

**PAIA MANUAL
OF
NAMIB MILLS
SOUTH
AFRICA
(PTY) LTD**

**Registration Number:
1946/020747/07**

Prepared and compiled on 22/09/2025 in accordance with
Section 51 of the Promotion of Access to Information Act
02 of 2000 (as amended)

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1. List of acronyms and abbreviations

TERM	DEFINITION
“Data Subject”	means the person to whom Personal Information relates, as contemplated in terms of section 1 of the POPIA;
“Deputy Information Officer”	means a Deputy Information Officer designated in terms of section 56 of the POPIA;
“Information Officer”	means in the case of a juristic person, i. the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or ii. the person who is acting as such or any person duly authorised by such acting person as contemplated in section 1 of the Act;
“Information Regulator”	means the Information Regulator established in terms of section 39 of POPIA;
“Manual”	means this manual compiled by Namib Mills South Africa (Pty) Ltd in terms of PAIA and POPIA;
“PAIA”	means the Promotion of Access to Information Act, 2 of 2000, including the PAIA regulations, as amended from time to time;
“Personal Information”	means information relating to an identified, or identifiable, living natural person and, where applicable, an identifiable existing juristic person as contemplated in the POPIA;
“Personnel”	means all partners, directors, officers, employees, individual contractors and other personnel of Namib Mills South Africa (Pty) Ltd;
“POPIA”	means the Protection of Personal Information Act, 4 of 2013, including the POPIA regulations, as amended from time to time;
“Processing”	means any operation, activity or set of operations, whether or not by automated means, concerning Personal Information as contemplated in the POPIA;
“Private Body”	means any former or existing juristic person, as contemplated in the Act and POPIA;
“Record”	means a record as contemplated in PAIA and includes Personal Information;
“Requester”	means, in relation to a Private Body, iii. any person, including, but not limited to, a public body or an official thereof, making a request for access to a Record of that Private Body; or iv. a person acting on behalf of such person as contemplated in the Act;
“Responsible Party”	means a public or Private Body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information as contemplated in the POPIA;

2. Purpose of the PAIA Manual

To promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of PAIA, in order for them to exercise their rights in relation to public and private bodies.

Wherever reference is made to “Private Body” in this manual, it will refer to Namib Mills South Africa (Pty) Ltd.

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 a 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 Officer 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 Information 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 of the Private Body

3.1. Information Officer

Name: Carel Johannes Christiaan DeWet

Surname: Burger

Telephone No: (010) 446 0400

E-mail: dburger@namibmills.co.za

3.2. Deputy Information Officer(s)

Name: Natasha Himezembi

Surname: Tjiueza

Telephone No: (010) 446 0400

E-mail: ntjiueza@namibmills.com.na

3.3. Access to information general contact

Email: cbaird@namibmills.co.za

3.4. Head Office

Postal Address: 59 Regency Dr, Route 21 Business Park, Centurion, 0178

Physical Address: 59 Regency Dr, Route 21 Business Park, Centurion, 0178

Telephone No: (011) 812 9800

E-mail: cbaird@namibmills.co.za

Website: <https://www.namibmills.com/>

4. Guide on how to use PAIA and how to obtain access to the Guide

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

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

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 PAIA¹ and section 56 of POPIA²;
- 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 11³; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50⁴;
- 4.3.4 the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- 4.3.5 the assistance available from the Information 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 Information 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 Information Regulator or a decision of the head of a private body;
- 4.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

¹ 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.

² 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.

³ 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.

⁴ 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.

⁵ 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.

⁶ 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.

- 4.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10 the regulations made in terms of section 92¹¹.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Information Regulator, during normal working hours.
- 4.5. The Guide can also be obtained -
 - 4.5.1 upon request to the Information Officer;
 - 4.5.2 from the website of the Information Regulator (<https://info regulator.org.za/>).
- 4.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours - in English and Afrikaans.

⁷ 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.

⁸ 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.

⁹ 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.

¹⁰ 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.

¹¹ Section 92(1) of PAIA provides that – “The Minister may, by notice in the Gazette, make regulations regarding-

- a) any matter which is required or permitted by this Act to be prescribed;
- b) any matter relating to the fees contemplated in sections 22 and 54;
- c) any notice required by this Act;
- d) 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
- e) any administrative or procedural matter necessary to give effect to the provisions of this Act.

5. Categories of records of the Private Body which are available without a person having to request access

<i>Category of records</i>	<i>Types of the Record</i>	<i>Available on Website</i>	<i>Available upon request</i>
Client	Invoice		X
	Quotation		X
	Price List		X
	Company Profile	X	X
	Physical Address	X	X
	Contact Details	X	X
	Services	X	X
	News about the Company	X	
	Meet the Team	X	

6. Description of the records of the Private Body which are available in accordance with any other legislation

<i>Category of records</i>	<i>Types of the Record</i>
Corporate and Company Records	Memorandum of Incorporation (MOI) – Companies Act 71 of 2008 Company registration documents – Companies Act 71 of 2008 Share registers and director records – Companies Act 71 of 2008
Access to Information	PAIA Manual – Promotion of Access to Information Act 2 of 2000
Financial and Tax Records	Income Tax records – Income Tax Act 58 of 1962 VAT records – Value-Added Tax Act 89 of 1991 Customs and Excise records – Customs and Excise Act 91 of 1964 Tax compliance and submissions – Tax Administration Act 28 of 2011
Labour and Employment Records	Employment contracts and personnel records – <i>Labour Relations Act 66 of 1995</i> Leave, working hours and remuneration records – <i>Basic Conditions of Employment Act 75 of 1997</i> Employment equity plans and reports – <i>Employment Equity Act 55 of 1998</i> Skills development plans and training records – <i>Skills Development Act 97 of 1998</i> UIF records – <i>Unemployment Insurance Act 63 of 2001</i> Health and safety records – <i>Occupational Health and Safety Act 85 of 1993</i>
Data Protection and Information Security (South Africa)	Privacy notices, processing records and operator agreements – <i>Protection of Personal Information Act (POPIA) 4 of 2013</i> Electronic records and communications – <i>Electronic Communications and Transactions Act 25 of 2002</i>
Data Protection and Privacy (Namibia – where applicable)	Employee and customer records processed in Namibia – <i>Namibian Constitution (Article 13 – Right to Privacy)</i> Data governance and information security records – <i>Draft Namibian Data Protection Bill</i> (not yet enacted, applied as best practice)
Financial Reporting and Compliance	Customer due diligence and transactional records – <i>Financial Intelligence Centre Act (FICA) 38 of 2001</i>

	Audited financial statements and compliance records – <i>Companies Act 71 of 2008</i>
Consumer and Commercial Records	Consumer agreements, complaints and returns – <i>Consumer Protection Act 68 of 2008</i> Sales, marketing and pricing records – <i>Consumer Protection Act 68 of 2008</i>
Transformation and Empowerment	B-BBEE verification certificates and supporting records – <i>Broad-Based Black Economic Empowerment Act 53 of 2003</i>
Credit and Payment Records (if applicable)	Credit agreements, customer vetting and payment histories – <i>National Credit Act 34 of 2005</i>
Environmental, Health and Safety Records	Environmental compliance, waste management and sustainability records – National Environmental Management Act 107 of 1998 Food safety and production-related compliance records – applicable sectoral standards and regulations
Sector-Specific or Operational Records	Manufacturing, quality control and production records – applicable industry standards and regulations Logistics and distribution records – applicable transport and supply chain legislation

7. Description of the subjects on which the Private Body holds records and categories of records held on each subject by the Private Body

<i>Subjects on which the body holds records</i>	<i>Categories of records</i>
Strategic Documents, Plans and Proposals	<ul style="list-style-type: none"> - Annual Reports - Strategic Business Plans - Operational Plans - Health, Safety and Environmental Management Plans - Risk Management Plans - Corporate Governance Documents - Marketing Strategies and Product Development Proposals - Sustainability and ESG Reports - Market Expansion and Regional Growth Strategies
Human Resources (Employees & Contractors)	<ul style="list-style-type: none"> - HR Policies and Procedures - Recruitment and Employment Records

	<ul style="list-style-type: none"> - Employee Personal Files - Employment Contracts and Amendments - Leave Records, Payroll Information & Benefits Administration - Performance Appraisals - Training & Skills Development Records - Disciplinary Records - Occupational Health & Safety Records - Time & Attendance Data - Access Control Permissions - Retirement Fund and Benefits Documentation
PAIA / POPIA / Namibian Data Protection Compliance	<ul style="list-style-type: none"> - PAIA Manual (South Africa) - POPIA Compliance Framework (South Africa) - Namibian Data Protection Procedures & Guidelines - Information Officer / Deputy IO Documentation - Internal Privacy Notices & Consent Forms - Data Processing Agreements (DPAs & Operator/Processor Contracts) - Records of Data Subject Access Requests (DSARs) - Internal SOPs, Risk Assessments and Compliance Reports
Information Technology (IT)	<ul style="list-style-type: none"> - Incident Reports and Service Requests - Asset Registers, Issuing Records & Custodian Assignments - Device and Hardware Inventory - System Event Logs & Security Logs - Network Architecture and Performance Logs - User Access Management Records - System Maintenance Checklists - Monthly IT Operations Reports - IT Vendor Contracts & SLAs - ICT Policies & Procedures - Backup Logs and Disaster Recovery Documentation

	<ul style="list-style-type: none"> - Cybersecurity Assessment Reports
Operational, Manufacturing, SHEQ (Safety, Health, Environment, Quality)	<ul style="list-style-type: none"> - Production Schedules and Manufacturing Records - Quality Control (QC) Reports - Product Safety Data Sheets (SDS) - Workplace Health & Safety Compliance Records - Chemical Handling & Hazardous Materials Documentation - Incident / Accident Logs - Environmental Impact Assessments - Waste Disposal & Emissions Records - Stock Management & Inventory Reports - Plant Maintenance Logs - Food Safety Records (e.g., HACCP, ISO standards)
Finance	<ul style="list-style-type: none"> - Financial Accounting and Reporting Records - Invoices, Statements, Credit Notes - Procurement and Contract Documentation - Tender/Supplier Evaluation Records - Asset Registers - Budgets, Forecasts, Management Accounts - Annual Financial Statements - External and Internal Audit Files - Taxation Records - Banking and Reconciliation Records - Insurance Policies and Claims Documentation
Clients / Suppliers / Service Providers / Public Tenders (SA & Namibia)	<p><u>Company Information:</u></p> <ul style="list-style-type: none"> - Registered Company Name & Trading Name - Registration Documents (CIPC / BIPA) - VAT Numbers - Physical & Postal Address - Delivery/Collection Address - Director/Representative Identification Details (where lawful & required) - BEE Certificates (SA only)

	<ul style="list-style-type: none"> - Banking Details - Contact Person Information (name, phone, email) <p><u>Personal Information (Designated Contact Persons):</u></p> <ul style="list-style-type: none"> - Title, Full Name, Surname - ID/Passport Number (only if required for verification/contractual purpose) - Contact Details (email, phone, addresses) - Driver's License (where relevant) - Employment Information (designation) - Next of Kin Details (if required for on-site safety) <p><u>Contractual and Operational Records:</u></p> <ul style="list-style-type: none"> - Purchase Orders, Quotations, SLAs - Delivery Notes and Correspondence - Supplier Onboarding Documentation - Credit Applications and Terms of Trade - Product Supply and Distribution Agreements
Directors / Shareholders / Employees (Governance & Admin)	<ul style="list-style-type: none"> - Full Name, Surname, ID/Passport Number - Contact Details - Banking Details - Income Tax Number - Qualifications and Professional Information - Driver's License Information - Statutory Compliance Information (PAYE, UIF, SDL, Social Security Namibia) - Next of Kin Information - Share Certificates and Shareholding Records <p><u>Special Personal Information:</u></p> <ul style="list-style-type: none"> - Gender, Nationality - Medical Fitness Information required for employment - Assessment / Psychometric Results

	<p><u>Medical Aid Details (if applicable):</u></p> <ul style="list-style-type: none"> - Medical Aid Name & Plan - Medical Aid Membership Number - Main Member Details <p><u>Occupational Medical History:</u></p> <ul style="list-style-type: none"> - Allergies and workplace-related medical conditions - Baseline, periodic and exit medicals - OHS Health Surveillance Records
Product Information and Regulatory Compliance	<ul style="list-style-type: none"> - Product Registration Certificates - Agricultural and Milling Regulatory Documentation - Technical Product Specifications - Product Labels and Packaging Information - Compliance Certificates & Audit Reports - Environmental, Food Safety and Hazardous Goods Compliance Records
Marketing and Sales Records	<ul style="list-style-type: none"> - Customer Databases - Sales Reports & CRM Data - Promotional Campaign Records - Market Research and Surveys - Advertising Material - Social Media Analytics - Website Analytics (traffic, engagement, cookies disclosure records)
Security and Access Control	<ul style="list-style-type: none"> - CCTV Footage (factories, depots, offices) - Access Control Logs (cards, biometrics where used) - Visitor Registers & Contractor Access Records - Vehicle Entry/Exit Logs - Security Incident Reports

8. Processing of personal information

8.1. Purpose of processing personal information

<i>Categories of Data Subjects</i>	<i>Purpose for processing Personal Information</i>
Employees	<ul style="list-style-type: none"> - To comply with employment-related, labour and tax legislation (including BCEA, LRA, EEA, UIF, PAYE, SDL, COIDA and occupational health and safety legislation) - Recruitment, selection, appointment, promotion, transfer and termination of employment - Administration of salaries, wages, benefits, incentives and payroll - Performance management, training, skills development and succession planning - Disciplinary, incapacity and grievance proceedings - Occupational health and safety compliance, access control and incident management - Management of employment relationships, workforce planning and internal communications - Maintenance of personnel records for legal, audit, operational and record-keeping purposes
Job Applicants	<ul style="list-style-type: none"> - To assess suitability for employment - To conduct reference, qualification and background checks (where lawful and relevant) - To communicate with applicants regarding recruitment processes and outcomes - To retain recruitment records for statutory and record-keeping purposes
Service Providers / Suppliers	<ul style="list-style-type: none"> - To conclude, administer and manage supplier, distributor and service provider contracts and service level agreements - Supplier onboarding, due diligence and compliance verification - To manage procurement, logistics and supplier relationships

	<ul style="list-style-type: none"> - To process payments and maintain financial and accounting records - To collect and maintain contact, registration and banking information - To comply with applicable tax, financial and commercial legislation - For audit, risk management and record-keeping purposes
Clients / Customers (Retail, Wholesale and Commercial)	<ul style="list-style-type: none"> - To market, sell, distribute and deliver food products and related services - To conclude and administer sales agreements and customer accounts - To manage orders, deliveries, pricing, rebates and promotions - To process payments, invoices, statements and credit control (where applicable) - To manage customer queries, complaints and product support - To communicate regarding products, availability, recalls, promotions and service updates - To comply with food safety, consumer protection and other legal and regulatory obligations - For audit, quality assurance and record-keeping purposes
Distributors and Logistics Partners	<ul style="list-style-type: none"> - To conclude and manage distribution and logistics agreements - To coordinate deliveries, transport and supply chain activities - To process payments and maintain operational and financial records - For compliance, audit and record-keeping purposes
Directors and Officers	<ul style="list-style-type: none"> - To comply with company law, governance and statutory requirements - To maintain statutory registers and records - To administer remuneration and benefits (where applicable) - To communicate on governance, compliance and corporate matters

Contractors and Temporary Workers	<ul style="list-style-type: none"> - To conclude and manage contracts and assignments - To verify qualifications, experience and fitness for work where required - To manage access to premises and systems - To process payments and maintain financial and operational records - For legal, audit and record-keeping purposes
Website Users and Enquirers	<ul style="list-style-type: none"> - To respond to enquiries, requests and feedback - To administer website functionality, security and analytics - To manage marketing communications (subject to consent where required) - To comply with POPIA and electronic communications legislation

8.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

<i>Categories of Data Subjects</i>	<i>Personal Information that may be processed</i>
Employees	Full names and surnames; identity numbers and copies of IDs (where lawfully required); date of birth; contact details (phone, email); physical and postal addresses; employment history and qualifications; employment contracts; performance and training records; disciplinary records; leave and attendance records; payroll and benefits information; tax numbers; statutory contributions (PAYE, UIF, SDL etc.); banking details; next-of-kin information; emergency contact details; access control and IT credential data; health and safety incident records (limited to what is lawful).
Job Applicants	Names and surnames; contact details; CV/resume; qualifications and certifications; interview assessments; reference details; background check results (where lawful).
Clients / Customers (Retail and Commercial)	Company name and registration details (if applicable); designated contact person's

	name and surname; contact details; delivery and billing addresses; order history; payment and transaction details; communications and correspondence; marketing preferences (where consent applies).
Service Providers / Suppliers	Business name and registration details; VAT number; designated contact person's name and surname; contact details; banking information; contractual documents; service and delivery records; invoice and payment details.
Directors and Shareholders	Full names and surnames; identity numbers (where applicable); contact details; addresses; shareholding information; governance and compliance documentation; tax numbers.
Contractors / Consultants	Full names and surnames; identity/passport numbers; contact details; qualifications and experience; contract records; banking and payment details; tax numbers.
Website Users and Enquirers	Names and surnames (when provided); contact details; enquiry details; IP addresses; device/browser information; cookies and usage data (subject to consent where required).

8.3. **The recipients or categories of recipients to whom the personal information may be supplied**

<i>Category of personal information</i>	<i>Recipients or Categories of Recipients to whom the personal information may be supplied</i>
Employee personal and employment data	Internal HR, payroll and management teams; South African Revenue Service (SARS); Department of Employment and Labour (S.A.); UIF and other statutory bodies (S.A.); auditors; employment benefit administrators (e.g., pension/provident funds, medical aid); insurers; banks and payment service providers; legal advisors.
Job applicant information	Internal HR and hiring managers; recruitment agencies (if used); background/reference check service providers (where lawful); legal advisors.
Client / customer information	Internal sales, customer service and accounts teams; logistics and delivery partners; banks and payment processors; auditors; legal advisors; marketing service providers (where required with consent).
Supplier / service provider information	Internal procurement and finance teams; banks and payment processors; auditors; legal advisors; logistics partners.
Director / shareholder information	Companies and Intellectual Property Commission (CIPC — South Africa); SARS; banks; auditors; legal and corporate secretarial service providers.
Contractor / consultant information	Internal management; banks and payment processors; auditors; legal advisors; IT and access control service providers.
Website user and enquirer information	Website hosting and analytics service providers (e.g., IT/CRM/hosting partners); advertising and marketing partners (with consent as required); law enforcement or regulators when obliged by law.
All categories	Third-party processors acting on behalf of Namib Mills under written agreements (e.g., cloud/IT service providers), subject to POPIA conditions on operators/processing agreements; regulators, courts or law enforcement where required by law or subpoena.

8.4. **Planned transborder flow of personal information**

We may transfer personal information outside of the Republic of South Africa where required for lawful operational purposes.

In particular, personal information necessary for the administration of salary and wage records may be transferred to Namib Mills (Pty) Ltd, located in Namibia, for payroll processing purposes.

Any such transfer of personal information will be conducted in accordance with the requirements of POPIA. We will ensure that the recipient is subject to appropriate safeguards, including binding corporate rules or agreements that provide an adequate level of protection, and that such personal information is afforded the same level of protection as required under POPIA.

8.5. **General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information**

- Armed response units;
- Computer and network security;
- Access controlled offices to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

9. **Request procedure to obtain access to records held by the Private Body**

9.1. To access records held by Namib Mills South Africa (Pty) Ltd, the requester must complete Form 2 (Annexure B) and submit it, along with the required request fee and any applicable deposit (as set out in Annexure A), to the Information Officer using the contact details provided.

9.2. The form must include enough detail to identify -

- 9.2.1 the record;
- 9.2.2 the requester's identity;
- 9.2.3 the preferred method of access, and the reason the information is needed to exercise or protect a specific right
- 9.3. Requests submitted on behalf of another person must be accompanied by proof of authority.
- 9.4. Where the requester is unable to complete the form due to illiteracy or disability, the request may be made orally at the address of Namib Mills South Africa (Pty) Ltd, and assistance will be provided to record the request.
- 9.5. Upon receipt of the request, the Information Officer will notify the requester of any fees due and will only proceed once payment has been received.
- 9.6. If access is granted, additional fees may apply for reproduction or preparation. In cases where access is denied, any deposit paid will be refunded. The requester will be informed of the outcome within 30 days using Form 3 (Annexure C).

10. Availability of the Manual

- 10.1. A copy of the manual is available -
 - 10.1.1 on the website of the Private Body at
[\(https://www.namibmills.com/\)](https://www.namibmills.com/);
 - 10.1.2 At the head office of Namib Mills South Africa (Pty) Ltd for public inspection during normal business hours;
 - 10.1.3 To any person upon request upon the payment of a reasonable prescribed fee; and
 - 10.1.4 To the Information Regulator upon request.
- 10.2. A fee for a copy of the Manual, as contemplated in annexure B of the PAIA Regulations, attached to this PAIA Manual as annexure A, shall be payable per each A4-size photocopy made.

11. Updating of the Manual

The head of Namib Mills South Africa (Pty) Ltd will on a regular basis update this manual.

Issued by: Mr. Carel Johannes Christiaan DeWet Burger (Information Officer)

12. Annexure A: Applicable fees

The table below sets out the fees applicable to any request for a record of information held by Namib Mills South Africa (Pty) Ltd:

ITEM	DESCRIPTION	AMOUNT
1.	The request fee payable by every requester	R 140.00
2.	Photocopy/printed black & white copy of A4-size page	R 2.00 per page or part thereof
3.	Printed copy of A4-size page	R 2.00 per page or part thereof
4.	For a copy of computer-readable form on: (i) Flash drive (to be provided by the requester) (ii) Compact Disk: a. If provided by requester b. If provided to the requester	R 40.00 R 40.00 R 60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
6.	For a copy of visual images	
7.	Transcription of an audio record, per A4-size page	R 24.00
8.	For a copy of audio recording on: (i) Flash drive (to be provided by the requester) (ii) Compact Disk: a. If provided by requester b. If provided to the requester	R 40.00 R 40.00 R 60.00
9.	To search for and prepare the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. Not to exceed a total cost of	R 145.00 R 435.00
10.	Deposit: If search exceeds 6 hours	One third of the amount per request calculated in terms of items 2 to 8.
11.	Postage, email or any other electronic transfer	Actual expense, if any.

13. Annexure B: 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

 (Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

- Request is made in my own name Request is made on behalf of another person

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

Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel.(B)		Facsimile:
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<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>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD (Mark the applicable box with an "X")			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <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	

MANNER OF ACCESS <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	
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	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>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.</i>	
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	

FEES

- 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:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

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

Signature of Information Officer

14. Annexure C: Form 3

OUTCOME OF REQUEST AND 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: The Information Officer

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 A.	
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OR

2. You requested:

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

4. Fees payable with regard to your request:

ITEM	DESCRIPTION	AMOUNT	NUMBER OF PAGES/ITEMS	TOTAL
1.	The request fee payable by every requester	R 140.00		
2.	Photocopy/printed black & white copy of A4-size page	R 2.00 per page or part thereof		
3.	Printed copy of A4-size page	R 2.00 per page or part thereof		
4.	For a copy of computer-readable form on: (i) Flash drive (to be provided by the requestor) (ii) Compact Disk: a. If provided by requester b. If provided to the requester	R 40.00 R 40.00 R 60.00		
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.		
6.	For a copy of visual images			
7.	Transcription of an audio record, per A4-size page	R 24.00		
8.	For a copy of audio recording on: (i) Flash drive (to be provided by the requestor) (ii) Compact Disk: a. If provided by requester b. If provided to the requester	R 40.00 R 40.00 R 60.00		
9.	To search for and prepare the record for disclosure, for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. Not to exceed a total cost of	R 145.00 R 435.00		
10.	Deposit: If search exceeds 6 hours	One third of the amount per request calculated in terms of items 2 to 8.		
11.	Postage, email or any other electronic transfer	Actual expense, if any.		
	TOTAL:			

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

Yes

No

Hours of search		Amount of deposit (<i>calculated on one third of total amount per request</i>)	
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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 No.: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information Officer