

**POLICY STATEMENT AND MANUAL**

in respect of

**ACCESS TO INFORMATION, PROTECTION OF  
PERSONAL INFORMATION AND THE RETENTION OF  
DOCUMENTS**

for

**SOUTH AFRICAN ORTHOPAEDIC ASSOCIATION**

*(an association within the South African Medical Association NPC, which is an  
association incorporated under section 23 of the Companies Act, 1973,  
with registration number 05/00136/08)*

(hereinafter referred to as “**the Association**”)

**PREPARED IN ACCORDANCE WITH SECTION 51 OF  
THE PROMOTION OF ACCESS TO INFORMATION ACT, 2  
OF 2000 AND TO ADDRESS REQUIREMENTS OF THE  
PROTECTION OF PERSONAL INFORMATION ACT, 4 OF  
2013**

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## POLICY STATEMENT AND MANUAL

### 1. DEFINITIONS

1.1 The following words, unless otherwise defined, shall bear the same meaning as under PAIA and POPIA, as the case may be:

"Consent"	a voluntary, specific and informed expression of will in terms of which a Data Subject agrees to the Processing of Personal Information relating to him or her;
"Constitution"	the Constitution of the Republic of South Africa, 1996
"Data Subject"	the person to whom Personal Information relates, who may be a natural or juristic person;
"Information Officer"	the chief executive officer or equivalent officer of the Association or any person duly authorised by that officer; or the person acting as such or any person duly authorised by such acting person, being <b>Refiloe Mbentse</b> whose further particulars appear in clause 9.2.2 of this Manual;
"Information Regulator"	the Information Regulator established in terms of section 39 of POPIA;
"Manual"	this Access to, and Protection of, Personal Information Manual prepared in accordance with section 51 of PAIA and to address the requirements of POPIA;
"PAIA"	the Promotion of Access to Information Act No. 2 of 2000, as amended from time to time;
"Personal Information"	means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including, but not limited to:  (a) 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;

- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the blood type or any other biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) 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;
- (g) the views or opinions of another individual about the person; and
- (h) 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;

<b>"Personal Requester"</b>	a person who requests information about himself/herself/itself;
<b>"POPIA"</b>	the Protection of Personal Information Act No. 4 of 2013;
<b>"Private Body"</b>	a natural person who carries or has carried on any trade, business or profession in that capacity, a partnership or a juristic person, whether existing or terminated, but excluding a Public Body;

<b>"Processing"</b>	<p>any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:</p> <ul style="list-style-type: none"><li>(a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;</li><li>(b) dissemination by means of transmission, distribution or making available in any other form; or</li><li>(c) merging, linking, as well as blocking, degradation, erasure or destruction of information,</li></ul> <p>and <b>"Processed"</b> shall have a corresponding meaning;</p>
<b>"Public Body"</b>	<p>any department or state or administration in the national, provincial or local sphere of government or functionary exercising public power;</p>
<b>"Representative Requester"</b>	<p>a person who requests information relating to and on behalf of another person;</p>
<b>"Responsible Party"</b>	<p>a Public Body or Private Body (as the case may be) or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information;</p>
<b>"Requester"</b>	<p>any person, including, but not limited to, a Public Body or an official thereof, making a request for access to a record of the Association; or a person acting on behalf of such a person;</p>
<b>"RSA"</b>	<p>the Republic of South Africa;</p>
<b>"Third Party Requester"</b>	<p>a person who requests information about</p>

another person;

**A GENERAL**

**2. INTRODUCTION**

2.1 PAIA seeks to give effect to the constitutional right of access to information as contained in section 32 of the Constitution. PAIA seeks to advance the values of transparency and accountability and establishes certain statutory rights of Requesters to access records of a Public Body or Private Body if:

2.1.1 that record is required for the exercise or protection of any rights;

2.1.2 that Requester complies with all the procedural requirements; and

2.1.3 access is not refused in terms of any ground referred to in PAIA.

2.2 POPIA seeks to give effect to the constitutional right to privacy as contained in section 14 of the Bill of Rights. POPIA seeks to safeguard Personal Information by regulating the manner in which it may be Processed by Public and Private Bodies. POPIA provides that Data Subjects have the right to have their Personal Information Processed in accordance with the conditions for the lawful Processing of Personal Information, which are set out in POPIA.

2.3 One of the requirements specified in PAIA is the compilation of an information manual that provides information including the types and categories of records held by a Private Body as well certain information relating to the Processing of Personal Information.

**3. SCOPE AND PURPOSE**

3.1 This Manual serves as the Association's information manual and provides reference to the records held by the Association as well as the Personal Information Processed by the Association from time to time.

3.2 The purpose of this Manual is to:

3.2.1 ensure that the Association complies with PAIA by giving effect to the right to information;

3.2.2 provide a non-exhaustive list of Personal Information, records and other details held or to be collected by the Association, in terms of, *inter alia*, the provisions of POPIA;

- 3.2.3 set out the requirements on how to request Personal Information in terms of PAIA and POPI, as well as the grounds on which a request may be refused; and
- 3.2.4 define the manner and form in which a request for Personal Information must be provided.
- 3.3 This Manual is not exhaustive of, nor does it comprehensively deal with, every procedure provided for in PAIA and/or POPIA. A person seeking any Personal Information or any other specified information of the Association ("**Applicant**") as referred to in POPIA and/or PAIA (as the case may be) as the "Requester", under the control of the Association, must familiarise himself with the provisions of PAIA and/or POPIA before submitting a written request to the Association.
- 3.4 The Association makes no representation and gives no undertaking or warranty that the information referred to in this Manual or any information provided by it to an Applicant is complete or accurate, or that such information is fit for any purpose. All users of any such information shall use such information entirely at their own risk. The Association shall not be liable for any loss, cost, expense, liability or claims, howsoever arising and/or of whatsoever nature, arising from the application of this Manual or of any information provided by the Association or from any error or omission therein.
- 3.5 Any person lawfully accessing and/or using any information supplied by the Association pursuant to a formal request, hereby acknowledges and consents to the fact that he shall abide by these terms and conditions as set out in this Manual, only use the information for the purpose disclosed and for no other purpose, shall treat such information as confidential, within the prescribed limitations of the request and the provisions of applicable laws and hereby irrevocably agree to submit (on an exclusive basis) to the laws of the RSA and to the exclusive jurisdiction of the South African courts in respect of any dispute arising out of the use of this Manual or any Personal Information provided by the Association pursuant to a formal request.
4. **AMENDMENTS TO THIS MANUAL**
- 4.1 Amendments to or a review of this Manual will take place on an *ad hoc* basis but in any event at least once a year.
- 4.2 Clients, employees and other third parties are advised to access the Association's website periodically to inform themselves of any changes to the Manual. Where material changes to the Association's information storage and retention procedures are effected, the Association shall ensure that the relevant Data Subject (including employees and clients) are notified in writing.



5. **PAIA AND POPIA PROVISIONS**

- 5.1 PAIA affords natural and/or juristic persons the right of access to records held by either a Private or Public Body, subject to certain limitations, in order to enable them to exercise or protect their rights.
- 5.2 POPIA affords Data Subjects the right to request access, in accordance with the provisions of POPI, to their Personal Information from any Responsible Party.
- 5.3 POPIA requires that when Processing Private Information, a Responsible Party should give effect to the constitutional right to privacy by safeguarding Private Information, subject to justifiable limitations that are aimed at balancing the right to privacy against other rights, particularly the right of access to information.

6. **THE MAIN ACTIVITIES OF THE ASSOCIATION**

**History**

The Orthopaedic Surgeons' Group was founded within the SA Medical Association in 1942 in Johannesburg at a meeting convened by G.T. (Gumee) du Toit and attended by five local orthopaedic surgeons. All the other orthopaedic surgeons in South Africa soon joined the new group, bringing its total membership to nine. F.P.Fouche was elected its first president.

Early activities of the Group included engaging with the general surgeons in "the battle of the fractures" and supporting the National Council for the Care of Cripples in national Health matters. In 1951 Sir R Watson-Jones invited the OSG to attend the first meeting of the Orthopaedic Associations of the English-speaking World in London and to affiliate with the World Association.

Following this the Association was constituted in November 1952, with an initial membership of 45.

**Activities / Objectives**

Annual Congress: The Association holds an annual scientific meeting, in the first week of September, to advance knowledge and practice of orthopaedic surgery. It jointly organises other national and international conferences.

Subspecialty groups: Various special interest groups within the Association have congresses and instructional courses on an annual or biennial basis.

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Continuing Professional Development (CPD): the Association offers information, advice and assistance on CPD.

Journal: The South African Orthopaedic Journal is the official journal of the Association that promotes literature articles on all aspects of orthopaedic surgery and is an entitlement of membership.

SAOA Bulletin: This bulletin is produced biannually and includes topics of news and local practice. This bulletin is for members only.

Financial Support for Orthopaedic Research and Education: Financial support is given to members who partake in orthopaedic research. Orthopaedic training is complimented by biannual Educational Standards Committee meeting.

Establishes Committees: To advance the aims of the Association and to respond to issues raised by members.

Maintain Dialogue: With national and international bodies responsible for health care; clinical standards; research and education; legal and regulatory issues, and allied matters.

## **B POLICY PREPARED IN ACCORDANCE WITH SECTION 51 OF PAIA**

### **7. INTRODUCTION**

- 7.1 It is the Association's policy to conduct its operations in compliance with all legal and regulatory requirements.
- 7.2 This Manual regulates access to information and records owned, held by or otherwise under the control of the Association, and the release of any such information or records in accordance with the provisions of POPIA read with the provisions of PAIA.

### **8. APPLICABILITY AND AVAILABILITY OF THIS MANUAL**

- 8.1 PAIA gives effect to the constitutional right of access to any information in records held by Public Bodies or Private Bodies that is required for the exercise or protection of any rights. PAIA sets out the procedural requirements attached to requests for information, the requirements which requests must meet, as well as the grounds for refusing requests. This Manual informs Requesters of procedural and other requirements which a request must meet.
- 8.2 PAIA also recognises that the right to access information must be balanced

with other rights and should be subject to limitations including, but not limited to, limitations aimed at the reasonable protection of privacy and commercial confidentiality.

- 8.3 This Manual is available for inspection, free of charge, at the Association's head offices as stipulated in clause 9.2 below, and it has been made available to the South African Human Rights Commission (**SAHRC**).

## 9. **PAIA PROVISIONS**

- 9.1 Section 51 of PAIA requires Private Bodies to compile a Manual setting out the procedure and requirements to be adhered to in seeking to obtain access to information held by that Private Body.

- 9.2 This Manual will be updated as and when the need arises and as soon as any amendments have been finalised, the latest version of the Manual will be made public:

- 9.2.1 through the Association's website: [saoa.org.za](http://saoa.org.za); or alternatively

- 9.2.2 on request from:

The Information Officer: Refiloe Mbentse  
235 Langkloof Street  
Meyersig Lifestyle Estate  
1448  
E-mail: [admin@saoa.org.za](mailto:admin@saoa.org.za)

## 10. **PARTICULARS REQUIRED IN TERMS OF SECTION 51(1)(a) OF PAIA**

<b>Association Name and Registration:</b>	South African Orthopaedic Association (an association within the South African Medical Association NPC, which is an association incorporated under section 23 of the Companies Act, 1973.  Registration Number: 005-344-NPO
<b>Head of the Association: President</b>	Prof Brian Bernstein
Street address	21 Reid St, Westdene, Bloemfontein, 9301
Telephone	051 430 3280
Fax	+27 (0)51 430 3284
Email	admin@saoa.org.za
<b>Authorised Privacy &amp; Information Officer</b>	Refiloe Mbentse
Street Address	235 Langkloof Street, Albertsdal

Postal Address	235 Langkloof Street, Albertsdal, 1448
Telephone	051 430 3280
Fax	
Website	<a href="http://www.saoa.org.za">www.saoa.org.za</a>
E-mail	<a href="mailto:admin@saoa.org.za">admin@saoa.org.za</a>

#### 11. **SOUTH AFRICAN HUMAN RIGHTS COMMISSION GUIDE**

- 11.1 The SAHRC is required, in terms of section 10 of the PAIA, to compile a guide (“**Guide**”) containing information that may reasonably be required by a person who wishes to exercise any right contemplated in PAIA.
- 11.2 The Guide is available for inspection in all official languages from the South African Human Rights Commission at:

PAIA Unit, Forum 3, Braampark Office Park, 33 Hoofd Street, Braamfontein.

Website: <http://www.sahrc.org.za>

#### 12. **AUTOMATIC AVAILABILITY OF DOCUMENTS**

- 12.1 PAIA provides that certain records may automatically be made available. Should records be automatically available, a formal request for such records will not be necessary.
- 12.2 In terms of PAIA, Private Bodies are not obliged to make any records automatically available. This means that a Private Body is not obliged to make such disclosure. If a private company chooses to make such voluntary disclosure, it may do so by giving notice thereof in terms of section 52(2) of PAIA.
- 12.3 At this stage the Association has given notice of any categories of records that are automatically available without a person having to request access in terms of PAIA.

#### 13. **LIST OF RECORDS AND INFORMATION**

- 13.1 A list of the categories of records held by the Association appears in Schedule A annexed hereto. The categories of information are not exhaustive but are merely meant to give a broad indication of the information subject and categories held by the Association, without specification.

13.2 A list of the records held by the Association in accordance with legislation other than POPIA or PAIA appears in Schedule B annexed hereto.

14. **WHO MAY REQUEST INFORMATION OR RECORDS**

14.1 PAIA provides that a person may request information in terms thereof if that information is required for the exercise or protection of a right.

14.2 When making a request, the Requester must:

14.2.1 state that the record requested is required in order to exercise or protect a right;

14.2.2 identify the right and provide details of the nature of the right to be exercised or protected;

14.2.3 explain why the requested record is required for the exercise or protection of that right.

15. **REQUEST**

15.1 A request for access to a record must be made on the prescribed form (a copy of which is annexed as **Schedule C**) ("**Request**") delivered to the Information Officer at his address, facsimile number or e-mail address as provided for in this Manual.

15.2 The Requester must provide sufficient detail on the request form to enable the Information Officer to identify:

15.2.1 the record requested;

15.2.2 the identity of the Requester; and

15.2.3 the form of access required if the request is granted.

15.3 When completing a Request on the prescribed form, the Applicant/Requester should also indicate:

15.3.1 the preferred language if applicable;

15.3.2 whether the Requester wishes to be informed of the decision in another manner in addition to a written reply and the particulars thereof; and

- 15.3.3 a facsimile number, e-mail and/or postal address.
- 15.4 If a Request is made by a Representative Requester, then the Representative Requester must submit proof of the capacity in which the Representative Requester is making the request to the reasonable satisfaction of the Information Officer.
- 15.5 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request verbally to the Information Officer.
- 15.6 Any Request must be directed to the Information Officer or any other authorised persons.
- 15.7 The Request on the prescribed form must be delivered to the Association by hand, via mail, facsimile or e-mail.
- 15.8 The Requester must pay the prescribed fee before any further processing of the Request can be effected/implemented.

16. **PRESCRIBED FEES**

- 16.1 PAIA makes provision for 2 types of fees, namely:
  - 16.1.1 a request fee, which will be a standard fee; and
  - 16.1.2 an access fee, which must be calculated by taking into account reproduction costs, search time, identification and preparation time and cost, as well as postal (delivery) costs.
- 16.2 When the request is received by the Information Officer, such officer must by notice require the Requester, other than a Personal Requester, to pay the prescribed request fee (if any), before further processing of the request.
- 16.3 If the search for the record has been made and the preparation of the record for disclosure, including any arrangement to make the record available as required in the request form, requires more than six hours, the Information Officer shall notify the Requester to pay as a deposit the prescribed portion of the access fee payable.
- 16.4 The Information Officer shall be entitled to withhold a record until the Requester has paid the required fee.
- 16.5 A Requester whose request for access to a record has been granted, is

required to pay an access fee for the reproduction and for the search and preparation, and for any time reasonably required in excess of six hours to search for and prepare the record for disclosure, including making arrangements to make it available in the required form.

- 16.6 If a deposit has been paid in respect of a Request for access that is refused, then the Information Officer must repay the deposit to the Requester within a reasonable period after access has been refused.

**17. DECISION ON REQUEST**

- 17.1 The Association shall, within 30 days , of receipt of a request form, or such shorter period as may be feasible in the circumstances make a decision as to whether to grant or decline the Request and inform the Requester of its decision with adequate reasons for the refusal.
- 17.2 The 30 day period within which the Association has to decide whether to grant or refuse the Request, may be extended for a further period not exceeding 30 days if the Request is for a large amount of records, the Request requires a search for or through a large number of records, or the Request requires a search for records held at other premises, as a result of which the required records cannot reasonably be obtained within the initial 30 day period.
- 17.3 The Association shall notify the Requester in writing should an extension of the prescribed period be required and the reasons for the extension.

**18. GROUND FOR REFUSAL**

The Association may refuse a Request on, amongst others, the following basis:

- 18.1 the mandatory protection of the privacy of a third party who is a natural person, in order to avoid the unreasonable disclosure of Personal Information concerning that natural person (including a deceased individual);
- 18.2 the mandatory protection of the commercial information of a third party, if the record contains:
- 18.2.1 trade secrets of that third party;
- 18.2.2 financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party;  
or

- 18.2.3 information supplied in confidence by a third party, the disclosure of which could reasonably be expected:
  - 18.2.3.1 to put that third party at a disadvantage in contractual or other negotiations; or
  - 18.2.3.2 to prejudice that third party in commercial competition;
- 18.3 the mandatory protection of certain confidential information of third parties if disclosure would constitute an action for breach of a duty of confidence owed to that third party in terms of an agreement;
- 18.4 the mandatory protection of the safety of individuals and the protection of property;
- 18.5 the mandatory protection of records which would be privileged from production in legal proceedings;
- 18.6 the protection of the Association's commercial activities including, without limitation, records that contain:
  - 18.6.1 the Association's trade secrets;
  - 18.6.2 financial, commercial, customer, scientific or technical information, the disclosure of which would be likely to cause harm to the Association's commercial or financial interests;
  - 18.6.3 information, the disclosure of which could reasonably be expected:
    - 18.6.3.1 to put the Association at a disadvantage in contractual or other negotiations; or
    - 18.6.3.2 to prejudice the Association in commercial competition.

19. **THE PRESCRIBED FORMS AND FEES**

The prescribed forms and fees payable in respect of access to records are available on the website of the Department of Justice and Constitutional Development at [www.doj.gov.za](http://www.doj.gov.za) under the legislation section.

20. **RECORDS THAT CANNOT BE FOUND**

- 20.1 If the Association has searched for a record and believes that the record



either does not exist or cannot be found, the Requester will be notified by way of an affidavit or written affirmation.

- 20.2 The affidavit or affirmation shall detail the steps which were taken to locate the requested record.

## **C POLICY ON THE PROTECTION OF PERSONAL INFORMATION ACT**

### **21. INTRODUCTION**

- 21.1 In terms of the provisions of POPIA, the Association must inform Data Subjects formally of the manner in which it collects, uses, discloses and destroys any Personal Information it is required by law to hold.
- 21.2 The type of Personal Information to be collected and retained by the Association will depend on the purpose for which such Personal Information is collected and used. The Association will only collect such Personal Information which it needs to fulfil the relevant purpose and as required by law.
- 21.3 The Data Subject will be informed of the Personal Information that he/she will be required to provide the Association.
- 21.4 The Association guarantees its commitment to use all such reasonable steps to protect the privacy of each Data Subject and ensure that his/her Personal Information will be used appropriately, transparently, securely and in accordance with POPIA.
- 21.5 This Manual sets out how the Association will deal with the Personal Information of Data Subjects as well as the purpose for which the Personal Information will be used.

### **22. IDENTITY AND RESPONSIBILITIES OF THE INFORMATION OFFICER**

- 22.1 The Information Officer of the Association is [INSERT]. His contact details appear in clause 10 of this Manual.
- 22.2 The appointment of the Information Officer will be authorised by the Chief Executive Officer of the Association. Consideration will be given on an annual basis for the re-appointment or replacement of the Information Officer as well as the need for any deputy Information Officer to assist the Information Officer.
- 22.3 The Information Officer's responsibilities include:

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- 22.3.1 the encouragement of compliance by the Association, with the conditions for the lawful processing of Personal Information;
- 22.3.2 dealing with requests made to the Association pursuant to the provisions of POPIA;
- 22.3.3 working with the Information Regulator in relation to investigations conducted pursuant to the provisions of POPIA in relation to the Association;
- 22.3.4 otherwise ensuring compliance by the Association with the provisions of POPIA;
- 22.3.5 maintaining this Manual in accordance with the provisions of POPIA, as amended from time to time;
- 22.3.6 ensuring that POPIA induction training takes place for and in respect of those staff members who Process Personal Information;
- 22.3.7 ensuring that periodic communication awareness in respect of the provisions of the POPIA and the responsibilities arising thereunder takes place;
- 22.3.8 ensuring that the appropriate policies and controls are in place for ensuring that of Personal Information processed by the Association is complete, accurate, not misleading and updated where necessary;
- 22.3.9 ensuring that the appropriate security safeguards for Personal Information are in place, in accordance with the provisions of POPIA;
- 22.3.10 providing direction to any deputy Information Officer, if and when appointed; and
- 22.3.11 any other responsibilities as may be prescribed from time to time.

**23. CONDITIONS FOR LAWFUL PROCESSING OF PERSONAL INFORMATION**

- 23.1 The Association will comply with POPIA in respect of the rights of Data Subjects with regard to their Personal Information, be open and honest in respect of the Personal Information Processed by the Association as well as provide training and support for staff, if and when needed, so that such staff members are aware of their obligations and responsibilities when Processing Personal Information.

- 23.2 The Association is aware that, under POPIA, priority is given to prevent causing harm to Data Subjects by holding Personal Information securely and ensuring that information Processed by them is complete, accurate, not misleading and updated where necessary. The Association is further aware that legitimate concerns exist among Data Subjects in respect to how their Personal Information is Processed. The Association is committed to upholding the eight conditions for the lawful Processing of Personal Information listed in POPIA as well as the provisions of POPIA in general. In this regard:
- 23.2.1 Personal Information will only be Processed if, given the purpose for which it is Processed, it is adequate, relevant and not excessive.
- 23.2.2 Personal Information will only be collected for a specific, explicitly defined and lawful purpose and any further Processing of Personal Information will be in accordance or compatible with the purpose for which it was collected.
- 23.3 The Association will take reasonably practicable steps to ensure that the Personal Information is complete, accurate, not misleading and updated when necessary and will secure the integrity and confidentiality of Personal Information by taking appropriate, reasonable technical and organisational measures.
- 23.4 The Association will ensure that all Data Subjects are aware of what Personal Information relating to them is being Processed, for what purpose it is being processed; what types of disclosures are likely to occur and how to exercise their rights in relation to the said Personal Information.
- 23.5 The Association will adhere to the requirements stipulated in POPIA in respect of the Processing of special Personal Information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasions, health or sex life or biometric information of a Data Subject.

24. **PERSONAL INFORMATION OF MEMBERS**

- 24.1 The Association collects and processes the Personal Information of its members mainly to provide them with access to the services of the Association, to help the Association improve its offerings to its members and for other purposes explained below.
- 24.2 The types of Personal Information which the Association collects from its members includes, but is not limited to:
- 24.2.1 name, identity number, registration number, practice address, postal

- address, e-mail and telephone numbers;
- 24.2.2 members' financial information; and
- 24.2.3 any other information required by the Association in order to provide the members with access to the services provided by the Association.
- 24.3 The Association will use the Personal Information obtained from its members only for the purpose for which it was collected or agreed to with the members, and for any other lawful purpose authorised in terms of POPIA, which may include (but is not limited to):
  - 24.3.1 the conduct of market or customer satisfaction research and for statistical analysis;
  - 24.3.2 evaluation of the services provided by the Association and/or required by the client;
  - 24.3.3 legally required and commercial audit and record keeping purposes;
  - 24.3.4 proposals in respect of products or services (including those provided by third parties) which may be of interest to the member, provided that the member has given the Association its consent to do so, or the member has previously requested a product or service from the Association and the communication is relevant or related to that prior request;
  - 24.3.5 assistance with professional development;
  - 24.3.6 execution of the obligations of the Association in terms of any contractual arrangements relevant to the Association and the member;
  - 24.3.7 notification to the members of any changes to the Association's services;
  - 24.3.8 responses to the member's queries or comments; and
  - 24.3.9 compliance with legal and regulatory requirements or industry codes to which the Association subscribes or which applies to the Association or when it is otherwise prescribed by law.
- 24.4 Where the Association collects the Personal Information of a member for a specific purpose, the Association shall not retain it for longer than necessary to fulfil the particular purpose, unless the Association is required by law or

otherwise to keep it for legitimate business or legal purposes.

- 24.5 Members may opt out of receiving communications from the Association at any time. Any direct marketing communications that the Association sends to Members will provide the Members with the information and the means necessary to decline receipt of such communication.

25. **PERSONAL INFORMATION OF EMPLOYEES**

- 25.1 The Association collects and Processes the Personal Information of its employees for purposes of recruitment, promotion and prescribed health and safety requirements (whether prescribed by law or otherwise) within the Association and, in as far as possible, to provide medical/health assistance when the need arises based on the results of the compulsory medical examinations conducted in respect of the employee.

- 25.2 The type of Personal Information which the Association collects from its employees includes, but is not limited to:

25.2.1 employee's identity number, name, surname, address, postal code, marital status, number of dependants and bank accounts;

25.2.2 the employee's qualifications, biometric information, criminal records, credit records, details of previous employment; and

25.2.3 the results of any medical examinations conducted by the Association in respect of the employee.

- 25.3 Where the Association collects the Personal Information of an employee for a specific purpose, the Association will not keep it for longer than necessary to fulfil that purpose and otherwise as may be prescribed by law.

26. **DISCLOSURE OF PERSONAL INFORMATION**

- 26.1 The Association may disclose a member's Personal Information to approved product or third party service providers whose services or products members elect to use, subject always to the member's prior consent, whether in writing or otherwise.

- 26.2 The Association shall take such steps reasonably necessary to ensure that these third parties comply with confidentiality and privacy conditions as prescribed by law.

- 26.3 The Association may disclose the Personal Information of Data Subjects

where the Association has a duty or a right to disclose in terms of applicable legislation, industry codes or where it may be necessary to protect the rights of the Association.

27. **PERSONAL INFORMATION SECURITY**

- 27.1 The Association is legally obliged to provide adequate protection in respect of the Personal Information it holds and to prevent unauthorised access, disclosure and use of any Personal Information.
- 27.2 The Association shall, on an on-going basis, review its security controls and related processes to ensure that the Personal Information of Data Subjects is secure and retained only for so long as is required by law or needed for record-keeping purposes.
- 27.3 The Association's security policies and procedures include:
- 27.3.1 lawful and reasonable processing of Personal Information as contemplated in section 9 of POPIA;
  - 27.3.2 limitation of access to Personal Information;
  - 27.3.3 computer and network security;
  - 27.3.4 investigation of and prompt response to breaches of security;
  - 27.3.5 monitoring of access and usage of Personal Information;
  - 27.3.6 physical security of hardware and premises where Personal Information is Processed;
  - 27.3.7 appropriate procedures in respect of retention and disposal of Personal Information;
  - 27.3.8 secure communications; and
  - 27.3.9 proper security arrangements in outsourcing of ancillary services or functions.
- 27.4 When the Association contracts with third parties in relation to the management of Personal Information, the Association imposes appropriate security, privacy and confidentiality obligations on them to ensure that the Personal Information under the Association's control will be kept secure at all times.

27.5 The Association will ensure that anyone to whom it discloses any Personal Information, agrees to treat that Personal Information with the same level of protection as the Association is obliged to treat it.

28. **ACCESS TO PERSONAL INFORMATION**

28.1 A Data Subject may, upon proof of identity, request the Association to confirm, free of charge, all the Personal Information it holds about the Data Subject and may request access to such Personal Information, including information about the identity of third parties who have or have had access to such Personal Information.

28.2 POPIA further requires that where the Data Subject is required to pay a fee for services provided to him/her/it arising from the provisions of POPIA, the Responsible Party:

28.2.1 must provide the Data Subject with a written estimate of the amount payable before providing the service; and

28.2.2 may require that the Data Subject pay a deposit for all or part of the amount so payable.

28.3 If a Data Subject objects to the Processing of his/its Personal Information, the Association shall no longer Process the Data Subject's Personal Information, unless otherwise required by law.

28.4 The Association shall take all reasonable steps to confirm the identity of a Data Subject before providing details of its Personal Information or making changes to its Personal Information.

28.5 A Data Subject must contact the Information Officer, whose contact details appear in clause 10 of this Manual to request access to, correction of, or deletion of the Personal Information, pertaining to the Data Subject.

28.6 The request must be in writing, contain sufficient detail for the Information Officer to ascertain and/or identify with a proper degree of certainty the Personal Information to which such request relates.

28.7 Any such request for access to Personal Information may be subject to a payment of a fee as permitted by law and as further set out in this Manual.

D **POLICY ON THE RETENTION AND CONFIDENTIALITY OF DOCUMENTS, INFORMATION AND ELECTRONIC TRANSACTIONS**

29. **INTRODUCTION**

- 29.1 This Manual applies to all documents and electronic transactions generated within and/or received by the Association.
- 29.2 The Association has proper procedures and mechanisms in place for the purpose of exercising effective control over the retention of documents and electronic transactions relating directly and indirectly to Personal Information as prescribed by legislation and as dictated by business practice.
- 29.3 Documents and Personal Information need to be retained for as long as they may be required in order to prove the existence of a factual position at a particular point in time and to provide the Association with the necessary protection to exercise any rights it may have in relation to any matters arising in respect of and/or in relation to the Personal Information (and in certain instances as prescribed by law).
- 29.4 Retention of Personal Information may be:
- 29.4.1 necessary for the defence in a legal dispute and reputational risks;
- 29.4.2 required to protect the privacy rights of the Association and its Data Subjects.

30. **ACCESS TO DOCUMENTS**

- 30.1 All information relating to the Association as well as the Personal Information of Data Subjects must be dealt with in the strictest confidence and may only be disclosed, without fear or redress, in the following circumstances:
- 30.1.1 where disclosure is required by law;
- 30.1.2 where there is a legal duty of disclosure to the public;
- 30.1.3 where the interests of the Association require disclosure; and
- 30.1.4 where disclosure is made with the express or implied consent of the Data Subject.
- 30.2 All employees of the Association have a duty of confidentiality in relation to the Association, its business activities and its clients.
- 30.3 The right to confidentiality of Data Subjects whose Personal Information is Processed by the Association is protected in the Constitution, PAIA, POPIA



and in terms of Electronic Communications and Transactions Act, 25 of 2002 ("ECTA").

- 30.4 Confidential company and/or business information relating to the Association may not be disclosed to any third parties without the consent of the board of directors of the Association as this could constitute industrial espionage. The affairs of the Association must at all times be kept strictly confidential.
- 30.5 The Association views any contravention of this Manual or a breach of confidentiality in respect of its Personal Information or any Personal Information it holds in respect of a third party very seriously and any person, including personnel who are guilty of contravening any provision of this Manual, will be subject to disciplinary procedures, which may lead to the dismissal of the offending party.

## 31. **STORAGE OF DOCUMENTS**

### 31.1 **Hard copies**

- 31.1.1 Documents are stored in storage facilities, primarily located at the head office, the details of which are set out in clause 9.2.2 of this Manual.
- 31.1.2 All documents stored by the Association are kept in hard copy at the Association's head office and requests for the retrieval of stored documents must be sent to the Information Officer who will process the application and, if permitted, retrieve the necessary information in accordance with the provisions of this Manual. Any document(s) delivered to a Requester must be returned to the Information Officer as soon as reasonably possible after use, unless otherwise agreed to in writing.

### 31.2 **Electronic Storage**

- 31.2.1 The internal procedure conducted by the Association in respect of the storage of Personal Information is that same is stored, as far as reasonably possible, on an electronic storage facility.
- 31.2.2 Important documents and sensitive information must be referred to and discussed with the Information Officer who will arrange for the indexing, storage and retrieval thereof. This will be done in conjunction with the relevant department.
- 31.2.3 Any document containing Personal Information of an employee, including employee's name and occupation, time worked by each employee, remuneration and date of birth of an employee, tax details

and health and medical records, must be retained for a period of at least 3 years after termination of employment.

- 31.2.4 Section 51 of the Electronic Communications and Transactions Act, 25 of 2002, requires that personal information and the purpose for which the data was collected must be kept by the person who electronically requests, collects, collates, processes or stores the information and a record of any third party to whom the information was disclosed, must be retained for as long as the information is used and for a period of at least 1 year thereafter.

## 32. **DESTRUCTION OF DOCUMENTS**

- 32.1 Any and all Personal Information which has become obsolete must be destroyed within a reasonable period after becoming obsolete. A certificate of destruction will be obtained for each batch of archived documents destroyed.
- 32.2 Documents may be destroyed after the termination of the retention period specified in **Schedule B** hereto. The Information Officer will request each department to attend to the destruction of documents under its control and these requests shall be attended to as soon as possible.
- 32.3 Each department of the Association shall be responsible to attend to the destruction of documents under its control, which destruction must be done on a regular and consistent basis. Prior to destruction, each file must be verified in order to ensure that it may be destroyed and also to ascertain if there are important original documents in the file. Original documents must be returned to the owner, failing which they should be retained by the Association pending such return.
- 32.4 After completion of the process in clause 32.3 above, the general manager of the relevant department shall, in writing, authorise the removal and destruction of the documents. These records will be destroyed by the Association's nominated agent, from time to time.
- 32.5 The documents identified for destruction shall then be made available for collection by the identified agents of the Association responsible for destruction who shall ensure that the documents are shredded before disposal.
- 32.6 Documents which have been identified for destruction may also be stored off-site in storage facilities approved by the Association pending collection thereof by the identified agents of the Association for destruction.

◆ **SCHEDULE A**

  
ANDERSEN®

### **CATEGORIES AND TYPES OF INFORMATION HELD BY THE COMPANY**

The following categories of records are held by the Association and access may be granted to such records upon proper request and payment of a fee in terms of PAIA and this Manual, unless the Association is entitled to refuse access to such records, or the records are exempted in terms of PAIA:

#### **Contracts and Agreements**

<b>Information Category</b>	<b>Information Category Description</b>
Commercial agreements	These are typical documents which record the agreement between the Association and business partners, suppliers, contractors and is the result of contractual negotiations undertaken previously. These documents are retained by the business unit(s) involved and the Legal Department
Property agreements	Information relating to immovable, movable and incorporeal property of the Association, including asset registers
Contractual issues with business partners	All information relating to reaching an agreement with a business partner, for example correspondence, minutes and notes of meetings prior to the conclusion of the agreement, including details related to the agreement itself
Client information	Full details of the client, including but not limited to, corporate information, trading name of the client, registration number of client, relevant tax registration numbers, principal contact person and their respective contact details, invoices issued etc.

**Commented [MD3]:** This list is simply provided for illustrative purposes. It sets out examples of types of documents a Responsible Party may process. However, you must check both the categories of documents and the descriptions to see that they are applicable to you.

#### **Corporate**

<b>Information Category</b>	<b>Information Category Description</b>
Constitutional documents of all the entities in the Association	Certificate of Incorporation, certificate to commence business, articles of association and memorandum of association or memorandum of incorporation, directors register, confirmation of registered address,

	information of auditors, financial year end
Other company secretarial documents	Share registers, share certificates, corporate structure diagrams, documents relating to share incentive schemes
Minutes and resolutions	Minutes of meetings, Executive Committee resolutions, proxy forms

### Legal

Information Category	Information Category Description
Legal Records	<p>Copies of Agreements (relating to, amongst others, Joint Ventures, partnerships, shareholders agreements, leases, financial agreements, sale agreements, restraint agreements and warranties)</p> <p>General Correspondence</p> <p>Immovable Property Records</p> <p>Internal Reports and Communications</p> <p>Statutory Records</p> <p>Working Files</p>
Litigation	Pleadings, briefs and any other records relating to threatened, pending or past litigation, arbitration or investigation
Legal Compliance	Certificates, licences and permits

### Management

Information Category	Information Category Description
Project Activity and Schedule	Details of projects (tasks, resources, dependencies, durations, etc.)

	This records the status and overarching objectives of each project.
--	---

### Financial

Information Category	Information Category Description
Consolidated and audited annual Financial Statements for the Association	<p>This contains information as recorded in the consolidated financial statements of the Association in respect of the various business operations / divisions and their performance in the preceding financial year.</p> <p>This includes accounting records (ledgers and journals), audited financial statements, agreements, tax records and VAT returns, banking records (including cheques and deposit slips), invoices, statements, delivery notes, receipts, vouchers and bills of exchange, directors reports, asset registers, management accounts, debtors &amp; creditors, statements of financial position, budgets and business plans, internal audit reports and independent auditors reports.</p>

### Customer Information

Information Category	Information Category Description
Customer Profile	Information relating to the customer profile, e.g. which services are activated.
Customer Type	Information relating to the customer type, e.g. private company or municipality.
Payment History	Information relating to payments made.

### Organisation Structure and Position

Information Category	Information Category Description
Archive of Senior Management Photographs	Photographs of committee members and

<b>Information Category</b>	<b>Information Category Description</b>
	senior management
Job Profiling	The categorisation of responsibilities associated with an employment position
Organisational Structure	The structure of the organisation into business units, commonly depicted in an organogram. This usually includes the top "n" levels of an organisation, for example the executive directors, name of departments reporting into their business units and position.
Position	The title and responsibilities of employment positions, including information related to the role and current incumbents. This includes information on contractors and other non-permanent staff members.

#### **Performance and Remuneration**

<b>Information Category</b>	<b>Information Category Description</b>
Employee Performance Record	The records relating to the employee performance, for example performance awards
Employee Timesheet Information	The records relating to the working hours' availability of an employee
Payroll	All information relating to payments made to employees in the Association
Salary/Incentive/Bonus	Information relating to each employee's cost to company

**Labour and Personnel Detail**

<b>Information Category</b>	<b>Information Category Description</b>
General	Employee information records (names, dates of birth, occupations, working hours / shifts, remuneration), tax and other returns (UIF, PAYE,SDL), employment contracts, policies and procedures, incentive schemes, employee loans, expense accounts study assistance schemes, disability schemes, scholarships/bursaries, recruitment and appointments, collective agreements, arbitration awards, records of strikes, lockouts or protest action.
Curriculum Vitae (CV) and Application Detail	Details of applicants for employment, including CV details
Disciplinary Record	Records of disciplinary hearings
Employee Lifecycle Information	The information about an employee's "life" at the Association, i.e. when joined, promoted, positions held etc.
Employee Personal Detail	Personal details kept on employees, for example, next of kin, medical details, address details and primary contact details

**Personnel and other development Programmes**

<b>Information Category</b>	<b>Information Category Description</b>
Skill Level	The skills required for positions
Training Event / Course	Details of training courses available and held
Sustainable development	Details of sustainable development projects available and held

**Risk and Governance**

<b>Information Category</b>	<b>Information Category Description</b>
Inspection/Audit	Results of inspections and audits
Risk and Control	Details of known risks and measures to control those risks
Reports	These includes Sustainability reports, Corporate Governance reports and Remuneration reports

**Administration**

<b>Information Category</b>	<b>Information Category Description</b>
Administration	Correspondence, company policies and company procedures

**Marketing and Advertising**

<b>Information Category</b>	<b>Information Category Description</b>
Marketing and advertising	Brand policy and standards, brand and advertising material, print and audio-visual advertisements, brochures, newsletters advertising material, service and product information, media releases, website



**Fixed property**

Information Category	Information Category Description
Records	Title deeds, leases, building plans, zoning certificates, mortgage bonds and other encumbrances

**Intellectual Property and Innovations**

Information Category	Information Category Description
Patents and designs	Assignment, cession, transfer or licencing of patents and designs  Patent applications and inventions
Trademarks	Designs, trademarks, trade names and protected names  Assignment, cession, transfer or licencing of patents and designs of trademarks
Copyright	Assignment, cession, transfer or licencing of copyright material
General	Agreements relating to intellectual property ( <i>inter alia</i> licence agreements, use agreements, licence agreements, secrecy agreements)

**Insurance**

Information Category	Information Category Description
Records	Production and group liability policies and other insurance policies, claim documents, personal accident benefit rules, vehicle insurance, company procedures and details of insurance coverage, limits and insurers etc.

**Environmental, health and safety**

Information Category	Information Category Description
Safety, Health and Environment records	<p>Health and Safety Policy, environmental impact assessments, reports relating to investigation and reporting of health and safety incidents, policies regarding managing and optimising health and hygiene in the workplace, policies on treatment of solid waste and effluent, annual health risk assessments of employees</p> <p>Association policies and procedures</p> <p>Staff training records, emergency response plans, and disposal, treatment and recycling</p>

#### Logistics

Information Category	Information Category Description
Agreements	

#### Operational

Information Category	Information Category Description
Agreements and other	

#### Information technology

Information Category	Information Category Description
Records	Software packages, licences, capacity and utilization of current systems, disaster recovery processes and procedures, client database, hardware, internet, security and maintenance.

#### Miscellaneous

<b>Information Category</b>	<b>Information Category Description</b>
Records	Records relating to the Association or its business which are held by any other party  Records held by the Association relating to any other party (including financial records, correspondence, contractual agreements, records provided by such other party, records provided by third parties about such other party)

**SCHEDULE B**  
**SUMMARY OF APPLICABLE LEGISLATION IN RESPECT OF WHICH RECORDS**  
**ARE TO BE KEPT**

The Association retains records in accordance with the following current RSA legislation and any amendments thereto (only to the extent that the relevant statute is applicable and makes disclosure of records compulsory):

- Basic Conditions of Employment Act No. 75 of 1997
- Broad Based Black Economic Empowerment Act No. 53 of 2003
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Disease Act No. 130 of 1993
- Competition Act No. 89 of 1998 as amended
- Consumer Protection Act 68 of 2008
- Copyright Act No. 98 of 1978
- Electronic Communications Amendment Act No. 1 of 2014
- Electronic Communications and Transactions Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Environment Conservation Act No.73 of 1989
- Environmental Laws Rationalisation Act No. 51 of 1997
- Financial Intelligence Centre Act No. 38 of 2001 6
- Hazardous Substances Act No. 15 of 1973
- Health Professions Act No. 56 of 1974
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- Medical Schemes Act No. 131 of 1998
- Medicines and related Substances Control Act No. 101 of 1965
- National Credit Act No. 34 of 2005
- National Environmental Management Act No. 107 of 1998
- National Environmental Management: Air Quality Act No. 39 of 2004
- National Environmental Management: Biodiversity Act No. 10 of 2004
- National Environmental Management: Protected Areas Act No. 57 of 2003
- National Environmental Management: Waste Act No. 59 of 2008
- National Road Traffic Act No. 93 of 1996
- National Water Act No. 36 of 1998

- Occupational Health and Safety Act No. 85 of 1993
- Patents Act No. 57 of 1978
- Pension Funds Act No. 24 of 1956
- Prescription Act No. 68 of 1969
- Promotion of Access to Information Act No. 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2000
- Regulation of Interception of Communications and Provision of Communication – Related Information Act No. 70 of 2002
- Securities Transfer Tax Act 25 of 2007
- Securities Transfer Tax Administration Act No. 26 of 2007
- Skills Development Levies Act No. 9 of 1999 Skills Development Act No. 97 of 1998
- Stock Exchange Control Act No. 1 of 1985
- Tax Administration Act No. 28 of 2011
- Tobacco Products Control Act No. 83 of 1993
- Trademarks Act No. 194 of 1993
- Transfer Duty Act No. 40 of 1949
- Unemployment Insurance Act No. 63 of 2001
- Unemployment Insurance Contributions Act No. 4 of 2002
- Value Added Tax Act No. 89 of 1991
- Water Services Act No. 108 of 1997

**REQUEST FORM**

**REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY**

**(Section 53(1) of the Promotion of Access to Information Act No. 2 of 2000)**

[Regulation 10]

**A. Particulars of private body**

The Information Officer:

.....  
.....  
.....  
.....

**B. Particulars of person requesting access to the record**

- (a) The particulars of the person who requests access to the record must be given below.
- (b) The address and/or fax number in the Republic to which the information is to be sent must be given.
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.

◆ Full names and surname:  
.....

◆ Identity number:  
.....

◆ Postal address:  
.....  
.....

◆ Telephone number: (.....) .....

◆ Fax number: (.....) .....



- ◆ E-mail address: .....
- ◆ Capacity in which request is made, when made on behalf of another person:  
.....
- ◆ .....

**C. Particulars of person on whose behalf request is made**

(This section must be completed ONLY if a request for information is made on behalf of another person)

Full names and surname: .....

Identity number: .....

**D. Particulars of record**

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

- ◆ Description of record or relevant part of the record:  
.....  
.....  
.....  
.....  
.....

Reference number, if available:  
.....

Any further particulars of record:  
.....  
.....  
.....  
.....

**E. Fees**

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee. (c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- (c) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

◆ Reason for exemption from payment of fees:  
 .....  
 .....  
 .....  
 .....  
 .....

**F. Form of access to records**

◆ If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Mark the appropriate box with an <b>X</b> .  NOTES:  (a) Compliance with your request for access in the specified form may depend on the form in which the record is available.  (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.  (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	
1.	<b>If the record is in written or printed form:</b>



		Copy of record*		Inspection of record
<b>2.</b>	<b>If record consists of visual images</b>  (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):			
		View the images		Copy the images*
				Transcription of the images*
<b>3.</b>	<b>If record consists of recorded words or information which can be reproduced in sound:</b>			
		Listen to soundtrack (audio cassette)		Transcription of soundtrack* (written or printed documents)
<b>4.</b>	<b>If record is held on computer or in an electronic or machine-readable form:</b>			
		Printed copy of record*		printed copy of information derived from the record*
				copy in computer readable form* (stiffy or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?				YES
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?				NO
<b>Postage is payable.</b>				

**G. Particulars of right to be exercised or protected**

If the provided space is inadequate, please continue on a separate folio and attach it to this form.

**The requester must sign all the additional folios.**

Indicate which right is to be exercised or protected:

.....  
 .....  
 .....  
 .....

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

.....  
.....  
.....  
.....  
.....  
.....  
.....

**H. Notice of decision regarding request for access**

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

.....  
.....  
.....  
.....

◆

Signed at ..... on this the .....day of  
..... 20 .....

◆

.....

**SIGNATURE OF REQUESTER/  
PERSON ON WHOSE BEHALF REQUEST IS MADE**