

# **DN INVEST (PTY) LTD**

(REGISTRATION NUMBER: 2019/254459/07)



## **PAIA MANUAL**

PUBLISHED FOR DN INVEST (PTY) LTD AS A  
PRIVATE BODY  
IN TERMS OF SECTION 51 OF THE  
PROMOTION OF ACCESS TO INFORMATION  
ACT 2 OF 2000

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## 1 INTRODUCTION

DN Invest (Pty) Ltd (the "**Company**") is an investment holding company within the DNI Group. For purposes of this Policy, the "**DNI Group**" means the Company and its subsidiaries from time to time. The Company's primary role is to hold investments in subsidiary companies and to provide group-level governance, oversight, strategic direction and committee-level monitoring in relation to the wider DNI Group. The Company does not itself employ staff and does not ordinarily conduct the day-to-day operational activities undertaken by its operating subsidiaries.

For purposes of this Manual, the records described are records held by, or under the control of, the Company in its own capacity as a private body. Certain operational, employment, customer, supplier, regulatory or transactional records may be held by the relevant operating subsidiary within the DNI Group, rather than by the Company. Where a request relates to records held by a subsidiary, the requester may be directed to the relevant subsidiary, where appropriate.

This manual is published in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 ("**PAIA** ") [the "**Manual**"] and provides an outline of the type of records and personal information which the Company holds and processes. The Manual also explains how to submit requests for access to these records in terms of the PAIA. In addition to explaining how to access, or object to personal information held by the Company, or request correction of the personal information, in terms of Sections' 23 and 24 of the Protection of Personal Information Act 4 of 2013 (the "**POPI Act**"), the Manual also explains how to submit requests for access to these records in terms of the PAIA.

The objective of the PAIA is to give effect to the constitutional right to access to information, which information is held by a public or private body, and which information is required for the exercise or protection of any rights. The PAIA recognises the right entrenched in Section 32 of the Constitution of the Republic of South Africa, 1996 and aims to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information.

Accordingly, this PAIA Manual aims to establish and foster a culture of compliance with prevailing data protection legislation, which in turn gives rise to an environment within which the rights to access to information are actively protected and promoted.

Section 9 of the PAIA dictates that the right to access to information is not

an unlimited right and is subject to certain limitations, which include limitations which balance the rights which data subjects have to access information against other rights which data subjects and interested parties have, whether it be in terms of the Constitution of the Republic of South Africa, 1996 or otherwise. Some of these rights which the right to access to information are weighed up against are aimed at protecting the fundamental right to privacy and maintaining the confidentiality (whether it be commercial or individual confidentiality) of interested parties so as to maintain acceptable levels of governance.

### **1.1 Availability and Purpose of this PAIA Manual**

This PAIA Manual is published on the Company's website. A copy can also be requested from the Information Officer, which copy may be inspected during normal business hours at the Company's physical address set out in Clause 2 below.

The primary purpose of this PAIA Manual is to facilitate requests for access to information held by the Company, which requests shall be made in accordance with the prescribed procedures and at the rates provided for in Clause 5 of this PAIA Manual. In addition to the above, the further purposes of this PAIA Manual, are to describe the records held by the Company and to clearly articulate the grounds upon which access to any such records may be refused.

### **1.2 Availability of guides to the PAIA and POPI Acts**

The Information Regulator publishes a Guide on how to use PAIA (available in all official languages). Any person may request a copy from the Regulator or our Information Officer using PAIA Form 1.

Guides and forms to the PAIA and POPI Acts can be obtained and queries directed to:

| <b>The office of the Information Regulator:</b> |                                                                                     |
|-------------------------------------------------|-------------------------------------------------------------------------------------|
| Physical Address:                               | Woodmead North Office Park,<br>54 Maxwell Drive, Woodmead,<br>Johannesburg, Gauteng |
| Postal Address:                                 | PO Box 31533,<br>Braamfontein Johannesburg, 2017                                    |
| Phone no.                                       | +27 10 023 5200                                                                     |
| Work no.                                        | +27 10 023 5207                                                                     |
| E-mail:                                         | enquiries@inforegulator.org.za                                                      |
| Website:                                        | <a href="https://inforegulator.org.za/">https://inforegulator.org.za/</a>           |

**Note:** A Braille version of the PAIA Guide may be obtained directly from the Information Regulator upon request. Requests for Braille or other accessible formats may be submitted to the Information

Regulator at the details mentioned above.

## **2 CONTACT DETAILS**

### **Contact details in terms of Section 51 of the PAIA:**

| <b>Information Officer</b> |                                                                           |
|----------------------------|---------------------------------------------------------------------------|
| Name:                      | Liam Heinzelmann (registered with the Regulator via the eServices portal) |
| Telephone:                 | 011 100 3800                                                              |
| E-mail:                    | liamh@dninvest.co.za                                                      |
| Physical address:          | 25 Commerce Crescent Sandton, 2194                                        |
| Postal address:            | 25 Commerce Crescent Sandton, 2194                                        |

| <b>Deputy Information Officer</b> |                                                                        |
|-----------------------------------|------------------------------------------------------------------------|
| Name:                             | David Smaldon (registered with the Regulator via the eServices portal) |
| Telephone:                        | 011 100 3800                                                           |
| E-mail:                           | ds@dninvest.co.za                                                      |
| Physical address:                 | 25 Commerce Crescent Sandton, 2194                                     |
| Postal address:                   | 25 Commerce Crescent Sandton, 2194                                     |

### **General Information**

|                                       |                                    |
|---------------------------------------|------------------------------------|
| Name of private body:                 | DN Invest (Pty) Ltd                |
| Industry:                             | Telecoms & Technology              |
| Registration number:                  | 2019/254459/07                     |
| Postal address:                       | PO Box 2386, Rivonia 2128          |
| Physical address / Place of business: | 25 Commerce Crescent Sandton, 2194 |
| Telephone:                            | 011 100 3800                       |
| E-mail address:                       | info@dninvest.co.za                |
| Website:                              | www.dninvest.co.za                 |

### **Applicable Legislation:**

The Company may hold records relating to the legislation listed below, to the extent applicable to its activities as an investment holding company and group governance entity. The inclusion of a legislative reference in this Manual does not necessarily mean that the Company conducts the underlying operational activity regulated by that legislation. In certain instances, the Company may hold board,

committee, governance, compliance, oversight, reporting or due diligence records relating to legislation applicable to subsidiaries within the DNI Group.

The table below outlines the categories and subcategories of records processed by the Company. Each category and subcategory may be subject to one or more grounds for refusal of access, as provided for in Chapter 4 of the PAIA. These grounds for refusal are also described in the table under Clause 3.3 below.

|   | <b>Legislative Reference:</b>                                                    | <b>Records:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---|----------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>The Broad-Based Black Economic Empowerment Act No. 53 of 2003 (BBBEE Act)</b> | <ul style="list-style-type: none"> <li>• BBBEE certificates and scorecards.</li> <li>• BBBEE verification reports.</li> <li>• Supplier BBBEE credentials.</li> <li>• Supplier and service provider agreements.</li> <li>• Procurement and supplier approval records.</li> <li>• Information received in support of BBBEE or supplier due diligence processes.</li> </ul>                                                                                                                                                  |
| 2 | <b>The Companies Act No. 71 of 2008</b>                                          | <ul style="list-style-type: none"> <li>• Memorandum of Incorporation (MOI).</li> <li>• Share registers and securities records.</li> <li>• Board, ARC, REMCO, SETCOM and shareholder meeting notices, packs and minutes.</li> <li>• Written resolutions.</li> <li>• Statutory registers.</li> <li>• Director declarations and disclosure records.</li> <li>• Governance policies.</li> <li>• Corporate approval records.</li> <li>• Correspondence relating to corporate governance and company administration.</li> </ul> |
| 3 | <b>The Electronic Communications and Transactions Act No. 25 of 2002</b>         | <ul style="list-style-type: none"> <li>• Electronic correspondence.</li> <li>• Electronic meeting records.</li> <li>• Board portal records.</li> <li>• Electronically executed agreements.</li> <li>• Electronic signature records.</li> <li>• E-mail archives.</li> <li>• Information security and access control records.</li> <li>• Backup and disaster recovery records.</li> <li>• Electronic audit logs.</li> <li>• Records relating to online information processing.</li> </ul>                                   |

|   |                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5 | <b>Employment Governance Records (held at group level in relation to the Labour Relations Act 66 of 1995, the Basic Conditions of Employment Act 75 of 1997 and the Employment Equity Act 55 of 1998, as those Acts apply to subsidiaries within the DNI Group)</b> | <ul style="list-style-type: none"> <li>• Group remuneration policies.</li> <li>• Executive remuneration records.</li> <li>• Committee records relating to employment and remuneration matters within the DNI Group.</li> <li>• Group employment governance reports received from subsidiaries.</li> </ul>                                                                                                                                                                                                                                                                                                        |
| 6 | <b>The Income Tax Act No. 58 of 1962</b>                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Tax returns</li> <li>• Assessments</li> <li>• SARS correspondence</li> <li>• Financial statements</li> <li>• Accounting records</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 7 | <b>The Promotion of Access to Information Act No. 2 of 2000 (PAIA)</b>                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>• PAIA Manual and previous versions.</li> <li>• Where relevant, records of requests for access to information.</li> <li>• Where relevant, PAIA request forms and correspondence.</li> <li>• Where relevant, records relating to decisions to grant or refuse access.</li> <li>• Information Officer and Deputy Information Officer appointments.</li> <li>• Internal procedures relating to PAIA requests.</li> <li>• Records maintained in terms of section 51 of PAIA.</li> <li>• Correspondence with the Information Regulator relating to PAIA compliance.</li> </ul> |
| 9 | <b>The Protection of Personal Information Act (POPIA)</b>                                                                                                                                                                                                           | <ul style="list-style-type: none"> <li>• Director information.</li> <li>• Committee member information.</li> <li>• Shareholder information.</li> <li>• Supplier information.</li> <li>• Due diligence records.</li> <li>• Information officer records.</li> <li>• Where relevant, data breach records.</li> <li>• Where relevant, data subject requests.</li> </ul>                                                                                                                                                                                                                                              |

|    |                                                                                    |                                                                                                                                                                                                                                              |
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| 10 | <b>Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000</b> | <ul style="list-style-type: none"> <li>Equality and non-discrimination policies.</li> <li>Board and committee reports relating to equality and transformation.</li> <li>Records relating to compliance with equality obligations.</li> </ul> |
| 11 | <b>Tax Administration Act 28 of 2011</b>                                           | <ul style="list-style-type: none"> <li>Tax registration records. SARS correspondence and assessments. Supporting records retained in terms of section 29 of the Tax Administration Act. Tax opinions and rulings.</li> </ul>                 |

### 3 COMPANY RECORDS

#### 3.1 Availability of the Company's Records

The provisions of the PAIA, specifically the provisions of Section 50 of the Act, dictate that a requester for access to information must be afforded access to any record of the Company if the following requirements are met:

- where a particular record is required for the exercise or protection of any rights (Section 50(1)(a) of PAIA);
- where a requester complies with the procedural requirements set forth in the PAIA relating to a request for access to particular records (Section 50(1)(b) of PAIA); and
- where access to that particular record is not refused in terms of any of the grounds for refusal to access contemplated in terms of Chapter 4 of the PAIA (Section 50(1)(c) of PAIA).

The below table sets forth the categories and subcategories of records which the Company processes. Each category and subcategory of records set out below may be subject to anyone (or a number) of the grounds upon which the Company may refuse access to records. These grounds for refusal are set out in Chapter 4 of the PAIA, as well as described in the table at Clause 3.3 below.

| <b>Data Subject Categories</b>                                                                                                                                                                                                                                                                        | <b>Personal information that may be processed</b>                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Personnel</b> <ul style="list-style-type: none"> <li>The Company does not employ staff. Employment-related records of employees within the DNI Group are generally held by the relevant employing subsidiary. The Company may, however, hold group-level employment governance records,</li> </ul> | <ul style="list-style-type: none"> <li>Directors, Committee Members and Governance Participants</li> <li>Personal information that may be processed: <ul style="list-style-type: none"> <li>names, surnames and contact details;</li> <li>identity or passport numbers, where required;</li> <li>residential, postal and e-mail addresses;</li> <li>directorship, committee</li> </ul> </li> </ul> |

|                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| <p>including remuneration committee papers, group remuneration policies, transformation reports, employment equity summaries, executive remuneration information and reports submitted by subsidiaries for governance or oversight purposes.</p> | <p>membership and appointment records;</p> <ul style="list-style-type: none"> <li>- declarations of interest and conflict of interest records;</li> <li>- due diligence or verification records, where applicable;</li> <li>- board and committee attendance records;</li> <li>- statutory and regulatory filings relating to directors or office bearers;</li> <li>- correspondence with or about directors, committee members, shareholders, prescribed officers, advisers and governance participants.</li> </ul>                                                                                                                                                                                                                                                             |
| <p><b>Subsidiary, Investment, Transaction and Stakeholder Records</b></p>                                                                                                                                                                        | <ul style="list-style-type: none"> <li>• Records may include: <ul style="list-style-type: none"> <li>- records relating to the Company's subsidiaries and investments;</li> <li>- shareholder and investor records;</li> <li>- investment evaluation and due diligence records;</li> <li>- transaction records;</li> <li>- agreements with advisers, consultants, service providers, financiers and counterparties;</li> <li>- board and committee documents relating to subsidiaries;</li> <li>- reports received from subsidiaries for governance, risk, compliance, remuneration, transformation or strategic oversight purposes;</li> <li>- correspondence with shareholders, subsidiaries, advisers, regulators, financiers and other stakeholders..</li> </ul> </li> </ul> |

|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Technical Records</b> | <ul style="list-style-type: none"> <li>• Technical reports</li> <li>• Technical data</li> <li>• Plans, brands and trademarks forming part of the intellectual property rights of the Company.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Third-Party</b>       | <p><b>Records Held by Third Parties About the Company, Employees, or Clients:</b></p> <ul style="list-style-type: none"> <li>• Personnel, Client/Customer, or Company Records held by third parties</li> <li>• Records provided by third parties about contractors, suppliers, or clients/customers</li> <li>• Employee, Client, or Company Records held externally (e.g., payroll service providers, outsourced HR or IT systems)</li> </ul> <p><b>Records Held by the Company Pertaining to Third Parties</b></p> <ul style="list-style-type: none"> <li>• VAT Numbers, Banking Details, Names</li> <li>• Financial Records</li> <li>• Correspondence</li> <li>• Contractual Records</li> <li>• Electronic Mail, Logs</li> <li>• Records provided by third parties</li> <li>• Service Level Agreements (SLAs)</li> <li>• Contact Details of Suppliers</li> <li>• Details of Customers/Clients (e.g., contact details, transaction history)</li> <li>• Licenses and General Conditions for Conducting Business</li> <li>• Agreements with Stakeholders</li> </ul> |
| <b>Other Records</b>     | <ul style="list-style-type: none"> <li>• Information relating to the Company's own business activities</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Internal Records</b> | <ul style="list-style-type: none"> <li>• Basic Identifiers <ul style="list-style-type: none"> <li>○ Name, Surname, Address (including proof of address), Email Address, Telephone Number, Gender, Marital Status, Date and Place of Birth, Nationality</li> </ul> </li> <li>• Professional Information <ul style="list-style-type: none"> <li>○ Employer, Job Title, Registration Number</li> </ul> </li> <li>• Governance &amp; Statutory Records <ul style="list-style-type: none"> <li>○ Records relating to incorporation, Statutory Records, Minutes of Meetings (including Executive Committee and subcommittees), Resolutions and Directives</li> </ul> </li> <li>• Financial Records <ul style="list-style-type: none"> <li>○ Financial Records, Company Pension Fund Records and Rules, Insurance Records (e.g. professional indemnity, group life assurance, disability income protection)</li> </ul> </li> <li>• Operational Records</li> <li>• Intellectual Property Records</li> <li>• Marketing Records</li> <li>• BBBEE Information</li> <li>• Internal Documentation <ul style="list-style-type: none"> <li>○ Internal Correspondence, Internal Investigation Reports, Policies, Procedures, and Codes</li> </ul> </li> <li>• Information Technology <ul style="list-style-type: none"> <li>○ IT Records including Computer Software, Support and Maintenance Agreements</li> </ul> </li> </ul> |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Certain information relating to the Company is publicly available without a formal PAIA request, including public company registration information available from the Companies and Intellectual Property Commission ("CIPC"), publicly available director information, and general company information published on the Company's website. No notice has been published in terms of section 52(2), and the table below is provided for the convenience of

requesters only and does not constitute a notice under section 52:

| Type of record                    | How you can access it                                                                       |
|-----------------------------------|---------------------------------------------------------------------------------------------|
| Memorandum of incorporation (MOI) | Where publicly available through the CIPC or on request, subject to applicable requirements |
| Directors' names                  | Available through CIPC/BizPortal where publicly available                                   |
| Public Statutory Records          | The Companies and Intellectual Property Commission                                          |
| Company Overview                  | <a href="http://www.dninvest.co.za">www.dninvest.co.za</a>                                  |

### 3.2 Access to Health or Other Records

Although the Company does not ordinarily hold health records, the following will apply to the extent that any health or similar records are held by or under the control of the Company:

- If a request for access to health or other records provided by a health practitioner, in their capacity as such, relates to the physical, mental health, or well-being of the requester, or if the request has been made on behalf of the person to whom the record relates ("**the relevant person**"), and the Company's Information Officer is of the opinion that the disclosure of the record to the relevant person might cause harm to his or her physical, mental health or well-being, the Company's Information Officer may, before giving access to such record consult with a health practitioner who has been nominated by the relevant person.
- If the relevant person is below the age of 16 years, a person having parental responsibilities for the relevant person must make the above nomination and if the relevant person is incapable of managing his or her affairs, a person appointed by the court to manage those affairs must make that nomination.
- If, after being given access to the relevant record, the health practitioner consulted is of the opinion that the disclosure of the record to the relevant person, would be likely to cause serious harm to his or her physical, mental health or well-being, the Information Officer may only grant access to the relevant record if the requester proves that adequate provision is made for such counselling or arrangements as are reasonably practicable before, during or after the disclosure of the record to limit, alleviate or avoid such harm to the relevant person. Before access to the record is given to a requester, the person responsible for such counselling or arrangement must be given access to the record.

### 3.3 Grounds for Refusal of Access to the Company's Record

Upon receipt of a request for access to information, the Company will be required to consider such a request in light of the provisions of Section 50 of the PAIA. Subject to such consideration, the Company will be required to either grant such a request or refuse such a request. If the Company elects to refuse access to a particular

record, such refusal will be subject to the Company's interpretation of the various prescribed grounds for refusal as set forth in Chapter 4 of the PAIA and in the table below:

| <b>Ground(s) For Refusal</b>                                                                       | <b>Description and Explanation of Ground(s) for Refusal</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Mandatory protection of privacy of third party who is a natural person [Section 63 of PAIA]</b> | The Company must refuse access to a record if the disclosure of that record would involve the unreasonable disclosure of personal information relating to a third party, including a deceased individual.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Mandatory protection of commercial information of third party [Section 64 of PAIA]</b>          | <p>The Company must refuse a request for access to a record if the record comprises of or is constituted by the following information relating to a third party –</p> <ul style="list-style-type: none"> <li>• Trade secrets of a third party.</li> <li>• Financial, commercial, scientific or technical information, other than trade secrets, of a third party, which if disclosed is likely to cause harm to the commercial or financial interests of the third party.</li> <li>• Information which has been supplied in confidence by a third party, the disclosure of which could reasonably be expected to place the third party at a disadvantage in contractual or other negotiations or is likely to prejudice the third party in commercial competition.</li> </ul> |
| <b>Protection of certain confidential information of a third Party [Section 65 of PAIA]</b>        | <p>The Company must refuse a request for access to a record if its disclosure could reasonably be expected to endanger the life or physical safety of an individual.</p> <p>The Company may refuse a request for access to a record if its disclosure would be likely to prejudice or impair the security of: A building, structure, or system (including, but not limited to, a computer or communication system), a means of transport, or any other property; or the methods, systems, plans, or procedures implemented for the protection of an individual in accordance with a witness protection scheme, the safety of the public or any part of the public, or the security of property.</p>                                                                           |

|                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Discretionary protection of safety of individuals and protection of property [Section 66 of PAIA]</b></p>                                            | <p>The Company may refuse a request for access to a record if its disclosure could reasonably be expected to endanger the life or physical safety of an individual, or if its disclosure would be likely to prejudice or impair the security of:</p> <ul style="list-style-type: none"> <li>• a building, structure or system, including but not limited to a computer or communication system, a means of transport or any other property.</li> <li>• method(s), system(s), plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public or the security of property.</li> </ul>                                                                                                                                                                                                                                  |
| <p><b>Commercial information of Private Body [Section 68 of PAIA]</b></p>                                                                                  | <p>The Company may refuse a request for access to a record if the record contains (or comprises of):</p> <ul style="list-style-type: none"> <li>• Trade secrets of the Private Body.</li> <li>• Financial, commercial, scientific or technical information, other than trade secrets of the Private Body, the disclosure of which would be likely to cause harm to the commercial or financial interests of the Private Body.</li> <li>• Information, the disclosure of which could reasonably be expected to put the Private Body at a disadvantage in contractual or other negotiations or prejudice the Private Body in commercial competition.</li> <li>• A computer programme (as defined in Section 1(1) of the Copyright Act 98 of 1978 as amended) owned by the Private Body, except insofar as it is required to give access to a record to which access is granted in terms of the PAIA Act.</li> </ul> |
| <p><b>Discretionary protection of research information of third party, and protection of research information of private body [Section 69 of PAIA]</b></p> | <p>The Company may refuse a request for access to a record if the record contains information about research being or to be carried out by or on behalf of a third party/private body, the disclosure of which would be likely to expose the third party/private body, a person that is (or will be) carrying out the research on behalf of the third party/private body, or the subject matter of the research to serious disadvantage.</p> <p>If the Company is unable to locate a requested record, or if the record does not exist, the Information Officer will notify the requester by way of an affidavit or affirmation, as contemplated in section 55 of PAIA, setting out the steps taken to locate the record. That notice is regarded as a decision to refuse the request.</p>                                                                                                                        |

|                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                             | <p>If the Company fails to give a decision on a request within the period contemplated in Clause 6.2 below, the Company is, in terms of section 58 of PAIA, regarded as having refused the request, and the requester may pursue the remedies set out in Clause 6.1 below.</p> <p>Where a request relates to a record containing personal information about, or the commercial or confidential information of, a third party, the Information Officer will, in terms of sections 71 to 73 of PAIA, take all reasonable steps to inform that third party of the request within 21 days, afford the third party 21 days to make written or oral representations or to consent to disclosure, and notify the third party of the decision taken, including of that party's right to lodge a complaint with the Information Regulator.</p> |
| <b>Mandatory protection of records privileged from production in legal proceedings [Section 67 of PAIA]</b> | The Company must refuse a request for access to a record if the record is privileged from production in legal proceedings, unless the person entitled to the privilege has waived it. This includes records subject to legal professional privilege and litigation privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Mandatory disclosure in the public interest [Section 70 of PAIA]</b>                                     | Despite any of the grounds for refusal set out above, the Company must grant a request for access to a record if the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and the public interest in the disclosure of the record clearly outweighs the harm contemplated in the relevant provision.                                                                                                                                                                                                                                                                                                                                                                                                 |

#### 4 PROCESSING OF PERSONAL INFORMATION

##### **Data Subject Information at Collection (Section 18 of the POPI Act)**

The Company takes any activities relating to the protection and processing of personal information (as defined in terms of the provisions of Section 1 of the POPI Act) very seriously. To promote the constitutional right to privacy, as well as to play its part in promoting the rights protected in terms of the POPI Act, the Company undertakes to, in so far as is required of it, observe the requirements and conditions for the lawful processing of personal information.

When collecting personal information, the Company takes reasonably practicable steps to make data subjects aware of: (a) the information collected and, where not collected directly, the source; (b) our name and address; (c) the purposes of collection; (d) whether the supply is mandatory or voluntary; (e) the consequences of not providing it; (f) any particular law authorising collection; (g) any intended transfers to foreign countries and the protection there; and (h) further information necessary to ensure reasonable processing, such as recipients or categories of recipients, the nature of the information, the rights of

access/correction/objection, and the right to complain to the Information Regulator (with contact details).

#### **4.1 The Purposes for which The Company Processes Personal Information**

The Company may process personal information for the following purposes, to the extent applicable to its role as an investment holding company and group governance entity:

- maintaining statutory company records;
- maintaining shareholder, director, prescribed officer and committee member records;
- facilitating board, shareholder and committee meetings;
- managing corporate governance, compliance, audit, risk, remuneration and transformation oversight;
- assessing, managing and monitoring investments, subsidiaries and transactions;
- conducting due diligence and verification checks, where necessary;
- appointing and managing advisers, consultants, independent contractors, service providers and suppliers;
- complying with tax, accounting, statutory, regulatory and governance obligations;
- maintaining financial, accounting, audit and tax records;
- managing legal claims, disputes, investigations and regulatory enquiries;
- maintaining information security, access control and business continuity records;
- considering reports submitted by subsidiaries for group governance and oversight purposes;
- responding to PAIA, POPIA and other lawful requests;
- communicating with shareholders, directors, committee members, subsidiaries, advisers, regulators, suppliers and other stakeholders.

#### **4.2 Categories of Data Subjects and Personal Information Processed by the Company**

The categories of data subjects whose personal information may be processed by the Company include, to the extent applicable:

- directors, prescribed officers and committee members;
- shareholders and beneficial owners;
- representatives of subsidiaries and group companies;
- representatives of suppliers, service providers, advisers, consultants and independent contractors;

- regulatory authorities and their representatives;
- transaction counterparties and their representatives;
- complainants, requesters or other persons engaging with the Company under PAIA, POPIA or other applicable laws;
- website users or persons who communicate with the Company electronically;
- other stakeholders whose personal information is provided to the Company in the course of its governance, investment, statutory, compliance or oversight functions.

#### **4.3 The Processing of Personal Information and Categories of Recipients with Whom Personal Information Is Shared**

The categories of personal information processed by the Company may include, to the extent applicable:

- names and surnames;
- identity or passport numbers;
- contact details, including e-mail addresses, telephone numbers, physical and postal addresses; company registration numbers and related statutory information;
- directorship, office bearer, shareholder, beneficial ownership and committee membership information;
- professional and occupational information;
- financial, banking, tax and payment information;
- declarations of interest and related governance information;
- verification, due diligence and compliance information;
- correspondence and records of engagement with the Company;
- information contained in board, committee, shareholder, governance, audit, risk, remuneration, transformation, legal, compliance and transaction records.

We undertake to process any personal information in a manner which promotes the constitutional right to privacy, retains accountability and data subject participation. In any circumstances where we process the personal information of data subjects, the Company maintains appropriate privacy notices where the purposes of the processing of any personal information and the processing takes place, is recorded and communicated to data subjects.

Where required under POPIA, the Company seeks to ensure that appropriate written agreements or contractual provisions are in place with operators or service providers who process personal information on behalf of the Company, including provisions dealing with confidentiality, security safeguards and lawful processing.

#### 4.4 Information Security Measures to Protect Personal Information

We have, and continue to, implement reasonable, technical and organisational measures for the protection of personal information processed by the Company. We at all times take reasonable and appropriate security measures to secure the integrity and confidentiality of personal information in our possession in order to guard against:

- the loss of, damage to or unauthorised destruction of personal information;
- the unlawful access or processing of personal information; or
- the wilful manipulation of personal information.

We will take steps to ensure that any third-party process operators (as defined in terms of Section 1 of the POPI Act) who process personal information on behalf of the Company apply adequate safeguards as outlined above.

Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by an unauthorised person, the Company will, in terms of section 22 of the POPI Act, notify the Information Regulator and the affected data subject as soon as reasonably possible after the discovery of the compromise, having regard to the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the Company's information system. Notification to the data subject will be in writing and will provide sufficient information to allow the data subject to take protective measures, including a description of the possible consequences of the compromise, the measures the Company intends to take or has taken to address it, a recommendation as to what the data subject can do to mitigate the possible adverse effects, and, if known, the identity of the unauthorised person. The Company will use the form, template or process prescribed or made available by the Information Regulator from time to time.

#### 4.5 Trans-Border Flows of Personal Information

We transfer personal information cross-border only if one of Section 72 of the POPI Act safeguards applies: (i) the recipient is subject to a **law, binding corporate rules** or a **binding agreement** that provides an adequate level of protection (including onward-transfer limits); (ii) the **data subject consents**; (iii) the transfer is **necessary for a contract** with, or in the interest of, the data subject; or (iv) the transfer benefits the data subject where consent can't practicably be obtained but would likely be given. The Company will assess the applicable basis for any cross-border transfer of personal information and, where reasonably practicable, retain records of the safeguard relied upon for such transfer.

#### 4.6 Personal Information Received from Third Parties

Where the Company receives personal information from a third party, the Company will take reasonably practicable steps, where required, to satisfy itself that the information has been lawfully collected and may lawfully be disclosed to, and processed by, the Company. This may include obtaining appropriate warranties, confirmations or contractual undertakings from the third party.

#### 4.7 Data Subject Requests Sections 23 - 24 POPI Act

A request for access to personal information in terms of section 23 of the POPI Act must be made on PAIA Form 2 (Annexure B to this Manual). A request for the correction, deletion or destruction of personal information in terms of section 24 of the POPI Act must be made on POPIA Form 2 (Regulation 3 of the POPIA Regulations). An objection

to processing in terms of section 11(3) of the POPI Act must be made on POPIA Form 1 (Regulation 2). POPIA Forms 1 and 2 are available on the Information Regulator's website and from the Information Officer.

### **Special personal information and the personal information of children**

The Company does not ordinarily process special personal information as contemplated in section 26 of the POPI Act, or the personal information of children as contemplated in section 34. Where such information is processed - for example, information relating to criminal behaviour arising from fit and proper, sanctions or background screening of directors and prescribed officers - the Company processes it only where a justification under section 27 (or, in the case of a child, section 35) applies, and in particular where the processing is necessary for the establishment, exercise or defence of a right or obligation in law, or is required by law.

### **Prior authorisation**

The Company will not carry out any processing that requires the prior authorisation of the Information Regulator in terms of section 57 of the POPI Act - including the processing of information concerning criminal behaviour or unlawful or objectionable conduct on behalf of third parties, and the transfer of special personal information or the personal information of children to a third party in a foreign country that does not provide an adequate level of protection - unless and until that authorisation has been obtained.

## **5 PRESCRIBED REQUEST FORMS AND FEES**

### **5.1 How To Gain Access to Records Held by the Company**

Records which are held by the Company may be accessed by requests for such access to information and documentation in the prescribed manner and subject to certain requirements being met. In this regard, a requester is any person making a request for access to a record held by the Company. There are two types of requesters:

- A Personal Requester: A personal requester is a requester who is seeking access to a record containing personal information about the requester. The Company will voluntarily provide the requested information or give access to any record with regard to the requester's personal information. In this regard, the prescribed fees for the reproduction of this information requested may be charged.
- Other Requester: This requester (other than a personal requester) is entitled to request access to information on third parties. The Company is, however, not obliged to voluntarily grant access and the requester must fulfil the procedural requirements for access in terms of the PAIA, including the payment of a request and access fee.

Requests for access to records must be made by completing the prescribed Form 2 (Regulation 7), included as Annexure B to this Manual, and paying the requester's fee. Where such access is granted in terms of this PAIA Manual, the information and documentation will be made available at the offices of the Company (the particulars of which appear in Clause 2 above) or in the manner requested, should this be reasonable and possible. The manner of access will include:

- Perusal with copying of material, if needed, and at the prescribed fee for copies;
- Access to visual, audio-visual material with a transcription, dubbing, copying or both, if required.

To facilitate the processing of any request by a requester for information or documentation in terms of this PAIA Manual, requesters are required to follow the procedure set forth herein below:

- i. Use the prescribed Form 2 attached hereto as **Annexure B**.
- ii. Address your request to the Information Officer.
- iii. Provide sufficient detail to enable the Company or any authorised person dealing with a request to identify:
  - a) The record(s) requested;
  - b) The requester (and, if an agent is lodging the request on behalf of someone, proof of capacity and authorisation);
  - c) The South African postal address, email address or fax number of the requester;
  - d) The form of access required;
  - e) If the requester wishes to be informed of the decision in any manner (in addition to being informed in writing), the manner and particulars thereof;
  - f) The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required in order to exercise or protect the right.

## **5.2 Prescribed Fees**

The following applies to requests (other than personal requests):

- i. A requester, other than a personal requester, is required to pay the prescribed request fee before a request will be processed. A personal requester (a requester seeking access to a record containing personal information about that requester) is not required to pay a request fee, but remains liable for the applicable access fees.
- ii. If the preparation of the record requested requires more than the prescribed hours, a deposit shall be paid (calculated on one third of total amount per request).
- iii. A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- iv. Records may be withheld until the fees have been paid.

The detailed Fee Structure as prescribed in terms of Section 54 of the PAIA is reflected in the prescribed form 3 attached hereto as **Annexure C**.

## **5.3 Access to Prescribed Forms and Fees**

Prescribed forms and fees are published on the Company's website. Copies can also be requested from the Information Officer (see contact details in Clause 2). PAIA Forms 1, 2, 3 and 5, and POPIA Forms 1 and 2, may also be downloaded from the Information Regulator's website at <https://info regulator.org.za>.

## **6 REMEDIES & DECISION**

### **6.1 Remedies**

The Company does not have an internal appeal procedure regarding PAIA and POPI Act requests for access to information. As such, the decision made by the Information Officer, is final.

If a request is denied and the requester is dissatisfied with the Information Officer's decision, the requester will be required to exercise such external remedies at their disposal if a request for information is refused.

In terms of Section 77A of the PAIA, if a request is denied by the head of a private body, the requester may lodge a complaint with the Information Regulator using PAIA **Form 5**, available on the Regulator's website or eServices portal, within **180 days** of the decision.

In terms of section 78(1) of PAIA, a requester may apply to a court for appropriate relief in terms of section 82 only after the complaints procedure referred to in section 77A has been exhausted. A requester who is aggrieved by a decision of the Information Regulator may, in terms of section 78(2), apply to a court with appropriate jurisdiction within 180 days of that decision. A requester who approaches a court without first lodging a complaint with the Information Regulator does so at the risk of the application being dismissed.

Complaints to the Information Regulator may be submitted to [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za) or through the Regulator's eServices portal. **Form 5** is available on the Regulator's website.

### **6.2 Time Afforded to the Company**

The Company is required to, within 30 (thirty) days of receipt of a request, decide whether to grant or decline the request and, if required, provide the requester with reasons to that effect.

The 30 (thirty) day period stipulated in the Clause above may be extended for a further period of not more than 30 (thirty) days if the request is for a large amount of information, or the request requires an extensive search for information which cannot reasonably be obtained within the originally stipulated 30 (thirty) day period.

In the circumstances contemplated in the Clause above. The Company will notify the requester in writing should an extension be sought.

**COMPILED BY DN INVEST (PTY) LTD  
9 September 2026**

ANNEXURE A | FORM 1

REQUEST FOR A COPY OF THE GUIDE

FORM 1

[Regulation 2]

I,

|                                              |                     |  |             |  |
|----------------------------------------------|---------------------|--|-------------|--|
| Full names:                                  |                     |  |             |  |
| In my capacity as (mark with "x"):           | Information officer |  | Other       |  |
| Name of *public/private body (if applicable) |                     |  |             |  |
| Postal Address:                              |                     |  |             |  |
| Street Address:                              |                     |  |             |  |
| E-mail Address:                              |                     |  |             |  |
| Facsimile:                                   |                     |  |             |  |
| Contact numbers:                             | Tel .(B ):          |  | Cell ular : |  |

hereby request the following copy(ies) of the Guide:

| Language (mark with "X") |                          |            | No of copies | Language (mark with "X") |                          |          | No of copies |
|--------------------------|--------------------------|------------|--------------|--------------------------|--------------------------|----------|--------------|
| <input type="checkbox"/> | <input type="checkbox"/> | Sepedi     |              | <input type="checkbox"/> | <input type="checkbox"/> | Sesotho  |              |
| <input type="checkbox"/> | <input type="checkbox"/> | Setswana   |              | <input type="checkbox"/> | <input type="checkbox"/> | siSwati  |              |
| <input type="checkbox"/> | <input type="checkbox"/> | Tshivenda  |              | <input type="checkbox"/> | <input type="checkbox"/> | Xitsonga |              |
| <input type="checkbox"/> | <input type="checkbox"/> | Afrikaans  |              | <input type="checkbox"/> | <input type="checkbox"/> | English  |              |
| <input type="checkbox"/> | <input type="checkbox"/> | isiNdebele |              | <input type="checkbox"/> | <input type="checkbox"/> | isiXhosa |              |
| <input type="checkbox"/> | <input type="checkbox"/> | isiZulu    |              |                          |                          |          |              |

Manner of collection (mark with "x"):

| Person al collecti on | Postal address | Facsimil e | Electronic communication (Please specify) |
|-----------------------|----------------|------------|-------------------------------------------|
|                       |                |            |                                           |

Signed at \_\_\_\_\_this \_\_\_\_\_day of \_\_\_\_\_20 \_\_\_\_\_

Signature of requester

**ANNEXURE B | FORM 2**

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

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

**TO: The Information Officer**

|                                              |                                              |
|----------------------------------------------|----------------------------------------------|
| Information Officer: Liam Heinzelmann        | Deputy Information Officer: David Smaldon    |
| Address: 25 Commerce Crescent, Sandton, 2194 | Address: 25 Commerce Crescent, Sandton, 2194 |
| Email: liamh@dninvest.co.za                  | Email: ds@dninvest.co.za                     |
| Telephone Number: 011 100 3800               | Telephone Number: 011 100 3800               |

Mark with an “**X**”

[ ] Request is made in my own name [ ] Request is made on behalf of another person

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

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

|                                                                                                                                                                                                                                                |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Transcription of soundtrack (written or printed document)                                                                                                                                                                                      |  |
| Copy of record on flash drive (including virtual images and soundtracks)                                                                                                                                                                       |  |
| Copy of record on compact disc drive (including virtual images and soundtracks)                                                                                                                                                                |  |
| Copy of record saved on cloud storage server                                                                                                                                                                                                   |  |
| <b>MANNER OF ACCESS</b><br><i>(Mark the applicable box with an "X")</i>                                                                                                                                                                        |  |
| Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) |  |
| Postal services to postal address                                                                                                                                                                                                              |  |
| Postal services to street address                                                                                                                                                                                                              |  |
| Courier service to street address                                                                                                                                                                                                              |  |
| Facsimile of information in written or printed format (including transcriptions)                                                                                                                                                               |  |
| E-mail of information (including soundtracks if possible)                                                                                                                                                                                      |  |
| Cloud share/file transfer                                                                                                                                                                                                                      |  |
| Preferred language<br>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)                                                                            |  |
| <b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b><br><i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>                       |  |
| Indicate which right is to be exercised or protected                                                                                                                                                                                           |  |
| Explain why the record requested is required for the exercise or protection of the aforementioned right:                                                                                                                                       |  |

|             |  |
|-------------|--|
|             |  |
| <b>FEES</b> |  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| a) <i>A request fee must be paid before the request will be considered.</i><br>b) <i>You will be notified of the amount of the access fee to be paid.</i><br>c) <i>The fee payable for access to a record depends on the form in which access is required, and the reasonable time required to search for and prepare a record.</i><br>d) <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i> |  |
| Reason                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |

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

| <b>Postal Address</b> | <b>Facsimile</b> | <b>Electronic Communication<br/>(Please specify)</b> |
|-----------------------|------------------|------------------------------------------------------|
|                       |                  |                                                      |

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

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

**FOR OFFICIAL USE**

|                                                                                           |  |
|-------------------------------------------------------------------------------------------|--|
| <i>Reference number</i>                                                                   |  |
| <i>Request received by:<br/>(State rank, Name and Surname of<br/>Information Officer)</i> |  |
| <i>Date received</i>                                                                      |  |

|                         |  |
|-------------------------|--|
| <i>Access fees</i>      |  |
| <i>Deposit (if any)</i> |  |

---

***Signature of Information Officer***

**ANNEXURE C | FORM 3**

**OUTCOME OF REQUEST AND OF FEES PAYABLE**

[Regulation 8]

*Note:*

- 1. If your request is granted the—*
  - (a) amount of the deposit, (if any), is payable before your request is processed; and*
  - (b) requested record/portion of the record will only be released once proof of full payment is received.*
- 2. Please use the reference number hereunder in all future correspondence.*

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

Reference Number: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

**1. You requested:**

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

**OR**

**2. You requested:**

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

**3. To be submitted:**

|                                                                                                                                                                      |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Postal services to postal address                                                                                                                                    |  |
| Postal services to street address                                                                                                                                    |  |
| Courier service to street address                                                                                                                                    |  |
| Facsimile of information in written or printed format(including transcriptions)                                                                                      |  |
| E-mail of information (including soundtracks if possible)                                                                                                            |  |
| Cloud share/file transfer                                                                                                                                            |  |
| Preferred language:<br>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available) |  |

Kindly note that your request has been: ☐  
Approved ☐ Denied, for the following reasons:

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

| Item                                                                                                                                                                     | Cost per A4-size page or part thereof/item      | Number of pages/items | Total |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-----------------------|-------|
| Photocopy                                                                                                                                                                |                                                 |                       |       |
| Printed copy                                                                                                                                                             |                                                 |                       |       |
| For a copy in a computer-readable form on:<br>Flash drive<br>To be provided by requester<br>ii) Compact disc<br>If provided by requester<br>If provided to the requester | R40.00<br><br><br>R40.00<br>R60.00              |                       |       |
| For a transcription of visual images per A4-size page                                                                                                                    | Service to be outsourced.<br>Will depend on the |                       |       |
| Copy of visual images                                                                                                                                                    | Quotation of                                    |                       |       |

|                                                                                                                  |        |                       |                  |  |
|------------------------------------------------------------------------------------------------------------------|--------|-----------------------|------------------|--|
|                                                                                                                  |        | The service provider  |                  |  |
| Transcription of record, per A4-size                                                                             | a<br>n | a<br>u<br>d<br>i<br>o | R24.00           |  |
| Copy of an audio record:<br>Flash drive<br>To be provided by requester<br>Compact disc                           |        |                       | R40.00           |  |
| <ul style="list-style-type: none"> <li>If provided by requester</li> <li>If provided to the requester</li> </ul> |        |                       | R40.00<br>R60.00 |  |
| Postage, e-mail or any other electronic transfer:                                                                |        |                       | Actual Costs     |  |
| <b>TOTAL:</b>                                                                                                    |        |                       |                  |  |

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

☐ Yes

☐ No

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

The amount must be paid into the following Bank account:

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

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

Type of account: \_\_\_\_\_ Account number:

\_\_\_\_\_ Branch Code: \_\_\_\_\_ Reference Nr:

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

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

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

## ANNEXURE D | PRIVACY POLICY - DN INVEST PROPRIETARY LIMITED ("COMPANY")

### 1 DEFINITIONS

In this Policy (as defined below), unless the context requires otherwise, the following capitalised terms shall have the meanings given to them —

- 1.1 **"Applicable Laws"** means any laws applicable to personal information and data protection, including POPIA, PAIA and any applicable regulations, notices, codes, directives, rulings, court orders or other binding legal requirements applicable to the Company.
- 1.2 **"Company"** means DN Invest (Pty) Ltd, an investment holding company within the DNI Group, with registration number 2019/254459/07.
- 1.3 **"Data Subject"** means any natural or juristic person to whom Personal Information relates, including directors, committee members, shareholders, beneficial owners, representatives of subsidiaries, advisers, consultants, suppliers, service providers, regulators, requesters and other stakeholders who engage with the Company.
- 1.4 **"DNI Group"** means the Company, its subsidiaries and other group companies or affiliated entities, as applicable from time to time.
- 1.5 **"Group Company"** means any company forming part of, or affiliated with, the DNI Group.
- 1.6 **"Information Officer"** means the person appointed or recognised as the Company's Information Officer under POPIA and PAIA, as reflected in the Company's PAIA Manual.
- 1.7 **"Operator"** means a person or entity who Processes Personal Information for, or on behalf of, the Company, where the Company acts as the Responsible Party.
- 1.8 **"PAIA"** means the Promotion of Access to Information Act 2 of 2000.
- 1.9 **"Personal Information"** means personal information as defined in POPIA, including information relating to an identifiable natural person and, where applicable, an identifiable juristic person.
- 1.10 **"Policy"** means this Privacy Policy, as amended from time to time.
- 1.11 **"POPIA"** means the Protection of Personal Information Act 4 of 2013.

- 1.12 **"Processing"** means any operation or activity concerning Personal Information, including collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, consultation, use, dissemination, restriction, erasure or destruction.
- 1.13 **"Responsible Party"** means the Company, where it determines the purpose of and means for Processing Personal Information.
- 1.14 **"Special Personal Information"** means special personal information as contemplated in POPIA, which may include certain sensitive categories of information, and which will only be Processed by the Company where permitted by law and where required for legitimate governance, statutory, compliance or legal purposes.
- 1.15 **"Website"** means the website owned or operated by the Company from time to time, currently [www.dninvest.co.za](http://www.dninvest.co.za), to the extent applicable.

## 2 INTRODUCTION

- 2.1 This Policy regulates how the Company processes Personal Information in its capacity as an investment holding company and group governance entity within the DNI Group.
- 2.2 The Company's primary role is to hold investments in subsidiaries and to provide group-level governance, strategic oversight, compliance oversight, audit and risk oversight, remuneration oversight, transformation oversight and related corporate governance functions.
- 2.3 The Company does not itself employ staff. Employment, customer, operational, product, service delivery and day-to-day trading records are generally held by the relevant operating subsidiary, unless such records are provided to or held by the Company for governance, investment, statutory, compliance, audit, risk, remuneration, transformation, transaction or legal oversight purposes.
- 2.4 This Policy should be read together with the Company's PAIA Manual and any privacy notices issued by the Company from time to time.
- 2.5 The Company may amend this Policy from time to time. The latest version should be read together with the Company's PAIA Manual and any applicable privacy notices issued by the Company.

## **1 PURPOSE AND APPLICATION**

- 1.1 The purpose of this Policy is to explain what Personal Information the Company may Process, why it is Processed, where it may be obtained from, the categories of persons with whom it may be shared, and how the Company protects such information.
- 1.2 This Policy applies to Personal Information Processed by or on behalf of the Company in relation to its statutory, governance, investment, shareholder, board, committee, compliance, tax, legal, audit, risk, remuneration, transformation, transaction and stakeholder functions.
- 1.3 Where Personal Information relates to employees, customers, suppliers or operations of a subsidiary, the relevant subsidiary may be the Responsible Party in respect of that information. The Company may nevertheless hold extracts, reports, summaries or committee materials relating to such information for group-level governance and oversight purposes.

## **2 COLLECTING & PROCESSING OF PERSONAL INFORMATION/PERSONAL DATA**

- 2.1 The Company may collect Personal Information directly from a Data Subject, from a Group Company, from advisers, consultants, service providers, regulators, public sources, transaction counterparties, due diligence processes, statutory filings, correspondence, meetings, board and committee packs, or other lawful sources.

### **2.2 Categories of Data Subjects:**

- 2.2.1 directors, prescribed officers, board observers and committee members;
- 2.2.2 shareholders, beneficial owners and their representatives;
- 2.2.3 representatives of subsidiaries and other Group Companies;
- 2.2.4 representatives of suppliers, service providers, professional advisers, consultants, independent contractors and financiers;
- 2.2.5 transaction counterparties and their representatives;
- 2.2.6 regulators, public bodies and their representatives;
- 2.2.7 PAIA requesters, POPIA requesters, complainants and other persons engaging with the Company in relation to legal or regulatory matters;

- 2.2.8 website users and persons who communicate with the Company electronically; and
- 2.2.9 other stakeholders whose Personal Information is provided to or held by the Company in connection with its governance, investment, statutory, compliance, legal or oversight functions.

### **2.3 Categories of Personal Information:**

- 2.3.1 names, surnames, identity or passport numbers and contact details;
- 2.3.2 physical, postal and e-mail addresses, telephone numbers and related correspondence details;
- 2.3.3 company registration numbers, tax numbers, VAT numbers and other statutory information;
- 2.3.4 directorship, office bearer, committee membership, shareholder, beneficial ownership and governance information;
- 2.3.5 professional, employment-related or occupational information where relevant to a person's role, authority or representation of a Group Company, supplier, adviser or other stakeholder;
- 2.3.6 financial, banking, payment, invoice, tax and accounting information;
- 2.3.7 declarations of interest, conflict of interest records and related governance information;
- 2.3.8 due diligence, verification, background, sanctions, conflict, fit and proper or compliance information, where lawful and necessary;
- 2.3.9 information contained in board, shareholder, ARC, REMCO, Social, Ethics and Transformation Committee, governance, compliance, audit, risk, remuneration, transformation, legal, tax, finance, transaction and investment records;
- 2.3.10 records relating to PAIA requests, POPIA requests, complaints, disputes, investigations, litigation or regulatory enquiries; and
- 2.3.11 website, e-mail, electronic communication, access control, IT security and audit trail information, to the extent applicable.

### **2.4 Purposes for Processing Personal Information:**

- 2.4.1 maintaining statutory company records and complying with company law obligations;

- 2.4.2 maintaining shareholder, beneficial owner, director, prescribed officer and committee member records;
- 2.4.3 facilitating board, shareholder and committee meetings, including preparation and retention of notices, agendas, packs, minutes and resolutions;
- 2.4.4 supporting corporate governance, risk management, audit, remuneration, transformation, compliance and group oversight functions;
- 2.4.5 assessing, managing and monitoring investments, subsidiaries, transactions and group structures;
- 2.4.6 conducting due diligence, verification checks and compliance screening where required or reasonably necessary;
- 2.4.7 appointing, instructing and managing advisers, consultants, independent contractors, suppliers and service providers;
- 2.4.8 complying with tax, accounting, audit, statutory, regulatory, governance and legal obligations;
- 2.4.9 maintaining financial, accounting, audit, tax, supplier and payment records;
- 2.4.10 managing legal claims, disputes, investigations, regulatory enquiries and legal professional privilege, where necessary;
- 2.4.11 maintaining information security, access control, business continuity and records management processes;
- 2.4.12 considering reports, summaries or information submitted by subsidiaries for group governance and oversight purposes;
- 2.4.13 responding to PAIA, POPIA and other lawful requests;
- 2.4.14 communicating with shareholders, directors, committee members, subsidiaries, advisers, regulators, suppliers, service providers and other stakeholders; and
- 2.4.15 performing any other lawful processing that is necessary for the Company's legitimate governance, investment, statutory, compliance, legal, tax, audit, risk, remuneration, transformation or oversight functions.
- 2.4.16 Lawful basis for Processing

2.4.16.1 The Company Processes Personal Information only where one or more of the justifications in section 11(1) of POPIA applies, namely: (a) Processing is necessary to comply with an obligation imposed by law on the Company, including under the Companies Act, the Income Tax Act, the Tax Administration Act, PAIA and POPIA; (b) Processing is necessary for the conclusion or performance of a contract to which the Data Subject is a party; (c) Processing is necessary for pursuing the legitimate interests of the Company, a Group Company or a third party to whom the information is supplied, including the Company's governance, investment, compliance, audit, risk and oversight functions; or (d) the Data Subject has consented to the Processing. Where the Company relies on consent, the Data Subject may withdraw that consent at any time, subject to any legal or contractual restriction and reasonable notice.

### **3 PERSONAL INFORMATION/PERSONAL DATA FOR DIRECT MARKETING PURPOSES**

- 3.1 The Company does not ordinarily conduct direct marketing activities in the same manner as an operating company that markets goods or services to consumers.
- 3.2 If the Company undertakes any direct marketing, stakeholder communication or investor communication that constitutes direct marketing under POPIA, it will do so only where permitted by law and subject to any required opt-out, consent or other lawful basis.

### **4 SHARING OF PERSONAL INFORMATION**

- 4.1 The Company may share Personal Information with Group Companies, directors, committee members, shareholders, professional advisers, consultants, auditors, tax advisers, legal advisers, suppliers, service providers, financiers, transaction counterparties, insurers, regulators, public bodies, courts, tribunals and other persons where lawful and necessary for the purposes described in this Policy.
- 4.2 Where the Company receives information relating to a subsidiary's employees, customers, suppliers or operations, the Company will generally Process that information only to the extent required for governance, reporting, oversight, transaction, legal, compliance, audit, risk, remuneration, transformation or statutory

purposes.

- 4.3 The Company will not sell Personal Information and will not share Personal Information with third parties for unrelated purposes.

## **5 OPERATORS AND SERVICE PROVIDERS**

- 5.1 Where required under POPIA, the Company seeks to ensure that appropriate written agreements or contractual provisions are in place with Operators or service providers who Process Personal Information on behalf of the Company.
- 5.2 Such arrangements shall, where appropriate, address confidentiality, security safeguards, lawful Processing, access control, retention, deletion, breach notification and restrictions on unauthorised further Processing

## **6 STORAGE AND RETENTION OF PERSONAL INFORMATION**

- 6.1 The Company will retain Personal Information only for as long as reasonably necessary for the purpose for which it was collected or subsequently Processed, unless a longer retention period is required or permitted by law.
- 6.2 Retention periods may be determined with reference to statutory company records, tax and accounting requirements, audit requirements, board and committee governance needs, limitation periods, legal holds, transaction requirements, regulatory obligations and legitimate business requirements.
- 6.3 Where Personal Information is no longer required, the Company will take reasonable steps to securely delete, destroy, de-identify or archive the information, subject to applicable legal, governance and records management requirements.
- 6.4 Without limiting the above, the Company generally retains: company and statutory records for the periods prescribed by the Companies Act 71 of 2008 and its regulations; accounting, tax and supporting records for at least five years as contemplated in section 29 of the Tax Administration Act 28 of 2011; and records relevant to actual or anticipated litigation, regulatory enquiries or legal holds for as long as those matters remain live, together with any applicable prescription period.

## **7 FAILURE TO PROVIDE PERSONAL INFORMATION**

- 7.1 Where the Company requires Personal Information to meet a statutory, governance, legal, contractual, compliance, tax, audit, transaction or legitimate business purpose, failure to provide such information may prevent the Company from engaging with the relevant Data Subject or stakeholder, processing a request, entering into or

performing an agreement, making payment, completing a transaction, meeting regulatory obligations or fulfilling governance requirements.

## **8 SECURING PERSONAL INFORMATION**

- 8.1 The Company will always implement appropriate, reasonable, physical, organisational, contractual and technological security measures to secure the integrity and confidentiality of Personal Information, including measures to protect against the loss or theft, unauthorised access, disclosure, copying, use or modification of Personal Information in compliance with Applicable Laws.
- 8.2 In further compliance with Applicable Laws, the Company will take steps to notify the relevant Regulator(s) and/or any affected Data Subjects in the event of a security breach and will provide such notification as soon as reasonably possible after becoming aware of any such breach.
- 8.3 Notwithstanding any other provisions of this Policy, it should be acknowledged that the transmission of Personal Information, whether it be physically in person, via the internet or any other digital data transferring technology, is not completely secure. Whilst the Company has taken all appropriate, reasonable measures to secure the integrity and confidentiality of the Personal Information its Processes, in order to guard against the loss of, damage to or unauthorised destruction of Personal Information and unlawful access to or processing of Personal Information, the Company in no way guarantees that its security system(s) are 100% secure or error-free. Therefore, the Company does not guarantee the security or accuracy of the information (whether it be Personal Information or not) which it collects from any Data Subject.
- 8.4 Any transmission of Personal Information will be solely at the own risk of a Data Subject. Once the Company has received the Personal Information, it will deploy and use strict procedures and security features to try to prevent unauthorised access to it. As indicated above, the Company reiterates that it restricts access to Personal Information to Third Parties who have a legitimate operational reason for having access to such Personal Information. The Company also maintains electronic and procedural safeguards that comply with the Applicable Laws to protect your Personal Information from any unauthorised access.
- 8.5 Nothing in this Policy limits or excludes any duty imposed on the Company by POPIA, or any right or remedy available to a Data Subject under POPIA, including the right to institute civil proceedings in terms of section 99 of POPIA.

## **9 TRANSFER OF PERSONAL INFORMATION OUTSIDE OF SOUTH AFRICA**

- 9.1 The Company may transfer Personal Information outside South Africa where necessary for governance, group reporting, IT hosting, advisory, transaction, legal, audit, tax, compliance or other legitimate purposes.
- 9.2 The Company will seek to ensure that any cross-border transfer complies with POPIA, including by relying on an applicable safeguard or lawful basis, such as adequate protection by law or agreement, consent, contractual necessity or another basis permitted under POPIA.

## **10 PERSONAL INFORMATION RECEIVED FROM THIRD PARTIES**

- 10.1 Where the Company receives Personal Information from a third party, the Company will take reasonably practicable steps, where required, to satisfy itself that the information has been lawfully collected and may lawfully be disclosed to and Processed by the Company. This may include obtaining appropriate warranties, confirmations or contractual undertakings from the third party.

## **11 ACCESS TO PERSONAL INFORMATION AND DATA SUBJECT RIGHTS**

- 11.1 A Data Subject may request confirmation of whether the Company holds Personal Information about them and may request access to such Personal Information, subject to PAIA, POPIA and any applicable grounds of refusal.
- 11.2 A Data Subject may request correction, deletion or destruction of Personal Information where the information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained, subject to applicable legal requirements.
- 11.3 Requests must be submitted to the Information Officer using the process described in the Company's PAIA Manual or any applicable form or process made available by the Information Regulator from time to time.

## **12 KEEPING PERSONAL INFORMATION/PERSONAL DATA ACCURATE**

- 12.1 The Company will take reasonable steps to ensure that Personal Information it Processes is accurate, complete and updated where reasonably necessary for the purpose for which it is Processed.
- 12.2 The Company expects Data Subjects and stakeholders to notify it in writing where their

Personal Information changes or where they believe information held by the Company is inaccurate, incomplete or outdated.

### 13 COSTS TO ACCESS PERSONAL INFORMATION

13.1 Where a fee is permitted under PAIA or POPIA, the prescribed or applicable fee may be charged for copies, reproduction, search, preparation or other access-related costs. The applicable process and fees are set out in Annexure C of the Company's PAIA Manual.

### 14 COMPLAINTS TO THE INFORMATION REGULATOR

14.1 If a Data Subject or other person believes that the Company has Processed Personal Information contrary to POPIA or this Policy, they are encouraged to contact the Company's Information Officer first so that the matter can be assessed and addressed where appropriate.

14.2 A person may also lodge a complaint with the Information Regulator using the forms, channels or processes made available by the Information Regulator from time to time.

|                         |                                                                                                                                          |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Regulator</b>        | Information Regulator (South Africa)                                                                                                     |
| <b>Physical address</b> | Woodmead North Office Park, 54<br>Maxwell Drive, Woodmead,<br>Johannesburg, Gauteng                                                      |
| <b>Postal address</b>   | PO Box 31533, Braamfontein,<br>Johannesburg, 2017                                                                                        |
| <b>Telephone</b>        | +27 10 023 5200 / +27 10 023 5207                                                                                                        |
| <b>Email / Website</b>  | <b>E-mail:</b> enquiries@inforegulator.org.za<br><b>Website:</b> <a href="https://inforegulator.org.za">https://inforegulator.org.za</a> |

### 15 CONTACTING US

All comments, questions, concerns or complaints regarding Personal Information or this Policy, should be forwarded to the Company's Information Officer at the following e-

mail liamh@dninvest.co.za.