



## PAIA MANUAL

Prepared in terms of section 51 of the Promotion  
of Access to Information Act No. 2 of 2000 (as  
amended).

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## 1. DEFINITIONS

The following expressions have the meanings assigned to them hereunder and cognate expressions bear corresponding meanings, namely -

- 1.1 “**PAIA**” Promotion of Access to Information Act No. 2 of 2000 (as amended);
- 1.2 “**POPIA**” Protection of Personal Information Act No.4 of 2013;
- 1.3 “**REGULATOR**” shall mean the Information Regulator of the **REPUBLIC**; and
- 1.4 “**REPUBLIC**” shall mean the **REPUBLIC**.

## 2. BACKGROUND TO THE PROMOTION OF ACCESS TO INFORMATION ACT

2.1 **PAIA** was enacted on 3 February 2000 and aims to:

2.1.1 Foster and maintain a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, as contained in Section 32 of the Constitution of the **REPUBLIC**; and

2.1.2 Actively promote a society in which the people of South Africa have effective access to information, in order to cultivate the full exercise and protection of their rights.

2.2 Pursuant to Section 51 of **PAIA**, all private bodies are required to compile a manual, for purposes of compliance in respect thereof.

- 2.3 Reference to, and inclusion of, any information herein, in addition to the information, which is specifically required in terms of Section 51 of **PAIA**, does not have the effect of creating any rights or entitlements to receive such information, unless it is so prescribed in terms of **PAIA**.
- 2.4 **PAIA** gives any person who seeks access to a record of a private or public body (hereinafter referred to as a “**REQUESTER**”), a right to lodge a request for access to the information officer of a public or private body.
- 2.5 **PAIA** provides that requests for access to a company’s prescribed information may be made to the company, and that the company is obliged to make such information available, subject to applicable legislative and/or regulatory requirements, unless such information is prohibited from release, in terms of **PAIA**.

### **3. PURPOSE OF THE MANUAL**

This **PAIA** Manual is useful for the public to-

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal **PAIA** request;
- 3.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 3.3 know the description of the records of the body which are available in accordance with any other legislation;
- 3.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

- 3.5 know the description of the guide on how to use **PAIA**, as updated by the **REGULATOR** and how to obtain access to it;
- 3.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 know if the body has planned to transfer or process personal information outside the **REPUBLIC** and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

#### **4. COMPANY INTRODUCTION**

- 4.1 Itonics South Africa (Pty) Ltd with registration number 2020/848631/07 (hereinafter referred to as "**ITONICS**") is a private company duly incorporated and registered in South Africa in accordance with the provisions of the Companies Act 71 of 2008, as amended, with its registered office at Knightsbridge Office Park, Block C, Ground Floor, 33 Sloane Street, Johannesburg, 2021.

- 4.2 This manual of **ITONICS** is available for viewing at its premises situated at 32 Kloof Street, Cape Town 8000, as well as on **ITONICS's** website which can be accessed at <https://www.itonics-innovation.com>.

## 5. KEY CONTACT DETAILS (SECTION 51(1)(a))

### 5.1 Chief Information Officer

Name: Nathan Veitch

Tel: 084 307 6776

Email: [nathan.veitch@itonics-innovation.com](mailto:nathan.veitch@itonics-innovation.com)

### 5.2 National or Head Office

Postal Address: Knightsbridge Office Park, Block C, Ground Floor,  
33 Sloane Street, Johannesburg, 2021

Physical Address: 32 Kloof Street, Cape Town 8000.

Tel: 021 100 4894

Email: [privacy@itonics-innovation.com](mailto:privacy@itonics-innovation.com)

## 6. THE GUIDE REFERRED TO IN SECTION 10 OF THE ACT (SECTION 51(1)(b)(i))

- 6.1 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**.
- 6.2 The Guide is available in each of the official languages and in braille.

- 6.3 The aforesaid Guide contains the description of-
- 6.3.1 the objects of **PAIA** and **POPIA**;
  - 6.3.2 the postal and street address, phone, and fax number and, if available, electronic mail address of-
    - 6.3.2.1 the Information Officer of every public body, and
    - 6.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of **PAIA** and section 56 of **POPIA**;
  - 6.3.3 the manner and form of a request for-
    - 6.3.3.1 access to a record of a public body contemplated in section 11; and
    - 6.3.3.2 access to a record of a private body contemplated in section 50;
  - 6.3.4 the assistance available from the Information Officer of a public body in terms of **PAIA** and **POPIA**;
  - 6.3.5 the assistance available from the **REGULATOR** in terms of **PAIA** and **POPIA**;
  - 6.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by **PAIA** and **POPIA**, including the manner of lodging-

- 6.3.6.1 an internal appeal;
  - 6.3.6.2 a complaint to the **REGULATOR**; and
  - 6.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the **REGULATOR** or a decision of the head of a private body;
- 6.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
  - 6.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
  - 6.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
  - 6.3.10 the regulations made in terms of section 92.
- 6.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the **REGULATOR**, during normal working hours.
  - 6.5 The Guide can also be obtained-
    - 6.5.1 upon request to the Information Officer;

6.5.2 from the website of the **REGULATOR**  
(<https://www.justice.gov.za/infoereg/>).

6.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

6.6.1 English and Afrikaans.

## **7. SECTION 52(2) NOTICE (SECTION 51(1)(b)(ii))**

7.1 At this stage, no notices have been published on the categories of records that are automatically available, without a person having to request access in terms of **PAIA**.

7.2 However, certain information is freely available as is listed in the table below:

| Category of records                                              | Types of records                                                                   | Available by | Available on website | Available upon request |
|------------------------------------------------------------------|------------------------------------------------------------------------------------|--------------|----------------------|------------------------|
| Publicly Available Information                                   | Memorandum of Incorporation<br><br>Director's names<br><br>Incorporation Documents |              |                      | X                      |
| Personnel Records<br><br>(Only available to employees concerned) | Employment contracts and terms and conditions of employment                        |              |                      | X                      |

|                                                                |                                                                                                                         |          |          |  |
|----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|----------|----------|--|
|                                                                | Records of<br>disci<br>plina<br>ry<br>heari<br>ngs<br><br>Payslips<br><br>Company policies<br>and<br>proc<br>edur<br>es |          |          |  |
| Financial Information<br>(Only<br>availabl<br>e to<br>Clients) | Banking details<br><br>VAT Numbers                                                                                      | <b>X</b> |          |  |
| Publications                                                   | Brochures<br><br>Circulars and<br>exter<br>nal<br>news<br>letter<br>s                                                   | <b>X</b> | <b>X</b> |  |
| Service offerings                                              | Information<br><br>regar<br>ding<br><b>ITON</b>                                                                         | <b>X</b> | <b>X</b> |  |

|                     |                                                                        |  |   |  |
|---------------------|------------------------------------------------------------------------|--|---|--|
|                     | ICS'<br>S<br>area<br>s of<br>expe<br>rtise                             |  |   |  |
| Contact Information | The addresses and<br>telep<br>hone<br>num<br>bers<br>of<br>ITON<br>ICS |  | X |  |

7.3 Should a person wish to request access to any of the freely available information listed above, they may do so by contacting **ITONICS** telephonically, or via email with their request, alternatively they may visit **ITONICS'S** website to access the relevant information, where such information is available.

7.4 Additionally, the following information is available to all employees and need not be requested: -

| Category of records | Types of the Record                                                                                                                        | Freely available |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| Employee records    | Includes, amongst other things, private records provided by employees, records provided by third parties relating to employees, conditions | X                |

|  |                                                                                                                                                                                                                                                              |  |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|  | of employment and other employee-related contractual and quasi legal records, internal evaluation records, correspondence with employees, training records, records of disciplinary hearings and related matters, <b>ITONICS's</b> policies, and procedures. |  |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

7.5 Employees may access these records by directing their request to **ITONICS**.

## 8. LEGISLATION (SECTION 51(1)(b)(iii))

8.1 Certain records of **ITONICS** are available in terms of legislation other than **PAIA**. Unless disclosure is prohibited in terms of the relevant legislation, regulations, contractual agreements or otherwise, records which are required to be made available in terms of the relevant legislation shall be made available for inspection by interested parties, subject to the requirements and conditions set out in the relevant legislation and internal policies and procedures.

8.2 Accordingly, information is available in terms of the following legislation, if and where applicable:

| Item | Legislation                                                                     |
|------|---------------------------------------------------------------------------------|
| 1.   | Companies Act 71 of 2008, as amended.                                           |
| 2.   | Copyright Act 98 of 1978, as amended.                                           |
| 3.   | Trade Marks Act 194 of 1993, as amended.                                        |
| 4.   | Employment Equity Act 55 of 1998, as amended.                                   |
| 5.   | Income Tax Act 95 of 1967, as amended.                                          |
| 6.   | Labour Relations Act 66 of 1995, as amended.                                    |
| 7.   | Basic Conditions of Employment Act 75 of 1997, as amended                       |
| 8.   | Immigration Act 13 of 2002, as amended.                                         |
| 9.   | Value Added Tax Act 89 of 1991, as amended.                                     |
| 10.  | Protection of Personal Information Act 4 of 2013, as amended.                   |
| 11.  | Promotion of Access to Information Act 2 of 2000, as amended.                   |
| 12.  | Unemployment Insurance Act 30 of 1996, as amended.                              |
| 13.  | Electronic Communications and Transactions Act 25 of 2002, as amended.          |
| 14.  | Compensation of Occupational Injuries and Diseases Act 130 of 1993, as amended. |
| 15.  | Occupational Health and Safety Act 85 of 1993, as amended.                      |
| 16.  | Consumer Protection Act 68 of 2008, as amended.                                 |
| 17.  | Tax Administration Act 28 of 2011, as amended.                                  |
| 18.  | Competition Act 71 of 2008, as amended.                                         |

- 8.3 The above is not an exhaustive list of **ITONICS'S** applicable statutes, which may require the keeping of records.

## 9. FACILITATION OF A REQUEST FOR ACCESS (SECTION 51(1)(b)(iv))

- 9.1 To facilitate the processing of your request for access to a record, kindly:

9.1.1 Use the prescribed form (Form 2), of Government Notice No. R.757 dated 27 August 2021, a copy of which is annexed hereto marked **Appendix 1** and accessible via the following link: <https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>.

9.1.2 Address your request to **ITONICS**.

9.1.3 Provide sufficient details to enable **ITONICS** to identify:

9.1.3.1 The record(s) requested;

9.1.3.2 The **REQUESTER** (and if an agent is lodging the request, proof of capacity);

9.1.3.3 The form of access which is required;

9.1.3.4 The postal address, fax number, email address or other relevant information of the **REQUESTER** in the **REPUBLIC**;

9.1.3.5 The right, which the **REQUESTER** is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right;

9.1.3.6 If the **REQUESTER** wishes to be informed of the decision in any manner (in addition to the written decision), the manner and particulars thereof;

9.1.4 If the request is made on behalf of a person, to furnish proof of the capacity

in which the **REQUESTER** makes such request, to the satisfaction of **ITONICS'S**.

9.2 **ITONICS** may, and must in certain instances, refuse access to records on any of the grounds set out in Part 3 of Chapter 4 of **PAIA**, which instances include, but are not limited to, the following:

9.2.1 That access would have the effect of unreasonably disclosing **PERSONAL INFORMATION** about a third party;

9.2.2 The necessity of protecting the confidential information of a third party;

9.2.3 The necessity of protecting the safety of individuals and protecting property;

9.2.4 That the record constitutes privileged information of a third party, **ITONICS** itself; and

9.2.5 Professional privilege.

9.3 **ITONICS** will decide in relation to a request for a record within 30 (Thirty) days from the date of receipt of the request, unless third parties are required to be notified or the 30 (Thirty) day period is extended as provided for in **PAIA**. **ITONICS** will notify the **REQUESTER** accordingly.

9.4 The following applies to requests:

- 9.4.1 A **REQUESTER** is required to pay the prescribed fees (R140.00) before a request will be processed;
- 9.4.2 If the search and preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- 9.4.3 A **REQUESTER** may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 9.4.4 Records may be withheld until the fees have been paid.
- 9.4.5 Payments should be made to **ITONICS**.
- 9.5 The fee structure is available on the website of the South African Information Regulator at <https://www.justice.gov.za/inforeg/legal/20210827-gg45057gon757-PAIAregulations.pdf>, an excerpt of which is annexed hereto marked **Appendix 2**.
- 9.6 **ITONICS** will notify the requester of the outcome of the request and of any fees payable on Form 3, a copy of which is annexed hereto marked **Appendix 3**.

9.7 **ITONICS** holds records pertaining to certain subjects. The below table provides an indication of the subjects, on which **ITONICS** holds records, as well as the categories of records held on each subject.

| SUBJECTS ON WHICH<br><br><b>ITONICS</b><br><br><b>HOLDS</b><br><br><b>RECORDS.</b>             | CATEGORIES OF RECORDS HELD ON EACH SUBJECT.                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Incorporation Documents<br><br>and<br><br>documents<br><br>pertaining to<br><br><b>ITONICS</b> | Memorandum of Incorporation, share register, shareholders agreements, minutes of general meetings, lists of directors, special and ordinary resolutions.                                                                                                                                                                                                                                                               |
| Property                                                                                       | Asset registers, Lease agreements in respect of immovable property, insurance records in respect of moveable and immovable property.                                                                                                                                                                                                                                                                                   |
| Financial and Accounting<br><br>Records                                                        | Accounting records, debtors' records, creditors records, insurance reports, Auditors reports, invoices of suppliers and customers, billing information, reconciliations, credit/debit notes, journals, annual financial statements, ledgers, balance sheets, income statements, trial balances, payment schedules, cash flow statements, management accounts, banks statements, details of auditors and audit reports. |

|                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Publications               | Updates, newsletters, company information, service information and other publications prepared by <b>ITONICS</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Taxation Records           | Company Tax Returns, Company VAT records.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Administration Records     | Minutes of meetings of <b>ITONICS</b> , general correspondence, copies and correspondence relating to various insurance policies, salary work-papers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Human Resources<br>Records | Contracts of employment, list of employees, conditions of employment, payroll records, disciplinary records, leave records, remuneration records, job specifications, performance evaluations, health and safety records, personnel files, records provided by third parties relating to personnel, information relating to prospective employees including curricula vitae and application forms, employee tax information, insurance, pension and/or provident fund contributions and claims, documents relating to disciplinary and grievance procedures and all employment applications, remuneration policy, next of kin contact details, personal vehicle information, personnel training records, professional accreditations/certifications, expense claims and reimbursement information |
| Marketing                  | Content for <b>ITONICS'S</b> website, customer records, databases, product records, mailing lists for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

|                           |                                                                                                                                                                                                                                                                                                                                       |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | clients and potential clients and general correspondence.                                                                                                                                                                                                                                                                             |
| Clients (Juristic Person) | Registered name, Registration number, Registered Address and places of business for branches (if any), Postal Address, Head office Address, Income tax registration numbers, VAT registration numbers (where applicable), Email Address, Telephone number, names and details of company representatives including (where applicable). |
| Clients (Individuals)     | Full names, Income tax registration number (where applicable) and contact details including telephone and email contact information.                                                                                                                                                                                                  |
| Vendors                   | Vendor lists, Vendor names, Vendor Addresses, Vendor Contact Information, agreements with Vendors, correspondence with Vendors, transaction history and financial records, names and contact details of Vendor representatives.                                                                                                       |
| Information Technology    | The network and the systems on it, Information technology computer software, records relating to computer systems.                                                                                                                                                                                                                    |

**10. RELATIONSHIP WITH THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013, AS AMENDED ('POPIA') (SECTIONS 51(1)(c)(i) - 51(1)(c)(iv))**

**10.1 Purpose of Processing Personal Information (Section 51(1)(c)(i))**

10.1.1 **ITONICS** processes personal information for various reasons, such as: -

- 10.1.1.1 To enable use of the **ITONICS'S** website;
- 10.1.1.2 To enable **ITONICS** to identify customers, suppliers, sub-contractors, employees and any accounts they hold with **ITONICS** where applicable;
- 10.1.1.3 To provide customers, suppliers, sub-contractors, employees, with customer service and/or organisational support (where applicable);
- 10.1.1.4 For billing and payment purposes;
- 10.1.1.5 To manage transactions and to retain information concerning transaction history;
- 10.1.1.6 To contact customers, suppliers, sub-contractors, employees, and members of the public in relation to any inquiries, or to deal with any correspondence concerns, or complaints;
- 10.1.1.7 To send newsletters or marketing communications;
- 10.1.1.8 To correspond with Clients, Vendors, employees and/or members of the public;

- 10.1.1.9 To take the steps which are necessary to conclude a contract with a customer, supplier, sub-contractor, employee, and/or member of the public as the case may be;
- 10.1.1.10 To comply with contractual obligations towards customers, suppliers, sub-contractors and/or employees;
- 10.1.1.11 To comply with obligations imposed by the laws of the **REPUBLIC**;
- 10.1.1.12 Where processing is intended to protect the legitimate interests of customers, suppliers, sub-contractors, employees, and members of the public; and/or
- 10.1.1.13 Where processing is necessary to pursue to the **ITONICS'S** legitimate interests or that of a third party to whom information may be supplied.

**10.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto (Section 51(1)(c)(ii))**

| <b>Categories of Data Subjects</b> | <b>Personal Information that may be processed</b>                                                                                                                              |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Members of the public              | Names, addresses, telephone, or email addresses.                                                                                                                               |
| Customers / Clients                | name, age, address, zip/postal code, email address and phone number, when clients or customers contact us, such as to send an enquiry or make a request, any correspondence or |

| Categories of Data<br>Subjects | Personal Information that may be processed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                | application may be kept and added to your personal information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Service Providers              | Names, addresses, registration numbers or identity numbers, bank details, contact information, details of customer representatives (where applicable), financial information and VAT numbers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Employees                      | Name and surname, gender, nationality, race, marital status, date of birth, age, personal contact details, emergency contact details, ID number or passport number, as well as the personal information of employees family members for the purposes of medical aid and pension, driver's license details, languages spoken and/or details of your health, possible disability and/or criminal or credit related information , as well as your financial and tax related information, Contract of Employment or engagement, work contact details, employee or payroll number, work location, your work biography, the department in which you render services, the person to whom you are to report to, your termination/contract end date (if any), the reason for termination, your last day of work and/or the content of any |

| <b>Categories of Data Subjects</b> | <b>Personal Information that may be processed</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | <p>interviews conducted when you leave the company, Documentation in respect of your registration with any applicable authority (i.e. SARS and/or the Department of Labour), your status in respect of such registration, any registration certificates or references in respect thereof, Information in respect of your remuneration, whether hourly, contractually, or in terms of salary, information regarding allowances, overtime, bonuses and/or commission, leave payment, bank account information, income tax information, expense claims and any information of a similar nature, Information regarding statutory or contractual leave accrued and/or taken, requests and approval therefore (if any), attendance or absence information, manager and/or HR communications, Appraisals and performance review information, performance objectives and/or outcomes and any records which are kept in respect thereof, Appraisals and performance review information, performance objectives and/or outcomes and any records which are kept in respect thereof, Records and documentation regarding any training courses which have been attended, agreements in respect of such training and any certifications in respect thereof, documentation and records in respect of any claims or legal proceedings brought by the employee, mediation,</p> |

| <b>Categories of Data Subjects</b> | <b>Personal Information that may be processed</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | <p>conciliation or arbitration proceedings, settlement negotiations, records of any employee grievances or complaints and documentation pertaining to the resolution thereof, Records of any electronic communications sent or received using company equipment or company provided internet access, login and access records of on any systems or buildings, download and printing records on company equipment, call or meeting recordings, information captured by IT security which are used for health safety and security and specifically the protection of our assets, as well as health information collected in terms of the Occupational Health and Safety Act, records provided by third parties relating to employees, and information relating to prospective employees including curricula vitae and application forms.</p> |
| <b>Sub-contractors</b>             | <p>Names, addresses, registration numbers or identity numbers, bank details, contact information, details of customer representatives (where applicable), financial information, vat numbers and conformance to safety legislation and controlled process.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

**10.3 Recipients or categories of recipients to whom the personal information may be supplied (Section 51(1)(c)(iii))**

| Category of personal information                                                                                                                              | Recipients or Categories of Recipients to whom the personal information may be supplied                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Names and contact information for members of the public who contact <b>ITONICS</b>                                                                            | Various departments of <b>ITONICS</b> , who are able to respond to questions and provide necessary information to members of the public.                                                                               |
| Employee name, identity number, date of birth, address, contact number, email address, income tax number, bank details, remuneration structure and frequency. | Human Resources and Payroll Department and external auditors; Financial advisor for provident fund and medical aid.                                                                                                    |
| Employee names and contact information.                                                                                                                       | Customers, service providers, suppliers, and members of the public to the extent that such sharing is necessary to allow such customers and/or subcontractors to contact <b>ITONICS</b> and/or its relevant employees. |
| Governmental regulatory authorities, including without limitation, the                                                                                        | Governmental organisations (i.e. the Department of Labour, SARS and/or                                                                                                                                                 |

| Category of personal information                                                                                                                                                                                                                    | Recipients or Categories of Recipients to whom the personal information may be supplied                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Department of Labour, SARS and/or specific bargaining councils will receive, inter alia, your name, surname, salary, ID number, start date, termination date and reason of termination (where applicable), contributions per month and tax payable. | specific trade unions and/or bargaining councils, the Unemployment Insurance Fund etc) for purposes of compliance with legal obligations.                          |
| Employee name and surname in order to grant access to facilities and/or systems                                                                                                                                                                     | IT Department                                                                                                                                                      |
| Employee name, surname, salary ID, start date, end date, number of beneficiaries                                                                                                                                                                    | Medical Aid and retirement fund service providers.                                                                                                                 |
| Customer data that the customer provides when using the respective ITONICS services.                                                                                                                                                                | The respective subcontractors listed in the respective contracts / data processing agreements.                                                                     |
| Customer names, vat number, postal address, physical address, and financial and transaction information.                                                                                                                                            | Employees of <b>ITONICS</b> to enable them to perform their functions and/or who are responsible for performing accounting functions; Auditors of <b>ITONICS</b> . |

| Category of personal information                               | Recipients or Categories of Recipients to whom the personal information may be supplied                                                                                                                                                 |
|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Supplier names, contact information and financial information. | Employees of <b>ITONICS</b> to facilitate the rendering of required services and among <b>ITONICS'S</b> group of companies for the purposes of reporting. As well as Authorised Third Parties providing relevant financial information. |
| Supplier names, contact information and financial information. | Employees of <b>ITONICS</b> to facilitate the rendering of required services.                                                                                                                                                           |
| Supplier representatives' names and contact information.       | Employees of <b>ITONICS</b> to enable them to perform their functions and/or who are responsible for performing accounting functions.                                                                                                   |

#### **10.4 Planned transborder flows of personal information (Section 51(1)(c)(iv))**

10.4.1 From time to time, ITONICS may transfer personal information outside of the Republic of South Africa.

10.4.2 In such cases, ITONICS ensures compliance with the provisions of the Protection of Personal Information Act 4 of 2013.

#### **10.5 Security measures to be implemented to ensure confidentiality, integrity and availability of the of personal information (Section 51(1)(c)(v))**

**10.5.1** ITONICS ensures the confidentiality, integrity and availability of the personal information it processes by: -

10.5.1.1 ensuring that, outside of business hours, access to **ITONICS'S** offices is only possible by current employees who have keys for the locksets on doors entering the premises.

10.5.1.2 placing same onto secure servers, which are only accessible: -

10.5.1.2.1 from password protected computers; and

10.5.1.2.2 on a password protected server; and

10.5.1.2.3 by designated members of staff with separate access permissions, as defined by management and implemented

strictly on a specific need to access basis, on server shares applying only to their department.

**10.5.2** Backing up information to offsite, secure cloud storage. All backup data in the cloud is encrypted during transmission and remains encrypted in storage. Restore can only take place with the encryption key.

10.5.3 Installation of up-to-date anti-virus technology on all machines and regular patches and updates of software is performed to keep systems compliant.

10.5.4 Making use of a dedicated hardware firewall, to protect the corporate network from external attacks.

10.5.5 In addition, **ITONICS'S** website uses Secure Socket Layer (SSL) encryption to ensure privacy, authentication, and data integrity in internet communications.

## **11. AVAILABILITY OF THE MANUAL (SECTION 51(3))**

11.1 A copy of the Manual is available-

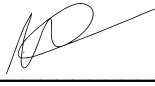
11.1.1 On: <https://www.itonics-innovation.com/>

- 11.1.2 at the head office of **ITONICS** for public inspection during normal business hours;
  - 11.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
  - 11.1.4 to the **REGULATOR** upon request.
- 11.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## 12. UPDATING OF THE MANUAL

**ITONICS** will on a regular basis update this manual.

Signed at Cape Town on this the 17th day of June 2026.

  
\_\_\_\_\_

### INFORMATION OFFICER

Duly authorised.

**FORM 2**  
**REQUEST FOR ACCESS TO RECORD**  
 [Regulation 7]

**NOTE:**

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

**TO:** The Information Officer

|  |
|--|
|  |
|  |
|  |
|  |

(Address)

E-mail address:

Fax number:

Mark with an "X"

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

| PERSONAL INFORMATION                                                                |           |  |            |
|-------------------------------------------------------------------------------------|-----------|--|------------|
| Full Names                                                                          |           |  |            |
| Identity Number                                                                     |           |  |            |
| Capacity in which request is made<br><i>(when made on behalf of another person)</i> |           |  |            |
| Postal Address                                                                      |           |  |            |
| Street Address                                                                      |           |  |            |
| E-mail Address                                                                      |           |  |            |
| Contact Numbers                                                                     | Tel. (B): |  | Facsimile: |
|                                                                                     | Cellular: |  |            |
| Full names of person on whose behalf request is made <i>(if applicable)</i> :       |           |  |            |
| Identity Number                                                                     |           |  |            |
| Postal Address                                                                      |           |  |            |
| Street Address                                                                      |           |  |            |

|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--|-----------|
| E-mail Address                                                                                                                                                                                                                                                                                                                                                                         |          |  |           |
| Contact Numbers                                                                                                                                                                                                                                                                                                                                                                        | Tel. (B) |  | Facsimile |
|                                                                                                                                                                                                                                                                                                                                                                                        | Cellular |  |           |
| <p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p> |          |  |           |
| Description of record or relevant part of the record:                                                                                                                                                                                                                                                                                                                                  |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
| Reference number, if available                                                                                                                                                                                                                                                                                                                                                         |          |  |           |
| Any further particulars of record                                                                                                                                                                                                                                                                                                                                                      |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
|                                                                                                                                                                                                                                                                                                                                                                                        |          |  |           |
| <p align="center"><b>TYPE OF RECORD</b></p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>                                                                                                                                                                                                                                                                         |          |  |           |
| Record is in written or printed form                                                                                                                                                                                                                                                                                                                                                   |          |  |           |
| Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>                                                                                                                                                                                                                                                 |          |  |           |
| Record consists of recorded words or information which can be reproduced in sound                                                                                                                                                                                                                                                                                                      |          |  |           |

|                                                                            |  |
|----------------------------------------------------------------------------|--|
| Record is held on a computer or in an electronic, or machine-readable form |  |
|----------------------------------------------------------------------------|--|

| <b>FORM OF ACCESS</b><br><i>(Mark the applicable box with an "X")</i>                                                                                                |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i> |  |
| Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>            |  |
| Transcription of soundtrack <i>(written or printed document)</i>                                                                                                     |  |
| Copy of record on flash drive <i>(including virtual images and soundtracks)</i>                                                                                      |  |
| Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>                                                                               |  |
| Copy of record saved on cloud storage server                                                                                                                         |  |

| <b>MANNER OF ACCESS</b><br><i>(Mark the applicable box with an "X")</i>                                                                                                                                                                               |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i> |  |
| Postal services to postal address                                                                                                                                                                                                                     |  |
| Postal services to street address                                                                                                                                                                                                                     |  |
| Courier service to street address                                                                                                                                                                                                                     |  |
| Facsimile of information in written or printed format <i>(including transcriptions)</i>                                                                                                                                                               |  |
| E-mail of information <i>(including soundtracks if possible)</i>                                                                                                                                                                                      |  |
| Cloud share/file transfer                                                                                                                                                                                                                             |  |
| Preferred language<br><i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>                                                                            |  |

| PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED                                                                                                                                                                                                                                                                                                                                                                 |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>                                                                                                                                                                                                                                                      |  |
| Indicate which right is to be exercised or protected                                                                                                                                                                                                                                                                                                                                                              |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
| Explain why the record requested is required for the exercise or protection of the aforementioned right:                                                                                                                                                                                                                                                                                                          |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
| FEES                                                                                                                                                                                                                                                                                                                                                                                                              |  |
| a) A request fee must be paid before the request will be considered.<br>b) You will be notified of the amount of the access fee to be paid.<br>c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.<br>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption |  |
| Reason                                                                                                                                                                                                                                                                                                                                                                                                            |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                   |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                   |  |

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

| Postal address | Facsimile | Electronic communication<br>(Please specify) |
|----------------|-----------|----------------------------------------------|
|                |           |                                              |

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

**FOR OFFICIAL USE**

|                                                                                               |  |
|-----------------------------------------------------------------------------------------------|--|
| <i>Reference number:</i>                                                                      |  |
| <i>Request received by:<br/>(State Rank, Name And<br/>Surname of Information<br/>Officer)</i> |  |
| <i>Date received:</i>                                                                         |  |
| <i>Access fees:</i>                                                                           |  |
| <i>Deposit (if any):</i>                                                                      |  |

\_\_\_\_\_  
***Signature of Information Officer***

## FEES IN RESPECT OF PRIVATE BODIES

| ITEM | DESCRIPTION                                                                                                                                                                                          | AMOUNT                                                                    |
|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| 2.   | The request fee payable by every requester                                                                                                                                                           | R140.00                                                                   |
| 3.   | Photocopy/printed black & white copy of A4-size page                                                                                                                                                 | R2.00 per page or part thereof.                                           |
| 4.   | Printed copy of A4-size page                                                                                                                                                                         | R2.00 per page or part thereof.                                           |
| 5.   | For a copy in a computer-readable format on:<br>(iii) Flashdrive (to be provided by requestor)<br>(iv) Compact disc<br>• If provided by requester<br>• If provided to requester                      | R40.00<br>R40.00<br>R60.00                                                |
| 6.   | For a transcription of visual images per A4-size page                                                                                                                                                | Service to be outsourced. Will depend on quotation from Service Provider. |
| 7.   | Copy of visual images                                                                                                                                                                                |                                                                           |
| 8.   | Transcription of an audio record, per A4-size page                                                                                                                                                   | R24.00                                                                    |
| 9.   | Copy of an audio record on:<br>(v) Flash drive (to be provided by requestor)<br>(vi) Compact disc<br>• If provided by requestor<br>• If provided to requester                                        | R40.00<br>R40.00<br>R60.00                                                |
| 10.  | To search for and prepare the record for disclosure for each hour or part or an hour, excluding the first hour, reasonably required for such search and preparation<br>To not exceed a total cost of | R 145.00<br>R 435.00                                                      |
| 11.  | Deposit: If search exceeds 6 hours                                                                                                                                                                   | One third of amount per request calculated in terms of items 2 to 8.      |
| 12.  | Postage, email or any other electronic transfer                                                                                                                                                      | Actual Expense, if any.                                                   |

**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 received.*
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Personal inspection of information at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i> is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B. |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

**OR**

**2. You requested:**

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

**3. To be submitted:**

|                                                                                         |  |
|-----------------------------------------------------------------------------------------|--|
| Postal services to postal address                                                       |  |
| Postal services to street address                                                       |  |
| Courier service to street address                                                       |  |
| Facsimile of information in written or printed format <i>(including transcriptions)</i> |  |
| E-mail of information <i>(including soundtracks if possible)</i>                        |  |
| Cloud share/file transfer                                                               |  |
| Preferred language:                                                                     |  |

(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

**4. Fees payable with regards to your request:**

| Item                                                  | Cost per A4-size page or part thereof/item                                     | Number of pages/items | Total |
|-------------------------------------------------------|--------------------------------------------------------------------------------|-----------------------|-------|
| Photocopy                                             |                                                                                |                       |       |
| Printed copy                                          |                                                                                |                       |       |
| For a copy in a computer-readable form on:            |                                                                                |                       |       |
| (i) Flash drive                                       | R40.00                                                                         |                       |       |
| • To be provided by requestor                         |                                                                                |                       |       |
| (ii) Compact disc                                     | R40.00                                                                         |                       |       |
| • If provided by requestor                            |                                                                                |                       |       |
| • If provided to the requestor                        | R60.00                                                                         |                       |       |
| For a transcription of visual images per A4-size page | Service to be outsourced. Will depend on the quotation of the service provider |                       |       |
| Copy of visual images                                 |                                                                                |                       |       |
| Transcription of an audio record, per A4-size         | R24.00                                                                         |                       |       |
| Copy of an audio record                               |                                                                                |                       |       |
| (i) Flash drive                                       | R40.00                                                                         |                       |       |
| • To be provided by requestor                         |                                                                                |                       |       |
| (ii) Compact disc                                     | R40.00                                                                         |                       |       |
| • If provided by requestor                            |                                                                                |                       |       |
| • If provided to the requestor                        | R60. 00                                                                        |                       |       |
| Postage, e-mail or any other electronic transfer:     | Actual costs                                                                   |                       |       |
| <b>TOTAL:</b>                                         |                                                                                |                       |       |

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

☐ Yes

☐ No

|                 |  |                                                                            |  |
|-----------------|--|----------------------------------------------------------------------------|--|
| Hours of search |  | Amount of deposit<br>(calculated on one third of total amount per request) |  |
|-----------------|--|----------------------------------------------------------------------------|--|

The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_

Name of account holder: \_\_\_\_\_

Type of account: \_\_\_\_\_

Account number: \_\_\_\_\_

Branch Code: \_\_\_\_\_

Reference Nr: \_\_\_\_\_

Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
*Information officer*