

# **P and L Hardware (Pty) Ltd**

## **PAIA MANUAL**

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

**DATE OF COMPILATION: 02-04-2025  
DATE OF REVISION: 23-06-2026**

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- |                                    |   |
|------------------------------------|---|
| 1.1. <b>“Cashbuild Group”</b>      | All entities within Cashbuild Group, including P and L Hardware (Pty) Ltd   |
| 1.2. <b>“CEO”</b>                  | Chief Executive Officer   |
| 1.3. <b>“Data Subject(s)”</b>      | the natural or juristic person/s to whom Personal Information relates;  |
| 1.4. <b>“DIO”</b>                  | Deputy Information Officer;   |
| 1.5. <b>“IO”</b>                   | Group Information Officer;  |
| 1.6. <b>“Minister”</b>             | Minister of Justice and Correctional Services;  |
| 1.7. <b>“PAIA”</b>                 | Promotion of Access to Information Act No. 2 of 2000 (as amended);  |
| 1.8. <b>“PAIA Manual/Manual”</b>   | This manual published in compliance with section 51 of PAIA, together with all annexures thereto;   |
| 1.9. <b>“Personal Information”</b> | has the meaning ascribed thereto under POPIA;   |
| 1.10. <b>“Personnel”</b>           | any person who works for or provides services to or on behalf of Cashbuild Group and receives or is entitled to receive any remuneration. This includes, without limitation, directors (both executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;  |
| 1.11. <b>“POPIA”</b>               | Protection of Personal Information Act No.4 of 2013 (as amended);   |
| 1.12. <b>“Processing”</b>          | any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including: the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form; and merging, linking, as well as blocking, degradation, erasure or destruction of information; |
| 1.13. <b>“Record”</b>              | any recorded information, regardless of form or medium, which is in the possession or under the control of Cashbuild Group, irrespective of whether it was created by Cashbuild Group;  |
| 1.14. <b>“Regulator”</b>           | Information Regulator;  |
| 1.15. <b>“Republic”</b>            | Republic of South Africa;   |
| 1.16. <b>“Request”</b>             | a request for access to a Record of Cashbuild Group;  |
| 1.17. <b>“Requester”</b>           | any person, including a public body or an official thereof, making a Request for access to a Record of Cashbuild Group and includes any person acting on behalf of that person; and   |
| 1.18. <b>“Third Party”</b>         | any independent contractor, agent, consultant, sub-contractor or other representative of Cashbuild Group.   |

## 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2. have sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records, and the categories of records held on each subject;

- 2.3. know the description of the records of the body which are available in accordance with any other legislation;
- 2.4. access all the relevant contact details of the Information Officer and Deputy Information Officers who will assist the public with the records they intend to access;
- 2.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6. know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9. know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### **3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION**

#### **3.1. Information Officer for Cashbuild Group**

Name: Takie Nengovhela  
 Tel: 011 248 1696  
 Email: [tnengovhela@Cashbuild.co.za](mailto:tnengovhela@Cashbuild.co.za)

#### **3.2. Deputy Information Officer**

Name: Jacques van Deventer  
 Tel: 011 248 1500  
 Email: [jvdeventer@Cashbuild.co.za](mailto:jvdeventer@Cashbuild.co.za)

#### **3.3 Access to information general contacts**

Email: [tnengovhela@Cashbuild.co.za](mailto:tnengovhela@Cashbuild.co.za)

#### **3.4 Cashbuild Group Head Office**

Name of the Private Body: P and L Hardware (Pty) Ltd (Reg No: 2005/034591/07)  
 CEO of the Private Body: Werner De Jager  
 Postal Address: PO Box 90115, Bertsham, 2013  
 Physical Address: 2 Handel Road, Ormonde, Johannesburg, 2091  
 Telephone: 011 248 1500 / 010 448 7265  
 Website: [www.cashbuild.co.za](http://www.cashbuild.co.za)

#### 4. HOW TO ACCESS THE GUIDE IN TERMS OF SECTION 10 OF THE ACT

- 4.1. The 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.
- 4.2. The Guide is available in each of the official languages.
- 4.3. The aforesaid Guide contains the description of-
  - 4.3.1. the objects of PAIA and POPIA;
  - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
    - 4.3.2.1. the Information Officer of every public body, and
    - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 4.3.3. the manner and form of a request for-
    - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
    - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
  - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
  - 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
  - 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
    - 4.3.6.1. an internal appeal;
    - 4.3.6.2. a complaint to the Regulator; and
    - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
  - 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
  - 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

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<sup>1</sup> Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>2</sup> Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

<sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

- 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.4. the regulations made in terms of section 92<sup>11</sup>.
- 4.5. The Guide is accessible on the Information Regulator's website, as well as from the offices of the Information Regulator during normal working hours, or you may request a copy of the Guide from Cashbuild Group by contacting our Group Information Officer. You may also direct any queries to:
  - 4.5.1. The Information Regulator of South Africa
    - 4.5.1.1. Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
    - 4.5.1.2. Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017
    - 4.5.1.3. E-mail: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)
    - 4.5.1.4. Website: <https://infoeregulator.org.za/>

## **5. CATEGORIES OF RECORDS HELD BY CASHBUILD GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

- 5.1. Records of a public nature, typically those disclosed on the Cashbuild Group's website and in its various annual reports, may be accessed without the need to submit a formal application.
- 5.2. 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 need to be made timeously with the Information Officer.
- 5.3. The following categories of records are automatically available for inspection, or photocopying from our website-
  - 5.3.1. Leaflets
  - 5.3.2. Press releases
  - 5.3.3. Publications; and
  - 5.3.4. Various other marketing and promotional materials.

## **6. DESCRIPTION OF THE RECORDS BY CASHBUILD GROUP WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

- 6.1. Where applicable to its operations, Cashbuild Group also retains records and documents in terms of but not limited to the legislation listed below. 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 PAIA; 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 PAIA.

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<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Any notice required by this Act;

- a) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- b) any administrative or procedural matter necessary to give effect to the provisions of this Act."

<b>Applicable Legislation</b>
Basic Conditions of Employment Act 75 of 1997
Broad-Based Black Economic Empowerment Act 53 of 2003
Companies Act 71 of 2008
Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
Competition Act 89 of 1998
Consumer Protection Act 68 of 2008
Copyright Act 98 of 1978
Customs and Excise Act 91 of 1964
Customs Duty Act 30 of 2014
Debt Collectors Act 114 of 1998
Electronic Communications and Transactions Act 25 of 2002
Electronic Communications Act, 36 of 2005
Employment Equity Act 55 of 1998
Financial Intelligence Centre Act 38 of 2001
Income Tax Act 58 of 1962
Insolvency Act No. 24 of 1936
Labour Relations Act 66 of 1995
National Credit Act 34 of 2005
Occupational Health & Safety Act 85 of 1993
Pension Funds Act 24 of 1956
Prevention of Organised Crime Act 121 of 1998
Prevention and Combating of Corrupt Activities Act 12 of 2004
Protection of Personal Information Act 4 of 2013
Promotion of Access to Information Act 2 of 2000
Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
Protected Disclosures Act 26 of 2000
Skills Development Act 97 of 1998
Skills Development Levies Act 9 of 1999
Stock Exchanges Control Act 1 of 1985 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)
Unemployment Contributions Act 4 of 2002
Unemployment Insurance Act 30 of 1966
Value Added Tax Act 89 of 1991
Such other legislation as may from time to time be applicable

## **7. CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CASHBUILD GROUP AVAILABLE ONLY ON REQUEST FOR ACCESS**

Cashbuild Group maintains records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

Please note further that many of the records held by Cashbuild Group are those of third parties, such as clients and employees, and Cashbuild Group takes the protection of third-party confidential information very seriously.

Subjects on which the body holds records	Categories of records
<p>Personnel Records</p> <p>“<b>Personnel</b>” refers to any person who works for or provides services to or on behalf of Cashbuild Group and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Cashbuild Group. This includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers.</p>	<ul style="list-style-type: none"> <li>• Personal records provided by personnel.</li> <li>• Records provided by a third party relating to personnel.</li> <li>• Conditions of employment and other personnel-related contractual and quasi-legal records.</li> <li>• Internal evaluation records and other internal records</li> <li>• Correspondence relating to personnel.</li> <li>• Training schedules and material.</li> </ul>
<p>Customer Related Records</p> <p>A “<b>customer</b>” refers to any natural or juristic entity that purchases products or receives services from Cashbuild Group.</p>	<ul style="list-style-type: none"> <li>• Records provided by a customer to a third party acting for or on behalf of Cashbuild Group.</li> <li>• Records provided by a third party.</li> <li>• Records generated by or within Cashbuild Group relating to its customers, including transactional records.</li> </ul>
<p>Private Body Records</p>	<ul style="list-style-type: none"> <li>• Financial Records</li> <li>• Operational Records</li> <li>• Databases</li> <li>• Information Technology</li> <li>• Marketing Records</li> </ul>
<p>Internal Correspondence</p>	<ul style="list-style-type: none"> <li>• Product Records</li> <li>• Statutory Records</li> <li>• Internal Policies and Procedures</li> <li>• Records held by officials of the institution</li> </ul> <p>These records include, but are not limited to, the records which pertain to Cashbuild Group’s own affairs.</p>
<p>Other Third-Party Records</p>	<ul style="list-style-type: none"> <li>• Personnel, customer or private body records which are held by another party, as opposed to the records held by Cashbuild Group itself.</li> <li>• Records held by Cashbuild Group pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.</li> <li>• Cashbuild Group may possess records pertaining to other parties, including without limitation contractors, suppliers, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to Cashbuild Group.</li> </ul>

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

## 8. REQUEST PROCEDURE

### 8.1. Completion of the prescribed form

- 8.1.1. Any request for access to a record in terms of PAIA must be completed on Form 2 attached hereto and should be specific in terms of the record requested.
- 8.1.2. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you, the requestor.
- 8.1.3. POPIA provides that a data subject may, upon proof of identity, request Cashbuild Group 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.
- 8.1.4. POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, Cashbuild Group must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.
- 8.1.5. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
- 8.1.6. POPIA provides that a data subject may object, at any time, to the processing of personal information by Cashbuild Group, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as POPIA Form 1 and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.
- 8.1.7. A data subject may also request Cashbuild Group 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 Cashbuild Group is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- 8.1.8. A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above on the form attached hereto as POPIA Form 2.

### 8.2. Proof of identity

- 8.2.1. Proof of identity is required to authenticate your identity and the request. You will, in addition to this 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.

### 8.3. Payment of the prescribed fees

- 8.3.1. This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in **Annexure B**.
- 8.3.2. Section 54 of PAIA entitles Cashbuild Group to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records.
- 8.3.3. When a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

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

- 8.4.1. 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.
- 8.4.2. The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations.
- 8.4.3. Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

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

- 8.5.1. There are various grounds upon which a request for access to a record may be refused. These grounds include:
  - 8.5.1.1. the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
  - 8.5.1.2. 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);
  - 8.5.1.3. if disclosure would result in the breach of a duty of confidence owed to a third party;
  - 8.5.1.4. if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
  - 8.5.1.5. if the record was produced during legal proceedings, unless that legal privilege has been waived;
  - 8.5.1.6. if the record contains trade secrets, financial or sensitive information or any information that would put Cashbuild Group (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
  - 8.5.1.7. if the record contains information about research being carried out or about to be carried out on behalf of a third party or by Cashbuild Group.
- 8.5.2. Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.
- 8.5.3. 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.

### **9. PROCESSING OF PERSONAL INFORMATION**

#### **9.1. Purpose of Processing Personal Information**

##### **9.1.1. Consumers**

- 9.1.1.1. Performing duties in terms of any agreement with consumers.
- 9.1.1.2. Make, or assist in making, credit decisions about consumers.
- 9.1.1.3. Operate and manage consumers' accounts and manage any application, agreement or correspondence consumers may have with Cashbuild Group.
- 9.1.1.4. Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about Cashbuild Group's products and services, unless consumers indicate otherwise.
- 9.1.1.5. To form a view of consumers as individuals and to identify, develop or improve products, that may be of interest to consumers.
- 9.1.1.6. Carrying out market research, business and statistical analysis.
- 9.1.1.7. Performing other administrative and operational purposes including the testing of systems.

- 9.1.1.8. Recovering any debt that consumers may owe the Cashbuild Group.
- 9.1.1.9. Complying with the Cashbuild Group's regulatory and other obligations.
- 9.1.1.10. Any other reasonably required purpose relating to the Cashbuild Group business.

**9.1.2. Prospective Consumers**

- 9.1.2.1. Verifying and updating information.
- 9.1.2.2. Pre-scoring.
- 9.1.2.3. Direct marketing.
- 9.1.2.4. Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Cashbuild Group's business.

**9.1.3. Employees**

- 9.1.3.1. The same purpose as for consumers (above).
- 9.1.3.2. Verification of applicant employees' information during recruitment process.

**9.1.4. General Matters Relating to Employees**

- 9.1.4.1. Pension;
- 9.1.4.2. Medical aid;
- 9.1.4.3. Payroll;
- 9.1.4.4. Disciplinary action;
- 9.1.4.5. Training; and
- 9.1.4.6. Any other reasonably required purpose relating to the employment or possible employment relationship.

**9.1.5. Vendors / suppliers / other businesses**

- 9.1.5.1. Verifying information and performing checks;
- 9.1.5.2. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- 9.1.5.3. Payment of invoices;
- 9.1.5.4. Complying with the Cashbuild Group's regulatory and other obligations; and
- 9.1.5.5. Any other reasonably required purpose relating to the Cashbuild Group's business.

**9.2. DESCRIPTION OF THE CATEGORIES OF DATA SUBJECTS AND OF THE INFORMATION OR CATEGORIES OF INFORMATION RELATING THERETO**

Categories of Data Subjects	Personal Information that may be processed
Consumers / Clients	<ul style="list-style-type: none"> <li>• Postal and/or street address</li> <li>• Title and name</li> <li>• Contact numbers and/or e-mail address</li> <li>• Ethnic group</li> <li>• Employment details</li> <li>• Age</li> <li>• Gender</li> <li>• Marital status</li> <li>• Nationality</li> <li>• Language</li> <li>• Financial information</li> <li>• Identity or passport number</li> <li>• Browsing habits and click patterns on Cashbuild</li> </ul>

	Group websites.
Vendors / suppliers / other businesses	<ul style="list-style-type: none"> <li>• Company name and contact details</li> <li>• Registration number and VAT details</li> <li>• Beneficial owner and directors' information</li> <li>• Banking and financial information</li> <li>• Information about products or services</li> <li>• Other information not specified, reasonably required to be processed for business operations.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• Name and contact details</li> <li>• Identity number and identity documents including passports</li> <li>• Employment history and references</li> <li>• Employee number</li> <li>• Banking and financial details</li> <li>• Details of payments to third parties (deductions from salary)</li> <li>• Employment contracts</li> <li>• Employment equity plans</li> <li>• Medical aid records</li> <li>• Pension fund records</li> <li>• Remuneration/salary records</li> <li>• Performance appraisals</li> <li>• Disciplinary records</li> <li>• Leave records</li> <li>• Training records</li> <li>• Qualifications</li> <li>• Biometrics</li> <li>• Medical records</li> <li>• Marital status</li> <li>• Disability status</li> <li>• Criminal records</li> </ul>

### 9.3. CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED

- 9.3.1. Depending on the nature of the Personal Information, Cashbuild Group may supply information or records to the following categories of recipients:
- 9.3.1.1. statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data;
  - 9.3.1.2. any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules;
  - 9.3.1.3. South African Revenue Services, or other similar authority;
  - 9.3.1.4. anyone making a successful application for access in terms of PAIA or POPIA; and
  - 9.3.1.5. subject to the provisions of POPIA and other relevant legislation, Cashbuild Group may share information about a data subject's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which Cashbuild Group operates.

#### **9.4. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION**

- 9.4.1. Cashbuild Group will not transfer personal information about their data subjects to a third party in a foreign country unless:
- 9.4.1.1. the third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection that—
    - 9.4.1.1.1. effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person; and
    - 9.4.1.1.2. includes provisions, that are substantially similar to this section, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country;
  - 9.4.1.2. the data subject consents to the transfer;
  - 9.4.1.3. the transfer is necessary for the performance of a contract between the data subject and Cashbuild Group, or for the implementation of pre-contractual measures taken in response to the data subject's request;
  - 9.4.1.4. the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between Cashbuild Group and a third party; or
  - 9.4.1.5. the transfer is for the benefit of the data subject, and—
    - 9.4.1.5.1. it is not reasonably practicable to obtain the consent of the data subject to that transfer; and
    - 9.4.1.5.2. if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.
  - 9.4.1.6. Children's information may not be transferred trans-border without the written consent of the parent or guardian.
  - 9.4.1.7. As Cashbuild Group's back-office processing is conducted in South Africa, all forms' consent notices include this statement of further processing of data subject's personal information in South Africa.
  - 9.4.1.8. Users are required to consult with the Information Officer should any trans-border flows of information be amended.

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

The decision of the Information Officer or deputy Information Officer is final. A requester aggrieved by a decision of the Information Officer to refuse a request for access may, within 180 days of the Information Officer's decision, submit a complaint to the Information Regulator in the prescribed manner and form (see section 77A of PAIA).

Alternatively, a requester is entitled to apply to a court of competent jurisdiction for appropriate relief (see section 78 of PAIA).

#### **11. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY THE RESPONSIBLE PARTY TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF THE INFORMATION**

The security and confidentiality of personal information is important to Cashbuild Group. We have implemented reasonable technical, administrative, and physical security measures to protect personal information from unauthorised access or disclosure and improper use. We are committed to ensuring that our security measures which protect your personal information are continuously reviewed and updated where necessary. In processing any personal information, Cashbuild Group shall comply with the following minimum technical and organisational security requirements:

- **Physical Access** – Access to personal information is restricted in our offices, and

only accessible to those personnel who need the personal information to perform a specific job / task.

- **Personnel Training** – All personnel with access to personal information are kept up to date on our security and privacy practices. After a new policy is added, these personnel are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for the personal information of all data subjects.
- **Unique User Identification** – Personnel each have a unique user ID assigned to them, subject to strict confidentiality undertakings in terms of Cashbuild Group's password, access control and confidentiality policies.
- **Passwords** – Cashbuild Group ensures that there are passwords required for any access to personal information in line with its policy.
- **Physical access and privileges** – Cashbuild Group ensures that access to personal information is limited to personnel on a "need to know" basis, and Personnel are required to strictly utilise their unique user ID and applicable passwords to access same.
- **Systems Review** – Cashbuild Group conducts regular reviews of its technical and organisational security measure system to ensure that all the above security measures are functioning effectively and applied consistently.

## 12. INFORMATION OR RECORDS NOT FOUND

If all reasonable steps have been taken to find a Record, and such a Record cannot be found or if the Records do not exist, then Cashbuild Group will notify the Requester, by way of a formal letter, that it is not possible to give access to the requested Record.

The formal letter will provide a full account of all the steps taken to find the Record or to determine the existence thereof, including details of all communications by Cashbuild Group with every person who conducted the search. If the Record in question should later be found, the Requester shall be given access to the Record in the manner stipulated by the Requester unless access is refused by Cashbuild Group as permitted by PAIA.

## 13. INFORMATION REQUESTED ABOUT A THIRD PARTY

Where any information is requested from Cashbuild Group that relates to a third party, Cashbuild Group is required to notify the third party of the Request. The third party has an opportunity to grant his, her or its consent to the disclosure of the Record or to make representations as to why the requested Record should not be disclosed to the Requester. If Cashbuild Group decides to grant access to the Record, it will notify the affected third party again. The third party is entitled to apply to court in relation to that decision. The court will then determine whether the Record should be disclosed by Cashbuild Group or not.

## 14. AVAILABILITY OF THE MANUAL

14.1. A copy of the Manual is available-

14.1.1. on [www.cashbuild.co.za](http://www.cashbuild.co.za);

14.1.2. head office of Cashbuild Group for public inspection during normal business hours;

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

14.1.4. to the Information Regulator upon request.

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

**15. OTHER INFORMATION AS PRESCRIBED**

The Minister has not prescribed that any further information must be contained in this Manual.

**16. UPDATING OF THE MANUAL**

The Information Officer will, on a regular basis, update this manual.

## 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

[Redacted Address]

(Address)

E-mail [Redacted]

address:

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 <i>(when made on behalf of another person)</i>	
Postal Address	
Street Address	
E-mail Address	
Contact Numbers	Tel. (B):
	Cellular:
Full names of person on whose behalf request is made <i>(if applicable):</i>	
Identity Number	
Postal Address	

Street Address		
E-mail Address		
Contact Numbers	Tel. (B)	
	Cellular	
<b>PARTICULARS OF RECORD REQUESTED</b>		
<p><i>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.)</i></p>		
Description of record or relevant part of the record:		
Reference number, if available		
Any further particulars of record		
<b>TYPE OF RECORD</b>		
<i>(Mark the applicable box with an "X")</i>		
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	
<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
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	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
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	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

**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:	

**FEEES**

- a) *A request fee must be paid before the request will be considered.*
- b) *You will be notified of the amount of the access fee to be paid.*
- c) *The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*
- d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption*

Reason	

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>Electronic communication (<i>Please specify</i>)</b>

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

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

-----  
-----  
**FOR OFFICIAL USE**

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

\_\_\_\_\_  
**Signature of Information Officer**

## Annexure B

Where a Requester submits a Request for access to information held by Cashbuild Group on a person other than the Requester himself/herself, a Request fee in the amount of R140.00 is payable up-front before Cashbuild Group will further process the Request received. This Request fee may be paid at the time a Request is made, or the person authorised to deal with such Requests on Cashbuild Groups' behalf may notify the Requester to pay the Request fee before processing the Request any further. A Requester may make an application to Court to be exempted from the requirement to pay the Request fee, see section 54(1) and 54(3)(b) of PAIA.

If access to a Record/s is granted by Cashbuild Group, the Requester may be required to pay an access fee for the search for and preparation of the Records and for re-production of the Record/s.

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 specifically excluded in terms of PAIA, or an exclusion is determined by the Minister in terms of section 54(8). Cashbuild Group is entitled to withhold a Record until the required access fees have been paid.

The applicable access fees which will be payable are:

Item	Description	Amount
1.	Request fee, payable by every requester	R140.00
2.	Photocopy (black & white) for every A4 page	R2.00 per page or part of the page
3.	Printed (black & white) copy of A4-size page	R2.00 per page or part of the page
4.	For a copy into a computer-readable form on: <ul style="list-style-type: none"><li>• a flash drive (provided by the requester)</li><li>• a compact disc (CD) if the requester provides the CD to us</li><li>• a compact disc (CD) if we give the CD to the requester</li></ul>	R40.00 R40.00 R60.00
5.	For a transcription of visual images, for an A4-size page or part of the page	This service will be outsourced. The fee will depend on the quotation from the service provider.
6.	For a copy of visual images	This service will be outsourced. The fee will depend on the quotation from the service provider.

Item	Description	Amount
7.	For a transcription of an audio record, per A4-size page	R24.00
8.	<p>For a copy of an audio record on a flash drive (provided by the requester)</p> <p>For a copy of an audio record on compact disc (CD) if the requester provides the CD to us</p> <p>For a copy of an audio record on compact disc (CD) if we give the CD to the requester</p>	<p>R40.00</p> <p>R40.00</p> <p>R60.00</p>
9.	<p>For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure</p> <p>The search and preparation fee cannot exceed</p>	<p>R145.00</p> <p>R435.00</p>
10.	Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 2 to 8 above.
11.	Postage, email or any other electronic transfer	Actual expense, if any.

**POPIA FORM 1**

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

**[Regulation 2]**

Note:

1. Affidavits or other documentary evidence in support of the objection must be attached.
2. Requests made on behalf of another person, must be accompanied by proof of such authorisation.
3. 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/registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
	Code (                    )
Contact number(s) :	
E-mail address:	
Capacity in which request is made, when made on behalf of another person:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code (                    )
Contact number(s) :	
E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

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

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

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

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

**[Regulation 3]**

Note:

1. Affidavits or other documentary evidence in support of the request must be attached.
2. Requests made on behalf of another person, must be accompanied by proof of such authorisation.
3. 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>	<b>DETAILS OF DATA SUBJECT</b>
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code (                    )
Contact number(s):	
E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code (                    )
Contact number(s):	
E-mail address:	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED</b>
<b>D</b>	<p><b>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or</b></p> <p><b>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</b></p> <p><i>(Please provide detailed reasons for the request)</i></p>


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

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

**FORM 3**  
**OUTCOME OF REQUEST AND OF FEES PAYABLE**  
**[Regulation 8]**

Note:

1. If your request is granted the—
  - (a) amount of the deposit, (if any), is payable before your request is processed; and
  - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

Personal inspection of information 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> ) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
---	--

**OR**

**2. You requested:**

Printed copies of the information ( <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 information on flash drive ( <i>including virtual images and soundtracks</i> )	
Copy of information on compact disc drive ( <i>including virtual images and soundtracks</i> )	
Copy of record saved on cloud storage server	

**3. To be submitted**

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: ( <i>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</i> )	

Kindly note that your request has

been:  Approved

Denied, for the following reasons:

--

**4. Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

**5. Deposit payable (if search exceeds six hours):**

Yes  No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_  
 Name of account holder: \_\_\_\_\_  
 Type of account: \_\_\_\_\_  
 Account number: \_\_\_\_\_  
 Branch Code: \_\_\_\_\_  
 Reference Nr: \_\_\_\_\_  
 Submit proof of payment to: \_\_\_\_\_

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

\_\_\_\_\_  
*Information officer*