



PAIA & POPIA MANUAL

Published in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) and to address requirements of the Protection of Personal Information Act, 2013

This manual applies to

**GIBELA RAIL Transport Consortium RF (Pty)
Ltd**

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1. LIST OF ACRONYMS/ABBREVIATIONS AND DEFINITIONS

- 1.1 “**DIO**” Deputy Information Officer;
- 1.2 “**data subject**” means the person to whom the Personal information belongs or relates;
- 1.3 “**Gibela** ” means a company organized under the laws of the Republic of South Africa under registration number 2013/045763/07 herein also referred as the “**Responsible party**”;
- 1.4 “**IO**” Information Officer;
- 1.5 “**Information Regulator**” means the South African Information Regulator;
- 1.6 “**Minister**” means the Cabinet member responsible for the administration of justice in the Republic of South Africa;
- 1.7 “**POPIA**” means the Protection of Personal Information Act 4 of 2013;
- 1.8 “**PAIA**” means the Promotion of Access to Information Act No.2 of 2000 (as amended);
- 1.9 “**Personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to —
- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - (b) information relating to the education or the medical, financial, criminal or employment history of the person;

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- (c) any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
- (d) the blood type or any other biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.

1.10 **“Personal requester”** means a requester who is seeking access to information containing personal information about the requester.

1.11 **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including — the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as blocking, degradation, erasure or destruction of information;

1.12 **“PDF”** Portable Document Format;

1.13 **“POPIA”** Protection of Personal Information Act No. 4 of 2013;

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- 1.14 **“Private Body”** (i) a natural person who carries or has carried on any trade, business or profession, but only in such capacity; (ii) a partnership which carries or has carried on any trade, business (iii) or profession; (iv) or any former or existing juristic person, but excludes a public body;
- 1.15 **“Public body”** (i) any department or state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; (ii) or any other functionary or institution when exercising a power of performing a duty in terms of the Constitution or a provincial constitution; (iii) or exercising a public power or performing a public function on terms of any legislation;
- 1.16 **“POPIA Regulations”** means the Regulations relating to the Protection of Personal Information, 2017;
- 1.17 **“Record(s)”** means any recorded information regardless of form or medium - writing on any material information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored; label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means; book, map, plan, graph or drawing; photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced; in the possession or under the control of a Responsible party; whether or not it was created by a Responsible party; and regardless of when it came into existence;
- 1.18 **“Requester”** means a person or legal persons seeking access to information;

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1.19 “**Responsible party**” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information;

1.20 “the **body**” Gibela;

1.21 “the **Manual**” this document;

1.22 “the **Regulations**” Government Gazette Notice Number 757 of 27 August 2021: Regulations relating to the Promotion of Access to Information, 2021(Government Gazette No. 45057); and o

1.23 “**third parties**” Any natural or juristic person other than the Requester or, such party acting on behalf of the Requester or, Gibela itself;

1.24 “the **Republic**” Republic of South Africa

2. INTRODUCTION

2.1 The Promotion of Access to Information Act 2 of 2000 (“**PAIA**”) gives effect to section 32 of the Constitution of the Republic of South Africa, 1996 (“the **Constitution**”), which provides that everyone has the right to access information held by the State, as well as to information held by another person (or private body) when such privately held information is required to exercise or protect a right. This comprehensive framework underscores the significance of transparency, accountability, and open governance in a democratic society. Therefore, any such requests must comply with the procedural requirements laid down in the PAIA.

2.2 The Protection of Personal Information Act 4 of 2013 (“**POPIA**”) requires that when processing personal information, a Responsible party should give effect to the constitutional right to privacy by safeguarding personal information, subject to justifiable limitations aimed at balancing the right to privacy against other rights, particularly the right of access to information and the right to privacy.

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- 2.3 In accordance with the principles enshrined in the PAIA, individuals, whether natural or juristic persons, possess the right to seek access to Records maintained by both public and private bodies, subject to certain defined limitations. This right has been further extended and reinforced by the POPIA, which empowers data subjects to request access to information or Records from Responsible Parties, aligning with the provisions set forth in PAIA.
- 2.5 Gibela, as an organisation is committed to legal and regulatory compliance, conducts its operations in alignment with these legislative imperatives. This document, referred to as the Manual, is a testament to Gibela's dedication to fulfilling the obligations stipulated in section 51 of the PAIA and the applicable provisions of the POPIA, which pertains to private bodies. In light of the above, the Manual is intended to inform data subjects on the types of information Gibela collects, Processes, and how a data subject may request access to this information. Please note that the procedures detailed herein relates only to Personal information as defined above.
- 2.6 The scope of the Manual encompasses the diverse array of Records and information within the possession of Gibela. Its purpose is to outline the mechanisms by which these Records and information may be accessed, as well as the principles and procedures governing their publication or release to the broader public. By adhering to these provisions, Gibela aims to foster an environment of openness, trust, and cooperation, contributing to the broader objectives of the democratic governance and civic engagement.
- 2.7 In the subsequent sections of this Manual, the document will delve into the particulars of the access request process, categories of information maintained, the role and responsibilities of the IO, avenues for appeal and redress, and measures to ensure the proper management and safeguarding of Records. Gibela's commitment to transparency and the realisation of constitutional rights underpins every facet of this Manual.

3. PURPOSE OF THE MANUAL

- 3.1 To outline the mechanisms by which individuals can access Records and information held by Gibela.

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- 3.2 To set out the principles and procedures governing the publication or release of Records and information to the public.
- 3.3 To foster an environment of openness, trust, and cooperation between Gibela and the public.
- 3.4 To contribute to the broader objectives of democratic governance and civic engagement.
- 3.5 To ensure that Gibela complies with its obligations under the PAIA and the POPIA.
- 3.6 The Manual also provides information on the following topics:
- The access request process;
 - Categories of information maintained by Gibela;
 - The role and responsibilities of the Information Officer;
 - Avenues for appeal and redress;
 - Measures to ensure the proper management and safeguarding of Records;
 - To contribute to the development of a more open and transparent government.
- 3.7 The Manual is intended to be a helpful resource for anyone who wants to access information held by Gibela. It is also a demonstration of Gibela's commitment to transparency and accountability.

4. INFORMATION AND CONTACT DETAILS

4.1 The Information Officer

Name: Mr Convey Meintjies

Tel: +27 (0)10 600 0651

Email: info.legal@Gibela-rail.com

4.2 Deputy Information Officer

Name: Dr Buyiswa Mncono - Liwani

Tel: +27 (0)10 600 0651

Email: info.legal@Gibela-rail.com

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4.3 Access to information - general contacts

Email: info.legal@Gibela-rail.com

4.4 Head Office

Physical Address: 2 Shosholoza avenue, Dunnottar, Ekurhuleni

Telephone: +27 (0)10 600 0651

Email: info.legal@Gibela-rail.com

Website: <https://www.gibela-rail.com>

The Guide can also be obtained in English for public inspection during normal office hours upon request to the Information Officer.

5. RECORDS OF GIBELA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

- 5.1 Certain Records held by Gibela are available without a person having to request access by completing Form 2. These Records may be downloaded from Gibela's website: <https://www.gibela-rail.com> or by sending an email to the Deputy Information Officer.

6. RECORDS OF GIBELA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATIONS

- Auditing Profession Act No. 26 of 2005, as amended.
- Basic Conditions of Employment Act No. 75 of 1997, as amended.
- Broad Based Black Economic Empowerment Act No. 53 of 2003 ("BBBEE"), as amended.
- Companies Act No. 71 of 2008, as amended.
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993, as amended.
- Consumer Protection Act No. 68 of 2008, as amended.

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- Electronic Communications Act No. 36 of 2005, as amended.
- Electronic Communications and Transactions Act No. 25 of 2002, as amended.
- Employment Equity Act No. 55 of 1998, as amended.
- Financial Advisory and Intermediary Services Act No. 37 of 2002, as amended.
- Financial Intelligence and Centre Act No. 38 of 2001, as amended.
- Labour Relations Act No. 66 of 1995, as amended.
- Occupational Health and Safety Act No. 85 of 1993, as amended.
- Pension Funds Act No. 24 of 1956, as amended.
- Prevention and Combating of Corrupt Activities Act No. 12 of 2004, as amended.
- Prevention of Organized Crime Act No. 121 of 1998, as amended.
- Skills Development Act No. 97 of 1998. as amended.
- Skills Development Levies Act No. 9 of 1999, as amended.
- Unemployment Insurance Act No. 30 of 1996
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7. DESCRIPTION OF THE SUBJECTS ON WHICH GIBELA HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY GIBELA

7.1 The PAIA provides that a person may only request information from Gibela and/or private body if the requested information is required for the exercise or protection of a right. Further, the POPIA provides that a data subject may, upon proof of identity, request the Responsible Party to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information. The POPIA further provides that where the data subject is required to pay a fee for services provided to them by the Responsible Party:

- must provide the data with a written estimate of the payable amount before providing the service; and
- may require that the Requester pay a deposit for all or part of the fee Records.

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7.2 The following Records are held by Gibela and an application for access to a record may be subject to certain limitations.

7.3 The grounds for refusal are set out in paragraph 10 of the Manual.

7.4 **Personnel Records**

- Personal Records supplied by the employees;
- Records provided by a third party relating to employees;
- Conditions of employment and other personnel-related contractual and quasi legal Records;
- Correspondence related to personnel;
- Training Records and material and;
- Employment Equity Plans.

7.5 **Client Related Records**

- Records provided by a client to a third party acting for or on behalf of Gibela;
- Records provided by a third party;
- Records generated within Gibela related to its client; and
- Records provided by Gibela to a client.

7.6 **Records related to Gibela**

Subjects on which Gibela holds Records	Categories of Records
Various topics	Media releases
Company Secretarial and Legal	a) Statutory Records not available at Companies and Intellectual Property Commission (CIPC)

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	b) Minutes and related meeting information of Gibela c) Records of executive, board and shareholder decisions taken and related information d) Documents of incorporation e) General contract documentation f) Working papers
Marketing and Communication department	a) Market information b) Public customer information c) Performance and sales Records d) Marketing strategies e) Supplier databases f) Brand related information

These Records include, but are not limited to, the Records which pertain to Gibela's own affairs.

8. REQUEST PROCEDURE

- 8.1 Any request for information must comply with all procedural requirements contained in the PAIA for the request of access to a Record. The Requester must complete the request for information in prescribed Form 2 - Annexure 1 in this Manual in full, in order for their request to be processed.
- 8.2 Requester to submit in addition to the completed access form, a copy of their identity or any other legal means of identification, via conventional mail, e-mail and must be addressed to the Deputy Information Officer as indicated above. This fee is not applicable to Personal requesters, referring to any person seeking access to Records that contain their personal information. An initial, request fee of **R140.00** (incl. VAT) is payable on submission.

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9. FEES LEVIED FOR A REQUEST FOR INFORMATION OR RECORDS

- 9.1 Under Section 54 of PAIA, private body entities are entitled to levy a prescribed request fee to a Requester before the private body may process the request for information or Records. Fees levied are published by the Minister and are displayed below. Levies published by the Minister are subject to change and at the time of publishing the below fees were correct.

1. Access fees for reproduction	
For every black and white photocopy of an A4-size page or part thereof	R2.00
For every printed copy of an A4-size page or part thereof held on a computer	R2.00
For a copy in a computer-readable form on flash drive (provided by Requester)	R40.00
For a copy in a computer-readable form on compact disc	
• If provided by Requester	R40.00
• If provided to the Requester	R60.00
For a transcription of visual images for an A4-size page or part thereof	Service to be outsourced. Will depend
For a copy of visual images	For a copy of visual images on quotation from Service provider.
For a transcription of an audio record for an A4-size page	R24.00
For a copy of an audio record on:	
• Flash drive (to be provided by Requester)	R40.00

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• Compact disc • If provided by Requester • If provided to the Requester	R40.00 R60.00
2. Access fee for time spent	
The time reasonably required to search for the record for disclosure and preparation To not exceed a total cost of	 R145.00/hr or part thereof R435.00
3. Request fee	
For a request for access to a record by a person other than a Personal requester	R140.00
4. Deposit	
One third of the access fee is payable as a deposit by the Requester if search exceeds 6 hours	
5. Postal, email or any other electronic transfer fee	
When a copy of a record must be sent to the Requester	Actual expense, if any
6.Vat	
Gibela, as a private body registered under the Value Added Tax Act, 1991 will add VAT to all the above-mentioned fees	

10. GRANTING OR REFUSAL OF REQUESTS

10.1 All requests complying with the requirements set out above will be processed and considered expeditiously. If the request for access is granted, then Gibela will advise the Requester on the following:

- the prescribed fee for accessing the information or documentation
- payable deposit fee and balance outstanding

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- the form to be completed in which access will be given
- the right to lodge a complaint to the Information Regulator or an application with a court against the Request for Quotation (RFQ) or payment of the request fee or deposit and the procedure (including the period) for lodging the complaint to the Information Regulator or the application.

10.2 If the request for access is refused then Gibela will advise the Requester about the reasons for refusal of access, will repay the deposit to the Requester (if applicable) and may advise the Requester to lodge an application with the court against the refusal of the request.

10.3 Chapter 4 of PAIA stipulates the following grounds for refusing requests for information:

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

10.4 Gibela will give the Requester a written notice of the decision within 30 days after a decision is made on their request to access information. In case of a request being refused, the notification will include the reasons for the refusal.

10.5 Gibela may extend the 30-day notice period for a further period not exceeding 30 days after receiving the request, due to the nature of the request and the amount of time required to gather the requested information.

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10.6 The Requester will however be given notice of the extension prior to the expiry of the 30-day period and provided with reasons for the extension.

11. LODGEMENT OF COMPLAINT

11.1 The PAIA makes provision for the lodgement of a complaint to the Information Regulator or for an application to court against refusal of access to information:

- Gibela does not have an internal appeal process should a request for access to information be denied;
- Gibela will inform the Requester as soon as reasonably possible but within 30 days after the decision to refuse the requesters access to information has been taken;
- Gibela will provide the Requester with adequate reasons for the refusal, including provisions relied on without referring to details of the record;
- Gibela will provide the Requester with the procedure (including the period) for lodging a complaint to the Information Regulator or the application.

12. PROTECTION OF PERSONAL INFORMATION

12.1 Gibela requires Personal information relating to both natural and legal persons in order to carry out its business and organisational functions. The manner in which the Personal information is Processed and the purpose for which it is Processed is determined by Gibela which will be detailed below. Accordingly, Gibela as the Responsible party will ensure that the Personal information of a data subject, amongst other things as prescribed by the POPIA:

12.1.1 is Processed lawfully, fairly and transparently. This includes the provision of appropriate information to data subjects when their data is collected by Gibela, in the form of privacy or data collection notices. Gibela must also have a legal basis (for example, but not limited to, consent) to Process Personal information;

12.1.2 is Processed only for the purposes for which it was collected;

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12.1.3 will not be Processed for a secondary purpose unless that Processing is compatible with the original purpose;

12.1.4 is adequate, relevant and not excessive for the purposes for which it was collected;

12.1.5 is accurate and kept up to date;

12.1.6 will not be kept for longer than necessary;

12.1.7 is Processed in accordance with integrity and confidentiality principles – this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, is subject to an appropriate level of security when stored, used and communicated by Gibela, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;

12.1.8 is Processed in accordance with the rights of data subjects, where applicable.

12.2 Data Subjects have the right to:

12.2.1 be notified that their Personal information is being collected by Gibela. The data subject also has the right to be notified in the event of a data breach;

12.2.2 know whether Gibela holds Personal information about them and to access that information. Any request for information must be handled in accordance with the provisions of this POPIA Manual;

12.2.3 request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained Personal information;

12.2.4 object to Gibela' use of their Personal information and request the deletion of such Personal information (deletion would be subject to Gibela' Record keeping requirements);

12.2.5 object to the Processing of Personal information for purposes of direct marketing by means of unsolicited electronic communications; and

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12.2.6 complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its Personal information.

13. PURPOSE FOR PROCESSING PERSONAL INFORMATION BY GIBELA

13.1 Primarily, Gibela will use the Personal information only for the purpose for which it was originally or primarily collected. The data subjects Personal information will only be used for a secondary purpose if such purpose constitutes a legitimate interest and is closely aligned with the original or primary purpose for which one's Personal information was collected.

13.2 The purposes for which Gibela Processes Personal information includes but is not limited to:

13.2.1 rendering of services to our clients;

13.2.2 employee administration;

13.2.3 transacting with our suppliers and third party service providers;

13.2.4 maintaining Records;

13.2.5 recruitment;

13.2.6 general administration;

13.2.7 financial requirements;

13.2.8 compliance with legal and regulatory requirements;

13.2.9 facilities management; and

13.2.10 procurement Processes.

13.3 Special Personal information Processed by Gibela

Gibela will Process the following categories of special Personal information

13.3.1 information relating to racial and/or ethnic origin;

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13.3.2 trade union membership information of employees;

13.3.3 offences or alleged offences;

13.3.4 religious affiliation or other beliefs;

13.3.5 physical / mental health details; and

13.3.6 criminal proceedings, outcomes & sentences.

13.4 Categories of data subjects

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Data Subject	Personal Information Processed
Employees	ID number, contact details, physical and postal address, date of birth, age, marital status, race, employment history, criminal/background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension/ provident fund information), details related to employee performance, disciplinary procedures, employee disability information, employee pension and provident fund information, employee contracts, employee performance Records, payroll Records, electronic access Records, physical access Records, CCTV Records, health and safety Records, training Records, employment history, time and attendance Records.
Clients	Natural persons: ID number, information required for FICA compliance, contact details, physical and postal address. Legal persons: Entity name, registration number, VAT number, contact details for representative persons, FICA documentation

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Suppliers and service providers	Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, BBB-EE certificates, invoices, agreements, supplier's directors and personnel, supplier's Safeguards for Anti-Money Laundering and corruption, supplier's correspondence, Supplier's Bank account statements and Financial Statements, Agreements with suppliers, supplier's contractual obligations, supplier's Intellectual Property, Document titles and type, Service provider's registration documents, Ownership Records, Service provider's contact details, Service provider's Certifications relating to security.
Directors and shareholders	Name, surname, ID numbers, other information as required for reporting purposes
Job applicants	Name, surname, address, contact details, email address, telephone number, details of qualifications, skills, experience and employment history, current remuneration

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Personnel Records	Biographic data (Marital Status, Birth date, ID, nationality, next of kin, work, permit, visa), Race and gender, Effective start and end date with Gibela, Email Address, Personal mobile number, Title, position, department, reporting line, Permanent or fixed term contract information, Financial details, Compensation data, Qualifications, Training, Disability, Performance management Records, Tax number, Dependant data, Provident Fund Contribution, Medical claims and data, Reference and background checks
Information Technology Records	Asset Serial Number, Asset Model, Account Username, and password, Photographs and Video Footage, Type of request or incident
Website visitors	Name, email address, company name, job title and telephone number

13.5 Sharing of Personal Information

13.5.1 Gibela may share Personal information with:

- (a) other companies forming part of its parent company (Alstom/ Ubumbano) group of companies located outside of the Republic;
- (b) service providers who perform services on behalf of Gibela;
- (c) third party suppliers;
- (d) if required, by applicable law;
- (e) in connection with a re-organization or combination of our organization with another organization. If we believe that such disclosure is appropriate to enforce or apply

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terms of engagement, and other agreements or otherwise protect and defend Gibela rights, property or safety;

- (f) in order to comply with a judicial proceeding, court order or other legal obligation, or a regulatory or government inquiry; or with your consent we would like to draw particular attention to the fact that in certain jurisdictions, Gibela has a legal obligation to report suspicious transactions and other activity to relevant regulatory authorities under anti-money laundering, terrorist financing, insider dealing or related legislation;
- (g) Gibela also reports suspected criminal activity to the police and other law enforcement bodies. We are not always permitted by the law to inform you about this in advance of the disclosure, or at all.

13.6 Trans-border/Cross border flows of Personal information

13.6.1 Gibela may transfer your Personal information to recipients outside of the Republic. However, Gibela complies with the conditions for the transborder flow of Personal information as provided by section 72 of the POPIA.

13.7 Data breach and Security measures

13.7.1 Gibela takes reasonable, appropriate and adequate technical and organisational measures to ensure that your Personal information is kept secure and is protected against unauthorised or unlawful Processing, accidental loss, destruction, damage, alteration, disclosure or unauthorised access. We contractually mandate any third parties to which your Personal information is transferred to do the same.

13.7.2 Gibela implements and maintains reasonable technical and organisational measures to protect Personal information, including by way of the implementation of policies, procedures and controls aimed at preventing any unauthorised access to, loss or destruction of Personal information. Gibela has a wide range of security measures designed to mitigate data security breaches, accidental loss or destruction of, or damage to Personal information. These include the storage of Personal information relating to

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clients and employees in locked cabinets within Gibela offices; IT systems such as encryption software, password protection software. Restricted access, levels of authority, and separation of duties are in place for dealing with all Personal information.

14. EXERCISING RIGHTS AS A DATA SUBJECT IN TERMS OF THE POPIA

14.1 Withdrawal of authorisation

14.1.1 If Gibela Processes your Personal information as a data subject, because you have consented thereto, or because of a contractual relationship or in order to provide services, the data subject may withdraw the consent for the Processing of their Personal information by way of written notice to either the IO or in the manner detailed on the specific contract. It is important to note that such withdrawal of Personal information may result in it becoming impossible for Gibela to perform its obligations in terms of the contract. Such may constitute repudiation of the contract by the data subject, which may result in contract termination.

14.1.2 Should the data subject wish to object to Gibela's third party service providers Processing their Personal Information, they may complete a request for correction or deletion of Personal information in terms of section 24(1) of the POPIA.

14.2 Request for confirmation of Records held

14.2.1 In terms of section 23(1)(a) of the POPIA a data subject is entitled to request Gibela to confirm, free of charge, whether Gibela is or has Processed any Personal information pertaining to the data subject. Such request may be sent through the IO or DIO's email address as detailed on the PAIA Manual.

14.2.2 In terms of section 23(1)(b) of the POPIA, the data subject is entitled to request Gibela to provide one with a description or copies of Records containing their Personal information as well as the identity of all third parties or categories of third parties who have, or have had, access to such information.

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14.3 Request for correction of Personal Information

14.3.1 In terms of section 24 of the POPIA, the data subject is entitled to request Gibela to correct or delete Personal information about them in their possession or under Gibela's control that is inaccurate, irrelevant, excessive outdated, incomplete, misleading or which the data subject believes was unlawfully obtained, or to destroy, or delete a Record in respect of which the data subject has withdrawn for Processing by Gibela. Such request must be lodged using the form prescribed in terms of the POPIA.

14.4 Objections to Processing of Personal information

14.4.1 In terms of section 11(3) of the POPIA, a data subject may object to Processing of their Personal information if the reason for such Processing relates to:

- (a) the protection of a legitimate interest;
- (b) the pursuit of Gibela's legitimate interests or those of a third party to whom the Personal information is supplied.

15. REVIEW

15.1 This Manual will be reviewed and updated, if necessary, on a periodic basis.