



AYO TECHNOLOGY SOLUTIONS LIMITED

(hereinafter referred to as “AYO”)

PAIA & POPI MANUAL

Prepared in terms of Section 51 of the requirements of the

PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

(hereinafter referred to as “the PAIA” or “the Act”),

and to further address the requirements of the

PROTECTION OF PERSONAL INFORMATION ACT, 2013

(hereinafter referred to as “the PoPI Act”) and its 2017 Regulations

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1. DEFINITIONS

The following words shall bear the same meaning as under the PAIA as follows:

“Private body” means any former or existing juristic person; but excludes a public body.

“Public body” means-

- (a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- (b) any other functionary or institution when-
 - i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - ii) exercising a public power or performing a public function in terms of any legislation.

“Record” of, or in relation to, a public or private body, means any recorded information-

- a) regardless of form or medium;
- b) in the possession or under the control of that public or private body, respectively; and
- c) whether or not it was created by that public or private body, respectively.

“Requester”, in relation to a private body, means-

- a) 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
- b) or any person acting on behalf of the person contemplated in subparagraph (a).

“Third party”, in relation to a request for access to- a record of a private body, means any person (including, but not limited to, a public body) other than the requester.

The following words shall bear the same meaning as under PoPI as follows:

“Consent” means a voluntary, specific and informed expression of will in terms of which a DS agrees to the processing of PI relating to him or her.

“Data Subject” or **“DS”** means the person to whom personal information relates.

“Minister” means the Minister of Justice and Constitutional Development.

“Personal information” or **“PI”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including:

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
- d) the blood type or any other biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

“Private body” means a natural person who carries or has carried on any trade, business or profession in that capacity, a partnership or juristic person.

“Processing” means any operation or activity or any set of operations, whether by automatic means, concerning personal information, including:

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, as well as blocking, degradation, erasure or destruction of information.

“Public body” means any department or state or administration in the national, provincial or local sphere of government or functionary exercising public power.

“Responsible party” or **“RP”** 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.

“Submit” means submit by—

- a) registered post;
- b) electronic mail;
- c) facsimile;
- or
- d) personal delivery.

2. INTRODUCTION

PAIA gives effect to the constitutional right of access to any information held by either a private or public body, subject to certain limitations, that is required for the exercise or protection of rights.

PoPI affords Data Subjects (“DS”) the right to access, in accordance with the provisions of PAIA, to their Personal Information (“PI”) from any Responsible Party (“RP”).

The Promotion of Access to Information Act, 2000 (the “Act”) gives third parties the right to approach private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the private body or government is obliged to release such information unless the Act expressly states that the records containing such information may or must not be released. This manual informs requestors of procedural and other requirements which a request must meet as prescribed by the Act.

AYO is categorised as a private body and thus undertakes to provide the outline the above in its manual, including any additional information that is deemed appropriate to be a transparent and responsible corporate citizen. It is AYO’s policy to conduct its business in compliance with all legal and regulatory requirements. This manual therefore regulates access to information and of the records owned, and otherwise held or under the control of AYO, and the release of any such information or records of any of AYO’s directors, officers, employees, agents, subsidiaries, associates or anyone acting on its behalf.

3. COMPANY CONTACT DETAILS (SECTION 51(1)(a))

AYO CONTACT DETAILS	
<i>Name of private body</i>	AYO Technology Solutions Limited (AYO)
<i>Registration number</i>	1996/014461/06
<i>Chief Executive Officer</i>	Kevin Hardy
<i>Information Officer</i>	Naahied Gamieldien
<i>Street address</i>	Quay 7, East Pier, Victoria & Alfred Waterfront Cape Town, 8001
<i>Postal address</i>	P O Box 181, Cape Town. 8000
<i>Telephone number</i>	(021) 427 1400
<i>Fax number</i>	(021) 419 0731
<i>Email address</i>	info@ayotsl.com
<i>Website</i>	www.ayotsl.com

4. NATURE OF OUR BUSINESS

AYO is a majority black-owned and black-controlled investment holding company with a diversified investment portfolio. AYO's investments include fishing and brands, technology, biotherapeutics, health and beauty, events and tourism as well strategic investments.

AYO is a leading black economic empowerment company, who creates value for its stakeholders through its innovative and sustainable business model, concise strategy, diverse product portfolio and strategic investments, complimented by an experienced and empowered leadership team focused on stakeholder wealth creation as well as communities. AYO prides itself on excellent leadership, governance and being an efficient, responsible corporate citizen.

5. MANDATORY GUIDE IN TERMS OF SECTION 10 read with SECTION 51(1)(b)

A Guide has been compiled in terms of Section 10 of PAIA by the Human Rights Commission. It contains information required by a person wishing to exercise any right, contemplated by PAIA. Enquiries to be directed to:

The South African Human Rights Commission
PAIA Unit
The Research and Documentation Department
Private Bag X2700, Houghton, 2041.
Email: PAIA@sahrc.org.za
Tel: (011) 877 3600
Fax: (011) 484 7146

6. APPLICABLE LEGISLATION: (SECTION 51(1)(c))

Records available in terms of legislation are as follows:

Basic Conditions of Employment Act 75 of 1997
Broad-based Black Economic Empowerment Act 53 of 2003
Compensation for Occupational Injuries and Disease Act 61 of 1997
Companies Act 71 of 2008
Employment Equity Act 55 of 1998
Financial Intelligence Centre Act 38 of 2001
Financial Markets Act 19 of 2012
Income Tax Act 58 of 1962
Labour Relations Act 66 of 1995
Occupational Health and Safety Act 85 of 1993
Promotion of Access to Information Act 2 of 2000

Protected Disclosures Act 26 of 2000
Skills Development Act 97 of 1998
Skills Development Levy Act 9 of 1999
Securities Transfer Tax Act 25 of 2007
Securities Transfer Tax Administration 26 of 2007
Trade Marks Act 194 of 1993
Unemployment Insurance Act 63 of 2001
Unemployment Insurance Contributions Act 4 of 2002
Value Added Tax Act 89 of 1991

7. SCHEDULE OF RECORDS HELD IN TERMS OF SECTION 51(1)(d)

Section 3 of the PAIA states that the Act applies to a record of a private body, regardless of when it came into existence.

The information is classified and grouped according to records relating to the following subjects and categories. It is recorded that the accessibility of the documents listed herein below, may be subject to the grounds of refusal set out in Chapter 4 of the Act.

7.1 Company Secretarial Records

Documents at incorporation
Memorandum and Articles of Association
Documents lodged at Registrar of Companies subsequent to incorporation
Minutes of meetings
Records relating to the appointment of directors/auditor/secretary/public officer and other officers
Share register and other statutory registers
Share certificates

7.2 Financial Records

Annual Financial Statements
Accounting Records
Banking Records
Bank Statements
Paid Cheques
Electronic banking records
Asset Register
Invoices

7.3 Income Tax Records

PAYE Records

Income Tax Records
Documents issued to employees for income tax purposes
Records of payments made to SARS on behalf of employees
All other statutory compliances:
VAT returns
Regional Services Levy returns
Skills Development Levies
UIF returns
Workmen's Compensation

7.4 Personnel Documents and Records

Employment contracts
Forms and applications
Standard letters and notices
Payroll reports
Pay slips
IRP5's
Medical Aid records
Pension Fund records
Disciplinary Code
Grievance Procedure
Salary records
SETA records
Disciplinary code
Leave records
Training records
Employee benefits arrangements rules and records
Safety, Health and Environment records

7.5 Records relating to Customers and Brokers

Policy applications
Policy schedule
Correspondence
Information regarding policies
Quotes
Medical reports
Acknowledgement of policy documents
Broker contracts

7.6 Movable and Immovable Property

Title deeds

Lease agreements

Sale agreement

8. PERSONS WHO MAY REQUEST INFORMATION OR RECORDS

8.1 The purpose for which Information is required

PAIA provides that a person may only request information if that information is required for the exercise or protection of a right.

Further, section 23 of PoPI provides that a DS may, upon proof of identity, request the RP to confirm, free of charge, all the information it holds about the DS and may request access to such information, including information about the identity of third parties who have or have had access to such information.

PoPI further provides that where the DS is required to pay a fee for services provided to him/her/it the RP:

- Must provide the DS with a written estimate of the payable amount before providing the service; and
- May require that the requester pay a deposit for all or part of the fee.

8.2 Categories of Requesters

The capacity under which a Requester requests a record of documentation/information will determine the category he or she falls in, noting that the Requester category has a bearing on the conditions of access to the information.

Requesters have been classified into four categories:

- A Personal Requester: requests information about himself/herself/itself.
- A Representative Requester: requests information relating to and on behalf of someone else.
- A Third-Party Requester: requests information about another person.
- A Public Body: requests information in the public interest.

9. REQUEST PROCEDURE – SECTION 51(e)

The requester must complete Form C (appended to this Manual) and submit this form together with a request fee as per the table at section 12 below, to the Information Officer of AYO.

The form must be submitted to the Information Officer of AYO at her address, fax number, or electronic mail address.

The form must:

- provide sufficient particulars to enable the Head of AYO to identify the record/s requested and to identify the requester;
- indicate which form of access is required;
- specify a postal address or fax number of the requester in the Republic;
- identify the right that the requester is seeking to exercise or protect, and provide an explanation of why the requested record is required for the exercise or protection of that right;
- if in addition to a written reply, the requester wishes to be informed of the decision on the request in any other manner, to state that manner and the necessary to be informed in the other manner; and
- if the request is made on behalf of another person, to submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Head of AYO.

The Information Officer of AYO may refuse a request for access to a record if its disclosure would involve the unreasonable disclosure of personal information about a third party, including a deceased individual.

Furthermore, the Information Officer of AYO may refuse a request for access to a record of the company if the record contains trade secrets, financial, commercial, scientific and technical information, the disclosure of which could harm the interests of AYO.

Similarly, the above refusal grounds apply in respect of the commercial information of third parties held by AYO. Access to such records will require the written permission of the third party concerned before the company will permit access to the specified records.

In accordance with the above mandatory refusal grounds, the Information Officer will decide whether to accede to a request for access to information.

Any search, reproduction, and document preparation necessitated by requests for information will be undertaken in accordance with the prescribed fees.

10. DECISION ON REQUEST AND NOTICE THEREOF – SECTION 56

The Head of AYO or his designated Information Officer to whom the request is made must, as soon as reasonably possible, and within 30 days, after the request has been received decide in accordance with the Act whether to grant the request; and notify the requester of the decision.

11. GRANTING OR REFUSAL OF REQUESTS

All requests which comply with the requirements of the PAIA and PoPI Acts will be processed and considered timeously once the prescribed fees have been provided.

If the request for access is granted, then AYO will advise the Requester on the following:

- the prescribed fee for accessing the information or documentation;
- payable deposit fee and balance outstanding
- the form in which access will be given; and
- the right to lodge an internal appeal against the access fee to be paid or the form of access to be granted.

AYO will give the Requester a written notice of the decision within 30 days after the decision is made. In case of a request being refused, the notification will include the reasons for the refusal.

12. EXTENSION OF PERIOD TO DEAL WITH A REQUEST – SECTION 57

In terms of Section 57, the Information Officer to whom a request for access has been made or transferred, may extend the original 30-day period in which to provide the record if:

- The request is for a large number of records or requires a search through a large number of records would unreasonable interfere with the activities of AYO;
- The records requested are held at an off-site location where the record cannot reasonably be completed within the original period; and
- Consultations with the Board of Directors of AYO is necessary or desirable to decide upon the request that cannot reasonable be completed within the original period.

AYO, through its Information Officer, must deliver a notice to the requester to notify the requester of the extension, stating the period for the extension, adequate reasons for the extension and that the requester may lodge an appeal against the extension, if it so deemed necessary by the requester.

13. DEEMED REFUSAL OF A REQEUST – SECTION 58

Section 58 requires that where the Information Officer of AYO fails to give the decision on a request for access to the requester within the original or extended period, the request must be regarded as having been refused.

14. SEVERABILITY – SECTION 59

Section 59 of the Act states that where a request for access is made to a record containing information which may or must be refused on any of the grounds under Chapter 4, every part of the record which does not contain and can reasonably be severed from any part that contains any such information must be disclosed.

15. GROUND FOR REFUSAL OF ACCESS TO RECORDS- SECTION 62 - 70

If the request for access is refused, then AYO will advise the Requester about the reasons for refusal of access and may advise the Requester to lodge an application with the court against the refusal of the request after the Requester has exhausted all the internal appeal processes. Chapter 4 of the PAIA Act, sections 62 to 70, stipulate the following grounds for refusing requests for information:

- protection of the privacy of a third party who is a natural person;
- protection of commercial information of a third party;
- protection of certain confidential information of a third party;
- protection of safety of individuals and protection of property;
- protection of records privileged from production in legal proceedings;
- commercial information of AYO; and
- protection of research information of a third party and of AYO.

These grounds of refusal are also endorsed under PoPI.

15.1 MANDATORY PROTECTION OF PRIVACY OF THIRD PARTY WHO IS A NATURAL PERSON – SECTION 63

Section 63 of the Act states that a Head of a private body or his designated Information Officer must refuse a request for access to a record of the body of its disclosure would involve the unreasonable disclosure of personal information about a third party, including a deceased individual.

The record may not be refused where

- the natural person has consented to the disclosure or the record;
- the record is already publicly available;
- the record was given to the Head of AYO by the individual to whom it relates, and the individual was informed by or on behalf of AYO, that the information belongs to a class of information that would or might be available to the public;
- the record is about the mental or physical health, or well-being, who is under care of the requester, and where giving access would be in the individual's best interests;
- the record is about an individual who is deceased, and the requester is the individual's next of kin or the request is made with the written consent of the deceased individuals next of kin; or
- the individual is or was an official of AYO and relates to the position of functions of the individual.

15.2 MANDATORY PROTECTION OF COMMERCIAL INFORMATION OF THIRD PARTY – SECTION 64

The Head of AYO or his designated Information Officer may refuse a request a request for access to a record if the record contains:

- trade secrets of a third party;
- financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of the third party; or
- 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.

A record may not be refused insofar as it consists of information about a third party who has consented in terms of section 72 or otherwise in writing to its disclosure to the requester concerned; or 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.

15.3 MANDATORY PROTECTION OF CONFIDENTIAL INFORMATION OF THIRD PARTY – SECTION 65

Whilst AYO will make every reasonable effort to assist a requester to access to a record, a record must be refused where disclosure of the record will constitute a breach of a duty of confidence owed to a third party in terms of an agreement, as per section 65 of the Act.

15.4 MANDATORY PROTECTION OF SAFETY OF INDIVIDUALS AND PROTECTION OF PROPERTY – SECTION 66

The Head of a private body must refuse a request for access to a record of the body if its disclosure could reasonably be expected to endanger the life or physical safety of an individual; or may refuse a request for access to a record of the body if its disclosure would be likely to prejudice or impair the security of any buildings, structures or computer and communication system, a means of transport or any other property.

15.5 MANDATORY PROTECTION OF RECORDS PRIVILEGED FROM PRODUCTION IN LEGAL PROCEEDINGS – SECTION 67

The Head of a private body must refuse a request for access to a record of the body if the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege, as per the requirements of section 67.

15.6 COMMERCIAL INFORMATION OF PRIVATE BODY – SECTION 68

The Head of AYO or his designated Information Officer may refuse a request for access to a record if the record contains:

- trade secrets of AYO;
- financial, commercial, scientific or technical information, other than trade secrets of AYO and the disclosure of which would be likely to cause harm to the commercial or financial interests of the body;
- contains information, the disclosure of which could reasonably be expected to put AYO at a disadvantage in contractual or other negotiations; or to prejudice AYO in commercial competition; or
- a computer programme and is owned by AYO.

A record may not be refused insofar as it consists of information about the results of any product or environmental testing or other investigation supplied by AYO or the results of any such testing or investigation carried out by or on behalf of AYO and its disclosure would reveal a serious public safety or environmental risk.

15.7 MANDATORY PROTECTION OF RESEARCH INFORMATION OF THIRD PARTY, AND PROTECTION OF RESEARCH INFORMATION OF PRIVATE BODY – SECTION 69

The Head of a private body must refuse a request for access to a record of the body if the record 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-

- a) the third party;
- b) a person that is or will be carrying out the research on behalf of the third party; or
- c) the subject matter of the research, to serious disadvantage.

Similarly, AYO may refuse the request on the above grounds where a serious disadvantage may follow the private body.

15.8 MANDATORY DISCLOSURE IN PUBLIC INTEREST – SECTION 70

The Head of AYO must grant a request for access to records that are:

- Commercial information of a third party;
- Certain confidential information of a third party;
- The safety of individuals and the protection of property;
- Records privileged from production in legal proceedings;
- Commercial information of private body and of a third party; or
- Information of third party and protection of research information of private body.

This must be done if the disclosure of the record in the categories above would reveal evidence of a substantial contravention of or failure to comply with the law or there is an imminent and serious public safety or environmental risk and the public interest clearly outweighs the harm contemplated in the provisions above in question.

16. PRESERVATION OF RECORDS UNTIL FINAL DECISION IS MADE

Where the Information Officer of AYO receives a request for access to a record, we will take those steps which are reasonably necessary to preserve the record, without deleting any information contained in it, until the requester has been notified of the decision regarding the request.

17. RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST – SECTION 55

Section 55 of the Act states that where all reasonable steps have been taken to find a record requested and there are reasonable grounds to believe that the record is in AYO's possession but cannot be found or does not exist, the Information Officer will, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to that record.

The affidavit or affirmation must give a full account of all the reasonable steps taken to find the record or to determine if the record exists. The affidavit will then be deemed to be a refusal to the request to access of the said record.

Where the record is later found, after the notice of refusal has been given, the requester must be notified and provided to the record, unless access must again be refused on a ground of refusal contained in Chapter 4 of PAIA.

18. MANNER OF OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

Section 2(1) and (2) of the latest PoPI regulations of 2017 have recently amended section 23 of the PoPI Act to indicate that a DS may object in writing to the processing of PI, by submitting the objection on Form 1 (attached in this manual) to the RP.

The RP, or a person designated for that purpose by the RP, must then proceed to assist the DS to the best of his or her ability with the completion of Form 1.

19. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION

Section 24 of the PoPI Act states that a DS may request a RP, on the prescribed form, to correct or delete any information about the DS that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or that which was obtained unlawfully. Further, the RP must delete or destroy the information of a DS which it is no longer authorized to retain.

Section 3(1) of the latest PoPI regulations of 2017 indicate that a DS must object on Form 2 (attached in this manual) to the RP.

The RP, or a person designated for that purpose by the RP, must then proceed to assist the DS to the best of his or her ability with the completion of Form 1.

20. APPEAL/ LODGMET OF COMPLAINTS PROCEDURE

The Act makes provision for the lodgement of complaint against:

- Access fee charged, or the form of access granted;
- Refusal of the request to grant access;
- Decision to extend the 30 days' period for granting the requested access; or
- Form in which access is granted.

A Requester aggrieved by AYO's decision or who wishes to lodge a complaint or appeal must follow this process:

A compliant or an internal appeal must:

- be lodged within 30 days after the decision is communicated to the Requester;
- be delivered or sent to the address, fax or electronic mail address contained in section 3 above;
- identify the subject of the complaint or internal appeal and state the reasons for the complaint or internal appeal;
- be accompanied by the prescribed appeal fee as prescribed; and
- specify a postal address, fax number or electronic mail for the return of the decision.

Where, in addition to a written reply, the complainant/appellant wishes to be informed of the decision in any other manner he/she/it must state that manner and provide the necessary particulars to be so informed.

The complainant/appellant who is not happy with the decision of the internal process may lodge an application with a court against the decision made within 30 days after the decision was communicated to him/her/it. Where the compliant or internal appeal is lodged after the expiry of the 30 days period the information Officer may, on good cause shown, allow the late lodgement of the compliant or internal appeal.

21. FEES IN RESPECT OF PRIVATE BODIES

Section 54 of the Act entitles a private body to levy a prescribed request fee to a Requester before further processing the request. The fees that may be charged have been published by the Minister of Justice and Constitutional Development and are displayed below.

According to PoPI a RP is entitled to levy a prescribed fee for the provision of PI about the DS in its possession.

FEE	R
The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.	
The fees for reproduction referred to in regulation 11(1) are as follows:	
(a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine- readable form	0,75
(c) For a copy in a computer-readable form on –	
(i) memory stick	89.00
(ii) compact disc	70.00
(d) For a transcription of visual images	
(i) For an A4-size page or part thereof	40.00
(ii) For a copy of visual images	60.00
(e) For a transcription of an audio record	
(i) For an A4-size page or part thereof	20.00
(ii) For a copy of an audio record	30.00
The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2)	50,00
The access fees payable by a requester referred to in regulation 11(3) are as follows:	
(1) (a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c) For a copy in a computer-readable form on -	
(i) memory stick	89,00
(ii) compact disc	
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00
(f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	
(2) For purposes of section 54(2) of the Act, the following applies	
(a) Six hours as the hours to be exceeded before a deposit is payable; and	
(b) one third of the access fee is payable as a deposit by the requester.	
(3) The actual postage is payable when a copy of a record must be posted to a requester.	

22. ADDITIONAL INFORMATION IN TERMS OF SECTION 51(1)(f)

Section 51(1)(f) of the PAIA grants the Minister powers to publish a notice prescribing any other information that companies will have to disclose.

23. OTHER CONSIDERATIONS

23.1. KING IV REPORT ON CORPORATE GOVERNANCE

It is AYO's policy to conduct its business in compliance with all legal and regulatory requirements and as such we govern our business based on sound corporate governance principles. The King IV Report requires that all governing bodies must ensure that their organisation's protect the privacy of personal information, as an integral part of the company's information technology governance.

23.2. JSE LISTINGS REQUIREMENTS

As a listed company, AYO adheres to the JSE Listings Requirements.

24. THE LATEST NOTICE IN TERMS OF SECTION 52(2) (IF ANY)

At this stage, no notice(s) has/have been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

25. MANUAL AVAILABILITY

In addition to the availability of this Manual at the South African Human Rights Commission, this Manual is also available from the Information Officer of AYO, by means of the different forms of request as detailed above.

Furthermore, as per the requirements of Section 4(e) of the Draft regulations, 2017; this manual is available as follows:

- i) On the AYO website, at www.ayotsl.com
- ii) At the AYO officer and is available for inspection during normal business hours, free of charge.

Date approved: August 2018

Approved by: The Board of Directors