

BISSET BOEHMKE MCBLAIN

Attorneys, Notaries & Conveyancers

(the "firm")

MANUAL

in terms of section 51 of

The Promotion of Access to Information Act

2 of 2000 (as amended)

("PAIA")

read with

The Protection of Personal Information Act

4 of 2013 (as amended)

("POPIA")

THE PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000 (AS AMENDED)

The purpose of PAIA is to give effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights. PAIA was enacted in order to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information and in order to actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights.

PAIA applies to records of a private body, which records are defined in section 1 of PAIA as any recorded information, regardless of form or medium, in the possession or under the control of the private body and whether or not it was created by that private body.

Our firm is a private body as defined in section 1 of PAIA.

In terms of section 50 of PAIA, a requester must be given access to any record of the private body if that record is required for the exercise or protection of any rights, the requester complies with the requirements relating to a request for access to the record and access to the record is not refused on any ground(s) contemplated in chapter 4 of PAIA (sections 62-70), namely:

- Mandatory protection of privacy of a third party who is a natural person;
- Mandatory protection of commercial information of a third party;
- Mandatory protection of certain confidential information of a third party;
- Mandatory protection of safety of individuals and protection of property;
- Mandatory protection of records privileged from production in legal proceedings;
- Commercial information of a private body;
- Mandatory protection of research information of a third party, and protection of research information of private body;
- Mandatory disclosure in public interest.

BISSET BOEHMKE MCBLAIN

Our firm conducts business as a partnership of attorneys, notaries and conveyancers.

CONTACT DETAILS - SECTION 51(1)(a)(i) AND (ii) OF PAIA

Name of Firm:	Bisset Boehmke McBlain
Street Address:	4th Floor, 45 Buitengracht Street, Cape Town,
	8001
Postal Address:	P O Box 76, Cape Town, 8000
Managing Partner / Information Officer	Mr Clint van Aswegen
Contact Person:	Mr Clint van Aswegen
Tel Number:	+27 (0)21 441 9800
Email Address:	compliance@bissets.com
Website Address:	www.bissets.com

THE SECTION 10 GUIDE ON HOW TO USE PAIA COMPILED BY THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION AND UPDATED BY THE INFORMATION REGULATOR -SECTION 51(1)(b)(i) OF PAIA

The South African Human Rights Commission has compiled a Guide in terms of section 10 of PAIA, which as of 1 July 2021 shall be updated and published by the Information Regulator at intervals of not more than two years. The Guide is available from the offices of the Information Regulator and any queries or complaints can be directed to:

The Information Regulator

Physical Address: Woodmead North Office Park,54 Maxwell Drive, Woodmead,

Johannesburg, 2191Postal Address: P O Box 31533, Braamfontein, Johannesburg, 2001

Telephone:

+27 10 023 5200

Fax:

086 5003 351

Website:

https://www.justice.gov.za/inforeg

E-mail (enquiries):

inforeg@justice.gov.za

E-mail (complaints): PAIAComplaints@inforegulator.org.za

NOTICE - SECTION 51(1)(b)(ii) READ WITH SECTION 52(2) OF PAIA

The publishing of notices in terms of section 52(2) of PAIA, dealing with the categories of records of the body which are available without a person having to request access in terms of PAIA has been repealed by section 110 of POPIA.

All records of our firm which are automatically available and accessible to any person are contained on our firm's website (<u>www.bissets.com</u>).

RECORDS HELD BY OUR FIRM

Departmental records	Subject				
Human resources records	Past and current staff records				
	Employment contracts				
	 Staff policies and procedures 				
	Health and safety records				
	 Salary and wage records 				
	Disciplinary records				
Firm records	Records of past and current partners				
	 Audited financial statements 				
	Tax and levy records				
	 Investment accounts 				
	Management accounts				
	 Contracts with suppliers 				
	 Trust and business account 				
	information				
	 Fidelity fund certificates 				
	 Budgets 				
	 Correspondence, e-mails, backups 				
	Bank statements				
	 Internal policies 				
Client records	Client files and records				

Practice promotion	Practice promotion strategies
	Client database
	Media releases
	Brochures and seminar information
Records required to be held by our firm in	Attorneys Act 53 of 1979
terms of other legislation (section 51(1)(b)(iii)	Income Tax Act 58 of 1962
of PAIA) – all Acts to be read in conjunction	Value-Added Tax Act No 59 of 1991
with the respective Regulations thereto	 Unemployment Insurance Act 30 of 1966
	Basic Conditions of Employment Act 75 of 1997
	Broad-Based Black Economic Empowerment Act 53 of 2003
	 Employment Equity Act 55 of 1998
	Compensation for Occupational
	Injuries and Diseases Act 130 of 1993
	 Skills Development Levies Act 9 of 1999
	Skills Development Act 97 of 1998
	 Promotion of Access to Information Act 2 of 2002
	 Administration of Estates Act 66 of 1965
	Credit Agreements Act 75 of 1980
	Insurance Act 27 of 1943
	Post Office Act 44 of 1958
	 Usury Act 73 of 1968
	Legal Practice Act 28 of 2014
	Protection of Personal Information Act
	4 of 2013
	Electronic Communications and
	Transactions Act 25 of 2002

Financial Intelligence Centre Act 38 of 2001
Labour Relations Act 66 of 1995
Occupational Health and Safety Act 85
of 1993
Pension Funds Act 24 of 1956

APPLICATION OF POPIA - SECTION 51(1)(c) OF PAIA

In terms of POPIA, our firm is a Responsible Party who determines the purpose of and means for processing of personal information of data subjects as defined in section 1 of POPIA. Whereas our firm's obligations under POPIA are addressed in our Privacy Policy (available on our website www.bissets.com), under PAIA we are required to deal with certain aspects of data processing in this Manual.

PURPOSE OF PROCESSING - SECTION 51(1)(c)(i) OF PAIA

In order to interact with data subjects, to fulfil contractual obligations, to provide assistance, to comply with all legal obligations imposed on us and/or in instances in which our firm pursues a legitimate interest, it is necessary for our firm to process personal information.

Our firm may process personal information of data subjects for various reasons, including, but not limited to, the following:

- to address enquiries and to follow up on leads on prospective clients;
- to provide legal services to clients;
- to give effect to mandates from clients;
- to give effect to contracts with third parties/operators;
- · to give effect to employment contracts with our staff;
- to give effect to and manage our relationships with suppliers;
- · for purposes of recruitment;
- to obtain or provide quotations;

- in the administration of our website and social media platforms (Facebook, LinkedIn, WhatsApp);
- to maintain employment records, to comply with labour, tax, pension fund and other applicable legislation and to give effect to employment agreements;
- to comply with applicable overarching legislation (such as the Financial Intelligence Centre Act).

Any objection to the processing of personal information by our firm in terms of section 11(3) of POPIA should be made in the prescribed form as set out in annexure "A" hereto and submitted to our Information Officer by hand or e-mail.

Any request for the correction or deletion of personal information or for the destruction or deletion of a record of personal information in terms of section 24(1) of POPIA should be made in the prescribed form as set out in annexure "B" hereto and submitted to our Information Officer by hand or e-mail.

CATEGORIES OF DATA SUBJECTS - SECTION 51(1)(c)(ii) OF PAIA

It is anticipated that our firm may process the following types of data of the various categories of data subjects listed below.

Category of Data Subjects	Information Processed
Individuals (clients, potential clients, other)	Name, surname, Identity Number or passport
	number, date of birth, age, marital status,
	citizenship, telephone numbers, e-mail
	address, physical and postal addresses,
	income tax number, financial information,
	banking information (including account
	numbers), FICA documentation, CCTV
	footage, etc.
Juristic persons (clients, potential clients,	Entity name, registration number,
other)	director/member/accountant/auditor/liquidator
	details, tax-related information, contact details

	for representatives, banking information (including account numbers), FICA documentation, VAT registration details, etc.
Partners and employees of the firm	Name, surname, Identity Number or passport number, contact details, physical and postal address, date of birth, age, marital status, race, disability information, employment history, criminal background checks, CV, education history, banking details, income tax reference number, remuneration and benefit information, pension fund information, health information, details related to performance, disciplinary procedure information, CCTV footage, etc.
Third party operators and suppliers	Company registration details, Identity Numbers / passport numbers, BBBEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, Fidelity Fund certificates, addresses, contact details, CCTV footage, etc.
Potential employees/jobseekers	Name, surname, Identity Number or passport number, contact details, physical and postal address, date of birth, age, marital status, race, disability information, employment history, criminal background checks, CV, education history, CCTV footage, etc.

RECIPIENTS/CATEGORIES OF RECIPIENTS - SECTION 51(1)(c)(iii) OF PAIA

In the course and scope of our interactions or relationships with various parties/persons (data subjects) personal information may be transferred to and stored by third parties and/or operators, who may be local or foreign.

Where the personal information of a data subject is entrusted to a third party (operator) by our firm we are required under POPIA to enter into a written agreement with the operator to ensure that adequate security measures are established and maintained by the operator in relation to the integrity and confidentiality of the data subject's personal information.

PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION – SECTION 51(1)(c)(iv) OF PAIA

Where personal information is transferred to or stored by a third party and/or operator in a foreign country by our firm we undertake to do all that is reasonably possible to ensure that the level of protection afforded to the personal information shall be at least that provided by us within the prescripts of any data protection laws (including POPIA) applicable in the Republic of South Africa.

SECURITY SAFEGUARDS - SECTION 51(1)(c)(v) OF PAIA

Our firm secures the integrity and confidentiality of personal information in our possession or under our control by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information. Our firm takes all reasonable measures to ensure that personal information is processed securely, including but not limited to:

- restricting physical and digital access to personal information to those authorised to be in possession thereof;
- entering into written agreements with third parties/operators to whom personal information is entrusted by us to ensure that it receives adequate protection;
- installing anti-virus and anti-ransomware software on its servers, desktops and laptops, which
 are password protected, and ensuring that all software is updated on a daily basis; and

 ensuring that we regularly revise our security strategies and safeguards to prevent unauthorised access to personal information.

REQUESTING ACCESS TO A RECORD – SECTION 53 OF PAIA

A request for access to a record must be made in the prescribed form as set out in annexure "C" hereto. All requests are to be addressed to our firm's Information Officer and delivered to our physical address or transmitted by fax or e-mail.

FEES PAYABLE - SECTION 54 OF PAIA

A data subject has the right to request our firm to confirm, without charge, if our firm holds personal information about the data subject as prescribed in terms of POPIA.

All requests for access to records are subject to the following prescribed fees:

- a request fee, being an administrative fee payable prior to the processing of a request;
 and
- an access fee, being a fee relating to the costs of reproduction of the record, payable prior to the reproduction of the record.

Should the search for and preparation of a requested record, in the opinion of our firm, require more than the hours prescribed for this purpose in terms of the Regulations to PAIA then payment of a deposit may be requested by us. This deposit shall not exceed one third of the access fee which will be payable if the request is granted. The requester may approach the Information Regulator or the court, where applicable, should the need for payment of a deposit be disputed.

A requester whose request for access to a record has been granted must pay an access fee for the reproduction of, search for and preparation of the record and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure, including making arrangements to make it available in the requested form.

A schedule of the prescribed request and access fees as at date of preparation of this Manual is annexed hereto marked annexure "D".

APPLICABLE TIME PERIODS FOR REQUESTS – SECTIONS 56(1) AND 57(1) OF PAIA

As soon as reasonably possible, but not longer than 30 (thirty) days after a request for a record has been received by us, our firm shall provide the requester with its decision on whether or not to grant such request.

The aforesaid period of 30 (thirty) days may be extended by a further period not exceeding 30 (thirty) days as provided for in terms of section 57(1) of PAIA.

DECISION ON REQUEST - SECTIONS 56(2) TO (3) AND 58 OF PAIA

If a request for access to a record is granted our firm shall provide the requester with written notice of the access fee payable and the form in which access will be provided.

If a request for access to a record is denied our firm shall provide written reasons for refusal, which shall exclude reference to the content of the record.

Should our firm fail to provide a requester with a decision within the time periods stipulated in PAIA a request should be regarded as having been refused.

Any written notice provided by our firm in response to a request shall set out the procedure to be followed by the requester to lodge a complaint to the Information Regulator or make application to court based on the outcome of our decision.

GROUNDS FOR REFUSAL OF ACCESS TO RECORDS - SECTIONS 62 TO 70 OF PAIA

As stated above, our firm may refuse access to records on the grounds listed in chapter 4 of PAIA.

However, despite the provisions of chapter 4, our firm must grant a request for access to a record held by us if 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 safety or environmental risk and

the public interest in the disclosure of the record clearly outweighs the harm contemplated by the

ground(s) for refusal.

GRIEVANCE PROCEDURE TO BE FOLLOWED BY REQUESTER – SECTIONS 77A AND 78

OF PAIA

A requester or any other interested party aggrieved by a decision relating to the refusal of a

request for access, the fee payable, the extension of the period to deal with a request or the form

of access may, where permissible, submit a complaint to the Information Regulator. This

complaint should be submitted within 180 (one hundred and eighty) days of our firm's decision.

A requester or other interested party may, after exhausting the complaints procedure laid out in

77A of PAIA and who is aggrieved by any decision made by our firm or the Information Regulator

may, within 180 (one hundred and eighty) days, apply to court for appropriate relief as provided

for in terms of section 82 of PAIA.

AVAILABILITY AND UPDATING OF THIS MANUAL - SECTION 51(2) TO (3) OF PAIA

The Information Officer shall ensure that this Manual is updated on a regular basis.

This Manual shall be made available on our website (www.bissets.com), at our physical offices

during normal business hours or to any person upon the payment of a reasonable amount for a

physical copy thereof. This Manual shall also be made available to the Information Regulator

upon request.

Signed at Cape Town on this 21st day of JULY 2025.

C R VAN ASWEGEN

(Information Officer)

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FORM 1

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

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 2(1)]

Note:

- 1. Affidavits or other documentary evidence in support of the objection must be attached.
- 2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number....

A	DETAILS OF DATA SUBJECT
Name and surname of data subject:	
Residential, postal or business address:	
Contact counts (A)	Code (
Contact number(s):	
Fax number:	
E-mail address:	
В	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party(if the responsible party is a natural):	
Residential, postal or business address:	
Contact number(s):	Code ()
Fax number:	
E-mail address:	

Name of public or private body(if the responsible party is not a natural person):		
Business address:		
Contact number(s):	Code ()
Fax number:		
E-mail address:		
Signed at	this day of20	
Signature of data subject (applica		

FORM 2

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

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017 [Regulation 3(2)]

 Affidavits or other documentary evidence in support of the request must be attached. If the space provided for in this Form is inadequate, submit information as an Annexure to a Form and sign each page. 					
Mark the a Request for	propriate box with an "x".				
Coi	ection or deletion of the personal information about the data subject which is in ession or under the control of the responsible party.				
in b	roying or deletion of a record of personal information about the data subject which is ssession or under the control of the responsible party and who is no longerauthorised ain the record of information.				
Surname:	DETAILS OF THE DATA SUBJECT				
Full names:					
Identity number					
Residential, po- business addre					
Contact numbe					
Fax number:					
E-mail address:					
В	DETAILS OF RESPONSIBLE PARTY				
Name and surn responsible part responsible party natural person):	me of (if the				
Residential, pos business addres					
Contact number	Code ()				
Fax number:					
E-mail address:					

private respons	of public or body (if the sible party is not a person):	·
Busine	ess address:	
Contac	et number(s):	Code ()
Fax nui		
	address:	
0	REASONS FOR *CORRECTION OR DELETION OF 1 DATA SUBJECT/*DESTRUCTION OR DELETION OF 1 ABOUT THE DATA SUBJECT WHICH IS IN POSSES RESPONSIBLE PARTY. (Please provide	F A RECORD OF PERSONAL INFORMATION
*	Delete whichever is not applicable	
Sign	ed at this	. day of20
Signa	ature of Data subject	

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

Proof of identity must be attached by the requester.
 If requests made on behalf of another person, proof of such authorisation, must be attached to this

TO: The Information	on Officer				
(Addre	200)				
E-mail address:	788)				
	11				
Fax number:					
Mark with an "X"					
Request is ma	de in my own	name	Requi	est is made o	on behalf of another person.
		PERSONAL	INFORMATI	ON	
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	44.67	
urat is known to you, to	of the record to whic enable the record to	of RECORD REQUESTED h access is requested, including the reference number be located. (If the provided space is inadequate, place is inadequate, place) this form. All additional pages must be signed.)	ber il ease
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
		E OF RECORD olicable box with an "X")	
Record is in written or pri	nted form		- 6
Record comprises virtua computer-generated imag	al images (this inclu ges, sketches, etc)	des photographs, slides, video recordings,	
Record consists of record	ed words or information	on which can be reproduced in sound	-
Record is held on a comp	uter or in an electronic	c, or machine-readable form	

	FORM OF ACCESS (Mark the applicable box with an "X")				
Printed copy of record (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 soundtra	ck (written or printed document)				
Copy of record on flash d	lrive (including virtual images and soundtracks)				
Copy of record on compa	nct disc drive(including virtual images and soundtracks)				
Copy of record saved on	cloud storage server				
	MANNER OF ACCESS				
	(Mark the applicable box with an "X")				
to recorded words, intorr	cord at registered address of public/private body (including listening mation which can be reproduced in sound, or information held on nic or machine-readable form)				
Postal services to postal a	address				
Postal services to street a	ddress				
Courier service to street a	ddress				
Facsimile of information in	written or printed format (including transcriptions)				
E-mail of information (inclu	uding soundtracks if possible)				
Cloud share/file transfer					
Preferred language (Note that if the record is the language in which the	not available in the language you prefer, access may be granted in record is available)				
PARTIC	ULARS OF RIGHT TO BE EXERCISED OR PROTECTED				
If the provided space is ina	adequate, please continue on a separate page and attach it to this For requester must sign all the additional pages.	rm. The			
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 warment for the late	11.		
d) If you qualify for exem	the amount of the cess to a record o quired to search t	access fee to be plepends on the for for and prepare a p	paid. The in which access is required and
Reason			
You will be notified in writing woosts relating to your request, if a	any. Please indica	ate your preferred	roved or denied and if approved the manner of correspondence:
Postal address	Facsimile		(Please specify)
Signed at	this	day of	20
Signature of Requester / pers	on on whose be	half request is m	
		PFICIAL USE	
Reference number:			
Request received by: (State Rank, Name And Surname of Information Officer) Date received:			
Access fees:			
Deposit (if any):			
Signature of Information Offic	er		

FORM 3 OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]
Note:
1. If your request is granted the—
(a) amount of the deposit, (if any), is payable before your request is processed; and
(b) requested record/portion of the record will only be released once proof of full payment is
2. Please use the reference number hereunder in all future correspondence.
Reference number:
TO:
Your request dated, refers.
1 Van removated
listening to recorded words, information which can be correctioned in country in the control of
on computer or in an electronic or machine readable form) in free of charge. You are seen in
to make an appointment for the inspection of the information and to bring this Form with your If
You then require any form of reproduction of the information, you will be liable for the fees
prescribed in Annexure B.
prequested record/portion of the record will only be released once proof of full payment is received. Reference number: Refer
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
3 To be submitted:
E-mail of information (including soundtracks if possible)
Cloud share/file transfer
Preferred language:
the language in which the record is available)
Kindly note that your request has been:
Approved
Denied, for the following reasons:

I. Fees payable with regard Item	is to your red	Cost per A4-size	Number of	Tota
		page or part thereof/item	pages/items	1000
Photocopy		uicicolnicili		
Printed copy	- multiple IS			
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor		R40.00		
		R40.00 R60.00		
For a transcription of visual images per A4-size page		Service to be outsourced. Will		
Copy of visual images		depend on the quotation of the service provider		
Transcription of an audio record, per A4-size		R24.00		
Copy of an audio record (i) Flash drive To be provided by requestor (ii) Compact disc If provided by requestor If provided to the requestor		R40.00 R40.00 R60. 00		
Postage, e-mail or any other electronic transfer: TOTAL:		Actual costs		
Deposit payable (if search	exceeds six	hours):	☐ No	
Hours of search	Amour (calculareques	l amount per		
ne amount must be paid into the fo		account:		
ame of account holder: //pe of account:				
Count number				
anch Code:				
sterence Nr.				