



PAIA MANUAL

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

To address the requirements of the
Protection of Personal Information Act,
4 of 2013

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Table Of Contents

1. Introduction	2
2. List Of Acronyms, Abbreviations, And Definitions	3
3. Interpretations	7
4. Purpose of PAIA Manual	8
5. Key Contact Details for Access to Information of Global Trolley (Pty) Ltd T/A Velocity Media	9
6. Guide on How to Use Paia and How to Obtain Access to the Guide	10
7. Categories of Records of Global Trolley (Pty) Ltd T/A Velocity Media which are Available without a Person having to Request Access (Records which are Automatically Available)	14
8. Description of the Records of Global Trolley (Pty) Ltd T/A Velocity Media which are Available in Accordance with any Other Legislation	15
9. Description Of The Subjects On Which The Body Holds Records And Categories Of Records Held On Each Subject By Global Trolley (Pty) Ltd T/A Velocity Media	18
10. Processing Of Personal Information	23
11. Records That Cannot Be Found Or Do Not Exist	30
12. Complaints to the Information Regulator	30
13. Availability Of The Manual	31
14. Updating Of The Manual	31

1. Introduction

- 1.1. **Policy Statement and Application:** It is Global Trolley (Pty) Ltd (Registration Number 2012/018126/07) t/a Velocity Media's (Velocity) policy to conduct its operations in compliance with all legal and regulatory requirements. This Manual regulates the access to information and records owned, held by, or otherwise under the control of Velocity and the release of any such information or records by any of Velocity's directors, officers, employees, agents, or anyone acting on Velocity's behalf.
- 1.2. **Objective:** The objectives of this Manual are to promote compliance with the provisions of the Promotion of Access to Information Act No. 2 of 2000 (as amended) and the Protection of Personal Information Act No. 4 of 2013.
- 1.3. **Background:** PAIA provides that a person may only request information in terms thereof if that information is required for the exercise or protection of a right. PoPIA provides that a Data Subject may, upon proof of identity, request the Responsible Party to confirm, free of charge, all the information it holds about the Data Subject and may request access to such information, including information about the identity of third parties who have or have had access to such information. PoPIA further provides that where the Data Subject is required to pay a fee for services provided to him/her/it the Responsible Party must provide the Data Subject with a written estimate of the payable amount before providing the service and may require that the requestor pay a deposit for all or part of the fee.

2. List Of Acronyms, Abbreviations, And Definitions

- 2.1. **Access fee:** A fee prescribed for the purposes of Section 22(6) or Section 54(6) of the Act as the case may be
- 2.2. **CEO:** Chief Executive Officer
- 2.3. **Consent:** Means voluntary, specific, and informed expression of will in terms of which a data subject agrees to the procession of his / her / their personal information
- 2.4. **Data subject:** The person to whom the personal information relates
- 2.5. **Deputy Information Officer (DIO):** The designated individual responsible for assisting the Information Officer with the PAIA Request
- 2.6. **Guide:** The guide on how to use PAIA by any person who wishes to exercise any right contemplated in the Promotion of Access to Information Act, No. 2 of 2000 (PAIA), as amended and the Protection of Personal Information Act, No 4. of 2013, as contemplated in Section 10 of PAIA
- 2.7. **Head:** In relation to a juristic person means the CEO or equivalent officer or any person duly authorised by that office or the person acting in such capacity
- 2.8. **Information Officer (IO):** In relation to a private body means the head of the private body as contemplated in Section 1 of the Promotion of Access to Information Act
- 2.9. **Information Regulator (IR):** Refers to the Information Regulator established in terms of Section 39 of the Protection of Personal Information Act, No. 4 of 2013
- 2.10. **Internal appeal:** Refers to an internal appeal to the relevant authority in terms of Section 74 of PAIA
- 2.11. **Minister:** Minister of Justice and Correctional Services
- 2.12. **PAIA:** Promotion of Access to Information Act No. 2 of 2000 (as Amended)
- 2.13. **Person:** Means a natural or juristic person

- 2.14. **Personal information:** Means information relating to an identifiable natural person, including, but not limited to -
- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person;
 - (b) information relating to the education or the medical, financial, criminal, or employment history of the person;
 - (c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assigned to the person;
 - (d) the biometric information of the person;
 - (e) the personal opinions, views, or preferences of the person;
 - (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - (g) the views or opinions of another individual about the person; and
 - (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person, but excludes information about an individual who has been dead for more than 20 years;
- 2.15. **POPIA:** Protection of Personal Information Act No. 4 of 2013
- 2.16. **Processing:** Means any operation or activity, or any set of operations, whether or not by automatic means, concerning personal information, including -
- (a) The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;
 - (b) Dissemination by means of transmission, distribution, or making available in any other form; or
 - (c) Merging, linking, blocking, degradation, erasure, deletion, or destruction of information.

- 2.17. **Private body:** Means -
- (a) a natural person who carries or has carried on any trade, business, or profession, but only in such capacity;
 - (b) a partnership which carries or has carried on any trade, business, or profession; or
 - (c) any former or existing juristic person; or
 - (d) a political party but excludes a public body.
- 2.18. **Public body:** Means -
- (a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
 - (b) any other functionary or institution when
 - (i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - (ii) exercising a public power or performing a public function in terms of any legislation;
- 2.19. **Record:** of, or in relation to, a public or private body, means any recorded information - (a) (b) (c) regardless of form or medium; in the possession or under the control of that public or private body, respectively; and whether or not it was created by that public or private body, respectively;
- 2.20. **Regulator:** Information Regulator
- 2.21. **Republic:** Republic of South Africa
- 2.22. **Request for access:** In relation to
- (a) a public body, means a request for access to a record of a public body in terms of section 11; or
 - (b) a private body, means a request for access to a record of a private body in terms of section 50;
- 2.23. **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;

- 2.24. **The Act:** Means the Promotion of Access to Information Act 2 of 2000 as amended, and includes any regulation made and in force in terms of section 92.
- 2.25. **The body:** Global Trolley (Pty) Ltd t/a Velocity Media
- 2.26. **Third-party:** In relation to a request for access to -
- (a) a record of a public body, means any person (including, but not limited to, the government of a foreign state, an international organisation, or an organ of that government or organisation) other than -
 - (i) the requester concerned; and
 - (ii) a public body; or
 - (b) a record of a private body, means any person (including, but not limited to, a public body) other than the requester, but, for the purposes of sections 34 and 63, the reference to 'person' in paragraphs (a) and (b) must be construed as a reference to 'natural person';
- 2.27. **Velocity:** Global Trolley (Pty) Ltd t/a Velocity Media.

3. Interpretations

- 3.1. Any reference to any statute, regulation, or other legislation shall be a reference to that statute, regulation, or other legislation as at the signature date, and as amended or substituted from time to time.
- 3.2. If any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this Manual.
- 3.3. Where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this document.
- 3.4. Where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day.
- 3.5. Any reference to days (other than a reference to business days), months, or years shall be a reference to calendar days, months, or years, as the case may be.
- 3.6. The use of the word "including" followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and the eiusdem generis rule shall not be applied in the interpretation of such general wording or such specific example/s.
- 3.7. Insofar as there is a conflict in the interpretation of or application of this Manual and the Act, the Act shall prevail.
- 3.8. This Manual does not purport to be exhaustive of or to comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarise his/her/itself with the provisions of the Act before lodging any request with the Regulator.

4. Purpose of PAIA Manual

This PAIA Manual is useful for the public to -

- 4.1. Check the categories of records held by Velocity that are available without a person having to submit a formal PAIA request;
- 4.2. Have a sufficient understanding of how to make a request for access to a record of Velocity, by providing a description of the subjects on which Velocity holds records and the categories of records held on each subject;
- 4.3. Know the description of the records of Velocity which are available in accordance with any other legislation;
- 4.4. Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 4.5. Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- 4.6. Know if Velocity will process personal information, the purpose of processing personal information, and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 4.7. Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 4.8. Know the recipients or categories of recipients to whom the personal information may be supplied;
- 4.9. Know if Velocity has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 4.10. Know whether Velocity has appropriate security measures to ensure the confidentiality, integrity, and availability of the personal information that is to be processed.

5. Key Contact Details for Access to Information of Global Trolley (Pty) Ltd T/A Velocity Media

A designated Information Officer has been appointed and registered with the Information Regulator in line with section 56 of POPIA. For privacy or data access concerns, please also contact: accounts@velocitymedia.co.za

5.1. Chief Information Officer

Name: Ryan Bradley Sessel
Tel: +27 73 392 7594
Email: ryan@velocitymedia.co.za

5.2. Deputy Information Officer

Name: Barbara Pallavicini Sessel
Tel: +351 910 472 846
Email: barbara@velocitymedia.co.za

5.3. Access to information general contacts

Email: accounts@velocitymedia.co.za

5.4. National or Head Office

Postal & Physical Address: 25 Club Street
Johannesburg
Gauteng
2192
Mobile: +27 73 343 5692
Email: saccounts@velocitymedia.co.za
Website: <https://www.velocitymedia.agency/>

6. Guide on How to Use Paia and How to Obtain Access to the Guide

- 6.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 6.2. The Guide is available in each of the official languages and in braille from the Information Regulator's website at: <https://inforegulator.org.za>, or can be requested directly from their offices:

Address: JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Tel: 010 023 5200

Email: inforeg@justice.gov.za

- 6.3. The aforesaid Guide contains the description of -
- (a) The objects of PAIA and POPIA
 - (b) The postal and street address, phone and fax number and, if available, electronic mail address of -
 - (i) The Information Officer of every public body, and

- (ii) Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- (c) The manner and form of a request for -
 - (i) Access to a record of a public body contemplated in section 11³; and
 - (ii) Access to a record of a private body contemplated in section 50⁴;
- (d) The assistance available from the IO of a public body in terms of PAIA and POPIA;
- (e) The assistance available from the Regulator in terms of PAIA and POPIA;
- (f) All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging -
 - (i) An internal appeal;
 - (ii) A complaint to the Regulator; and
 - (iii) An application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

¹ Section 17(1) of PAIA - *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA - *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA - *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA - *A requester must be given access to any record of a private body if -*

- a) that record is required for the exercise or protection of any rights;*
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- (g) The provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- (h) The provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- (i) The notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- (j) The regulations made in terms of section 92¹¹.

6.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

6.5. The Guide can also be obtained -

- (a) Upon request to the Information Officer;
- (b) From the website of the Regulator

(<https://www.justice.gov.za/infoereg/>).

6.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours -

⁵ Section 14(1) of PAIA - The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA - The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA - The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

⁸ Section 52(1) of PAIA - The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

⁹ Section 22(1) of PAIA - The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA - The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

(a) English [PAIA GUIDE - English](#)

(b) Afrikaans [PAIA GUIDE - Afrikaans](#).

- 6.7. For details on how to request access to information held by Velocity, the right of refusal of access to records, remedies available when Velocity refuses a request for access, and fees payable in terms of requests for access, please refer to the Guides listed in **Section 6.6** above.

7. Categories of Records of Global Trolley (Pty) Ltd T/A Velocity Media which are Available without a Person having to Request Access (Records which are Automatically Available)

- 7.1. No notice has been submitted by the company to the Minister of Justice and Constitutional Development regarding the categories of records, which are available without a person having to request access in terms of Section 52(2) of PAIA.
- 7.2. However, the information on the website of the business is automatically available without having to request access in terms of PAIA (refer to Section 8 for further details). This includes:
 - (a) Terms of Use
 - (b) Privacy Policy
 - (c) PAIA Manual
 - (d) Blog and Thought Leadership Articles
 - (e) Online Service Descriptions
- 7.3 For a full breakdown of our lawful processing practices, see our [Privacy Policy](#) and [Terms of Use](#) which form an extension of this PAIA Manual.

8. Description of the Records of Global Trolley (Pty) Ltd T/A Velocity Media which are Available in Accordance with any Other Legislation

- 8.1. Where applicable, Velocity also retains records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement, or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of PAIA.
- 8.2. A request to access must be done in accordance with the prescriptions of PAIA.
- 8.3. Legislation applicable:
- (a) Auditing Professions Act, No. 26 of 2005
 - (b) Basic Conditions of Employment Act, No. 75 of 1997
 - (c) Broad-Based Black Economic Empowerment Act, No. 75 of 1997
 - (d) Business Act, No. 71 of 1991
 - (e) Companies Act, No. 71 of 2008
 - (f) Compensation for Occupational Injuries & Diseases Act, No. 130 of 1993
 - (g) Competition Act, No.89 of 1998
 - (h) Constitution of the Republic of South Africa 2008
 - (i) Consumer Protection Act, No. 68 of 2008
 - (j) Copyright Act, No. 98 of 1978
 - (k) Cybercrimes Act, No. 19 of 2020
 - (l) Electronic Communications Act, No. 36 of 2005
 - (m) Electronic Communications and Transactions Act, No. 25 of 2002
 - (n) Employment Equity Act, No. 55 of 1998
 - (o) Financial Intelligence Centre Act (FICA), No. 38 of 2001

- (p) Identification Act, No. 68 of 1997
- (q) Income Tax Act, No. 58 of 1962
- (r) Intellectual Property Laws Amendment Act, No. 38 of 1997
- (s) Labour Relations Act, No. 66 of 1995
- (t) Long Term Insurance Act, No. 52 of 1998
- (u) Occupational Health & Safety Act, No. 85 of 1993
- (v) Prescription Act, No. 68 of 1969
- (w) Prevention of Organised Crime Act, No. 121 of 1998
- (x) Promotion of Access to Information Act, No. 2 of 2000
- (y) Protection of Personal Information Act, No. 4 of 2013
- (z) Protection of Personal Information Amendment Bill (if passed by date of update)
- (aa) Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- (bb) Revenue Laws Second Amendment Act, No. 61 of 2008
- (cc) Skills Development Levies Act, No. 9 of 1999
- (dd) Short-term Insurance Act, No. 53 of 1998
- (ee) Unemployment Insurance Contributions, No. Act 4 of 2002
- (ff) Unemployment Insurance Act, No. 30 of 1966
- (gg) Value Added Tax Act 89 of 1991.

8.4. Although we have used Velocity's best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete.

- (a) Whenever it comes to Velocity's attention that existing or new legislation allows a Requester access on a basis other than set out in PAIA, Velocity shall update the list accordingly.
- (b) If a Requester believes that a right of access to a record exists in terms of other legislation than listed above, the Requester is required to indicate what legislative right the request is based on, to allow the Velocity Information Officer the opportunity to consider the request.

- 8.5. It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal as set out in the Act.

9. Description Of The Subjects On Which The Body Holds Records And Categories Of Records Held On Each Subject By Global Trolley (Pty) Ltd T/A Velocity Media

Subjects on which the body holds records	Categories of Records	Available on Website	Available upon Request to the relevant data subject, contingent on compliance with Sections 50, and 62 to 70 of PAIA
Strategic Documents, Plans, Proposals	• Annual Reports • Strategic Plan • Annual Performance Plan • Organisational Profile		X
Human Resources	• HR policies and procedures • Advertised posts • Employees records • Learning and Development - Skills Development and Training Plans • Employment Equity Plan and Statistics		X
Policies, Guidelines, Codes of Conduct, and Guidance Notes	• PAIA Guide • PAIA Manual • Policy on Website Privacy	X	X
Operational Policies and Procedures or Frameworks	• Supply Chain Management • Suppliers • Risk Management • Audit		X

Subjects on which the body holds records	Categories of Records	Available on Website	Available upon Request to the relevant data subject, contingent on compliance with Sections 50, and 62 to 70 of PAIA
	● IT Related including: ○ Computer / mobile device usage policy documentation ○ Disaster Recovery Plans ○ Hardware Asset Registers ○ Information Security Policies / Standards / Procedures ○ Information Technology Systems and User Manuals and Usage Policy Documentation ○ Project Implementation Plans ○ Software Licensing ● Financial Management ● Human Resources ● Marketing and Branding Records Management		
Legal, Policy & Research	● Statutory Records including: ○ Memorandum of Incorporation ○ Minutes of Meetings of Directors / Shareholders ○ Register of Directors / Shareholders ○ Resolutions / Special Resolutions passed ○ Appointment of Auditors, Company Secretary, Directors, Prescribed Officers, Public Officers ● Research Papers		X
Corporate Governance	● Organisational and Business Plans ● Memorandum of Understanding		X

Subjects on which the body holds records	Categories of Records	Available on Website	Available upon Request to the relevant data subject, contingent on compliance with Sections 50, and 62 to 70 of PAIA
	• Occupational Health and Safety Plan • Environmental Management Plan • Loss Control Register		
Publicity, Marketing Material and Publications	• Publications • Blog posts • E-Books • Guides • Reports • Frequently Asked Questions	X	X
Media	• Press releases • Radio and TV interviews • Statements • Participation details • Gifts and awards • Website content • Corporate Identity • Infographics	X	X
Events, Functions, Seminars, Conferences and Webinars	• Presentations • Discussions • Documents • Recordings - slides, photographs, films and videos	X	X
Registers	• Information Officers • Codes of Conduct • Internal Directories • File Plan		X

Subjects on which the body holds records	Categories of Records	Available on Website	Available upon Request to the relevant data subject, contingent on compliance with Sections 50, and 62 to 70 of PAIA
	• Records Control Schedule		
Reports / Minutes / Decisions	• Survey findings and feedback • Monitoring and Evaluation • Statistics • Submissions on Legislation		X
Supply Chain Matters	• Bid Documents • Contracts • Purchase Orders • Quotations • Tenders • Terms of References and Leases		X
Investigation and Compliance	• Subpoena based hearings • Summons • Warrants to search and seize item • Enforcement notices • Information notices • HR Interventions • Public Hearings • Plenary Reports • Investigation Reports		X
Financial Matters	• Financial Accounting Records • Financial Reports • Annual Financial Statements • Contract Management and Administration • Asset Management & Register • Management Accounts		

Subjects on which the body holds records	Categories of Records	Available on Website	Available upon Request to the relevant data subject, contingent on compliance with Sections 50, and 62 to 70 of PAIA
	• Estimates • Statements • Budgets • Reports • Audit Records • Revenue Statements • Reports and Returns • Bank Statements • Banking Details and Bank Accounts • Debtors / Creditors Statements and Invoices • Rental Agreements • Tax Returns • Income Tax Records including: ○ PAYE Records ○ Documents issued to employees for income tax purposes ○ Records of payments made to SARS on behalf of employees ○ All other statutory compliances: VAT, Skills Development Levies, UIF, Workmens' Compensation		
CRM and Engagement Data	• Customer journey logs • Interaction and automation triggers • Lead and conversion analytics • Chatbot interaction records		
Learning Management and Data	• Course participation logs • Assessment records • Attendance and feedback		

10. Processing Of Personal Information

10.1. Purpose of Processing Personal Information

- (a) Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party.
- (b) Velocity needs Personal Information relating to both individual and juristic persons to carry out its business and organisational activities and functions.
- (c) The way the information is processed and the purpose for which it is processed is determined by Velocity and Velocity is therefore a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of the Data Subject:
 - (i) Is processed lawfully, fairly and transparently and in terms of a justifiable legal basis (for example, consent) - this includes providing the appropriate information to Data Subjects when Velocity collects their data, in the form of privacy and data collection notes;
 - (ii) Is processed only for the purposes for which it was collected;
 - (iii) Will not be processed for a secondary purpose unless that processing is compatible with the original purpose;
 - (iv) Is adequate, relevant and not excessive for the purposes for which it is collected;
 - (v) Is accurate and kept up to date;
 - (vi) Will not be kept for longer than necessary;

- (vii) Is processed in accordance with integrity and confidentiality principles - including physical and organisational measures to ensure that Personal Information (both in physical and electronic form) are subject to an appropriate level of security when stored, used and communicated by Velocity, in order to protect against access and acquisition by unauthorised persons and accidental loss, damage or destruction;
- (viii) Is processed in accordance with the rights of Data Subjects, where applicable.

10.2. Data Subjects have the right to:

- (a) Be notified that their Personal Information is being collected by Velocity;
- (b) Be notified in the event of a data breach;
- (c) Know whether Velocity holds Personal Information about them, and to have access to that information. Any request for information must be handled in accordance with the provisions of PAIA;
- (d) Request the correction or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading, or unlawfully obtained personal information;
- (e) Object to Velocity's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to Velocity's record-keeping requirements);
- (f) Object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
- (g) Complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged

noncompliance with the protection of his, her or its personal information.

10.3. Description of the categories of Data Subjects and of the information or categories of information relating thereto:

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients / Prospects and Subscribers (local and foreign) / Marketing Databases	• Names and surnames • Names of legal entities • Contact details (contact numbers, fax number, email address) • Residential, postal or business address • Registration numbers or Identity numbers • Employment status and bank details • Confidential correspondence • VAT numbers • Trade secrets / confidential client information • Broad-based Black Economic Empowerment Status • Business Strategies
Service Providers	• Names and surnames • Contact details (contact numbers, fax number, email address) • Residential, postal or business address • Registration numbers or Identity numbers • Names of directors and shareholders / members • Bank details • Confidential correspondence • VAT numbers • Trade secrets • Broad-based Black Economic Empowerment Status • Business Strategies
Employees, Contractors and Consultants	• Names and surnames • Contact details (contact numbers, fax number, email address) • Residential, postal or business address • Registration numbers or Identity numbers

Categories of Data Subjects	Personal Information that may be processed
	• Bank details • Employee / contractor / consultant contracts • Forms and Applications • Leave Records • Payroll Reports • Confidential correspondence • Tax related information • Qualifications • Gender • Race • Pregnancy • Marital Status • Age • Language • Financial information • Employment history • Criminal record • Well-being and family members • Medical, physical and mental health, disability • Nationality, ethnic or social origin • Biometric information • Professional affiliation and references • Training records • Performance appraisals • Disciplinary records

10.4. The recipients or categories of recipients to whom the personal information may be supplied:

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be Supplied
Identity number and names and other personal details	• For criminal checks - South African Police Services • Any firm / organisation / person that Velocity uses to collect payments and recover debts or to provide a service on its behalf • Any firm / organisation / person who provides Velocity with products or services • Any payment system that Velocity uses • Regulatory and governmental authorities or ombudsmen, or other authorities including tax authorities where Velocity has a duty to share information • Third parties to whom payments are made on behalf of employees • Financial institutions from whom payments are received on behalf of data subjects • Any other operator not specified • Employees, contractors and temporary staff • Agents.
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

10.5. Planned transborder flows of personal information

(a) Personal Information may be transmitted transborder to Velocity's stakeholders and suppliers in other countries, and Personal

Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws.

- (b) Velocity will endeavour to ensure that its dealers and suppliers will make all reasonable efforts to secure said data and Personal Information.
- (c) All cross-border data transfers are governed by section 72 of POPIA. Transfers are made only where:
 - (i) The receiving country has adequate protection legislation; or
 - (ii) Binding agreements with data processors exist ensuring equivalent data protection; or
 - (iii) The Data Subject has provided express, written consent.
- (d) Any transfer of personal information cross-border shall be with the data subject's consent, however, should it not be reasonably practicable to obtain the data subject's consent, Velocity shall transfer the personal information if -
 - (i) It will be for the data subject's benefit, and
 - (ii) The data subject would have given consent should it have been reasonably practicable to obtain such consent.

10.6. Information Security Measures are implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information.

- (a) Velocity continuously establishes and maintains appropriate, reasonable technical and organisational measures by taking appropriate, reasonable technical and organisational measures to prevent -
 - (i) Loss of, damage to or unauthorised destruction of personal information; and
 - (ii) Unlawful access to or processing of personal information.
- (b) Velocity has taken reasonable measures, as contained in paragraph (c) below, to -
 - (i) Identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control;

- (ii) Establish and maintain appropriate safeguards against the risks identified;
 - (iii) Regularly verify that the safeguards are effectively implemented; and
 - (iv) Ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.
- (c) Measures taken by Velocity include, amongst others:
- (i) Access control
 - (ii) User control
 - (iii) Data encryption
 - (iv) Defensive measures
 - (v) Robust monitoring, auditing, and reporting capabilities
 - (vi) Data backups
 - (vii) Anti-virus and anti-malware solutions
 - (viii) Awareness and vigilance
 - (ix) Agreements are concluded with operators and third-party service providers processing personal information on our behalf to implement security controls, which include confidentiality clauses, breach notification obligations, and minimum-security standards.

11. Records That Cannot Be Found Or Do Not Exist

- 11.1. Requesters have the right to receive a response in the form of an affidavit or affirmation where records cannot reasonably be located, but to which a requester would have had access had the record been available¹².
- 11.2. Requesters also have the right to receive a response in the form of an affidavit or affirmation where requested records do not exist.

12. Complaints to the Information Regulator

- 12.1. Data Subjects may lodge complaints directly with the Information Regulator if they believe their rights under POPIA or PAIA have been infringed.
- 12.2. Information Regulator Contact Details:
 - Address: JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001
 - Tel: 010 023 5207
 - Email: complaints.IR@justice.gov.za
infoereg@justice.gov.za

¹² Section 23(1) of PAIA

13. Availability Of The Manual

13.1. A copy of the Manual is available -

- (a) On our website at <https://velocitymedia.agency/>, on <https://pretoria.co.za/>, and on <https://joburg.co.za/>
- (b) At the head office of Velocity for public inspection during normal business hours
- (c) To any person upon request and upon the payment of a reasonable prescribed fee; and
- (d) To the Information Regulator upon request.

13.2. A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

14. Updating Of The Manual

The head of Velocity will on a regular basis update this manual.

Issued by

Ryan Sessel

Chief Executive Officer

