

Category	Records
Personal Information	<ul style="list-style-type: none"> <li>any recorded piece of information relevant to a data subject, including but not limited to the following, which can be in either hard copy or electronic format:</li> <li>race, gender, sex, pregnancy, marital status, nationality, ethnicity, or social origin; sexual orientation; age; physical or mental health and well-being</li> <li>belief, religion, conscience, culture, language and birth, education, medical information, financial information, criminal or employment history</li> <li>an identifying number or symbol</li> <li>disability, personal opinions, blood type, biometric information</li> <li>views or preferences of a person, correspondence of private or confidential nature, views, or opinions of another person</li> <li>name of a person if it appears with other personal information</li> <li>consumer or purchasing pattern</li> <li>e-mail address and physical address, location information or online identifier and telephone number and mobile number.</li> </ul>
Special Personal Information	<ul style="list-style-type: none"> <li>a special category of personal information - is religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sex life, criminal behaviour and biometric information. Where personal information is referenced, it will automatically include special personal information unless otherwise indicated.</li> </ul>

## 6. FORM OF REQUEST: PAIA SECTION 18 AND 53 (1) (ALSO APPLICABLE TO POPI ACT SECTION 23)

To facilitate the processing of your request, kindly:

- Use the prescribed form (Form C – when a request is made to a private body or business), available on the website of the South African Human Rights Commission (SAHRC) at [www.sahrc.org.za](http://www.sahrc.org.za).
- Address your request to the Group Information Officer.
- Provide sufficient details to enable the Company to identify:
  - The record(s) requested;
  - The requester (and if an agent is lodging the request, proof of capacity);
  - The form of access required:
    - The postal address, email address or fax number of the requester in the Republic;
    - If the requester wishes to be informed of the decision in any manner (in addition to written) and the manner and particulars thereof;
  - The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

Any request for access to records should be submitted on the prescribed form C (a copy of which is attached) which should be sent to the Group Information Officer whose name and address details appear in paragraph 2 hereof.

## 7. PRESCRIBED FEES AND PROCEDURE: SECTION 54

The following applies to requests:

- A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;

- If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- Records may be withheld until the fees have been paid.
- The fee structure is available on the website of the South African Human Rights Commission (SAHRC) at [www.sahrc.org.za](http://www.sahrc.org.za).

Please note that the correct completion and submission of a Request for Access form does not automatically entitle or allow the requester access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a category as specified in section 23 (4)(a) of the POPIA read with Part 3 Chapter 4 of PAIA.

Please further note that if it is reasonably suspected that a requester has obtained access to a record based on the submission of materially incorrect, false or misleading information, legal proceedings may be instituted against such requester.

If a request for access is successful an access fee will be payable for the search, reproduction and/or preparation of records and which will be calculated based on the fee prescribed under PAIA, an extract of the details of which is attached at the end of this Manual.

### 7.1 COMPLETION OF REQUEST FOR ACCESS FORM

All requesters should take note of the following guidelines when completing the attached Request for Access to Record of a Private Body (refer to Annexure : Form C):

- The form must be completed by filling in all lines and spaces;
- Proof of the identity, in the form of a copy of the requester's identity document, is required to be submitted with the application;
- If the requester is a body corporate, the authority of the person submitting the application on behalf of such body corporate must be proven on the basis of a written authority to be attached;
- Type or print in a clear eligible manner, if a question does not apply indicate so by inserting "N/A" in response to that question, and if there is nothing to disclose in response to a particular question write "NIL" in response thereto;
- If there is insufficient space in the form, add additional folios on which the additional information is provided, clearly indicating to which question this relates.

Request for information will be evaluated and the requester will be notified within 30 days after receipt of the request in the prescribed format of the following:

### 7.2 NOTIFICATION OF EXTENSION PERIOD (IF REQUIRED)

Requesters must take note that in terms of PAIA, the 30 days period mentioned above may be extended for a further period of not more than 30 days under certain circumstances (details will be provided together with the notification of such extension).

### 7.3 THE ACCESS FEES AND/OR DEPOSIT

The requester will be informed of the access fee or deposit (if any) which is payable for having access to the records and for the search, reproduction and/or preparation work involved, the account details and of the methods in which payment may be made. In addition, a deposit may be requested which is fully refundable if the application is ultimately refused.



#### 7.4 DECISION ON REQUEST

The requester will be informed whether or not the application for access has been denied, or granted. In the event that the application is refused, the requester will be given adequate reasons for the refusal and will be informed that the requester may lodge an application with a Court (if a PAIA request) or the Information Regulator (if a POPIA) against the refusal of the application, as well as the procedure (including the period) for lodging such application.

#### 7.5 GROUNDS FOR REFUSAL

The Group may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Group may refuse include:

- Protecting personal information that the Group hold about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- Protecting commercial information that the Group holds about a third party or the Group (for example trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of the Group or the third party);
- If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- If disclosure of the record would endanger the life or physical safety of an individual;
- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- If disclosure of the record would prejudice or impair the protection of the safety of the public;
- The record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the Group;
- Disclosure of the record would put the Group at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- The record is a computer program which is owned by the Group and protected by Copyright;
- The record contains information about research being carried out or about to be carried out on behalf of a third party of the Group and/or
- Information not yet in the public domain

#### 7.6 RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

If the Group has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try and locate the record.

### 8. THIRD PARTY INFORMATION

If access is requested to a record that contains information about a third party, the Group is obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.

In the event of the third party furnishing reasons for the support or denial of access, our designated Group Information Officer will consider these reasons in determining whether access should be granted, or not.

**ANNEXURE A : PAIA FORM C : REQUEST FOR ACCESS TO RECORDED OF PRIVATE BODY**

**REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**  
(Section 53(1) of the Promotion of Access to Information Act,  
2000 (Act No. 2 of 2000) – also applicable to the POPI Act in  
terms of section 25)

[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:

Fax number:

Telephone 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. If a request is for records containing personal information, the request must be made by the person to whom the personal information relates unless exceptional circumstances can be proven

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.

- Description of record or relevant part of the record:
- Reference number, if available:
- Any further particulars of record:

E: Fees

- (a) A request for access to a record, other than the initial request to confirm the existence of 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:

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 hereunder, state your disability and indicate in which form the record is required.

Disability: Form in which record is required:	Form in which record is required	
Mark the appropriate box with an X.		
<p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(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.</p> <p>(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.</p>		

<b>1. If the record is in written or printed form:</b>			
	copy of record*		inspection of record
<b>2. If record consists of visual images - this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</b>			
	view the images	copy of the images"	transcription of the images*
<b>3. If record consists of recorded words or information which can be reproduced in sound:</b>			
	listen to the soundtrack audio cassette	transcription of soundtrack* written or printed document	
<b>4. If record is held on computer or in an electronic or machine-readable form:</b>			
	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.

- 
- Indicate which right is to be exercised or protected:
- 
- Explain why the record requested is required for the exercise or protection of the aforementioned right.

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 of ..... 20.....

\_\_\_\_\_  
SIGNATURE OF REQUESTER /  
PERSON ON WHOSE BEHALF  
REQUEST IS MADE

**ANNEXURE B: POPIA FORM 1: OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION**

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]**

*Note:*

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

A	DETAILS OF DATA SUBJECT
<b>Name(s) and surname/ registered name of data subject:</b>	
<b>Unique Identifier/ Identity Number</b>	
<b>Residential, postal or business address:</b>	
	Code (    )
<b>Contact number(s):</b>	
<b>Fax number / E-mail address:</b>	
B	DETAILS OF RESPONSIBLE PARTY
<b>Name(s) and surname/ Registered name of responsible party:</b>	
<b>Residential, postal or business address:</b>	
	Code (    )
<b>Contact number(s):</b>	
<b>Fax number/ E-mail address:</b>	

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

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

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



**ANNEXURE C : POPIA FORM 2 : REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION**

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]**

*Note:*

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

Mark the appropriate box with an "x".

**Request for:**

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 DATA SUBJECT
<b>Name(s) and surname/ registered name of data subject:</b>	
<b>Unique Identifier/ Identity Number</b>	
<b>Residential, postal or business address:</b>	
	Code (    )
<b>Contact number(s):</b>	
<b>Fax number / E-mail address:</b>	
B	DETAILS OF RESPONSIBLE PARTY

<b>Name(s) and surname/ Registered name of responsible party:</b>	
<b>Residential, postal or business address:</b>	
	Code (    )
<b>Contact number(s):</b>	
<b>Fax number/ E-mail address:</b>	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED</b>
<b>D</b>	<p><b>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</b></p> <p><b>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.</b></p> <p><i>(Please provide detailed reasons for the request)</i></p>

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

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



**ANNEXURE D : INFORMATION OFFICER AND DEPUTY INFORMATION OFFICERS**

Altron Chief Executive Officer (CEO) : Werner Kapp

The Altron CEO, Werner Kapp, formally delegated responsibilities to Altron Information Officer (IO): Lizaan Lewis (Altron TMT).

The other Legal entity Managing Directors have delegated to the following Information Officers:

Altron Arrow – Renato Martins (MD) to Charlene Thompsett (DIO)

Altron Nexus – Louis du Toit (MD) to Dudu Lekubu (DIO)

Netstar – Grant Frazer (MD) to Koogan Naicker (DIO)

The Altron TMT Information Officer formally delegated responsibilities to the Deputy Information Officers (DIOs) per Operation.

- Altron Document Solutions: Ismail Moosa
- Altron Managed Solutions: Laura Battezzati- Collier
- Altron Systems Integration: Dudu Lekubu
- Altron Fintech: Gerhard Mentz
- Altron HealthTech: Annelize de Bruyn

No Deputy Information Officers were appointed for the following Operations – refer to Altron TMT Information Officer

- Altron Head Office
- Altron Karabina
- Altron Security