



Bryte Insurance Company Limited

PAIA Manual

2024

1. Introduction

1.1 Background and Purpose

The Promotion of Access to Information Act 2 of 2000 ("PAIA") was enacted on 3 January 2000. The purpose of this PAIA Manual is to give effect to the constitutional right of access to any information held by the Bryte and that is required for the exercise or protection of any rights; and to provide for matters connected therewith.

The Act requires all private and public bodies to prepare an Information manual.

In this PAIA manual, any reference to "Bryte" refers to Bryte Insurance Company Limited (Reg. No. 1965/006764/06)

Bryte acknowledges everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements as set out by PAIA and the Protection of Personal Information Act ("POPIA") have been met.

This PAIA manual is compiled in accordance with section 51 of the Act and provides for the following particulars:

Annexure A: Section 10 PAIA Guide

This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to it.

Annexure B: Public Information

Records and information that is automatically available without a person having to request access in terms of PAIA.

Annexure C: Records kept by Bryte in accordance with any other legislation

This section provides a description of the various statutes in terms of which Bryte is required to maintain records.

Annexure D: Categories of data subjects and personal information processed

This section provides a list of records which are not automatically available, but would require a formal request for access to the information (as per Annexure F), subject to Section 63 (1) of PAIA providing that the information officer must refuse a request for access to a record of the body if its disclosure would involve the unreasonable disclosure of perusal of personal information about a third party, including a deceased individual, therefore, inclusion in this list does not imply that the request for the record will be granted.

Annexure E: How to make a request for access to information

This section sets out the procedure required to obtain access to a record as well as the fees payable should the request be approved. The section also provides a link to the Form that is required to be completed in order to request the information.

Annexure F: Prescribed Fees

This section sets out the fees that are payable to the organisation prior to processing a request to obtain access to a record held by the organisation.

1.2 Availability of the manual

Copies of the manual, prescribed forms and fees payable can be obtained from Bryte's head office:

Bryte Insurance Company Limited
Rosebank Towers, 5th Floor, 15 Biermann Avenue, Rosebank, 2196
Telephone: +27 (0) 11 088 7000
Website: <https://www.brytesa.com>

1.3 Guide of the Information Regulator

The information regulator (IR) has compiled a guide on how to use to the Act, to assist people in exercising their rights under the Act. This guide is available from the IR upon request.

Any enquiry regarding this guide should be directed to the IR at:

The Information Regulator
The PAIA Unit (The Research and Documentation Department)
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 / PO Box 31533, Braamfontein, 2017
Telephone: +27 (0) 10 023 5200
Fax: +27 (0) 10 023 5200
Email: PAIACompliance@inforegulator.org.za
Website: [www.https://inforegulator.org.za/](https://inforegulator.org.za/)

1.4 Key contact details for Access to Information of Bryte

Requests to be addressed to:

Head of Legal and Compliance – Information Officer

Name: Wynand Louw
Telephone: +27 (0) 11 088 7000
Email: Compliance@brytesa.com
Physical Address: Rosebank Towers, 5th Floor, 15 Biermann Avenue, Rosebank, 2196
Postal Address: PO Box 61489, Marshalltown, 210

Head of Compliance – Deputy Information Officer

Name: Bonga Kubayi
Telephone: +27 (0) 11 088 7000
Email: Compliance@brytesa.com
Physical Address: Rosebank Towers, 5th Floor, 15 Biermann Avenue, Rosebank, 2196
Postal Address: PO Box 61489, Marshalltown, 210

1.5 Processing details

In terms of POPIA, data must be processed for a specified purpose. The purpose for which data is processed by Bryte will depend on the nature of the data subject's relationship with Bryte. This could be for example for the purpose of providing the data subject with an insurance contract, onboarding of service providers, brokers, contractors. This purpose is disclosed, explicitly or implicitly, at the time the data is collected. Our [privacy statement](#) (Annexure G) highlights why we process your personal information and how we protect it.

1.6 Transborder flows of personal information

Bryte may transfer the personal information of a data subject to another of Bryte's entities, an agent/intermediary, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of the Republic. If this happens, Bryte will ensure that anyone to whom it passes the data subject's personal information agrees to treat the information with the same level of protection as if Bryte were dealing with it. If the data subject does not wish for Bryte to disclose this personal information to third parties, the data subject can contact the Information Officer. Bryte may, however, not be able to provide products or services to the data subject if such disclosure is necessary.

1.7 Security measures

Bryte has implemented appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in its possession and under its control, to prevent any loss of damage to or unauthorised destruction of personal information. The aforesaid measures include, but are not limited, to:

- Robust information security policies and procedures, as well as incident management procedures to minimise the potential adverse consequences of any security compromises.
- Data leakage prevention controls.
- Regular information security training and awareness for all personnel.
- Anti-virus and anti-malware tools.
- Secure IT infrastructure builds.
- Identity and access management policies and controls.

Bryte does not control the confidentiality, access to or dissemination of information which is retrieved through the use of "cookies" or information retrieved through the collecting and storing of IP addresses of visitors to its website.

1.8 Recipients or categories of recipients to whom personal information may be disclosed

Where Bryte discloses personal information, it will do so only where legally permitted or required and will not disclose personal information to recipients who are not lawfully permitted to receive such personal information. Bryte may share personal information as follows and solely for the purposes outlined in its [privacy statement](#) as alluded to above:

- To any other of Bryte's subsidiaries or other third parties.
- To any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime.
- To any regulator or supervisory authority, including those in foreign jurisdictions, if Bryte is required to do so in terms of Applicable Laws.
- To a prospective buyer or seller of any of its businesses or assets.
- To any person if Bryte are under a duty to disclose or share the personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of Bryte, clients or other third parties.
- To intermediaries or any other person acting on behalf of a policyholder or an introducer.

1.9 Right of access

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the organisation to a requester if:

- The record is required for the exercise or protection of any right, and
- The requester complies with the procedural requirements relating to a request for access to that record, and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

1.9.1 Grounds for refusal

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access.

Where any grounds for refusal are found, a request for access will not be granted.

However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk, and
 - the public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question.
- Where there are no grounds for refusal, request for access will be granted.

If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which:

- does not contain, and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed.

The grounds for refusal, or absence thereof, are set out below:

A: Mandatory Protection of privacy of a Third Party who is a Natural Person
Grounds for Refusal
<ul style="list-style-type: none"> • The disclosure would involve the unreasonable disclosure of personal information about a third party that is a natural person (including a deceased individual)
No Grounds for Refusal
<ul style="list-style-type: none"> • The record consists of information that concerns an individual who has already consented in writing to its disclosure to the requester concerned. The record consists of information that is already publicly available • The record consists of information that was given to the organisation by the individual to whom it relates and the individual was informed by or on behalf of the organisation, before it is given, that the information belongs to a class of information that would or might be made available to the public • The record consists of information about an individual's physical or mental health, or well-being, who is under the care of the requester and who is under the age of 18; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interest • The record consists of information about an individual who is deceased, and the requester is the individual's next of kin or making the with the written consent of the individual's next of kin • The record consists of information about an individual who is or was an official of the organisation and which relates to the position or functions of the individual, including, but not limited to the title, work address, work phone number, the classification, salary scale or remuneration and responsibilities of the position held or services performed by the individual and the name of the individual on a record prepare by the individual in the course of employment
B: Mandatory Protection of Commercial Information of a Third Party
Grounds for Refusal
<ul style="list-style-type: none"> • The record consists of information that contains trade secrets of a third party • The record consists of information that contains 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

- The record consists of information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations or to prejudice that third party in commercial competition

No Grounds for Refusal

- The record consists of information about a third party who has consented who has already consented in writing to its disclosure to the requester concerned
- The record consists of information about the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation)

C: Mandatory Protection of certain Confidential Information of a Third Party

Grounds for Refusal

- The record consists of information the disclosure of which would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement

D: Mandatory Protection of Safety of Individuals and Protection of Property

Grounds for Refusal

- The record consists of information that if disclosed could reasonably be expected to endanger the life or physical safety of an individual
- The record consists of information that if disclosed would likely prejudice or impair the security of a building, a structure or system, a computer or communication system, a means of transport, any other property
- The record consists of information that if disclosed would likely prejudice or impair the security of methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public, or the security of property

E: Mandatory Protection of Records privileged from Production in Legal Proceedings

Grounds for Refusal

- The record consists of information privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege

F: Commercial Information of the Organisation

Grounds for Refusal

- The record consists of information that contains trade secrets of the organisation
- The record consists of information that contains financial, commercial, scientific or technical information, other than trade secrets, of the organisation, the disclosure of which would likely cause harm to the commercial or financial interests of the organisation
- The record consists of information, the disclosure of which, could reasonably be expected to put the organisation at a disadvantage in contractual or other negotiations or prejudice the organisation in commercial competition
- The record is a computer program as defined in section 1(1) of the Copyright Act (Act 98 of 1978), owned by the organisation, except insofar as it is required to give access to a record to which access is granted in terms of PAIA

No Grounds for Refusal

- The record consists of information about the results of any product or environmental testing or other investigation supplied by the organisation or the results of any such testing or investigation carried out by or on behalf of the organisation and its disclosure would reveal a serious public safety or environmental risk (the results of any product or environmental testing or other investigation do not include the results of preliminary testing or other investigation conducted for the purpose of developing methods of testing or other investigation)

G: Mandatory Protection of Research Information of a Third Party and the Organisation

Grounds for Refusal

- The record consists of information that contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research to serious disadvantage
- The record consists of information that contains information about research being or to be carried out by or on behalf of the organisation, the disclosure of which would be likely to expose the organisation, a person that is or will be carrying out the research on behalf of the organisation, or the subject matter of the research to serious disadvantage

2. Notice

Where a request for access has been received the Information Officer or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable.

Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any)
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application

Except to the extent that the provisions regarding third party notification may apply, the Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request, and
- Notify the requester of the decision and,
- If the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access. The form in which access will be given, and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application.

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on
- Exclude, from any such reasons, any reference to the content of the records' and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is in the organisation's possession, but cannot be found, or
- Simply does not exist,

The head of the organisation must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

3. Definitions

Organisational term	Meaning
PAIA	<ul style="list-style-type: none"> • Promotion of Access to Information Act 2 of 2000
POPIA	<ul style="list-style-type: none"> • Promotion of Personal Information Act 4 of 2013
Information Regulator	<ul style="list-style-type: none"> • means the Regulator established in terms of Section 39 of POPI
Person	<ul style="list-style-type: none"> • a natural person or a juristic person
Private body means:	<ul style="list-style-type: none"> • a natural person who carries or has carried on any trade, business or profession, but only in such capacity • a partnership which carries or has carried on any trade, business or profession; or • any former or existing juristic person, but excludes a public body
Public body means:	<ul style="list-style-type: none"> • any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or • any other functionary or institution when: • exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or • exercising a public power or performing a public function in terms of any legislation
Head, in relation to, a private body means:	<ul style="list-style-type: none"> • in the case of a natural person, that natural person or any person duly authorised by that natural person; • in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership; • in the case of a juristic person: • the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or • the person who is acting as such or any person duly authorised by such acting person
Head, in relation to, a private body means:	<ul style="list-style-type: none"> • in the case of a natural person, that natural person or any person duly authorised by that natural person; • in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership; • in the case of a juristic person: • the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or • the person who is acting as such or any person duly authorised by such acting person

Organisational term	Meaning
Information Officer	<ul style="list-style-type: none"> The head of a private body or a person authorised by the head of a private body to act on their behalf and appointed to the position of Information Officer for the private body.
Data Subject	<ul style="list-style-type: none"> The person to whom personal information relates
Deputy Information Officer	<ul style="list-style-type: none"> The person to whom any power or duty conferred or imposed on an Information Officer by POPIA has been delegated
Requester in relation to a private body	<ul style="list-style-type: none"> Any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person
Personal Requester	<ul style="list-style-type: none"> A requester seeking access to a record containing personal information about the requester
Personal Information	<ul style="list-style-type: none"> Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: 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; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person; the personal opinions, views or preferences of the person; 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; the views or opinions of another individual about the person; and 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
Processing	<ul style="list-style-type: none"> Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information
Request for access	<ul style="list-style-type: none"> A request for access to a record of the organisation in terms of section 50 of PAIA
Record	<ul style="list-style-type: none"> Any recorded information regardless of the form or medium, in the possession or under the control of the organisation irrespective of whether or not it was created by the organisation
Third Party in relation to a request for access to a record held by the organisation	<ul style="list-style-type: none"> Any person other than the requester

4. Annexures

4.1 Annexure A: Section 10 PAIA Guide

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

The Guide can also be obtained:

- upon request to the Information Officer by completing FORM 1 – REQUEST FOR A COPY OF THE GUIDE from the website of the Regulator.

A copy of the Guide is also available in the following official languages, for public inspection during normal office hours. English/isiZulu/Sesotho.

4.2 Annexure B: Public Information

The following records and information are automatically available without a person having to request access in terms of this Act on the website www.brytesa.com:

Confirmation of license in terms of the Insurance Act and the Financial Advisory and Intermediary Services Act
BBBEE Certificates
Brochures, Trade Circulars and Pamphlets
Insurance Application and Claims Forms

4.3 Annexure C: Records kept by Bryte in accordance with any other legislation

In compliance with other legislation, Bryte allows access to records as prescribed in the applicable legislation and different to the PAIA process. A requester may request information that is available in terms of other legislation and may request access to related information outside this process. This includes the following legislations:

Legislation	Type of information to be retained
Basic Conditions of Employment Act No. 75 of 1997	Records of information containing the personal details of all its employees, working times and remuneration package.
Broad Based Black Economic Empowerment Act No. 53 of 2003 ("BBBEE")	Records of activities undertaken in order to promote economic transformation and meaningful participation of black people in the mainstream economy.
Companies Act No. 71 of 2008	Company documents and records. Memorandum of incorporation and records of their directors.
Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993	Employee record or reproduction of same relating of wages, time worked, payment for piece work and overtime.
Consumer Protection Act No. 68 of 2008	Records of transactions aimed at promoting and protecting the economic interests of consumers.
Criminal Procedure act No. 51 of 1977	The Act makes provision for the admissibility of documents as evidence where such documents were compiled in the

	course of trade or business by persons who have personal knowledge of matters contained in the document.
Electronic Communications and Transactions Act No. 25 of 2002	Records of electronic transactions.
Employment Equity Act No. 55 of 1998	Records relating to the workforce, employment equity plans and other relevant employment related records.
Financial Advisory and Intermediary Services (FAIS) Act, 37 of 2002	Records relating to company reporting and Company related records as far as is allowed in terms of this Act may be requested.
Financial Intelligence and Centre Act No. 38 of 2001	Identification and verification records Client due-diligence records Nature of business relationship/transaction
Financial Sector Regulation Act 9 of 2017	The Act intends to make provision for the licensing of financial institutions and to regulate and supervise financial product providers and financial services providers to improve market conduct in order to protect financial customers. Records relating to company reporting and other company related records as far as is allowed in terms of this Act may be requested.
Income Tax Act, 58 of 1962	Tax related records relating to the taxation of incomes and deductions by the employer of amounts from the remuneration of employees in respect of certain tax liabilities of employees such as IT3, IRP5, IT3, UIF files, PAYE information, SDL information, etc.
Insurance Act 18 of 2017	The Act provides the legal framework for the prudential regulation and supervision of insurance business in the Republic that is consistent with the Constitution of the Republic of South Africa, 1996, and promotes the maintenance of a fair, safe and stable insurance market. Records relating to company reporting and other company related records as far as is allowed in terms of this Act may be requested.
Labour Relations Act No. 66 of 1995	Records of disciplinary transgressions against employees, actions taken and reasons for the action
Long-term Insurance Act, 52 of 1998	The Act provides for the regulation of long-term insurers and for the control of certain activities of long-term insurers and intermediaries. Records relating to company reporting and other company related records as far as is allowed in terms of this Act may be requested.
Occupational Health and Safety Act No. 85 of 1993	Records relating to the health and safety of persons in the workplace
Prevention and Combating of Corrupt Activities Act No. 12 of 2004	Records relating to any offer of improper gratification relating to the procurement or execution of contracts or employment relationship.
Promotion of Access to Information Act, 2 of 2000	The PAIA manual

Promotion of Equality and Prevention of Unfair Discrimination Act, 4 of 2000	Grievance logged and outcome
Protection of Personal Information Act, 4 of 2013	POPIA operating contract Data transfer agreement Privacy Notice/Statement
Short-term Insurance Act, 53 of 1998	The Act provides for the regulation of short-term insurers and for the control of certain activities of short-term insurers and intermediaries. Records relating to company reporting and other company related records as far as is allowed in terms of this Act may be requested.
Skills Development Act no. 97 of 1998	Records of all learnership agreements.
Skills Development Levies Act No. 9 of 1999	Every employer is expected to make payments towards the skills development levy at a rate of 1% of the leviable amount. Records detailing payments made by the Employer are expected to be kept.
Unemployment Insurance Act No. 30 of 1996	Records relating to payment of contributions to the Unemployment Insurance Fund relating to illness, maternity and for dependents.
Value-added Tax Act, 89 of 1991	Taxation records relating to the consumption and supply of goods and services such as invoices, credit notes and debit notes, etc..

The above is not an exhaustive list of statutes that may require Bryte to keep records.

4.4 Annexure D: Categories of data subjects and personal information processed

4.4.1 Personnel Records

Any personal records provided to Bryte by its personnel

Any records a third party has provided to Bryte about any of its personnel

Conditions of employment and other personnel-related contractual and quasi-legal records, i.e.:

- Business continuity plans;
- Human Resource policy documents; Employee information;
- Employment contracts;
- PAYE records;
- UIF records;
- Payroll reports;
- Payslips;
- IRP5s;
- Leave records;
- Disciplinary codes and procedures and records;
- Labour disputes;
- Grievance procedure;
- Performance management records;
- Long service awards;

- Attendance register records;
- Medical aid records;
- Accident books and records;
- Training records;

Workplace and Union agreements and records.

Other internal records and correspondence.

4.4.2 Customer-related records

A customer includes any natural or juristic entity that receives services from Bryte.

Customer-related information includes the following:

- Any records a customer has provided to a third party acting for or on behalf of Bryte.
- Any records a third party has provided to Bryte; and
- Records generated by or within Bryte pertaining to the customer, including transactional records.

4.4.3 Personal Information records

Records that are held by Bryte, relating to the personal information of any natural person or juristic entity.

4.4.4 Bryte - Company records (Private body records)

Published financial records and internal financial records and documents	<ul style="list-style-type: none"> • Investor relations records
Employment Equity reports	<ul style="list-style-type: none"> • Management reports
Operational records	<ul style="list-style-type: none"> • Quality Control records; • Audit summaries and reports; • Statistic reports;
Databases	<ul style="list-style-type: none"> • Information technology; • Software programmes and applications; • Computer generated databases; • System/Hardware documentation and manuals;
Project, disaster recovery and implementation plans	<ul style="list-style-type: none"> • Internet and intranet policy documentation; • Electronic Communications policy documentation; • System security policy documentation; • Licensing; • Statistics on usage;
Marketing records	<ul style="list-style-type: none"> • Internal and external correspondence
Product records	<ul style="list-style-type: none"> • Statutory records
Treasury-related records	<ul style="list-style-type: none"> • Legal & regulatory; • Contracts; • Commercial disputes; • Litigation; • Standard operating procedures and policies; • Legal opinion and reports;

	<ul style="list-style-type: none"> Permits, licenses, consent, approvals, authorisations, applications, registrations and exemptions
Securities and equities	<ul style="list-style-type: none"> Records held by officials of the private body.

4.4.5 Other party records

Bryte may possess records pertaining to other parties (including without limitation) contractors, suppliers, subsidiary/holding/sister companies, joint venture companies and service providers. Alternatively, such other parties may possess records that can be said to belong to Bryte, such as:

- Personnel, customer or private body records which are held by another party as opposed to being held by the company; and
- Records held by Bryte pertaining to other parties (including without limitation)
 - Financial records,
 - Correspondence,
 - Contractual records,
 - Records provided by the other party and
 - Records third parties have provided about the contractors/suppliers

4.5 Annexure E: How to make a request for access to information

To facilitate the processing of your request, kindly complete the Request for Information form ([FORM 2](#)) and submit the form to the e-mail address of the Information Officer.

The Information Officer or Deputy Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable.

Personal requesters will not be charged a request fee.

Once the request has been processed, the Information Officer or Deputy Information Officer will inform you of the outcome of your request and any additional fees that may fall due.

Please be advised that PAIA provides a number of grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected
- where such records are already otherwise publicly available
- instances where public interest are not served
- the mandatory protection of commercial information of a third party
- the mandatory protection of certain confidential information of a third party

When completing the form please:

- indicate the identity of the person seeking access to the information
- provide sufficient particulars to enable the deputy information officer to identify the information requested
- specify the format in which the information is required
- indicate the contact details of the person requiring the information
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed

- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so

A request will be deemed to be received by Bryte when Bryte acknowledges receipt thereof, for the purposes of this clause an auto response shall not be a response by Bryte;

4.6 Annexure F: Prescribed Fees

PAIA sets out two (2) types of fees, namely, a request fee and an access fee, that are required to be paid prior to Bryte processing the request for access to a record.

- A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and
- An access fee, which is paid by all requesters in the event that a request for access is granted. This fee is inclusive of costs involved in obtaining and preparing a record for delivery to the requester.

If the preparation of the record requested requires more than the prescribed hours (six), an additional deposit shall be paid (of not more than one third of the access fee which would be payable if the request was granted).

Bryte reserves the right to waive the fees payable subject to the type and categories of information requested as well as the effort required to provide access to the requested information. The requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request and access fees or deposit if Bryte declines the requester's request to waive the fees.

Payment details can be obtained from the Information Officer and/or Deputy Information Officer. Payment can be made by direct deposit into the nominated Bryte bank account. Proof of payment must be attached to the Access Request Form along with the other required documentation.

If a deposit has been paid in respect of a request for access which is subsequently refused, then the Information Officer or Deputy Information Officer must refund the deposit in full to the requester.

The requester must pay the prescribed fee before any processing, or any further processing, can take place.

The applicable fees which will be payable upfront are:

Fees in respect of Private Bodies		
Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black and white copy of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on: (iii) Flash drive (to be provided by requestor) (iv) Compact disc	R40.00
	• If provided by requestor	R40.00
	• If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsource. Will depend on quotation from service provider
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00

8.	Copy of an audio record on: (iii) Flash drive (to be provided by requestor) (iv) Compact disc <ul style="list-style-type: none"> If provided by requestor If provided to the requestor 	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8
11.	Postage, email, or any other electronic transfer	Actual expense, if any."

4.7 Annexure G: Protection of Personal Information

External Privacy Statement

June 2021

1. Introduction

- 1.1. For purposes of this Statement:
 - 1.1.1. "Applicable Laws" means all laws, regulations that Bryte is required to comply with;
 - 1.1.2. "Client" or "you" means any prospective, new or existing client of Bryte and its subsidiaries; and
 - 1.1.3. "Bryte" or "we" or "us" means Bryte Africa Group and all of its subsidiaries
- 1.2. This Statement sets out how your personal information will be used by Bryte and applies to any information, including personal and special personal information, you give to Bryte or which Bryte may collect from third parties.
- 1.3. It is important that you read this Statement carefully before submitting any personal information to us.
- 1.4. By submitting any personal information to Bryte you provide consent to the processing of your personal information as set out in this Statement.
- 1.5. The provisions of this Statement are subject to mandatory, unalterable provisions of Applicable Laws;
- 1.6. Please do not submit any personal information to Bryte if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, Bryte may not be able to provide its products and services to you.

2. How to contact us

If you have any comments or questions about this Statement, please contact the compliance department compliance@brytesa.com

3. Amendment of this Statement

- 3.1. We may amend this Statement from time to time for any of the following reasons:

- 3.1.1. to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;
 - 3.1.2. to comply with changes to any legal or regulatory requirement;
 - 3.1.3. to ensure that our Statement is clearer and more favourable to you;
 - 3.1.4. to rectify any mistake that may be discovered from time to time; and/or
 - 3.1.5. For any other reason which Bryte, in its sole discretion, may deem reasonable or necessary.
- 3.2. Any such amendment will come into effect and become part of any agreement you have with Bryte when notice is given to you of the change by publication on our website. It is your responsibility to check the website often.

Any such amendment will come into effect and become part of any agreement you have with Bryte when notice is given to you of the change by publication on our website. It is your responsibility to check the website often.

4. Privacy and indemnity

Bryte is committed to ensuring the privacy and integrity of your information. We take your privacy and the protection of your personal information very seriously, and we will only use your personal information in accordance with this Statement and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your personal information yourself (for example, by ensuring that all passwords and access codes are kept secure).

We have implemented reasonable technical and operational measures to keep your personal information secure. Bryte does not control the confidentiality, access to or dissemination of information which is retrieved through the use of "cookies" or information retrieved through the collecting and storing of IP addresses of visitors to this website.

You hereby indemnify and hold Bryte harmless from any loss, damages or injury that you may incur as a result of any unintentional access or acquisition of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information to Bryte.

5. Information which we may collect about you

- 5.1. We may collect the following information about you: not an exhaustive list:
- 5.1.1. your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
 - 5.1.2. records of correspondence or enquiries from you or anyone acting on your behalf;
 - 5.1.3. details of transactions you carry out with us;
 - 5.1.4. details of contracts and sales you carry out with us;
 - 5.1.5. sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints.
- 5.2. Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Statement.

6. How we collect information

- 6.1. You may provide personal information to us either directly or indirectly (through an intermediary acting on our behalf or your behalf, a representative or an introducer), by completing an application for our products and services or requesting further information about our products and services, whether in writing, through our website, over the telephone or any other means.

- 6.2. We may also collect your personal information from your appointed intermediary, any regulator, or other third party that may hold such information.

7. Use of information collected

- 7.1. We may use, transfer and disclose your personal information for the purposes of:
- 7.1.1. providing you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;
 - 7.1.2. managing your policy or relationship and complying with your instructions or requests;
 - 7.1.3. detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
 - 7.1.4. assessing and dealing with complaints and requests;
 - 7.1.5. operational, marketing, auditing, legal and record keeping requirements;
 - 7.1.6. verifying your identity or the identification of your beneficial owner;
 - 7.1.7. transferring or processing your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites;
 - 7.1.8. complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
 - 7.1.9. recording and/or monitoring your telephone calls and electronic communications to/with Bryte in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
 - 7.1.10. conducting market research and providing you with information about Bryte's products or services from time to time via email, telephone or other means (for example, events);
 - 7.1.11. where you have unsubscribed from certain direct marketing communications, ensuring that we do not sent such direct marketing to you again;
 - 7.1.12. disclosing your personal information to third parties for reasons set out in this Statement or where it is not unlawful to do so;
 - 7.1.13. monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from Bryte or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and Bryte; and
 - 7.1.14. Improving or evaluating the effectiveness of Bryte's business or products, services or offerings.
- 7.2. We may from time to time contact you about services, products and offerings available from Bryte or specific subsidiaries which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications by clicking [here](#).

8. Disclosure of your information

Your personal information may be shared with Bryte's subsidiaries, our intermediaries/ representatives and sub-contractors, and selected third parties who process the information on our behalf.

- 8.1. We may also disclose your personal information to third parties in the following circumstances:
- 8.1.1. To any other of Bryte's subsidiaries or other third parties to –
 - 8.1.1.1. assess and monitor any of your applications for Bryte's products or services;
 - 8.1.1.2. determine which products and services may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications

- 8.1.1.3. have a better understanding of your circumstances and needs to provide and improve Bryte's products and services;
- 8.1.2. to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;
- 8.1.3. to any regulator or supervisory authority, including those in foreign jurisdictions, if Bryte is required to do so in terms of Applicable Laws;
- 8.1.4. to a prospective buyer or seller of any of our businesses or assets;
- 8.1.5. to any person if we are under a duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of Bryte, Clients or other third parties; and/or
- 8.1.6. To your /intermediary or any other person acting on your behalf, an or an introducer.
- 8.2. We may transfer your information to another of Bryte's entities, an agent/intermediary, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of the Republic. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.
- 8.3. If you do not wish us to disclose this information to third parties, please contact the Information Officer. We may, however, not be able to provide products or services to you if such disclosure is necessary.

9. Retention of your information

We may retain your personal information, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your information in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

10. Access to, correction and deletion of your personal information

- 10.1. You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2000 ("PAIA"). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by Bryte, please review our PAIA Manual located at [Please insert link to PAIA manual.].
- 10.2. You may request the correction of personal information Bryte holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, Bryte may limit the products and services offered to you or elect not to open the account.
- 10.3. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.
- 10.4. You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

11. Complaints

- 11.1. Should you believe that Bryte has utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with Bryte at NonClaimsComplaints@brytesa.com

- 11.2. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:
Telephone: 010 023 5200
Email: POPIAComplaints@inforegulator.org.za