

MANGWANANI NORTH COAST (PTY) LTD

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information
Act 2 of 2000 (as amended)

MANGWANANI NORTH COAST (PTY) LTD

PO Box 6642, Zimbali, 4418 • Vat No: 4530232729 • Registration No: 2006/014334/07 • Director: Erin Limbert
• River Valley • Sibaya • Winelands • Ballito • Ushaka • Jozini • View • Royal Elephant
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Mangwanani

African Spa

SINCE 2002

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1 Definitions

| Term | Definition |
|----------------------------------|---|
| CEO | Chief Executive Officer |
| Client | Any natural or juristic person that received or receives services from the company |
| Complainant | Any person who lodges a complaint with the Information Regulator |
| Complaint | (a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator |
| Conditions for Lawful Processing | The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual |
| Data Subject | The person to whom Personal Information relates |
| Day | A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957) |
| DIO | Deputy Information Officer |
| Information Officer/IO | The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA |
| Manual | This manual |
| Minister | Minister of Justice and Correctional Services |
| Office Hours | (a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate |
| PAIA | The Promotion of Access to Information Act, No. 2 of 2000 |
| Personal Information | Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers |
| Personnel | Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors |

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| Term | Definition |
|------------------|---|
| POPI/POPIA | The Protection of Personal Information Act, No. 4 of 2013 |
| POPI Regulations | Regulations promulgated in terms of section 112(2) of POPI |
| Private Body | (a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body |
| Processing | Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction |
| Regulator | Information Regulator established in terms of POPIA |
| Republic | Republic of South Africa |
| Signature | Any legally accepted form of signature, including electronic signature where applicable |
| Writing | As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002) |

2 Purpose of the PAIA Manual

This PAIA Manual is useful for the public to:

- 2.1 Check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 2.2 Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- 2.3 Know the description of the records of the body which are available in accordance with any other legislation.
- 2.4 Access all the relevant contact details of the IO and DIO who will assist the public with the records that they intend to access.
- 2.5 Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.
- 2.6 Know if the body will process personal information, the purpose of processing of personal information, and the description of the categories of data subjects and of the information or categories of information relating thereto.

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- 2.7 Know the recipients or categories of recipients to whom the personal information may be supplied.
- 2.8 Know if the body has planned to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.
- 2.9 Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3 Key Contact Details for Access to Information of the Mangwanani North Coast (Pty) Ltd

3.1 Chief Information Officer

| | |
|----------------|----------------------------|
| Name | Viloshnee Nariadoo |
| Contact number | 0722656620 |
| Email address | Viloshnee@mangwanani.co.za |

3.2 Deputy Information Officer(s)

| | |
|----------------|----------------------------|
| Name | Mehroonisa Devnath |
| Contact number | 0726275394 |
| Email address | Viloshnee@mangwanani.co.za |

3.3 General contacts for access to information

| | |
|---------------|----------------------------|
| Email address | Viloshnee@mangwanani.co.za |
|---------------|----------------------------|

3.4 National or head office

| | |
|------------------|--------------------------------------|
| Postal address | 6642 Zimbali 4420 |
| Physical address | 18 Douglas Grove Drive, Ballito 4418 |
| Contact number | 032 946 0223 |
| Email | Viloshnee@mangwanani.co.za |
| Website | www.mangwanani.co.za |

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4 Guide on how to use PAIA and how to Obtain Access to the Guide

- 4.1 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.
- 4.2 The guide is available in each of the official languages and in braille.
- 4.3 The aforesaid guide contains the description of:
- 4.3.1 The objects of PAIA and POPIA;
- 4.3.2 The postal and street address, phone and fax number and, if available, email address of:
- 4.3.2.1 The IO of every public body, and
- 4.3.2.2 Every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA¹;
- 4.3.3 The manner and form of a request for:
- 4.3.3.1 Access to a record of a public body contemplated in section 11².
- 4.3.3.2 Access to a record of a private body contemplated in section 50³.
- 4.3.3.3 An internal appeal.
- 4.3.3.4 A complaint to the Regulator.
- 4.3.3.5 An application with a court against a decision by the IO 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.
- 4.3.4 The provisions of sections 14⁴ and 51⁵ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

¹ Section 56(a) of POPIA - Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA

² Section 11 of PAIA – A requester must be given access to a record of a public body if the requester complies with all the procedural requirements in PAIA relating to a request for access to that record, and if access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

³ Section 50 of PAIA – A requester must be given access to any record of a private body if:

(a) that record is required for the exercise or protection of any rights;

(b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

(c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 14 of PAIA – The Information Officer of a public body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

⁵ Section 51 of PAIA – The Information Officer of a private body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

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- 4.3.5 The provisions of sections 15⁶ and 52⁷ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.6 The notices issued in terms of sections 22⁸ and 54⁹ regarding fees to be paid in relation to requests for access;
- 4.3.7 The regulations made in terms of section 92¹⁰;
- 4.3.8 The assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.9 The assistance available from the Regulator in terms of PAIA and POPIA; and
- 4.3.10 All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging.

4.4 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.

4.5 The guide can also be obtained:

4.5.1 Upon request to the IO.

4.5.2 From the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:

4.6.1 English.

4.6.2 Afrikaans.

4.6.3 Zulu.

5 Guide of Information Regulator

5.1 A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.

5.2 The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.

5.3 Should you wish to access the guide, you may request a copy from the IO by contacting him/her using the details specified above.

⁶ Section 15 of PAIA – The Information Officer of a public body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

⁷ Section 52 of PAIA – The head of a private body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

⁸ Section 22 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

⁹ Section 54 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

¹⁰ Section 92(11) of PAIA – The Information Regulator must update and publish the guide referred to in subsection (1) at intervals of not more than two years.

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5.4 You may also inspect the guide at the company's offices during ordinary working hours.

5.5 You may also request a copy of the guide from the Information Regulator at the following details:

| | |
|----------------|--|
| Postal address | P O Box 31533, Braamfontein, Johannesburg, 2017 |
| Contact number | +27 (10) 023-5200 |
| Website | www.inforegulator.org.za |
| Email | PAIACompliance.IR@justice.gov.za |

6 Latest Notices in terms of Section 52(2) of PAIA

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

7 Availability of Certain Records in terms of PAIA

7.1 Categories of records of the Mangwanani North Coast (Pty) Ltd which are available without a person having to request access:

| Category of Records | Types of the Record | Available on Website | Available on Request |
|-----------------------------------|--|----------------------|----------------------|
| PAIA Manual | Company's current PAIA Manual | X | X |
| Company overview | Company profile, business activities, contact details | X | X |
| Terms of Use & Service Conditions | Terms & Conditions for spa services; bookings & cancellation policy; guest obligations; refund policy | X | X |
| Policies (public-facing) | Privacy Policy; Cookie Policy; possibly wellness/safety/health protocols | X | X |
| Company Overview | Company profile; business activities; contact details; number of branches; services offered (spa treatments, packages) | X | X |
| Legal disclosures | CIPC registration details; company registration number; B-BBEE status; any professional registrations if | X | X |

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| Category of Records | Types of the Record | Available on Website | Available on Request |
|--|---|----------------------|----------------------|
| | therapists require them; legal disclaimers | | |
| Marketing Materials | Brochures; spa pamphlets; treatment menus; package descriptions; special offers, Promotional emails; newsletters; special offer announcements | X | X |
| Corporate Social Investment / Responsibility Disclosures | Community engagement; empowerment programmes; welfare of employees; sustainability efforts (if disclosed) | - | X |
| POPIA and PAIA awareness training certificates | Company's attendance registers on training of POPIA and PAIA | - | X |
| Record of PAIA Requests | Description of categories of records released in response to prior PAIA requests | - | X |
| Public tender or supplier information (if applicable) | Supplier registration forms, B-BBEE (Broad-Based Black Economic Empowerment) certificate (public documents) | - | X |
| Corporate Governance | Codes of conduct; ethics statement; professional practice standards | - | X |
| Statutory Company Records | CIPC registration details, Memorandum of Incorporation, shareholding structure | - | X |
| Office / Branch Locations & Contact Info | Physical addresses of spa locations; contact telephone numbers; email addresses; map/directions | X | X |
| Contact information for IO | Name; designation; email address; telephone number of the person(s) designated as the Information Officer (under PAIA / POPIA) | X | X |

7.2 Description of the records/subjects of Mangwanani North Coast (Pty) Ltd which are available in accordance with any other legislation:

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| Category of Records | Applicable Legislation | Department/ Subject Area |
|---|--|--------------------------------|
| Memorandum of Incorporation, company registration documents, minutes of board meetings, share register | Companies Act, 71 of 2008 | Corporate Governance |
| Employment contracts, employee attendance records, payroll information, leave records | Basic Conditions of Employment Act, 75 of 1997 | Human Resources (HR) |
| Disciplinary records, grievance procedures, union agreements, Commission for Conciliation, Mediation and Arbitration (CCMA) documentation | Labour Relations Act, 66 of 1995 | HR |
| Employment Equity (EE) plans, EE reports, committee meeting minutes | Employment Equity Act, 55 of 1998 | HR |
| Tax returns, IRP5 certificates, Pay-As-You-Earn (PAYE) records, employee tax submissions | Income Tax Act, 58 of 1962 | Finance |
| Skills development plans, annual training reports, learnership agreements, training registers | Skills Development Act, 97 of 1998 | Training and Development |
| Unemployment Insurance Fund (UIF) contribution records, declarations, employee benefit claim records | Unemployment Insurance Act, 63 of 2001 | HR |
| Health and safety audits, incident/accident reports, risk assessments, safety officer records | Occupational Health and Safety Act, 85 of 1993 | Occupational Health and Safety |
| Value-Added Tax (VAT) returns, input/output tax records, SARS correspondence | Value-Added Tax Act, 89 of 1991 | Finance |
| Workers Compensation Assistance (WCA) claims, injury-on-duty reports, compensation records | Compensation for Occupational Injuries and Diseases Act, 130 of 1993 | Occupational Health and Safety |
| B-BBEE certificates, ownership and supplier development records | Broad-Based Black Economic Empowerment Act, 53 of 2003 | Supply Chain Management (SCM) |
| Client contracts, booking records, cancellations/refunds, | Consumer Protection Act, 68 of 2008 | Client Services/ Marketing |

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| Category of Records | Applicable Legislation | Department/ Subject Area |
|--|--|--------------------------------------|
| complaints, disclaimers, service terms | | |
| Data subject consent forms, privacy notices, PAIA Manual, operator agreements, processing activity records | Protection of Personal Information Act, 4 of 2013 | Legal and Compliance |
| PAIA Manual, access request logs, training records | Promotion of Access to Information Act, 2 of 2000 | Legal and Compliance |
| Electronic communications policies, e-signature consents, website terms and conditions | Electronic Communications and Transactions Act, 25 of 2002 | Information Technology (IT) |
| Document retention and disposal schedules, archive logs | National Archives and Records Service Act, 43 of 1996 | HR |
| B-BBEE certificates, ownership and supplier development records | Broad-Based Black Economic Empowerment Act, 53 of 2003 | Compliance |
| WCA claims, injury-on-duty reports, compensation records | Compensation for Occupational Injuries and Diseases Act, 130 of 1993 | Legal & Compliance |
| Financial advisory agreements, disclosure notices, complaints records | Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS) | Client Services / Legal & Compliance |
| VAT returns, input/output tax records, SARS correspondence | Value-Added Tax Act, 89 of 1991 | Finance |
| Credit agreements, affordability assessments, compliance monitoring reports. | National Credit Act, 34 of 2005 | Finance |
| Disciplinary records, grievance files, CCMA referrals and awards, strike/industrial action documentation, union correspondence | Labour Relations Act, 66 of 1995 | Human Resources (HR) |
| UIF contribution schedules, declarations to UIF, employee claim forms, UIF compliance reports | Unemployment Insurance Act, 63 of 2001 | Human Resources (HR) |
| Workplace Skills Plans (WSPs), Annual Training Reports (ATRs), learnership agreements, training registers | Skills Development Act, 97 of 1998 | Training & Development |

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| Category of Records | Applicable Legislation | Department/ Subject Area |
|--|--|--|
| Tax returns (IT14), employees' IRP5 certificates, PAYE, SDL and UIF submissions, VAT201 returns, SARS correspondence | Income Tax Act, 58 of 1962 | Finance |
| Liquor licence records (where spa offers champagne / wine with treatments) | Liquor Act, no 27 of 1989 | Compliance |
| Electronic communications policies, system use agreements, e-signature consents | Electronic Communications and Transactions Act, 25 of 2002 | IT |
| Public health and hygiene compliance records (spa hygiene, municipal inspections) | National Health Act, 61 of 2003 | Health & Safety / Operations |
| Cybersecurity incident logs, data breach reports, user monitoring records, system misuse investigations | Cybercrimes Act, 19 of 2020 | Information Technology (IT) / Legal & Compliance |

- 7.3 The company holds and/or processes the following records for the purposes of PAIA and POPIA:
- 7.3.1 PAIA: PAIA Manual; PAIA guides; PAIA records; PAIA submission records; awareness training.
- 7.3.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.
- 7.3.3 Further information which may be made available upon request.
- 7.4 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

8 Request Process

- 8.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.
- 8.2 The requester must complete Form 02 of PAIA Forms (Request for Access to Record) herein, is attached hereto and submit it to the IO at the details specified herein.

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- 8.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.
- 8.4 The prescribed form must be completed with enough particularity to enable the IO to determine:
- 8.4.1 The record(s) requested;
 - 8.4.2 The identity of the requestor;
 - 8.4.3 What form of access is required; and
 - 8.4.4 The postal address or fax number of the requestor.
- 8.5 The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.
- 8.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the IO that the request be dealt with sooner.
- 8.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held at another office of the company and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requestor in writing should an extension be necessary.
- 8.8 The IO must communicate a response to the request for access using Form 03 of PAIA Forms (Outcome of Request and of Fees Payable) herein. This communication shall inform the requestor of:
- 8.8.1 The decision; and
 - 8.8.2 Fees payable.
- 8.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.
- 8.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the IO for assistance.
- 8.11 An oral request can be made to the IO should the requestor be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requestor and provide a copy of the form to the requestor.

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- 8.12 Form 2 of POPIA Forms (Request for Correction or Deletion) herein, is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data.
- 8.13 Form 3 of POPIA Forms (Application for the Issue of a Code of Conduct) herein is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing.
- 8.14 Form 4 of POPIA Forms (Request for Consent – Direct Marketing) herein enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to.
- 8.15 Form 5 of POPIA Forms (Complaint Regarding Interference with Personal Information) herein allows a data subject or complainant to submit a complaint to the IR concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations.

9 Grounds for Refusal

The following are grounds upon which the company may, subject to the exceptions in chapter 4 of PAIA, refuse a request for access in accordance with chapter 4 of PAIA:

- 9.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.
- 9.2 Mandatory protection of the commercial information of a third party, if the records contain:
- 9.2.1 Trade secrets of that third party;
 - 9.2.2 Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 9.2.3 Information disclosed in confidence by a third party to the company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
- 9.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.

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- 9.4 Mandatory protection of the safety of individuals and the protection of property.
- 9.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.
- 9.6 Protection of the commercial information of the company, which may include:
- 9.6.1 Trade secrets;
 - 9.6.2 Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the company;
 - 9.6.3 Information which, if disclosed, could put the company at a disadvantage in contractual or other negotiations or prejudice the company in commercial competition; and/or
 - 9.6.4 Computer programs which are owned by the company, and which are protected by copyright and intellectual property laws.
- 9.7 Research information of the company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.
- 9.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10 Remedies Should a Request be Refused

- 10.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.
- 10.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

11 Fees

The following fees shall be payable upon request by a requestor:

| Details | Fee |
|--|------------------|
| Request fee (payable on every request) | R140.00 once-off |
| Photocopy of an A4 page or part thereof | R2.00 per page |
| Printed copy of an A4 page or part thereof | R2.00 per page |
| Hard copy on flash drive (flash drive to be provided by requestor) | R40.00 once-off |

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| Details | Fee |
|--|---|
| Hard copy on a compact disc (compact disc to be provided by requestor) | R40.00 once-off |
| Hard copy on a compact disc (compact disc to be provided by the company) | R60.00 once-off |
| Transcription of visual images per A4 page | As per quotation of service provider |
| Copy of visual images | As per quotation of service provider |
| Transcription of an audio record | R24.00 per A4 page |
| Copy of an audio record on flash drive (flash drive to be provided by requestor) | R40.00 once-off |
| Copy of an audio on a compact disc (compact disc to be provided by requestor) | R40.00 once-off |
| Copy of an audio on a compact disc (compact disc to be provided by the company) | R60.00 once-off |
| Base/starting rate to search for and prepare the record for disclosure | R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request) |
| Rate to search for and prepare the record for disclosure | R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost) |
| Postage, email or any other electronic transfer | Actual expense, if any |

12 Processing of Personal Information

12.1 Purpose of processing personal information:

- 12.1.1 To provide goods and services to customers, including orders, payments, deliveries, returns, refunds, promotions and marketing.
- 12.1.2 To comply with legal and regulatory requirements (tax, SARS, UIF, COIDA, Skills Development, Employment Equity, POPIA and PAIA).
- 12.1.3 To protect company assets and systems, including IT security, fraud prevention and CCTV.
- 12.1.4 To maintain records of suppliers, consultants, and subcontractors involved in projects.
- 12.1.5 To process customer orders, payments, deliveries, returns, refunds, promotions and marketing.

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12.1.6 To manage employees, including recruitment, payroll, training, performance, health and safety, and compliance with labour laws.

12.2 Description of the categories of data subjects and of the information or categories of information relating thereto:

| Categories of Data Subjects | Personal Information that may be Processed |
|--|--|
| Clients / Spa Guests | Name, surname, ID number (where required), contact details (email, phone), residential or billing address, booking details, spa package/treatment selections, payment details (card/banking info), loyalty programme details, correspondence, client preferences (massage type, wellness notes if voluntarily disclosed), cancellation/refund records. |
| Service providers | Name, company/registration number, VAT number, B-BBEE certificate details, address, contact details, banking details, contracts and correspondence. |
| Employees | Name, surname, ID number, tax number, contact details, residential address, bank details, employment contracts, payroll and benefits information, leave records, performance records, disciplinary records, qualifications, race and gender (for EE compliance), training and development records, health and safety information. |
| Contractors / Temporary Staff | Name, surname, ID number, contact details, contractual agreements, banking details, invoices, performance/attendance records. |
| Job Applicants | Name, surname, contact details, CV, qualifications, previous employment history, references, criminal or credit checks (if applicable). |
| Visitors to Spa Premises | Name, contact details, vehicle registration (if recorded), visitor registers, CCTV footage (if applicable for office/site security). |
| Regulators / Authorities | Names, designations, and contact details of officials; correspondence relating to licences, health and safety inspections, municipal permits, liquor licences, B-BBEE verification, SARS, Department of Labour, etc. |
| Website Users / Online Booking Clients | Name, contact details submitted via booking forms, email addresses, phone numbers, booking enquiry details, IP address, browser type, device information, |

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| | usage data, cookies and tracking data (for analytics, functionality, and security purposes). cookies and tracking data (for analytics, functionality, and security purposes). |
|--|---|

13 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

| Category of Personal Information | Recipients or Categories of Recipients to whom the Personal Information may be Supplied |
|---|--|
| Identity number and names (for background checks of staff/applicants) | South African Police Services (SAPS), accredited background check agencies |
| Qualifications, for qualification verifications | South African Qualifications Authority (SAQA), accredited verification bodies |
| Credit and payment history, for credit information | Credit bureaus, financial institutions |
| Tax numbers, VAT numbers, payroll and employment details | South African Revenue Service (SARS) |
| Employment Equity information (race, gender, disability) | Department of Employment and Labour (EE reporting) |
| UIF contributions and declarations | Department of Employment and Labour |
| Customer details (name, contact details, booking information, treatment preferences, payment details) | Payment service providers, banks, customer support partners, loyalty/reward programme operators |
| Personal information required for IT services (user IDs, email addresses, online activity logs) | Cloud hosting providers, IT security service providers (under operator agreements, subject to POPIA) |
| Skills development and training records | Sector Education and Training Authorities (SETAs) |
| Customer / client / stakeholder details (name, contact, project site address, project documentation) | Project partners, collaborating professionals (e.g., engineers, architects, town planners, environmental consultants), municipal planning authorities, heritage authorities, environmental regulators, and statutory approval bodies |
| Delivery / courier information (for vouchers, hampers, spa products) | Courier and logistics companies |
| Wellness / health-related information voluntarily disclosed by clients (allergies, medical notes, pregnancy status for treatment suitability) | Spa therapists, wellness practitioners, health and safety regulators (if required), only with client consent and subject to POPIA safeguards |

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| Corporate governance and statutory information | CIPC, regulators, clients, and the public where required by law |
| Banking details (employees, suppliers, service providers) | Company's bankers and authorised financial institutions |

14 Planned Transborder Flows of Personal Information

Mangwanani North Coast (Pty) Ltd may transfer or store certain categories of personal information outside the Republic of South Africa, primarily through the use of cloud-based service providers, payment gateways, marketing platforms, and IT hosting providers. These service providers may be located in jurisdictions such as the United States of America, the European Union, and other regions where global service providers host their systems.

Categories of personal information transferred may include:

- Customer information (name, contact details, delivery address, payment information, order history).
- Employee information (for payroll, HR, training, and compliance purposes where international systems are used).
- Supplier and service provider details (banking, contact, and compliance records).
- Images, descriptions, and associated stakeholder details (subject to consent) used for tenders, awards, or publications involving international organisations or platforms.
- Cloud Storage and IT System Data
- Website and online user data (IP addresses, cookies, browsing activity).

Mangwanani North Coast (Pty) Ltd will only transfer personal information across borders where the recipient country ensures adequate levels of protection or where binding agreements provide safeguards in line with Section 72 of POPIA.

- 14.1 General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information:
- 14.1.1 Compliance with applicable legislation, including the Protection of Personal Information Act (POPIA), the Promotion of Access to Information Act (PAIA), Companies Act, and Employment legislation, to ensure lawful and secure handling of personal information.
- 14.1.2 Operator agreements with third-party providers include confidentiality undertakings, breach notification obligations, and restrictions on further disclosure.
- 14.1.3 Access control and authentication measures, including password protection, role-based access, and multi-factor authentication to limit access to authorised personnel only.

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14.1.4 Physical and electronic safeguards, including CCTV footage, secure storage of physical records, and security monitoring of IT infrastructure.

14.1.5 Organisational measures include employee POPIA training, retention and disposal schedules, incident response and data breach management plan in place to ensure timely response and reporting.

15 Availability of the Manual

15.1 A copy of the manual is available:

15.1.1 On [www.mangwanani.co.za] or at any head office of Mangwanani North Coast (Pty) Ltd for public inspection during normal business hours;

15.1.2 To any person upon request and upon the payment of a reasonable prescribed fee; and

15.1.3 To the Information Regulator upon request.

15.2 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.

16 Objection to the Processing of Personal Information by a Data Subject

16.1 A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or section 11(3)(b) of the Act, must submit the objection to a responsible party at any time during office hours of a responsible party and free of charge.

16.2 A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to Form 3 herein, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11(3)(a) of the Act.

16.3 A responsible party must, when collecting personal information of a data subject, notify the data subject, in terms of section 18(1)(h)(iv) of the Act, of their right to object, as referred to in section 11(3) of the Act.

16.4 If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and upon request, be made available to the data subject in any manner, including the transcription thereof.

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17 Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

- 17.1 A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.
- 17.2 A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- 17.3 A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.
- 17.4 A request for correction to or deletion of personal information, as referred to in sub-regulation 12.11.2 or a request for the destruction or deletion of a record of personal information, as referred to in sub-regulation 12.11.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms herein free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.
- 17.5 A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which shall be free of charge.
- 17.6 A responsible party must, within 30 (thirty) days of receipt of the outcome of the request referred to in sub-regulation 12.11.2 or 12.11.3, notify a data subject, in writing, of the action taken as a result of the request

18 Updating of the Manual

The head of Mangwanani North Coast (Pty) Ltd will update this manual on a regular basis.

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|-------------------------------|--------------------------|
| Name of IO | Viloshnee Nariadoo |
| Title of the head of the body | National HR & IR Manager |

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APPLICABLE FORMS

PAIA Forms

- Form 01:** [Request for a Copy of the Guide from an Information Officer \[Regulation 3\]](#)
Form 02: [Request for Access to Record \[Regulation 7\]](#)
Form 03: [Outcome of Request and of Fees Payable \[Regulation 8\]](#)
Form 05: [Complaint Form \[Regulation 10\]](#)
Form 13: [PAIA Request for Compliance Assessment Form \[Regulation 14\(1\)\]](#)

POPIA Forms

- Form 1:** [Objection to the Processing of Personal Information](#)
Form 2: [Request for Correction or Deletion of Personal Information or Deletion of Record of Personal Information](#)
Form 3: [Application for the Issue of a Code of Conduct](#)
Form 4: [Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing](#)
Form 5: [Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing](#)

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