

PAIA and PoPIA Manual

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 (PAIA) and to address requirements of the Protection of Personal Information Act, 2013 ("PoPIA")

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1. Who is HURU?

HURU Technologies (Pty) Ltd “HURU” is a for-profit South African business registered under the Companies Act 71 of 2008.

HURU is a Private Body for purposes of both PAIA and PoPIA.

2. Contact details

| Section 51(1)(a) | |
|--|---|
| Physical & Postal Address | Unit F04. Kieprsol House, Stonemill Office Park 300 Acacia Road Darrenwood 2195, Johannesburg, Gauteng |
| Email address | support@huru.co.za |
| Telephone | 010 593 4491 |
| Website address | https://huru.co.za |
| Information Officer in terms of Section 51(1)(b) | |
| Information Officer | Adrian Albrecht |
| Physical & Postal Address | Unit F04. Kieprsol House, Stonemill Office Park 300 Acacia Road Darrenwood 2195, Johannesburg, Gauteng |
| Email address | info-officer@huru.co.za |

3. Why this manual?

- 3.1. In terms of section 51 of the Act, all Private Bodies are required to compile an Information Manual (“PAIA Manual”).
- 3.2. Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and / or regulatory requirements, except where the Act expressly provides that the information may be adopted when

requesting information from a public or private body.

- 3.3. The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability within HURU by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 3.4. To promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in relation to public and private bodies.
- 3.5. Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
 - 3.5.1. Limitations aimed at the reasonable protection of privacy.
 - 3.5.2. Commercial confidentiality.
 - 3.5.3. Effective, efficient, and good governance.
 - 3.5.4. And in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.
- 3.6. This Manual complies with the requirements of guide mentioned in **section 10 of the PAIA** and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its regulations by private and public bodies.
<https://www.sahrc.org.za/index.php/understanding-paia> ¹

¹ The Guide will be replaced by the Information Regulator which assumes the duties of the SAHRC from the 01" July 2021.

3.7. Information Regulator Contact Details

| | |
|------------------|--|
| Physical Address | JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001. P.O Box 31533, Braamfontein, Johannesburg, 2017 |
| Telephone | 010 023 5241/42 |
| General Email | enquiries@info regulator.org.za |
| Complaints | PAIAComplaints@info regulator.org.za POPIAComplaints@info regulator.org.za |
| Website | https://info regulator.org.za/ |

3.8. If a public body lodges a request, the public body must be acting in public interest.

3.9. 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 sections 6 and 7 of PAIA. Rates are described in [Appendix 15.1](#)

4. Availability of this manual

This Manual is made available in terms of section 4 of the Regulations to POPIA.

This Manual is also available on our website which is: <https://huru.co.za/legal/>

This Manual is further available at our offices for inspection during business hours.

5. What records does HURU hold?

Section 51(1) (d)

5.1 Records held by HURU.

Although we will handle each request on an individual basis for quick reference most of our records have been marked with the likelihood of being accessible.

| | |
|-----|---|
| S1 | Public record |
| S68 | Section 68 and may be refused as they are Commercial information of a private body |
| S69 | Section 69 and may be refused - Mandatory protection of research information of a third party |
| S64 | Section 64 Mandatory protection of commercial information of third-party protection of research information of a private body |

| | | |
|--------|--|----|
| Public | <ul style="list-style-type: none">• Incorporation and company registration• Trust deeds• Media releases• Trademarks | S1 |
|--------|--|----|

| | | |
|--------------------|--|-----|
| Company Records | <ul style="list-style-type: none"> • Minutes of meetings of the Board of Directors; Minutes of meetings of Shareholders. • Proxy forms. • Register of debenture-holders; Register of directors' shareholdings; Share certificates. • Share Register and other statutory registers and/or records and/or documents. • Special resolutions/Resolutions passed at General and Class meetings. • Records relating to the appointment of Auditors. • Directors; Prescribed Officer. Public Officer; and • Secretary • Audit reports. • Risk management frameworks; and Risk management plans. | S68 |
| Financial Records | <ul style="list-style-type: none"> • Accounting Records; Annual Financial Reports. • Annual Financial Statements, Asset Registers. • Bank Statements. • Banking details and bank accounts. • Banking Records. • Debtors / Creditors statements and invoices; General ledgers and subsidiary ledgers; General reconciliation. • Invoices. • Justifications • Policies and procedures; Rental Agreement. | S68 |
| Income Tax Records | <ul style="list-style-type: none"> • PAYE Records. • Documents issued to employees for income tax purposes; Records of payments made to SARS on behalf of employees; All other statutory compliances: • VAT • Regional Services Levies; Skills Development Levies; UIF • Workmen's Compensation | S68 |

| | | |
|-------------------------------|---|----------|
| Personnel Documents & Records | <ul style="list-style-type: none"> • Address Lists. • Disciplinary Code and Records. • Employment Contracts. • Grievance Procedures • Leave Records. • Payroll reports/ Wage register; • Safety, Health and Environmental records • Salary Records. • SETA records • Standard letters and notices • Training Manuals. • Training Records. | S68 |
| Procurement | <ul style="list-style-type: none"> • Standard Terms and Conditions for supply of services and products • Contractor, client, and supplier agreements. • Lists of suppliers, products, services, and distribution; and | S68 |
| IT Department | <ul style="list-style-type: none"> • Computer / mobile device usage policy documentation; Disaster recovery plans. • Hardware asset registers. • Information security policies/standards/procedures; Information technology systems and user manuals • Information usage policy documentation. • Project implementation plans; Software licensing; and • System documentation and manuals. • Policies and Procedures. • Source code | S68, S69 |
| Sales & Marketing | <ul style="list-style-type: none"> • Customer details • Credit application information • Information and records provided by a third party. • Advertising and promotional | S69 |

Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA manual. Amongst other, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before HURU will consider access.

6. Records Available without a *Request to Access*

- 6.1. Records of a public nature, typically those disclosed on the HURU website and in its various annual reports, may be accessed without the need to submit a formal application.
- 6.2. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

7. Applicable legislation

Section 51(1) (c)

- 7.1. Where applicable to its operations, HURU also retains records and documents in terms of the legislation described in [Appendix 15.2](#). Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act; the below mentioned legislation and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be done in accordance with the prescriptions of the Act.
- 7.2. It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this Manual.

8. How do you request access to information?

Section 51(1) (e)

- 8.1. The requester must comply with all the procedural requirements contained within section 53 of PAIA relating to the request for access to a record.
- 8.2. The requester must complete the prescribed [Form 1 found in Appendix 16.1](#), and submit same as well as payment of a request fee and a deposit (if applicable) to the Information Officer or the Deputy Information Officer at the postal or physical address or electronic mail address as noted in [Contact Details](#) above.
- 8.3. The prescribed form must be filled in with sufficient information to enable the Information Officer to identify:
- a. the record or records requested; and
 - b. the identity of the requester.
- 8.4. The requester should indicate which form of access is required and specify a postal address or email address of the requester in the Republic.
- 8.5. The requester must state that he/she requires the information to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requester must clearly specify why the record is necessary to exercise or protect such a right (section 53(2)(d)).

- 8.6. HURU will process the request within 30 (thirty) days, unless the requester has stated special reasons to the satisfaction of the Information Officer that circumstances dictate that the above time periods not be complied with.
- 8.7. The requester shall be advised whether access is granted or denied in writing. If, in addition, the requester requires the reasons for the decision in any other manner, the requester will be obliged to state which manner and the particulars required.
- 8.8. If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer (section 53(2)(f)).
- 8.9. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 8.10. The requester must pay the prescribed fee before any further processing can take place.
- 8.11. All information as listed in clause 11 herein should be provided and failing which the process will be delayed until the required information is provided. The prescribed time periods will not commence until the requester has furnished all the necessary and required information. The Information Officer shall sever a record, if possible, and grant only access to that portion requested and which is not prohibited from being disclosed.

9. What will it cost in terms of PAIA?

Section 51 (1) (f)

- 9.1.1. The Act provides for two types of fees, namely:
 - a. A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and is not refundable; and
 - b. An access fee, which is paid by all requesters if a request for access is granted. This fee is inclusive of costs involved by the private body in obtaining and preparing a record for delivery to the requester.
- 9.1.2. When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (section 54(1)).
- 9.1.3. 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 Information Officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be

payable if the request is granted.

- 9.1.4. The Information Officer shall withhold a record until the requester has paid the fees as indicated below.
- 9.1.5. A requester whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required more than the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.
- 9.1.6. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester.

10. Refusal of access to records

A private body such as HURU is entitled to refuse a request for information.

- 10.1. The main grounds for HURU to refuse a request for information relates to the:
 - a. mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic person, as included in the Protection of Personal Information Act 4 of 2013, which would involve the unreasonable disclosure of personal information of that natural or juristic person.
 - b. mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory, or contractual agreements, comply with the provisions of the Protection of Personal Information Act 4 of 2013.
 - c. mandatory protection of the commercial information of a third party (section 64) if the record contains:
 - i. trade secrets of the third party.
 - ii. financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party.
 - iii. information disclosed in confidence by a third party to HURU if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
 - d. mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement.
 - e. mandatory protection of the safety of individuals and the protection of property (section 66).

- f. mandatory protection of records which would be regarded as privileged in legal proceedings(section 67).
- 10.1.2. The commercial activities (section 68) of a private body, such as HURU, which may include:
- a. trade secrets of HURU.
 - b. financial, commercial, scientific, or technical information which disclosure could likely causeharm to the financial or commercial interests of HURU.
 - c. information which, if disclosed could put HURU at a disadvantage in negotiations or commercial competition.
 - d. a computer program which is owned by HURU, and which is protected by copyright.
 - e. the research information (section 69) of HURU or a third party, if its disclosure would disclose the identity of HURU, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- 10.1.3. Requests for information that are clearly frivolous or vexatious, or which involve anunreasonable diversion of resources shall be refused.
- 10.1.4. All requests for information will be assessed on their own merits and in accordance with theapplicable legal principles and legislation.
- 10.1.5. If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a requestfor access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

11. What can you do when HURU refuses a request?

11.1 Internal Remedies

HURU does not have internal appeal procedures. The decision made by the Information Officer is final. Requesters 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.

11.2 External Remedies

11.2.1 A requestor that is dissatisfied with the Information Officer's refusal to disclose

information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

- 11.2.2 A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development, and which is presided over by a designated Magistrate.

12. Prerequisites to access records held by us.

12.1 Records held by HURU may be accessed by requests only once the prerequisite requirements for access have been met.

12.2 A requester is any person making a request for access to a record of HURU. There are two types of requesters:

- a. Personal Requester
 - i. A personal requester is a requester who is seeking access to a record containing personal information about the requester.
 - ii. HURU will voluntarily provide the requested information or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged.
- b. Other Requester
 - i. This requester (other than a personal requester) is entitled to request access to information on third parties.
 - ii. In considering such a request, HURU will adhere to the provisions of the Act. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that he/she may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the Information.

HURU is not obliged to voluntarily grant access to such records. The requester must fulfil the prerequisite requirements, in accordance with the requirements of the Act and as stipulated in Chapter 5; Part 3, including the payment of a request and access fee.

13. How long does the process take?

- 13.1. HURU will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
 - a. The 30 (thirty) day period within which HURU has to decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large number of information, or the request requires a search for information held at another office of HURU and the information cannot reasonably be obtained within the original 30 (thirty) day period.
 - b. HURU will notify the requester in writing should an extension be sought.

14. Protection of Personal Information that is Processed by HURU (PoPIA)

- 14.1 Protection of Personal Information Act no. 4 of 2013 provides that data subjects have the right to know what personal information HURU has about them, what it is used for, recipients or categories of recipients, whether it is transferred overseas. These are set out in [Appendix \(PoPIA Records\)](#) contained herein.
- 14.2 If you are a data subject, you have the right to:
 - Access personal information, use [\(Form 1, 16.1\)](#)
 - Object to the use of your Personal information [\(Form 2, 16.2\)](#)
 - To request a deletion / correction of your records [\(Form 3, 16.3\)](#)
- 14.3 You also have a right to know what security measures we have in place at HURU.
- 14.4 Chapter 3 of PoPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in PoPIA.
- 14.5 HURU needs Personal Information relating to both individual and juristic persons to carry out its business and organisational functions. The way this information is Processed and the purpose for which it is Processed is determined by HURU. HURU is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:
 - 14.5.1 is processed lawfully, fairly, and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by HURU, in the form of privacy or data collection notices. HURU must also have a legal basis (for example, consent) to process Personal Information.
 - 14.5.2 is processed only for the purposes for which it was collected.
 - 14.5.3 will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

- 14.5.4 is adequate, relevant and not excessive for the purposes for which it was collected.
- 14.5.5 is accurate and kept up to date.
- 14.5.6 will not be kept for longer than necessary.
- 14.5.7 is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by HURU, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage.
- 14.5.8 is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - (a) be notified that their Personal Information is being collected by HURU. The Data Subject also has the right to be notified in the event of a data breach.
 - (b) know whether HURU holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual.
 - (c) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained personal information.
 - (d) object to HURU's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to HURU's record keeping requirements);
 - (e) object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and

- (f) 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 his/her or its personal information.

15. Appendixes

15.1 Fees

Where HURU has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

Request Fees

Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee in the amount of R50,00 is payable up-front before the institution will further process the request received.

| | |
|--|----------|
| Information in an A-4 size page photocopy or part thereof | R 1.10 |
| A printed copy of an A4-size page or part thereof | R 0.75 |
| A copy in computer-readable format, for example: Compact disc | R 70,00 |
| A transcription of visual images, in an A4-size page or part thereof | R 40,00 |
| A copy of visual images | R 60,00 |
| A transcription of an audio record for an A4-size page or part thereof | R 20,00 |
| A copy of an audio record *Per hour or part of an hour reasonably required for such search. | R 30,00* |

Access Fees

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act, or an exclusion is determined by the Minister in terms of section 54(8).

The applicable access fees which will be payable are

| | |
|--|----------|
| Information in an A-4 size page photocopy or part thereof | R 1.10 |
| A printed copy of an A4-size page or part thereof | R 0.75 |
| A copy in computer-readable format, for example: Compact disc | R 70,00 |
| A transcription of visual images, in an A4-size page or part thereof | R 40,00 |
| A copy of visual images | R 60,00 |
| A transcription of an audio record for an A4-size page or part thereof | R 20,00 |
| A copy of an audio record *Per hour or part of an hour reasonably required for such search. | R 30,00* |

Deposits

1. Where the institution receives a request for access to information held on a person other than the requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requester.
2. The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee.

Collection Fees

1. The initial "request fee" of R50,00 should be deposited into the bank account below and a copy of the deposit slip, application form and other correspondence / documents, forwarded to the Information Officer via email.
2. The officer will collect the initial "request fee" of applications received directly by the Information Officer via email.

3. All fees are subject to change as allowed for in the Act and therefore such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any changes in the fees prior to making a payment.

15.2 Applicable legislation

1. Auditing Professions Act, No 26 of 2005;
2. Basic Conditions of Employment Act, No 75 of 1997;
3. Broad-Based Black Economic Empowerment Act, No 75 of 1997;
4. Business Act, No 71 of 1991;
5. Companies Act, No 71 of 2008;
6. Compensation for Occupational Injuries & Diseases Act, 130 of 1993;
7. Competition Act, No.71 of 2008;
8. Constitution of the Republic of South Africa 2008;
9. Copyright Act, No 98 of 1978;
10. Customs & Excise Act, 91 of 1964;
11. Electronic Communications Act, No 36 of 2005;
12. Electronic Communications and Transactions Act, No 25 of 2002;
13. Employment Equity Act, No 55 of 1998;
14. Financial Intelligence Centre Act, No 38 of 2001;
15. Identification Act, No. 68 of 1997;
16. Income Tax Act, No 58 of 1962;
17. Intellectual Property Laws Amendment Act, No 38 of 1997;
18. Labour Relations Act, No 66 of 1995;
19. Long Term Insurance Act, No 52 of 1998;
20. Occupational Health & Safety Act, No 85 of 1993;
21. Pension Funds Act, No 24 of 1956;
22. Prescription Act, No 68 of 1969;
23. Prevention of Organised Crime Act, No 121 of 1998;
24. Promotion of Access to Information Act, No 2 of 2000;
25. Protection of Personal Information Act, No. 4 of 2013;
26. Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
27. Revenue laws Second Amendment Act. No 61 of 2008;
28. Skills Development Levies Act No. 9 of 1999;
29. Short-term Insurance Act No. 53 of 1998;
30. Trust Property Control Act 57 of 1988
31. Unemployment Insurance Contributions Act 4 of 2002;
32. Unemployment Insurance Act No. 30 of 1966;
33. Value Added Tax Act 89 of 1991.

15.3 PoPIA Records

We use your personal information only for the purpose for which it is collected. Among others, this purpose could be to provide a service, assist us with administration, recruit prospective employees or even to comply with a legal obligation. We may use your personal information for other similar purposes, including marketing and communications, but that will only occur in the case where we have your consent or another lawful justification for doing so.

15.3.1 Purposes for processing

Lawful reasons

| | |
|----|--|
| R1 | To provide, conclude a contractual obligation that a data subject is part of |
| R2 | For purposes of making a hiring decision, employment processing that a data subject is part of |
| R3 | For a legal agreement that a data subject is part of |

Retention Periods

| | |
|---|--|
| A | Deleted upon conclusion of the service |
| B | Until no longer required by any legislation or purposes of proof |
| C | Indefinite |

Prospective Employees

| Processing | Category | What information is processed | Reason | |
|-------------|-----------------|---|--------|---|
| Recruitment | Natural Persons | Names; contact details; physical and postal addresses; date of birth; ID number/Identifier, education and employment history, Confidential Correspondence, Criminal behaviour | R2 | A |

From customer to provide products and services

| Processing | Category | What information is processed | Reason | |
|------------|-----------------------------|---|--------|---|
| Services | Natural Persons | Names; contact details; physical and postal addresses; date of birth; ID number/Identifier, banking information, Confidential Correspondence, Biometric fingerprints, Facial image, criminal behaviour | R1 | B |
| | Juristic Persons / Entities | Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; vat number, banking information, Confidential Correspondence | | |

From Contracted Service Providers

| Processing | Category | What information is processed | Reason | |
|--|---|---|--------|---|
| <ul style="list-style-type: none"> 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 Huru's data's regulatory and other obligations; and Any other reasonably required purpose relating to the HURU business. | Natural Persons & Juristic Persons / Entities | Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; banking information. BEEE Records, Confidential Correspondence | R3 | B |

From Employees to comply with legislation while under employ

| Processing | Category | What information is processed | Reason | |
|---|-----------------------|--|--------|---|
| <ul style="list-style-type: none"> Communicating Complying with the HURU's regulatory and other obligations Performing other administrative and operational purposes | Employees / Directors | Gender; pregnancy status; marital status; colour, race; age; language; education information; financial information; employment history; ID number/Identifier. physical and postal address; banking information, | R1 | B |

| | | | | |
|--|--|---|--|--|
| <ul style="list-style-type: none"> • Verification of applicant employees' information during recruitment process • General matters relating to employees: Pension, Medical aid, Payroll, Disciplinary action, Training | | Confidential Correspondence, Facial image, criminal behaviour | | |
|--|--|---|--|--|

15.3.2 In general, what information do we collect.

If you visit our website, your browser transmits some data automatically, such as your browsers information, operating system and date & times, the data transmitted and your IP address. At all times we only collect the minimum amount of information that is relevant to the purpose. If you interact with us on the internet, the personal information we collect depends on whether you just visit our website or, use our services.

| Personal Information | Special Personal Information |
|---|--|
| <ul style="list-style-type: none"> • Physical address • Cellular phone number • Suth African ID Number or Passport Number • Telephone number • Confidential Correspondence • Email address • Financial & banking details • Location information • Education history • Employment history • Name, together with other identifying information | <ul style="list-style-type: none"> • Criminal behaviour – allegations • We comply with section 33 of PoPIA with provisions concerning a data subject's criminal behaviour or biometric information. • We comply section 29 of PoPIA with provisions concerning a data subject's race or ethnic origin. • HURU has Prior Authorisation as per section 57(1) and 58(1) |

15.3.3 Possible recipients of Person Information

- Any juristic entity that HURU uses to collect payments and recover debts or to provide a service on its behalf.
- Credit bureaus that we obtain some services from
- AFISwitch whom process criminal record checks on behalf of SAPS
- SAPS, South African Police Services
- Any other juristic entity that provides HURU with products or services.
- Any payment systems HURU uses.
- Regulatory and governmental authorities or ombudsmen, or other authorities, including taxauthorities, where HURU 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.

15.3.4 Cross border transfers of Personal Information

HURU's Online Platform and Services are operated and managed on servers located and operated within the Republic of South Africa. If we transfer your personal information outside of South Africa, we apply the necessary safeguards which include, confirming whether the receiving country has the proper data protection law, ensuring that there is a binding agreement between parties or, if the transfer is internal to our organisation, commitment to binding corporate rules. Details of these safeguards may be obtained by contacting us directly.

By using and accessing our Services, Users who reside or are in countries outside of South Africa agree and consent to the transfer to and processing of their Personal Information on servers located outside of the country where they reside, and that the protection of such information may be different than required under the laws of their residence or location.

15.3.5 What security measures are taken?

HURU 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. HURU may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

1. Access Control of Persons

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

2. Data Media Control

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

3. Data Memory Control

HURU 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

HURU 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

HURU represents that the persons entitled to use HURU's 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

HURU shall be obliged to enable the verification and tracing of the locations / destinations to which the personal information is transferred by utilization of HURU's data communication equipment / devices.

7. Transport Control

HURU 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

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

9. Risk Control

HURU regularly reviews its security measures to assess for new security risks and constantly updates its security measures accordingly.

16. Forms

16.1 Form 1 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)

[Regulation 10]

A. Attention

| | |
|---------------------------|---|
| Information Officer | Adrian Albrecht |
| Deputy | |
| Physical & Postal Address | Unit F04. Kieprsol House, Stonemill Office Park 300 Acacia Road Darrenwood 2195, Johannesburg, Gauteng |
| Email address | Info-officer@huru.co.za |
| Telephone number | 010 593 4491 |

B. Particulars of person requesting access to the record.

- The particulars of the person who requests access to the record must be given below.
- The address and/or fax number in the Republic to which the information is to be sent must be given.
- 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 | (|) | | | | | | | | | | | |
| E-mail address | | | | | | | | | | | | | |

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

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

Form 16.1 continued...

| | | |
|--|---------|--|
| Full names and surname / Company name | | |
| Identity number / Registration Number | | |
| Postal address | | |
| Telephone number | () | |
| E-mail address | | |

D. Particulars of record

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.

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

a. Description of record or relevant part of the record

b. Reference number, if available

Form 16.1 continued...

c. Any further particulars of record

E. Fees

- 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.
- You will be notified of the amount required to be paid as the request fee.
- 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.
- 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 forin 1 to 4 below, state your disability and indicate in which form the record is required.

| | |
|---------------|--|
| Disability | |
| Form required | |

Mark the appropriate box with an X

Notes

- Compliance with your request for access in the specified form may depend on the form in which therecord is available.
- Access in the form requested may be refused in certain circumstances. In such a case you will beinformed if access will be granted in another form.
- The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

| | | | | | |
|--|---|--|--|--|-----------------------------|
| If the record is in written or printed form | | | | | |
| | copy of record* | | inspection of record | | |
| 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 ofthe images* |
| If record consists of recorded words or information which can be reproduced in sound | | | | | |
| | listen to the soundtrack (audio cassette) | | transcription of soundtrack* (written or printed document) | | |

| 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* (compactdisc) |

| | | |
|---|-----|----|
| *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.

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

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

Form 15.1 continued...

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 | | On this the | | Day of | | |
| Signature | | | | | | |
| Requester / Person on Whose Behalf Request is | | | | | | |
| Full name | | | | | | |

16.2 Form 2 Objection to the Processing of Personal Information in terms of Section 11(3) of the Protection of Personal Information Act, 2013

Regulation 3(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*

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

REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f)

Please provide detailed reasons for the objection

| | | | | | | |
|-----------|--|-------------|--|--------|--|--|
| Signed at | | On this the | | Day of | | |
| Signature | | | | | | |
| Full Name | | | | | | |

16.3 Form 3 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

Regulation 3(2)

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.

| Details of Data Subject | |
|---|--|
| Name(s) and surname / Registered name of data subject: | |
| Unique Identifier/ Identity Number | |
| Residential, postal or business address: | |
| Contact number(s): | |
| Fax number / E-mail address: | |
| DETAILS OF RESPONSIBLE PARTY | |
| Name(s) and surname/ registered name of data subject: | |
| Residential, postal or business address: | |
| Contact number(s): | |

| | |
|------------------------------|--|
| Fax number / E-mail address: | |
|------------------------------|--|

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.

Please provide details of the request

| | | | | | |
|------------------|--|-------------|--|--------|--|
| Signed at | | On this the | | Day of | |
| Signature | | | | | |
| Full Name | | | | | |