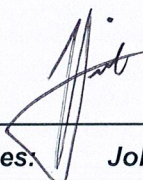


PAIA MANUAL

This manual was prepared in accordance with sections 14 and 51 of the Promotion of Access to Information Act, No. 2 of 2000 (as amended) as supplemented with additional requirements imposed by, and to address requirements of, the Protection of Personal Information Act, No 4 of 2013

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Issued by (Signature of Information Officer)



Full Names: *Johann Andries Smit*
Designation: *Information Officer*
Managing Director
Approval Date: 27 / 03 / 2026

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1 INTRODUCTION

- 1.1 Delta Instore Proprietary Limited ("**Delta**") is a private company and conducts the business of designing and manufacturing retail displays and shelving.
- 1.2 This manual is published in terms of section 51 of PAIA ("**this Manual**") and provides an outline of the type of records and personal information which Delta holds. This Manual also explains how to submit requests for access to these records in terms of PAIA. In addition to explaining how to access, or object to, personal information held by Delta, or request correction of personal information held by Delta, in terms of sections 23 and 24 of POPIA, this Manual also explains how to submit requests for access to these records in terms of PAIA.
- 1.3 The objective of PAIA is to give effect to the constitutional right to access to information, which information is held by a public or private body and which information is required for the exercise or protection of any rights. PAIA recognises the right entrenched in section 32 of the Constitution of the Republic and aims to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information.
- 1.4 Accordingly, requests for access to information held by Delta shall be made in accordance with the prescribed procedures and at the rates provided, as advised below in this Manual.

2 LIST OF ACRONYMS AND ABBREVIATIONS

- 2.1 "**IO**" Information Officer;
- 2.2 "**DIO**" Deputy Information Officer;
- 2.3 "**PAIA**" Promotion of Access to Information Act, No. 2 of 2000 (as Amended);
- 2.4 "**POPIA**" Protection of Personal Information Act, No. 4 of 2013;
- 2.5 "**Regulator**" Information Regulator; and
- 2.6 "**Republic**" Republic of South Africa.

3 PURPOSE OF PAIA MANUAL

- 3.1 This PAIA Manual is useful for the public to-
- 3.2 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;



- 3.3 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;
- 3.4 know the description of the records of the body which are available in accordance with any other legislation;
- 3.5 access all the relevant contact details of the IO and DIO who will assist the public with the records they intend to access;
- 3.6 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.7 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;
- 3.8 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.9 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.10 know if the body has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.11 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4 KEY CONTACT PARTICULARS FOR ACCESS TO INFORMATION OF DELTA

4.1 IO

Name: **Johann Andries Smit**
Tel: **011 422 1882**
Email: **johann@deltainstore.co.za**

4.2 DIO

Name: **Melissa Catherine Smit**
Tel: **011 422 1882**
Email: **melissa@deltainstore.co.za**

4.3 Access to information general contacts

Email: info@deltainstore.co.za

4.4 Head Office

Postal Address: **Postnet Suite 1
Private Bag X5
Elspark
Germiston
1418**

Physical Address: **16 Toronto Street
Apex
Benoni
1501**

Telephone: **011 422 1882**

Cell phone: **070 683 1616**

WhatsApp: **070 683 1616**

Email: info@deltainstore.co.za

Website: www.deltainstore.co.za

5 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE, IN TERMS OF SECTION 10 OF PAIA

5.1 Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The prescribed forms and tariffs are dealt with in sections 53 and 54 of PAIA.

5.2 PAIA grants a requester access to certain records of a private body, if the records are required for the exercise or protection of any rights.

5.3 The Regulator has, in terms of section 10(1) of PAIA updated and made available the revised Guide on how to use PAIA ("**Guide**"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA, which will contain information for the purposes of exercising constitutional rights.

5.4 Requesters are referred to the Guide in terms of section 10 of PAIA.

5.5 The contact details of the Regulator are:

5.5.1 Physical Address: **Woodmead North Office Park, 54 Maxwell Drive,
Woodmead, Johannesburg, Gauteng, 2191**



- 5.5.2 Postal Address: **P.O Box 31533, Braamfontein, Johannesburg, 2017**
- 5.5.3 Telephone Number: **010 023 5200**
- 5.5.4 Fax: **086 500 3351**
- 5.5.5 Website: **inforegulator.org.za/**
- 5.6 The Guide is available in each of the official languages and in braille.
- 5.7 The aforesaid Guide contains the description of-
- 5.7.1 the objects of PAIA and POPIA;
- 5.7.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
- 5.7.2.1 the IO of every public body, and
- 5.7.2.2 every DIO of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 5.7.3 the manner and form of a request for-
- 5.7.3.1 access to a record of a public body contemplated in section 11³; and
- 5.7.3.2 access to a record of a private body contemplated in section 50⁴;
- 5.7.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 5.7.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 5.7.6 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-
- 5.7.6.1 an internal appeal;
- 5.7.6.2 a complaint to the Regulator; and

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

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

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

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

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



- 5.7.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 5.7.7 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;
- 5.7.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.7.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 5.7.10 the regulations made in terms of section 92¹¹.
- 5.8 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 5.9 The Guide can also be obtained-
- 5.9.1 upon request to the IO;
- 5.9.2 from the website of the Regulator (www.inforegulator.org.za).
- 5.10 A copy of the Guide is also available in the following official language, for public inspection during normal office hours-

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

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

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

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

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

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

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

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



5.10.1 English.

6 FACILITATION OF A REQUEST FOR ACCESS TO INFORMATION

Information which is not readily available as indicated in this Manual, may be requested in accordance with the procedure prescribed in terms of PAIA. Copies of the prescribed forms to be completed for submitting a request are available by request from Delta by contacting the IO (see contact details at paragraph 4 above) and are attached to the Privacy Policy published by Delta from time to time, and from the Regulator.

7 CATEGORIES OF RECORDS OF DELTA WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS AND INFORMATION AVAILABLE IN TERMS OF PAIA – ON REQUEST

7.1 Information which is available without a person having to request access, without having to complete the prescribed form and paying the requester's fee, will be made available at the offices of Delta (the particulars of which appear in paragraph 4 above) or in the manner requested, should this be reasonable and possible. The manner of access will include:

7.1.1 perusal with copying of material if needed and at the prescribed fee for copies;

7.1.2 access to visual, audio-visual material with a transcription, dubbing, copying or both, if required and if available.

7.2 Where records are kept in terms of any of the above legislation and same is of a public nature, these may, in certain circumstances, be available without the requirement of a request in terms of PAIA.

Category of records	Types of the Record	Available on Website	Available upon request
Marketing	Brochures, Delta's products, Product details on social media	X	X
Publicly filed records	Delta's company documents (including Certificate of Incorporation; Memorandum of Incorporation; Register of Directors and Officers) Title deeds		X



Information required by other legislation	PAYE, Skills Development Levies records, WCA record		X
Employee information	General employment policies and procedures		X
Other	Tax clearance certificate		X
Intellectual Property	Registration certificates		X

8 **DESCRIPTION OF THE RECORDS OF DELTA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

9 **DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY DELTA**

Subjects on which the body holds records	Categories of records
Human Resources	- HR policies and procedures - Employees records
Finance	- Annual Financial Statements - General financial records

10 **INFORMATION SUBJECT TO ACCESS RESTRICTIONS**

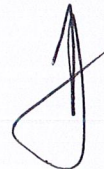
Access	Classification
May be Disclosed	Public Access Document
May not be Disclosed	Request after commencement of criminal or civil proceedings
May be Disclosed	Subject to copyright



Limited Disclosure	Personal Information of natural persons that belongs to the requester of that information, or personal information of juristic persons represented by the requestor of that information
May not be Disclosed	Unreasonable disclosure of personal information or of natural person
May not be Disclosed	Likely to harm the commercial or financial interests of a third party
May not be Disclosed	Likely to harm Delta or third party in contract or other negotiations
May not be Disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement
May not be Disclosed	Likely to compromise the safety of individuals or protection of property
May not be Disclosed	Legally privileged document
May not be Refused	Environmental testing / investigation which reveals public safety / environmental risks
May not be Disclosed	Commercial information of Private Body
May not be Disclosed	Likely to prejudice research and development information of Delta or a third party
May not be Refused	Disclosure in public interest

11 REQUESTING PROCEDURES

- 11.1 A person who wants access to the records of information not automatically available (as detailed above in paragraph 7) must complete the necessary prescribed form that is available at the offices of Delta or can be accessed on www.inforegulator.org.za). The completed prescribed request form must be sent to the address or fax number provided in this Manual and marked for the attention of the IO, with sufficient details to enable Delta to identify:



- 11.1.1 the record(s) requested;
- 11.1.2 the requester (and if an agent is lodging the request, proof of capacity);
- 11.1.3 the form of access required;
- 11.1.4 the postal address or fax number of the requester in the Republic;
- 11.1.5 if the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
- 11.1.6 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.

12 PRESCRIBED FEES

- 12.1 A requestor is required to pay the prescribed fees, in terms of PAIA, before a request will be processed.
- 12.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- 12.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- 12.4 Records may be withheld until the fees have been paid.
- 12.5 The fee structure is available on the website of the Regulator at www.inforegulator.org.za.

13 REMEDIES

- 13.1 Delta does not have an internal appeal procedure regarding PAIA and POPIA requests for access to information. As such, the decision made by the duly authorised person whose particulars appear in paragraph 4, is final.
- 13.2 If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Regulator, for relief.

14 PROTECTION OF PERSONAL INFORMATION PROCESSED

- 14.1 Pursuant to promoting responsible information processing practices within its organisation, as well as in its capacity as a responsible party contemplated in terms of the provisions of POPIA, Delta takes any activities relating to the protection and processing of personal information (as defined in terms of the provisions of section 1 of POPIA) seriously. To promote the constitutional right to privacy, as well as to play



its part in promoting the rights protected in terms of the POPIA, Delta undertakes to, in so far as is required of it, observe the requirements and conditions for the lawful processing of personal information.

- 14.2 Delta has dedicated policies and procedures in place to protect all personal information collected and processed by it. Kindly refer to Delta's Privacy Policy (available on its Website, at www.deltainstore.co.za) for more information on, among others, how Delta collects, processes, uses and discloses personal information ("**Privacy Policy**").

15 DISCLOSURES IN TERMS OF POPIA

- 15.1 POPIA requires that a data subject be notified or made aware of the following when Delta collects personal information of such data subject. Delta undertakes to notify a data subject of the following when collecting such data subject's personal information, unless POPIA or any other law provides otherwise:
- 15.1.1 the information being collected and where the information is not collected from the data subject, the source from which it is collected;
 - 15.1.2 the name and address of Delta;
 - 15.1.3 the purpose for which the information is being collected;
 - 15.1.4 whether or not the supply of the information by that data subject is voluntary or mandatory;
 - 15.1.5 the consequences of failure to provide the information;
 - 15.1.6 any particular law authorising or requiring the collection of the information;
 - 15.1.7 any further information such as the:
 - 15.1.8 recipient or category of recipients of the information;
 - 15.1.9 nature or category of the information;
 - 15.1.10 existence of the right of access to and the right to rectify the information collected;
 - 15.1.11 the existence of the right to object to the processing of personal information as referred to in section 11(3) of POPIA; and
 - 15.1.12 right to lodge a complaint to the Regulator and the contact details of the Regulator, which is necessary, having regard to the specific circumstances in which the information is or is not to be processed, to enable processing in respect of the data subject to be reasonable.



- 15.2 If Delta has previously taken the steps referred to in paragraph 15.1 (including its subparagraphs), complies with such paragraph in relation to the subsequent collection from the data subject of the same information or information of the same kind if the purpose of collection of the information remains the same.
- 15.3 It is not necessary for Delta to comply with paragraph 15.1 (including its subparagraphs), if:
- 15.3.1 the data subject or a competent person where the data subject is a child has provided consent for the noncompliance;
 - 15.3.2 noncompliance would not prejudice the legitimate interests of the data subject as set out in terms of POPIA;
 - 15.3.3 noncompliance is necessary:
 - 15.3.3.1 to avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution and punishment of offences;
 - 15.3.3.2 to comply with an obligation imposed by law or to enforce legislation concerning the collection of revenue as defined in section 1 of the South African Revenue Service Act, 1997 (Act No. 34 of 1997);
 - 15.3.3.3 for the conduct of proceedings in any court or tribunal that have been commenced or are reasonably contemplated; or
 - 15.3.3.4 in the interests of national security;
 - 15.3.3.5 compliance would prejudice a lawful purpose of the collection;
 - 15.3.3.6 compliance is not reasonably practicable in the circumstances of the particular case; or
 - 15.3.3.7 the information will:
 - 15.3.3.7.1 not be used in a form in which the data subject may be identified; or
 - 15.3.3.7.2 be used for historical, statistical or research purposes.
- 15.4 Delta has developed and published the Privacy Policy on its Website, in compliance with, among others, its obligations in terms of this paragraph 15 and all data subjects are required to make themselves aware of the contents of the Privacy Policy.

16 PURPOSE OF PROCESSING PERSONAL INFORMATION

Delta processes personal information for various purposes, including but not limited to the following:



16.1 Marketing and communication

- 16.1.1 Conducting surveys or research;
- 16.1.2 Posting photos of customers or employees on websites and social media;
- 16.1.3 Engaging with the public;
- 16.1.4 Promotion of goods and services.

16.2 Human resources and employment

- 16.2.1 Staff management and payroll administration;
- 16.2.2 Recruitment, employment, apprenticeship and training purposes;
- 16.2.3 Storing employee files and records;
- 16.2.4 Using employee data for pay reviews;

16.3 Legal and accounting

- 16.3.1 Financial and tax purposes;
- 16.3.2 Legal or contractual purposes;
- 16.3.3 Health and safety purposes;
- 16.3.4 General administration;
- 16.3.5 The institution and carrying on of legal proceedings if necessary;
- 16.3.6 Retain records in compliance with any applicable legislation;

16.4 Security and surveillance

- 16.4.1 Storing security camera (CCTV) footage;
- 16.4.2 Monitor access, secure and manage our premises and facilities;

16.5 Customer relationship management

- 16.5.1 Providing or managing information, goods and/or services requested by data subjects;
- 16.5.2 Facilitating the sale of goods and delivery of services to our clients;
- 16.5.3 Managing customer inquiries and complaints
- 16.5.4 Using contact details to deliver goods
- 16.5.5 Maintaining supplier records;



16.6 Data management and IT

- 16.6.1 Recording, storing and updating customer address details in an IT system;
- 16.6.2 Maintenance and destruction of documents containing personal data;
- 16.6.3 Accessing or consulting a contacts database.

17 DESCRIPTION OF THE CATEGORIES OF DATA SUBJECTS AND OF THE INFORMATION OR CATEGORIES OF INFORMATION RELATING THERETO

- 17.1 Delta may possess records relating to suppliers, shareholders, contractors/service providers, staff and clients:

Categories of Data Subjects	Personal Information that may be processed
Customers/Clients	Name, contact details, address, registration numbers or identity numbers, VAT numbers
Service Providers	Names, registration numbers, VAT numbers, address, Bank details, financial information, tax related information, authorised signatories, beneficiaries, ultimate beneficial owners
Employees	Address, gender, marital status, demographic information, age, financial information, employment history, ID number, physical and postal addresses, contact details, criminal record

18 THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED

- 18.1 Subject to any relevant terms and conditions of engagement or mandate which may be applicable when a data subject engages with Delta, we may share the personal information of any data subject we process for any of the purposes outlined in paragraph 16 above, with the following third parties, whether such third parties qualify as "responsible parties" in terms of section 1 of POPIA or not. These include but are not limited to:

- 18.1.1 Statutory authorities;
- 18.1.2 Law enforcement agencies;
- 18.1.3 Tax authorities;
- 18.1.4 Medical schemes;



- 18.1.5 Employee pension and provident funds;
- 18.1.6 Industry bodies;
- 18.1.7 Contractors, consultants, advisors, vendors, or suppliers, with whom Delta has an agreement;
- 18.1.8 Payment processors;
- 18.1.9 Email management and distribution tools;
- 18.1.10 Data storage providers;
- 18.1.11 Server hosts;
- 18.1.12 Group companies;
- 18.1.13 Any approved service providers or authorised agents who perform services on Delta's behalf.

19 PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

- 19.1 Delta will only transfer personal information across the Republic's borders when required for relevant business transactions or situations that necessitate trans-border processing, and will do so strictly in accordance with the Republic's legislative requirements or with the data subject's consent. We take reasonable steps to ensure that any third-party process operators are bound by laws, binding corporate rules, or agreements that provide an adequate level of protection and uphold the principles of reasonable and lawful processing of personal information as required by POPIA. Some personal information, including accounting backups containing customer information, may be stored in cloud environments outside the Republic.

20 GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY THE RESPONSIBLE PARTY TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF THE INFORMATION

- 20.1 Delta has identified its security risks over the personal information Delta processes in line with POPIA, and Delta has implemented reasonable technical and organisational measures for the security and protection of personal information processed by it. All backups are encrypted and protected by our service provider's internet security systems, which includes: Data Encryption, Anti-virus and Anti-malware Solutions.
- 20.2 When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject; that they are aware of the contents of this Manual and the Privacy Policy, and do not have any



objection to our processing their information in accordance with this Manual and/or the Privacy Policy. Specifically, and as provided for in Delta's Privacy Policy, Delta will collect a data subject's personal information from credit and trade references when a data subject applies for credit terms from Delta. Where the data subject applies for credit terms from Delta, the data subject provides its informed consent to Delta obtaining their personal information from any credit or trade reference or bureau.

21 AVAILABILITY OF THE MANUAL

21.1 A copy of the Manual is available-

21.1.1 on Delta's website (www.deltainstore.co.za), free of charge;

21.1.2 at the head office of Delta as recorded in paragraph 4 above, for public inspection during normal business hours;

21.1.3 to any person upon request and upon the payment of a reasonable prescribed fee as detailed herein.

21.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations to PAIA, shall be payable per each A4-size page in the photocopy of the Manual.

22 CONDITIONS OF LAWFUL PROCESSING

22.1 Delta has provided for its disclosures in respect of POPIA on the conditions for lawful processing of personal information, in its Privacy Policy.

23 UPDATING OF THE MANUAL

23.1 The IO, with the Board of Directors of Delta, shall on a regular basis update this Manual and should it be deemed necessary.

