



# inlexso (Pty) Ltd

**1999/014204/07**

## ACCESS TO AND PROTECTION OF INFORMATION MANUAL

Published in terms of Section 51 of the  
**Promotion of Access to Information Act  
2 of 2000**

*(Applicable provisions of the Protection of Personal Information Act 4 of 2013 are included in this Manual)*

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## 1. INTRODUCTION

inlexso Proprietary Limited (“inlexso”) consists of a group of attorneys, advocates and compliance specialists, specialising in the delivery of corporate governance, legal, risk and compliance management services. This manual is also applicable to inlexso transcription services<sup>1</sup>.

The Promotion of Access to Information Act 2 of 2000 (“PAIA” or “the Act”) fosters a corporate culture of transparency and accountability, within the context of the protection of Personal Information. inlexso is a “private body”, as described in PAIA.

PAIA provides that a person, other than a government department or agency, may only request information in terms of the Act, if the information is required for the exercise or protection of a right. Information will therefore not be furnished unless a person clearly provides sufficient particulars on the request form to enable inlexso’s Information Officer/ Deputy Information Officer to identify the Record and the Requester. The Requester should also indicate which form of access is required and indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

The Requester must identify the right that he or she is seeking to exercise or to protect as well as an explanation of why the requested information is required for the exercise or protection of that right.

In addition to this, such information may only be provided if:

- the person requesting the information complied with the procedural requirements of inlexso relating to such requests for information; and
- there is no ground on which to refuse access to such information.

### 1.1. Objectives of Manual

inlexso compiled this Access to and Protection of Information Manual (“Manual”) to facilitate requests for access to certain information and access to, the correction, deletion or destroying of Personal Information, as well as to set out the procedures to be followed in terms of both PAIA and the Protection of Personal Information Act 4 of 2013 (“POPIA”) to make such requests.

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<sup>1</sup> A division of inlexso (Pty) Ltd which deliver transcription services

This Manual provides an outline of the type of Records and the Personal Information that inlexso holds and explains how to submit requests for access to these Records in terms of PAIA. In addition, it explains how to access, or object to, Personal Information held by inlexso, or request correction or de-identification of the Personal Information, in terms of paragraphs 23 and 24 of POPIA.

This Manual has been prepared in terms of section 51 of PAIA and regulation 4(1)(c) of the Regulations relating to the Protection of Personal Information, 2018 of POPIA, for inlexso only. The intention is to ensure that inlexso complies with PAIA and POPIA and instils the principles of other relevant privacy legislation of South Africa by fostering the culture of transparency and accountability and giving effect to the right to information.

*Please note:* This Manual is not exhaustive, nor does it comprehensively deal with, every procedure provided for in POPIA and PAIA. Requesters are advised to familiarise themselves with the provisions of these Acts before making any requests to inlexso in terms of these Acts.

## 1.2. Availability of the inlexso PAIA manual

This Manual is published on inlexso's website at <https://inlexso.co.za/> or alternatively, a copy can be requested from the Information Officer/ Deputy Information Officer (see contact details in Clause 2 below).

This Manual may be amended from time to time and the final/ latest version of the manual will be made public.

## 1.3. Who may Request Access to Information

In terms of section 1 of PAIA, a "Requester", in relation to 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
- a person acting on behalf of the person contemplated in subparagraph (i).

The above means that, a Requester may act on behalf of a person in making a request for a Record.

In terms of section 53(2)(d) of PAIA, a request for access must at least require the requestor concerned to identify the right the Requester is seeking to exercise or protect and provide an explanation of why the requested Record is required for the exercise or protection of that right.

In essence, PAIA provides that a requestor will be entitled to access to a Record if the Record is required for the exercise or protection of a right.

Requests can be made:

- as a personal request;
- as an agent of a Requester on behalf of someone else; and
- as a Third Party seeking information.

1.4. Guidance to Requesters on how to use PAIA

Guidelines in terms of section 10 of PAIA that will facilitate ease of use of the Act for Requesters can be obtained from the Information Regulator of South Africa as set out below:

<p><b>Postal Address:</b> Information Regulator of South Africa P.O Box 31533, Braamfontein, Johannesburg, 2017</p>	<p><b>Physical Address</b> JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001</p>
<p>General enquiries email address: <a href="mailto:infoereg@justice.gov.za">infoereg@justice.gov.za</a> Complaints can be directed to: <a href="mailto:complaints.IR@justice.gov.za">complaints.IR@justice.gov.za</a></p>	

**2. CONTACT DETAILS OF INLEXSO**

Any requestor is advised to contact the Information Officer/ Deputy Information Officer should he / she require any assistance in respect of the utilisation of this Manual and/or the requesting of documents / information from inlexso.

<p><b>Managing Executive:</b> Clifford Anthony MacGregor <b>E-mail:</b> <a href="mailto:cliff.macgregor@inlexso.co.za">cliff.macgregor@inlexso.co.za</a></p>	<p><b>Information Officer:</b> Petronella Kotzé <b>Deputy Information Officer:</b> Thapelo David Mbita <b>E-mail:</b> <a href="mailto:compliance@inlexso.co.za">compliance@inlexso.co.za</a></p>
<p><b>Physical Address:</b> Building 3, Summit Place, 221 Garsfontein Road, Menlyn, Pretoria <b>Postal Address:</b> P.O Box 76391, Lynnwood Ridge, Pretoria, 0040 <b>Tel:</b> +27 12 942 5555      <b>Fax:</b> +27 86 265 7392</p>	

### 3. CLASSES OF RECORDS

#### 3.1. Records automatically available to the Public – PAIA Sec 51 (1) (c)

Please note that no description of category of Records have been submitted to the Minister in terms of section 52(1) of PAIA for publication.

The following Records are automatically available at the office of inlexso on payment of the prescribed fee as set out in Annexure 3 of this Manual for reproduction:

- Product and promotional brochures;
- Marketing information; and
- Documents and information relating to inlexso which is held by the Companies and Intellectual Properties Commission in accordance with the provisions of the Companies Act 71 of 2008;

Some of the information is freely available on inlexso’s website at <https://inlexso.co.za/>.

#### 3.2. Records available in accordance with other legislation - PAIA Sec 51 (1) (d)

Where applicable to its operation, inlexso also retains Records and documents in terms of legislation listed below for the relevant periods as provided in the applicable legislation. Please note that the Records referred to on the listed legislation below are not exhaustive and as such, each request for access to Record will be treated uniquely with consideration of applicable legislation, procedure and policy.

Records kept in accordance with such other legislation as applicable to inlexso which includes, but is not limited to:

<b>Employee-Employer relationship</b>	Basic Conditions of Employment Act, 75 of 1997
	Compensation of Occupational Injuries and Diseases Act, 130 of 1993
	Employment Equity Act, 55 of 1998
	Labour Relations Act, 66 of 1995
	Occupational Health and Safety Act, 85 of 1993
	Disaster Management Act, 57 of 2002
	Unemployment Insurance Act, 63 of 2001

	Skills Development Act 97 of 1998
	Pension Funds Act, 24 of 1956
<b>Revenue/ Income</b>	Value Added Tax Act, 89 of 1991
	Income Tax Act, 58 of 1962
	Skills Development Levies Act 9 of 1999
	Tax Administration Act, 28 of 2011
	Taxation Laws Amendment Act (latest amendment Act)
<b>General</b>	Protection of Personal Information Act, 4 of 2013
	Broad-Based Black Empowerment Act, 53 of 2003
	Companies Act, 71 of 2008
	Constitution of the Republic of South Africa Act, 108 of 1996
	Copyright Act, 98 of 1978
	Competition Act 89 of 1998
	Consumer Protection Act 68 of 2008
	Electronic Communications and Transaction Act; 25 of 2002

3.3. Information/ Records held by inlexso

This clause serves as a reference to the Records that inlexso holds. The information is classified and grouped according to Records relating to the following subjects and categories.<sup>2</sup>

It is Recorded that the accessibility of the documents listed herein below, may be subject to the grounds of refusal set out hereinafter:

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<sup>2</sup> Section 51(1)(e) of PAIA

<b>Human Resources and Financial Division</b>	Employee Records <sup>3</sup>
	Employment Contracts
	Employee Policies, Procedures and Guidelines
	Employee Disability Insurance Records
	Recruitment Records <sup>4</sup>
	Audited Financial Statements
	Income Statements
	Tax Invoices (Company & Employees)
	Management Accounts
	Expense Register
<b>Marketing</b>	Clients' Information and Database
	Product Offering Information and Brochures
	Development of new products
	Training schedules and material
	Correspondence relating to training
<b>Client related Records</b>	General Contract Documentation
	Statutory Records
	Records provided by a Third Party
	Transactional Records and Records relating to customers
	Correspondence with clients

<sup>3</sup> A personnel file containing confidential documents and Personal Information relating to the Employee and Records utilised by the employer, the employee, and the employee's manager, in some companies. (e.g. Remuneration, Medical Aid info, Employee Benefits and Disciplinary Records)

<sup>4</sup> Any Records relating to the recruitment process should be kept in a secure and confidential place. These Records may include the job analysis findings, job descriptions, job specifications, interview Rating Sheets, all applicant files for a specified period, response and success rate for different recruiting methods used.

<b>inlexso-related Records</b>	Financial Records
	Operational and transactional Records
	Statutory Records
	Internal Records and procedures
	General Correspondence
	Employee travel Records
	Suppliers
	Debtors and creditors
	Insurance policies
	Agreements
	Regulatory submissions

3.4. Other Information

inlexso may possess information and Records pertaining to other parties, including and without limitation: suppliers/ holding/ sister companies, joint ventures and service providers.

All inlexso clients are allowed to access their own information without having to go through this formal information request process provided that the information is not to be used in any legal action.

The process only applies to information that exist at the time of the request and it does not require the inlexso to create a Record which does not exist at the time of the request. If inlexso searches for a Record and it is believed that the Record either does not exist or cannot be found, the Requester will be Notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the Record.

3.5. Personal Information

inlexso may hold Personal Information of the following types of Data Subjects: Employees, clients, suppliers, holding or sister companies, joint ventures and/ or service providers or other organisations and persons.

#### **4. PROCESSING OF PERSONAL INFORMATION**

A Data Subject has the right to:

- request inlexso to confirm, free of charge, whether or not inlexso holds Personal Information about such Data Subject;
- request from inlexso the Record or a description of the Personal Information about him/ her or it, held by inlexso, including information about the identity of all Third Parties, or categories of Third Parties, who have, or have had, access to the information, within a reasonable time, at a prescribed fee (as set out in Annexure 3), if any, in a reasonable manner and format and in a form that is generally understandable;
- request inlexso to correct or delete Personal Information about him/ her or it in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully (see Annexure 5);
- request inlexso to destroy or delete a Record of Personal Information about him/ her or it that inlexso is no longer authorised to retain; or
- object to the Processing of their Personal Information (see Annexure 4).

inlexso will take all reasonable steps to confirm a Data Subject's identity before providing details of their Personal Information or making changes to their Personal Information.

inlexso will only Process Personal Information in accordance with the current South African privacy legislation such as POPIA. Accordingly, the relevant privacy conditions and requirements relating to the Processing of Personal Information will be applied. This will also be applied to Personal Information of Employees and Third Parties, as well as information received from Third Parties.

If a Data Subject is required by inlexso to pay a fee for services provided to the Data Subject to enable inlexso to respond to a request, inlexso-

- will give the Personal Requester a written estimate of the fee before providing the services and may require the Personal Requester to pay a deposit for all or part of the fee.
- may or must refuse, as the case may be, to disclose any information requested on the same grounds for refusal of access to Records as set out in *clause 6* of this Manual.

4.1. Access to health or other records

If inlexso's Information Officer grants a request for access to a Record provided by a health practitioner in his/ her capacity as such about the physical or mental health, or well-being-

- (a) of the Requester; or
- (b) if the request has been made on behalf of the person to whom the Record relates, of that person, *(in this clause, the Requester and person referred to in paragraphs (a) and (b), respectively, are referred to as the "Relevant Person")*, is of the opinion that the disclosure of the Record to the Relevant Person might cause serious harm to his/ her physical or mental health, or well-being, the Information Officer may, before giving access to such Record, consult with a health practitioner who has been nominated by the Relevant Person.

If the Relevant Person is-

- (a) under the age of 16 years, a person having parental responsibilities for the Relevant Person must make the nomination of a health practitioner or
- (b) incapable of managing his/her affairs, a person appointed by the court to manage those affairs must make that nomination.

If, after being given access to the Record concerned, the health practitioner consulted is of the opinion that the disclosure of the Record to the Relevant Person, would be likely to cause serious harm to his/ her physical or mental health, or well-being, the Information Officer may only give access to the Record if the Requester proves to the satisfaction of the Information Officer that adequate provision is made for such counselling or arrangements as are reasonably practicable before, during or after the disclosure of the Record to limit, alleviate or avoid such harm to the Relevant Person.

Before access to the Record is so given to the Requester, the person responsible for such counselling or arrangements will be given access to the Record.

If a request for access to Personal Information is made to inlexso and part of that information may or must be refused in terms of *Clause 6* of this Manual, every other part must be disclosed.

On receipt of a request to correct, destroy or delete a Data Subject's Personal Information, inlexso will, as soon as reasonably practicable adhere to the request and will provide the data subject, to his/ her satisfaction, with credible evidence in support of the information.

In instances where agreement cannot be reached between inlexso and the Data Subject, and if the Data Subject so requests, inlexso will take such steps as are reasonable in the circumstances, to attach to the information in such a manner that it will always be read with the information, an indication that a correction of the information has been requested but has not been made.

If inlexso has taken such steps that result in a change to the information and the changed information has an impact on decisions that have been or will be taken in respect of the Data Subject in question, the inlexso will, if reasonably practicable, inform each person or body or other organisation to whom the Personal Information has been disclosed of those steps.

Inlexso shall notify a Data Subject, who has made a request that his/ her or its Personal Information should be corrected, destroyed or deleted, of the action taken as a result of the request.

#### 4.2. Special Personal Information

The following Special Personal Information concerning a Data Subject will not be supplied to Third Parties without the consent of the Data Subject:

- religious or philosophical beliefs;
- trade union membership; and
- political persuasion.

inlexso will, in circumstances when it is not subjected to an obligation of confidentiality by virtue of office, profession or legal provision, treat the information relating to its Employees' health or sex life as confidential, unless it is required by law or in connection with its duties to communicate the information to other parties who are authorised to process such information in accordance with Section 32(1) of POPIA.

The Processing of information regarding the criminal behaviour or biometric information concerning personnel in the service of inlexso will take place in accordance with the rules established in compliance with labour legislation.

#### 4.3. Personal Information of children

Inlexso will only, when authorised by the Information Regulator, Process the Personal Information of children if the Processing is in the public interest and appropriate safeguards have been put in place to protect the Personal Information of the child.

If the Information Regulator has granted authorisation, inlexso will comply with the conditions imposed on it with regard to how it will:

- upon request of a Competent Person provide a reasonable means for that person to-
  - review the Personal Information Processed; and
  - refuse to permit its further Processing.

## **5. ACCESS PROCEDURE**

### **5.1. Guidance on Completion of Prescribed Access Form**

To facilitate the processing of your request, kindly:

- Use the prescribed Access Request Form and its annexures (Annexure A) below.
- Type or print in block letters.
- If a question is not applicable, answer as “N/A”.
- Proof of identity is required to identify the Requester.
- Provide sufficient details to enable an efficient processing of your request.
- Provide sufficient Records on the Record requested.
- Address the prescribed form to the contact details in Clause 2 above.
- If the Requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.

### **5.2. Submission of Prescribed Access Form**

The completed Access Request Form and its annexures, if applicable, must be submitted via registered mail, fax or email and must be addressed to the Information Officer/ Deputy Information Officer (details in Clause 2 above).

### **5.3. Applicable time periods**

inlexso will inform the Requester within 30 days after receipt of the request of its decision whether or not to grant the request. The 30-day period may be extended by a further period of not more than 30 days if the request is for a large number of Records or requires a search through a large number of Records and

compliance with the original period would unreasonably interfere with the activities of inlexso or the Records are not located at inlexso, or consultations with another private body is required.

## 6. REFUSAL OF ACCESS TO RECORDS

### 6.1. Grounds for refusal

The Information Officer is obliged to refuse access to a Record if:

- the disclosure would be an unreasonable disclosure of Personal Information about a Third Party, including a deceased individual;<sup>5</sup>
- the request for access will be refused if the Record contains trade secrets, financial, commercial, scientific or technical information of the body of the body or a Third Party that is likely to harm inlexso or Third Party;<sup>6</sup>
- if disclosure would constitute an action for breach of the duty of confidence owed to a Third Party in terms of an agreement;<sup>7</sup>
- disclosure could possibly result in endangering the life of physical safety of individuals and protection of property;
- disclosure would involve the unreasonable disclosure of Personal Information of that natural person's privacy (Section 63(1) of PAIA);
- violates the protection and safety of individuals and protection of property (Section 66 of PAIA);
- it is for the protection of Records which would be regarded as privileged in any legal proceedings, unless the person so entitled to privilege waives the privilege (Section 67 of PAIA);
- the disclosure of research information of inlexso or a Third Party on behalf of inlexso would expose the Third Party, inlexso, the researcher or the subject matter of the research to serious disadvantage; and
- the Information Officer is of the opinion that processing requests will be unreasonably time consuming and lead to waste of resources. In addition, the Information Officer may refuse access to a Record if the request is seen to be made by a Requester to unnecessarily annoy or provoke.

The Requester must pay the Prescribed Fee<sup>8</sup> (if applicable) before any further processing can take place.

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<sup>5</sup> See section 63 of POPIA

<sup>6</sup> Section 68 of PAIA Act

<sup>7</sup> Section 65 of PAIA Act

<sup>8</sup> See Payment of Prescribed Fees under clause 6.3 below

## 6.2. Remedies available when inlexso refuses a request for information

### Internal remedies

inlexso does not have internal appeal procedures regarding PAIA requests. As such, the decision made by the duly authorised person(s) in clause 1.4 is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator for relief.

### External remedies

Subject to the provisions of PAIA, a Requester that is dissatisfied with an Information Officer's refusal to disclose information, may within 30 days of notification of the decision, apply to a Court or to the Information Regulator for relief.

Likewise, a Third Party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 days of notification of the decision, apply to the Information Regulator or to a Court with appropriate jurisdiction, for relief. For purposes of the Act, courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and the Magistrate Court.

## 6.3. Prescribed Fees

PAIA and POPIA provides for two types of fees, namely:

- A Request Fee, which will be a standard fee; and
- An Access Fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs.

Prescribed Fees as published under Annexure A: Part III of the Regulations Regarding the Promotion of Access to Information are found in Annexure 3.

When the request is received by the Information Officer/ Deputy Information Officer, such officer shall by Notice require the Requester, other than a Personal Requester, to pay the prescribed Request Fee (if any), before further processing of the request.

If the search for a Record of inlexso has been made, by a Requester, other than a Personal Requester, and the preparation of the Record for disclosure, including any arrangements to make it available in the requested form, requires more than six hours, the Information Officer/ Deputy Information Officer shall

Notify the Requester to pay as a deposit of one third of the Access Fee, which would be payable if the request is granted.

This Notice will state-

- the amount of the deposit payable, if applicable;
- that the Requester may lodge an application with a court against the tender or payment of the Request Fee, or the tender or payment of a deposit, as the case may be; and
- the procedure (including the period) for lodging the application.

If a deposit has been paid in respect of a request for access which is refused, the Information Officer/ Deputy Information Officer will repay the deposit to the Requester.

The Information Officer/ Deputy Information Officer shall withhold a Record until the Requester has paid the required fees.

A Requester whose request for access to a Record has been granted, must pay an Access Fee for reproduction and for search and preparation, and for any time reasonably required in excess of six hours to search for and prepare the Record for disclosure including making arrangements to make it available in the request form.

If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer/ Deputy Information Officer must repay the deposit to the Requester.

The actual postage is payable when a copy of a Record must be posted to a Requester.

## 7. USEFUL TERMS

<b>Access Fee</b>	This is the fee paid by the Requester to the public or private body from which you are seeking the information, to cover the costs of finding and copying the Records you require.
<b>Biometric Information</b>	A technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.
<b>Child</b>	A natural person under the age of 18 years who is not legally competent, without the assistance of a Competent Person, to take any action or decision in respect of any matter concerning him- or herself.
<b>Collection</b>	The process of gathering and measuring Personal Information.
<b>Competent Person</b>	Any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a Child.
<b>Consent</b>	Any voluntary, specific and informed expression of will in terms of which permission is given for the Processing of Personal Information.
<b>Data Subject</b>	The person to whom the Personal Information relates.
<b>Destruction</b>	The process of destroying data stored on tapes, hard disks and other forms of electronic media or in hard copy so that it is completely unreadable and cannot be accessed or used for unauthorised purposes.
<b>Deputy Information Officer</b>	For purposes of this Manual, the Deputy Information Officer (sometimes referred to as DIO) is the person to whom the responsibility is delegated to handle PAIA and POPIA requests on behalf of inlexso and to perform other duties relating to these Acts as set out in his/ her appointment letter in Annexure 1.
<b>Information Officer</b>	For purposes of this Manual, the Information Officer (sometimes referred to as IO) is the person to whom the responsibility is delegated to manage the decisions regarding PAIA and POPIA requests on behalf of inlexso and to perform other duties relating to these Acts as set out in his/ her appointment letter in Annexure 1.
<b>Information Regulator</b>	The Information Regulator established in terms of section 39 of POPIA.
<b>Letter of Authorisation</b>	A letter from an individual who requires the Requester to submit a request on their behalf in terms of PAIA. The letter must state that the individual authorises the Requester (and other representatives from the Requester's organisation, if necessary) to submit a request to access information in terms of PAIA on their behalf.
<b>Notice</b>	A notice in writing, and "notify" and "notified" have corresponding meanings.

<b>Person</b>	A natural person or a juristic person
<b>Personal Information</b>	<p>For purposes of this Manual, Personal Information shall be information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• information relating to the education or the medical, financial, criminal or employment history of the Person;</li> <li>• any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the Person;</li> <li>• the Biometric Information of the Person;</li> <li>• the personal opinions, views or preferences of the Person, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;</li> <li>• 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;</li> <li>• the views or opinions of another individual about the Person; and</li> <li>• 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.</li> </ul> <p>If the request is made in terms of PAIA, it may include the information of a deceased person, but excludes information about a person who has been dead for more than 20 years.</p>
<b>Personal Requester<sup>9</sup></b>	A Requester seeking access to a Record containing Personal Information about the Requester.
<b>Process/ Processing</b>	<p>Includes:</p> <ul style="list-style-type: none"> <li>• the collection, receipt, recording, organisation, collation, Storage, updating or modification, Retrieval, alteration, consultation or use;</li> <li>• dissemination by means of Transmission, distribution or making available in any other form; or</li> <li>• merging, linking, as well as restriction, degradation, erasure or Destruction of information.</li> </ul> <p>(This includes deleting or editing documents, saving documents to a USB, transferring documents from one device to another, etc. Processing covers all the different ways in which inlexso handles Personal Information in both physical and electronic format and applies to all Personal Information regardless of what form</p>

<sup>9</sup> Definition of “personal requester” will be omitted by s. 110 of Act 4/2013 w.e.f. a date to be proclaimed by the President by proclamation in the Gazette.

	it is in. (Paper, Emails, Electronic files, information obtained from the inlexso website, Audio recordings, video recordings, Whatsapp, Signal, Telegram, etc.)
<b>Record(s)</b>	Any recorded information regardless of the form, including, for example, written documents, video materials etc. A record requested from inlexso refers to a record that is in inlexso's possession regardless of whether inlexso created the record.
<b>Request Fee</b>	The fee that must be paid by the Requester before a request can be processed
<b>Requester</b>	The natural or juristic person requesting access to information. A requester also refers to the person making a request on behalf of somebody else
<b>Retrieving or Retrieval</b>	The tracing and recovery of specific Personal Information from stored data.
<b>Special Personal Information</b>	<p>This relates to</p> <ul style="list-style-type: none"> <li>• religious or philosophical beliefs,</li> <li>• race or ethnic origin,</li> <li>• trade union membership,</li> <li>• political persuasion,</li> <li>• health or sex life or biometric information.</li> <li>• information relating to the alleged commission of any offence or any proceedings in respect of any offence allegedly committed and the outcome of such proceedings; or</li> <li>• Personal Information of a child</li> </ul>
<b>Storage</b>	The action or method of storing Personal Information for future use, the retention of retrievable data on a computer or other electronic system
<b>Third Party</b>	Any natural or juristic person who is not the Requester of the information, nor the body to whom the information request is made.
<b>Transmission</b>	The process of passing Personal Information from one person or place to another

**ANNEXURE 1: INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER APPOINTMENT LETTERS**

**Letter of Appointment: Information Officer**

I, Clifford Anthony MacGregor, hereby authorise Petronella Kotzé as the Information Officer of inlexso Proprietary Limited, and authorise you to exercise any of the powers, duties and responsibilities conferred or imposed on me by the Protection of Personal Information Act, 2013 (POPIA) and the Promotion of Access to Information Act, 2000(PAIA)

Please be advised that I reserve my right to exercise any of the powers, duties and responsibilities conferred herein, as well as the right to amend and/or withdraw any of those powers, duties and responsibilities.

As the Information Officer you are entrusted with the following responsibilities:

- the encouragement of compliance with the conditions for the lawful Processing of Personal Information;
- dealing with requests and complaints made to inlexso pursuant to POPIA and PAIA;
- working with the Information Regulator in relation to investigations conducted;
- otherwise ensuring compliance by inlexso with the provisions of POPIA and PAIA; and

Ensuring that:

- a compliance framework for information management is developed, implemented, monitored and maintained;
- a Personal Information Impact Assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of Personal Information;
- POPIA Audits are scheduled and conducted on a regular basis;
- inlexso makes it convenient for Data Subjects who want to update their Personal Information or submit POPIA related complaints to inlexso, to do so;
- A manual is developed, monitored, maintained and made available as prescribed in section 51 of PAIA;
- internal measures are developed together with adequate systems to process requests for information or access thereto;
- internal awareness sessions are conducted regarding the provisions of POPIA and PAIA and their respective regulations, applicable codes of conduct, or information obtained from the Information Regulator;

- a copy of the Manual is provided to a Requester upon the payment of the fee as set out in Annexure 3 of this Manual;
- inlexso furnish annually, if so required, to the Regulator information about requests for access to Records of inlexso;
- in the case of health Records, if you are of the opinion that the disclosure of the Record to the Relevant Person would be likely to cause serious harm to their physical or mental health, or well-being, you may only give access to the Record if the Requester proves to your satisfaction that adequate provision is made for such counselling or arrangements as are reasonably practicable before, during or after the disclosure of the Record to limit, alleviate or avoid such harm to the Relevant Person;
- in order to render inlexso as accessible as reasonably possible, designate, in writing, one or more Deputy Information Officers as are necessary, depending on the current structure and size of inlexso;
- both you and the Deputy Information Officer(s) are registered with the Information Regulator;
- subject to legislation and policies governing the employment of personnel of inlexso, delegate any power or duty conferred or imposed on you to a Deputy Information Officer of inlexso; any power, duties and responsibilities delegated to a Deputy Information Officer should be exercised or performed subject to such conditions as you may consider necessary. Any conditions of delegation, as conferred on the Deputy Information Officer, should ensure that inlexso is as accessible as reasonably possible for Data Subjects or Requesters;
- you must reserve your rights in the aforesaid delegation to –
  - exercise the powers or to perform the duties and responsibilities concerned yourself; and
  - withdraw or amend the aforesaid delegation at any time;
- any right or privilege acquired or any obligation or liability incurred as a result of a delegation of any powers, duties and responsibilities will not be affected by any subsequent withdrawal or amendment of the decision to delegate;
- depending on the circumstances of the case, the obligation or liability incurred as a result of any delegation of any powers, duties and responsibilities will be imposed on either yourself or inlexso in so far as POPIA is concerned;
- despite the abovementioned delegation of a Deputy Information Officer, you retain the accountability and responsibility for the functions delegated to the Deputy Information Officer(s); and
- you and the Deputy Information Officer(s) receive appropriate training and keep abreast of the latest developments in POPIA and PAIA.

The delegation of any powers or duties and responsibilities to a Deputy Information Officer does not prohibit you from exercising the powers or performing the duty that you have delegated to a Deputy Information Officer(s).

Signed by:

Information Officer	
<b>Name &amp; Surname</b>	Petronella Kotzé
<b>Signature</b>	<i>L Kotzé</i>
<b>Date</b>	1 July 2021

Duly appointment by:

<b>Name &amp; Surname</b>	Clifford Anthony MacGregor
<b>Position</b>	Managing Executive
<b>Signature</b>	
<b>Date</b>	1 July 2021

**Designation and Delegation of Authority to the Deputy Information Officer**

*(In terms of section 56 of the Protection of Personal Information Act, 2013(POPIA) and Section 17(1) of the Promotion of Access to Information Act, 2000(PAIA)*

I, the undersigned, **Petronella Kotzé** hereby designate **Thapelo David Mbita** as a Deputy Information Officer of inlexso Proprietary Limited.

Furthermore, I hereby delegate to you the following powers, duties and responsibilities, as conferred or imposed on me by POPIA and PAIA-

- the encouragement of compliance with the conditions for the lawful Processing of Personal Information;
- dealing with requests made to inlexso pursuant to POPIA and PAIA;
- ensuring compliance by inlexso with the provisions of POPIA and PAIA;
- implement, monitor and maintain the compliance framework for information;
- assist with the ongoing Personal Information Impact Assessments to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of Personal Information;
- POPIA Audits are conducted on a regular basis;
- ensure that inlexso makes it convenient for Data Subjects who want to update their Personal Information or submit POPIA related complaints to inlexso, to do so;
- monitor, maintain and make available the Access to and Protection of Information Manual as prescribed in section 51 of PAIA;
- develop internal measures, together with adequate systems to process requests for information or access thereto;
- conduct internal awareness sessions regarding the provisions of POPIA and PAIA and their respective regulations, applicable codes of conduct, or information obtained from the Information Regulator;
- provide a copy of the Access to and Protection of Information Manual to a Requester upon the payment of the fee as set out in Annexure 3 of this Manual;
- attend appropriate training and keep abreast of the latest developments in POPIA and PAIA.

Please be advised that I reserve the right to exercise any of the powers, duties and responsibilities conferred herein, as well as the right to amend and/or withdraw any of those powers, duties and responsibilities.

Information Officer	
Name & Surname	Petronella Kotzé
Signature	
Date	1 July 2021

By my signature herein below, I hereby accept the delegation and designation as the Deputy Information Officer.

Deputy Information Officer	
Name & Surname	Thapelo David Mbita
Signature	1 July 2021
Date	

**ANNEXURE 2: ACCESS REQUEST FORM**

**Request for Access to a Record of inlexso**

(Section 53(1) of the Promotion of Access to Information Act 2 of 2000)

**a) Particulars of inlexso**

The Information Officer/ Deputy Information Officer  
inlexso Proprietary Limited  
Building 3, Summit Place, 221 Garsfontein Road, Menlyn, Pretoria  
P.O Box 76391, Lynnwood Ridge, Pretoria, 0040  
Tel: +27 12 942 5555  
Fax: +27 86 265 7392  
E-mail: compliance@inlexso.co.za

**b) Particulars of person requesting access to the Record**

- (a) The particulars of the person who requests access to the record must be recorded below.
- (b) Furnish an address and/or fax number in the Republic to which information must be sent.
- (c) Proof of the capacity in which the request is made (Letter of Authorisation), if applicable, must be attached.

<b>Full Names and Surname</b>	
<b>Identity Number/ Passport Number</b>	
<b>Postal Address</b>	
<b>Fax Number</b>	
<b>Telephone number</b>	
<b>E-mail Address</b>	
<b>Capacity in which request is made, when made on behalf of another person:</b>	

**c) Particulars of person on whose behalf request is made**

This section must be completed only if a request for information is made on behalf of another person.

<b>Full Names and Surname</b>	
<b>Identity Number/ Passport Number</b>	

**d) Particulars of Record**

- (a) Provide full particulars of the Record to which access is requested, including the reference number if that is known to you, to enable the Record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio (page) and attach it to this form. The Requester must sign all the additional folios.

Description of Record or relevant part of the record:	
Reference Number, if available:	
Any further particulars of record:	

**e) Fees**

- A request for access to a Record, other than a Record containing Personal Information about yourself, will be processed only after a Request Fee of R50.00 has been paid.
- A fee will be payable for access to a Record and it shall depend on the form in which access is required and the reasonable time required to search for and prepare a Record.
- A deposit that has been paid in respect of a request for access which is refused, will be repaid to the Requester.
- A Requester may lodge an application with a court against the tender/payment of the Request Fee and/or deposit.
- A Requester whose request for access to a Record has been granted, must pay an Access Fee for reproduction and for search and preparation for any time reasonably required in excess of six hours to search for and prepare (*including making any arrangements contemplated in section 29(2)(a) and (b)(i) and (ii)(aa)*) of PAIA the Record for disclosure.
- Records may be withheld until the fees have been paid.

- Fees are payable in cash or by electronic payment. Please that prior arrangement must be made for electronic payments. Contact the Deputy Information Officer on 012 942 5555 or [compliance@inlexso.co.za](mailto:compliance@inlexso.co.za).

\*If the Requester qualifies for an exemption of the payment of fees, he/ she must complete the section below

**Reason for exemption from payment of fees:**

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**f) Form of access to Record**

\*If access is granted to a Record, but you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the Record is required.

<b>Disability</b>	
<b>Form in which Record is required</b>	

\*Mark the appropriate box with an **X** to indicate the form of Record you require.

Please note the following:

- Compliance with your request in the specified form may depend on form in which the Record is available.
- Access in the form requested may be refused in certain circumstances. In such case you will be informed if access will be granted in another form.
- The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

<b>1. If the Record is in written or printed form</b>			
	Copy or Record*		Inspection of Record
<b>2. If the Record consists of visual images</b> <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc).</i>			
	View the images	Copy of the images*	Transcription of the images*
<b>3. If Record consists of recorded words or information which can be reproduced in sound:</b>			
	Listen to the soundtrack (audio cassette)		Transcription of the soundtrack* (written or printed document)

4. If record is held on computer or in an electronic or machine – readable form:					
	Printed copy of the record*		Printed copy of derived from the record*		Copy in computer readable form* (stiffy or compact disc)
* If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? <b>A postal fee is payable.</b>				YES	NO

**g) Particulars of right to be exercised or protected**

\*In terms of section 53(2)(d) of PAIA, a request for access must at least require the Requester concerned to identify the right the Requester is seeking to exercise or protect and provide an explanation of why the requested Record is required for the exercise or protection of that right.

*If the space provided is inadequate, please continue on a separate folio and attach it to this form. **The Requester must sign all the additional folios.***

**Which right is to be exercised or protected?**


**Explain why the requested Record is required for the exercising or protection of the abovementioned right?**


**h) Notice of Decision Regarding Request for Access**

Please note that you will be Notified in writing whether your request has been approved/ declined. If you prefer another method of Notification, kindly complete the section below with sufficient details and specify the manner and the necessary particulars below to enable compliance with your request.

**How would you prefer to be informed of the decision regarding your request for access to the record?**



Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature of Requester/  
Person on whose behalf  
request is made

**ANNEXURE 3: PRESCRIBED FEES**

	<b>Reproduction Costs and Access Fees</b>	<b>Fee (Rand)</b>
1.	Photocopy of an A4-size page or part thereof <i>(This applies to Records as well as a copy of this Manual)</i>	R1.10 per page
2.	Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75 per page
3.	A copy of, in a computer readable form on- <ul style="list-style-type: none"> <li>• Stiffy disc</li> <li>• Compact disc</li> </ul>	R7.50 R70.00
4.	Transcription of visual images on an A4-size page or part thereof	R40.00 per page
5.	Copy of visual images	R60.00
6.	Transcription of an audio Record on an A4-size page or part thereof	R20.00
7.	Copy of an audio Record	R30.00
<b>Request Fees</b>		
1.	The Request Fee payable by a Requester for access to a Record of inlexso, other than a Personal Requester, is R50,00.	
<b>Additional Access fee to search for and prepare Records for disclosure</b>		
1.	To search for and prepare the Record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	

**ANNEXURE 4: OBJECTION TO PROCESSING OF PERSONAL INFORMATION**

<p><b>Please submit the completed form to the Information Officer/ Deputy Information Officer:</b>  <a href="mailto:compliance@inlexso.co.za">compliance@inlexso.co.za</a></p>	
<b>Details of Data Subject</b>	
Name & Surname	
Identity Number	
Residential Address	
Contact Number	
Email Address	
<b>Details Responsible Party</b>	
Registered name of responsible party:	
Residential, postal or business address:	
Contact number(s):	
Fax number/ E-mail address:	
<b>Reasons for Objection in Terms of Section 11(1)(d) to (f) of POPIA</b> <i>(Please provide detailed reasons for the object)</i>	
<b>Signature of Data Subject</b>	
Signed on	
Signature	
<p><b>Please Note:</b></p> <ol style="list-style-type: none"> <li>1. The Information Officer/ Deputy Information Officer may require you to provide an affidavits or other documentary evidence as applicable in support of the objection prior to processing your request.</li> <li>2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.</li> <li>3. Complete as is applicable.</li> </ol>	

**ANNEXURE 5: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION**

**Please Note:**

1. The Information Officer/ Deputy Information Officer may require you to provide an affidavits or other documentary evidence as applicable in support of the objection prior to processing your request.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

<b>Mark the appropriate box with an "x".</b>	
<b>Request for:</b>	
	Correction or deletion of the Personal Information about the data subject which is in possession or under the control of the responsible party
	Destroying or deletion of a Record of Personal Information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the Record of information

<b>Please submit the completed form to the Information Officer/ Deputy Information Officer: <a href="mailto:compliance@inlexso.co.za">compliance@inlexso.co.za</a></b>	
<b>Details of Data Subject</b>	
Name & Surname	
Identity Number	
Residential Address	
Contact Number	
Email Address	
<b>Details Responsible Party</b>	
Registered name of responsible party:	
Residential, postal or business address:	
Contact number(s):	
Fax number/ E-mail address:	
<b>Information to be Corrected/ Deleted/ Destroyed/ Destroyed</b>	

**Reasons for Correction or Deletion of the Personal Information about the Data Subject in terms of Section 24(1)(a) of POPIA which is in Possession or Under the Control of the Responsible Party; and or**

**Reasons for Destruction or Deletion of a Record of Personal Information about the Data Subject in terms of Section 24(1)(b) of POPIA which the Responsible Party is no Longer Authorised to Retain.**


Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
Signature of the Data Subject



Signed with Impression - Chain of Custody



*Signature Request*

Signature Request ID:	8a613f58-bed5-4b74-ab8b-76686200cc30	Timestamp:	2021-06-30T23:16:05.529Z
Signee Name:	Lanel Kotze	Sender Name:	Lanel Kotze
Request Type:	WebSigning	Request Status:	WEBVIEWER SIGNED

*Original Document*

Document Name:	inlexso Access to and Protection of Information Manual 01072021 Final.pdf	Document Size:	579.8 KB
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*Email Evidence*

Signee Email:	lanel.kotze@eoh.com	Email Subject:	Not available in Silent Mode
Email Sent Timestamp:	Not available in Silent Mode	Email Opened Timestamp:	Not available in Silent Mode

*Web Evidence*

Signee IP Address:	197.89.62.33	Request Timestamp:	2021-06-30T23:13:38.689783
Signee GPS (if shared):	ZA: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/91.0.4472.124 Safari/537.36	Terms Accepted Timestamp:	2021-06-30T23:14:02.921656

*Annotations and Modifications*

Signature Count:	2	Form Fields Filled Count:	0
Text Annotation Count:	5	Initial All Pages Count:	0
Single Initial Count:	0		

*Signing Evidence*

Signee Mobile:	+27726999113	Sign Type:	WebSigning
Security Challenge:	NONE	Part of Workflow:	5e0a2843-710b-4107-b08b-f73d57cd39e1

*Chain Of Custody Generation*

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Signed with Impression - Chain of Custody



**Signature Request**

Signature Request ID:	c6696b0e-7710-412a-96fb-c37b0b2e4574	Timestamp:	2021-07-01T04:37:28.420Z
Signee Name:	Thapelo Mbita	Sender Name:	Lanel Kotze
Request Type:	WebSigning	Request Status:	WEBVIEWER SIGNED

**Original Document**

Document Name:	inlexso Access to and Protection of Information Manual 01072021 Final.pdf	Document Size:	859.9 KB
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**Email Evidence**

Signee Email:	thapelo.mbita@inlexso.co.za	Email Subject:	A document from Lanel Kotze is ready for signature
Email Sent Timestamp:	2021-06-30T23:13:39.356054	Email Opened Timestamp:	2021-07-01T04:35:19.300924

**Web Evidence**

Signee IP Address:	102.252.67.213	Request Timestamp:	2021-07-01T04:35:43.485310
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**Annotations and Modifications**

Signature Count:	1	Form Fields Filled Count:	0
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Single Initial Count:	0		

**Signing Evidence**

Signee Mobile:	+27635846801	Sign Type:	WebSigning
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**Chain Of Custody Generation**

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Signed with Impression - Chain of Custody



**Signature Request**

Signature Request ID:	efc5eba6-d27c-48a1-93c9-b2ba746edf9b	Timestamp:	2021-07-01T06:14:34.602Z
Signee Name:	Cliff Macgregor	Sender Name:	Lanel Kotze
Request Type:	WebSigning	Request Status:	WEBVIEWER SIGNED

**Original Document**

Document Name:	inlexso Access to and Protection of Information Manual 01072021 Final.pdf	Document Size:	911.0 KB
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**Email Evidence**

Signee Email:	cliff.macgregor@inlexso.co.za	Email Subject:	A document from Lanel Kotze is ready for signature
Email Sent Timestamp:	2021-06-30T23:13:35.501709	Email Opened Timestamp:	Not available in Silent Mode

**Web Evidence**

Signee IP Address:	105.187.41.14	Request Timestamp:	2021-07-01T06:13:30.461922
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**Annotations and Modifications**

Signature Count:	1	Form Fields Filled Count:	0
Text Annotation Count:	0	Initial All Pages Count:	0
Single Initial Count:	0		

**Signing Evidence**

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**Chain Of Custody Generation**

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