

## **THE PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL**

This PAIA Manual has been prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000

## 1. PREAMBLE

The Promotion of Access to Information Act, 2000 ("PAIA"), which came into effect on 9 March 2001, gives effect to the Constitutional right of access to information. It entitles natural and juristic persons to access records held by Public and Private Bodies, subject to certain limitations, where such information is required for the exercise or protection of a right. Where a request in terms of PAIA is made to a Private Body, that Private Body must disclose the requested information if the requester is able to prove that the record is required for the exercise or protection of any rights and provided that no grounds for refusal contained in PAIA apply. PAIA prescribes the procedural requirements that must be followed when submitting requests for access to information.

Section 51 of PAIA obliges Private Bodies to compile a manual to enable a person to obtain access to information held by such body and stipulates the minimum requirements that the manual must comply with.

This Manual constitutes ASSA ABLOY's PAIA manual and is compiled in accordance with section 51 of PAIA as amended by the Promotion of Access to Information Amendment Act, 2019 and the Protection of Personal Information Act, 2013 ("POPIA") which gives effect to a Data Subjects' Constitutional right to privacy and largely commenced on 1 July 2020. It promotes the protection of Personal Information processed by Public and Private Bodies and includes certain conditions to establish minimum requirements for the Processing of Personal Information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of Personal Information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of Personal Information and to provide for matters concerned therewith.

This PAIA manual also includes information on the submission of objections to the Processing of Personal Information and requests to correct, delete, destroy or restrict access to Personal Information or records thereof in terms of POPIA and the related Regulations.

This Manual must be read together with ASSA ABLOY's internal governance framework, including the Privacy Policy, Records Retention and Destruction Policy, Information Security Policy, and Incident Response Plan.

## 2. DEFINITIONS

<b>ASSA ABLOY</b>	ASSA ABLOY HOLDINGS (SA) LTD including our South African subsidiaries ASSA ABLOY (SA) (PTY) LTD, INHEP ELECTRONICS HOLDINGS (PTY) LTD, HYYP (PTY) LTD, IMPRO TECHNOLOGIES (PTY) LTD, TRAKA AFRICA (PTY) LTD, AMECOR (PTY) LTD and other brands such as ALCEA, Traka, VingCard, Mul-T-Lock, Yale, IDS, HYYP, FSK and Sabre Networks which are trading under the above-mentioned subsidiaries
<b>ASSA ABLOY Group</b>	The Swedish multinational group of companies known as ASSA ABLOY

<b>B-BBEE</b>	Broad-Based Black Economic Empowerment Act, 53 of 2003
<b>CIPC</b>	The Companies and Intellectual Property Commission (South Africa)
<b>Conditions for Lawful Processing</b>	The conditions for lawful processing of Personal Information as fully set out in chapter 3 of POPIA
<b>Data Subject</b>	The person to whom Personal Information relates
<b>Information Officer (IO)</b>	<p>Means, in relation to:</p> <ul style="list-style-type: none"> <li>- a Public Body, an information officer or deputy information officer as contemplated in terms of section 1 or 17 of POPIA; and</li> <li>- a Private Body, the head of a private body as contemplated in section 1 of PAIA.</li> </ul> <p>The individuals who have been identified in paragraph 6 (Contact Details) of this Manual have been appointed as the Information Officers or Deputy Information Officers for ASSA ABLOY</p>
<b>Information Regulator</b>	The independent body established in terms of section 39 of POPIA
<b>Manual</b>	This ASSA ABLOY PAIA manual
<b>PAIA</b>	The Promotion of Access to Information Act 2 of 2000 as amended
<b>PAIA Regulations</b>	The regulations promulgated in terms of section 92 of PAIA
<b>Personal Information</b>	<p>Means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:</p> <ul style="list-style-type: none"> <li>- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, Colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;</li> <li>- information relating to the education or the medical, financial, criminal or employment history of the person;</li> <li>- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</li> <li>- the biometric information of the person;</li> <li>- the personal opinions, views or preferences of the person;</li> <li>- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>- the views or opinions of another individual about the person; and</li> <li>- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person</li> </ul>
<b>Personnel</b>	Any person who works for or provides services to or on behalf of ASSA ABLOY, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the

	business of ASSA ABLOY, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers
<b>POPIA</b>	The Protection of Personal Information Act 4 of 2013
<b>POPIA Regulations</b>	The regulations promulgated in terms of section 112(2) of POPIA
<b>Privacy Statement</b>	ASSA ABLOY's privacy notice which sets out <i>inter alia</i> the type of Personal Information ASSA ABLOY collects and how this Personal Information is Processed
<b>Private Body</b>	Means – <ul style="list-style-type: none"> <li>- a natural person who carries or has carried on any trade, business or profession, but only in such capacity;</li> <li>- a partnership which carries or has carried on any trade, business or profession; or</li> <li>- any former or existing juristic person but excludes a public body</li> </ul>
<b>Processing</b>	Means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including: <ul style="list-style-type: none"> <li>- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;</li> <li>- dissemination by means of transmission, distribution or making available in any other form; or</li> <li>- merging, linking, as well as restriction, degradation, erasure or destruction of information</li> </ul>
<b>Public Body</b>	Means – <ul style="list-style-type: none"> <li>- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or</li> <li>- any other functionary or institution when: <ul style="list-style-type: none"> <li>• exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or</li> <li>• exercising a public power or performing a public function in terms of any legislation</li> </ul> </li> </ul>
<b>Request Procedure</b>	Means the procedure to request access to a record or information as set out in paragraph 13 of this Manual.
<b>SARS</b>	South African Revenue Service

### **3. PURPOSE OF THE PAIA MANUAL**

This PAIA Manual is intended for public use, and may be used for the following objectives:

- to check the categories of records held by ASSA ABLOY as well as which of these records are available from ASSA ABLOY without having to submit a formal PAIA request under this Manual;

- understanding how to make a request for access to a record of ASSA ABLOY, by providing a description of the subjects on which ASSA ABLOY holds records and the categories of records held on each subject;
- to get an understanding of the description of the records held by ASSA ABLOY as well as which of these records are available in accordance with any other legislation or regulatory framework;
- to access the relevant contact details for Information Officers and Deputy Information Officers who have been appointed to assist the public with any request to access records held by ASSA ABLOY;
- to be made aware of the guide on how to use PAIA, as issued and updated by the Information Regulator, as well as how to obtain access thereto;
- to be made aware of whether ASSA ABLOY will Process Personal Information, the purpose of Processing such Personal Information and the description of the categories of Data Subjects and of the information or categories of information relating thereto;
- to be made aware of the recipients or categories of recipients to whom Personal Information may be transferred;
- to understand whether ASSA ABLOY transfers or Processes Personal Information outside the Republic of South Africa and the recipients or categories of recipients to whom the Personal Information may be transferred; and
- to gain insight into ASSA ABLOY's security measures to ensure the confidentiality, integrity and availability of the Personal Information Processed.

## 4. ABOUT ASSA ABLOY

ASSA ABLOY South Africa is part of the multinational ASSA ABLOY group of companies, with its' ultimate holding company based in Sweden and registered on the Nasdaq Stockholm Stock Exchange. ASSA ABLOY offers the largest range of access solutions in the world. Our portfolio includes a complete range of solutions in areas such as mechanical and electromechanical locking, access control, identification technology, entrance automation, security doors, hotel security and mobile access.

Our impressive, state-of-the-art range of locks, keyless locking mechanisms, access control, door automatics, door hardware and bespoke intrusion solutions meet increasingly complex demands across diverse market sectors including hotels, hospitals, universities, schools, airports, corporate environments and residential homes as well as government facilities such as police stations, courts, correctional institutions, the defense industry, office parks and warehouses.

## 5. ORGANOGRAM

The most current governance structure and delegation of duties for Information Officers and Deputy Information Officers are maintained internally and may be made available on request from the Information Officer. Please refer to paragraph 6 (Contact Details) of this Manual for contact details and the Appendices attached to this Manual for the Information Regulator's prescribed forms.

## 6. CONTACT DETAILS

Company contact details in terms of PAIA section 51 are as follows:

LEGAL ENTITY	CONTACT DETAILS
<b>ASSA ABLOY Holdings (SA) Ltd; and ASSA ABLOY (SA) (Pty) Ltd ("AASA")</b>	<p>Address: 176 Progress Road, Technikon, Roodepoort, Johannesburg 1724</p> <p>P.O. Box: 146, Roodepoort, 1725</p> <p>Website: <a href="https://www.assaabloy.com/za/en">https://www.assaabloy.com/za/en</a> Switchboard: +27 11 761 5000 E-mail: <a href="mailto:za.info@assaabloy.com">za.info@assaabloy.com</a></p>
<b>Inhep Electronics Holdings (Pty) Ltd ("IDS"); and HYYP (Pty) Ltd</b>	<p>Address: Unit 1 Manchester Park 1 Manchester Road Pinetown 3610</p> <p>P.O. Box: 738, New Germany, 3620</p> <p>Website: <a href="https://www.idsprotect.co.za/za/en">https://www.idsprotect.co.za/za/en</a> Switchboard: +27 31 705 1373 E-mail: <a href="mailto:info@idsprotect.co.za">info@idsprotect.co.za</a></p>
<b>Impro Technologies (Pty) Ltd ("Impro")</b>	<p>Address: Unit 1 Manchester Park 1 Manchester Road Pinetown 3610</p> <p>P.O. Box: 15407, Westmead, 3605</p> <p>Website: <a href="https://www.impro.net/">https://www.impro.net/</a> Switchboard: +27 31 717 0700 E-mail: <a href="mailto:info@impro.net">info@impro.net</a></p>
<b>Amecor (Pty) Ltd ("FSK")</b>	<p>Address: Amecor House, 14 Richard Road, Industria North, Johannesburg 1709</p> <p>P.O. Box: 720, Florida Hills, 1716</p> <p>Website: <a href="https://www.fsk.co.za/">https://www.fsk.co.za/</a> Switchboard: +27 11 477 2600 E-mail: <a href="mailto:za.sales@fsk.co.za">za.sales@fsk.co.za</a></p>

<b>Traka Africa (Pty) Ltd</b>	Address: 1 Friesland Drive, Longmeadow Business Park, Modderfontein, 1609  Website: <a href="https://www.traka.com/global/en">https://www.traka.com/global/en</a> Switchboard: +27 11 761 5180 E-mail: <a href="mailto:info.traka.za@traka.com">info.traka.za@traka.com</a>
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## Duly authorised persons:

Legal entity	Information Officer	Data Privacy Protection Responsible
<b>ASSA ABLOY Holdings (SA) Ltd; and ASSA ABLOY (SA) (Pty) Ltd</b>	Gerrit Viviers E-mail: <a href="mailto:privacy.africa@assaabloy.com">privacy.africa@assaabloy.com</a>	Paul le Roux Telephone number: +27 11 761 5000 E-mail: <a href="mailto:privacy.africa@assaabloy.com">privacy.africa@assaabloy.com</a>
<b>Subsidiaries (for purposes of POPIA)</b>		
<b>Inhep Electronics Holdings (Pty) Ltd; and HYYP (Pty) Ltd</b>	Bridget Aves E-mail: <a href="mailto:privacy.africa@assaabloy.com">privacy.africa@assaabloy.com</a>	Luwayne Dalais Telephone number: +27 31 705 1373 E-mail: <a href="mailto:privacy.africa@assaabloy.com">privacy.africa@assaabloy.com</a>
<b>Impro Technologies (Pty) Ltd</b>	Giles Calenborne E-mail: <a href="mailto:privacy.africa@assaabloy.com">privacy.africa@assaabloy.com</a>	Darren McDowall Telephone number: +27 31 717 0700 E-mail: <a href="mailto:privacy.africa@assaabloy.com">privacy.africa@assaabloy.com</a>
<b>Amecor (Pty) Ltd</b>	Bridget Aves E-mail: <a href="mailto:privacy.africa@assaabloy.com">privacy.africa@assaabloy.com</a>	Jared Mc Farlane Telephone number: +27 11 477 2600 E-mail: <a href="mailto:privacy.africa@assaabloy.com">privacy.africa@assaabloy.com</a>
<b>Traka Africa (Pty) Ltd</b>	Mark Stoop E-mail: <a href="mailto:info.traka.za@traka.com">info.traka.za@traka.com</a>	Johan Oosthuizen Telephone number: +27 11 761 5180 E-mail: <a href="mailto:info.traka.za@traka.com">info.traka.za@traka.com</a>

Records of Information Officer and Deputy Information Officer appointments, delegation and registration with the Information Regulator are kept by Group Legal and may be made available on request.

## 7. INFORMATION REGULATORS' GUIDE

The Information Regulator has, in terms of section 10(1) of PAIA, as amended, 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.

The Guide is available in each of the official languages and in braille and contains a description of the following:

- 1) the objects of PAIA and POPIA;
- 2) the postal and street address, phone and fax number and, if available, electronic mail address of:
  - the Information Officer of every Public Body, and
  - every Deputy Information Officer of every Public and Private Body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- 3) the manner and form of a request for:
  - access to a record of a Public Body contemplated in section 11 of PAIA; and
  - access to a record of a Private Body contemplated in section 50 of PAIA;
- 4) the assistance available from the IO of a Public Body in terms of PAIA and POPIA;
- 5) the assistance available from the Information Regulator in terms of PAIA and POPIA;
- 6) all remedies available in law, regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
  - an internal appeal;
  - a complaint to the Information Regulator; and
  - an application with a court against a decision by the information officer of a Public Body, a decision on internal appeal, a decision by the Information Regulator or a decision of the head of a Private Body;
- 7) the provisions of sections 14 and 51 of PAIA, requiring a Public Body and Private Body, respectively, to compile a manual, and how to obtain access to a manual;
- 8) the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a Public Body and a Private Body, respectively;
- 9) the notices issued in terms of sections 22 and 54 of PAIA, regarding fees to be paid in relation to requests for access; and
- 10) the regulations made in terms of section 92 of PAIA.

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 Information Regulator during normal working hours.

The Guide may also be obtained upon request to the Information Officer of ASSA ABLOY using Form 1 (Appendix A), and has been made available by the Information Regulator on the Information Regulators' website at <https://info regulator.org.za/paia/>

Any enquiries regarding the Guide should be directed to the Information Regulator:

Postal Address:	Woodmead North Office Park 54 Maxwell Drive Woodmead Johannesburg
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Telephone Number:	+27 (0)10 023 5207
Toll free:	+27 (0) 80 001 7160
E-mail:	<a href="mailto:enquiries@inforegulator.co.za">enquiries@inforegulator.co.za</a>
Website:	<a href="http://www.inforegulator.org.za">www.inforegulator.org.za</a>

## **8. REQUESTS FOR ACCESS TO INFORMATION OR RECORDS HELD BY ASSA ABLOY**

ASSA ABLOY maintains records on the categories and subject matters listed in paragraphs 9 to 11 below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such record will be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA and the Request Procedure.

Records held by ASSA ABLOY as set out in paragraph 9 below are available without a person having to request access by following the Request Procedure but may be accessed via the company's website (where available) or requested telephonically or by sending an email or registered letter to ASSA ABLOY using the contact details as set out in paragraph 6 (Contact Details). All other requests for access to information or records will only be considered when received in accordance with the Request Procedure and any request for access to information which does not comply with the formalities as prescribed by PAIA and as set out in this Manual will be returned to the requester.

PAIA provides that a person may only request access to information if the information is required for the exercise or protection of a legitimate right. Information will therefore not be furnished unless a person provides sufficient particulars to enable ASSA ABLOY to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right.

The exercise of a requester's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance.

PAIA and the Request Procedure contained in this Manual may not be used for access to records for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.

Information Officers and Deputy Information Officers have been delegated the task of receiving and co-ordinating all requests for access to records in terms of PAIA, to ensure proper compliance with PAIA and POPIA. Information Officers will facilitate the liaison with internal legal teams on all requests received in terms of this Manual.

All requests in terms of PAIA and this Manual must be addressed to the relevant Information Officer using the details as set out in paragraph 6 (Contact Details) above.

POPIA Data Subject requests (e.g., access to, correction of, deletion, objection to, restriction, portability, and automated decision-making queries) must also be addressed to the Information

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Officer or relevant Deputy Information Officer as set out in paragraph 6 (Contact Details) above. The standard forms for these requests appear in Appendix D and Appendix E of this Manual.

## 9. CATEGORIES OF RECORDS HELD BY ASSA ABLOY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS IN TERMS OF THIS MANUAL

The below categories of records held by ASSA ABLOY are available without a person having to request access by completing Form 2 (Appendix B) but may be accessed via the company's website or requested telephonically or by sending an email or registered letter to ASSA ABLOY using the contact details as set out in paragraph 6 (Contact Details).

Categories of Records	Description of Records	Available on Website (Y/N)	Available upon request* (Y/N)
<b>ASSA ABLOY GROUP DOCUMENTS AND RECORDS</b>			
Group Steering Documents	<ul style="list-style-type: none"> <li>- ASSA ABLOY Annual Report;</li> <li>- ASSA ABLOY Code of Conduct;</li> <li>- ASSA ABLOY Business Partner Code of Conduct;</li> <li>- ASSA ABLOY Press Releases;</li> <li>- ASSA ABLOY Sustainability Reports</li> </ul>		Y
Group Policies	<ul style="list-style-type: none"> <li>- ASSA ABLOY Anti-Corruption Compliance Policy</li> <li>- ASSA ABLOY Environmental Sustainability Policy</li> <li>- ASSA ABLOY Cookie Policy</li> <li>- ASSA ABLOY Responsible Disclosure Policy</li> <li>- Whistle B (Whistleblowing Centre)</li> </ul>	These records are available on the ASSA ABLOY Group site and may be accessed electronically via <a href="https://www.assaabloy.com/group/en">https://www.assaabloy.com/group/en</a>	Y
Group Shareholder and Beneficial Owner Information	<ul style="list-style-type: none"> <li>- ASSA ABLOY Annual Report</li> <li>- List of Largest Shareholders</li> </ul>		Y
Group Data Privacy Documents	<ul style="list-style-type: none"> <li>- ASSA ABLOY Website Privacy Notice</li> <li>- ASSA ABLOY Code of Conduct Privacy Notice</li> <li>- ASSA ABLOY Cookie Policy</li> </ul>		Y
<b>ASSA ABLOY DOCUMENTS AND RECORDS</b>			
Products and Solutions	<ul style="list-style-type: none"> <li>- Company Profile</li> <li>- Annual Price List</li> </ul>	Y	Y
Customer Documents	<ul style="list-style-type: none"> <li>- Terms and Conditions of Sale</li> <li>- ASSA ABLOY Code of Conduct (refer to ASSA ABLOY Group above)</li> </ul>	Y	Y

Warranties and Guarantees	<ul style="list-style-type: none"> <li>- Product Care and Maintenance Management</li> <li>- General Products Warranty Policy</li> <li>- UNION General Products Warranty Policy</li> <li>- UNION Lockset Warranty</li> <li>- Yale General Products Warranty Policy</li> <li>- Yale Lockset Warranty</li> <li>- Incedo Hardware Warranty Policy</li> <li>- IDS Warranty Policy</li> </ul>	Y	Y
Supplier Documents	<ul style="list-style-type: none"> <li>- ASSA ABLOY EMEA Terms and Conditions of Supply</li> <li>- ASSA ABLOY Code of Conduct (refer to ASSA ABLOY Group Above)</li> <li>- ASSA ABLOY Business Partner Code of Conduct (refer to ASSA ABLOY group above)</li> </ul>	Y	Y
Data Privacy Documents	<ul style="list-style-type: none"> <li>- PAIA Manual</li> <li>- Privacy Statement</li> <li>- Website Privacy Policy</li> <li>- Cookie Policy</li> <li>- Legal Notice</li> <li>- General Data Protection Regulation (GDPR)</li> <li>- IDS Combined Data Act Notice Onyx Alarm Hub &amp; Onyx Phone Application EMEA</li> </ul>	Y	Y
Commercial Contracts	<p>The following documents/ records may be requested by third parties in respect of any proposed or existing business relationship with ASSA ABLOY:</p> <ul style="list-style-type: none"> <li>- Organization Chart of ASSA ABLOY SA Companies</li> <li>- CIPC Certificate of Disclosure</li> <li>- CM1 Certificate of Incorporation</li> <li>- CM9 Certificate of Change of Name</li> <li>- COR39 Notice of Change of Company Directors</li> <li>- VAT Certificate</li> <li>- Tax Compliance Status (SARS)</li> <li>- Proof of Bank Details</li> <li>- Board resolution giving authorization to individuals authorized to sign on behalf of the legal entity</li> <li>- B-BBEE certificate (AASA &amp; FSK)</li> <li>- COIDA Letter of Good Standing</li> </ul>	N	Y

	<ul style="list-style-type: none"><li>- Relevant Insurance Certificates</li><li>- IDS ISO 9001 : 2015 certificate</li></ul> <p>Please note the following:</p> <p>(a) Any Personal Information Relating to Directors or Personnel of ASSA ABLOY is confidential and may be redacted on the documents/ records referred to above, prior to making these documents available; and</p> <p>(b) For information relating to the Beneficial Owners of ASSA ABLOY SA companies, please refer to information available on the ASSA ABLOY Group website and referred to above (Annual Report and List of Shareholders)</p>		
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\* Records which are not available on the company website, and which need to be requested, telephonically or via email will only be made available if requested for a legitimate purpose and remains subject to managements approval.

## **10. CATEGORIES OF RECORDS HELD BY ASSA ABLOY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION OR REGULATORY FRAMEWORKS (LIMITED DISCLOSURE IN TERMS OF REQUEST PROCEDURES)**

The below records held by ASSA ABLOY are available in accordance with the relevant legislation. Please refer to paragraph 13 (Request Procedure) on how to request access to these records.

Applicable Legislation	Records
Basic Conditions of Employment Act 75 of 1997	<ul style="list-style-type: none"><li>- Written particulars of employment</li><li>- Employment contracts and amendments</li><li>- Time and attendance records</li><li>- Overtime, nightwork, Sunday/ public holiday work records</li><li>- Leave records (annual, sick, family responsibility, parental-related)</li><li>- Termination records</li><li>- Deduction consents and proofs</li><li>- Remuneration records</li></ul>
Broad-Based Black Economic Empowerment Act 53 of 2003	<ul style="list-style-type: none"><li>- B-BBEE verification evidence files</li><li>- Ownership/ share registers and transaction documents</li><li>- Management control and employment equity data</li></ul>

	<ul style="list-style-type: none"> <li>- Skills development spend, learner agreements and completion records</li> <li>- Preferential procurement and supplier/ enterprise development contributions</li> <li>- Socio-economic development evidence</li> <li>- B-BBEE certificates and affidavits</li> <li>- Verification agency reports and working papers</li> </ul>
Companies Act 71 of 2008	<ul style="list-style-type: none"> <li>- Memorandum of Incorporation and alterations or amendments</li> <li>- Notice of Incorporation (registration certificate) and name change records</li> <li>- Register of directors, alternate directors, prescribed officers, auditors and company secretary</li> <li>- Notice and minutes of all shareholders meetings, including resolutions adopted and documents made available to the holders of securities</li> <li>- Written communications to shareholders</li> <li>- Annual Financial Statements</li> <li>- Accounting records</li> <li>- Minutes and resolutions of director's meetings and committee meetings</li> <li>- Records of director's disclosures of personal financial interests</li> <li>- Securities and Ultimate Beneficial Owner Register and filings to CIPC</li> </ul>
Consumer Protection Act (CPA) 68 of 2008	<ul style="list-style-type: none"> <li>- Records of marketing consents and opt-outs</li> <li>- Pricing, promotion and special offer records</li> <li>- Product information and labelling files</li> <li>- Warranties/ guarantees and repair/replace/refund records</li> <li>- Product recall documentation</li> <li>- Disclosures and quotations</li> </ul>
Compensation for Occupational Injuries and Diseases Act 130 of 1993	<ul style="list-style-type: none"> <li>- Records of earnings and other prescribed particulars of all employees</li> <li>- Incident/ accident records</li> <li>- Reportable accident submission and claim forms</li> <li>- Medical reports</li> <li>- Return of earning submissions</li> <li>- COID registration and assessment notices</li> </ul>
Customs and Excise Act 91 of 1964	<ul style="list-style-type: none"> <li>- Import/ export bills of entry and clearances</li> <li>- Commercial invoices and packing lists</li> <li>- Transport and shipping documents</li> <li>- Customs valuation workings</li> </ul>

	<ul style="list-style-type: none"> <li>- Tariff classification determinations</li> <li>- Rebate/ drawback claims</li> <li>- Warehousing and removal records</li> <li>- Excise accounts and stock records</li> <li>- Bonded goods registers</li> <li>- Deferment and payment records</li> </ul>
Employment Equity Act 55 of 1998	<ul style="list-style-type: none"> <li>- Employment Equity Plans</li> <li>- EEA2 and EEA4 submissions</li> <li>- Workforce profiles and analyses</li> <li>- Barrier analyses and affirmative action measures</li> <li>- Consultation records and committee meeting minutes</li> </ul>
Income Tax Act 58 of 1962	<ul style="list-style-type: none"> <li>- Income tax returns and assessments</li> <li>- Financial statements, trial balances and tax computations</li> <li>- Invoices, receipts and supporting schedules</li> <li>- Bank statements and cashbooks</li> <li>- Fixed asset registers and wear-and-tear schedules</li> <li>- Withholding tax records, returns and assessments</li> <li>- In respect of payroll taxes withheld from employees, the amount of remuneration paid to or due to an employee, the amount of employees' tax deducted or withheld, the income tax reference numbers of employees and any further prescribed information</li> <li>- Donations tax records, returns and assessments</li> <li>- IRP5/IT3 certificates</li> <li>- Supporting documents for allowances, deductions and incentives</li> <li>- Transfer pricing documentation</li> <li>- Section 18A donation certificates</li> </ul>
Labour Relations Act 66 of 1995	<ul style="list-style-type: none"> <li>- Records in compliance with any collective agreement, arbitration award or determinations made in terms of the Wage Act</li> <li>- Records for each employee specifying the nature of and disciplinary transgressions, the actions taken by the employer and the reason for the actions</li> <li>- Prescribed details of any strike, lockout or protest action involving employees</li> </ul>
National Credit Act 34 of 2005	<ul style="list-style-type: none"> <li>- Credit applications and affordability assessments</li> <li>- Pre-agreement disclosures and quotations</li> </ul>

	<ul style="list-style-type: none"> <li>- Signed credit agreements and amendments</li> <li>- Copy of rejection letter (if applicable) and reasons for declining an application for credit</li> <li>- Records of payments made</li> <li>- Credit bureau consents and adverse action notices</li> <li>- Marketing consent and opt-out records</li> <li>- Documentation in support of any steps taken after default by customer</li> <li>- Collections and legal process records</li> <li>- Dispute and complaint records</li> </ul>
Occupational Health and Safety Act 85 of 1993	<ul style="list-style-type: none"> <li>- OHS policy and statutory appointments</li> <li>- Records of committee recommendations made to an employer in terms of issues affecting the health of employees and any report made to an inspector as contemplated in section 20(2) of the Act</li> <li>- Risk assessments and safe work procedures</li> <li>- Training and induction records</li> <li>- Incident/accident and near-miss reports</li> <li>- Statutory inspection registers and certificates (e.g. lifting equipment, pressure vessels and electrical installations)</li> <li>- Medical surveillance and fitness-to-work records</li> <li>- PPE issue registers</li> <li>- Emergency plans</li> <li>- Contractor control records</li> <li>- Health and safety committee meeting minutes</li> <li>- Records of assessments and noise monitoring</li> </ul>
Protection of Personal Information Act 2 of 2000	<ul style="list-style-type: none"> <li>- Records of processing activities ("RoPA")</li> <li>- Lawful bases or consent records</li> <li>- Information Officer and Deputy Information Officer appointments</li> <li>- Operator agreements and due diligence files</li> <li>- Privacy notices and versions</li> <li>- Data subject request logs and responses</li> <li>- Security safeguards and access controls</li> <li>- Incident/ breach logs and notifications</li> <li>- Retention and destruction schedules</li> </ul>

	<ul style="list-style-type: none"> <li>- Cross border transfer assessments</li> </ul>
Promotion of Access to Information Act 2 of 2000	<ul style="list-style-type: none"> <li>- PAIA manual</li> <li>- Request registers and decision records</li> <li>- Fee records</li> <li>- Schedules of information held</li> <li>- Correspondence with the Information Regulator on PAIA matters</li> </ul>
Skills Development Act 97 of 1998	<ul style="list-style-type: none"> <li>- Learnership/ apprenticeship agreements and registers</li> <li>- Training, attendance and competency outcomes</li> <li>- Workplace training plans and logs</li> <li>- Mentorship records</li> <li>- Evidence files supporting discretionary/ mandatory grants via SETA's</li> </ul>
Skills Development Levies Act 9 of 1999	<ul style="list-style-type: none"> <li>- Payroll and remuneration records supporting SDL</li> <li>- Levy calculations</li> <li>- EMP submissions and payments</li> <li>- Workplace Skills Plans and Annual Training Reports</li> <li>- Grant applications and approvals</li> <li>- Correspondence with SARS and SETA's</li> </ul>
Tax Administration Act 28 of 2011	<ul style="list-style-type: none"> <li>- Tax returns and assessments</li> <li>- PAYE, VAT and withholding tax records</li> <li>- "Relevant material" supporting all tax positions</li> <li>- Records of objections or appeals</li> <li>- Reportable arrangement registers (if applicable)</li> </ul>
Unemployment Contributions Act 4 of 2002	<ul style="list-style-type: none"> <li>- UIF registration documents</li> <li>- Remuneration records</li> <li>- Contribution calculations and deductions</li> <li>- UIF declarations (uFiling or other)</li> <li>- EMP submissions and payments</li> <li>- Employee commencement/ termination details</li> </ul>
Unemployment Insurance Act 30 of 1966	<ul style="list-style-type: none"> <li>- Employee particulars, employment dates, remuneration and termination reasons</li> <li>- UI-19 and related declaration records</li> <li>- Supporting documents for employee claims and employer confirmations</li> </ul>

Value Added Tax Act 89 of 1991	<ul style="list-style-type: none"> <li>- VAT registration records</li> <li>- Tax invoices, debit and credit notes</li> <li>- VAT returns and workings</li> <li>- Input/output tax calculations</li> <li>- Apportionment and adjustment records</li> <li>- Export documentation and zero-rating evidence</li> <li>- Fixed assets and capital goods input VAT records</li> </ul>
Export Control and Sanctions Restrictions (records kept in terms of ASSA ABLOY Group Export Control and Sanctions Restrictions Policy)	<ul style="list-style-type: none"> <li>- Records of Customers, Vendors, Agents and Distributors, including information of top management, directors and shareholders up to and including ultimate beneficial owners</li> <li>- Records of down-stream customers and end-users</li> <li>- Privacy Notices for Export Control and Sanctions Screening signed by Customers, Vendors, Agents and Distributors or representatives thereof</li> <li>- Records of screening and screening outcomes on the abovementioned Data Subjects to ensure compliance with export control and sanctions restrictions (Google, CIPC, Dow Jones, etc.)</li> <li>- Records of intended destinations for goods or services to be sold or provided by ASSA ABLOY</li> <li>- Trade compliance risk assessments</li> <li>- Products and Services classification</li> </ul>

## **11. DESCRIPTION OF THE SUBJECTS ON WHICH ASSA ABLOY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT (LIMITED DISCLOSURE IN TERMS OF REQUEST PROCEDURE)**

The below table describes the subjects in respect of which ASSA ABLOY holds records and the categories of records held on each subject in addition to that which is legally required to be kept by ASSA ABLOY in terms of paragraph 10 above. Please refer to paragraph 13 (Request Procedure) on how to request access to these records.

Subjects on which ASSA ABLOY holds records	Categories of Records
<b>Communications</b>	<ul style="list-style-type: none"> <li>- Newsletters</li> <li>- Press releases</li> </ul>

	<ul style="list-style-type: none"> <li>- Product related information</li> <li>- Advertising and promotions</li> <li>- Other publications</li> </ul>
<b>Business and Operational Records</b>	<ul style="list-style-type: none"> <li>- Strategic plans, including business development and marketing</li> <li>- Operational or internal policies and procedures</li> <li>- Production, inventory and logistical records</li> <li>- Internal correspondence</li> <li>- Service records</li> </ul>
<b>Human Resources</b>	<ul style="list-style-type: none"> <li>- Human resources policies and procedures</li> <li>- ASSA ABLOY Code of Conduct</li> <li>- Signed employee privacy notices</li> <li>- Advertised positions</li> <li>- Employment contracts</li> <li>- Employee records</li> <li>- Training reports</li> <li>- Employment Equity reports</li> <li>- Grievance records</li> </ul>
<b>Legal services and compliance</b>	<ul style="list-style-type: none"> <li>- Compliance policies and guidelines</li> <li>- Intellectual property records</li> <li>- Risk registers</li> </ul>
<b>Financial Information</b>	<ul style="list-style-type: none"> <li>- Customer, supplier, agent and distributor information (including information required in terms of export control and sanctions screening requirements)</li> <li>- Customer and supplier lists</li> <li>- Audited Financial Statements</li> <li>- Accounting records</li> <li>- Tax records</li> <li>- Subcontractor records</li> <li>- Commercial agreements</li> <li>- Non-Disclosure agreements</li> </ul>
<b>Health, Safety and Environment</b>	<ul style="list-style-type: none"> <li>- Health and safety records</li> </ul>
<b>Facilities Management</b>	<ul style="list-style-type: none"> <li>- Physical security, electronic access and time and attendance</li> </ul>
<b>Data Protection</b>	<ul style="list-style-type: none"> <li>- Records of Processing Activities (RoPA's)</li> </ul>

	<ul style="list-style-type: none"><li>- Data Protection Impact Assessments (DPIA's)</li><li>- Legitimate Interest Assessments (LIA's)</li><li>- Transfer Impact Assessments (TIA's)</li><li>- Operator agreements</li><li>- Product Specific Privacy Notices (where applicable)</li><li>- Privacy Notice specific to Export Control and Sanctions Restrictions</li><li>- Training and awareness records</li></ul>
<b>Information Security and Technology</b>	<ul style="list-style-type: none"><li>- Access control logs</li><li>- Cybersecurity event logs</li><li>- Incident reports</li><li>- User access management records</li><li>- System architecture and network diagrams</li><li>- Vendor due diligence and security assessments</li><li>- Data Protection Impact Assessments (DPIA's)</li><li>- Encryption key management records</li></ul>

## 12. PROCESSING OF PERSONAL INFORMATION

### **Purpose for Processing Personal Information:**

In terms of POPIA, Personal Information may only be Processed for a specific purpose. The purpose for which Personal Information is Processed by ASSA ABLOY will depend on the nature of the Personal Information and the Data Subject to whom it relates. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the Personal Information is collected.

In general, Personal Information is Processed for the following purposes: products or service provision and support, product development and security, compliance with laws and regulations, customer relationship management, supplier and contractor relationship management, access control and site security, records management, monitoring and ensuring compliance with ASSA ABLOY Group policies and procedures, compliance with Export Control and Sanctions Restrictions, fraud prevention and incidence response, recruitment and employment administration, financial management, responding to and complying with requests received from Data Subjects and Regulators, and marketing communications in compliance with direct marketing requirements.

### **Justification for the Processing of Personal Information:**

Personal Information may only be Processed if there is consent or justification to do so. We generally rely on the following condition justifications: (i) Processing is necessary to carry out actions for the conclusion or performance of a contract to which the Data Subject is party (Sect. 11(1)(b) of POPIA), (ii) Processing complies with an obligation imposed by law on the responsible party (Sect. 11(1)(c) of POPIA) and/or (iii) Processing protects a legitimate interest of the data subject (Sect. 11(1)(d) of POPIA).

### **Description of the categories of Data Subjects and of the information or categories of information relating thereto:**

*This list of categories of Data Subjects and the information or categories of information related thereto is non-exhaustive.*

<b>Data Subjects</b>	<b>Personal Information</b>
Distributors, Customers, Down-Stream Customers and End-Users (including top management, directors and shareholders up to and including ultimate beneficial owners)	Name, address, registration numbers or identity numbers, registration date, date of birth, contact details, banking details, VAT numbers, credit status, financial information, biometric information, correspondence sent by the Data Subject that is implicitly or explicitly private, device identifiers, tax status information, IP addresses, cookie identifiers and telemetry data associated with digital products and services; CCTV footage and access control metadata; user account identifiers; voice recordings or other biometric data in order to perform services or

	<p>software services, and information to perform customer due diligence.</p> <p>Note that due diligence screening performed on Data Subjects could result in further processing of Personal Information such as information on sex, country of birth, country of citizenship, country of residence, marital status and spousal information, biometric data such as facial recognition, information on criminal convictions, trade or sanctions restrictions, financial crimes or sanctions, adverse media, political affiliation and any other government issued list relating to crimes committed.</p>
Agents, Suppliers and Service Providers (including top management, directors and shareholders up to and including ultimate beneficial owners)	<p>Name, address, registration numbers or identity numbers, registration date, date of birth, contact details, banking details, VAT numbers, tax status information, B-BBEE status information, financial information, information on quality control systems, information on health and safety policies and procedures, confidential information relating to products and/or services, correspondence sent by the Data Subject that is implicitly or explicitly private; trade secrets, CCTV footage and access control metadata and information to perform supplier or contractor due diligence.</p> <p>Note that due diligence screening performed on Data Subjects could result in further processing of Personal Information such as information on sex, country of birth, country of citizenship, country of residence, marital status and spousal information, biometric data such as facial recognition, information on criminal convictions, trade or sanctions restrictions, financial crimes or sanctions, adverse media, political affiliation and any other government issued list relating to crimes committed.</p>
Personnel	<p>Name, addresses, company code, title, contact details, User ID's, Personal ID's, email addresses, citizenship, passport data, nationality, gender, race or ethnicity, date of birth, country of birth, ID number, tax status information, tax number, next of kin and emergency contact details, recruitment information, bank account details,</p>

	information on prior employers, marital status and spousal information, information on dependents, licence plate, driver's licence, professional membership, payroll records, insurance, medical aid or provident or pension fund benefits, information relating to attachments of salary or garnishee orders, CCTV footage and access control metadata including biometric data, health and fitness-for-work information, trade union affiliation and information about criminal convictions and offences.
Third Parties not referred to above (including, where relevant, top management, directors and shareholders up to and including ultimate beneficial owners)	<p>Name, address, registration numbers or identity numbers, registration date, date of birth, contact details, banking details, VAT numbers, tax status information, B-BBEE status information, financial information, correspondence sent by the Data Subject that is implicitly or explicitly private; trade secrets, CCTV footage and access control metadata and information to perform third party due diligence.</p> <p>Note that due diligence screening performed on Data Subjects could result in further processing of Personal Information such as information on sex, country of birth, country of citizenship, country of residence, marital status and spousal information, biometric data such as facial recognition, information on criminal convictions, trade or sanctions restrictions, financial crimes or sanctions, adverse media, political affiliation and any other government issued list relating to crimes committed.</p>

**Recipients or categories of recipients to whom the Personal Information may be supplied:**

Depending on the nature of the Personal Information, ASSA ABLOY may supply information or records to the following categories of recipients:

*The below list of categories of recipients and legal justification for transfers is not exhaustive.*

Categories of Recipients	Description
Other Companies within the ASSA ABLOY Group	ASSA ABLOY may transfer Personal Information collected to other entities within the ASSA ABLOY Group to comply with legal, auditing,

	operational or recordkeeping requirements to which ASSA ABLOY is subject.
Third Party Service Providers and Suppliers	ASSA ABLOY contracts with third party service providers or other ASSA ABLOY Group companies as part of its normal business operations to carry out certain IT related tasks or assist in providing services or software services to ASSA ABLOY and/ or to Customers, Down Stream Customers or End-Users.
Governmental Agents and Regulators, insurance carriers, courts and governmental authorities, including SARS	ASSA ABLOY may transfer Personal Information collected where there is a legal obligation to do so or where it is required to protect the Legitimate Interests of ASSA ABLOY in terms of any dispute, arbitral proceedings or legal action to which ASSA ABLOY may become party.
Credit Bureau or Credit Providers Industry Association	ASSA ABLOY may share information about a client's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which ASSA ABLOY operates as may be required in terms of industry standards and best practice.
Other	ASSA ABLOY may transfer Personal Information collected to any person making a successful application for access to relevant information in terms of PAIA or POPIA.

**Planned transborder flows of Personal Information:**

Transborder transfers are only permitted where: (i) the recipient is subject to a law, binding corporate rules or a binding agreement providing an adequate level of protection; (ii) the Data Subject has consented to the transfer; (iii) the transfer is necessary to perform a contract or is in the legitimate interest of the Data Subject; or (v) the Information Regulator has permitted the transfer.

ASSA ABLOY may transfer Personal Information to other entities within the ASSA ABLOY Group or to Service Providers or Suppliers as set out in the table above (Recipients or categories of recipients to whom the Personal Information may be supplied).

Some recipients may be located in countries that may not have data protection laws which are similar to those of South Africa. Where the ASSA ABLOY Group transfers Personal Information to these recipients, it will ensure that it has entered into appropriate data transfer agreements and that appropriate technical and organization security measures are in place to protect the Personal Information against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of Processing.

**General description of Information Security Measures implemented by ASSA ABLOY to ensure the confidentiality, integrity and availability of the information:**

ASSA ABLOY has put in place appropriate technical, physical and administrative security measures to protect the Personal Information it processes against loss, misuse, unauthorized access, disclosure, or alteration. Some of the safeguards used includes firewalls, data encryption, document sensitivity labelling and access and authorization controls. In addition, ASSA ABLOY limits access to Personal Information to those employees, agents, contractors or third parties who have a business need to Process the information. They will only Process Personal Information on our instructions and are subject to a duty of confidentiality.

**13. REQUEST PROCEDURE****Completion of the prescribed form**

Any request for access to a record held by a Private Body in terms of PAIA must substantially correspond with the form included in Appendix B hereto. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.

Grounds for refusal of the request for access to a record or information held by the Private Body are set out in PAIA and are discussed below.

POPIA provides that a Data Subject may, upon proof of identity, request ASSA ABLOY to confirm, free of charge, all the information it holds about the Data Subject and may request access to such information, including information about the identity of third parties who have or have had access to such information. A Data Subject who wishes to determine whether ASSA ABLOY holds any information about the Data Subject, or who wishes to gain access to such information, including information about the identity of third parties who have or have had access to such information, may send a simple request to the relevant Information Officer using the details as set out in paragraph 6 (Contact Details).

POPIA also provides that a Data Subject may object, at any time, to the Processing of Personal Information by ASSA ABLOY, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. Direct marketing opt-outs and objections must be processed using Form 1 (Appendix D) or any clear, valid opt-out mechanism provided in any communication issued by ASSA ABLOY.

A Data Subject may also request ASSA ABLOY to correct or delete Personal Information about the Data Subject, in its possession or under its control, that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or destroy or delete a record of Personal Information about the Data Subject that ASSA ABLOY is no longer authorised to retain in terms of POPIA's retention and restriction of records provisions. Where a Data Subject wishes to request a correction or deletion of Personal Information or the destruction or deletion of a record of Personal Information a request must be made using Form 2 (Appendix E).

## **Proof of identity**

Proof of identity is required to authenticate your identity and the request. You will, in addition to the prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity. Where requests are made on behalf of another person or juristic person, a valid mandate or proof of authority is required.

## **Payment of the prescribed fees**

Section 54 of PAIA entitles ASSA ABLOY to levy a charge or to request a fee to enable it to recover the cost of processing a request and/or providing access to records. The fees that may be charged are set out in Appendix C of this Manual and are in accordance with Regulation 8 and Item 9 of Annexure B to the Regulations promulgated under PAIA.

Personal requesters seeking their own Personal Information under PAIA/POPIA will generally not be charged a request fee, although reasonable reproduction fees may apply.

Where a decision to grant a request for access has been taken, the record or information will not be disclosed until the necessary fees have been paid in full.

## **Timelines for consideration of a request for access**

Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed. Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

Complex Data Subject requests under POPIA, including where ASSA ABLOY is required to obtain consent from a third-party Data Subject to whom the requested information relates, may require up to 60 (sixty) days extension where permitted, with interim notifications provided.

## **Protection of confidential information**

Notwithstanding the below Grounds for Refusal and the Information Officer's right to refuse a request for access to a record or information, the Information Officer may require the requester to enter into a Non-Disclosure Agreement with ASSA ABLOY where the information or records requested is considered to, or may include sensitive or confidential information.

## **Grounds for refusal of access and protection of information**

In terms of section 70 of PAIA, the disclosure of a record is compulsory if it would reveal:

- a substantial contravention of, or failure to comply with the law; or
- there is an imminent and serious public safety or environmental risk; and
- the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

Subject therefore to the requirements of section 70 as referred to above, there are various grounds upon which a request for access to a record may be refused. These grounds include, without limitation:

- the protection of Personal Information of a third person (who is a natural person) from unreasonable disclosure;
- the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- if disclosure would result in the breach of a duty of confidence owed to a third party;
- if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- if the record was produced during legal proceedings, unless that legal privilege has been waived;
- if the record contains trade secrets, financial or sensitive information or any information that would put ASSA ABLOY at a disadvantage in negotiations or prejudice it in commercial competition;
- if the record contains information about research being carried out or about to be carried out on behalf of a third party or by ASSA ABLOY; and/or
- if the record would disclose ASSA ABLOY's cybersecurity defences or create a security risk.

If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the record requested.

## **14. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS**

If the Information Officer decides to grant access to a particular record in terms of PAIA and this Manual, such access must be granted within 30 (thirty) days of being informed of the decision.

There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. In the event that you are not satisfied with the outcome of the request submitted in accordance with PAIA and this Manual, you are entitled to apply to the Information Regulator or a court of competent jurisdiction to take the matter further whereafter the Information Regulator may conduct an investigation and issue an enforcement notice.

Where a third party is affected by the request and access is granted, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged, the request for access must be granted.

**15. AVAILABILITY OF THIS MANUAL**

Copies of this Manual are available for inspection, free of charge, at the offices of ASSA ABLOY and online via our websites. A copy is also available on request from the Information Officer in accessible formats where reasonably practicable.

**16. UPDATING OF THE MANUAL**

ASSA ABLOY may update this Manual from time to time and in accordance with any material changes in PAIA or POPIA, guidance issued by the Information Regulator, or a change in processing activities.

**FORM 1****REQUEST FOR A COPY OF THE GUIDE**

[Regulations 3]

**TO:** The Information Officer

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I,

Full names:				
In my capacity as (mark with "x"):	Information officer		Other	
Name of *public/private body ( <i>if applicable</i> )				
Postal Address:				
Street Address:				
E-mail Address:				
Facsimile:				
Contact numbers:	Tel.(B):		Cellular:	

Hereby request the following copy (ies) of the Guide:

Language ( <i>mark with "X"</i> )	No of copies	Language( <i>mark with "X"</i> )	No of copies
Sepedi		Sesotho	
Setswana		siSwati	
Tshivenda		Xitsonga	
Afrikaans		English	
isiNdebele		isiXhosa	
isiZulu			

Manner of collection (*mark with "x"*):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of requester

**FORM 2****REQUEST FOR ACCESS TO RECORD**  
[Regulation 7]**NOTE:**

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

**TO:** The Information Officer

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(Address)

E-mail address:

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Fax number:

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*Mark with an "X"*

Request is made in my own name

Request is made on behalf of another person.

**PERSONAL INFORMATION**

Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

#### **PARTICULARS OF RECORD REQUESTED**

*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 on a separate page and attach it to this form. All additional pages must be signed.)*

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

#### **TYPE OF RECORD** *(Mark the applicable box with an "X")*

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

**FORM OF ACCESS**  
(Mark the applicable box with an "X")

Printed copy of record ( <i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i> )	
Written or printed transcription of virtual images ( <i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i> )	
Transcription of soundtrack ( <i>written or printed document</i> )	
Copy of record on flash drive ( <i>including virtual images and soundtracks</i> )	
Copy of record on compact disc drive( <i>including virtual images and soundtracks</i> )	
Copy of record saved on cloud storage server	

**MANNER OF ACCESS**  
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body ( <i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i> )	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format ( <i>including transcriptions</i> )	
E-mail of information ( <i>including soundtracks if possible</i> )	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

**PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**

*If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*

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:	

<b>FEES</b>	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

<b>Postal address</b>	<b>Facsimile</b>	<b>Electronic communication (Please specify)</b>

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

***Signature of Requester / person on whose behalf request is made***

**FOR OFFICIAL USE**

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

***Signature of Information Officer***

### **FEES IN RESPECT OF PRIVATE BODIES**

The “request fee”, “fees for reproduction” and “access fees” payable by a requester, other than a personal requester and unless exempted under section 54(8) of PAIA are as follows (Item 9 of Annexure B of the PAIA Regulations):

<b>ITEM</b>	<b>DESCRIPTION</b>	<b>AMOUNT</b>
1.	The request fee payable by every requester	R140.00
2.	Photocopy/ printed black & white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on:	
	(i) Flash drive (to be provided by requestor)	R40.00
	(ii) Compact disc	
	• If provided by requestor	R40.00
	• If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	(iii) Flash drive (to be provided by requestor)	R40.00
	(iv) Compact disc	
	• If provided by requestor	R40.00
	• If provided to the requestor	R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00
	To not exceed a total cost of	R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

#### Exemptions from paying “access fees”

Person or persons exempted from paying access fees: -

- a) A single person whose annual income does not exceed R14,712; or
- b) Married persons or a person and his/her life partner whose annual income does not exceed R27,192

## FORM 1

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL  
INFORMATION, 2017**  
[Regulation 2(1)]

*Note:*

1. *Affidavits or other documentary evidence in support of the objection must 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.*

Reference Number....

A	DETAILS OF DATA SUBJECT
Name and surname of data subject:	
Residential, postal or business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party ( <i>if the responsible party is a natural</i> ):	
Residential, postal or business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	

Name of public or private body ( <i>if the responsible party is not a natural person</i> ):	
Business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	
<b>C</b>	<b>REASONS FOR OBJECTION</b> ( <i>Please provide detailed reasons for the objection</i> )

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

.....  
*Signature of data subject (applicant)*

## FORM 2

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017**  
[Regulation 3(2)]

**Note:**

1. *Affidavits or other documentary evidence in support of the request must 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.*

Reference Number....

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.

<b>A</b> DETAILS OF THE DATA SUBJECT	
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
Code ( )	
Contact number(s):	
Fax number:	
E-mail address:	
<b>B</b> DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party ( <i>if the responsible party is a natural person</i> ):	
Residential, postal or business address:	
Code ( )	
Contact number(s):	
Fax number:	
E-mail address:	

Name of public or private body ( <i>if the responsible party is not a natural person</i> ):		
Business address:		
		Code ( )
Contact number(s):		
Fax number:		
E-mail address:		
C	<b>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY. (Please provide detailed reasons for the request)</b>	

\* *Delete whichever is not applicable*

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

.....  
*Signature of Data subject*