



## PAIA MANUAL

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

Document Title	Promotion of Access to Information (PAIA) Manual	Version	2022/01
Author	Bruce van Niekerk	Date issued	
Reviewed & Approved by	Super Group Executive Committee	Date reviewed	
Disclosure	For public use		

## 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 (as amended);
- 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 has been compiled in compliance with the **PAIA** and **POPIA** to assist persons seeking information (herein a “Requester”) that is in the possession of Super Group Limited.

This manual will specifically assist a Requester to –

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

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- 2.2 have a sufficient understanding of how to make a request for access to a record of Super Group Limited, 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 Super Group Limited 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 Information Regulator of South Africa and how to obtain access to it;
- 2.6 know if Super Group 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 Super Group Limited 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 Super Group Limited has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

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### 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF SUPER GROUP LIMITED

#### 3.1. Information Officer

Name: Peter Mountford  
Group CEO  
c/o Company Secretary  
John Mackay  
Tel: 011 523 4663  
Email: john.mackay@supergrp.com

#### 3.2. Deputy Information Officer

Name: Bruce van Niekerk  
Tel: 011 523 4488  
Email: bruce.vanniekerk@sgits.co.za

#### 3.3 Access to information requests:

Email: sgpopia@supergrp.com

#### 3.4 Super Group Limited Head Office

Postal Address: Private Bag X9973  
Sandton  
2146  
Physical Address: 27 Impala Road  
Chislehurst  
Sandton  
2128  
Telephone: 011 523 4000  
FAX 011 784 9774  
Website: [www.supergroup.co.za](http://www.supergroup.co.za)

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#### 4. CATEGORISATION OF RECORDS AND INFORMATION

Classification Number	Access	Classification
1	May be disclosed	Public access document
2	May not be disclosed	Request for, or after commencement of, criminal or civil proceedings [s7]
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information that belongs to the requester of that information [s61]
5	May not be disclosed	Unreasonable disclosure of personal information of natural person [s63(1)]
6	May not be disclosed	Likely to harm the commercial or financial interests of third party [s64(a)(b)]
7	May not be disclosed	Likely to harm a third party in contract or other negotiations [s64(c)]
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement [s65]
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property [s66]
10	May not be disclosed	Legally privileged document [s67]
11	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks [s64(3)]
12	May not be disclosed	Commercial information of private body [s68]
13	May not be disclosed	Likely to prejudice research and development information of Super Group Limited or a third party [s69]
14	May not be refused	Disclosure in public interest [s70]

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## 5. AVAILABILITY OF RECORDS AND INFORMATION

Type of Records	Subject	Classification Number
<b>Investor Relations</b>	Current Product Information	3
	Public Corporate Records	1
	Media Releases	1
<b>Group Health and Safety</b>	Group OHS policy	1
	Health and safety records	4,10
	Environmental Records	11, 14
<b>Human Resources Division</b>	Employee Records	4, 5, 8, 9
	Employment Contracts	4, 5, 8
	Personnel Guidelines, Policies and Procedures	10, 13
	Employee Medical Records	4, 5, 8, 9
<b>Group Treasury and Audit</b>	Financial Statements	1
	Financial and Tax Records (Company and Employees)	1, 8,10
	Asset Register	1
<b>Group Legal and Company Secretarial Divisions</b>	General Contract Documentation	6, 10, 13
	Company Guidelines, Policies and Procedures	10, 13
	Trade Marks	3
	Statutory Records	1

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<b>Group Marketing</b>	Market Information	13
	Product Brochures	1
	Marketing and Product Strategies	13
	Product Sales Records	13
	Customer Information and Customer Database	5, 6, 9

## 6. PROCESSING OF PERSONAL INFORMATION

### 6.1. Purpose of Processing Personal Information

Super Group will process Personal Information for the following purposes in compliance with applicable laws:

- a) to perform in terms of an agreement or intended agreement to which Super Group is a party;
- b) for any legitimate purposes related to the relationship between Super Group and its employees;
- c) to process credit applications (where relevant);
- d) to manage relationships between Super Group and any related third parties;
- e) to contact Data Subjects for marketing purposes, subject to the provisions of the Act;
- f) for internal business purposes, which includes:
  - i. administrative and operational tasks;
  - ii. monitoring our business, carrying out market and statistical research, and for business development;
  - iii. financial management, business audits and analyses, and fraud prevention; and
  - iv. compliance with legal requirements;
- g) to comply with reporting and other legal obligations in terms of contracts or the law;
- h) any other purpose if the law allows or requires it.

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**6.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto**

Categories of Data Subjects	Personal Information that may be processed
Shareholders	name, address, registration numbers or identity numbers, employment status and bank details
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race, any relevant health and medical information, disciplinary records,

**6.3. The recipients or categories of recipients to whom the personal information may be supplied**

- a. Super Group will not use or disclose Personal Information to any third party for any purpose other than the purpose for which the information was collected, without obtaining the necessary consent to do so or to the extent that legislation permits or requires.
- b. Super Group will disclose Personal Information to regulatory authorities, accountants, auditors, lawyers or professional advisors if contractually required to or legal obligated to.
- c. Information may also be shared with third party service providers whose products or services are related to or connected with the products or services supplied to you by Super Group.
- d. Super Group may transfer information to third parties if it sells any portion of its business or assets.

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e. Information may be shared with Super Group's approved service providers or subcontractors when and if required to in order to fulfil its obligations to any Data Subject, however information will only be transferred to these third parties when and if all the required and relevant confidentiality and data security undertakings and legal requirements have been contractually accepted and agreed to in writing and in the event of a transfer of Personal Information to any third party, details of the transfer will only be retained for as long as is required to fulfil contractual obligations and / as allowed or required by law.

**6.4. Planned trans-border flows of personal information**

Super Group may use cloud storage services, which could result in Data Subjects' information being transferred cross-border. Super Group will only transfer Personal Information to third parties in countries with adequate data protection laws or do so in terms of a written agreement with the recipient which imposes data protection requirements on that party as required by POPIA.

**6.5. Information Security Measures**

Super Group secures its data by maintaining reasonable measures to protect personal information from loss, misuse and unauthorised access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete and reliable for its intended use.

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## 7. AVAILABILITY OF THE MANUAL

7.1. A copy of the Manual is available-

7.1.1. on [www.supergroup.co.za](http://www.supergroup.co.za)

7.1.2. Head office, via the Company Secretary, at:

27 Impala Road, Chislehurst  
Johannesburg  
South Africa

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

7.1.4. to the Information Regulator upon request.

7.2. 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.

## 8. UPDATING OF THE MANUAL

The head of Super Group Limited will on a regular basis update this manual.

### **Issued by**

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Peter Mountford  
**Group CEO**  
Super Group Limited

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