



CAPE TOWN SPURS FOOTBALL CLUB (PTY) LTD

(REGISTRATION No.: 1998/024537/07)

MANUAL

In terms of the Prescribed Provisions of

The Promotion of Access to Information Act 2 of 2000

(the "PAIA")

And

The Protection of Personal Information Act 4 of 2013

(the POPIA")

CAPE TOWN SPURS FOOTBALL CLUB (PTY) LTD

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Tel.: +27 21 930 6001 - info@capetownspurs.co.za - www.capetownspurs.co.za - Reg. No. 1998/024537/07



1. Introduction

- 1.1 Cape Town Spurs Football Club (Pty) Ltd (“Spurs”) is a company registered in accordance with the laws of the Republic of South Africa and conducting business as a professional football club.
- 1.2 Section 32 of the Constitution of the Republic of South Africa, 1996 guarantees everyone’s right of access to any information held by the State or held by any other person that is to be used for the protection or exercise of any right.
- 1.3 The Promotion of Access to Information Act 2 of 200 (“PAIA”) imposes certain obligations on private bodies in respect of the right to access to information. Section 51 of the PAIA requires Spurs, a private body, to compile a manual giving information to the public regarding the procedure to be followed in requesting information from us for the purpose of exercising or protecting rights.
- 1.4 This manual is one of Spurs’ commitments to complying with the law and promoting the rights enshrined in the Bill of Rights, particularly the right to access to information and to foster a culture of transparency and accountability. It is designed to ensure that members of the public have effective access to information in Spurs’ possession which will assist them in the exercise and protection of their rights.

2. Purpose

- 2.1 The PAIA gives effect to the constitutional right of access to information.
- 2.2 The purpose of this Manual is to outline the procedure to be followed by any person requesting access to records held by Spurs (“Requester”) and the way a request for access to records will be facilitated by Spurs. Inside these pages you will be able to view the categories of information which we possess. You will also be shown the correct procedure to follow should you require access to any of this information.

3. Availability of this Manual

- 3.1 This Manual is published on the Spurs’ website at www.capetownspursfc.com alternatively a copy can be requested from the Information Officer.
- 3.2 This Manual is further available at the offices of SAHRC and at the offices of Spurs for inspection during normal business hours. No fee will be levied for the inspection. However, a fee will be levied for copies of this Manual in accordance with the PAIA.

4. Company Details

NAME	Cape Town Spurs Football Club (Pty) Ltd
REGISTRATION NO.	1998/024537/07
POSTAL ADDRESS	P.O. Box 926, Parow, 7499
PHYSICAL ADDRESS	Cnr Frans Conradie Drive and Bertie Genade Street, Parow 7500
EMAIL ADDRESS	info@capetownspurs.co.za
WEBSITE	www.capetownspurs.co.za
TELEPHONE	(021) 930 6001

5. Designated Information Officer

- 5.1 The PAIA prescribes the appointment of an Information Officer, wherein such Information Officer is responsible to assess and facilitate requests for access to information.



- 5.2 The details of the designated Information Officer of Spurs who deals with all matters in connection with requests for information are as follows:

Name: Coenrad Christoffel Johannes Fourie – Information Officer

Physical address: Cnr of Frans Conradie Drive and Bertie Genade Street, Parow 7500

Telephone: (021) 930 6001

Email address: coenradf@capetownspurs.co.za

- 5.3 The details of the designated Deputy Information Officer of Spurs who deals with all matters in connection with requests for information in the absence of the designated Information Officer, in terms of the PAIA are as follows:

Name: Eleftherios Andalis – Deputy Information Officer

Physical Address: Cnr Frans Conradie Drive and Bertie Genade Street, Parow, 7500

Email: terrya@capetownspurs.co.za

Telephone: (021) 930 6001

6. The Promotion of Access to Information Act (PAIA)

- 6.1 The PAIA grants a Requester access to records of a private body such as Spurs, if the record is required for the exercise or protection of any rights. Public bodies are also permitted to lodge a request however should a public body lodge a request, the public body must be acting in the public interest.
- 6.2 Requests in terms of the PAIA shall be made in accordance with the prescribed procedures where there are fees payable, the fees and tariff are dealt with in paragraph 13 below.
- 6.3 Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission. The Guide is available from the SAHRC.
- 6.4 Any enquiries regarding this Guide should be directed to:

Contact Body:	The South African Human Rights Commission The PAIA Unit (The Research and Documentation Department)
Postal Address:	Private Bag X2700, Houghton 2041
Telephone Number:	011-877 3600
Fax Number:	011-403 0625
Website:	www.sahrc.org.za

7. Applicable Legislation

- 7.1 Certain legislation provides that private bodies shall allow certain persons access to specified records, upon a reasonable request. The legislation applicable to Spurs that may be consulted to establish whether the Requester has a right of access to a record other than in terms of the procedure set out in PAIA include:

Administration of Adjudication of Road Traffic Offences Act 46 of 1998; Basic Conditions of Employment Act 75 of 1997; Broad-based Black Economic Empowerment Act 53 of 2003; Companies Act 71 of 2008; Compensation for Occupational Injuries and Diseases Act 130 of 1993; Competition Act 89 of 1998; Constitution of South Africa Act 108 of 1996 Consumer Protection Act 68 of 2008; Copyright Act 98 of 1987; Custom and Excise Act 91 of 1964; Electronic Communications Act 36 of 2005; Electronic Communications and Transactions Act 2 of 2000; Electronic Communications and Transactions Act 25 of 2002; Employment Equity Act 55 of 1998; Environmental Conservation Act 73 of 1989; Financial Intelligence Act 38 of 2001; Firearms Control Act of 2000; Income Tax Act 58 of 1962; Insolvency Act 24 of 1936; National Credit Act 34 of 2005; Labour Relations Act 66 of 1995; Long-term Insurance Act 52 of 1998; National Road Traffic Act 93 of 1996; National Sport and Recreation Act 110 of 1998; Occupational Health and Safety Act 85 of 1993; Patents Act 57 of 1987; Pension Funds Act 24 of 1956; Prevention and Combating of Corrupt Activities Act 12 of 2004; Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000; Protected Disclosures Act 26 of 2000; Protection of Personal Information Act 4 of 2013; Regulation of Interception of Communications and Provisions of Communication Related Information Act 70 of 2002; Safety at Sports and Recreational Events Act 2 of 2010; Skills Development Act 97 of 1997; Skills Development Levy Act 9 of 1999; South African Reserve Bank Act 90 of 1989; Telecommunications Act 103 of 1996; Trademarks Act 194 of 1993; Unemployment Insurance Act 63 of 2001; Unemployment Insurance Fund Contributions Act 4 of 2002; Value Added Tax Act 89 of 1991.

- 7.2 Spurs has prepared the above list using its best endeavours. This list may be incomplete. Consequently, Spurs shall endeavour to supplement the list regularly and whenever it comes to Spurs' attention that certain existing legislation allows a Requester access to records in addition to the PAIA and the legislation listed above. Where a Requester is of the view that there is other legislation that grants the Requester a right to request access to records held by Spurs, the Requester may request access to the records and should specify the legislation relied upon.

8. Schedule of records that we hold

8.1 STATUTORY COMPANY INFORMATION

Certificate of Incorporation; Certificate of Change of Name; Memorandum and Articles of Association; Certificate to Commence Business; Minute Book, CM25, CM26 and CM29 forms, as well as Resolutions passed at general/class meetings; Proxy forms; Proxy forms used at Court convened meetings; a Register of allotments; Register of Mortgages and Debentures and Fixed Assets; Register of Directors' shareholdings; Register of Directors and Certain Officers; Annual Financial Statements including: Annual accounts; Directors' reports; Auditor's report. Books of Account regarding information required by the Companies Act, 2008; Supporting schedules to books of account and ancillary books of account.

8.2 ACCOUNTING RECORDS

Books of Account including journals and ledgers; orders, invoices, statements, receipts, vouchers and bills of exchange.

8.3 **STATUTORY EMPLOYEE RECORDS**

Employees' names and occupations; Time worked by each employee; Remuneration paid to each employee.; Date of birth of each employee; Attendance register; Salary and wages register; Records of foreign employees; Collective agreements; Arbitration awards; Determination made in terms of the Wages Act; Staff records (after date of employment ceases); Expense account.

8.4 **OTHER EMPLOYEE RECORDS**

Employee contracts; Maternity leave policy; Code of Conduct

8.5 **ENVIROMENTAL HEALTH AND SAFETY**

Permits, licences, approvals and registration for operations of sites and businesses; Emergency response plans.

8.6 **FIXED PROPERTY**

Building plans; Leases.

8.7 **MOVABLE PROPERTY**

Asset register; Finance and lease agreements; Notarial bonds; Deeds of Pledge.

8.8 **INTELLECTUAL PROPERTY**

Patents, patent applications and inventions; Trademarks, trademarks and protected names; Copyrights; Agreements relating to intellectual property such as licence agreements, secrecy agreements, research and development, consulting agreements, use agreements, joint venture agreements and joint development agreements; Litigation and other disputes involving intellectual property.

8.9 **AGREEMENTS AND CONTRACTS**

Material agreements concerning provision of services or materials; Joint venture agreements, participation, co-marketing, co-promotion, or other alliance agreements; Agreements with shareholders, officers or directors; Acquisition or disposal documentation; Agreements with contractors and suppliers; Agreements with customers; Warranty agreements; Sale agreements; Distributor, dealer or agency

agreements; Restraint agreements; Agreements with governmental agencies; Purchase or lease agreements.

8.10 TAXATION

Copies of all Income Tax Returns and other tax returns and documents.

8.11 LEGAL

Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation; Settlement agreements; Material licences, permits and authorisations.

8.12 INSURANCE

Insurance policies; Claim records; Details of insurance coverages, limits and insurers.

8.13 TRANSPORTATION

Transportation rights; Permits.

8.14 INFORMATION TECHNOLOGY

Hardware; Operating Systems; Telephone Exchange Equipment; Telephone Lines, Leased Lines and Data Lines; LAN Installations; Software Packages; Disaster recovery; Internal Systems Support and Programming / Development; Capacity and utilization of current systems; Development or investment plans; Licenses; Audits.

8.15 SALES AND MARKETING

Products; Markets; Customers; Brochures, newsletter and advertising material; Sales; Public relation policies and procedures; domestic and export orders.

The above categories or subject matters have been specified in this Manual as an indication of the kinds of records that Spurs keeps. The listing of these categories or subject matters does not imply that a request for access to such records will always be granted. All requests for access will be evaluated on a case by-case basis on their own merits, and Spurs reserves the right to decline to grant access to records in accordance with the provisions of the PAIA.

9. Procedures for request of records

9.1 A Requester must comply with all the procedural requirements as contained in section 53 of PAIA relating to a Request for Access to a Record.

9.2 A Requester must complete the Prescribed Request Form below and submit the completed Request Form as well as payment of a request fee (if applicable) and a deposit (if applicable), to the Information Officer.

9.3 The Request Form must be completed with enough detail so as to enable the Information Officer to identify the following:

9.3.1 the Record/s requested;

9.3.2 the identity of the Requester;

9.3.3 any affected parties;

9.3.4 the form of access that is required, if the request is granted;



- 9.3.5 the postal address or email address of the Requester;
- 9.3.6 the right that the Requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.
- 9.4 If a Request for Access is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the reasonable satisfaction of the Information Officer.
- 9.5 A Requester who is unable to complete the prescribed form because of illiteracy or disability may make a request orally directly to the Information officer.

10. Decision to grant access to records

- 10.1 Spurs has the authority to decide whether to grant or decline the Request within 30 days of receipt of the Request Form and will give notice to the Requester with reasons (if required) to that effect.
- 10.2 The period referred to above may be extended for a further period of not more than 30 days if the request is for a large number of Records or the request requires a search for Records and the Records cannot reasonably be obtained within the original 30-day period.
- 10.3 Spurs will notify the Requester in writing should an extension of time as contemplated above be required.
- 10.4 If, in addition to a written reply from the Information Officer, the Requester wishes to be informed of the decision on the Request in any other manner, the Requester must state the manner and particulars so required.

11. Grounds for Refusal of Access to records in terms of PAIA

- 11.1 Spurs may, subject to the exceptions contained in Chapter 4 of Act, refuse a request in accordance with Chapter 4 of PAIA on the following grounds:
 - 11.1.1 mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
 - 11.1.2 mandatory protection of the commercial information of a third party, if the Records contain:
 - 11.1.2.1 trade secrets of that third party;
 - 11.1.2.2 financial, commercial, scientific, or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 11.1.2.3 information disclosed in confidence by a third party to Spurs, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
 - 11.1.3 mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
 - 11.1.4 mandatory protection of the safety of individuals and the protection of property;
 - 11.1.5 mandatory protection of Records that would be regarded as privileged in legal proceedings;

- 11.1.6 protection of the commercial information of Spurs, which may include:
 - 11.1.6.1 trade secrets;
 - 11.1.6.2 financial/commercial, scientific, or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of Spurs;
 - 11.1.6.3 information which, if disclosed, could put Spurs at a disadvantage in contractual or other negotiations or prejudice Spurs in commercial competition; and/or
 - 11.1.6.4 computer programs which are owned by Spurs, and which are protected by copyright and intellectual property laws.
- 11.1.7 research information of Spurs or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
- 11.1.8 requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

12. Remedies available to the Requester upon refusal of a request for access in terms of PAIA

- 12.1 The decision made by the Information Officer is final and there is no internal appeal procedure. Requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.
- 12.2 In accordance with sections 56(3)(c) and 78 of PAIA, a Requester may apply to a court for relief within 180 days of notification of the decision for appropriate relief.

13. Fees

- 13.1 When the Request is received by the Information Officer, the Information Officer may by notice require the Requester, other than a Personal Requester, to pay the prescribed request fee (if any), before further processing of the Request.
- 13.2 The Information Officer will withhold a Record until the Requester has paid the fees as indicated below.
- 13.3 A Requester whose Request to a Record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the Record for disclosure, including deciding to make it available in a requested form provided for in the PAIA.
- 13.4 If a deposit has been paid in respect of a Request for Access which is refused, the Information Officer will refund the deposit to the Requester.
- 13.5 The PAIA provides for two types of fees, namely:
 - 13.5.1 A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and it is not refundable; and
 - 13.5.2 An access fee, which is paid by all requesters in the event that a request for access is granted. This fee is inclusive of costs involved in obtaining and preparing a record for delivery to the requester.

13.6 **Reproduction Fee**

Reproduction of Information Fees	Fees to be charged
Information in an A-4 size page photocopy or part thereof	R1,10
A printed copy of an A-4 page or part thereof	R0,75
A scanned copy (in computer-readable format)	R70,00
A transcription of visual images, in an A-4 size page or part thereof	R40,00
A copy of visual images	R60,00
A transcription of an audio record for an A-4 size page or part thereof	R20,00
A copy of an audio record	R30,00

13.7 **Access Fees**

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act or an exclusion is determined by the Minister in terms of section 54(8).

The applicable access fees which will be payable are:

Access of Information Fees	Fees to be charged
Information in an A-4 size page photocopy or part thereof	R1,10
A printed copy of an A-4 size page or part thereof	R0,75
A scanned copy (in computer-readable format)	R7,50
Stiffy disc	R70,00
Compact Disc	
A transcription of visual images, in an A-4 size page or part thereof	R40,00
A copy of visual images	R60,00
A transcription of an audio record for an A-4 size page or part thereof	R20,00
A copy of an audio record	R30,00*
*Per hour or part of an hour reasonably required for such search	
Where a copy of a record needs to be posted the actual postal fee is payable.	

14. PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY SPURS

14.1 In terms of Chapter 3 of Protection of Personal Information Act 2013, certain minimum conditions for lawful processing of personal information by a Responsible Party must be complied with. These minimum conditions may not be departed from unless specific exclusions apply as outlined in POPIA.

14.2 Spurs needs and collects Personal Information relating to both natural and juristic persons in order to carry out its business and organisational functions and comply with the requirements of various regulators. The manner in which this information is processed, stored and the purpose for which it is processed is determined by Spurs. As a Responsible Party for the purposes of POPIA, Spurs will ensure that the Personal Information of a Data Subject:



- 14.2.1 is processed lawfully, fairly, and transparently in compliance with the POPIA. In this regard, Spurs will always provide appropriate information to data subjects when their data is collected by Spurs, the legal basis for which the information is collected, and consent to process Personal Information;
- 14.2.2 is processed only for the purposes for which it was collected by Spurs and is processed in accordance with integrity and confidentiality principles, ensuring that the Personal Information is subject to an appropriate level of security when stored, used and communicated by Spurs, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- 14.2.3 will not be processed for any other purpose unless that processing is compatible with the original purpose.
- 14.2.4 is adequate and relevant for the purposes for which it was collected;
- 14.2.5 is accurate and kept up to date at all times;
- 14.2.6 is kept safe and will not be kept for longer than necessary;
- 14.2.7 is processed in accordance with the rights of data subjects, where applicable. Data subjects have the right to:
 - 14.2.7.1 be notified that their Personal Information is being collected by Spurs;
 - 14.2.7.2 has the right to be notified in the event of a data breach;
 - 14.2.7.3 know whether Spurs holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual in particular as set out in the PAIA section above;
 - 14.2.7.4 request the correction or deletion of any inaccurate, irrelevant, out of date, incomplete, misleading, or unlawfully obtained personal information;
 - 14.2.7.5 object to Spurs' use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to Spurs' record keeping requirements);
 - 14.2.7.6 object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
 - 14.2.7.7 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 non-compliance with the protection of his, her or its personal information.

14.3 Purpose of the Processing of Personal Information by Spurs

As outlined above, Spurs will only process Personal Information for a specific purpose. The purposes for which Spurs processes or will process Personal Information is set out in **Schedule 2**.



14.4 Categories of Data Subjects

A data subject may either be a natural or a juristic person. The various categories of data subjects that Spurs processes Personal Information on and the types of Personal Information relating thereto are set out in **Schedule 3**.

14.5 Recipients of Personal Information

Spurs may provide a data subject's Personal Information to include Spurs' affiliates, commercial partners or sponsors, government departments, football regulators such as the National Soccer League, the South African Football Association.

14.6 Cross-border flows of Personal Information

14.6.1 Section 72 of POPIA prescribes the conditions under which Personal Information may be transferred out of the Republic of South Africa. These are if:

14.6.1.1 The recipient country has data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA and can offer such data an "adequate level" of protection; or

14.6.1.2 Data subject consents to the transfer of their Personal Information; or

14.6.1.3 transfer is necessary for the performance of a contractual obligation between the data subject and the Responsible Party; or

14.6.1.4 transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the data subject; or

14.6.1.5 the transfer is for the benefit of the data subject, and it is not reasonably practicable to obtain the consent of the data subject, and if it were, the data subject, would in all likelihood provide such consent.

14.6.2 When making authorised disclosures or transfers of personal information in terms of section 72 of POPIA, Personal Data may be disclosed to recipients located in countries which do not offer a level of protection for those data subjects as high as the level of protection as South Africa.

14.7 Information Security Measures

14.7.1 Spurs undertakes to institute and maintain the data protection measures to accomplish the objectives outlined below. The details given are examples of how to achieve an adequate data protection level for each objective.

14.7.2 Spurs may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

14.7.2.1 Access Control of Persons - Spurs shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

- 14.7.2.2 Data Media Control - Spurs undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by Spurs and containing personal data of Data Subjects.
- 14.7.2.3 Data Memory Control - Spurs undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorized reading, alteration or deletion of stored data.
- 14.7.2.4 User Control - Spurs shall implement suitable measures to prevent its data processing systems from being used by unauthorized persons by means of data transmission equipment.
- 14.7.2.5 Access Control to Data - Spurs represents that the persons entitled to use Spurs' data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorization).
- 14.7.2.6 Transmission Control - Spurs shall ensure the verification and tracing of the locations / destinations to which the personal information is transferred by utilization of Spurs' data communication equipment / devices.
- 14.7.2.7 Transport Control - Spurs shall implement suitable measures to prevent Personal Information from being read, copied, altered, or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.
- 14.7.2.8 Organization Control - Spurs shall maintain its internal organization in a manner that meets the requirements of this Manual.

14.7.3 Spurs will continuously assess the suitability of the information security measures implemented or to be implemented by Spurs and make the necessary adjustments in order to ensure that the Personal Information that is processed by Spurs is safeguarded and processed in accordance with the Conditions for Lawful Processing.

14.8 Objection to the Processing of Personal Information by a Data Subject

Section 11 (3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this Manual Schedule 4 subject to exceptions contained in POPIA.

14.9 Request for correction or deletion of Personal Information

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached to this Manual as Schedule 5.

14.10 Deposits

Where Spurs receives a request for access to information held and if the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit will be payable by the Requester. The Information Officer shall inform the Requester of the applicable deposit and how it must be paid.



REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000)

[Regulation 10]

- A. Addressed to**
Cape Town Spurs Football Club (Pty) Ltd
Attention: Mr. Coenrad Christoffel Johannes Fourie – Information Officer
Cnr of Frans Conradie Drive and Bertie Genade Street
Parow, 7500
Email: coenradf@capetownspurs.co.za
OR
Cape Town Spurs Football Club (Pty) Ltd
Attention: Mr. Eleftherios Andalis – Deputy Information Officer
Cnr of Frans Conradie Drive and Bertie Genade Street
Parow, 7500
Email: terrya@capetownspurs.co.za

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
(b) The address and/or fax number in the Republic to which the information is to be sent must be given.
(c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:

Identity number:

Postal address:

Fax number:

Telephone number: _____ E-mail address: _____

Capacity in which request is made, when made on behalf of another person: _____

C. Particulars of person on whose behalf request is made

This section must be completed *ONLY* if a request for information is made on behalf of another person.

Full names and surname:

Identity number:



D. Particulars of record

(d) 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.

(e) If the provided space is inadequate, please continue on a separate folio and attach it to this form.

(f) The requester must sign all the additional folios.

- 1 Description of record or relevant part of the record:

- 2 Reference number, if available:

- 3 Any further particulars of record:

E. Fees

(a) A request for access to a record, other *than* a record containing personal information about yourself, will be processed only after a request fee has been paid.

(b) You will be *notified of* the amount required to be paid as the request fee.

(c) The fee payable for access to a record depends *on* the form *in which* access is required and the reasonable time *required* to search for and prepare a record.

(d) If you qualify for exemption *of* the payment *of* any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:	Form in which record is required
Mark the appropriate box with an X.		
NOTES:		
(a) Compliance with your request in the specified form may depend on the form in which the record is available.		



- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:			
copy of record*		inspection of record	
2. If record consists of visual images			
This includes photographs, slides, video recordings, computer-generated images, sketches, etc).			
view the images		copy of the images"	transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
listen to the soundtrack		transcription of soundtrack*	
audio cassette		written or printed document	
4. If record is held on computer or in an electronic or machine-readable form:			
printed copy of record*		printed copy of information derived from the record"	copy in computer readable form* (stiffy or compact disc)
If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.			YES
			NO

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:
2. Explain why the record requested is required for the exercise or protection of the aforementioned right:



H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at.....this.....day of20.....

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE



SCHEDULE 2

PROCESSING OF PERSONAL INFORMATION IN ACCORDANCE WITH POPIA

Purpose of the Processing of Personal Information	Type of Processing
<ol style="list-style-type: none">1. To undertake activities related to Spurs' business activities:<ol style="list-style-type: none">1.1. to fulfil foreign and domestic legal, regulatory and compliance requirements and comply with any applicable treaty or agreement with or between foreign and domestic governments applicable to Spurs.1.2. to verify the identity of data subjects;1.3. for risk assessment, information security management, statistical, trend analysis and planning purposes;1.4. for crime detection, prevention, investigation, and prosecution;1.5. to enforce or defend Spurs' rights; and1.6. to manage Spurs' relationship with the data Subject.2. The purposes related to any authorised disclosure made in terms of agreement, law or regulation;3. Any additional purposes expressly authorised by the data subject; and4. Any additional purposes as may be notified to the data subjects in any notice provided by Spurs.	Collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

SCHEDULE 3

Categories of Data Subjects and categories of Personal Information relating thereto

Categories of Data Subjects of and categories of Personal Information relating thereto	Data Subject	Personal Information Processed
<p>Corporate</p> <p>Information including, account details, payment information, corporate structure, risk rating and other customer information including to the extent the categories of information relate to individuals or representatives of the entity (e.g., shareholders, directors, etc.) required for the above-mentioned purposes.</p> <p>Individual</p> <p>Name; contact details (E-Mail Address, Telephone Number, Facsimile Number, Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); regulatory identifiers (e.g. tax identification number); Account information (Bank Account Currency Code, Bank Account ID, Bank Account Name, Bank Account Number, Bank Account Type, Bank account balance); transaction details and branch details; "know your customer" data, photographs; other identification and verification data as contained in images of ID card, passport and other ID documents; images of individuals' signatures)</p>	<ul style="list-style-type: none"> • Natural Persons; • Juristic Persons. 	<p>Personal data relating to a Data Subject received by or on behalf of Spurs by the Data Subject, their respective representatives and related parties Data Subject's personal data may include names, contact details, identification and verification information, nationality and residency information, taxpayer identification numbers, bank account and transactional information (where legally permissible), to the extent that these amount to personal data under POPIA.</p>
<p>Personnel / Employees</p> <p>Name; employee ID/Passport number; business contact details (address/telephone number/email address) Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); Medical aid Number; regulatory identifiers (e.g. tax identification number); Account information (Bank Account Currency Code, Bank Account Id, Bank Account Name, Bank Account Number, Bank Account Type, Bank account balance); transaction details.</p>		

SCHEDULE 4

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

Note:

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

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal, or business address:	
Contact number(s):	
E-mail address:	

B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of data subject:	
Residential, postal, or business address:	
Contact number(s):	



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

Signed at this day of 20

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Signature of data subject/designated person



SCHEDULE 5

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 REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

Note:

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

Mark the appropriate box with an "x".

Request for:

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 DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of data subject:	

Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection).
D	REASONS FOR CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. (Please provide detailed reasons for the request).

Signed at this day of 20

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Signature of data subject/designated person

