

METROFILE GROUP

PAIA MANUAL

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



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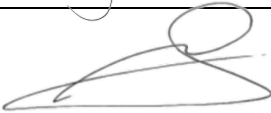

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i. CHANGE CONTROL – DOCUMENT CHANGE HISTORY

| | |
|----------------------------|--|
| VERSION NO. | 6.0 |
| DATE OF VERSION | 24 March 2026 |
| DATE OF NEXT REVIEW | March 2027 |
| POLICY OWNER | Elmarie Smuts |
| APPROVED BY | Elmarie Smuts, Wayne Clarke and Richard Buttle |

ii. DOCUMENT APPROVAL

| Authorised | Name & surname | Signature | Date of approval |
|---------------------------------------|----------------|--|------------------|
| Group Risk Officer | Elmarie Smuts |  | 24 March 2026 |
| Group Chief Executive Officer | Richard Buttle |  | 24 March 2026 |
| Group Chief Operations Officer | Wayne Clarke |  | 24 March 2026 |

Foreword

“Metrofile”, “Metrofile Group”, “Groups” or “We” refers to Metrofile Holdings (RF) (Pty) Ltd and its subsidiaries, affiliates, parent companies and any of their respective associated companies and related businesses, registered in the Republic of South Africa as listed below:

- Metrofile Management Services (Pty) Ltd
- Metrofile Training Academy (Pty) Ltd
- Metrofile (Pty) Ltd
- Archive Rental Systems (Pty) Ltd
- ETSU Properties (Pty) Ltd
- Records Storage and Management (Natal) (Pty) Ltd
- Records Storage and Management (North) (Pty) Ltd
- Records Storage and Management (Cape) (Pty) Ltd
- IronTree Internet Services (Pty) Ltd
- Metrofile Properties (Pty) Ltd
- Digital & Paper Properties (Pty) Ltd
- Cleardata (Pty) Ltd
- Global Continuity (SA) (Pty) Ltd
- Metrofile Vysion (Pty) Ltd
- Metrofile Products (Pty) Ltd
- Online Optical Solutions (Pty) Ltd



We are committed to compliance with the directives of the South African Constitution and national legislation.

The scope of this PAIA manual is limited to the records held by Metrofile Holdings (RF) (Pty) Ltd and its subsidiaries registered in South Africa.

1. Introduction

This manual was compiled in accordance with the Promotion of Access to Information Act No. 2 of 2000 (PAIA) and to address the requirements of the Protection of Personal Information Act No. 4 of 2013 (POPIA).

PAIA and POPIA give effect to Section 32 of the South African Constitution, which focuses on the right to access information i.e. everyone has the right of access to information held by the state or a private body to enforce a culture of transparency and accountability.

Section 51 of the PAIA requires Metrofile, as a private body, to compile an information manual providing information of both the types and categories of information records held by a private body, as well as providing procedures to be followed in requesting information.

2. Purpose of PAIA manual

This document serves as Metrofile's information manual and provides reference to the records held by Metrofile, as well as information on the process to follow to request access to such information. This PAIA manual is useful for the public to:

- 2.1. Check the categories of records held by Metrofile 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 Metrofile, by providing a description of the subjects on which Metrofile holds records and the categories of records held on each subject;
- 2.3. Know the description of the records of Metrofile that are available in accordance with any other legislation;
- 2.4. Access all the relevant contact details of the Privacy/ Information Officer and Deputy Privacy/ 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 Metrofile 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 Metrofile 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 Metrofile has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be Processed.

3. Contact details

The responsibility for administration of, and compliance with POPIA and PAIA, has been delegated by the Metrofile Group Chief Executive Officer (CEO) to the Privacy Officer. Requests pursuant to the provisions of these Acts should be directed as follows:

Privacy Officer: Elmarie Smuts
 Contact person: Elmarie Smuts
 Postal address: P O Box 40264,
 Cleveland,
 Gauteng, 2022
 Physical address: 3 Gowie Road
 The Gables
 Cleveland
 Gauteng
 2094
 Phone number: 011 677 3000
 Email address: privacy@metrofilegroup.com
 Website: www.metrofile.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 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 (IO) 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;

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. 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
 - 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 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 (i.e. Metrofile's Privacy Officer or Group CEO);
- 4.3.7. The provisions of sections 14⁵ and 51⁶ requiring a public body and private body (e.g. Metrofile), 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 (e.g. Metrofile), 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.

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

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;

- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies (e.g. Metrofile), 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 Metrofile Privacy Officer;
 - 4.5.2. From the website of the Regulator (<https://info regulator.org.za/paia-guidelines/>)
- 4.6. A copy of the Guide is also available in the official languages as published on the Information Regulator's website, for public inspection during normal office hours.

5. Categories of records of Metrofile which are available without a person having to request access (i.e. automatic disclosure)

The following records are automatically available to the public at the registered offices of Metrofile on payment of the prescribed fee for reproduction.

- Companies and Intellectual Properties Commission (CIPC) related documents in accordance with the requirements set out in section 25 of the Companies Act 71 of 2008
- Product and promotional brochures
- News and other marketing information

6. Description of the records of Metrofile which are available in accordance with any other legislation (i.e. legislative records)

Metrofile keeps information and records in accordance with legislation, which includes, but is not limited to the following legislation (note that this includes any Acts amending these Acts):

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act No. 71 of 2008, Companies Amendment Act No. 16 of 2024, Companies Amendment Act No. 17 of 2024
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 2008
- Electronic Communications Amendment Act 1 of 2014
- Employment Equity Act 55 of 1998
- Income Tax Act No. 21 of 1994
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Protection of Personal Information Act No. 4 of 2013
- Skills Development Levies Act 9 of 1999
- Tax Administration Act No. 28 of 2011
- Unemployment Insurance Act 63 of 2001

(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."*

- Value-Added Tax Act No. 89 of 1991

7. Categories of records held by Metrofile

NOTE: If a request for information, which Metrofile deems as highly confidential information, is received, Metrofile holds the right to assess whether the disclosure of such information is appropriate and does not create a legal risk to Metrofile and/or its stakeholders.

| Business information |
|---|
| <ol style="list-style-type: none"> 1. Documents of incorporation 2. Memorandum and articles of association 3. Records relating to the appointment of directors/ auditor / company secretary / public officer and other officers 4. Share register and other statutory registers |
| Financial records |
| <ol style="list-style-type: none"> 1. Annual financial statements and related financial records 2. Tax returns 3. Accounting records 4. Banking records 5. Related agreements 6. Invoices 7. General correspondence |
| Income tax records |
| <ol style="list-style-type: none"> 1. PAYE and related income tax records 2. Records of payments made to SARS 3. All other statutory compliances, for example: <ul style="list-style-type: none"> • VAT • Skills Development Levies • UIF • Workmen's Compensation |
| Human resources |
| <ol style="list-style-type: none"> 1. Employment contracts 2. Employment equity plan (where applicable) 3. Medical aid records 4. Pension fund records 5. Disciplinary records 6. Salary records 7. SETA records 8. Disciplinary code 9. Leave records 10. Training records 11. Training manuals 12. Occupational Health and Safety records |

Customer service records

1. Customer business information and related correspondence
2. Customer contracts
3. Complaint information
4. Legal documentation

8. Access request procedure

The access request procedure is contained in the Guide as referred to in **section 4** of this manual and as published by the Information Regulator. It is important to note that the successful completion and submission of an access request does not automatically allow the requester access to the requested record. An application to gain access to a record is subject to certain limitations if the requested record falls within a certain category as specified in PAIA. Further to this, the request for access to Personal Information must be in line with the provisions of Section 23 of POPIA and further in line with applicable exemptions as per Sections 36 – 39 of POPIA.

A person who requests access to records must complete the necessary access request form, as set out in the Guide, and the completed form must be marked for the attention of the Privacy Officer and sent to the contact details contained in this PAIA manual.

8.1. Completion of access request form

To allow for a timely response to requests for access to information, all requesters should take note of the following when completing the access request form:

- The access request form must be completed in full.
- Proof of identity is required to authenticate the identity of the requester. Therefore, in addition to the access request form, requestors will be required to supply a certified copy of their identification document (not older than 3 months).
- Provide explanation of which requested record is required for the exercise or protection of that right.
- Provide proof of the capacity in which the requester is requesting the information. Proof of identification of the requestor (and related third parties acting on behalf of the requestor) must be provided on submitting the access request form.

The applicable forms are available on the Information Regulator's website as follows:
<https://inforegulator.org.za/paia/>

8.2. Request fees

Fees may be charged in line with the allowable fees as published by the Information Regulator in the Guide.

8.3. Payment of fees

Payment details can be obtained from the contact person as indicated above and can be made via a direct deposit. Proof of payment must be supplied. The fee must be paid prior to access being given to the requested record.

8.4. Notification

Metrofile will grant or decline a request in line with the Guide published by the Information Regulator.

8.5. Grounds for refusal

The main grounds for refusal of a request are contained in the Guide published by the Information Regulator and may include, but are not limited to:

- Mandatory protection of the privacy of a third party who is natural or juristic person, which would involve the unreasonable disclosure of Personal Information of that natural or juristic person.
- Mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that party.
 - Financial, commercial, scientific or technical information, which disclosure could likely cause harm to the financial or commercial interests of that party.
 - Information disclosed in confidence by a third party to the company if the disclosure could put that third party to a disadvantage in negotiations or commercial competition.
 - Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
 - Mandatory protection of the safety of individuals and the protection of property.
 - Mandatory protection of records which could be regarded as privileged in legal proceedings.
 - The commercial activities of the company which may include:
 - Trade secrets of the company.
 - Financial, commercial, scientific or technical information, which disclosure could likely cause harm to the financial or commercial interests of the company.
- Mandatory protection of information, if leaked or shared can result in a breach of non-disclosure agreements, confidentiality and/or other applicable legal instruments between Metrofile and a natural or juristic person.

9. Processing of Personal Information

9.1. Purpose of Processing Personal Information

For the Metrofile Group to provide the products or services procured by its clients, it requires certain of the client's Personal Information. The client's Personal Information will be Processed by Metrofile as defined in its Privacy Policy (<https://www.metrofile.com/privacy-policy/>) in order to provide the products or services and give effect to applicable contracts between Metrofile and its customer.

Metrofile will Process service providers/ employees' Personal Information only to give effect to the Processing activities of Personal Information as noted in its Privacy Policy (<https://www.metrofile.com/privacy-policy/>) and to give effect to applicable contracts between Metrofile and its service providers/ employees.

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

Metrofile may Process its Data Subject's Personal Information in a number of ways when the Data Subject:

- Visits our website, we may collect usage information which may include the Data Subject's IP address, geographical location, cookies, browser type and version, operating system, referral source, duration of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of the Data Subject's services use. This information may be Processed for the purposes of analysing the use of the website and improving usability;

- Provides Personal Information when purchasing our products and/ or services. The information is Processed for use and/ or the administration of the contract with the Data Subject and in order to supply the products and/ or services the Data Subject require, communicating with the Data Subject and establishing and maintaining a business relationship with the Data Subject. The Personal Information we collect may include, but is not limited to, business name, registration number, vat number, directors and representatives' first names and surnames, credit card information or bank account details, and. registered and/ or business address and email address;
- Provides Personal Information in the course of a submission of an enquiry, including an enquiry pertaining to available service provider opportunities, on our “contact us” page on our website. The Personal Information is Processed for the purpose of responding to the Data Subject’s enquiry. The Personal Information we collect may include, but is not limited to, the Data Subject’s business name, directors and representatives’ first names and surnames, registered and/or business address and email address;
- We may Process Personal Information that the Data Subject provides to us for the purpose of subscribing to our email notifications and/ or newsletters. This information may be Processed for the purposes of sending the Data Subject relevant notifications and/ or newsletters. The Data Subject may choose to opt-out of receiving these communications at any given time by notifying us or by unsubscribing from the mailing list;
- On an ad-hoc basis the Data Subject may provide us with certain Personal Information on a voluntary basis when the Data Subject fills out an enquiry form in the question section of our “contact us” page, contact us via social media, when the Data Subject emails us, or when the Data Subject provides Personal Information to support a request logged by the Data Subject to us for the above collection means;
- Provides Personal Information for a supplier or service provider opportunity in the form of request for proposal (RFP), request for quotation (RFQ) and/ or request for information (RFI). The information is Processed for the purpose of carrying out a proper tender process. Such information may include, but is not limited to, information about the incorporation or registered name of the Data Subject’s business, tax information, BBBEE information, business address and business’ contact person’s first name, surname and/ or email address;
- Provide Personal Information when we appoint or use the Data Subject as a supplier or third party in order to purchase the Data Subject’s products and/ or services. The information is Processed for use and/ or the administration of the contract with the Data Subject, and to use the products and/ or services we procure from the Data Subject. The Personal Information we collect may include, but is not limited to, the Data Subject’s business name, directors and representatives’ first names and surnames, bank details, registered and/or business address and email address;
- Provide Personal Information when we enter into an employer/ employee relationship. The information Processed may include, but is not limited to, names, address, qualifications, gender, race, identity document, bank details, email address; and/or
- Provide Personal Information when the Data Subject becomes a shareholder of the company.

9.3. The recipients or categories of recipients to whom the Personal Information may be supplied

We may disclose a Data Subject’s Personal Information to third parties where required by law, where it is necessary to give effect to a contract with the Data Subject, or where we have a legal legitimate interest in doing so. For example, we may share a Data Subject’s Personal Information with the following third parties:

- Other subsidiaries and entities of the Metrofile Group, some of which may be located outside the

borders of the Data Subject's jurisdiction;

- Our hosting and software development partners, as well as other third party service providers who assist us with operating the website, or the products and/or services;
- Researchers and analytics providers;
- Lawyers, bookkeepers, auditors and accountants of the Metrofile Group;
- Third parties as required by law;
- Third parties to perform a credit assessment on the Data Subject, or debt collectors

Should there be a sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of any member of the Metrofile Group, we may transfer the Data Subject's information to third parties involved in the sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation.

By providing any Personal Information to us, the Data Subject fully understands and clearly consent to the fact that we may transfer such Personal Information in these cases.

Note: When we share Personal Information with these third parties, we will require them to honour our Privacy Policy, to the full extent required by applicable law.

We may also disclose a Data Subject's Personal Information if permitted by law or required to do so by law or where we believe such action is necessary in order to protect or defend our interests or the interests of our clients or users of our website, products and/or services. Such instances can include disclosing the Data Subject's Personal Information to the following:

- To regulators as law or governmental authorities requires;
- Law enforcement as subpoena, law or court order requires; and/or
- Other third parties as applicable law requires.

9.4. Planned transborder flows of Personal Information

As is common for websites and based on our international footprint, we may automatically transfer a Data Subject's Personal Information outside of the jurisdiction in which it was collected to a foreign jurisdiction. At times, we may transfer a Data Subject's Personal Information to our Group companies, some of whom may be located outside the borders of the Data Subject's jurisdiction, for business development, market research or to share it between Group companies for direct marketing purposes. We undertake to comply with the requirements in this regard as set out in the applicable data protection legislation.

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

We take protection of Personal Information seriously and we take precautions to keep Personal Information secure. Therefore, with due regard to generally accepted information security and handling practices and procedures we seek to secure the integrity and confidentiality of Personal Information in our possession by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of Personal Information, and unlawful access to or Processing of Personal Information. Please refer to our Privacy Policy (<https://www.metrofile.com/privacy-policy/>) in this regard.

10. Key definitions

Consent refers to voluntary agreement to some act, practice or purpose. It has two elements: knowledge of the matter agreed to, and voluntary agreement. Consent can be express or implied.

Express consent is given explicitly, either orally or in writing. Implied consent arises where consent may reasonably be inferred in the circumstances from the conduct of the individual and the organisation.

Data Subject refers to the person (natural or juristic, where applicable) to whom the Personal Information relates.

Operator refers to a person who Processes Personal Information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

‘Our’, ‘us’, ‘we’ or ‘company’ refers to Metrofile Holdings RF (Pty) Ltd (“Metrofile”), its subsidiaries, affiliates, parent companies and any of their respective associated companies and related businesses (“Metrofile Group” or “Group”).

Personal Information refers to information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including—

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- (b) dissemination by means of transmission, distribution or making available in any other form; or
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

Third Party refers to any entity, individual, trust, partnership, or joint venture, whom is not part of the Metrofile Group organisational structure. Examples include consultants, outsourcers, etc.

11. Availability of this manual

11.1. A copy of the manual is available:

11.1.1. On Metrofile’s website at <https://www.metrofile.com/paia/>;

11.1.2. From the head office of Metrofile for public inspection during normal business hours;

11.1.3. To any person upon request and upon the payment of a reasonable prescribed fee; and

11.1.4. To the Information Regulator upon request.

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

12. Updating of the manual

The Privacy Officer of Metrofile will on a regular basis update this manual.

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