Chris Baker & Associates Incorporated ("CBA")
Registration number: 1997/003001/21

Chris Baker & Associates

ATTORNEYS

PAIA MANUAL

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

DATE OF COMPILATION: 28/09/2021
DATE OF REVISION: 7/10/2026

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	**"CEO"**	Chief Executive Officer
1.2	**"DIO"**	Deputy Information Officer;
1.3	**"IO"**	Information Officer;
1.4	**"Minister"**	Minister of Justice and Correctional Services;
1.5	**"PAIA"**	Promotion of Access to Information Act No. 2 of 2000;
1.6	**"POPIA"**	Protection of Personal Information Act No.4 of 2013;
1.7	**"Regulator"**	Information Regulator; and
1.8	**"Republic"**	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CBA

3.1. **Information Officer**

Name:	Sara Amy Blumberg
Tel:	071 885 9863
Email:	sara@cbalaw.biz
Fax number:	N/A

3.2. **Deputy Information Officer**

Name:	Lauren Dulcie Oosthuizen
Tel:	079 524 8634
Email:	lauren@cbalaw.biz
Fax Number:	N/A

3.3 Access to information general contacts

Email:	sara@cbalaw.biz

3.4 **National or Head Office**

Postal Address:	N/A
Physical Address:	Building 4

Ground Floor
Waterfront Business Park
Pommern Street
Humerail
Gqeberha

Telephone: 041 373 3640

Email: sara@cbalaw.biz

Website: www.cbalaw.biz

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.2.1. the Information Officer of every public body, and

4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

4.3.3. the manner and form of a request for-

[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.*

4.3.3.1. access to a record of a public body contemplated in section 11[3]; and

4.3.3.2. access to a record of a private body contemplated in section 50[4];

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6. 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-

4.3.6.1. an internal appeal;

4.3.6.2. a complaint to the Regulator; and

4.3.6.3. 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;

4.3.7. the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

---

[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] 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

4.3.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92[11].

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

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (https://www.justice.gov.za/inforeg/).

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

4.6.1 English; and

4.6.2 Xhosa.

4.7 Information Regulator contact details:

Woodmead North Office Park
54 Maxwell Drive, Woodmead
Johannesburg
2191

Tel: 010 023 5200
Toll free: 0800 017 160
Email: enquiries@inforegulator.org.za

[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. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

5.1. Any person who wishes to request access to a record held by CBA must submit a request in the prescribed form and manner as required by PAIA and the PAIA Regulations. The request must be addressed to the Information Officer or Deputy Information Officer using the contact details set out in this Manual.

5.2. The requester must provide sufficient particulars to enable CBA to identify the record requested and the requester. Where the request is made on behalf of another person, proof of authority to act on behalf of that person must also be provided.

5.3. A requester must identify the right that they wish to exercise or protect and must provide an explanation of why the requested record is required for the exercise or protection of that right, as contemplated in section 50 of PAIA.

5.4. The prescribed request form is Form 02: Request for Access to Record [Regulation 7], or any updated form prescribed under the PAIA Regulations from time to time. The prescribed request form may be obtained from CBA on request, from the Information Regulator, or from the Information Regulator's official website. CBA may require payment of the prescribed request fee and any applicable access fee before processing or granting access to the requested record, where PAIA permits such fees. Any applicable fees will be calculated in accordance with PAIA, the PAIA Regulations and the prescribed fee structure applicable to private bodies.

5.5. Access to records is not automatic and remains subject to PAIA, including all applicable grounds of refusal, confidentiality obligations, legal privilege, and the requirements of POPIA. CBA will consider each request in accordance with PAIA and will notify the requester of its decision within the time periods prescribed by PAIA.

5.6. If a requester is dissatisfied with a decision made by CBA in relation to a PAIA request, including a refusal of access or the fees payable, the requester may lodge a complaint with the Information Regulator and/or approach a competent court for appropriate relief, as provided for in PAIA.

5.7. CBA may refuse access to a record where PAIA permits or requires refusal, including where disclosure would involve the unreasonable disclosure of personal information, legally privileged information, confidential commercial information, third-party information, information protected by law, or information that may compromise safety, security, confidentiality or statutory obligations.

6. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

In terms of Section 52 of the Promotion of Access to Information Act 2 of 2000 (PAIA), the following categories of records are automatically available from CBA without a person having to request access in terms of the Act:

Category	Types of Information	Available on Website	Available on Request *NOTE: Records listed as available on request remain subject to PAIA, including applicable grounds of refusal, confidentiality obligations, legal privilege and POPIA. Records containing personal information, confidential client information, privileged communications, internal business information or other protected content will only be considered for disclosure in accordance with PAIA.*
Company Information	Company registration documents		✓
	Company profile	✓	
	Office locations and contact details	✓	
	Business hours		✓
	Company organogram (general structure)		✓
	B-BBEE certificate	✓	
	Mission and vision statements	✓	
	Accreditation documentation	✓	✓
Public Affairs	Public product information	✓	
	Media releases	✓	

Category	Types of Information	Available on Website	Available on Request *NOTE: Records listed as available on request remain subject to PAIA, including applicable grounds of refusal, confidentiality obligations, legal privilege and POPIA. Records containing personal information, confidential client information, privileged communications, internal business information or other protected content will only be considered for disclosure in accordance with PAIA.*
Marketing	Market information	✓	
	Product brochures	✓	
	Client testimonials (with permission)	✓	
Leadership and Staff	Staff profiles	✓	✓
	Email addresses	✓	✓
	Contact information	✓	✓
Services Information	Description of services offered	✓	
	Standard fee structures (where applicable)	✓	✓
	Brochures and marketing material	✓	
	Newsletters and publications	✓	

Category	Types of Information	Available on Website	Available on Request *NOTE: Records listed as available on request remain subject to PAIA, including applicable grounds of refusal, confidentiality obligations, legal privilege and POPIA. Records containing personal information, confidential client information, privileged communications, internal business information or other protected content will only be considered for disclosure in accordance with PAIA.*
Governance Documents	PAIA Manual	✓	✓
	Privacy Policy	✓	✓
	Terms and Conditions of service		✓
	Complaints procedure	✓	✓
	General policies and procedures applicable to clients	✓	✓
	POPIA compliance documentation	✓	✓
	Ethics policy		✓
Labour Law Information	Published articles on labour law	✓	
	General information booklets on labour law	✓	

Category	Types of Information	Available on Website	Available on Request *NOTE: Records listed as available on request remain subject to PAIA, including applicable grounds of refusal, confidentiality obligations, legal privilege and POPIA. Records containing personal information, confidential client information, privileged communications, internal business information or other protected content will only be considered for disclosure in accordance with PAIA.*
	Labour law updates and newsletters	✓	
	Templates of standard forms (where publicly available)	✓	✓
	FAQs on labour legislation	✓	✓
	Statutory updates and summaries	✓	✓
Human Resources Information	Employment opportunities/vacancies		✓
	Standard HR templates	✓	✓
	HR best practice guidelines	✓	✓
Events and Training	Calendar of upcoming events/workshops	✓	✓
	Webinar recordings (where made public)	✓	✓

Category	Types of Information	Available on Website	Available on Request *NOTE: Records listed as available on request remain subject to PAIA, including applicable grounds of refusal, confidentiality obligations, legal privilege and POPIA. Records containing personal information, confidential client information, privileged communications, internal business information or other protected content will only be considered for disclosure in accordance with PAIA.*
News and Media	Press releases	✓	
	Media statements	✓	
	Articles and publications by company representatives	✓	
Regulatory Information	Industry codes of conduct	✓	✓
	Membership of professional bodies	✓	✓
	Certifications and accreditations	✓	✓
	Compliance certificates	✓	✓
	Professional registrations	✓	✓
Financial Information	Pricing guides and fee schedules	✓	✓

Category	Types of Information	Available on Website	Available on Request *NOTE: Records listed as available on request remain subject to PAIA, including applicable grounds of refusal, confidentiality obligations, legal privilege and POPIA. Records containing personal information, confidential client information, privileged communications, internal business information or other protected content will only be considered for disclosure in accordance with PAIA.*
	Banking details for payment purposes	✓	✓
Client Information	General procedural information for clients	✓	✓
	Client onboarding documentation (templates)	✓	✓
	Client feedback, comments and reviews	✓	✓
e-Library	Reference materials and resources	✓	✓
Social Media Platforms	Content posts and engagement	✓	✓
Website Information	Any other information contained on the website from time to time	✓	✓

7. DESCRIPTION OF THE RECORDS OF COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

The following records are available in accordance with legislation other than the Promotion of Access to Information Act (PAIA). These records may be accessed by the relevant persons or entities as specified in each applicable legislation:

Category	Types of Information
Basic Conditions of Employment Act	• Employment contracts • Remuneration records • Leave records • Working hours
Labour Relations Act	•Employee grievances
Occupational Health and Safety Act	• Health and safety committee records • Incident reports • Health and safety policies
Skills Development Act	• Workplace skills plan • Annual training reports • Skills development levies
Unemployment Insurance Act	• Employee UIF registration • UIF payment records • UIF returns
Compensation for Occupational Injuries and Diseases Act	• Work-related injury reports • COIDA registration • Accident records and investigations
Income Tax Act	• PAYE records • Employee tax information • Tax clearance certificates
Value Added Tax Act	• VAT registration • VAT returns • VAT payment records
Companies Act	• Memorandum of Incorporation • Share register • Directors' information • Annual returns • Company secretarial records
Broad-Based Black Economic Empowerment Act	• B-BBEE certificate • B-BBEE verification information • Ownership information • Skills development records
National Credit Act	• Credit agreements (if applicable) • Credit assessment records

Category	Types of Information
Consumer Protection Act	• Services and products information • Customer agreements • Services and products return and refund policies
Electronic Communications and Transactions Act	• Electronic communications policies • Website terms and conditions • Privacy policy
Protection of Personal Information Act	• POPIA compliance framework • Processing records • Data subject access requests • Consent records • Privacy notices
Financial Intelligence Centre Act	• Client verification and due diligence records • Records required to be kept under the Financial Intelligence Centre Act, subject to applicable confidentiality and non-disclosure obligations
Promotion of Access to Information Act	• PAIA manual • PAIA request records

Additional legislation that may apply to CBA includes, where applicable, the Legal Practice Act 28 of 2014, the rules of the Legal Practice Council, the Tax Administration Act 28 of 2011, the Electronic Communications and Transactions Act 25 of 2002, POPIA, and any other legislation applicable to the professional, employment, tax, financial, trust accounting and compliance records held by CBA.

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE COMPANY

The following table outlines the subjects on which our company holds records and the categories of records held on each subject:

Subject	Categories of Records
Strategic Documents, Plans, Proposals	• Annual Reports • Strategic Plan • Business plans • Corporate social responsibility initiatives
Finance and Accounting	• Annual financial statements • Management accounts • Banking records • Supplier invoices and statements

Subject	Categories of Records
	• Tax returns and assessments • Asset register • Debtors and creditors information • Insurance policies and claims • Audit reports • Financial policies and procedures • Investment records
Payroll	• Employee IDs • Payroll reports • Payslips • Salary information • Statutory returns • Tax certificates • Benefit deductions • Leave pay records
Human Resources	• HR policies and procedures • Employee personal information • Employment contracts • Personnel files • Leave records • Remuneration and benefits information • Training records • Disciplinary records • BBBEE records • Workplace skills plans • Occupational health and safety records • Recruitment and selection records
Sales and Marketing	• Client information for invoicing purposes • Marketing strategies and plans • Marketing materials and brochures • Advertising records • Media releases • Corporate communications • Market research • Brand management records • Social media content and reports • Event management records • Customer relationship management records
Registrations and Accreditations	• SSETA (Services Sector Education and Training Authority) documentation • SABPP (South African Board for People Practices) registration

Subject	Categories of Records
	• B-BBEE documents and certificates • Professional body memberships • Accreditation certificates • Quality assurance documentation • Industry-specific certifications • Continuing professional development records
Corporate Governance	• Memorandum of Incorporation • Company rules and by-laws • Company policies and procedures • Directors' personal information
Operations and Administration	• Operational policies and procedures • Quality management records • Service delivery records • Project documentation • Business processes • Standard operating procedures • Supply chain documentation • Administrative forms and templates • Office management records
Information Technology	• System backups • Security systems and records • IT policies and procedures • IT asset register • System documentation • User manuals and training materials • Software licenses • Network diagrams • Data backup and disaster recovery records • Website information
Legal and Compliance	• Contracts and agreements • Litigation records • Legal opinions • Regulatory submissions and correspondence • Compliance reports • Statutory records • Intellectual property records • Tender documentation • Code of conduct
Client Services	• Client information and records • Client contracts and agreements

Subject	Categories of Records
	• Client reports and deliverables • Client feedback and satisfaction surveys • Client billing and payment records • Client consultation records
Labour Law and HR Consulting	• Case law compilations • Labour law advisory records • HR consulting methodologies • HR audit reports • Employment relations records • Internal dispute resolution procedures • Training materials and methodologies • Client consultation notes • Best practice documentation
Business Consulting	• Business consulting methodologies • Strategic planning documentation • Business analysis reports • Process improvement records • Change management documentation • Business model designs • Benchmarking studies • Industry best practices • Consulting frameworks and tools • Consultation records
Research and Development	• Research records and data • Development project documentation • Product/service development records • Feasibility studies • Technical specifications • Testing and evaluation records • Industry analysis and reports • Trend analysis • Market opportunity assessments

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

CBA processes PI for various purposes including for –

- Engaging in various forms of direct marketing;

- Facilitating transactions with data subjects;
- Collecting data for statistical purposes to improve its services;
- Fulfilling its contractual obligations to its clients and client contacts;
- Complying with the provisions of statute and regulations;
- Attending to the legitimate interests of data subjects;
- Identifying prospects for enhanced service delivery and business sustainability
- Tracking data subject activity on the website and its links as well as their transactions with CBA;
- Providing data subject information to CBA's business partners, including Global Business Solutions, Kirchmanns Incorporated, Circle and Square, Joint Prosperity, Inscape Properties, and/ or Operators (as contracted) in order for CBA's partners to use the information to market their services to data subjects who are current clients and/ or who have consented as envisaged in the POPI Act. These partners who are recipients of PI are business organizations who are permitted to use the information only for lawful sales, marketing, and engagement;
- Any direct marketing or sharing of personal information with business partners, operators or third parties will only take place where CBA has a lawful basis to do so, including consent, an existing client relationship, contractual necessity, legal obligation, legitimate interest, or another ground permitted by POPIA.
- Confirm and verify data subject identity or to verify that they are authorised users for security purposes;
- Conduct market or customer satisfaction research;
- Audit and record keeping purposes;
- In connection with legal proceedings.

9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

In accordance with the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA), CBA processes personal information relating to the following categories of data subjects:

Categories of Data Subjects	Personal Information Processed
Clients - Current	• Full names and contact details • Identity/registration numbers • Financial information (banking details, payment history) • Tax information and VAT numbers • Service/product preferences and history • Correspondence records • Contract details and service level agreements • Company registration information • Meeting and consultation notes

Categories of Data Subjects	Personal Information Processed
	• Client feedback and satisfaction information
Clients - Prospective	• Full names and contact details • Business information and industry • Service requirements and preferences • Meeting and consultation notes • Proposal details • Marketing communication consent
Employees - Current	• Full names and contact details • Identity numbers and demographic information • Educational qualifications and professional certifications • Employment history and references • Employment contracts and job descriptions • Salary and benefits information • Banking details • Tax information • Disciplinary records • Leave records • Training and development records • Medical information (including disability information) • Biometric information (if applicable) • Next of kin and emergency contact details
Employees - Former	• Full names and contact details • Employment history and positions held • Remuneration history • Reason for termination of employment • Retirement or resignation information
Job Applicants	• Full names and contact details • Identity numbers • Educational qualifications and certifications • Employment history and references • Curriculum vitae and application information • Background check information • Recruitment documentation
Suppliers and Service Providers	• Company/entity name and registration details • Contact details of representatives • B-BBEE status and certificates

Categories of Data Subjects	Personal Information Processed
	• Banking details • Tax information and VAT numbers • Contractual agreements and terms • Compliance documentation • Correspondence records
Directors and Shareholders	• Full names and contact details • Identity numbers/passport details • Shareholding information • Directorship details • Banking details for dividend payments • Tax information • Meeting attendance records • Voting records
Business Partners	• Full names and contact details • Identity/registration numbers • Partnership agreements
Visitors to Premises	• Full names • Identity or passport numbers • Contact details • Vehicle registration (if applicable) • Surveillance records (CCTV footage) • Time and date of visits • Purpose of visit
Website Users and Online Visitors	• IP addresses • Browser type and version • Operating system information • Pages visited and navigation patterns • Time spent on website • Referring websites • Contact information submitted through web forms • Subscription preferences
Consultants and Independent Contractors	• Full names and contact details • Identity/registration numbers • Professional qualifications and certifications • Service agreements and scope of work • Performance evaluations

Categories of Data Subjects	Personal Information Processed
	• Banking details • Tax information • Correspondence records

9.3 The recipients or categories of recipients to whom the personal information may be supplied

In accordance with Section 51(1)(c)(ii) of the Promotion of Access to Information Act and the Protection of Personal Information Act, CBA may supply personal information to the following recipients or categories of recipients:

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be supplied
Identity number and names	• South African Police Services (for criminal checks) • Department of Home Affairs (for verification) • Background screening service providers • South African Revenue Service (SARS) • Financial institutions • Regulatory bodies (as required by law)
Credit and payment history	• Credit Bureaus • Financial institutions • Debt collection agencies • Courts (as required by legal proceedings)
Contact information	• Service providers (IT, payroll, marketing, etc.) • Regulatory bodies (as required by law) • Government departments • Insurance providers • Third-party consultants (when authorized)
Employment history and records	• Department of Labour • Unemployment Insurance Fund (UIF) • Compensation Fund • Recruitment agencies (with consent) • Verification agencies • Future employers (with consent for references)
Banking details	• Banking institutions

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be supplied
	• Payroll service providers • South African Revenue Service (SARS) • Auditors • Legal representatives (when authorized)
Healthcare information	• Medical aid schemes • Insurance providers • Occupational health practitioners • Wellness program providers • Employee benefits administrators
B-BBEE information	• B-BBEE verification agencies • Department of Trade, Industry and Competition • Clients (for tender and procurement purposes) • Sector Education and Training Authorities (SETAs)
Tax information	• South African Revenue Service (SARS) • Tax consultants and auditors • Financial institutions • Payroll administrators
Corporate information	• Companies and Intellectual Property Commission (CIPC) • Industry regulatory bodies • Government departments • Business partners (as authorized) • Service providers (legal, accounting, etc.)
Legal proceedings information	• Courts and tribunals • Legal representatives • Commission for Conciliation, Mediation and Arbitration (CCMA) • Regulatory authorities • Opposing parties in litigation (through legal process)
Website usage data	• IT service providers • Website analytics providers • Marketing service providers • Cybersecurity consultants

9.4 Planned transborder flows of personal information

9.4.1 There are no envisaged cross-border flows of personal information outside of cloud server storage in Europe. Any cross-border transfer of personal information will be undertaken in accordance with POPIA, including ensuring that the recipient is subject to appropriate data protection safeguards or that another lawful basis for the transfer exists.

9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

9.5.1. CBA is legally obliged to provide adequate systems, technical and operational protection for the personal information that it holds and to prevent unauthorised access to, as well as prohibited use of, personal information. CBA will therefore review its security controls and related processes on a regular basis to ensure that the personal information of data subjects remains secure.

9.5.2. CBA has conducted an impact assessment across all of its functions and used the findings thereof to manage risk optimally as well as to provide iterative improvements on an ongoing basis.

9.5.3. Our company utilizes the Microsoft 365 suite of applications, which provides enterprise-grade security features including data encryption at rest and in transit, multi-factor authentication, and advanced threat protection. Access to information is strictly controlled on a need-to-know basis through role-based access controls and regular user access reviews. All systems are protected by industry-standard anti-virus and anti-malware solutions that are regularly updated to address emerging threats.

9.5.4. CBA's policies and procedures cover the following aspects:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

9.5.5. We maintain comprehensive data backup procedures to ensure business continuity and implement regular security patches and updates across all systems. Our staff receives

ongoing information security awareness training to minimize human error risks. Physical security measures are in place at our premises to protect information assets, including access control systems and CCTV surveillance where appropriate.

9.5.6. All sensitive data transmissions occur over encrypted connections, and we implement secure configuration standards across our IT infrastructure. Remote access to company systems is secured through virtual private networks (VPNs) with strong authentication requirements. We conduct periodic security assessments and vulnerability scans to identify and address potential security weaknesses proactively.

9.5.7. CBA also ensures that it contracts with Operators as required by POPIA and it requires appropriate security, privacy and confidentiality obligations of these operators in order to ensure that personal information is kept secure. The same protocols apply to any party to whom CBA may pass personal information on to for the purposes mentioned herein.

9.5.8. Our information security policies and procedures are regularly reviewed and updated to address evolving threats and comply with relevant legislation, including the Protection of Personal Information Act (POPIA) and other applicable regulatory requirements.

9.5.9. In the event of a security breach, we have documented incident response procedures to ensure timely containment, investigation, and notification to affected parties and relevant authorities as required by law.

9.5.10. Note: While we implement reasonable security measures, no security system can prevent all potential security threats. We continuously monitor our systems and adjust our security measures as new threats and solutions emerge.

10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available-

10.1.1 on the CBA's website at www.cbalaw.biz;

10.1.2 head office of the company for public inspection during normal business hours;

10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.4 to the Information Regulator upon request.

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

11. UPDATING OF THE MANUAL

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

Issued by



Sara Amy Blumberg

Information Officer