
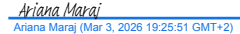




Policy Title	PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) POLICY		
Area of Impact	All	Effective Date	March 2026
Policy Owner	Jaco Beukes	Division	Corporate Services
Implemented by	Neo Maponyane	Developed by	

APPROVAL RECORD			
	Name & Surname	Signature	Date
1st Review	Neo Maponyane		
2nd Review	Ariana Maraj	 <small>Ariana Maraj (Mar 3, 2026 19:25:51 GMT+2)</small>	
Pre-approved by	Ariana Maraj	 <small>Ariana Maraj (Mar 3, 2026 19:25:51 GMT+2)</small>	
Approved by	Jaco Beukes	 <small>Jaco Beukes (Mar 3, 2026 19:45:18 GMT+2)</small>	

RECORD OF REVISIONS			
Revision No	Date Approved	Nature of Revision	Prepared By
1	30 June 2020	Inclusion of POPIA in PAIA Manual	Chantelle Fellingner & Ariana Maraj
2	March 2026	Update of personnel; revision of Appenix A (PAIA and POPI Manual)	Neo Maponyane & Ariana Maraj



TERMS AND CONDITIONS OF USE

Use of all SAIL Rights Commercialisation (Pty) Limited policies and procedures on all its divisions constitutes your agreement to the following:

DOCUMENT OWNERSHIP

All content in this document is the property of SAIL Rights Commercialisation (Pty) Limited (“**SAIL**”) and all of its subsidiaries. All rights in this regard are strictly reserved. This document is for the use of SAIL employees only and authorised contractors or suppliers. The employee may not modify, copy, distribute, transmit, reproduce, publish, create derivative works from, transfer, or sell any information or services obtained from this document. In particular, use and distribution to competitor companies and/or previous employees and/or other third party who is not an employee of SAIL is strictly forbidden. Contravention by distributing to such parties constitutes an action that contravenes the company’s rules and regulations which will result in disciplinary action and/or dismissal and/or claims for damages.

Client request for policies and procedures must be addressed through the HR/ Legal Division of SAIL where there is doubt as to what to distribute to a client. When in doubt, e-mail policy@sail.co.za.

Employee queries and clarification regarding policies to e-mail HR or policy@sail.co.za

Agreement between employee and SAIL

Use of this document is conditional on acceptance by the employee of SAIL’s terms, conditions, and notices contained herein together with any additional policies or procedures on SAIL’s Policy and Procedure Document Repository and elsewhere in the business from time to time by SAIL. By assessing and using this document, the employee is deemed to have agreed to all such terms, conditions and notices.



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1. INTRODUCTION

1.1 Purpose and Objectives

The purpose of this policy is to set out the requirements and procedures of the Promotion of Access to Information Act 2 of 2000 (“the Act”) regarding a request for access to information in order to ensure full compliance thereto by all divisions of SAIL through the appointed Information Officer.

1.2 Scope/Field/Application

The policy shall apply to all SAIL staff in the relevant divisions from which the information is being requested. To ensure widespread understanding, SAIL executive managers and all operational/business unit managers shall be familiar with, and all other staff members aware of, the principles set out in this document.

1.3 Responsibility and Authority

The Chief Executive Officer of SAIL is responsible for authorising and implementing this policy.

1.3.1. Chief Executive Officer (CEO)

The CEO is responsible for implementing and enforcing this policy and in turn insuring that all relevant persons comply with the policy as well as the requirements and procedures of the Act.

1.3.2 Divisions

Each division has the responsibility to make available, in a reasonable time and manner, the document(s) which have been requested in terms of the Act.

1.3.3 Information Officer/ Corporate Services

The Information Officer(s) have the responsibility to attend to each request received within the time periods and in the manner stipulated by the Act.



1.4 Definitions, Acronyms and Abbreviations

1.4.1 **The Act** shall mean the Promotion of Access to Information Act 2 of 2000, together with all relevant regulations published;

1.4.2 **The Information Officer** shall mean the person/ those persons duly appointed by the CEO to attend to the requests for information received by the company in terms of the Act;

1.4.3 **The/ this Manual** shall mean the manual below in Appendix A together with all annexures thereto.

1.5 References

The Promotion of Access to Information Act 2 of 2000.

The Manual prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 and all annexures attached thereto.

Form C prepared in accordance with Section 53(1) of the Promotion of Access to Information Act 2 of 2000 and all annexures attached thereto.

1.6 Laws and Regulations

Compliance with applicable Laws and Regulations for which SAIL operates would be ensured at all times. It is the responsibility of management of SAIL, or any other person appointed by management, to ensure such compliance and it is up to him/her to seek legal advice as deemed necessary.

1.7 Document Review

The Policy shall be reviewed in January annually or when required.

2. POLICY

The appointed Information Officer shall be responsible to assist any potential requesters using the procedures as set out in the Manual and the Act. All executives and divisions are responsible to assist with any approved requests



for information. The Manual shall set out and guide the procedures to be followed in order to effect compliance with this policy.

2.1 Request for Information

Any private or public person will be given opportunity to approach SAIL through the Information Officer, whose details are set out below, in order to request available company information as set out in the Manual.

2.2 Information Officer

The following person(s) are duly appointed as information Officers and may be contacted by potential requesters for assistance in terms of the Act;

Contact Person:	Jaco Beukes
Physical Address:	13 Riverview Office Park Janadel Avenue Midrand
Telephone:	011 347 1362
e-mail address:	jaco@sail.co.za

2.3 The Manual

The aim of the manual is to assist potential requesters as to the procedure to be followed when requesting access to information or documentation from the company as contemplated in terms of the Act.

The manual is followed by Form C which is to be completed by the requester when requesting access to information or documentation in terms of the Act.

The Manual may be amended from time to time, and when finalised, the latest version thereof will be made public.



3. DEVIATIONS FROM COMPANY POLICY

The documented Access to Information Policy should be adhered to at all times. Any non-conformance will be reported to the relevant EXCO member for inclusion in exception reports.

Any deviation from this procedure or related procedure should be communicated to the Quality Coordinator who will report it to the Management Review Committee. The communication should be in writing and should detail the reason for the deviation and should contain clear instructions of the alternate process to follow.

4. APPENDIXES

Appendix A - Manual Prepared in terms of S51 of the Promotion of Access to Information Act 2 of 2000

Appendix B - Form C: Request for Access to Record in terms of S53(1) of the Promotion of Access to Information Act 2 of 2000.

[Jaco Beukes \(Mar 3, 2026 19:45:18 GMT+2\)](#)

JACO BEUKES
CHIEF EXECUTIVE OFFICER

PAIA AND POPIA MANUAL



APPENDIX A

THE PURPOSE

The purpose of this document, together with SAIL's Access to Information Policy, Protection of Personal Information Policy, is to serve as a Manual of SAIL Rights Commercialisation (Pty) Ltd, and its subsidiaries ("SAIL") as required in terms of the ("PAIA") as well as the Protection of Personal Information Act 4 of 2013 ("POPIA") and to provide a reference as to the records held and the procedures that need to be followed to request access to such records.

This Manual is published pursuant to section 51 of PAIA which requires organisations to compile a manual as a guide to requesters of information.

This Manual also serves to -

1. indicate the types of records held by SAIL and the availability of such records from SAIL;
2. provide the public with a sufficient understanding of how to make a request for access to a record of SAIL, by providing a description of the subjects on which SAIL holds records and the categories of records held on each subject;
3. provide a description of the records of SAIL which are available in accordance with any other legislation;
4. provide access to all relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
5. provide a description of the guide on how to use PAIA, as updated by the Regulator;
6. inform the public as to the personal information SAIL processes, the purposes thereof, the categories of data subjects relating thereto, the recipients or categories of recipients to whom the personal information may be supplied, and whether or not SAIL plans to conduct transborder flows of personal information; and
7. describe the appropriate security measures implemented by SAIL to ensure the confidentiality, integrity and availability of the personal information which is to be processed.



INTRODUCTION

SAIL specialises in, *inter alia*, sports and entertainment, commercialisation, hospitality, events management and sponsorship.

PAIA:

SECTION I:

CONTACT PERSON AND ADDRESS DETAILS

(as required by Section 51(1)(a))

The Chief Executive Officer of SAIL has duly authorised the Deputy Information Officer below to ensure that the Act is complied with:

Contact Person: Neo Maponyane
Physical Address: 13 Riverview Office Park
Janadel Avenue
Midrand
Telephone: 011 347 1300
e-mail address: neomaponyane@sail.co.za

SECTION II:

GUIDE ON HOW TO USE THE ACT

(as required by Section 51(1)(b), as read with Section 10)



The Regulator has, in terms of section 10(1) of PAIA updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may be reasonably required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages and in braille.

The aforesaid Guide contains the description of -

1. the objects of PAIA and POPIA;
2. the postal and street address, phone and fax number and, if available, electronic mail address of -
 - 2.1 the Information Officer of every public body; and
 - 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;
3. the manner and form of a request for -
 - 3.1 access to a record of a public body contemplated in section 11 and
 - 3.2 access to a record of a private body contemplated in section 50
4. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
5. the assistance available from the Regulator in terms of PAIA and POPIA;
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 -
 - 6.1 an internal appeal;
 - 6.2 a complaint to the Regulator; and
 - 6.3 an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or decision by the Regulator or a decision of the head of a private body;



7. the provisions of sections 14 and 51 requiring a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;
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;
9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
10. the regulations made in terms of section 92.

SECTION III:

CATEGORIES OF RECORDS AVAILABLE

(as required by Section 51(1)(c))

The following categories of records are automatically available without a person having to request access in terms of this Act:

1. Statutory records

- Memorandum of association
- Articles of association
- Certificate of incorporation
- Certificate to commence business
- Register of directors
- Declarations of Directors' Interests
- CIPC Public Forms



2. Human Resources

- Employment Equity returns to the Dept of Labour
- Work skills development plans submitted to relevant Sector Education and Training Authority (SETA)
- Standard Terms and Conditions of Employment applicable to all Staff

3. Employee Benefits

- SAIL Group Provident Fund

As the above are separate entities, information pertaining to these entities must be requested direct from those funds themselves.

The actuaries of the retirement funds are Alexandra Forbes.

4. Auditors

The company's auditors are Nolands Inc.

SECTION IV:

RECORDS AVAILABLE IN ACCORDANCE WITH LEGISLATION

(as required by Section 51(1)(d))

Records are available, where applicable, in accordance with the following current South African legislation (only to the extent that the relevant Act makes disclosure of records compulsory):



- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- Electronic Communications and Transaction Act 25 of 2002;
- Employment Equity Act 55 of 1998;
- Financial Intelligence Centre Act 38 of 2001;
- Labour Relations Act 66 of 1995;
- Occupational Health and Safety Act 85 of 1993;
- Pension Funds Act 24 of 1956;
- Skills Development Levies Act 9 of 1999;
- Skills Development Act 9 of 1999;
- Unemployment Insurance Act 63 of 2001; and
- Value Added Tax Act 89 of 1991.



Other types of records held by SAIL

The table below contains a description of the types of records / subjects on which SAIL holds, and the categories of records held on each subject. These records are not automatically available without a request in terms of PAIA. A request made in terms of PAIA for records in any of the categories below may be refused in accordance with any of the grounds of refusal as set out in PAIA.

Description of record

Statutory records

- Company incorporation documents
- Share register
- Memorandum of Incorporation
- Minutes of meetings of the board of directors
- Records relating to the appointment of directors, auditors, and other officers

Income tax

- Pay-as-you-earn (PAYE) records
- Documents issued to employees for income tax purposes
- Records of payments made to South African Revenue Services on behalf of employees
- All or any statutory compliance
- Value Added Tax
- Skills development levies
- Unemployment Insurance Fund



Labour relations records

- Personnel documents and records
- Employment contracts
- Medical aid records
- Pension Fund records
- Disciplinary records
- Salary records
- Disciplinary code and/or procedures
- Leave records
- Training records
- Training manuals
- Address lists
- Internal telephone lists

Finance

- Receipts and payments
- Bank statements
- A list of the company's debtors and creditors
- Budgets
- Management accounts
- Asset registers
- Invoices
- Salaries
- Minutes of meetings
- Correspondence

Risk and compliance

- Contracts
- Policies and procedures
- Risk assessment
- Compliance records

Others

- IT usage statistics and equipment details
- Supplier lists
- Secretarial records



**SECTION V:
DETAIL TO FACILITATE A REQUEST FOR ACCESS TO RECORDS**

(as required by Section 51(1)(e))

Any request for access to records should be submitted on the prescribed form C (a copy of which is attached) which should be sent to the Information Officer whose name and address details appear in Section I hereof.

SAIL has in its possession the following categories of records on the subject matters referred to hereunder:

CHIEF EXECUTIVE OFFICER'S DEPARTMENT

- General correspondence
- Internal reports and communications
- Policy documents
- Strategy documents

ACCOUNTING DEPARTMENT

The Accounting department maintains financial and management accounts for SAIL. The Accounting department records comprise the following main categories:

- Accounting records (including bank details of companies & individuals)
- Credit Application Details
- Supplier Application Details



- Financial reports
- General correspondence
- Management reports
- VAT records
- PAYE records
- Consolidation records
- Internal reports and communications
- Technical records
- Departmental administration records
- Risk management records
- General administration records
- Audit reports and supporting working papers

COMPANY SECRETARY

The Company Secretarial functions are provided by **Corporate Services**. The Company Secretary records held by them comprise of the following main categories:

- Property records
- Intellectual property rights records (trademarks, patents, registered designs and copyright)
- General correspondence
- Investment records
- Share registration records
- Statutory records
- Minute books
- Internal reports and communications



INTERNAL AUDIT

SAIL internal audit function is being exercised by **Finance and Corporate Services**. This department's purpose is to provide independent assurance that risks are being appropriately managed. Internal Audit Records pertaining to the company comprise the following main categories:

- Risk Management Records
- General Correspondence
- Audit Practice Records
- General Administration Records
- Audit Reports and Supporting Working Papers

HUMAN RESOURCE (HR) DEPARTMENT

The Human Resource Department's primary objective is to develop and implement a competitive human resource strategy that will support SAIL. The Human Resource records comprise the following main categories:

- General correspondence
- Employee records
- General HR policies and procedures
- Training records
- Pension records
- SETA Records
- Employee benefit records



- Labour relations records
- Statutory records
- Employment equity records
- Contracts
- Payroll records
- Standard Letters and Notices

CORPORATE SERVICES DEPARTMENT

The Corporate Services department provides assistance with all corporate legal matters material to SAIL and its operating divisions. Legal department records comprise the following categories:

- Working files
- General correspondence
- Standard Letters and Notices
- Agreements and licenses
- Client and supplier information (Names, registration numbers, identity numbers, addresses, email addresses)
- Statutory records
- Litigation records
- Legal records
- Legal opinions
- Internal reports and communications

DIVISIONAL OPERATIONS



The Operational Division records comprise of the following:

- General Correspondence
- Project Management Records
- Project Budgets
- Client and supplier information (Names, registration numbers, identity numbers, addresses, email addresses)
- Contracts
- Project Reports
- Service Level Agreements
- Supplier Records
- Occupational Health and Safety Records

IT DEPARTMENT

The IT department records comprise of the following:

- Computer/mobile device usage policy documentation
- Disaster recovery plans
- Hardware asset registers
- Information security policies/procedures
- Information technology system and user manuals
- Software Licensing
- System documentation and manuals

SECTION VI:

ACCESS REQUEST PROCEDURE AND PRESCRIBED FEES



A request for access to records must be made in the prescribed Form C (a copy of which is attached) which should be sent to the address, fax number or electronic mail address.

Please note that an initial, non-refundable request fee of R50.00 (inclusive of VAT) is payable on submission. This fee is not applicable to personal requests, i.e. individual seeking access to records pertaining to those individuals themselves. Further unmarried persons who earn less than R14 712.00 per annum and married or persons with a life partner who earn less than R27 192.00 are exempt from paying the request fees.

In the event that a request for access is successful an access fee will be payable for the search, reproduction and/or preparation of records and will be calculated based on the fee prescribed under the Act. The access fee must be paid prior to access being given to the requested record. The access fees are set out on the Human Rights Commission website and can be viewed at PAIA@sahrc.org.za.

Request for information will be evaluated and the applicant will be notified within 30 days after receipt of the request in the prescribed format of the following:

Notification of extension period (if required)

Applicants must take note that in terms of the Act the 30 (thirty) days period mentioned above may be extended for a further period of not more than 30 (thirty) days under certain circumstances (details will be provided together with the notification of such extension);



The access fee and/or deposit

The applicant will be informed of the access fee (*if any*) which is payable for having access to the records. In addition, a deposit may be requested which is fully refundable in the event that the application is ultimately refused.

Decision on request

The applicant will be informed whether or not the application for access has been denied, or granted. In the event that it is granted the information referred to above pertaining to the access fee, any deposit payable and any other relevant matters will be advised. In the event that the applicant is refused the applicant will be given adequate reasons for the refusal and will be informed that the applicant may lodge an application with a Court against the refusal of the application, as well as the procedure (including the period) for lodging such application.

Grounds for refusal

The Company may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which the Company may refuse include:

- Protecting personal information that the Company holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- Protecting commercial information that the Company holds about a third party or the Company (for example trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of the Company or the third party);



- If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- If disclosure of the record would endanger the life or physical safety of an individual;- If disclosure of the record would prejudice or impair the security of property or means of transport;
- If disclosure of the record would prejudice or impair the protection of the safety of the public;
- The record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of the Company;
- Disclosure of the record would put the Company at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- The record is a computer programme; and
- The record contains information about research being carried out or about to be carried out on behalf of a third party of the Company.

Records that cannot be found or do not exist

If the Company has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

Third party information

If access is requested to a record that contains information about a third party, the Company is obliged to attempt to contact this third party to inform them of the request.



This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied.

In the event of the third party furnishing reasons for the support or denial of access, our designated contact person will consider these reasons in determining whether access should be granted, or not.

POPIA

The right to privacy is an integral human right recognised and protected in the South African Constitution and in POPIA. POPIA aims to promote the protection of privacy through providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner.

Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

SAIL needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by SAIL. SAIL is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by SAIL, in the form of privacy or data collection notices. SAIL must also have a legal basis (for example, consent) to process Personal Information;
- is processed only for the purposes for which it was collected;



- will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- is adequate, relevant and not excessive for the purposes for which it was collected;
- is accurate and kept up to date;
- will not be kept for longer than necessary;
- 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, are subject to an appropriate level of security when stored, used and communicated by SAIL, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage; and
- is processed in accordance with the rights of Data Subjects, where applicable.

SECTION I:

PURPOSE OF PROCESSING PERSONAL INFORMATION

As set out in the SAIL POPIA Policy and the Act, personal Information may only be processed for a specific purpose. The purposes for which SAIL processes or will process Personal Information is set out below:

For consumers:

a. Performing duties in terms of any agreement with consumers

b. Providing products or services to consumers



- c. Operate and manage consumers' accounts and manage any application, agreement (including payment plan applications) or correspondence consumers may have with SAIL
- d. Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about SAIL's products and services, unless consumers indicate otherwise
- e. To form a view of consumers as individuals and to identify, develop or improve products, that may be of interest to consumers
- f. Carrying out market research, business and statistical analysis
- g. Recovering any debt consumers may owe SAIL
- h. Complying with SAIL's regulatory and other obligations
- i. Any other reasonably required purpose relating to SAIL's business

For prospective consumers:

- a. Verifying and updating information
- b. Direct marketing
- c. Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to SAIL's business.

For employees:

- a. The same purposes as for consumers (above)
- b. Verification of applicant employees' information during recruitment process
- c. General matters relating to employees: i. Pension ii. Medical aid iii. Payroll iv. Disciplinary action v. Training
- d. Any other reasonably required purpose relating to the employment or possible employment relationship.

For vendors /suppliers /other businesses:



- a. Verifying information and performing checks;
- b. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- c. Payment of invoices;
- d. Complying with SAIL's regulatory and other obligations; and
- e. Any other reasonably required purpose relating to SAIL's business.

SECTION II

CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION RELATING THERETO

As per section 1 of POPI, a Data Subject may either be a natural or a juristic person. Below sets out the various categories of Data Subjects that SAIL Processes Personal Information on and the types of Personal Information relating thereto:

Employees

- a. Name and contact details
- b. Identity number and identity documents including passports
- c. Employment history and references
- d. Banking and financial details
- e. Details of payments to third parties (deductions from salary)
- f. Employment contracts
- g. Employment equity plans
- h. Medical aid records
- i. Pension Fund records
- j. Remuneration/salary records
- k. Performance appraisals
- l. Disciplinary records



- m. Leave records
- n. Training records

Consumers and prospective consumers (which may include employees)

- a. Postal and/or street address
- b. title and name
- c. contact numbers and/or e-mail address
- d. gender
- e. language
- f. financial information
- g. identity or passport number
- h. Meal preference details.

Vendors /suppliers /other businesses:

- a. Name and contact details
- b. Identity and/or company information and directors' information
- c. Banking and financial information
- d. Information about products or services
- e. Other information not specified, reasonably required to be processed for business operations

RECIPIENTS OF PERSONAL INFORMATION:

Below outlines the recipients to whom SAIL may provide a Data Subjects Personal Information to:

- a. Any firm, organisation or person that SAIL uses to collect payments and recover debts or to provide a service on its behalf;



- b. Any firm, organisation or person that/who provides SAIL with products or services;
- c. Any payment system SAIL uses;
- d. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where SAIL has a duty to share information;
- e. Third parties to whom payments are made on behalf of employees;
- f. Financial institutions from whom payments are received on behalf of data subjects;
- g. Any other operator not specified;
- h. Employees, contractors and temporary staff; and
- i. Agents.

SECTION III

SECURITY MEASURES TO BE IMPLEMENTED BY SAIL

Below sets out the types of security measures to be implemented by SAIL in order to ensure that Personal Information is respected and protected.

A preliminary assessment of the suitability of the information security measures implemented or to be implemented by SAIL may be conducted in order to ensure that the Personal Information that is processed by SAIL is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

1. Access Control of Persons

SAIL shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.



2. *Data Media Control*

SAIL undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by SAIL and containing personal data of Customers.

3. *Data Memory Control*

SAIL undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorised reading, alteration or deletion of stored data.

4. *User Control*

SAIL shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.

5. *Access Control to Data*

SAIL represents that the persons entitled to use SAIL's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

6. *Transmission Control*

SAIL shall be obliged to enable the verification and tracing of the locations / destinations to which the personal information is transferred by utilisation of SAIL's data communication equipment / devices.

7. *Transport Control*

SAIL shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.



8. Organisation Control

SAIL shall maintain its internal organisation in a manner that meets the requirements of this Manual and its POPIA Policy.

SECTION IV

INFORMATION OFFICER DETAILS

The Information Officer, together with the Deputy Information Officer is responsible for ensuring SAIL's compliance with POPIA. The Information Officer and Deputy Information Officer have been registered with the South African Information Regulator established under POPIA.

The Information Officer and Deputy Information Officer are set out below:

Abraham Jacobus Beukes | Information Officer | jaco@sail.co.za

Neo Maponyane | Deputy Information Officer | neomaponyane@sail.co.za

SECTION V

REQUESTING ACCESS TO YOUR PERSONAL INFORMATION CORRECTION/DELETION & COMPLAINTS

Any request for access to personal information records kept by SAIL should be submitted on the Personal Information Request Form (a copy of which is attached hereto as **Annexure A**) which should be sent to the Information Officer whose name and address details appear in POPIA, Section II hereof.



Any complaints regarding POPIA and the compliance of SAIL with the Act should be submitted on the POPIA Complaints Form (a copy of which is attached hereto as **Annexure B**) which should be sent to the Information Officer whose name and address details appear in POPIA, Section II hereof.

Where we are unable to resolve your complaint, to your satisfaction you have the right to complaint to the Information Regulator.

The Information Regulator: Adv Pansy Tlakula

Physical Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg 2191

Email: enquiries@infoeregulator.org.za

Website: www.infoeregular.org.za



Annexure B

POPI COMPLAINT FORM	
We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act.	
Please submit your complaint to the Information Officer:	
Name	
Contact Number	
Email Address:	
Where we are unable to resolve your complaint, to your satisfaction you have the right to complain to the Information Regulator.	
The Information Regulator: Ms Mmamoroke Mphelo	
Physical Address: SALU Building, 316 Thabo Sehume Street, Pretoria	
Email: inforreg@justice.gov.za	
Website: http://www.justice.gov.za/inforeg/index.html	
A. Particulars of Complainant	
Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	
B. Details of Complaint	
C. Desired Outcome	
D. Signature Page	
Signature:	
Date	












PAIA POLICY AND MANUAL - 2026

Final Audit Report

2026-03-03

Created:	2026-03-03
By:	Neo Maponyane (neomaponyane@sail.co.za)
Status:	Signed
Transaction ID:	CBJCHBCAABAAgd7XBR96DFA35go5mWC3lpRWGY8Aac9y

"PAIA POLICY AND MANUAL - 2026" History

-  Document created by Neo Maponyane (neomaponyane@sail.co.za)
2026-03-03 - 5:18:37 PM GMT- IP address: 102.32.73.189
-  Document emailed to Neo Maponyane (neomaponyane@sail.co.za) for signature
2026-03-03 - 5:23:31 PM GMT
-  Email viewed by Neo Maponyane (neomaponyane@sail.co.za)
2026-03-03 - 5:23:37 PM GMT- IP address: 13.245.119.109
-  Document e-signed by Neo Maponyane (neomaponyane@sail.co.za)
Signature Date: 2026-03-03 - 5:24:06 PM GMT - Time Source: server- IP address: 102.32.73.189
-  Document emailed to ariana@sail.co.za for signature
2026-03-03 - 5:24:09 PM GMT
-  Email viewed by ariana@sail.co.za
2026-03-03 - 5:24:15 PM GMT- IP address: 13.245.119.109
-  Signer ariana@sail.co.za entered name at signing as Ariana Maraj
2026-03-03 - 5:25:49 PM GMT- IP address: 102.222.251.2
-  Document e-signed by Ariana Maraj (ariana@sail.co.za)
Signature Date: 2026-03-03 - 5:25:51 PM GMT - Time Source: server- IP address: 102.222.251.2
-  Document emailed to Jaco Beukes (jaco@sail.co.za) for signature
2026-03-03 - 5:25:54 PM GMT
-  Email viewed by Jaco Beukes (jaco@sail.co.za)
2026-03-03 - 5:26:00 PM GMT- IP address: 13.244.196.243
-  Document e-signed by Jaco Beukes (jaco@sail.co.za)
Signature Date: 2026-03-03 - 5:45:18 PM GMT - Time Source: server- IP address: 41.13.12.246

✔ Agreement completed.

2026-03-03 - 5:45:18 PM GMT