



Exceed the Bar (Pty) Ltd

Reg: 2022/676207/07

PAIA & POPIA MANUAL

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

and

in terms of section 12 of the Schedule of the Protection of Personal Information Act 4 of 2013 (POPIA), amending section 51 of PAIA, and section 4(1)(c) of the Regulations issued in terms of the POPIA (2018)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	BCP	Business Continuity Plan
1.2	Body	the (this) private body, Exceed the Bar (Pty) Ltd;
1.3	DIO	Deputy Information Officer;
1.4	EEA	European Economic Area
1.5	EMEA	Europe, Middle East, Africa
1.6	IO	Information Officer;
1.7	IRP	Incident Response Plan;
1.8	IT	Information Technology
1.9	LAN	Local Area Network
1.10	MD	Managing Director;
1.11	Minister	Minister of Justice and Correctional Services;
1.12	PAIA	Promotion of Access to Information Act 2 of 2000 (as amended);
1.13	POPIA	Protection of Personal Information Act 4 of 2013;
1.14	Regulator	Information Regulator; and
1.15	Republic	Republic of South Africa
1.16	VPN	Virtual Proxy Network

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 2.1 check the categories of records held by this 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 this body, by providing a description of the subjects on which this body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of this 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 of this body 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 this 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 this 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 this 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 THIS BODY

3.1. Information Officer

Name: Phoenix Bakker
Tel: 012-343-0143
Email: phoenix@exceedthebar.com
Fax: 086-483-7810

3.2. Deputy Information Officer

Name: Tanja Nicholls
Tel: 012-343-0143
Email: tanja@exceedthebar.com
Fax: 086-483-7810

3.3 Access to Information (General Contacts)

Email: admin@exceedthebar.com

3.4 National or Head Office

Postal/Physical Address: 508 Berea Street
Muckleneuk
Pretoria, Gauteng, 0002
Telephone: 012-343-0143
Email: admin@exceedthebar.com
Website: www.exceedthebar.com

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 from the Regulator.
- 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, the 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 PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form of a request for:
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; 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.*

- 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 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 / 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 to 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 14⁵ and 51⁶ 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 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

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

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-

4.4. Members of the public can inspect / 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; or

4.5.2. from the Regulators' website at:

<https://info regulator.org.za/information-regulator-paia-manuals/>

4.6 A copy of the Guide is also available in the following three official languages, for public inspection during normal office hours at this body's registered offices:

4.6.1 English

4.6.2 Afrikaans

4.6.3 SeSotho

5. AVAILABLE CATEGORIES OF RECORDS WITHOUT NEED TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Legal Documents	Information Regulator PAIA Guide Exceed the Bar PAIA and POPIA Manual	X	X
Forms (free of charge)	Form 1 - Objection to Processing of Personal Information (2018) Form 1 Reg 3 - Request for a Copy of the PAIA Guide Form 2 Reg 7 - Request for Access to Record Form 2 - Request to Correct / Delete Personal Information or to Destroy or Delete a Personal Record Form 5 Reg 10-1 - Info Regulator Complaint Form	X	X

(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."

Category of records	Types of the Record	Available on Website	Available upon request
General Information (free of charge)	General information brochures (free of charge)	X	X
Website Information (free of charge)	About Us Our Vision Our Mission Solutions and Services Legal Advisory Cybersecurity Law Student Support & Tutoring Management Support Leadership & Team Effectiveness Assessment Solutions Testimonials Contact Us Resources Toolkits (How to) Brochures Programs & Workshops (List of future workshops)	X	X

6. DESCRIPTION OF RECORDS AVAILABLE IN TERMS OF LEGISLATION

Category of Records	Applicable Legislation
Company Records Certificate of Registration Memorandum of Incorporation Company Share Register Register of Directors Minutes and Resolutions	Companies Act 71 of 2008
Company Records BEE Certificate	Broad Based Black Economic Empowerment Act 53 of 2003
Company Records Register of Employee Earnings	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Company Records Employment Equity Plan	Employment Equity Act 55 of 1998
Company Records Health Practitioner (Psychologist) Registration Record Psychologist Training Certificates	Health Professions Act 56 of 1974
Company Records Lease Agreements Hire Purchase Agreements Credit Agreements	Deeds Registry Act 47 of 1937

Category of Records	Applicable Legislation
Employee Records Employee Files Employment Contracts Discipline Records Job Descriptions	Basic Conditions of Employment Act 75 of 1997 Unemployment Insurance Fund 63 of 2001
SARS Records IRP5, IRP6 VAT201 EMP201, EMP501, ITR12	Tax Administration Act 28 of 2011 Value Added Tax Act 89 of 1991 Income Tax Act 58 of 1962
PAIA Guide	PAIA 2 of 2000
PAIA & POPIA Manual	PAIA 2 of 2000 POPIA 4 of 2013 POPIA Regulations 2018

7. DESCRIPTION OF SUBJECTS AND CATEGORIES OF RECORDS HELD

Subjects on which the body holds records	Categories of records
Corporate Governance	Company Rules, Policies, Procedures, Risk Management Framework, Compliance Framework and Audit, Business Continuity Plan, Information and Cybersecurity Plan, Personal Information Impact Assessment
Human Resources	HR policies and procedures, Employee records (employment contracts), Education and Training Records, Travel records, CV's, Medical Aid Records, Leave Records, Discipline Records
Sales and Marketing	Client Details, Advertising and Marketing Material
Finance	Banking Records, SARS Records (including PAYE, UIF, VAT, Returns), Compensation Fund Records, Accounting and Bookkeeping Records, Annual Financial Statements, Expense Records, Income Records, Asset Register and Records, Account Records, Debtors and Creditors Statements and Invoices
Services	Service Level Agreements (Suppliers and Clients), Non-Disclosure Agreements, Terms and Conditions (Suppliers), Licence Agreements (Suppliers), Contracts (Clients), Case Files (Consulting and Advisory), Client or Candidate Records, Consent Forms, Candidate Assessment Reports, Lecture Notes
Compliance	Contracts, FICA Documents, Insurance Records, Medical Aid Scheme Records, Professional Licenses, Archive records, IT Device and System Manuals, Software Licenses, Due Diligence Records.
New Business and PR	Individualized Sales and Presentation Brochures

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

- 8.1.1. Exceed the Bar (Pty) Ltd conduct and compile assessment and advisory reports for client companies and individuals.
- 8.1.2. Our business psychology component conduct (psychometric) assessments, case studies and anonymous workplace-based surveys that require consenting data subjects to share workplace performance information with us.
- 8.1.3. Our legal advisory component requires consenting data subjects to share details of their legal problems in order to provide legal opinions containing recommendations and options; or in order to conduct legal procedures such as lodging applications for licensing, registrations, claims, or pre-referral administrative processes to attorneys and advocates.
 - 8.1.3.1. Based on the circumstances, and with the clients' consent, we will refer cases to suitably qualified and duly registered legal practitioners for further processing.
 - 8.1.3.2. We provide general legal advice across the spectrum of legal fields, and focus on cyberlaw, advising on eCommerce, data privacy, cybersecurity and cybercrime aspects.
 - 8.1.3.3. Our advisory nature necessitates the invocation of legal privilege and strict professional legal ethics.
- 8.1.4. Our legal advisory component will also canvass, select, recommend, recruit and place legal professionals in the employ of various law firms and companies.
 - 8.1.4.1. To this end there is a need to screen candidates, including verification of educational qualifications, criminal records and employment histories of recruitment candidates.
 - 8.1.4.2. In some instances we may be required to assess such candidates.
- 8.1.5. In all above instances, personal information may be collected and processed.

8.1.6. The gathering and processing of the stated categories, subjects and types of personal information in this Manual is done in order to provide the services we offer to our clients.

8.1.7. We also conduct workshops and training (coaching, mentoring, and lecturing) on topics relevant to our service offering.

8.2 Description of Data Subject Categories and Information Relating Thereto

Categories of Data Subjects*	Personal Information that may be processed
Customers / Clients	Name, email, address, telephone numbers, registration numbers or identity numbers, employment status and bank details. Advisory clients may provide a range of highly confidential personal information as required on a case-by-case basis. We strive to obtain factual data on matters, but extends also to opinions, views and perceptions. Such information will only be shared with a legal practitioner if the client consents to a referral.
Candidates / Survey Participants or Respondents	Name, email, telephone numbers, employment status (capacity) [only where a psychometric assessment is conducted]. Anonymity applies for general surveys. Where personal information is required, the applicable fields will not be marked as compulsory. Completion of such fields is deemed data subject consent. In general, opinions, personal views and perceptions.
Students, webinar attendees, workshop delegates, coaches, mentees	Name, email, telephone number. If a recording is made, we may in certain circumstances ask the data subject to introduce themselves and do not exercise control over what personal information they choose to share. A disclaimer will be made available in this regard.
Candidates / Recruits / Applicants	CV (which usually contains personal information disclosed in good faith by the applicant, assessment information (if undergoing any battery of tests), criminal history, education history, employment history).
Service Providers	Name, email, address, telephone numbers, registration number, vat numbers, trade secrets and bank details.
Employees	Name, email, address, telephone numbers, qualifications, unique identifiers (ID/passport numbers, social media handles), bank details, gender and race.

*The personal information of the above listed categories data subjects will strictly and only be processed if consent is obtained from the data subject.

8.3 Categories of Recipients to whom Personal Information may be Supplied

Category of personal information*	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services (may include third party service providers, such as Kroll and Huru)

Category of personal information*	Recipients or Categories of Recipients to whom the personal information may be supplied
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Names, email, telephone number, qualification, opinions, views, perceptions (personal and by others) for Psychometric Assessments	Third Parties (assessment service providers)
Relevant case files and briefs containing but not limited to criminal behaviour, commission of criminal offence/s, proceedings and disposal of proceedings	Appointed Legal Practitioners (Attorneys and Advocates)

*The above listed categories of personal information will strictly and only be shared with the stated recipient if consent is obtained from the data subject.

8.4 Planned Transborder Flows of Personal Information

8.4.1. Transborder flows of personal information, in particular, are incidental to the process in which the body will process information.

8.4.2. Exceed the Bar (Pty) Ltd purchase internationally accredited assessments from service providers who provide links (which Exceed the Bar (Pty) Ltd forward to relevant candidates undergoing an assessment). The candidate is then able to login to their personal assessment as provided on the third party's online assessment platform, which then hosts and processes their assessment data in accordance with the trade marked software program of the service provider, the end-result of which is a statistically modelled data report accessible only by Exceed the Bar (Pty) Ltd.

8.4.3. Exceed the Bar (Pty) Ltd is then notified the assessment has been completed and statistical assessment data made available. The body then downloads the assessment data from the service provider and remodels it in line with our own report criteria, which is subjected by our psychologist to evaluation, interpretation and feedback (strictly to the candidate).

8.4.4. Third party suppliers receive the consenting candidates' data that was voluntarily uploaded or disclosed during the online assessment, the data of which is hosted on foreign servers and cloud service providers.

8.4.5. The body conducts a due diligence on each service provider before signing any contract, service level agreement, or license agreement. The purpose of such due diligence is to establish that the Third Party Service Provider / Operator’s data handling accords with section 72 of POPIA.

8.4.6. The same is done in terms of any applications or specific software Exceed the Bar (Pty) Ltd use for assessment purposes.

8.4.7. Depending on the service provider (who acts as an operator on behalf of the responsible party the data will be transferred as follows:

Service Provider (Third Party Operator)*	Storage / Cloud Country
Cognadev	Ireland and Netherlands (MS Azure Public Cloud)
Herrmann	Ireland and USA
JvR	GDPR jurisdictions, USA and Australia
Korn Ferry	USA (with California and Mexico opt-outs) Non-EEA with adequate measures, vetted in terms of https://bit.ly/3ge4jIH
Lumina Learning	Amazon Web Services (Luxembourg) Microsoft Ireland Operations Ltd Steamhaus Ltd (UK) Alchemer LLC (USA)
Propel	Outside EEA with adequate measures
Thomas Int (SA)	UK, EEA and non-EEA with adequate measures MS Azure Public Cloud (Netherlands)
TTS	Outside EEA with adequate measures Switzerland USA
Survey Monkey	Ireland and USA

* The categories of personal information that could be subjected to transborder transfers are enumerated in 8.2 above.

8.4.8. This list is not exhaustive, and is subject to further due diligence.

8.4.9. Where the body learns that personal information will be transferred to third party processors, storage or cloud operators beyond the jurisdictions mentioned in the above, Exceed the Bar (Ltd) will ensure that our Operators will provide sufficient guarantees in terms of the technical and organisational security measures required to safeguard personal data and information.

8.4.10. Exceed the Bar (Pty) Ltd will also take reasonable steps in good faith to assess third party compliance with such adequate measures to ensure personal information is adequately protected in accordance with the PAIA and POPIA laws of the Republic.

8.4.11. Our legal component do not store or make use of service providers outside the Republic, as yet. Our current service provider hosts local server and cloud capacity from a dedicated N+1 Data Centre with redundant cooling, fire suppression, UPS and generator backup facility, and utilises a carrier-grade network with 24/7 incident monitoring. The principles, rules and procedures of section 72 of POPIA will be applied when transborder data transfers are necessitated.

8.4.12. As far as this body makes use of Caselines, it is noted Caselines falls within the IT and transborder information domains of Thomson Reuters, whose servers and cloud providers are located in Canada, but not restricted there. As soon as Caselines disclose the nature of and how any transborder flows of personal information uploaded to the judicial system will be handled, Exceed the Bar (Pty) Ltd will be able to provide clarity in this regard.

8.4.12. Webinars are generally conducted via Zoom or Microsoft Teams.

8.4.12.1. Zoom cloud servers are currently hosted by data centres in Amsterdam, Frankfurt, Hong Kong, Melbourne, New York, Silicon Valley, Sydney, Tokyo and Toronto, and are further hosted on MS Azure Public Cloud, Amazon Web Service (AWS) and Oracle Cloud infrastructure.

8.4.12.2. MS Teams servers are currently based in Australia, Brazil, Canada, France, Germany, India, Japan, Norway, the United Arab Emirates, United Kingdom, South Korea, South Africa, and Switzerland (which includes Liechtenstein) and the USA. South Africa's data is stored in the EMEA region.

8.5 General Information Security Measures

Exceed the Bar (Pty) Ltd is a responsible party in terms of processing our data subjects' personal information. To safeguard information and personal information, adequate cybersecurity measures have been identified and adopted. These include:

- 8.5.1. Anti-virus and anti-malware solutions with auto-scanning of all email attachments and detachable devices when connected to the network.
- 8.5.2. Appropriately and adequately configured internet firewalls.
- 8.5.3. Anonymization, aggregation, and de-identification of personal information gathered during surveys.
- 8.5.4. Aggregated, anonymized and de-identified information is not considered personal information for purposes of this Manual and our service offerings.
- 8.5.5. Implementation of endpoint protection on all devices, including flash drives, external hard drives, and tablets to prevent spread of malicious code, and with plug-in and pop-up blockers installed.
- 8.5.6. Updating all system software, including 8.5.1 above.
- 8.5.7. Secure web connections, with regular Wi-Fi, LAN and router inspections.
- 8.5.8. Secure web browsing and email settings (use of VPN and private browsing).
- 8.5.9. Data encryption with remote erasure of lost or compromised devices.
- 8.5.10. Due diligence on cloud provider security and third-party suppliers
- 8.5.11. Strict access control management: to physical premises, and data systems.
- 8.5.12. Segmentation framework for network traffic.
- 8.5.13. Regular audits of log files for irregularities and abnormalities.
- 8.5.14. Whitelist and blacklist applications.
- 8.5.15. Secure mobile devices.
- 8.5.16. Secure all detachable storage devices (as retain data).

8.5.17. Sound password management with multi-factor authentication.

8.5.18. Cyber Security Risk Assessment with quarterly system testing.

8.5.19. Cyber Security Policy, with monthly cybersecurity awareness training for all employees.

8.5.20. Incident Response and Business Continuity Plans (IRP and BCP).

8.5.21. Social media workplace policy.

8.5.22. Auto-archiving with randomised database backups.

8.5.23. Sandboxing critical data.

8.5.24. Non-Disclosure Agreements.

All data security measures are regularly revised and maintained in line with IT industry and cybersecurity best practices.

9. DISCLAIMERS

9.1. Transmission of information and personal information over the internet can never be guaranteed as 100% secure.

9.2. This body commits to do our best to ensure the protection and maintain the integrity of the data subjects' personal information, but cannot guarantee the security of data being transmitted to or through the services of our Operators. The data subject does so with informed consent, at own risk.

9.3. Once this body receives the data subjects' information, it will use strict procedures and security policies and protocols to prevent unauthorised access to the best of its ability.

9.4. This body cannot and does not assume any responsibility for the actions / omissions of third parties, including the way they use personal information received from this body or other independent sources.

- 9.5. Disclosure of personal information will only occur in event of complying with a legal obligation to, or a legitimate interest in law, including a response to official enquiries, requests, or court order from public or government authorities, or to protect the rights, privacy, safety, or property of Exceed the Bar (Pty) Ltd, its affiliates, Operators, data subjects or others.
- 9.6. This body does not share individual assessment results, legal case files, or recruitment candidate information with any individual or body, unless express informed written consent has been obtained from the data subject concerned.

10. AVAILABILITY OF THE MANUAL

10.1. A copy of the Manual is available-

10.1.1. on the body's website (www.exceedthebar.com);

10.1.2. head office of Exceed the Bar (Pty) Ltd 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, and excludes delivery costs.

10.3. If the data subject objects to the processing of his/her personal information by this body, he/she must complete "Form 1 - Objection to Processing of Personal Info (2018)" as available on the body's website.

10.4. If the data subject seeks access to any record, he/she must complete "Form 2 Reg 7 - Request for Access to Record" as available on the body's website.

10.5. If the data subject seeks to correct or delete personal information held by the body, or alternatively seeks to destroy or delete personal information held by the body, he/she must complete "Form 2 - Request to Correct/Delete Personal Info or to Destroy or Delete a Personal Record" as available on the body's website.

10.6. If the body has no legitimate reason or ground of justification for refusing a data subject access to a record, a copy of a record, or to correct, amend, delete or destroy a record as guided by PAIA and POPIA provisions, then it will make the record accessible or available to the data subject.

10.7. In event the body refuses access, the data subject may lodge a complaint to appeal to the Information Regulator and must then contact the Regulator and obtain the relevant complaint forms from the Regulator's website.

11. UPDATING OF THE MANUAL

The head of Exceed the Bar (Pty) Ltd will on a quarterly basis update this manual.

Issued by



Phoenix Bakker
Managing Director & Information Officer
Exceed the Bar (Pty) Ltd