

**PAIA & POPIA MANUAL**

**of**

**NOVUS HOLDINGS LIMITED  
(" Novus")**

**Registration number 2008/011165/06**

**In terms of Section 51 of the Promotion of Access to Information Act No. 2 of 2000  
As amended ("PAIA")**

**and**

**The Protection of Personal Information Act No.4 of 2013 as amended ("POPIA")**

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## 1. Introduction & Purpose

- 1.1 This Manual has been prepared in accordance with section 51 of the PAIA together with the applicable POPIA provisions, and its relevant Regulations and covers Novus Holdings Limited and its various subsidiaries.
- 1.2 Novus Holdings Limited (“Novus” or “the Group” or “the Company”) was incorporated in 2008 under the laws of the Republic of South Africa. Our principal operations are in print media, labels, flexible plastic packaging and education.
- 1.3 What started as a small family-run business over a century ago is now a public company listed on the Johannesburg Stock Exchange, and one of the largest printing, publishing and manufacturing operations in Southern Africa.
- 1.4 As part of Novus Holdings operations and services, it holds certain records, including personal information. The Promotion of Access to Information Act, 2 of 2000 (PAIA) and the Protection of Personal Information Act, 4 of 2013 (POPIA) creates certain duties and responsibilities for Novus Holdings regarding its records.
- 1.5 The aim of the Manual is to assist potential Requesters in requesting access to record as contemplated under PAIA, and to assist Data Subjects in exercising their rights under POPIA which includes access to its personal information, object to processing, and request the correction of any of its personal information held by Novus Holdings.
- 1.6 It should be noted that these rights of a Requester or a Data Subject are subject to certain conditions being met and in accordance with certain procedures and at prescribed fees, giving effect to the right of access to information and the right to privacy in accordance with the Constitution of the Republic of South Africa.
- 1.7 Requesters and Data Subjects are invited to contact the IO and/or the DIO, as set out in **paragraphs 3** below should they require any assistance in respect of the use or content of this Manual.

## 2. Definitions

- 2.1 The following words or expressions will bear the following meanings in this Manual:
  - 2.1.1 **“Controlled Entities/Related Entities”** means those Entities that are controlled by Novus Holdings, and any other legal entity that may from time to time be established and controlled by Novus Holdings;
  - 2.1.2 **“Data Subject”** means the person to whom personal information relates;
  - 2.1.3 **“Employee”** means a person, excluding an independent contractor, who works for Novus Holdings and who receives, or is entitled to receive, any remuneration, and any other person who in any manner assists in carrying on or conducting the business of Novus Holdings;
  - 2.1.4 **“Information Regulator”** Protection of Personal Information Act No. 4 of 2013 (“POPIA”);
  - 2.1.5 **“Manual”** means this PAIA and POPIA Manual, together with any annexures thereto;

- 2.1.6 **"Novus"** means Novus Holdings Limited and its various subsidiaries together with its group of companies and divisions (individually and collectively) ;
- 2.1.7 **"PAIA"** means the Promotion of Access to Information Act, 2 of 2000 together with any regulations published thereunder, as amended from time to time;
- 2.1.8 **"Personal Information"** has the meaning ascribed thereto under section 1 of POPIA;
- 2.1.9 **"Person"** means a natural or a juristic person;
- 2.1.10 **"POPIA"** means the Protection of Personal Information Act, 4 of 2013 as amended from time to time;
- 2.1.11 **"Processing"** shall bear the meaning ascribed thereto in section 1 of POPIA;
- 2.1.12 **"Record"** of, or in relation to, means any recorded information held by Novus Holdings regardless of form or medium and whether or not it was created by Novus Holdings;
- 2.1.13 **"Requester"** means any person, including, but not limited to, a public body or an official thereof, or any person acting on behalf of such a person requesting access to a record of Novus Holdings.
- 2.1.14 **"Responsible Party"** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

### 3. Key Contact Details for Access to Records and Information of Novus

Group Information Officer	
Chief Financial Officer & Information Officer	Craig Richard Wright
Email:	information.officer@novus.holdings

In terms of section 56 of POPIA the IO(s) has appointed the following Deputy Information Officer:

Group Deputy Information Officer	
Deputy Information Officer	Kim Deidre Julies
Email:	information.officer@novus.holdings

National or Head Office	
Street address:	10 Freedom Way, Milnerton, Western Cape,7441
Postal address:	PO Box 37014, Chempet, Western Cape, 7442
Telephone:	+27 21 550 2500
Websites:	<a href="https://novus.holdings/">https://novus.holdings/</a>
Email:	information.officer@novus.holdings

**4. Information Regulator of South Africa and its Guide on how to use PAIA and How to Obtain Access**

4.1 The Information Regulator compiled and issued a Guide on How to Use PAIA in accordance with section 10 of PAIA to enable a Requester to exercise any right contemplated in PAIA. This Guide is available on the Information Regulator’s [website](#) in all official languages.

4.2 Any queries regarding this Guide can be directed to:

The Information Regulator of South Africa

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

E-mail: [infoleg@justice.gov.za](mailto:infoleg@justice.gov.za)

Website: <https://www.justice.gov.za/infoleg/index.html>

Tel: 010 023 5200

**5. Records Held by Novus in accordance with PAIA**

**5.1 Description of Records Available without a Person having to Request Access**

5.1.1 The following records are automatically available to the general public and need not be requested in accordance with the procedure outlined in this Manual:

5.1.1.1 Information available on Novus’ website; <https://novus.holdings>

5.1.1.2 All records in the booklets and pamphlets published by Novus.

**5.2 Description of Records which are Available in terms of Any Other Legislation**

5.2.1 The below list contains some of the more frequent legislation that may require us to keep records. Unless disclosure is prohibited in terms of the legislation, regulations, contractual agreements or otherwise, these records shall be available for inspection in terms of the requirements and conditions of the Act, should such interested parties be entitled to such information. Access should be requested in accordance with the prescriptions of the Act.

Applicable Legislation	Category of Records
Basic Conditions of Employment Act 57 of 1997	<ul style="list-style-type: none"> <li>• Each employee’s name and occupation</li> <li>• Time worked by each employee</li> <li>• Remuneration paid to each employee</li> <li>• all other records required by the Act.</li> </ul>
Broad-based Black Economic Empowerment Act 53 of 2003	B-BEE Certificate and other records and codes.

Companies Act 71 of 2008	<ul style="list-style-type: none"> <li>• Documents of Incorporation</li> <li>• Memorandum of Incorporation</li> <li>• Minute books, general and special resolutions passed at any meeting of Shareholders of the Company or any class of Shareholders</li> <li>• Register of Members / Shareholders / Directors / Company Secretary / Public Officers</li> <li>• Annual Financial Statements</li> <li>• All other records required by the Act</li> </ul>
Compensation for Occupational Injuries and Diseases Act 130 of 1993	The register or other record of the earnings and other prescribed particulars of all employees, for example, wages paid, time worked and payment made for piecework and overtime
Competition Act 89 of 1998	<ul style="list-style-type: none"> <li>• Financial records</li> <li>• Corporate records</li> <li>• Contracts and agreements</li> <li>• Marketing and sale records</li> <li>• Employee records</li> </ul>
Consumer Protection Act 68 of 2008	<ul style="list-style-type: none"> <li>• Transaction records</li> <li>• Product information</li> <li>• Contracts and agreements</li> <li>• Marketing and advertising records</li> <li>• Complaint and resolution records</li> </ul>
Electronic Communications and Transactions Act 25 of 2002	<ul style="list-style-type: none"> <li>• Electronic transaction records</li> <li>• Contracts and agreements</li> <li>• Communication records</li> <li>• Security and authentication records</li> <li>• Intellectual property records</li> </ul>
Employment Equity Act 55 of 1998	<ul style="list-style-type: none"> <li>• Employment Equity Plan</li> <li>• Workforce Profile</li> <li>• All other records required by the Act</li> </ul>
Financial Intelligence Centre Act 38 of 2001	<ul style="list-style-type: none"> <li>• Client identification and verification records</li> <li>• Transaction records</li> <li>• Employee training records</li> <li>• Account records</li> <li>• Internal and external audit records</li> </ul>
Hazardous Substances Act, No. 15 of 1973	<ul style="list-style-type: none"> <li>• Product information</li> <li>• Storage and handling records</li> <li>• Waste disposal records</li> </ul>

Health Act No. 63 of 1977	<ul style="list-style-type: none"> <li>• Health and safety policies</li> <li>• Workplace safety records</li> <li>• Training records</li> </ul>
Income Tax Act 58 of 1962	<ul style="list-style-type: none"> <li>• All ledgers, cash books, journals, cheque books, bank statements, deposit slips, pay cheques, invoices, stock lists and all other books of account</li> <li>• Signed copy of Annual Financial Statements</li> <li>• Books of Account recording information required by the Companies Act</li> <li>• Invoices - issued and received</li> <li>• All other records required by the Act</li> </ul>
Labour Relations Act 66 of 1995	<ul style="list-style-type: none"> <li>• All records required in compliance with any collective agreement, arbitration award or determination</li> <li>• All records of the prescribed details of any strike, lock-out or protest action involving the Company's employees</li> <li>• All disciplinary records</li> <li>• All other records required by the Act</li> </ul>
Occupational Health and Safety Act 85 of 1993	<ul style="list-style-type: none"> <li>• A copy of the Act</li> <li>• An incident register certificate of compliance (in respect of all electrical installations)</li> <li>• First Aid certificate (valid for 3 years)</li> <li>• All other records required by the Act</li> </ul>
Promotion of Access to Information Act 2 of 2000	PAIA Manual
Protection of Personal Information Act 4 of 2013	<ul style="list-style-type: none"> <li>• Data processing records</li> <li>• Privacy policies and notices</li> <li>• Data breach incident records</li> <li>• Retention records</li> <li>• Training records</li> <li>• Consent records</li> <li>• Data processing agreements</li> </ul>
Skills Development Act 97 of 1998	<ul style="list-style-type: none"> <li>• Annual training reports and the annual training plan.</li> <li>• All other records required by the Act</li> </ul>
Skills Development Levy Act 9 of 1999	<ul style="list-style-type: none"> <li>• Training records</li> <li>• Training plans and reports</li> <li>• Employment equity plans and reports</li> <li>• Learnership records</li> <li>• Employee records</li> </ul>

Trade Marks Act 194 of 1993	<ul style="list-style-type: none"> <li>• Trademark registration records</li> <li>• Trademark renewal records</li> <li>• Trademark assignment and licensing records</li> </ul>
Unemployment Insurance Act 30 of 1966	Records detailing the contributions employed by the employer in respect of earnings paid, time worked, payments made for piece work and overtime
Value Added Tax Act 89 of 1991	<ul style="list-style-type: none"> <li>• Books of account</li> <li>• documents recording the supply of goods to or by the vendor</li> <li>• invoices</li> <li>• tax invoices</li> <li>• credit and debit notes</li> <li>• bank statements</li> <li>• deposit slips</li> <li>• stock lists</li> <li>• paid cheques</li> <li>• All other records required by the Act</li> </ul>

**5.3 Description of the Subjects on which Novus holds Records and Categories of Records held on each Subject by Novus.**

**5.3.1** In addition to the information available as described under PAIA, Novus maintains records, including but not limited to the subjects and the related categories of record set out below

<b>Subjects in which the body holds records</b>	<b>Categories of records</b>
Administration	<ul style="list-style-type: none"> <li>• Correspondence</li> <li>• Licenses</li> <li>• Minutes of Management meetings</li> <li>• Minutes of staff meetings</li> </ul>
Client Records	<ul style="list-style-type: none"> <li>• Clients' files</li> <li>• Client Mandates – records and evidence</li> <li>• Billing information</li> </ul>
Communication	<ul style="list-style-type: none"> <li>• Correspondence with clients</li> <li>• Correspondence to persons outside of the company</li> </ul>
Financial Information	<ul style="list-style-type: none"> <li>• Accounting Records</li> <li>• Annual Financial Statements</li> <li>• Asset Register</li> <li>• Banking details</li> <li>• Bank Statements</li> <li>• Inventory records</li> <li>• Vouchers</li> <li>• Tax returns</li> <li>• VAT returns</li> <li>• Returns related to employee taxes</li> </ul>



Governance	<ul style="list-style-type: none"> <li>• List of directors</li> <li>• Minute books and resolutions</li> <li>• Power of attorney agreements</li> <li>• Share register</li> <li>• Shareholder’s agreements</li> <li>• Statutory registers</li> <li>• Incorporation forms</li> <li>• Memorandum and articles of association</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>• Disciplinary records</li> <li>• Employee code of conduct</li> <li>• Employee contracts</li> <li>• Personnel files</li> <li>• Remuneration records and policies</li> <li>• Staff recruitment policies</li> <li>• Training records and material</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>• Computer software support and maintenance agreements</li> <li>• Software license agreements</li> <li>• Agreements in respect of hardware</li> <li>• Agreements with internet service providers</li> </ul>
Marketing and Events	<p>Event Information: Details of conferences, seminars, workshops.  Marketing Materials: Brochures, promotional material, advertising records.</p>
Operations	<ul style="list-style-type: none"> <li>• Firm policies</li> <li>• Production records</li> <li>• Register of clients</li> <li>• Agreements with suppliers</li> <li>• Agreements with service providers</li> </ul>
Publications and Research	<ul style="list-style-type: none"> <li>• Newsletters, journals, reports, and other publications produced.</li> <li>• Research papers, studies, surveys conducted</li> </ul>
Stakeholder Communications	<ul style="list-style-type: none"> <li>• Releases: Media statements, press releases, public announcements</li> <li>• Correspondence: Communications with members, regulators, the public.</li> </ul>
Supplier And Services Records	<ul style="list-style-type: none"> <li>• Agreements with service providers</li> <li>• Agreements with suppliers</li> </ul>

#### 5.4 Requests for Access to Records – PAIA

5.4.1 Requests for access to records of Novus by a Requester are subject to the provisions of PAIA. Requests must be made on the prescribed form attached hereto and marked **Annexure ‘B’**. A Requester must:

5.4.1.1 Address the request to the IO and DIO via the contact details set out in **paragraphs 3** above;

5.4.1.2 Provide sufficient particulars to enable the IO and DIO to identify the Requester and the record or records requested;

5.4.1.2.1 Clearly indicate the desired form of access (e.g., electronic copy, hardcopy, physical inspection);

- 5.4.1.2.2 Specify the telephone number, cell phone number, email address, physical and postal address of the Requester in the Republic;
- 5.4.1.2.3 Identify the right the Requester is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercising or protection of that right;
- 5.4.1.2.4 if the request is made on behalf of a person, to submit proof of the capacity in which the Requester is making the request, to the reasonable satisfaction of the IO and DIO.
- 5.4.1.3 On receipt of the request for access to personal information, the IO or DIO will notify the Requester of the prescribed request fee, if any, before processing the request.

#### 5.5 Prescribed Fees in respect of Private Bodies

- 5.5.1 The prescribed fees for requests to private bodies are available on the website of the Information Regulator at [www.inforegulator.org.za](http://www.inforegulator.org.za) and the website of the Department of Justice and Constitutional Development at [www.justice.gov.za](http://www.justice.gov.za).

#### 5.6 Requests for Access to Personal Information - POPIA

- 5.6.1 Requests for confirmation by a Data Subject, as to whether or not Novus holds personal information related to the Data Subject, shall be governed by POPIA and shall be free of charge.
- 5.6.2 Requests for access to confirmed personal information about the Data Subject, including information about the identity of all third parties, or categories of third parties, who have, or have had access to the personal information, shall be governed by POPIA.
- 5.6.3 The Data Subject has the right to request from Novus the record or a description of the personal information about the Data Subject held by Novus, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.
- 5.6.4 Requests must be made on the prescribed form attached hereto and marked **Annexure 'B'**. A Data Subject must:
  - 5.6.4.1 Address the request to the IO and DIO via the contact details set out in **paragraphs 3** above; and
  - 5.6.4.2 Provide sufficient particulars to enable the IO and DIO to identify the Data Subject and the record or the personal information requested.
- 5.6.5 On receipt of the request for access to personal information, the IO or DIO will in writing notify the Data Subject of the prescribed request fee, if any, before processing the request or may require the Data Subject to pay a deposit to enable Novus to respond to the request.

## 6. Decision on Request for Access to a Record or Personal Information in accordance with PAIA and POPIA

- 6.1 The IO must, as soon as reasonably possible, but in any event within 30 days from date of receipt or after the particulars required have been received decide whether or not to grant the request.
- 6.1.1 The IO may decide to extend the period of 30 days for another period of not more than 30 days if:
- 6.1.1.1 the request is for a large number of records or requires a search through a large number of records, and compliance with the initial period would be unreasonably interfere in Novus activities;
- 6.1.1.2 the request requires a search for records in, or collection thereof from, an office of Novus situated not in the same town or city of the Novus Head Office that cannot be reasonably be completed in the initial period;
- 6.1.2 The IO must, as soon as reasonably possible, but in any event within 30 days, after the request is received, notify the Requester or Data Subject of an extension, the period of the extension and the reasons for the extension including the provisions of PAIA relied upon, and that the Requester or Data Subject may lodge a complaint to the Information Regulator or an application with a court against the extension, and the procedure (including the period) for lodging the application.
- 6.1.3 An IO must grant a request for access to a record or personal information of Novus if the disclosure of the record or personal information would reveal evidence of a substantial contravention of, or failure to comply with, the law, or imminent and serious public safety or environmental risk, and the public interest in the disclosure of the record clearly outweighs the harm a refusal in accordance with Chapter 4 of Part 3 of the PAIA.
- 6.1.4 The IO when considering the request for access to a record or personal information, which might be a record or personal information in terms of which a request for access may or must be refused in accordance with the applicable sections of Chapter 4 of Part 3 of the PAIA, take all reasonable steps to inform a third party to whom or which the record or personal information relates to of the request in the prescribed form. The IO must notify the third party in writing as soon as reasonably possible, but in any event within 21 days after the request for access is received and by the fastest means possible. The IO's notification must state that the request for access is being considered and the record or personal information may be a record or personal information in accordance with the relevant sections of Chapter 4 of Part 3 of the PAIA, indicate the requester's name, mandatory disclosure if applicable, and indicate that the third party may within 21 days after the notification make a written or oral representation to the IO why the request for access should be refused, or give written consent for the disclosure of the record or information to the Requester.
- 6.1.5 The IO must notify the Requester or Data Subject of the decision in the manner indicated by the Requester or Data Subject. The notification shall indicate the access fee, if any, to be paid upon access, the form in which it will be given and advise the Requester or Data Subject that a complaint may be lodged with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint to the Information Regulator or the application.

- 6.1.6 Should Novus grant the request, it must provide the record or information the Requester or Data Subject reasonably requires within a reasonable time, at a prescribed fee, if any, in a reasonable manner and format if no specific form of access was required, and in a form that is generally understandable. The Data Subject must be advised in the response to the request of the right to request the correction of personal information.
- 6.1.7 Should the request for access to a record or personal information be refused, the notice must state:
  - 6.1.7.1 adequate reasons for the refusal, including the provisions of this PAIA relied on;
  - 6.1.7.2 exclude, from any such reasons, any reference to the content of the record; and
  - 6.1.7.3 state that the Requester or Data Subject may lodge a complaint to the Information Regulator an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint to the Information Regulator or the application.

## **7. Grounds for Refusal of a Request for Access to a Record or Personal Information in accordance with PAIA and POPIA**

- 7.1 Novus may or must refuse to disclose any record or personal information to which the grounds of refusal of access to the record or personal information is set out in the applicable sections of Chapter 4 of Part 3 of the PAIA apply.
- 7.2 Failure by the IO to notify the Requester or Data Subject of the decision regarding the request to access to a record or personal information within the prescribed period, the IO would be regarded as having refused the request.

## **8. Processing of Personal Information in accordance with POPIA**

- 8.1 Novus in its capacity as a Responsible Party requires personal information relating to Data Subjects to carry out its business operations and activities.
- 8.2 Novus has a duty and responsibility to ensure that the conditions of lawful processing in accordance with POPI, and all the measures that give effect to such conditions, are complied with at the time of the determination of the purpose and means of the processing of personal information and during the processing itself.
- 8.3 Novus must:
  - 8.3.1 process personal information lawfully and in a reasonable manner that does not infringe on the right to privacy of the Data Subject;
  - 8.3.2 have a lawful purpose for processing the personal information;
  - 8.3.3 collect personal information directly from a Data Subject, unless prescribed otherwise;
  - 8.3.4 collect personal information for a specific, explicitly defined, and lawful purpose related to the functions or activities of Novus;

- 8.3.5 take reasonably practicable steps to ensure that the Data Subject is aware of the personal information being collected;
- 8.3.6 only process personal information for the purpose it was collected, and only further process the personal information if the further processing purpose is compatible to the initial purpose;
- 8.3.7 not retain personal information any longer than is necessary for achieving the purpose for which the personal information was collected or subsequently processed, unless prescribed otherwise;
- 8.3.8 take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary, this includes having regard for the purpose for which personal information is collected or further processed;
- 8.3.9 maintain the documentation of all processing operations under its responsibility as referred to in section 51 of PAIA;
- 8.3.10 secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent loss of damage to or unauthorised destruction of personal information, and unlawful access to or processing of personal information.
- 8.3.11 processed personal information in accordance with the rights of Data Subjects, where applicable.

**8.4 Purpose of Processing Personal Information:**

- 8.4.1 Novus collects, processes, and stores personal information for the primary purpose of fulfilling its duties in terms of any agreement concluded with our customers, employees and suppliers.
- 8.4.2 This includes, but is not limited to, developing and/or improving products offered to our customers, conducting market research, statistical analysis and making strategic business decisions, marketing any products or offerings to customers which may be of interest to them; Complying with Occupational Health and Safety laws when Data Subjects are on Novus Holding’s premises; Testing various IT system and application changes and managing employee training and Managing our relationship with Novus Holdings employees and suppliers, service providers and third parties for operational reasons.

**8.5 Categories of Data Subjects and their Personal Information Novus Processes**

Categories of Data Subjects	Personal Information that may be processed
Business partners that Novus Holdings partner with for delivering certain products	Name, registration number, contact details, cashbacks, CCTV footage

Clients of Novus	Name, ID or registration number, address, financial information, credit check results, health information, application form, policy documents, VAT number, tax number, tax certificates, CCTV footage, call recordings, vehicle, and driver registration information, payment records, policy information, contact person information if the client is a juristic person.
Contractors at Novus	Name, surname, physical address, registration number, financial information, contract, contractor name, ID number of contractors, CCTV footage, vehicle and driver registration information, biometric information.
Employees of Novus	Name, ID number, physical address, health information, disability information, employee benefit information, bank details, tax number, letter of appointment, vehicle registration information, performance records, payslips, training records, CV, records of qualifications, psychometric assessment results, credit check results, criminal record check results, CCTV footage, next of kin information, beneficiary information, biometric information and photos.
Suppliers and Vendors of Novus	Names of contact persons; name of entity; name of directors and shareholders, physical and postal address, and contact details (contact number(s), fax number, email address); financial information; registration number; founding documents; tax related information; authorised signatories, broad-based black economic empowerment (B-BBEE) status, affiliates entities, business strategies.
Third parties with whom Novus Holdings conduct business services with	Name, registration number, financial information, contract details, CCTV footage.

8.6 Recipients to whom the Personal Information may be supplied to by Novus:

8.6.1 Novus may supply Personal Information to its Employees to perform their duties and responsibilities.

8.6.2 Novus may supply the Personal Information to the Service Providers who render services, including but not limited to, partnerships, and other engagements as mentioned below:

8.6.2.1 Capturing and organising of Personal Information;

8.6.2.2 Storing of Personal Information;

8.6.2.3 Sending of correspondences, including emails and other correspondence;

8.6.2.4 Conducting due diligence checks;

8.6.2.5 Conducting qualifications verifications;

8.6.2.6 Conducting criminal checks;

8.6.2.7 Administration of payroll, PAYE, UIF, Pension Fund and Medical Aid;

8.6.2.8 ICT Infrastructure;

8.6.2.9 Facilitation of Training;

8.6.3 Novus may also supply the Personal Information to:

8.6.3.1 any Regulatory authorities, government authorities, industry ombudsmen and local and international tax authorities; and

8.6.3.2 any other Authorities, in respect of any matter or part thereof, that falls under their jurisdiction; law enforcement agencies, such as the National Prosecuting Authority or South African Police Service, for criminal investigation; and to Courts etc.

8.7 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information:

8.7.1 Novus continuously establishes and maintains appropriate, reasonable technical and organisational measures by taking appropriate, reasonable technical and organisational measures to prevent:

8.7.1.1 Loss of, damage to or unauthorised destruction of Personal Information; and

8.7.1.2 Unlawful access to or processing of Personal Information.

8.7.2 Novus has taken reasonable measures to:

8.7.2.1 identify all reasonably foreseeable internal and external risks to Personal Information in its possession or under its control;

8.7.2.2 establish and maintain appropriate safeguards against the risks identified;

8.7.2.3 regularly verify that the safeguards are effectively implemented; and

8.7.2.4 ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

8.7.3 Novus prioritises the security of Personal Information and have taken the following measures, including but not limited to:

8.7.3.1 Access Control, including physical and electronically;

8.7.3.2 Anti-virus, anti-malware solutions and firewalls;

8.7.3.3 Awareness and training;

8.7.3.4 Data Backups on a regular basis;

- 8.7.3.5 Data Encryption protocols;
- 8.7.3.6 Technical Measures: Firewalls, encryption protocols, secure databases, and regular system backups;
- 8.7.3.7 Monitoring: Continuous monitoring of systems to detect and address any security breaches.
- 8.7.3.8 Operator and Data sharing agreements and clauses, including vetting of third-party providers;
- 8.7.3.9 Policies & Procedures, including but not limited to data governance and protection policies, and related procedures and guidelines and protocols for data handling, storage, and processing; and
- 8.7.3.10 Secured Data Bases.

## 8.8 Transfer of Personal Information Outside of South Africa

- 8.8.1 Novus may from time to time need to transfer Personal Information across border for the following purposes, which includes but are not limited to the purpose of rendering services to its clients, stakeholders, and administration purposes.
- 8.8.2 Should it become necessary to transfer Personal Information to another country for any lawful purposes, Novus will ensure that the party to whom the Personal Information is transferred is bound by laws, regulations, binding corporate rules or binding agreements which provides adequate level of protection, and the third party agrees to treat that Personal Information with the same level of protection as Novus is obliged to under POPIA. In carrying out any cross-border transfers, Novus shall adhere to the provisions of POPIA.
- 8.8.3 Should it be necessary to obtain a Data Subject's consent to transfer their Personal Information outside of South Africa, Novus shall take reasonably practicable steps to obtain a Data Subject's consent.
- 8.8.4 Should Novus not be able to obtain such a consent, the Personal Information will only be transferred outside of South Africa if:
  - 8.8.4.1 It will be for the Data Subject's benefit; and
  - 8.8.4.2 The Data Subject would have given consent should it have been reasonably practicable to obtain such consent.

## 9. Other Data Subject's Rights in accordance with POPIA

### 9.1 Notification of Collection of Personal Information

A Data Subject has a right to be notified when Personal information is collected through reasonably practicable steps and in the prescribed manner and format.

### 9.2 Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information



9.2.1 A Data Subject may request for their Personal Information to be corrected/deleted in the prescribed Form **Annexure 'C'** attached to this manual, subject to the provisions of POPIA.

### 9.3 Object to Processing

A Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed Form **Annexure 'D'** attached to this manual, subject to exceptions contained in POPIA.

### 9.4 Withdrawal of Consent

A Data Subject may withdraw the consent at any time by submitting the completed prescribed form, subject to any exceptions, and provided that the lawfulness of the processing of personal information before such withdrawal will not be affected. Refer to **Annexure 'E'** to this Manual for the prescribed form. The completed form together with the relevant supporting documentation and information must be submitted to the IO.

### 9.5 Notification of Unauthorised Access to or Acquiring of Personal Information

9.5.1 Should Novus have reasonable grounds to believe that the personal information of a Data Subject has been accessed or acquired by any unauthorised person, Novus must notify the Information Regulator and a Data Subject, unless the identify of such a Data Subject cannot be established, in the prescribed manner as soon as reasonably possible after the discovery of the compromise. This will be subject to legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of Novus's information system.

## 10. Availability of the PAIA and POPIA Manual

10.1 Novus's Manual and its relevant annexure are made available in English. A copy of the Manual and annexures are available:

- 10.1.1 on the Novus website at <https://novus.holdings/>
- 10.1.2 at the head office of Novus for public inspection during normal business hours;
- 10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 10.1.4 to the Information Regulator upon request.

## 11. Disposal of Records and Information in accordance with PAIA and POPI

- 11.1 Novus reserves the right to lawfully dispose of certain records in accordance with applicable laws and regulations.
- 11.2 Requesters will be advised whether a particular record has been disposed of where this is relevant to the records requested.

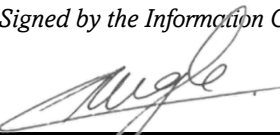
## 12. Approval and Effective Date

This Manual shall be approved by the Information officer and shall come into immediate effect from the date of approval, in conjunction with existing processes and procedures.

### 13. Review of Manual

- 13.1 Information officer review and update, where necessary, the Manual on an annual basis to determine whether a review is required, in order to ensure that the terms are current, fair, and representative of relevant corporate and industry conditions. Such assessment needs to be submitted and approved by Information officer.
- 13.2 The Manual may be amended from time to time and as soon as any amendments have been affected, the latest version of the Manual will be published and distributed in accordance with PAIA.

### MANUAL SIGN-OFF AND OWNERSHIP DETAILS

Manual Title	PAIA & POPI Manual
Version	2.0
Approval Date	05 September 2024
Next review date	05 September 2027
Related Legislation Applicable	Promotion of Access to Information Act, Protection of Personal Information Act, Constitution of the Republic of South Africa
Related Policies, Procedures, Guidelines, Standards, Frameworks	Data & Information Governance Policy
Replaces	PAIA Manual (2019)
Manual Owner	Compliance Officer
Application	Novus Holdings Limited and its various subsidiaries together with its group of companies and divisions (individually and collectively) ;, their respective employees, and relevant Stakeholders
Status	Approved
<p>Sign-off:</p> <p>The following party is a signatory to the content of this manual:</p> <p><i>Signed by the Information Officer</i></p>  <p><b>Information Officer</b>  <b>Date:</b> 05/09/2024</p>	

### Revision History

Version	Date	Revision Description & Summary of Changes (for audit trail purposes)	Manual Owner
[2.0]	[05:09:2024]	[Major Revision: Legislative amendment (Approval required)]	Information officer
[1.1]	[04:09:2024]	[Minor Amendments]	Information Officer
1.0	29:08:24	First draft: new manual	Compliance Officer

**End of Manual**

**14. ANNEXURE 'A' – Request for a Copy of the Guide**

**FORM 1  
REQUEST FOR A COPY OF THE GUIDE**

[Regulations 2 and 3: GNR.757 of 27 August 2021: Regulations relating to the Promotion of Access to Information, 2021]

TO: \*The Information Regulator  
P.O Box 31533  
Braamfontein  
2017  
E-mail address: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)  
Tel Number: +27 (0)10 023 5200

**OR**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\*The information Officer

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):		Cellular:

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"/> Sepedi		<input type="checkbox"/> Sesotho	
<input type="checkbox"/> Setswana		<input type="checkbox"/> Siswati	
<input type="checkbox"/> Tshivenda		<input type="checkbox"/> Xitsonga	
<input type="checkbox"/> Afrikaans		<input type="checkbox"/> IsiXhosa	
<input type="checkbox"/> IsiNdebele			
<input type="checkbox"/> Isizulu			

Manner of collection (mark with "X"):

Personal Collection	Postal Address	Facsimile	Electronic Communication (please specify)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

\_\_\_\_\_

Signature of requester  
\*Delete whichever is not applicable

**15. ANNEXURE 'B' – Form 2: Request for Access to Record**

**FORM 2  
REQUEST FOR ACCESS TO RECORD  
[Regulation 7: GNR.757 of 27 August 2021: Regulations relating to the Promotion of Access to Information, 2021]**

Note:

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

To: The information Officer

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(Address)

E-mail address: \_\_\_\_\_

Fax number: \_\_\_\_\_

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

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

<b>PARTICULARS OF RECORD REQUESTED</b>	
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)	
Description of record or relevant part of the record:	
Reference Number, if available:	
Any further particulars of record:	
<b>TYPE OF RECORD</b> (Mark the applicable box with an "X")	
Record is in written or printed form	
Record comprises virtual images (This includes photographs, slides, video, recordings, computer-generated images, sketches, etc)	
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> (Mark the applicable box with an "X")	
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 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> (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body (including listening to record 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 Services 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  (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>	
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	
Indicate which right is to be exercised or protected:	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

**FEES**

- a) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- d) If you qualify for exception of the payment of any fee. Please state the reason for exception.

Reason:	

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

Postal address	Facsimile	Electronic communication (please specify)

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

Signature of requester/person on whose behalf request is made

.....

**FOR OFFICIAL USE**

Reference number:	
Request received by: (state rank, name and surname of information officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
Signature of information officer

**16. ANNEXURE ‘C’ – Form 2: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information**

**FORM 2  
REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT,2013 (ACT NO.4 OF 2013)  
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION,2018  
[Regulation 3: GNR.1383 of 14 December 2018: Regulations relating to the Protection of Personal Information]**

Note

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this form inadequate, submit information as an Annexure to this form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an “x”

**Request for**

<b>A</b>	<b>DETAILS OF THE DATA SUBJECT</b>
Name(s) and surname/registered name of data subject:	
Unique identifier/Identity Number:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax Number/E-mail address	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/registered name of responsible party:	
Residential, Postal, or business address:	





**17. ANNEXURE 'D' – Form 1: Objection to the Processing of Personal Information**

**FORM 1**

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2: GNR.1383 of 14 December 2018: Regulations relating to the Protection of Personal Information]**

Note:

1. Affidavit or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this form is inadequate, submit information as an Annexure as is applicable.
3. Complete as is applicable.

<b>A</b>	<b>DETAILS OF DATA SUBJECT</b>
Name(s) and Surname/registered name of data Subject	
Unique Identifier/Identity Number	
Residential, Postal, or business address:	
	Code (    )
Contact number(s)	
Fax number/E-mail address	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/Registered name of responsible party:	
Residential, postal, or business address	
	Code (    )
Contact number(s):	

Fax number/E-mail address	
<b>C</b>	<b>REASONS FOR OBJECTION IN TERMS OF SECTION 11(1) (d) to (F) (Please provide detailed reasons for the objection)</b>

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

\_\_\_\_\_

Signature of data subject/designated person

**18. ANNEXURE ‘E’ – Form: Data Subject Consent Withdrawal**

**DATA SUBJECT CONSENT WITHDRAWAL**

For privacy reasons and in certain circumstances, you may have the right to withdraw your Consent issued to Novus to collect, store and process your personal information for the purpose of fulfilling contractual duties, to comply with legal obligations, and/or for its legitimate interests, accordance to the provisions of the Protection of Personal Information Act, 4 of 2013, where applicable.

Should you wish to withdraw your consent, you are required to complete this Form to enable us to consider and process your request

On receipt of your request, Novus will balance your privacy rights and freedoms with the rights, freedoms and obligations of Novus and the public interest to have access to certain Personal Information related to you.

We will endeavour to respond to your request promptly, but in at least 30 (thirty) days, as follows:

- our confirmation of receipt of your request; or
- our receipt of any further information we may require from you to enable us to comply with your request.

Please note that, depending on the complexity and number of requests we may extend the period by a further 2 (two) months, of which we will inform you of such extension within 1 (one) month of your request.

Note that the information you provide in this form will merely be used for the purpose of identifying you and the personal information you are requesting and enabling us to respond to your request. The completion of this form is not mandatory for you to make your request, such will however assist us in processing your request efficiently.

**Section A: Details of Person Submitting the Withdrawal of Consent**

Full Name and Surname:	
Identity Number:	
Contact Telephone Number:	
Email Address:	
Physical Address:	
Member Number (if Applicable):	

**Section B: Are you the Data Subject:**

Please tick the appropriate box and peruse the instructions:

- Yes, I am the Data Subject.** I enclose herewith proof of my identity and physical address, please tick the boxes in terms of the proof:

- Identification document
- Passport
- Driver’s License
- Birth Certificate
- Utility Bill or Bank Statement, not older than 3 (three) months
- TV License or Local Authority Tax Bill reflecting my physical address, not older than 1 (one) year

- No, I am not the Data Subject.** I am acting on behalf of the Data Subject and enclose hereto proof of my identity, as well as the Data Subject, and a copy of the Data Subject’s written authority. (Please complete **Section C** hereof)

- My Documentation
- Identification document
- Passport
- Driver’s License
- Birth Certificate
- Utility Bill or Bank Statement, not older than 3 (three) months
- TV License or Local Authority Tax Bill reflecting my physical address, not older than 1 (one) year
- Written Mandate Signed by Data Subject
- Data Subject’s Documentation:
- Identification document
- Passport

- Driver’s License
- Birth Certificate
- Utility Bill or Bank Statement, not older than 3 (three) months
- TV License or Local Authority Tax Bill reflecting my physical address, not older than 1 (one) year

To enable us to prevent the processing of withdrawal of consent from people impersonating others, or improperly seeking to suppress legal information we need to verify the identity of the person on whose behalf the request is made.

We also need to ensure that we identify the correct data subject this request relates to. Please provide us with a certified photocopy of scanned image of one of both of the following:

- **Proof of Identity**  
Identity Document, Passport, Driving License or Birth Certificate.
- **Proof of Physical Address**  
Utility Bill or Bank Statement, not older than 3 (three) months; TV Licence or Local Authority Tax Bill reflecting your physical address, not older than 1 (one) year.

In the event in which we are not satisfied that you have proven your identity, we reserve the right to refuse to grant your request.

**Section C: Details of Data Subject (if different from Section A)**

Full Name and Surname:	
Identity Number:	
Contact Telephone Number	
Email Address:	
Physical Address:	
Member Number (if Applicable):	

**Section D: Describe the Consent you issued to Novus and what Information you Consented to be collected, used and processed.**

We need to ensure that we identify the correct data subject and exactly what consent you wish to withdraw. Please provide any relevant details you are of opinion would assist us in identifying the consent which you wish to withdraw:

**Section E: Reasons for your Withdrawal of your Consent**

Should you wish to withdraw your Consent, provide your reasons of your withdrawal:

**Section F: Declaration**

*Please note: any attempt to mislead Novus may result in prosecution.*

I, undersigned

---

(Name and Surname)

do hereby,

1. confirm that I have read and understood the terms of this Data Subject Consent Withdrawal Form;
2. consent to the processing of the personal information that I am submitting in this form and any personal information I may submit in further correspondence for purposes of processing this request, and where necessary my details may be shared with the supervisory authority;
3. consent to Novus taking reasonable steps and sharing my personal information in relation to this request with Controllers' and/or Processors' who obtained my personal information through Novus making such personal information public, to inform them of the consent Withdrawal;
4. certify that the information provided in this application is true, correct and within my personal knowledge; and that I'm authorised to submit this request;
5. understand that it is necessary to confirm my identify, and where applicable also the Data



Subject's Identity on whose behalf I am acting; and

6. it might be necessary to obtain more detailed information in order to locate the correct personal information.

7. confirm that I understand that Novus will not be able to process my request if this Form is not properly completed or incomplete.

\_\_\_\_\_

Signature

\_\_\_\_\_

Date:

**Supplementary Documentation Mandatory to this Data Subject Consent Withdrawal Form :**

- **Proof of your Identity (refer to Section B hereof);**
- **Proof of the Data Subject's Identity (if different to the above);**
- **If applicable, authority from the Data Subject wherein you are mandated to act on his/her behalf.**

Please address and return your completed form, together with the mandatory documentation to:

**The Novus Data Protection Officer**

**Physical Address:**

10 Freedom

Way,

Milnerton,

Western Cape,

7441

Email: [information.officer@novus.holdings](mailto:information.officer@novus.holdings)

Telephone Number: +27 21 550 2500