

PAIA MANUAL
Naspers Limited
(Registration number: 1925/001431/06)
and various of its subsidiaries
(NASPERS)

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF
ACCESS TO INFORMATION ACT 2 OF 2000 (THE ACT) (PAIA)



Contents

1. PURPOSE OF PAIA MANUAL	3
2. DEFINITIONS AND INTERPRETATIONS	3
3. CONTACT DETAILS	4
4. INFORMATION REGULATOR'S GUIDE	4
5. CATEGORIES OF RECORDS OF NASPERS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS	6
6. DESCRIPTION OF THE RECORDS OF NASPERS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	6
7. DESCRIPTION OF THE DOMAINS ON WHICH NASPERS HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY NASPERS	7
8. PROCESSING OF PERSONAL INFORMATION	8
9. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION	9
10. AVAILABILITY OF THE MANUAL	11
11. UPDATING OF THE MANUAL	11
12. VARIOUS SUBSIDIARIES OF NASPERS	11
13. FORMS OF REQUEST	12

1. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 1.3 know the description of the records of the body which are available in accordance with any other legislation;
- 1.4 access all the relevant contact details of the Information Officer and Deputy Information Officer(s) who will assist the public with the records they intend to access;
- 1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9 know if the body 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
- 1.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

The manual may be amended from time to time and as soon as any amendments have been finalised, the latest version of the manual will be made public.

Any requester is advised to contact the Information Officer should he/she require any assistance in respect of the utilisation of this manual.

2. DEFINITIONS AND INTERPRETATIONS

The following words will bear the following meaning in this Manual –

- 2.1 "**Act**" – the Promotion of Access to Information Act 2 of 2000, together with all relevant regulations published;
- 2.2 "**Data Subject**" – means the person to whom the personal information relates;
- 2.3 "**Guide**" – means the **Guide** on how to use PAIA by any person who wishes to exercise any right contemplated in PAIA and POPIA;
- 2.4 "**Information Regulator**" – the Information Regulator established in terms of Section 39 of POPIA;
- 2.5 "**manual**" – this manual together with all annexures thereto as available at the offices of Naspers and on the **Naspers** website, from time to time;
- 2.6 "**Naspers**" – Naspers Limited, and various of its subsidiaries as set out in part 9, page 11 and further of this manual;
- 2.7 "**Republic**" – the Republic of South Africa;
- 2.8 "**SAHRC**" – shall mean the South African Human Rights Commission;
- 2.9 "**PAIA**" – Promotion of Access to Information Act 2 of 2000 (as amended); and
- 2.10 "**POPIA**" – Protection of Personal Information Act 4 of 2013.

3. CONTACT DETAILS

Section 51(1)(a) of the Act

3.1	Name of body:	Naspers Limited
3.2	Chief executive:	Fabricio Bloisi
3.3	Appointed Information Officer:	Lynelle Bagwandeem
3.4	Appointed Deputy Information Officer:	Lynne Simons
3.5	Registered address:	Media24 Centre 40 Heerengracht Cape Town 8001
3.6	Postal address:	PO Box 2271 Cape Town 8000
3.7	Address where records are kept:	Suite 15, 3rd floor, Oxford & Glenhove 116 Oxford Road, Houghton Estate Johannesburg
3.8	Telephone:	+27 11 575 2804
3.9	Email:	cosec@naspers.com
3.10	Website:	www.naspers.com

4. INFORMATION REGULATOR'S GUIDE

- 4.1 The Information Regulator has, in terms of Section 10(1) of PAIA, as amended, updated and made available the revised Guide (<https://infoeregulator.org.za/paia-guidelines/>) on how to use PAIA, 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.
- 4.2 The Guide is available in each of the official languages and braille.
- 4.3 The aforesaid Guide contains the description of:
 - 4.3.1 the objects of PAIA and POPIA;
 - 4.3.2 the postal and street address, phone and fax numbers and, if available, electronic mail address of –
 - 4.3.2.1 the Information Officer of every public body and private body, and
 - 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of Section 17(1) of PAIA¹ and Section 56 of POPIA²;
 - 4.3.3 the manner and form of a request for –
 - 4.3.3.1 access to a record of a private body contemplated in Section 50³; and
 - 4.3.3.2 access to a record of a public body contemplated in Section 11⁴;

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 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.

⁴ 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.

- 4.3.4 assistance available from the Information Regulator in terms of PAIA and POPIA;
- 4.3.5 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 –
 - 4.3.5.1 an internal appeal;
 - 4.3.5.2 a complaint to the Information Regulator; and
 - 4.3.5.3 an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal, a decision by the Information Regulator or a decision of the head of a private body;
- 4.3.6 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;
- 4.3.7 the provisions of Sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.8 the notices issued in terms of Sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.9 the regulations made in terms of Section 92¹¹ of PAIA.
- 4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies during normal working hours (in at least two of the official languages), including the office of the Information Regulator (in each of the official languages). The Guide in each of the official languages can also be obtained:
 - 4.4.1 from the Government Gazette;
 - 4.4.2 upon request from the Information Regulator, by the Information Officer on a form which corresponds substantially with Form 1 of Annexure A to the Regulations;
 - 4.4.3 upon request from the Information Regulator, by any person, other than an Information Officer, on a form that corresponds substantially with Form 2 of Annexure A to the Regulations. The fees in relation to a copy of the Guide are provided for in Item 1 of Annexure B may apply to the aforesaid person;
 - 4.4.4 from the website of the Information Regulator (<https://info regulator.org.za/paia-guidelines/>) and that of any public and private bodies.
- 4.5 A copy of the Guide is also available at the Naspers offices in the following two official languages, for public inspection during normal office hours:
 - 4.5.1 English and Afrikaans

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.”

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

Naspers does not have a separate notice of records automatically available to requesters. The provisions of this paragraph 5 constitute the entire list of records automatically available for purposes of Section 51(1)(b)(ii) of the Act; these records being:

Category of records	Types of the record	Available on website
Group profile	• Purpose • Strategy and business model • Leadership (management and board)	x
Operational structures	• Group structure • List of businesses and links to websites	x
Investor information	• Financial results • Annual reports • investor information • Shareholder notices	x
Governance and sustainability	• Governance structure • Sustainability focus • Policies • Tax	x
Media releases	• Press releases • News and insights • SENS announcements	x
Public corporate records	• Memorandum of incorporation • BEE certificates	x
Published financial records	• Annual reports • Annual financial statements • Half-year results	x
Privacy	• Naspers Privacy Statement • Talent Acquisition Privacy Statement • Cookie Notice • Group policy on data-privacy governance • Approach to AI ethics • Naspers PAIA Manual • Naspers PAIA Manual (Afrikaans) • PAIA Guidelines	x

6. DESCRIPTION OF THE RECORDS OF NASPERS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Naspers keeps information/documents in accordance with the following legislation (please note that this is not an exhaustive list):

Applicable legislation	Category of records
Companies Act 71 of 2008, as amended	Memorandum of incorporation and other statutory records related to the Company and its subsidiaries.
Income Tax Act 58 of 1962 (Section 75), as amended	SARS Monthly EMP201, Biannual and Annual EMP501 Reconciliation
Taxation Administration Act 28 of 2011 (Section 29)	Tax records and filings
Value-Added Tax Act 89 of 1991 (Section 55), as amended	Tax records and filings
South African Reserve Bank Act 90 of 1989, as amended	SARB filings, approvals and annual updates

Applicable legislation	Category of records
Basic Conditions of Employment Act 75 of 1997 (Section 31), as amended	Employee records/files (employment contracts; addendums; forms and applications; medial aid; pension fund applications; etc) Digital HR Information System (employee leave records; salary records; job records; etc) Local HR Intranet (Policies; Employee Benefits information)
Broad-Based Black Economic Empowerment Act 53 of 2003, as amended	BBBEE audit files BBBEE certificates issued
Employment Equity Act 55 of 1998 (Section 26), as amended	Employment Equity Plan Annual EE Report
Occupational Health and Safety Act 85 of 1993, as amended	Health and Safety files (accident records; safety, health and environmental records, etc)
Labour Relations Act 66 of 1995, as amended	Employee records/files (disciplinary records)
Skills Development Act 97 of 1998, as amended	Work-Skills Plan Annual Training Report
Skills Development Levies Act 9 of 1999, as amended	SARS Monthly EMP201, Biannual and Annual EMP501 Reconciliation
Unemployment Insurance Act 63 of 2001, as amended	SARS Monthly EMP201, Biannual and Annual EMP501 Reconciliation
Unemployment Insurance Contributions Act 4 of 2002, as amended	UIF Monthly U-Filing
Compensation for Occupational Injuries and Diseases Act 130 of 1993, as amended	Return of Earnings and Letter of Good Standing
Trade Marks Act 194 of 1993, as amended	All registered trademarks and applications.

7. DESCRIPTION OF THE DOMAINS ON WHICH NASPERS HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY NASPERS

- 7.1. The documents/information listed herein below pertain to the day-to-day management of the business of Naspers and in accordance with other legislation.
- 7.2. It is recorded that any and all documents/information requested pertaining to the aforesaid shall always only be made available to a requestor subject to the provisions of the Act.

Subjects on which Naspers holds records	Categories of records
Strategic documents	- Annual reports - Business plans and budgets - Management reports
Human resources	- Standard employment contracts - Employment equity plan and report - Naspers personnel report - Human resources policies and procedures - Rules and regulations relating to pension and provident funds - Documentation regarding share option schemes
Commercial documents	- Insurance policies - List of trademarks and pending applications - Commercial contracts - Company policies
Company records	- Constitutive documentation - Statutory records.

8. PROCESSING OF PERSONAL INFORMATION

- 8.1. Naspers processes personal information lawfully and in a manner that does not infringe on your privacy. More specifically, Naspers processes personal information in accordance with POPIA and for reasons set out in our privacy policy, which is available on our website [here](#).
- 8.2. Naspers processes personal information for the following purposes:
- 8.2.1. authenticate your identity in order to provide you with access to certain files;
 - 8.2.2. manage corporate responsibilities related to shareholder structure and shareholder engagement;
 - 8.2.3. and other forms of intellectual property belonging to us or third parties;
 - 8.2.4. gain insight into how our visitors use the website and to improve our website service;
 - 8.2.5. contribute to research and analytics studies, including use of artificial intelligence and machine learning;
 - 8.2.6. recognise, prevent and investigate attacks of our website;
 - 8.2.7. comply with applicable laws;
 - 8.2.8. enforce our terms of use;
 - 8.2.9. any other purposes that you indicate when you agree to provide it to us; and
 - 8.2.10. by email, or for subscriptions in our Newsroom.

- 8.3. Description of categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal information that may be processed
Investors and Shareholders	Names, registration numbers (or identity numbers as applicable), address, contact numbers and bank details.
Consumers (only insofar they reach out to Naspers directly)	Although Naspers does not itself process significant volumes of consumer personal information, most of our investee companies do. To learn more about how any of our investees manage your personal data when you use their services please refer to the list of our investees at https://www.naspers.com/companies and access their Privacy Policies and/or Privacy Portals through the links embedded on this page.
Service Providers	Names, registration numbers (or identity numbers as applicable), vat numbers, address, commercial contracts and bank details.
Employees (including internship and learnership recipients)	Full name, identity numbers, address, contact numbers, qualifications, gender and race.
Prospective employees	Naspers has a Talent Acquisition Privacy Statement (and is available on the the Naspers website here) that deals with the processing of personal information of prospective employees.

- 8.4. The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or categories to whom the personal information may be supplied
Investors/Shareholders names, registration numbers (or identity numbers as applicable), address, contact numbers and bank details	With the relevant transfer secretaries duly appointed by Naspers.
Employees' (including internship and learnership recipients) full name, identity numbers, address, contact numbers, qualifications, gender and race	With duly appointed auditors for verification.

- 8.5. Planned transborder flows of personal information

Naspers is global company and may transfer personal information outside of the country in which it was collected, including outside the Republic of South Africa.

Type of information	Country in which information is stored
Information collected from website	Netherlands/European Union
Employee information	Netherlands/European Union
Investor information	Netherlands/European Union
Service provider information	Netherlands/European Union

- 8.6. General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.
 - 8.6.1. Physical security measures, including access control measures and internal security protocols, are implemented to protect personal information from unauthorised physical access.
 - 8.6.2. Naspers is also committed to identifying and managing cyber-risks as part of its risk management framework. Our Group cybersecurity policy sets the expectations from our businesses to focus on implementing governance, striving to become cybersecure, cyber vigilant and cyber-resilient. For more information on our security approach, please see [here](#).
 - 8.6.3. Password control policies are enforced to ensure that only authorised personnel can access sensitive information.

9. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

9.1. Completion of prescribed form:

- 9.1.1. A request for access to information must be made in the prescribed form (Form 2) to the appointed Information Officer indicated above.
- 9.1.2. All required text fields in Form 2 must be completed in full and in a legible form. The form (as well as any additional pages attached thereto) must be signed by the person submitting the form.
- 9.1.3. Requesters must provide sufficient details to enable Naspers to identify:
 - 9.1.3.1. the record(s) requested;
 - 9.1.3.2. the requester (and if an agent is lodging the request, proof of capacity);
 - 9.1.3.3. the form of access required;
 - 9.1.3.4. the postal address or fax number of the requester in the Republic;
 - 9.1.3.5. if the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof; and
 - 9.1.3.6. the right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

9.2. Request in terms of POPIA

- 9.2.1. POPIA provides that a data subject may, upon proof of identity, request Naspers 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 or categories of third parties who have or have had access to such information.
- 9.2.2. POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, Naspers must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
- 9.2.3. POPIA provides that a data subject may object, at any time, to the processing of personal information by Naspers, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as Annexure E and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.
- 9.2.4. A data subject may also request Naspers to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that Naspers is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- 9.2.5. A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above on the form attached hereto as Annexure F.

- 9.2.6. Proof of identity is required to authenticate your identity and the request. You may, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

9.3. Prescribed fees

There are two categories of fees which are payable:

- 9.3.1. The request fee: R140.
- 9.3.2. The access fee: This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. Please refer to Annexure D.
- 9.3.3. Section 54 of PAIA entitles Naspers to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Annexure B of Government Notice No R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Annexure D.
- 9.3.4. Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.
- 9.3.5. Please see Annexure D for a breakdown of prescribed fees.

9.4. Timelines for consideration of a request for access:

- 9.4.1. Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.
- 9.4.2. The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No R.757 dated 27 August 2021 promulgated under the PAIA Regulations.
- 9.4.3. Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

9.5. Grounds for refusal of access and protection of information:

- 9.5.1. There are various grounds upon which a request for access to a record may be refused. These grounds include:
- 9.5.1.1. the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
 - 9.5.1.2. the protection of commercial information of a third party (for example: trade secrets, financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
 - 9.5.1.3. if disclosure would result in the breach of a duty of confidence owed to a third party;
 - 9.5.1.4. if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
 - 9.5.1.5. if the record was produced during legal proceedings, unless that legal privilege has been waived;
 - 9.5.1.6. if the record contains trade secrets, financial or sensitive information or any information that would put Naspers at a disadvantage in negotiations or prejudice it in commercial competition; and/or
 - 9.5.1.7. if the record contains information about research being carried out or about to be carried out on behalf of a third party or by Naspers.
- 9.5.2. Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal: (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.
- 9.5.3. If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the record.

10. AVAILABILITY OF THE MANUAL

- 10.1. A copy of the manual is available:
- 10.2. on the Naspers website (www.naspers.com);
- 10.3. at the offices of Naspers, for public inspection;
- 10.4. to any person upon request and upon the payment of a reasonable prescribed fee; and
- 10.5. to the Information Regulator upon request.
- 10.6. The request forms and fee structure are available on the Information Regulator's website at <https://info regulator.org.za/>.

11. UPDATING OF THE MANUAL

The chief executive of Naspers will on a regular basis update this manual.

12. VARIOUS SUBSIDIARIES OF NASPERS

12.1. Naspers Corporate

Company	Registration number
Heemstede Beleggings Proprietary Limited	1994/005106/07
MIH Ecommerce Proprietary Limited	1998/005309/07
MIH Holdings Proprietary Limited	1993/005613/07
MIH Treasury Services Proprietary Limited	2007/014128/07
Naspers Limited	1925/001431/06

12.2. Media24 group (this group has its own PAIA manual on its website at www.media24.com)

Company	Registration number
Media24 Holdings Proprietary Limited	2006/021408/07

12.3. Takealot group (this group has its own PAIA manual on its website at www.takealot.com)

Company	Registration number
Takealot Online (RF) Proprietary Limited	2006/021408/07

12.4. Property24 (this company has its own PAIA manual on its website at www.property24.com) and AutoTrader group (this group has its own PAIA manual on its website www.autotrader.co.za)

Company	Registration number
Homefind24 Proprietary Limited	2008/019235/07

12.5. PayU South Africa (this company has its own PAIA manual on its website at www.southafrica.payu.com)

Company	Registration number
PayU Payments Solutions Proprietary Limited	2009/017393/07

13. FORMS OF REQUEST

Annexure A:	Form 2: Request for access to record
Annexure B:	Form 1: Request for a copy of the guide from the Information Regulator
Annexure C:	Form 1: Request for a copy of the guide from the Information Officer
Annexure D:	Form 3: Outcome of request and fees
Annexure E:	Form 4: Internal appeal
Annexure F:	Form 5: Complaint form
Annexure G:	Form 13: Request for assessment
Annexure H:	Form 4: Objection to the processing of personal information
Annexure I:	Form 5: Request for correction or deletion of personal information or destroying or deletion of record of personal information

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

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

TO: The Information Officer

(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 <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

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

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

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

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

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

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



**INFORMATION
REGULATOR
(SOUTH AFRICA)**

*Ensuring protection of your personal information
and effective access to information*

Address: JD House, 27 Stiemens Street
Braamfontein, Johannesburg, 2001
P.O. Box 31533
Braamfontein, Johannesburg, 2017
Tel: 010 023 5200

Email: PAIACompliance@infoRegulator.org.za

REQUEST FOR A COPY OF THE GUIDE

FORM 1

[Regulation 2]

I,

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

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

Language (mark with "X")		No of copies	Language(mark with "X")		No of copies
☐	Sepedi		☐	Sesotho	
☐	Setswana		☐	siSwati	
☐	Tshivenda		☐	Xitsonga	
☐	Afrikaans		☐	English	
☐	isiNdebele		☐	isiXhosa	
☐	isiZulu				

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)
☐	☐	☐	☐

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

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

[Regulations 3]

TO: 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
☐	Sepedi		☐	Sesotho	
☐	Setswana		☐	siSwati	
☐	Tshivenda		☐	Xitsonga	
☐	Afrikaans		☐	English	
☐	isiNdebele		☐	isiXhosa	
☐	isiZulu				

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)
☐	☐	☐	☐

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
 [Regulation 8]

Note:

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

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

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

OR

2. You requested:

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

3. To be submitted:

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

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

--

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor	R60.00		
• If provided to the requestor			
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

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

☐

Yes

☐

No

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

The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer

INTERNAL APPEAL FORM

FORM 4

[Regulation 9]

Reference Number:

PARTICULARS OF PUBLIC BODY				
Name of Public Body				
Name and Surname of Information Officer:				
PARTICULARS OF COMPLAINANT WHO LODGES THE INTERNAL APPEAL				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				
Is the internal appeal lodged on behalf of another person?		Yes		No
If answer is "yes", capacity in which an internal appeal on behalf of another person is lodged: <i>(Proof of the capacity in which appeal is lodged, if applicable, must be attached.)</i>				
PARTICULARS OF PERSON ON WHOSE BEHALF THE INTERNAL APPEAL IS LODGED (If lodged by a third party)				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				

DECISION AGAINST WHICH THE INTERNAL APPEAL IS LODGED <i>(mark the appropriate box with an "X")</i>	
Refusal of request for access	
Decision regarding fees prescribed in terms of section 22 of the Act	
Decision regarding the extension of the period within which the request must be dealt with in terms of section 26(1) of the Act	
Decision in terms of section 29(3) of the Act to refuse access in the form requested by the requester	
Decision to grant request for access	
GROUND FOR APPEAL <i>(If the provided space is inadequate, please continue on a separate page and attach it to this form. all the additional pages must be signed)</i>	
State the grounds on which the internal appeal is based:	
State any other information that may be relevant in considering the appeal:	

You will be notified in writing of the decision on your internal appeal. Please indicate your preferred manner of notification:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Appellant/Third party

FOR OFFICIAL USE

OFFICIAL RECORD OF INTERNAL APPEAL

Appeal received by: (state rank, name and surname of Information Officer)				
Date received:				
Appeal accompanied by the reasons for the information officer's decision and, where applicable, the particulars of any third party to whom or which the record relates, submitted by the information officer:				Yes
				No
OUTCOME OF APPEAL				
Refusal of request for access. Confirmed?	Yes		New decision (if not confirmed)	
	No			
Fees (Sec 22). Confirmed?	Yes		New decision (if not confirmed)	
	No			
Extension (Sec 26(1)). Confirmed?	Yes		New decision (if not confirmed)	
	No			
Access (Sec 29(3)). Confirmed?	Yes		New decision (if not confirmed)	
	No			
Request for access granted. Confirmed?	Yes		New decision (if not confirmed)	
	No			

Signed at _____ this _____ day of _____ 20 _____

Relevant Authority



**INFORMATION
REGULATOR
(SOUTH AFRICA)**

*Ensuring protection of your personal information
and effective access to information*

Address: JD House, 27 Stiemens Street
Braamfontein, Johannesburg, 2001
P.O. Box 31533
Braamfontein, Johannesburg, 2017
Tel: 010 023 5200

Email: PAIAComplaints@infoRegulator.org.za

COMPLAINT FORM

FORM 5

[Regulation 10]

NOTE:

- This form is designed to assist the Requester or Third Party (hereinafter referred to as "the Complainant") in requesting a review of a Public or Private Body's response or non-response to a request for access to records under the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA"). Please fill out this form and send it to the following email address: PAIAComplaints@infoRegulator.org.za or complete online complaint form available at <https://www.justice.gov.za/infoRegl>.
- PAIA gives a member of the public a right to file a complaint with the Information Regulator about any of the nature of complaints detailed in part F of this complaint form.
- It is the policy of the Information Regulator to defer investigating or to reject a complaint if the Complainant has not first given the public or private body (herein after referred to as "the Body") an opportunity to respond to and attempt to resolve the issue. To help the Body address your concerns prior to approaching the Information Regulator, you are required to complete the prescribed **PAIA Form 2** and submit it to the Body.
- A copy of this Form will be provided to the Body that is the subject of your complaint. The information you provide on this form, attached to this form or that you supply later, will only be used to attempt to resolve your dispute, unless otherwise stated herein.
- The Information Regulator will only accept your complaint once you confirm having complied with the prerequisites below.
- Please attach copies of the following documents, if you have them:**
 - Copy of the form to the Body requesting access to records;
 - The Body's response to your complaint or access request;
 - Any other correspondence between you and the Body regarding your request;
 - Copy of the appeal form, if your complaint relate to a public body;
 - The Body's response to your appeal;
 - Any other correspondence between you and the Body regarding your appeal;
 - Documentation authorizing you to act on behalf of another person (if applicable);
 - Court Order or Court documents relevant to your complaint, if any.
- If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

CAPACITY OF PERSON/PARTY LODGING A COMPLAINT

(Mark with an "X")

☐

Complainant Personally

☐

Representative of Complainant

☐

Third Party

PREREQUISITES

Did you submit request (PAIA form) for access to record of a public/private body?	Yes		No	
Has 30 days lapsed from the date on which you submitted your PAIA form?	Yes		No	
Did you exhaust all the internal appeal procedure against a decision of the Information officer of a public body?	Yes		No	
Have you applied to Court for appropriate relief regarding this matter?	Yes		No	

FOR INFORMATION REGULATOR'S USE ONLY			
Received by: (Full names)			
Position			
Signature			
Complaint accepted	Yes		No
Reference Number			
Date stamp			

Postal address	Facsimile	Other electronic communication (Please specify)

PART A PERSONAL INFORMATION OF COMPLAINANT			
Full Names			
Identity Number			
Postal Address			
Street Address			
E-Mail Address			
Contact numbers	Tel. (B)		Facsimile
	Cellular		

PART B REPRESENTATIVE INFORMATION (Complete only if you will be represented. A Power of Attorney must be attached if complainant is represented, failing which the complaint will be rejected)			
Full Names of Representative			
Nature of representation			
Identity Number / Registration Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PART C THIRD PARTY INFORMATION (Please attach letter of authorisation)			
Type of Body	Private		Public
Name of Public / Private Body			
Registration Number (if any)			
Name, Surname and Title of person authorised to lodge a complaint			
Postal Address			
Street Address			
E-mail Address			

Contact Numbers	Tel. (B):		Facsimile	
	Cellular			
PART D				
BODY AGAINST WHICH THE COMPLAINT IS LODGED				
Type of body	Private		Public	
Name of public / private body				
Registration number (if any)				
Name, surname and title of person you dealt with at the public or private body to try to resolve your complaint or request for access to information				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile	
	Cellular			
Reference Number given (if any)				
PART E				
COMPLAINT				
<i>Tell us about the steps you have taken to try to resolve your complaint (Complaints should first be submitted directly to the public or private body for response and possible resolution)</i>				
Date on which request for access to records submitted.				
Please specify the nature of the right(s) to be exercised or protected, if a complaint is against a private body.				
Have you attempted to resolve the matter with the organisation?	Yes		No	
If yes, when did you receive it? (Please attach the letter to this application.)				
Did you appeal against a decision of the information officer of the public body?	Yes		No	
If yes, when did you lodge an appeal?				
Have you applied to Court for appropriate relief regarding this matter?	Yes		No	
If yes, please indicate when was the matter adjudicated by the Court? Please attach Court Order, if there is any.				
PART F				
DETAILED TYPE OF ACCESS TO RECORDS				
<i>(Please select one or more of the following to describe your complaint to the Information Regulator)</i>				
Unsuccessful appeal (Section 77A(2)(a) or section 77A(3)(a) of PAIA)	I have appealed against the decision of the public body and the appeal is unsuccessful.			
Unsuccessful application for condonation (Sections 77A(2)(b) and 75(2) of PAIA)	I filed my appeal against the decision of the public body late and applied for condonation. The condonation application was dismissed.			

Refusal of a request for access (Section 77A(2)(c)(i) or 77A(2)(d)(i) or 77A(3)(b) of PAIA)	<i>I requested access to information held by a body and that request was refused or partially refused.</i>	
The body requires me to pay a fee and I feel it is excessive (Sections 22 or 54 of PAIA)	<i>Tender or payment of the prescribed fee.</i>	
	<i>The tender or payment of a deposit.</i>	
Repayment of the deposit (Section 22(4) of PAIA)	<i>The information officer refused to repay a deposit paid in respect of a request for access which is refused.</i>	
Disagree with time extension (Sections 26 or 57 of PAIA)	<i>The body decided to extend the time limit for responding to my request, and I disagree with the requested time limit extension or a time extension taken to respond to my access request.</i>	
Form of access denied (Section 29(3) or 60(a) of PAIA)	<i>I requested access in a particular and reasonable form and such form of access was refused.</i>	
Deemed refusal (Section 27 or 58 of PAIA)	<i>It is more than 30 days since I made my request and I have not received a decision.</i>	
	<i>Extension period has expired and no response was received.</i>	
Inappropriate disclosure of a record (Mandatory grounds for refusal of access to record)	<i>Records (that are subject to the grounds for refusal of access) have inappropriately/unreasonable been disclosed.</i>	
No adequate reasons for the refusal of access (Section 56(3)(a) of PAIA)	<i>My request for access is refused, and no valid or adequate reasons for the refusal, were given, including the provisions of this Act which were relied upon for the refusal.</i>	
Partial access to record (Section 28(2) or 59(2) of PAIA)	<i>Access to only a part of the requested records was granted and I believe that more of the records should have been disclosed.</i>	
Fee waiver (Section 22(8) or 54(8) of PAIA)	<i>I am exempt from paying any fee and my request to waive the fees was refused.</i>	
Records that cannot be found or do not exist (Section 23 or 55 of PAIA)	<i>The Body indicated that some or all of the requested records do not exist and I believe that more records do exist.</i>	
Failure to disclose records	<i>The Body decided to grant me access to the requested records, but I have not received them.</i>	
No jurisdiction (exercise or protection of any rights) (Section 50(1)(a) of PAIA)	<i>The Body indicated that the requested records are excluded from PAIA and I disagree.</i>	
Frivolous or vexatious request (Section 45 of PAIA)	<i>The Body indicated that my request is manifestly frivolous or vexatious and I disagree.</i>	
Other (Please explain)		
PART G EXPECTED OUTCOME How do you think the Information Regulator can assist you? Describe the result or outcome that you seek.		
PART H AGREEMENTS		

The legal basis for the following agreements is explained in the Privacy Notice on how to file your complaint document. In order for the Information Regulator to process your complaint, you need to check each one of the checkboxes below to show your agreement:

☐

I agree that the Information Regulator may use the information provided in my complaint to assist it in researching issues relating to the promotion of the right of access to information as well as the protection of the right to privacy in South Africa. I understand that the Information Regulator will never include my personal or other identifying information in any public report, and that my personal information is still protected by the Protection of Personal Information Act, 2013 (Act No. 4 of 2013). I understand that if I do not agree, the Information Regulator will still process my complaint.

☐

The information in this Complaint Form is true to the best of my knowledge and belief.

☐

I authorize the Information Regulator to collect my personal complaint information (such as the information about me in this complaint form) and use it to process my human rights complaint relating to the right of access to information and / or the protection of the right to privacy.

☐

I authorise anyone (such as an employer, service provider, witness) who has information needed to process my complaint to share it with the Information Regulator. The Information Regulator can obtain this information by talking to witnesses or asking for written records. Depending on the nature of the complaint, these records could include personnel files or employer data, medical or hospital records, and financial or taxpayer information.

☐

If any of my contact information changes during the complaint process, it is my responsibility to inform the Information Regulator; otherwise my complaint could experience a delay or even be closed.

Signed at _____ this _____ day of _____ 20 _____

Complainant/Representative/Authorised person of Third party



**INFORMATION
REGULATOR
(SOUTH AFRICA)**

*Ensuring protection of your personal information
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P.O. Box 31533
Braamfontein, Johannesburg, 2017
Tel: 010 023 5200
Email: PAIACompliance@infoRegulator.org.za

REQUEST FOR ASSESSMENT

FORM 13

[Regulation 14(1)]

I,

Full Name(s)				
Postal Address				
Street Address				
E-Mail Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			

hereby, in terms of section 77H of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), request that the Information Regulator assess whether the under-mentioned public or private body generally complies with the provisions of the Act insofar as its policies and implementation procedures are concerned.

Name of Private / Public Body				
Postal Address				
Street Address				
E-Mail Address				
Contact Number(s)	Tel. (B)		Facsimile	
	Cellular			

PARTICULARS OF INFORMATION TO BE ASSESSED
PERSONS AFFECTED BY THE RELEVANT INFORMATION PRACTICE/S
THE REASON WHY AN ASSESSMENT IS REQUESTED
SPECIFIC ASPECTS OF THE INFORMATION THAT THE ASSESSMENT SHOULD ADDRESS

Signed at _____ this _____ day of _____ 20 _____

Requester

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, 2017**
[Regulation 2(1)]

Note:

1. Affidavits or other documentary evidence in support of the objection must be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number....

A	DETAILS OF DATA SUBJECT
Name and surname of data subject:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party (if the responsible party is a natural):	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

Name of public or private body(<i>if the responsible party is not a natural person</i>):	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR OBJECTION (<i>Please provide detailed reasons for the objection</i>)

Signed at this day of20.....

.....
Signature of data subject (applicant)

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, 2017
[Regulation 3(2)]

Note:

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

Reference Number....

Mark the appropriate box with an "x".

Request for:

☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party (if the responsible party is a natural person):	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

Name of public or private body (if the responsible party is not a natural person):	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY. (Please provide detailed reasons for the request)

* Delete whichever is not applicable

Signed at this day of20.....

.....
Signature of Data subject