

PAIA & POPIA MANUAL

Access to Information and Protection of Personal Information Manual
prepared in terms of

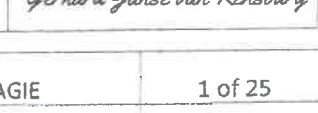
- Promotion of Access to Information Act 2 of 2000 (PAIA)
- Protection of Personal Information Act 4 of 2013 (POPIA)
(as amended)

TELEMA HOLDINGS SA (PTY) LTD AND CONTROLLED COMPANIES

including:

- Penbro Kelnick (Pty) Ltd
- Penbro Consulting Engineering (Pty) Ltd
 - Strike Tech (Pty) Ltd
- Strike Consulting Electronics (Pty) Ltd

DOCUMENT APPROVAL

AUTHORISED	NAME & SURNAME	SIGNATURE
GROUP DIRECTOR	Felice Massaro	
GROUP INFORMATION OFFICER	Deonette Visagie	
GROUP DEPUTY INFORMATION OFFICER	Willem Fourie	
GROUP DEPUTY INFORMATION OFFICER	Gerhard Jansen van Rensburg	

TELSA_PAIA	2026/05/25	2	D.VISAGIE	1 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

TABLE OF CONTENTS

1. FORWARD.....	3
2. INTRODUCTION	3
3. DEFENITION AND ACRONYMS.....	4
4. PURPOSE OF THIS MANUAL	4
5. COMPANY DETAILS	54
6. INFORMATION OFFICER DETAILS.....	5
7. INFORMATION REGULATOR CONTACT DETAILS	6
8. GUIDE ON HOW TO USE PAIA.....	6
9. PROCESSING OF PERSONAL INFORMATION.....	6
10. CATEGORIES OF DATA SUBJECTS	6
11. CATEGORIES OF PERSONAL INFORMATION.....	7
12. PURPOSE OF PROCESSING	7
13. RECIPIENTS OF INFORMATION.....	7
14. CROSS-BORDER TRANSFERS.....	8
15. SECURITY MEASURES	8
16. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION.....	8
17. RECORDS HELD IN ACCORDANCE WITH OTHER SOUTH AFRICAN LEGISLATION	8
18. ACCESS TO RECORDS HELD BY TELEMA(SA) AND CONTROLLED COMPANIES	9
19. POPIA PERSONAL INFORMATION PROCESSING FRAMEWORK.....	11
20. REQUEST PROCEDURE	12
21. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS	13
22. PROTECTION OF RESEARCH INFORMATION. REMEDIES AVAILABLE	14
23. AVAILIBILITY OF THE MANUAL.....	14
24. UPDATING OF MANUAL.....	14
25. APPROVAL.....	15
26. APPLICABLE COMPLIANCE ANNEXURES	15-25

TELSA_PAIA	2026/05/25	2	D.VISAGIE	2 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

TABLE OF CONTENTS

1. FORWARD	3
2. INTRODUCTION	3
3. DEFENITION AND ACRONYMS.....	4
4. PURPOSE OF THIS MANUAL	4
5. COMPANY DETAILS	54
6. INFORMATION OFFICER DETAILS.....	5
7. INFORMATION REGULATOR CONTACT DETAILS	6
8. GUIDE ON HOW TO USE PAIA.....	6
9. PROCESSING OF PERSONAL INFORMATION	6
10. CATEGORIES OF DATA SUBJECTS	6
11. CATEGORIES OF PERSONAL INFORMATION.....	7
12. PURPOSE OF PROCESSING	7
13. RECIPIENTS OF INFORMATION.....	7
14. CROSS-BORDER TRANSFERS.....	8
15. SECURITY MEASURES	8
16. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION.....	8
17. RECORDS HELD IN ACCORDANCE WITH OTHER SOUTH AFRICAN LEGISLATION	8
18. ACCESS TO RECORDS HELD BY TELEMA(SA) AND CONTROLLED COMPANIES	9
19. POPIA PERSONAL INFORMATION PROCESSING FRAMEWORK.....	11
20. REQUEST PROCEDURE	12
21. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS	13
22. PROTECTION OF RESEARCH INFORMATION. REMEDIES AVAILABLE	14
23. AVAILABILITY OF THE MANUAL.....	14
24. UPDATING OF MANUAL.....	14
25. APPROVAL.....	15
26. APPLICABLE COMPLIANCE ANNEXURES	15-25

TELSA_PAIA	2026/05/25	2	D.VISAGIE	2 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

1. FORWARD

Telema SA, refers to Telema Holding South Africa Limited and its subsidiaries, affiliates, parent companies and any of their respective controlled companies and related businesses, registered in the Republic of South Africa as listed below:

- Penbro Kelnick (Pty) Ltd
- Penbro Consulting Engineering (Pty) Ltd
- Strike Tech (Pty) Ltd
- Strike Electronics Consulting (Pty) Ltd

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

The scope of this manual is limited to the records held by Telema Holding South Africa and its subsidiaries registered in South Africa.

2. INTRODUCTION

This Manual is compiled in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and incorporates the relevant information processing requirements contemplated by the Protection of Personal Information Act 4 of 2013 ("POPIA").

This Manual applies to:

- Telema Holding SA Pty Ltd
- Penbro Kelnick (Pty) Ltd
- Penbro Consulting Engineering (Pty) Ltd
- Strike Technologies (Pty) Ltd
- Strike Consulting Electronics (Pty) Ltd

The Manual applies to all:

- Directors
- Employees
- Contractors
- Consultants
- Temporary employees
- Learners
- Customers
- Suppliers
- Service providers
- Visitors

TELSA_PAIA	2026/05/25	2	D.VISAGIE	3 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

3. DEFINITIONS AND ACRONYMS PAIA – Promotion of Access to Information Act No. 2 of 2000

- BCEA Basic Conditions of Employment Act
- CEO Chief Executive Officer
- DIO Deputy Information Officer
- EEA Employment Equity Act
- HR Human Resources
- IO Information Officer
- PAIA Promotion of Access to Information Act 2 of 2000
- POPIA Protection of Personal Information Act 4 of 2013
- Regulator Information Regulator
- SHEQ Safety, Health, Environment and Quality
- Data Subject Person to whom personal information relates
- Operator Person processing information on behalf of a responsible party
- Responsible Party Entity determining purpose and means of processing

4. PURPOSE OF THIS MANUAL

This Manual is prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 and incorporates the applicable requirements of the Protection of Personal Information Act, 2013.

The purpose of this Manual is to:

- Facilitate requests for access to records held by the Group and its subsidiaries;
- Promote transparency, accountability and effective governance;
- Inform data subjects of their rights regarding personal information;
- Describe the categories of personal information processed by the Group;
- Explain the way personal information is collected, used, stored, disclosed and protected;
- Provide details regarding the procedures for requesting access to records and exercising data subject rights.

This Manual applies to all companies within the Group and all employees, contractors, operators, suppliers and other stakeholders who process information on behalf of the Group.

Copyright Notice

This Manual remains the property of Telema Holding SA and its controlled companies and may be reproduced only for lawful compliance, regulatory, audit and information access purposes.

TELSA_PAIA	2026/05/25	2	D.VISAGIE	4 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

5. COMPANY DETAILS

Company	REGISTRATION NUMBER
Telema Holdings SA (Pty) Ltd	2018 / 550599 / 07
Penbro Kelnick (Pty) Ltd	2014 / 203632 / 07
Penbro Engineering Consulting (Pty) Ltd	2020 / 146921 / 07
Strike Tech (Pty) Ltd	2018 / 603719 / 07
Strike Consulting Electronics (Pty) Ltd	2020 / 146972 / 07
Main business activities	Electrical & Electronic Engineering, Design and Manufacturing
PHYSICAL ADDRESS	POSTAL ADDRESS
Hermanstad Industrial Park, Unit 5	PO Box 35156
Moot Street	Menlo Park
Hermanstad, Pretoria West	0102
0082	Pretoria
Telephone:	012 719 9065
Website:	www.penbro.co.za
Email:	info@penbro.co.za

6. INFORMATION OFFICER DETAILS

The responsibility for administration of, and compliance with POPIA and PAIA, has been appointed by the Director of Telema Holding SA (Pty) Ltd, and is responsible for ensuring compliance with PAIA and POPIA. Requests pursuant to the provisions of these Acts should be directed as follows:

6.1. Information Officer

- Name: Deonette Visagie
- Tel: 012 719 9065
- Email: deonette@penbro.co.za
- HR Manager

6.2. Deputy Information Officer 1

- Name: Willem Fourie
- Tel: 012 719 9065
- Email: willem@penbro.co.za
- Financial Manager

6.3. Deputy Information Officer 2

- Name: Gerhard Jansen van Rensburg
- Tel: 012 719 9065
- Email: gerrie@penbro.co.za

TELSA_PAIA	2026/05/25	2	D.VISAGIE	5 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

- Industrial Relations Officer

7. INFORMATION REGULATOR CONTACT DETAILS

PHYSICAL ADDRESS	POSTAL ADDRESS
JD House 27 Stiemens Street Braamfontein Johannesburg 2001	P.O. Box 31533 Braamfontein Johannesburg 2017
General Enquiries:	010 023 5200
Email:	enquiries@inforegulator.org.za
Complaints:	PAIAComplaints@inforegulator.org.za
Website:	www.inforegulator.org.za

8. GUIDE ON HOW TO USE PAIA

8.1. THE INFORMATION REGULATOR ([HTTPS://INFOREGULATOR.ORG.ZA/PAIA-GUIDELINES/](https://inforegulator.org.za/paia-guidelines/)) HAS COMPILED A GUIDE IN TERMS OF SECTION 10 OF PAIA.

8.2. THE GUIDE EXPLAINS:

- THE OBJECTIVES OF PAIA;
- HOW TO REQUEST INFORMATION;
- APPLICABLE FEES;
- REMEDIES AVAILABLE WHERE ACCESS IS REFUSED.

8.3. COPIES MAY BE OBTAINED FROM THE INFORMATION REGULATOR.

9. PROCESSING OF PERSONAL INFORMATION

The Company processes personal information in accordance with POPIA.

10. CATEGORIES OF DATA SUBJECTS

- SHAREHOLDERS
- Directors
- Employees
- Job applicants
- Clients
- Suppliers
- Contractors
- Visitors

TELSA_PAIA	2026/05/25	2	D.VISAGIE	6 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

11. CATEGORIES OF PERSONAL INFORMATION

- Identity information
- Contact information
- Employment information
- Financial information
- Educational information
- Medical information where required by law
- Security and access control information

12. PURPOSE OF PROCESSING

- Employment administration
- Payroll
- Recruitment
- Skills development
- Contract management
- Procurement
- Health and safety compliance
- Customer relationship management
- Legal and regulatory compliance

13. RECIPIENT OF INFORMATION

PERSONAL INFORMATION MAY BE SHARED WITH:

- Government departments
- SARS
- UIF
- Bargaining councils
- Medical aid administrators
- Pension and provident fund administrators
- Auditors
- Legal advisers
- Training providers
- Clients where contractually required

TELSA_PAIA	2026/05/25	2	D.VISAGIE	7 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

14. CROSS-BORDER TRANSFERS

Personal information may be transferred outside South Africa where required for operational, contractual, legal or technological purposes and appropriate safeguards are implemented.

15. SECURITY MEASURES

The company maintains reasonable technical and organisational safeguards to protect personal information against:

- Loss
- Unauthorised access
- Disclosure
- Destruction
- Misuse

16. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION ((SECTION 51 (1) (B) (III) OF PAIA)

TELEMA HOLDING SA holds records in accordance with the following legislation

- 16.1. We keep records in terms of the legislation listed in paragraph and we may make these records available for inspection to a requester if:
- 16.2. The requester is entitled to such access in terms of PAIA or POPIA and such access is not prohibited by any other applicable law, codes of conduct, rules or regulations; and
- 16.3. A request for access to such information is made in terms of PAIA.

17. RECORDS HELD IN ACCORDANCE WITH OTHER SOUTH AFRICAN LEGISLATION (SECTION 51(1)(B)(III))

- COMPANIES ACT 71 OF 2008
- LABOUR RELATIONS ACT 66 OF 1995
- BASIC CONDITIONS OF EMPLOYMENT ACT 75 OF 1997
- EMPLOYMENT EQUITY ACT 55 OF 1998
- SKILLS DEVELOPMENT ACT 97 OF 1998
- SKILLS DEVELOPMENT LEVIES ACT 9 OF 1999

TELSA_PAIA	2026/05/25	2	D.VISAGIE	8 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

- OCCUPATIONAL HEALTH AND SAFETY ACT 85 OF 1993
- COMPENSATION FOR OCCUPATIONAL INJURIES AND DISEASES ACT 130 OF 1993
- UNEMPLOYMENT INSURANCE ACT 63 OF 2001
- UIF CONTRIBUTIONS ACT 4 OF 2002
- INCOME TAX ACT 58 OF 1962
- TAX ADMINISTRATION ACT 28 OF 2011
- VAT ACT 89 OF 1991
- ELECTRONIC COMMUNICATIONS AND TRANSACTIONS ACT 25 OF 2002
- POPIA
- PAIA
- NATIONAL QUALIFICATIONS FRAMEWORK ACT 67 OF 2008
- EMPLOYMENT SERVICES ACT 4 OF 2014
- PENSION FUNDS ACT 24 OF 1956

18. ACCESS TO RECORDS HELD BY TELEMA(SA) AND CONTROLLED COMPANIES

18.1 Records AUTOMATICALLY AVAILABLE without a formal Request. *These records may be available on Penbro Kelnick (Pty) Ltd and Strike Technologies (Pty) Ltd websites and a person may download or request telephonically or by sending an email or a letter.*

- Promotional Material
- Product Brochures
- Marketing material
- Website content
- Published policies
- Employment opportunities
- Publicly available compliance certificates
- Publicly available company information

18.2 DESCRIPTION RECORDS HELD BY SUBJECT AND CATEGORY (SECTION 51(1)(B)(IV))

18.2.1 Corporate Records

- Registration documents
- Shareholder records
- Board resolutions
- Corporate governance records
- Statutory registers

TELSA_PAIA	2026/05/25	2	D.VISAGIE	9 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

18.2.2 Financial Records

- Annual Financial Statements
- Tax records
- VAT records
- Banking records
- Asset registers
- Accounting records

18.2.3 Human Resources Records

- Employment contracts
- Personnel files
- Leave records
- Payroll records
- Training and assessment records
- Disciplinary and Performance records
- Unemployment insurance
- HR policies and procedures.
- Employment equity records

18.2.4 Health and Safety Records

- Risk assessments
- Incident reports
- Medical surveillance records
- Safety committee records
- Workplace inspection and accident investigation reports.
- Equipment inspections, repairs, and maintenance.
- Written health and safety procedures, plans, and codes of practice.
- Results of functional tests and calibrations of instruments.
- Employee induction and training with the date(s), names, description, and expiry date(s).
- Sampling and monitoring results from exposure testing.
- First aid records and injury reports.

18.2.5 Skills Development Records

- Workplace Skills Plans
- Annual Training Reports
- Learnership records
- Training registers

TELSA_PAIA	2026/05/25	2	D.VISAGIE	10 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

18.2.6 Technical and Engineering Records

- Drawings
- Specifications
- Manufacturing records
- Project documentation
- Quality records

18.2.7 Information Technology Records

- Software licences
- Access logs
- Asset registers
- Backup records

18.2.8 Client Records

- Contracts
- Quotations
- Proposals
- Correspondence
- Technical reports

18.2.9 Supplier Records

- Supplier agreements
- Quotations
- Invoices
- Compliance documentation
- Compliance documentation

19. POPIA PERSONAL INFORMATION PROCESSING FRAMEWORK (SECTION 51(1)(C))

19.1. Purpose of Processing Personal Information

The Group collects and processes data strictly to execute engineering contracts, process payroll, comply with safety laws, and perform essential business functions

19.2. Categories of Data Subject and Information Held

TELSA_PAIA	2026/05/25	2	D.VISAGIE	11 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

Data Subjects	Categories of Personal Information Processed
Employees / Candidates	ID numbers, bank numbers, medical health certificates, physical addresses.
Clients & Entities	Company registration details, VAT tags, corporate financial lines.
Suppliers & Vendors	Banking details, BEE status credentials, trade reference profiles.
On-site Visitors	Names, vehicle license registrations, access control CCTV footage.

19.3. Planned Cross-Border Transfers of Data

No personal data is intentionally transferred outside of South Africa unless secure cloud storage backups reside on regional servers with equivalent data privacy protocols.

19.4. Information Security Measures implemented

- Firewalls, active anti-malware protections, and structural access control codes.
- Mandatory employee NDA configurations and secure multi-factor authentication (MFA).
- Physical perimeter guards, video cameras, and locked technical registry rooms.

20. REQUEST PROCEDURE

20.1. HOW TO MAKE A REQUEST

To make a request, the requester must complete Form 2 prescribed under the PAIA Regulations and submit it to the Information Officer at the contact details provided above.

20.1.1. Provide sufficient details to enable Telema SA to identify:

- The record(s) requested.
- The requester (and if an agent is lodging the request), proof of authority.
- The form of access required.
- The requester's contact details.

The Information Officer will respond within 30 days of receipt of the request, subject to extensions permitted by PAIA.

20.2. FEES PAYABLE

- A requester is required to pay the prescribed fees before a request will be process.
- Prescribed request, reproduction and access fees shall be charged in accordance with the PAIA Regulations, 2021, as amended from time to time.

TELESA_PAIA	2026/05/25	2	D.VISAGIE	12 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

- Applicable fees will be communicated to the requester before access is granted.
- If the search for the requested records exceeds the prescribed hours, an additional fee will be payable.
- Records may be withheld until the prescribed fees have been paid.

20.3. PROCESSING OF REQUESTS

- Upon Receipts of a request, the Information Officer will process the request in accordance with PAIA and respond within 30 days, which may be extended under certain circumstances.
- If a request is refused, reasons for the refusal will be provided. The requester has the right to lodge an internal appeal or an application with a court against the refusal.

20.4 Regulatory Forms Checklist

Requesters wishing to invoke data privacy rights must utilize official templates downloadable from the Information Regulator Portal:

- **To request business records:** Use **PAIA Form 2** (Request for Access to Record).
- **To object to data processing:** Use **POPIA Form 1** (Objection to Processing).
- **To update or wipe historical data:** Use **POPIA Form 2** (Correction or Deletion Request).

21. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

Access to certain records may be refused on grounds stipulated in PAIA, including but not limited to:

- Protection of personal information of third parties;
- Protection of commercial information;
- Protection of confidential information;
- Protection of safety of individuals;
- Protection of legally privileged records;

TELSA_PAIA	2026/05/25	2	D.VISAGIE	13 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

22. PROTECTION OF RESEARCH INFORMATION. REMEDIES AVAILABLE

Where a request is refused:

22.1. INTERNAL APPEAL: INFORMATION REGULATOR

A REQUESTER MAY SUBMIT A COMPLAINT TO THE INFORMATION REGULATOR.

22.2. Judicial Review: Court Application

If an internal appeal is unsuccessful, the requester may apply to a competent court for appropriate relief.

23. AVAILABILITY OF THE MANUAL

23.1. This manual is available in English.

23.2. A copy of this Manual or the updated version thereof, is also available as follows:

23.2.1. On Penbro Kelnick (Pty) Ltd, <https://penbro.co.za/> and Strike Tech (Pty) Ltd, <https://strike.co.za/> websites.

23.2.2. At the head office of the public body for public inspection during normal business hours.

23.2.3. From the Information Officer upon request.

23.2.4. From the Information Regulator

23.3. 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.

24. UPDATING OF THE MANUAL

The Information Officer of Telema Holding SA (Pty) Ltd will review and update this Manual on an annual basis to ensure continued compliance with PAIA, POPIA and applicable legislation.

TELSA_PAIA	2026/05/25	2	D.VISAGIE	14 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

25. APPROVED BY:

DIRECTOR

Date: _____

INFORMATION OFFICER

Date: _____

26. APPLICABLE COMPLIANCE ANNEXURE ATTACHED:

- *Annexure A – PAIA Form 2 (Request for Access to Record)*
- *Annexure B – Current PAIA Fee Schedule*
- *Annexure C – Information Officer Appointment Letter*
- *Annexure D – POPIA Data Subject Rights Request Form*
- *Annexure E – Categories of Personal Information Processing Register*

TELSA_PAIA	2026/05/25	2	D.VISAGIE	15 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

PAIA FORM 2
REQUEST FOR ACCESS TO RECORD
(Section 53(1) of PAIA)

1. PARTICULARS OF PRIVATE BODY

Name of Private Body:	
Registration Number:	
Postal Address:	
Email Address	

2. INFORMATION OF PERSON REQUESTING ACCESS TO THE RECORD

Full Names and Surname:	
Identity Number:	
Postal Address:	
Telephone Number:	
Email Address:	
Capacity in which request is made (if on behalf of another person):	

3. PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE (IF APPLICABLE)

Full Names and Surname:	
Identity Number:	

TELSA_PAIA	2026/05/25	2	D.VISAGIE	16 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

4. DESCRIPTION OF RECORD REQUESTED

Provide full particulars of the record to which access is requested:

5. REFERENCE NUMBER (if known):

6. FORM OF ACCESS REQUIRED:

- ☐ Inspection
- ☐ Copy
- ☐ Electronic Copy
- ☐ Transcript
- ☐ Other (Specify)

7. PARTICULAR RIGHTS to be Exercised or Protected:

8. Explain why the requested record is required:

TELSA_PAIA	2026/05/25	2	D.VISAGIE	17 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

9. PREFERRED METHOD OF NOTIFICATION:

- ☐ **Email**
☐ **Post**
☐ **Telephone**

Signed at _____, on this _____ day of _____ 20____

Signature of Requester

TELSA_PAIA	2026/05/25	2	D.VISAGIE	18 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

CURRENT PAIA FEE STRUCTURE FOR PRIVATE BODIES

1. Request Fee:

- Request for access to a record: R140.00

2. Access Fees:

Photocopy of A4 page or part thereof:	R2.00 per page
Printed copy of an A4 page or part thereof from electronic records	R2.00 per page
Copy in electronic format (USB/CD or another electronic medium)	Actual cost of reproduction
Search and preparation fee:	R145.00 per hour or part thereof
Deposit (If search exceeds 6 hours)	Up to one-third of the estimated access fee
Postal/Courier charges:	Actual cost incurred

3. Exemptions:

No request fee is payable by:

- A person seeking access to records containing personal information about themselves.
- Persons exempted under applicable legislation.

Note:

Fees may be amended by the Minister from time to time. The latest prescribed fees published under PAIA shall apply.

TELSA_PAIA	2026/05/25	2	D.VISAGIE	19 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

INFORMATION OFFICER APPOINTMENT LETTER

REFER TO ATTACHED LETTER

TELSA_PAIA	2026/05/25	2	D.VISAGIE	20 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

Annexure D

DATA SUBJECT RIGHTS REQUEST FORM

1. DETAILS OF DATA SUBJECT

Full Names:	
Identity Number:	
Telephone Number:	
Email Address:	
Postal Address:	

2. REQUEST TYPE

Please select the request:

- ☐ Access to Personal Information
- ☐ Correction of Personal Information
- ☐ Deletion of Personal Information
- ☐ Objection to Processing
- ☐ Restriction of Processing
- ☐ Withdrawal of Consent
- ☐ Complaint Regarding Processing
- ☐ Other

3. Details of Request:

4. Description of Personal Information Concerned:

TELSA_PAIA	2026/05/25	2	D.VISAGIE	21 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

5. SUPPORTING DOCUMENTS ATTACHED:

- ☐ Identity Document
☐ Proof of Authority
☐ Other

6. PREFERRED RESPONSE METHOD:

- ☐ Email
☐ Post
☐ Collection

7. DECLARATION:

I declare that the information provided in this form is accurate and that I am the data subject or authorised representative.

Signature: _____

Date: _____

TELSA_PAIA	2026/05/25	2	D.VISAGIE	22 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

Annexure E

CATEGORIES OF PERSONAL INFORMATION PROCESSING REGISTER

1. CATEGORY OF DATA SUBJECT:

- ☐ Employees
- ☐ Job Applicants
- ☐ Contractors
- ☐ Suppliers
- ☐ Customers
- ☐ Visitors
- ☐ Other

2. CATEGORIES OF PERSONAL INFORMATION PROCESSED:

2.1 Employees:

- Identity Information
- Contact Details
- Employment Records
- Payroll Information
- Banking Details
- Performance Records
- Qualifications
- Training Records

2.2 Job Applicants:

- CVs
- Qualifications
- Identity Information
- Reference Checks

2.3 Customers:

- Contact Information
- Billing Information
- Contract Information

TELSA_PAIA	2026/05/25	2	D.VISAGIE	23 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

2.4 Suppliers and Contractors:

- Contact Information
- Banking Details
- Tax Information
- Company Registration Information

2.5 Special Personal Information (where applicable):

- Health information required by law
- Biometric information
- Criminal checks where legally justified

3. PURPOSE OF PROCESSING:

- Recruitment
- Employment Administration
- Payroll Processing
- Skills Development
- Supplier Management
- Customer Relationship Management
- Regulatory Compliance
- Occupational Health and Safety
- Security and Access Control

4. RECIPIENTS OF INFORMATION:

- Payroll Service Providers
- Medical Aid Administrators
- Pension/Provident Fund Administrators
- SARS
- SETAs
- Bargaining Councils
- Government Authorities where legally required

TELSA_PAIA	2026/05/25	2	D.VISAGIE	24 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

5. RETENTION PERIOD:

Information is retained in accordance with applicable legislation, contractual requirements, and the Company's Record Retention Policy.

6. CROSS-BORDER TRANSFERS:

Where applicable, personal information may be transferred subject to appropriate safeguards and compliance with POPIA.

INFORMATION OFFICER APPROVAL:

D. Visagie
Name


Signature

17/06/2026
Date

TELSA_PAIA	2026/05/25	2	D.VISAGIE	25 of 25
DOCUMENT NUMBER	PUBLISHED DATE	REVISION	CREATED BY	PAGE

BOARD RESOLUTION OF TELEMA HOLDING SA (PTY) LTD

Registration Number: 2018/550599/07

Date: 01/06/2026

APPOINTMENT AND AUTHORIZATION OF INFORMATION OFFICER IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 ("PAIA") AND THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 ("POPIA")

WHEREAS:

1. The Company is required to comply with the provisions of the Promotion of Access to Information Act 2 of 2000 ("PAIA") and the Protection of Personal Information Act 4 of 2013 ("POPIA");
2. The head of a private body is deemed to be the Information Officer of the Company;
3. The Company considers it necessary and appropriate to designate a suitably qualified employee to perform the functions and responsibilities associated with the Information Officer role;
4. The Board is satisfied that the individual identified below possesses the requisite knowledge, experience and authority to discharge the duties associated with the role.

IT IS HEREBY RESOLVED THAT:

1. The Board notes that the Chief Executive Officer/Managing Director remains the head of the private body for purposes of PAIA and POPIA.
2. Mrs Deonette Visagie
Position: Group Human Resources Manager
Identity Number: 6310060135088

Is hereby designated and authorized to perform the functions of Information Officer for and on behalf of the Holding Company and the following controlled companies:

- 2.1 Penbro Kelnick (Pty) Ltd
- 2.2 Penbro Engineering Consulting (Pty) Ltd
- 2.3 Strike Tech (Pty) Ltd
- 2.4 Strike Electronics Consulting (Pty) Ltd

3. The designated Information Officer is authorized to:
 - 3.1. Register as Information Officer with the Information Regulator;
 - 3.2. Develop, implement, maintain and monitor the Company's PAIA and POPIA compliance programme;
 - 3.3. Compile, maintain and publish the Company's PAIA Manual;
 - 3.4. Receive, assess and respond to PAIA requests for access to records;
 - 3.5. Monitor compliance with POPIA and related data protection requirements;
 - 3.6. Manage personal information incidents and data breach reporting obligations;
 - 3.7. Liaise with the Information Regulator and other regulatory authorities;
 - 3.8. Develop policies, procedures and awareness programmes relating to privacy, information security and records management;

- 3.9. Appoint and manage Deputy Information Officers where necessary and subject to the required approvals.
4. Management shall provide the Information Officer with reasonable access to resources, information, systems and personnel necessary to fulfil these responsibilities.
5. This authorization shall remain in force until revoked in writing by the Board or until the employee ceases employment with the Company.
6. The Company Human Resources Department is instructed to retain this resolution in the Company's statutory records and governance files.

CERTIFIED AS A TRUE RESOLUTION OF THE BOARD OF DIRECTORS OF TELEMA HOLDING SA (PTY) LTD.

Director:

Felice Massaro
Name


Signature

17-0-6-2026
Date