

National Pride

PAIA MANUAL

2025

Abstract

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

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List of acronyms and abbreviations

The following words shall bear the same meaning as under PoPIA:

"CEO" means the Chief Executive Officer

"DIO" means the Deputy Information Officer;

"COO" means the Chief Information Officer

"Minister" means the Minister of Justice and Correctional Services

"PAIA" means Promotion of Access to Information Act No. 2 of 2000(as Amended);

"POPIA" means the Protection of Personal Information Act No.4 of 2013;

"Regulator" means the Information Regulator;

"Republic" means the Republic of South Africa

"Consent" means a voluntary, specific and informed expression of will in terms of which a Data Subject agrees to the processing of Personal Information relating to him or her

"Data Subject" means the person to whom Personal Information relates

"Information Officer" means the head of National Pride (Pty) Ltd as contemplated in section 1 of POPIA

"Personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including:

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
- the blood type or any other biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

"PoPIA" means Protection of Personal Information Act, Act No 4 of 2013

"Private body" means a natural person who carries or has carried on any trade, business or profession in that capacity, a partnership or juristic person

"Processing" means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

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

"Public body" means any department of state or administration in the national, provincial or local sphere of government or functionary exercising public power or exercising public function in terms of any legislation;

"Responsible party" means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information;

"Requester" in relation to -

- a public body, means any person making a request for access to a record of that public body (or authorised representative);
- a private body, means any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body (or authorised representative).

National Pride (Pty) Ltd Structure

We are a proud **LEVEL 4 BBBEE** South African personal care business. We manufacture and distribute disposable baby diapers and pants, feminine hygiene pads, baby wipes, adult incontinence, hand sanitiser and **SANS-certified face masks**.

Our Brand stable includes **Cuddlers®** (the first and only South African nappy brand available in all major retailers), **Baby Panda®** (market leader in Zambia, Zimbabwe, Malawi and DRC), **Active Care®** (incontinence products), **Simply Dry®** (sanitary pads).

We are the largest supplier of private label brands to leading retailers and wholesalers.

The National Pride factory, based in Johannesburg, is a new-generation facility that boasts the largest disposable diaper manufacturing capacity in Sub-Saharan Africa. Our Quality Management Systems are ISO 2001:2015 Certified.

Compliance to the PAPI Act

Section 51 of the Act requires Private Bodies to compile a Manual setting out the procedure and requirements to be adhered to in seeking to obtain access to information held by that Private Body. The section also stipulates the minimum requirements a Manual has to comply with. To this end section 51 of PAIA requires the Manual to contain, amongst others, the following:

- The postal and street address, phone and fax number and, if available, electronic mail address of the head of the body;
- Contact details of the Head of the Private Body;
- Categories of information available without formal request, if any;
- A description of the records available in accordance with other legislation;
- Sufficient detail to facilitate a request for access to a record of the Private Body;
- A description of the categories of subjects and of the information or categories of information;
- A description of the subjects on which the body holds records and the categories of records held on each subject,
- Such other information as may be prescribed

POPIA requirements pertaining to the processing of information

Purpose of processing

The Protection of Personal Information Act (PoPIA), Personal Information must be processed for a specified purpose. The purpose for which Personal Information is processed by National Pride (Pty) Ltd will depend on the nature of the Personal Information and the particular Data Subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time when Personal Information is collected.

Access to Personal Information

POPIA provides that a Data Subject may, upon proof of identity, request the Responsible Party to confirm, free of charge, all the information it holds about the Data Subject and may request access to such information, including information about the identity of third parties who have or have had access to such information. Further, POPIA provides that where the Data Subject is required to pay a fee for services provided to him/her, the Responsible Party must provide the Data Subject with a written estimate of the payable amount before providing the service and may require that the Data Subject pay a deposit for all or part of the fee.

Categories of Data Subjects

National Pride (Pty) Ltd holds information and records on the following categories of Data Subjects:

- a) employees / personnel of National Pride (Pty) Ltd;
- b) clients of National Pride (Pty) Ltd;
- c) any third parties and/or suppliers with whom National Pride (Pty) Ltd conducts its business services;
- d) contractors of National Pride (Pty) Ltd;
- e) partners and agents;
- f) service providers of National Pride (Pty) Ltd;

(This list of categories of Data Subjects is non-exhaustive).

The categories of recipients to whom the information is supplied

Depending on the nature of the Personal Information, National Pride (Pty) Ltd may supply information or records to the following categories of recipients:

- a) statutory oversight bodies, regulators, law enforcement agencies or judicial commissions of enquiry making a request for information;
- b) any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules (e.g the Information Regulator);
- c) South African Revenue Services, or another similar authority;
- d) Emergency Service Organisations (if you make an emergency call), including your approximate location;

e) anyone making a successful application for access in terms of PAIA;

f) subject to the provisions of POPIA and the National Credit Act No. 34 of 2005, National Pride (Pty) Ltd may share information about a client's creditworthiness with any credit bureau or credit provider.

Contact Details of the Organisation & Public Protector

Company Registration Number	2019/111267/07
Chief Executive Officer	Mark Russell mark@npride.co.za
Chief Operation Officer	Kugin Muthu kugin@npride.co.za
Information Officer	
Physical Address	114 Axle Road, cnr Axle & East Road Devland Soweto 1813
Postal Address	PO Box 2489, Lenasia, 1820
Telephone	Tel: +27 (0) 11 938 4660/1
Fax	+27 (0) 11 933 1781 / 086 567 7285
Email	Info@npride.co.za
Web Address	www.npride.co.za www.cuddlers.co.za
Information Regulator:	P.O. Box 31533, Braamfontein, Johannesburg, 2017 Telephone: (010) 023 5200 Website: www.justice.gov.za Email: PAIACompliance.IR@justice.gov.za

South African Human Rights Commission (SAHRC)	Braampark Forum 3, 33 Hoofd Street, Braamfontein, Johannesburg, 2041 Private Bag X2700, Houghton, 2041 Telephone: (011) 877 3600 Fax number: (011) 403 0625 Website: www.sahrc.org.za
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Purpose of Processing

In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which personal information is processed by National Pride (Pty) Ltd will depend on the nature of the personal information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.

Planned transborder flow of information -

If you are visiting our websites from a country other than the country in which our servers are located, the various communications will necessarily result in the transfer of information across international boundaries.

We may need to transfer your information to service providers in countries outside South Africa, in which case we will fully comply with applicable data protection legislation. These countries may not have data-protection laws which are similar to those of South Africa.

Security measures implemented to ensure the confidentiality and privacy of the information which is to be processed -

We are committed to implementing data security safeguards.

We have a specialised IT team who constantly review and improve our measures to protect your personal information from unauthorised access, accidental loss, disclosure or destruction.

If we have a contract with another organisation to provide us with services or a service on our behalf to process your personal information, we will make sure they have appropriate security measures and only process your information in the way we have authorised them to. These organisations won't be entitled to use your personal information for their own purposes. If necessary, our IT team will check them to make sure they meet the security requirements we have set.

Communications over the internet (such as emails) are not secure unless they've been encrypted. Your communications may go through a number of countries before being delivered-as this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

Purpose of PAIA Manual

This PAIA Manual is useful for the public to-

- check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 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;
- know the description of the records of the body which are available in accordance with any other legislation;
- 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;
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 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;
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom the personal information may be supplied;
- 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
- know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

Guide on how to use PAIA and how to obtain access to the guide

The Regulator has, in terms of section 10(1) of PAIA, 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.

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

The aforesaid Guide contains the description of-

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of-
 - the Information Officer of every public body, and
 - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for-
 - access to a record of a public body contemplated in section 11; and
 - access to a record of a private body contemplated in section 50;
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- 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-
 - an internal appeal;
 - a complaint to the Regulator; and
 - 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;
- the provisions of sections 14¹ and 51² requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

¹ 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.

² 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.

- the provisions of sections 15³ and 52⁴ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - the notices issued in terms of sections 22⁵ and 54⁶ regarding fees to be paid in relation to requests for access; and
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- the regulations made in terms of section 92⁷.

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.

The Guide can also be obtained-

- upon request to the Information Officer;
- from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

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

³ 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

⁴ 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

⁵ 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.

⁶ 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.

⁷ 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.”

Categories of records of National Pride (Pty) Ltd which are available without a person having to request access

*NB: Please specify the categories of records held by the body which are available without a person having to request access by completing **Form 2**, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.*

The following are categories of records automatically available:

Description of category of records automatically available in terms of section 52(1)(a) of the PAIA Act	Manner of access to records (Section 52(1)(b))
For inspection in terms of section 52(1)(a)(i)	
BBBEE Certificate	Soft copy/website
Product Information	Soft copy/website
Public Customer Information	Softcopy
Registers	Softcopy
For copying in terms of section 52(1)(a)(ii)	
Annual Reports	Soft copy/website
Financial Statements	Soft copy/website
Available free of charge in terms of section 52(1)(a)(iii)	
Media Releases	Website/Soft copy

Description of the records of National Pride (Pty) Ltd which are available in accordance with any other legislation

National Pride (Pty) Ltd keeps information and/or documents in accordance with the following legislation (This is not an exhaustive list):

NB: This list is compiled based on the most relevant legislation to all business but may include legislation that is not relevant to National Pride. Similarly, this list may exclude legislation applicable to National Pride

Legislation	Type of information to be retained
a) Basic Conditions of Employment Act No. 75 of 1997	The Act requires employers to keep records of information containing the personal details of all its employees, working times and remuneration package.
b) Broad Based Black Economic Empowerment Act o. 53 of 2003 ("BBBEE")	The BBBEE Act has as one of its objectives the promotion of economic transformation in order to enable meaningful participation of black people in the mainstream economy. It is expected that companies should keep records of activities undertaken in order to promote economic transformation and meaningful participation of black people in the mainstream economy.
Companies Act No. 71 of 2008	The Act requires all company documents and records to be kept in a written format. Companies are also expected to maintain memorandum of incorporation and a record of their directors.
Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993	Employers are expected to keep a register, employee record or reproduction of same relating of wages, time worked, payment for piece work and overtime
Consumer Protection Act No. 68 of 2008	The Act applies to all transactions in South Africa and is aimed at promoting and protecting the economic interests of consumers. The Act however does not deal with consumer personal information nor impose obligations on businesses in respect of treatment and/or protection of such information.
Criminal Procedure act No. 51 of 1977	The Act makes provision for the admissibility of documents as evidence where such documents were compiled in the course of trade or business by persons who have personal knowledge of matters contained in the document.
Electronic Communications Act No. 36 of 2005	There are no specific requirements on the type of information to be retained. However it is expected that companies protect confidentiality of customer and to use it only for purpose authorized by the customer or in terms of the law

Electronic Communications and Transactions Act No. 25 of 2002	The Act requires that information emanating from electronic transactions only be collected, collated, processed and disclosed with customer's consent. Further, the purpose for which information is collected must be disclosed to the customer and must only be used for that purpose unless customer consents otherwise
Employment Equity Act No. 55 of 1998	Employers are required to maintain records relating to the workforce, employment equity plans and other relevant records National Pride (Pty) Ltd is a designated employer and complies with the requirements as set out in this act.
Financial Advisory and Intermediary Services Act No. 37 of 2003	An authorized financial service provider is required to maintain records relating to: premature cancellation of transactions or financial products complaints received and an indication whether such complaints were resolved cases of non-compliance with the Act and reasons for such non-compliance
Financial Intelligence and Centre Act No. 38 of 2001	The Act requires that prior to establishing a relationship with a client Intelligence Centre's should collect information relating to Client's Identity Document ID of a person on whose behalf the client is acting and proof of authority Nature of business relationship/transaction Amounts involved Details of employee who captured info on behalf of company
Labour Relations Act No. 66 of 1995	The Act requires employers to keep records of disciplinary transgressions against employees, actions taken and reasons for the action
National Credit Act No. 34 of 2005	A credit provider is expected to maintain records of all applications for credit, credit agreements and credit accounts in the prescribed manner and form and for the prescribed time.
Occupational Health and Safety Act No. 85 of 1993	Employers are required to keep records relating to the health and safety of persons in the workplace
Pension Funds Act 24 of 1956	Every fund is expected to maintain books of account and other records as may be necessary for the purpose of the fund. All the money and assets belonging to the fund may be kept in the name of the pension fund by other institutions subject to conditions determined by the Minister

Prevention and Combating of Corrupt Activities Act No. 12 of 2004	The Act provides for the strengthening of measures to prevent and combat corruption and corrupt activities. To this end companies are expected to keep records relating to any offer of improper gratification relating to the procurement or execution of contracts or employment relationship
Prevention of Organized Crime Act No. 121 of 1998	The Act requires that any person who is aware of criminal activities is obliged to report them to the authorities. The duty of confidentiality or other restrictions on the disclosure of information, whether imposed by law, the common law or by agreement does not affect the obligation to report or disclose information or to permit access to any registers, records or other documents unless that obligation of confidentiality relates to attorney-client privilege.
Public Prosecution Authority Act No. 32 of 1998	The Act regulates the establishment of a single National Prosecuting Authority. To this end the Director-General: Justice is required to cause the necessary accounting and other related records to be kept by the National Prosecuting Authority.
Skills Development Act no. 97 of 1998	The Act requires, amongst other things, that employers who commence with learnership programmes to enter into learnership agreements with the learner concerned specifying the learnership to be provided, the duration of the learnership and an undertaking to provide the learner with the specified practical experience. To comply with this requirement Employers are expected to keep records of all learnership agreements.
Skills Development Levies Act No. 9 of 1999	Every employer is expected to make payments towards the skills development levy at a rate of 1% of the leviable amount. Records detailing payments made by the Employer are expected to be kept.
Unemployment Insurance Act No. 30 of 1996	An Employer is expected to keep records relating to payment of contributions to the Unemployment Insurance Fund relating to: illness, maternity and for dependents. The Act does however, subject to the provisions of the Promotion of Access to Information Act, No. 2 of 2000, prohibits the disclosure of information obtained in the performance of functions under the Act.

Description of the subjects on which the body holds records and categories of records held on each subject by the National Pride (Pty) Ltd

The inclusion of any subject or category of records should not be taken as an indication that records falling within those subjects and/or categories will be made available under the Act. In particular, certain grounds of refusal as set out in the Act may be applicable to a request for such records.

We hold the following subjects and categories of records:

- A. Company Records
- B. Business Records
- C. Financial Records
- D. Insurance Records
- E. Personnel Records
- F. Policies and Directives
- G. Agreements and Contracts
- H. Regulatory documents
- I. Published information
- J. Customer information
- K. Reference material
- L. Product information

Company Records

Company records are all our records related to the incorporation and administration of our company. Some of them are available from the Companies and Intellectual Property Commission (CIPC)

Category Detail	Format available
Memorandum of incorporation	Automatically available from CIPC
Directors' names	Automatically available from CIPC
Documents of incorporation	Automatically available from CIPC
Minutes of board of directors' meetings	Not automatically available
Written resolutions	Not automatically available
Records relating to appointment of directors, auditor, secretary, public officer, or other officers	Not automatically available
Share register, share certificates and other statutory registers	Not automatically available
Debt securities, share incentives schemes or trusts	Not automatically available
Shareholders' agreement	Not automatically available
Other statutory records	Not automatically available

Business Records

Business records include any documents that have economic value to the business

Category Detail	Format available
Operational records and reports	Not automatically available
Databases	Not automatically available
Published works	Not automatically available
Internal correspondence	Not automatically available
Product records	Not automatically available
Profiles of subsidiary companies	Not automatically available

Financial Records

Category Detail	Format available
Financial statements	Not automatically available (NDA required)
Tax returns	Not automatically available
Other documents relating to taxation of the company	Not automatically available
Accounting records	Not automatically available
Banking records	Not automatically available
Banking details	Available on request
Bank statements	Not automatically available
Electronic banking records	Not automatically available
Paid cheques	Not automatically available
Asset register	Not automatically available
Not automatically available	Not automatically available

Rental agreements	Not automatically available
Not automatically available	Not automatically available
Invoices	Not automatically available
Financial agreements	Not automatically available

Insurance Records

Category Detail	Format available
Insurance policies held by the company	Not automatically available
Register of all immovable property owned by the company	Not automatically available

Income Tax Records

Category Detail	Format available
PAYE records	Not automatically available
Corporate tax records	Not automatically available
Customs tax	Not automatically available
Documents issued to employees for income tax purposes	Not automatically available
Records of payments made to SARS on behalf of employees	Not automatically available
VAT records	Not automatically available
Regional services levies	Not automatically available
Skills development levies	Not automatically available
UIF	Not automatically available
Workmen's compensation	Not automatically available

Personnel Records

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

Category Detail	Format available
List of employees	Not automatically available
Employee personal information	Not automatically available
Employee employment contracts	Not automatically available
Employment policies and procedures	Not automatically available
Employment equity plan	Not automatically available
Medical aid records	Not automatically available
Pension fund records	Available at the Registrar of pension funds
Salaries of employees	Not automatically available
Leave records	Not automatically available
Internal evaluations	Not automatically available
Disciplinary records	Not automatically available
Disciplinary codes	Not automatically available
Training records	Not automatically available
Operating manuals	Not automatically available
Personal records provided by personnel	Not automatically available
Other statutory records	Not automatically available
Related correspondence	Not automatically available

Personnel records include records about our employees and contractors. No information will be shared without the explicit consent of the employee, except in circumstances where legal requirement or health emergencies take preference.

Policies and Directives

Category Detail	Format available
Internal relating to employees and the company	Not automatically available
External relating to clients and other third parties	Not automatically available
Information technology systems and documents	Not automatically available

Agreements and contracts

Category Detail	Format available
Standard agreements	Not automatically available
Contracts concluded with customers	Not automatically available
NDAs	Not automatically available

Letters of Intent, MOUs	Not automatically available
Third party contracts (such as JV agreements, VAR agreements, etc.)	Not automatically available
Office management contracts	Not automatically available
Supplier contracts	Not automatically available
Tender contracts	Not automatically available

Environmental Records

Not automatically available

Regulatory Records

Category Detail	Format available
Permits	Not automatically available
Licences	Not automatically available
Authorities	Not automatically available
Environmental approvals	Not automatically available
Local authority approvals	Not automatically available
Incidence records and statistics	Not automatically available
Risk management system	Not automatically available
Operational risk review reports	Not automatically available

Published Information

Category Detail	Format available
External newsletters and circulars	Automatically available
Internal newsletters and circulars	Not automatically available
Information on the company published by third parties	Not automatically available

Customer Information

Category Detail	Format available
Customer details	Not automatically available
Contact details of individuals within customers	Not automatically available
Communications with customers	Not automatically available
Sales records	Not automatically available
Transactional information	Not automatically available
Marketing records	Not automatically available

Reference Material

Category Detail	Format available
Books	Not automatically available
Newsletters and journals articles	Not automatically available
Magazines	Not automatically available
Newspaper articles	Not automatically available

Examples of data that may not be included in the above categories and not automatically available.

- Company Secretary Compliance with Corporate Governance (King Commission)
 - Memorandum and Articles of Association
 - Company Register
 - Shareholders Agreement
 - Share Incentive Schemes / Trusts
 - Share Certificates
 - Debt securities
 - Register of debenture holders
 - Board Meetings:
 - Attendance register
 - Resolutions
 - Presentations by various divisions
 - Minute books
 - Delegation of Authorities:
 - Financial Reports
 - Directors' records
 - Profiles of subsidiary companies
 - General correspondence
 - Finance & Invoices:
 - Credit / Debit Notes
 - Journals, Ledgers & Balance Sheets
 - Income Statements
 - Banking records
 - Trial Balance Statements
 - Cash Flow Statements

- Tax invoices / returns
- Salary information
- Auditors Report
- Internal Policies & Procedures
- General correspondence
- Administration Suppliers
- Debtors and Creditors
- Insurance Policies
- Lease Agreements
- Office Building Structures
- Tender Contracts
- Employees travel records
- Internal Policies and procedures
- General correspondence
- Operational risk review reports
- Incidence records and statistics
- Training course material
- Environmental approvals
- Local Authority Approvals
- Call data records (date, time, duration and number dialled)
- Internal Policies and Procedures
- General correspondence
- Safety, Health and Environmental Risk Management Incidence reports and statistics:
- Audit Reports
- Risk Management System
- Operational Risk Review Reports
- Internal Policies and Procedures
- General correspondence
- Commercial Legal
- Contracts / Agreements

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

***NB:** Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.*

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
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus
Identity number and names, contact details and next of kin	Emergency Services (IOD cases)

How to request access to information

National Pride has authorised and designated our information officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of PAIA. To request access to a record, please complete **Form 2** which is available from

- The National Pride website
- via direct request from the information officer or
- via the SAHRC website
- [Form 02: Request for Access to Record \[Regulation 7\] – public & private bodies;](#)
- [Form 03: Outcome of request and of fees payable \[Regulation 8\] – public & private bodies;](#)

Please submit the completed form to our information officer together with the relevant request fee:

- directly at our offices
- via email

When completing your request please ensure that:

- the form is completed in detail and with correct information;
- you are specific in terms of the information you are requesting and which form of access you require access;
- the form has enough information for the information officer to identify you,
- specifies your email address, postal address, or fax number;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

To ensure speedy, efficient and professional assistance please use the standard form referenced.

Failure to use the correct form:

- may result in your request being rejected due to lack of procedural compliance;
- may see your request being refused if you do not provide sufficient information; or
- could result in a delay to process and action your request.

Grounds for Refusal

The following are grounds upon which the NATIONAL PRIDE (PTY) LTD may, subject to the exceptions in Chapter 4 of PAIA, refuse a request for access in accordance with Chapter 4 of PAIA:

- i) Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable
- ii) Mandatory protection of the commercial information of a third party, if the Records contain:
 - Trade secrets of that third party.

- Financial, commercial, scientific, or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
- Information disclosed in confidence by a third party to the NATIONAL PRIDE (PTY) LTD, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.

iii) Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.

vi) Mandatory protection of the safety of individuals and the protection of property.

v) Mandatory protection of Records that would be regarded as privileged in legal proceedings.

vi) Protection of the commercial information of the NATIONAL PRIDE (PTY) LTD, which may include:

- Trade secrets.
- Financial/commercial, scientific, or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the NATIONAL PRIDE (PTY) LTD.
- Information which, if disclosed, could put NATIONAL PRIDE (PTY) LTD at a disadvantage in contractual or other negotiations or prejudice the Company in commercial competition; and/or
- Computer programs which are owned by the NATIONAL PRIDE (PTY) LTD, and which are protected by copyright and intellectual property laws.

vii) Research information of the NATIONAL PRIDE (PTY) LTD or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and

viii) Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

Availability of the manual

A copy of the Manual is available via the following action routes:

- www.nationalpride.co.za
- Head Office of National Pride (Pty) Ltd for public inspection during normal business hours;

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

To the Information Regulator upon request.

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.

Updating of the manual

The Information Officer of a National Pride (Pty) Ltd will on update this manual as and when legislation prescribes or at a minimum have an annual review.

Issued by

Mark Russell

Chief Executive Officer

Annexure A | Update on Changes of Forms

INFORMATION REGULATOR

NEW INFORMATION FORMS FOR PAIA MANUALS

Dear employer

On Tuesday, 10 October 2023, NEASA received an email and notice from the Information Regulator.

This notice is applicable to all businesses.

The notice states the following:

“The Minister of Justice and Correctional Services has, on 27 August 2021, gazetted the Regulations relating to the Promotion of Access to Information Act, 2021 (“PAIA Regulations”). In terms of PAIA Regulations, regulation 17(1) thereof, the following forms have been repealed-

- *Form A – Request for access to record of a public body;*
- *Form B – Notice of Internal Appeal; and*
- *Form C – Request for access to record of a private body.”*

The Regulator has noticed that there are some private and public bodies that still have the abovementioned forms on their websites, and this is “hampering the right of access to information.” In accordance with the notice and the relevant PAIA regulations, all responsible parties are hereby requested to ensure that the following prescribed forms are uploaded on their websites or included in their PAIA Manuals, within 14 days of receipt or publication of this notice:

- Form 02: Request for Access to Record [Regulation 7] – public & private bodies;
- Form 03: Outcome of request and of fees payable [Regulation 8] – public & private bodies; and
- Form 04: Internal Appeal Form [Regulation 9] – public bodies only.

All businesses (private bodies) should download Form 02 and 03 and place them on their website.