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DRA GROUP SECTION 51 PAIA MANUAL

DRA (Pty) Ltd
2021/916057/07

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APPROVAL

Description	Name	Title	Signature	Date
Approved	James Smith	Chief Executive Officer / Information Officer		15 September 2026

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ABBREVIATIONS, TERMS, ACRONYMS AND DEFINITIONS

Abbreviations/Terms/Acronyms	Definition
CEO	Chief Executive Officer
DIO	Deputy Information Officer
DRA	DRA (Pty) Ltd, registration number 2021/916057/06, and its controlled entities
DRA Group	The South African DRA Group private bodies covered by this Manual (listed in Section 3)
Guide	Guide on how to use the Promotion of Access to Information Act 2 of 2000, as amended. The purpose of the Guide is to provide information that is needed by any person who wishes to exercise any right contemplated in PAIA and POPIA
IO	Information Officer
Manual	This Section 51 PAIA Manual
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
SARS	South African Revenue Service
UIF	Unemployment Insurance Fund
VAT	Value-added tax

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1 PURPOSE OF THIS PAIA MANUAL

This Manual has been prepared in terms of section 51 of PAIA. It is intended to assist members of the public to:

- Identify the private bodies covered by this Manual;
- Identify categories of records that are available without a formal PAIA request;
- Understand the subjects on which the DRA Group holds records and the categories of records held on each subject;
- Identify records that are created or maintained in accordance with other South African legislation;
- Obtain the contact details of the IO and DIOs who can assist with requests for access to records;
- Understand how to obtain and use the Regulator's Guide on PAIA;
- Understand the purposes for which the DRA Group processes personal information, the categories of data subjects and personal information processed, the categories of recipients, planned transborder flows, and the security safeguards applied; and
- Understand how to submit a request, the fees that may be payable, the grounds on which access may be refused and the remedies available.

Access to a record of a private body is subject to section 50 of PAIA. A requester must show that the record is required for the exercise or protection of a right, comply with the procedural requirements of PAIA, and the request must not be refused under an applicable ground in PAIA.

2 DRA GROUP OVERVIEW

The DRA Group is a multi-disciplinary engineering, project management and operations management group predominantly serving the mining, minerals and resources sector. Its services include mining, minerals and metals processing, project delivery, plant operations and maintenance, non-process infrastructure, water and energy solutions, and related advisory and technical services.

This is a consolidated PAIA Manual for the DRA Group entities listed in Section 3. Each listed company or trust remains a separate private body. The Manual is administered through the common IO and the relevant DIOs and contact channels identified in section 4.

3 PRIVATE BODIES COVERED BY THIS MANUAL

Business Grouping	Private Body	Registration Number
DRA	CCP Technical SA (Pty) Ltd	2007/035504/07
DRA	Concentrate Capital Partners (Pty) Ltd	2016/293401/07
DRA	DPXSA Management Holdings (Pty) Ltd	2020/637918/07
DRA	DRA Africa Holdings (Pty) Ltd	2007/028094/07
DRA	DRA Agriculture (Pty) Ltd	2015/057297/07
DRA	DRA Group Holdings (Pty) Ltd	1999/027606/07
DRA	DRA (Pty) Ltd	2021/916057/07
DRA	DRA Nexus SA (Pty) Ltd	2018/223660/07
DRA	DRA Projects Ethiopia (Pty) Ltd	2024/458303/07
DRA	DRA Projects (Pty) Ltd	2014/119088/07
DRA	DRA Projects SA (Pty) Ltd	2005/042496/07
DRA	DRA Shared Services SA (Pty) Ltd	2020/855839/07
DRA	DRA South Africa Group Holdings (Pty) Ltd	2020/605408/07
DRA	DRA South Africa Investment Holdings (Pty) Ltd	2020/920489/07

Business Grouping	Private Body	Registration Number
DRA	DRA South Africa Projects (Pty) Ltd	2020/625136/07
DRA	DRA Water Projects (Pty) Ltd	1974/003306/07
DRA	DRA Water SA (Pty) Ltd	2018/112519/07
Minopex	DRA Plant Operations Holdings (Pty) Ltd	2020/762423/07
Minopex	DRA Water Operations (Pty) Ltd	2016/240425/07
Minopex	Ensersa (Pty) Ltd	2008/025772/07
Minopex	Gold Operations Executive (Pty) Ltd	2012/016078/07
Minopex	LongMec Mokopane (Pty) Ltd	2025/678617/07
Minopex	LongMec Northern Cape (Pty) Ltd	2025/678645/07
Minopex	LongMec Phalaborwa (Pty) Ltd	2025/678561/07
Minopex	LongMec (Pty) Ltd	2021/443497/07
Minopex	LongMec West Rand (Pty) Ltd	2021/443112/07
Minopex	Minerals Operations Executive (Pty) Ltd	1988/004029/07
Minopex	Minopex East Africa Operations (Pty) Ltd	2025/872115/07
Minopex	Minopex Mining Operations (Pty) Ltd	2001/025397/07
Minopex	Minopex Operations Management (Pty) Ltd	2018/374999/07
Minopex	Minopex Supply Chain Services (Pty) Ltd	2017/540623/07
Minopex	Minopex Technical Advisory (Pty) Ltd	2018/402104/07
Minopex	MPXSA Management Holdings (Pty) Ltd	2020/637880/07
Minopex	Northern Cape Metallurgical Operations (Pty) Ltd	2017/456172/07
Minopex	Northern Cape Plant Operations (Pty) Ltd	2017/456132/07
Minopex	Quality Laboratory Services (Pty) Ltd	2008/004664/07
Minopex	South Coast Plant Operations (Pty) Ltd	2017/540499/07
Minopex	West Coast Plant Operations (Pty) Ltd	2011/003039/07
SENET	Earthstone Africa Investments (Pty) Ltd	2013/030595/07
SENET	New SENET (Pty) Ltd	2018/459169/07
SENET	Senergy Africa (Pty) Ltd	2018/204855/07
Trust	DRA Group Holdings Share Purchase Trust	000265/2011
Trust	Minopex Employee Empowerment Trust	IT003570/2025(G)

4 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Requests should be directed to the relevant contact channel below. The IO is the head of each applicable private body for PAIA purposes or is duly authorised to act in that capacity, as applicable.

4.1 Information Officer

Role	Name	Telephone	Email
Information Officer / Chief Executive Officer	James Smith	+27 11 202 8600	EMEADPO@draglobal.com

4.2 Deputy Information Officers

Role	Name	Telephone	Email
DRA (Pty) Ltd	Julie Gehle; Leanne Kirsten	+27 11 202 8600	julie@apexpartners.com; EMEADPO@draglobal.com
DRA and SENET	Leanne Kirsten; Seef le Roux	+27 11 202 8600	EMEADPO@draglobal.com
Minopex	Nicolette Uys	+27 11 785 7000	MinopexDPO@minopex.com

4.3 General Contact Details and Offices

Business Grouping	Physical Address	Postal Address	Telephone / Email / Website
DRA	Building 33, Woodlands Office Park, 20 Woodlands Drive, Sandton, 2080, South Africa	P.O. Box 3567, Rivonia, 2128, South Africa	+27 11 202 8600 https://www.draglobal.com/
Minopex	Building 31, Woodlands Office Park, 20 Woodlands Drive, Sandton, 2080, South Africa	P.O. Box 3567, Rivonia, 2128, South Africa	+27 11 785 7000 info@minopex.com https://minopex.com/
SENET	Building 12, Greenstone Hill Office Park / Emerald Boulevard, Greenstone, Modderfontein, Gauteng, 1609 / South Africa	P.O. Box 3567, Rivonia, 2128, South Africa	+27 11 409 1300 senet@senet.co.za https://www.senet.co.za/

5 GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Regulator has, in terms of section 10(1) of PAIA, updated and made available a Guide on how to use PAIA in an easily comprehensible form. The Guide assists persons who wish to exercise rights contemplated in PAIA and POPIA.

The Guide is available in all official languages and in braille. It explains, among other matters:

- The objects of PAIA and POPIA;
- The contact details of IOs and DIOs;
- The manner and form of a request for access to records of public and private bodies;
- Assistance available from IOs and the Regulator;
- Remedies available, including complaints to the Regulator and court applications;
- The requirements to compile and make PAIA manuals available;
- Voluntary disclosure of records;
- Fees payable; and

- The regulations made under PAIA.

The Guide may be inspected or obtained from the Regulator's website. A copy may also be requested from the relevant DIO using the contact details in section 4.

Regulator Contact	Details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	+27 10 023 5200
Toll-free	0800 017 160
General email	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

6 CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

The following records may be accessed without submitting Form 2 under PAIA. Availability may be subject to reasonable identity verification, applicable law, confidentiality restrictions and the format in which the record is held.

Category of Records	Types of Records	Available on Website	Available upon Request
Corporate and governance	This PAIA Manual; published privacy notices; published policies and governance statements	Yes	Yes
Marketing and communications	Brochures, capability statements, service information, media releases and public announcements	Yes	Yes
Careers	Published vacancies and general recruitment information	Yes	Yes
Sustainability and corporate reporting	Published sustainability, modern slavery and other public reports	Yes	Yes
Company information	Registered names, registration numbers, office and contact information	Yes	Yes
Companies Act inspection records	Records open for inspection under section 26 of the Companies Act, including the securities register and register of directors, subject to the statutory procedure and fee	No	Yes - statutory process
Supplier and client resources	Publicly issued supplier, client, ethics, privacy or speak-up guidance and forms	Where published	Yes

The fact that a category appears above does not mean that every record within that category is automatically available. Records containing confidential, privileged, personal, security-sensitive or third-party information may require a formal request or may be withheld as permitted by law.

7 RECORDS CREATED OR MAINTAINED IN ACCORDANCE WITH LEGISLATION

The DRA Group creates and maintains records required by legislation applicable to the particular entity, activity, project, workplace or transaction. The table is not exhaustive, and a listed record is not necessarily publicly accessible merely because it is created under legislation. Access remains subject to the applicable statute, PAIA and other legal restrictions.

Category of Records	Applicable Legislation
Constitutional documents, memorandum of incorporation, registers of directors and securities, shareholder and board records, annual financial statements and prescribed company records	Companies Act 71 of 2008 and Companies Regulations, 2011
Accounting records, invoices, tax returns, assessments, supporting documents, payroll tax records, VAT and other tax records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991
Employment contracts, remuneration and leave records, disciplinary and grievance records, policies and working-time records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995
Employment equity plans, reports and workforce demographic records	Employment Equity Act 55 of 1998
Skills development plans, workplace skills plans, training and levy records	Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999
UIF contribution and employee records	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002
Occupational injury and disease registrations, claims, earnings and incident records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Occupational health and safety policies, risk assessments, inspections, incidents, medical surveillance and training records	Occupational Health and Safety Act 85 of 1993 and applicable regulations; Mine Health and Safety Act 29 of 1996 where applicable
Construction and professional registrations, project records, statutory appointments and competency records	Construction Industry Development Board Act 38 of 2000; Engineering Profession Act 46 of 2000; Project and Construction Management Professions Act 48 of 2000
Environmental authorisations, impact and risk assessments, monitoring, waste, emissions, water and rehabilitation records, where DRA is legally responsible for them	National Environmental Management Act 107 of 1998 and applicable specific environmental management Acts; National Water Act 36 of 1998
B-BBEE certificates, verification records, ownership, procurement, enterprise and supplier development and employment records	Broad-Based Black Economic Empowerment Act 53 of 2003 and applicable Codes of Good Practice
Competition compliance, transaction and market-related records	Competition Act 89 of 1998
Anti-bribery and corruption policies, training, registers, due diligence, investigations and statutory reports where required	Prevention and Combating of Corrupt Activities Act 12 of 2004; Protected Disclosures Act 26 of 2000
Privacy notices, processing records, operator agreements, data-subject requests, security incident and breach records	Protection of Personal Information Act 4 of 2013 and Regulations
PAIA Manual, request forms, request register, decisions, correspondence and annual reporting records	Promotion of Access to Information Act 2 of 2000 and Regulations
Electronic communications, electronic contracting, website and electronic transaction records	Electronic Communications and Transactions Act 25 of 2002

Category of Records	Applicable Legislation
Cybersecurity incident, investigation and evidence records, where applicable	Cybercrimes Act 19 of 2020
Consumer agreements, marketing, complaints and product or service information, where applicable	Consumer Protection Act 68 of 2008
Copyright, trademark, licence and intellectual-property records	Copyright Act 98 of 1978; Trade Marks Act 194 of 1993
Records of legal proceedings, disputes, claims, affidavits and evidentiary material	Arbitration Act 42 of 1965; Prescription Act 68 of 1969; applicable court rules and legislation
Mineral, mining, plant-operation and project records where an entity has a statutory role or obligation	Mineral and Petroleum Resources Development Act 28 of 2002; Mine Health and Safety Act 29 of 1996 and applicable regulations

8 SUBJECTS ON WHICH THE DRA GROUP HOLDS RECORDS AND CATEGORIES OF RECORDS

Subject	Category of Records
Corporate governance and secretarial	• Incorporation and constitutional documents • Group and entity structures • Board, committee and shareholder agendas, minutes and resolutions • Registers, statutory returns, delegations and authorities • Policies, standards and governance frameworks • Trust deeds and trustee records
Strategy, risk and compliance	• Strategic plans and business plans • Enterprise and compliance risk assessments • Legal and regulatory registers • Audit, assurance and monitoring records • Anti-bribery, corruption, sanctions, competition, human-rights and modern-slavery records • Conflicts of interest, gifts and hospitality registers • Speak-up reports and investigation records • Training and awareness records
Finance, tax and treasury	• Annual financial statements and audit reports • General ledgers, journals and management accounts • Budgets, forecasts and cost records • Banking, treasury, payment and financing records • Invoices, purchase orders and expense records • Tax, VAT, payroll tax and statutory levy records • Asset and insurance records
Human resources and employment	• Employee and contractor files • Recruitment and pre-employment screening • Employment contracts and remuneration • Benefits, pensions and medical aid • Leave, attendance and time records • Performance, development and succession records • Disciplinary, grievance and employee-relations records • Employment equity and skills development records • Occupational health and medical surveillance records

Subject	Category of Records
Health, safety, security and environment	• HSE management systems, standards and procedures • Risk assessments, permits, inspections and audits • Incident, injury, disease and investigation records • Emergency response, security and travel-risk records • Environmental assessments, licences, monitoring and waste records • Training, competency and statutory appointment records
Projects, engineering and technical services	• Proposals, tenders and estimates • Project contracts, plans, schedules and reports • Design criteria, calculations, drawings, models and specifications • Engineering, procurement, construction and commissioning records • Quality plans, inspections, test results and non-conformance records • Project controls, cost, schedule and change records • Client deliverables and correspondence • Intellectual property and technical know-how
Plant operations and maintenance	• Operating and maintenance manuals • Production, process and plant performance records • Maintenance plans, work orders and asset records • Laboratory, sampling and quality-control records • Shift, safety, incident and operational reports • Consumables, spares and inventory records
Procurement and third parties	• Supplier and contractor master data • Requests for quotation, bids and evaluations • Contracts, service-level agreements and purchase orders • Third-party due diligence and risk assessments • Sanctions, adverse media and ownership screening • Supplier performance, audit and corrective-action records • Third party due-diligence questionnaires
Clients, business development and marketing	• Client and opportunity records • Proposals, bids and tender submissions • Contracts and commercial correspondence • Customer relationship management records • Marketing plans, website content and public communications • Client complaints and service feedback
Legal, contracts and disputes	• Material contracts and amendments • Confidentiality, joint venture and consortium agreements • Legal opinions and privileged communications • Claims, disputes, arbitration and litigation records • Regulatory licences, permits and approvals • Property leases and facilities agreements
Information technology and information management	• IT policies, standards, architecture and asset records • User, access and identity-management records • Systems, application and database records • Cybersecurity monitoring, incident and vulnerability records • Backup, disaster recovery and business continuity records • Data inventories, retention schedules and disposal records

Subject	Category of Records
	• Cloud, software and telecommunications contracts
Privacy and personal information	• Privacy notices, consent and lawful-basis records • Records of processing activities and information inventories • Data-subject access, correction, objection and deletion requests • Data-processing and operator agreements • Cross-border transfer assessments and safeguards • Personal-information security incidents and notifications • Privacy impact and risk assessments
Sustainability and ESG	• Sustainability governance, strategies and reports • Greenhouse-gas, energy, water, waste and other environmental data • Human-rights and modern-slavery assessments and statements • Stakeholder engagement and materiality records • Community, social investment and transformation records
Facilities and administration	• Property, office and facilities records • Visitor, access-control and CCTV records • Fleet, travel and accommodation records • Mail, document and records-management records • Business continuity and emergency records

9 PROCESSING OF PERSONAL INFORMATION

9.1 Purposes of Processing Personal Information

The DRA Group processes personal information for legitimate business, employment, legal and operational purposes, including to:

- Recruit, employ, manage, remunerate and support employees, workers and contractors;
- Provide engineering, project delivery, operations, maintenance and advisory services;
- Manage clients, suppliers, subcontractors, business partners and professional advisers;
- Conduct due diligence, screening, risk management, compliance monitoring and investigations;
- Comply with legal, regulatory, tax, corporate, employment, health and safety, security and reporting obligations;
- Protect people, premises, systems, assets, information and business operations;
- Administer finance, insurance, pensions, benefits, travel, facilities and information technology;
- Manage communications, websites, marketing, tenders and stakeholder relationships;
- Establish, exercise or defend legal rights and manage disputes; and
- Perform reporting, audit, assurance, analytics, business continuity, governance and record-keeping activities.

9.2 Categories of Data Subjects and Personal Information Processed

Categories of Data Subjects	Personal Information that may be Processed
Employees, former employees, job applicants, secondees, interns and dependants	Identity and contact details; demographic and diversity information; immigration and right-to-work information; qualifications and employment history; background-screening information; employment, payroll, tax, bank and benefits information; performance, disciplinary and grievance information; leave and attendance; health, disability, injury and medical-surveillance information; travel and emergency contacts; photographs, CCTV, access-control and IT usage information
Independent contractors and contingent workers	Identity, contact, company, tax and banking information; qualifications, experience, screening and due-diligence information; contract, performance, time, access-control, safety, travel and payment records
Clients, prospective clients and client representatives	Names, job titles, contact details, identification and authority information; communications, contracts, tenders, project and relationship information; due-diligence, screening and billing information
Suppliers, subcontractors, consultants, agents and other business partners, including their personnel and beneficial owners	Identity and contact details; registration, ownership and beneficial-ownership information; tax, banking and payment information; qualifications, licences and insurance; due diligence, sanctions, PEP, adverse-media, human-rights and modern-slavery information; contracts, performance and audit records
Directors, officers, shareholders, trustees and beneficiaries	Identity and contact details; appointments, declarations, interests and conflicts; shareholding, beneficial ownership and trust information; remuneration and governance records; screening and statutory information
Visitors and persons accessing DRA premises or systems	Identity, contact and host details; visitor logs; vehicle details; CCTV images; access-control, device and network information; health and safety information
Complainants, whistleblowers, witnesses and investigation subjects	Identity and contact details where provided; allegations, statements, evidence, case-management, investigation, disciplinary and remediation information; information may be processed confidentially or anonymously
Website users and communication recipients	Contact details; preferences; IP address, device, browser, cookie and usage information; website enquiries and communication records
Regulators, public officials, professional advisers and other stakeholders	Identity, role and contact details; correspondence, declarations, meeting, regulatory, legal and professional information
Regulators, public officials, professional advisers and other stakeholders	Identity, role and contact details; correspondence, declarations, meeting, regulatory, legal and professional information

9.3 Recipients or Categories of Recipients

Category of Personal Information	Recipients or Categories of Recipients
Identity, criminal, qualification, employment and integrity-screening information	Authorised background-screening providers, qualification bodies, previous employers, professional bodies, credit bureaus where lawful, and competent authorities
Employment, payroll, tax and benefits information	Payroll and HR providers; banks; SARS; UIF; compensation authorities; retirement funds; medical schemes; insurers; benefit providers; auditors and advisers
Health, safety, medical and travel information	Occupational health practitioners; medical providers; emergency, security, travel and assistance providers; insurers; clients and regulators where legally required
Client, project, engineering and operational information	Clients, consortium or joint-venture partners, contractors, professional advisers, technology and document-management providers, and regulators where required

Category of Personal Information	Recipients or Categories of Recipients
Supplier and third-party due-diligence information	Screening and due-diligence providers; clients; auditors; professional advisers; banks; insurers; regulators and law-enforcement authorities where required
IT, communications and security information	Cloud, hosting, cybersecurity, telecommunications, software, support, archiving and business-continuity providers
Legal, compliance, investigation and dispute information	External legal advisers, forensic specialists, auditors, insurers, courts, tribunals, arbitrators, regulators and law-enforcement authorities
Corporate and transaction information	Group companies, shareholders, lenders, insurers, auditors, advisers, prospective purchasers or investors, and relevant authorities, subject to confidentiality and law

9.4 Planned Transborder Flows of Personal Information

The DRA Group is an international group and may transfer, access, host or process personal information outside South Africa where this is necessary for Group administration, project delivery, client and supplier management, travel, technology services, cloud hosting, support, assurance, investigations or legal compliance. Recipient locations may include Australia, Canada, Chile, Peru, the United States, the United Kingdom, countries in the European Economic Area, Saudi Arabia and other countries in which DRA Group entities, clients, projects or approved service providers operate.

Categories transferred may include employee, contractor, client, supplier, project, financial, due-diligence, communications, security and IT information. The DRA Group applies section 72 of POPIA and uses appropriate safeguards, which may include adequacy assessments, binding agreements, data-protection clauses, access controls, transfer risk assessments and other lawful mechanisms. Transfers are limited to what is reasonably necessary for the relevant purpose.

9.5 General Description of Information Security Safeguards

The DRA Group maintains reasonable technical and organisational safeguards designed to preserve the confidentiality, integrity and availability of personal information, taking into account the nature of the information, the risks, available technology and implementation costs. Measures may include (but are not limited to):

- Information-security governance, policies, standards, risk assessments and accountability arrangements;
- Role-based access control, least privilege, user lifecycle management and periodic access reviews;
- Multi-factor authentication, password controls and privileged-access management;
- Encryption and other protective controls for information in transit and at rest where appropriate;
- Network, endpoint, email and cloud-security controls, anti-malware and vulnerability management;
- Logging, monitoring, incident detection, response, investigation and breach-notification procedures;
- Backups, resilience, disaster recovery and business continuity arrangements;
- Physical access controls, visitor management, secure storage and disposal;
- Employee confidentiality obligations, awareness and role-based training;
- Due diligence, contractual controls and oversight of operators and service providers;
- Data minimisation, retention schedules, secure deletion and records-management controls; and
- Periodic testing, assurance, audit and improvement of safeguards.

10 PROCEDURE FOR REQUESTING ACCESS TO RECORDS

10.1 Form and Submission

A requester must complete the prescribed Form 2: Request for Access to Record and submit it, with proof of identity and any proof of authority or capacity, to the relevant DIO at the email or physical address in section 4. Form 2 is available from the Regulator's website and may also be requested from the relevant DIO.

- The request must identify the record with sufficient detail to enable the DIO to locate it.
- The requester must identify the right to be exercised or protected and explain why the record is required for that purpose.
- Where a request is made on behalf of another person, proof of authority or capacity must be provided.
- The requester should specify the preferred form and manner of access and how the decision should be communicated.
- DRA may request additional information reasonably necessary to identify the record, requester, capacity or right concerned.

10.2 Fees

Prescribed fees may be payable, unless the requester is exempt under PAIA or requests access to a record containing their own personal information. The DRA Group will issue the prescribed notice of the outcome and any fees payable. Access fees may be charged for reproduction, search and preparation, and delivery. A deposit may be required where the search and preparation are expected to exceed six hours. The current fee schedule is reproduced in Annexure B and remains subject to amendment by law.

10.3 Decision Period

The DRA Group will decide a request as soon as reasonably possible and ordinarily within 30 days after receipt of a valid request. The period may be extended once for up to a further 30 days in the circumstances permitted by PAIA. The requester will be notified of any extension and the reasons for it.

10.4 Records that Cannot be Found or do not Exist

If reasonable steps have been taken to locate a requested record and it cannot be found or is believed not to exist, the DRA Group will notify the requester in the manner required by PAIA, including by affidavit or affirmation where applicable.

10.5 Grounds for Refusal

Access may be refused where a mandatory or discretionary ground in PAIA applies. These grounds include protection of:

- Privacy and personal information of third parties;
- Commercial, financial, scientific or technical information and trade secrets of the DRA Group or third parties;
- Confidential information supplied under an obligation of confidence;
- Safety of individuals, security of buildings, systems and property;
- Legally privileged records;
- Research information;
- Information whose disclosure would breach another law or court order; and
- Other interests protected under Chapter 4 of Part 3 of PAIA.

Where reasonably possible, the DRA Group will consider severing exempt material and granting access to the remainder. The public-interest override in section 70 of PAIA will be applied where its requirements are met.

11 REMEDIES AVAILABLE TO REQUESTERS

There is no internal appeal against a decision of the head of a private body. A requester or third party who is dissatisfied with a decision, a failure to decide, fees, an extension or another PAIA matter may:

- Lodge a complaint with the Regulator in the prescribed Form 5; or
- Apply to a court of competent jurisdiction for appropriate relief.

A complaint or court application must be brought within the time period prescribed by PAIA. The Regulator's current PAIA complaints email address is PAIAComplaints@inforegulator.org.za. The prescribed complaint form is available from the Regulator's website.

12 AVAILABILITY OF THE MANUAL

A copy of this Manual is available:

- On the DRA Group's website at www.draglobal.com and, where applicable, on www.minopex.com and www.senet.co.za;
- At the relevant head office identified in section 4 for public inspection during normal business hours;
- From the relevant DIO upon request, subject to payment of any prescribed reasonable reproduction fee; and
- To the Regulator upon request.

A fee for a copy of the Manual may be charged in accordance with the Regulations for each A4-size photocopy or other reproduction supplied.

13 UPDATING OF THE MANUAL

The IO will review this Manual regularly and update it when material changes occur, including changes to the entities covered, contact details, categories of records, processing activities, security measures, applicable legislation or PAIA requirements.

Annexure A: Form 2 – Request for Access to Record

The prescribed Form 2 issued under Regulation 7 must be used. The current official form is available from the Regulator's PAIA Forms webpage. A copy may also be requested from the relevant DIO. The following summary is provided for convenience and does not replace the prescribed form.

Form Section	Information required
A. Details of public/private body	Name and address of the body and the Information Officer
B. Particulars of requester	Full names or entity name, identity or registration number, postal and physical addresses, contact details, preferred communication method and proof of identity
C. Request on behalf of another person	Details of the person on whose behalf the request is made and proof of authority or capacity
D. Record requested	Detailed description, reference number if known, relevant dates, business area, and any further information enabling the record to be identified
E. Fees	Any claimed fee exemption and reasons
F. Form of access	Type of record, preferred copy or inspection format, delivery method and language
G. Right to be exercised or protected	The right concerned and an explanation of why the requested record is required for its exercise or protection
H. Notice of decision	Preferred manner of receiving the decision
Signature	Signature of the requester or authorised representative and date

Submission Details

Business Grouping	Email	Physical Delivery
DRA (Pty) Ltd	julie@apexpartners.com and EMEADPO@draglobal.com	Building 33, Woodlands Office Park, 20 Woodlands Drive, Sandton, 2080, South Africa
DRA and SENET	EMEADPO@draglobal.com	Building 33, Woodlands Office Park, 20 Woodlands Drive, Sandton, 2080, South Africa
Minopex	MinopexDPO@minopex.com	Building 31, Woodlands Office Park, 20 Woodlands Drive, Sandton, 2080, South Africa

Annexure B: Prescribed Fees for Requests to a Private Body

The following fees reflect the Regulator's published private-body fee structure as at the revision date. The legally prescribed fee in force at the time of the request will apply.

Description	Amount
Request fee payable by every requester, other than a personal requester or exempt requester	R140.00
Photocopy or printed black-and-white copy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4-size page or part thereof	R2.00 per page
Copy in computer-readable form on a flash drive supplied by the requester	R40.00
Copy on a CD supplied by the requester	R40.00
Copy on a CD supplied by DRA	R60.00
Transcription or copy of visual images	Actual outsourced service-provider quotation
Copy of an audio record on a flash drive supplied by the requester	R40.00
Copy of an audio record on a CD supplied by the requester	R40.00
Copy of an audio record on a CD supplied by DRA	R60.00
Search and preparation time, excluding the first hour	R145.00 per hour or part thereof
Maximum search and preparation fee	R435.00
Deposit where search and preparation exceed six hours	One-third of the applicable access fee
Postage, email or other electronic transfer	Actual expense, if any

All amounts are inclusive of VAT where applicable. Fee exemptions and limits are determined by PAIA and applicable notices and regulations.