

CaEFT PROPRIETARY LIMITED

(Registration Number: 2021/969009/07)

("CaEFT")

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

("Manual")

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

Date of Compilation: 11 March 2025 (as updated on [insert latest update date])

1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 "DIO" – Deputy Information Officer;
 - 1.2 "IO" – Information Officer;
 - 1.3 "PAIA" – Promotion of Access to Information Act No. 2 of 2000, as amended;
 - 1.4 "POPIA" – Protection of Personal Information Act No. 4 of 2013, as amended; and
 - 1.5 "Regulator" – Information Regulator established in terms of section 39 of POPIA.
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2. PURPOSE OF THIS MANUAL

This Manual is useful for the public to:

2.1 check the categories of records held by CaEFT which are available without a person having to submit a formal PAIA request.

2.2 have a sufficient understanding of how to make a request for access to a record of CaEFT, by providing a description of the subjects on which CaEFT holds records and the categories of records held on each subject.

2.3 know the description of the records of CaEFT which are available in accordance with any other legislation.

2.4 access all the relevant contact details of the IO and DIO (if any) who will assist the public with the records they intend to access.

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 know if CaEFT will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.

2.7 know the recipients or categories of recipients to whom the personal information may be supplied.

2.8 know if CaEFT has planned to transfer or process personal information outside South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.9 know whether CaEFT has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CaEFT

3.1 Information Officer

Name: SD Naidoo

Position: Information Officer

Tel: +27 21 565 0567

Email: admin@caeft.com

Postal Address: Raft House, 3 Monte Vista Boulevard, Monte Vista, 7460,
Cape Town, Western Cape, South Africa

3.2 Deputy Information Officer

Name: N/A

Tel: N/A

Email: N/A

3.3 Access to information general contacts

Email: admin@caeft.com

3.4 Head Office

Postal Address: Raft House, 3 Monte Vista Boulevard, Monte Vista, 7460,
Cape Town, Western Cape, South Africa

Physical Address: Raft House, 3 Monte Vista Boulevard, Monte Vista, 7460,
Cape Town, Western Cape, South Africa

Telephone: +27 21 565 0567

Email: admin@caeft.com

Website: <https://caeft.com/>

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1 The Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The Guide is available in each of the official languages and in braille.

4.3 The Guide contains, among other things, a description of:

4.3.1 the objects of PAIA and POPIA.

4.3.2 the contact details of the IOs and DIOs of public bodies.

4.3.3 the manner and form of a request for access to a record of a public body (section 11 of PAIA) and a private body (section 50 of PAIA);

- 4.3.4 the assistance available from IOs of public bodies and from the Regulator.
 - 4.3.5 the remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA.
 - 4.3.6 the provisions of sections 14 and 51 of PAIA requiring public and private bodies, respectively, to compile a manual, and how to obtain access to a manual.
 - 4.3.7 the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by public and private bodies, respectively.
 - 4.3.8 the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
 - 4.3.9 the regulations made in terms of section 92 of PAIA, as amended.
 - 4.4 Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal working hours.
 - 4.5 The Guide can also be obtained:
 - 4.5.1 upon request to the IO; or
 - 4.5.2 from the website of the Regulator (<https://infoeregulator.org.za/>).
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5. CATEGORIES OF RECORDS OF CaEFT WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

- 5.1 Records of a public nature, typically those disclosed on CaEFT's website, are automatically available and need not be formally requested in terms of this Manual. These include, for example:
- 5.1.1 company information published on the website;
 - 5.1.2 descriptions of services and general terms and conditions;
 - 5.1.3 contact information; and
 - 5.1.4 this Manual.
- 5.2 Other records, such as statutory records maintained at the Companies and Intellectual Property Commission (CIPC), may be accessed directly from CIPC without the need to submit a formal application to CaEFT. An appointment to view CaEFT's internal records that are not automatically available will still have to be made with the Information Officer.
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6. RECORDS OF CaEFT WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

- 6.1 Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation:
- 6.1.1 Basic Conditions of Employment Act 75 of 1997;
 - 6.1.2 Companies Act 71 of 2008;
 - 6.1.3 Consumer Protection Act 68 of 2008;
 - 6.1.4 Electronic Communications and Transactions Act 25 of 2002;
 - 6.1.5 Employment Equity Act 55 of 1998;
 - 6.1.6 Income Tax Act 58 of 1962;
 - 6.1.7 Labour Relations Act 66 of 1995;

- 6.1.8 Occupational Health and Safety Act 85 of 1993;
 - 6.1.9 Protection of Personal Information Act 4 of 2013;
 - 6.1.10 Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002; and
 - 6.1.11 Value Added Tax Act 89 of 1991.
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7. DESCRIPTION OF THE SUBJECTS ON WHICH CaEFT HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CaEFT

Company Records

(All records related to the incorporation and administration of CaEFT)

- Incorporation documents (Memorandum of Incorporation, articles of association);
- Financial records.
- Operational records.
- Intellectual property records.
- Marketing records.
- Internal correspondence.
- Service records.
- Statutory records.
- Internal policies and procedures; and
- Minutes of meetings.

Personnel Records

For the purposes of this section, “personnel” means any person who works for or provides services to or on behalf of CaEFT and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of CaEFT. This includes directors, all permanent, temporary and part-time staff as well as consultants and contract workers.

- Any personal records provided to CaEFT by its personnel.
- Any records a third party has provided to CaEFT about any of their personnel.
- Conditions of employment and other personnel-related contractual and quasi-legal records.
- Employment policies and procedures.
- Internal evaluation and disciplinary records; and
- Other internal records and correspondence.

Other Third-Party Records

Records are kept in respect of other parties, including without limitation, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to CaEFT.

- Personnel, client, or CaEFT records which are held by another party as opposed to being held by CaEFT; and
- Records held by CaEFT pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the other party.

Other Records

- Information relating to CaEFT; and
 - Research information belonging to CaEFT or carried out on behalf of a third party.
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8. PROCESSING OF PERSONAL INFORMATION

8.1 Lawful basis for processing

8.1.1 CaEFT processes personal information on one or more of the lawful bases set out in section 11 of POPIA, including:

- 8.1.1.1 the data subject's consent;
- 8.1.1.2 processing necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;
- 8.1.1.3 compliance with legal obligations; and
- 8.1.1.4 CaEFT's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of data subjects.

8.2 Purpose of processing personal information

8.2.1 The purpose of processing personal information is:

- 8.2.1.1 to provide you with information, products or services you request from CaEFT;
- 8.2.1.2 to refer you to an appropriate third-party service provider;
- 8.2.1.3 to communicate with you;
- 8.2.1.4 to provide you with support; and
- 8.2.1.5 to provide effective advertising (for example to provide you with news, special offers and general information about other services and events which CaEFT offers, that are similar to those that you have already procured or enquired about).

8.3 Categories of data subjects and personal information

8.3.1 Categories of data subjects:

- 8.3.1.1 visitors of CaEFT's website;
- 8.3.1.2 people who make use of CaEFT's services; and
- 8.3.1.3 all data subjects whose personal information is processed by CaEFT.

8.3.2 Categories of personal information collected by CaEFT:

- 8.3.2.1 name and surname;
- 8.3.2.2 contact number and email address;
- 8.3.2.3 physical address;
- 8.3.2.4 identity or passport number;
- 8.3.2.5 date of birth;
- 8.3.2.6 bank details;
- 8.3.2.7 payment and transaction information;
- 8.3.2.8 log files;
- 8.3.2.9 cookies and web beacons;
- 8.3.2.10 information CaEFT infers about you based on your interaction with products and services;
- 8.3.2.11 device information (for example the type of device you are using, how you access platforms, your browser or operating system and your internet protocol address); and
- 8.3.2.12 location information.

8.4 Recipients or categories of recipients

8.4.1 CaEFT may share your information with and/or supply your information to:

- 8.4.1.1 other companies which are affiliated with CaEFT;
- 8.4.1.2 a limited number of CaEFT's employees and third-party service providers (other than those to whom CaEFT refers you), who interact with you on CaEFT's behalf;
- 8.4.1.3 other parties in response to a legal or regulatory obligation CaEFT may have;
- 8.4.1.4 other parties when CaEFT performs an obligation it has towards you;
- 8.4.1.5 other parties in response to legal process or when necessary to enforce or protect CaEFT's legal rights;
- 8.4.1.6 third parties that provide services to CaEFT (third parties that provide services to CaEFT or act on CaEFT's behalf may have access to information about you. These third-party service providers are contractually limited in their ability to use information they receive in the course of providing services to you or CaEFT);
- 8.4.1.7 third parties where you provide explicit consent. In some cases, third parties may wish to obtain information about you in order to promote their products to you, or for other lawful purposes. CaEFT may share information with such third parties only where you provide explicit consent. Before CaEFT asks you to consent, CaEFT will provide you with a clear description of what data would be shared with the third party and for what purpose; and
- 8.4.1.8 third parties in the course of a business transfer (where all or a part of CaEFT's business is merged, sold or reorganised, personal information about you may be shared with the successor entity. CaEFT will use reasonable measures to help ensure that any successor entity processes personal information in accordance with applicable data protection laws).

8.5 Planned transborder flows of personal information

8.5.1 CaEFT may transfer your personal information to places outside of South Africa and store it there, where CaEFT's third-party service providers might process it. Any such transfer will be conducted in accordance with section 72 of POPIA and CaEFT's privacy policy and will include appropriate safeguards to protect your personal information.

8.6 Data subject rights

8.6.1 In terms of POPIA, data subjects have the right to:

- 8.6.1.1 request confirmation of whether CaEFT holds personal information about them;
- 8.6.1.2 request access to their personal information;
- 8.6.1.3 request correction or deletion of personal information;
- 8.6.1.4 object to the processing of personal information; and
- 8.6.1.5 lodge a complaint with the Information Regulator.

8.7 Retention

8.7.1 CaEFT retains personal information only for as long as necessary to fulfil the purposes for which it was collected or as required or permitted by law.

8.8 Information security

8.8.1 CaEFT takes appropriate technical and organisational information security measures to ensure the confidentiality, integrity and availability of personal information in its possession and to protect it against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures include, where appropriate, access controls and user authentication, encryption of sensitive data, regular security assessments and updates, contractual obligations on service providers, and staff training on data protection.

9. HOW TO REQUEST ACCESS TO RECORDS

9.1 A request for access to a record of CaEFT must be made on Form 2 (Request for Access to Record of Private Body) as prescribed in terms of section 53(2)(a) of PAIA and the Regulations.

9.2 Form 2 is available from the Information Regulator's website (<https://info regulator.org.za/>) or on request from CaEFT's Information Officer.

9.3 The completed Form 2 must be submitted to the Information Officer at the contact details set out in clause 3 above, by email, post or hand delivery.

9.4 The requester must provide sufficient detail to enable CaEFT to identify the record(s) requested and the requester must indicate the form of access required.

9.5 CaEFT will process the request and notify the requester of its decision within 30 (thirty) days of receipt of a valid request, or such extended period as permitted in terms of section 57 of PAIA.

10. FEES PAYABLE FOR ACCESS TO RECORDS

10.1 Fees are payable in accordance with the Regulations regarding the Promotion of Access to Information, including Annexure A (request and access fees) and Annexure B (fees for copies of the Manual).

10.2 A request fee may be payable by a requester who is not a personal requester (i.e. a requester seeking access to records containing information about a third party).

10.3 Access fees may be charged for the time required to search for and prepare the record(s) and for the cost of making copies and sending the record(s) to the requester.

10.4 No request fee is payable by a personal requester seeking access to records containing personal information about that requester.

11. GROUNDS FOR REFUSAL OF ACCESS

11.1 CaEFT may refuse a request for access to records on any of the grounds set out in Chapter 4 of Part 3 of PAIA, including (without limitation):

- 11.1.1 protection of the privacy of third parties (section 63);
- 11.1.2 protection of commercial information of third parties (section 64);
- 11.1.3 protection of confidential information of third parties (section 65);
- 11.1.4 protection of the safety of individuals and property (section 66);
- 11.1.5 protection of records privileged from production in legal proceedings (section 67);
- 11.1.6 protection of CaEFT's commercial information (section 68); and
- 11.1.7 protection of research information (section 69).

11.2 If a request is refused, CaEFT will provide written reasons for the refusal as required by section 56(3) of PAIA.

12. REMEDIES AVAILABLE TO REQUESTERS

12.1 A requester whose request for access has been refused, or who is aggrieved by a decision of CaEFT, may lodge a complaint with the Information Regulator in terms of section 74 of PAIA and/or may apply to a court for appropriate relief.

12.2 The contact details of the Information Regulator are available at <https://info regulator.org.za/>.

13. AVAILABILITY OF THE MANUAL

13.1 A copy of this Manual is available:

13.1.1 on <https://caeft.com/>;

13.1.2 at the head office of CaEFT for public inspection during normal business hours;

13.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

13.1.4 to the Regulator upon request.

13.2 A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

14. UPDATING OF THE MANUAL

14.1 CaEFT may update this Manual from time to time as required by law or as circumstances change.

14.2 The current version of this Manual will always be available on CaEFT's website.

Issued by

SD Naidoo
Information Officer
CaEFT Proprietary Limited

Date: 1/02/2026