

# GRAIN SA POPI-POLICY



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POLICY IN COMPLIANCE WITH THE  
PROVISIONS OF THE PROTECTION OF  
PERSONAL INFORMATION ACT, 2013

## GRAIN SA

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## SECTION 1: DEFINITIONS AND INTERPRETATION OF THE ACT

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Throughout the course of this policy document, reference will be made to terms as contained and defined in the Protection of Personal Information Act, Act 4 of 2013 as well as any additional terms, which, are set out here for ease of reference when making use of this policy document, and as follows:-

- 1.1 **“consent”** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
- 1.2 **“data subject”** means the person to whom personal information relates. For purposes of this policy, this may refer (within context) to Grain SA Employees, working groups, Grain SA members and other stakeholders;
- 1.3 **“Filing system”** means any structured set of personal information, whether centralized, decentralized or dispersed on a functional or geographic basis which is accessible according to specific criteria;
- 1.4 **“Grain SA”** means Grain South-Africa the voluntary association of members that is administrated in terms of its constitution, a copy of which can be obtained at <https://www.grainsa.co.za/pages/about-grain-sa/our-constitution>.
- 1.5 **“Grain SA Employees”** means individuals that are employed by Grain SA on either permanent or temporary basis and who are employed at any of the divisions in the Grain SA structure;
- 1.6 **“information matching programme”** means the comparison, whether manually, or by means of any electronic or other device, of any document that contains personal information about ten or more data subjects with one or more documents that contain personal information of ten or more data subjects, for the purpose of producing or verifying information that may be used for the purpose of taking any action in regard to an identifiable data subject;
- 1.7 **“Information Officer”** shall mean the official appointed by Grain SA that must develop and enforce the provisions of this policy within Grain SA and who must report, for incidences connected to this policy, to the Information Regulator;
- 1.8 **“Information Regulator”** refers to the office of the Information Regulator, the reporting institution created in terms of Section 39 of the POPI-Act;
- 1.9 **“Members of Grain SA”** shall mean the members of Grain SA and include such members as per the categories set out in section 5 of the Constitution of Grain SA;
- 1.10 **“Operator”** means a person who processes personal information for a responsible party in terms of a contract or mandate without being under the direct authority of that party;
- 1.11 **“PAIA”** shall mean the Promotion of Access to Information Act, Act 2 of 2000 and with particular relevance used in Section 13 below;
- 1.12 **“this Policy” or “this Policy Document”** refers to this policy document and its contents;
- 1.13 **“personal information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- 1.13.1 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;
  - 1.13.2 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, location information, online identifier or other particular assignment to the person;
  - 1.13.3 the biometric information of the person;
  - 1.13.4 the personal opinions, views or preferences of the person;
  - 1.13.5 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;
  - 1.13.6 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;
- 1.14 **“POPI-Act”** shall mean the Protection of Personal Information Act, Act 4 of 2013
- 1.15 **“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, organization, 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 restriction, degradation, erasure or destruction of information;
- 1.16 **“record”** means any recorded information –
- 1.16.1 regardless of form or medium, including any of the following:-  
writing on any material; information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software for both, or other device, and any material subsequently derived from information so produced, recorded or stored; label, marking or other writing that identifies or describes any thing of which it forms part, or to which it is attached by any means;
  - 1.16.2 book, map, plan, graph or drawing;
  - 1.16.3 photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
  - 1.16.4 in the possession or under the control of a responsible party;
  - 1.16.5 whether or not it was created by a responsible party; and
  - 1.16.6 regardless of when it came into existence;
- 1.17 **“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 of processing personal information.
- 1.18 **“Working Group”** refers to the working groups as defined and developed in terms of the Constitution of Grain SA and which refer to all the qualifying producers;
- 1.19 Where any other term is defined within the context of any particular clause in this Policy Document (other than the above definitions), unless it is clear from the clause in question that the term so defined has application to the entire Policy Document, that defined term shall bear the meaning ascribed to it for the entire main parent clause wherein it is defined, including all sub-clauses thereto, and not for the entirety of this Policy Document;

- 1.20 When any number of days is prescribed in this policy, same shall be reckoned exclusively of the first and inclusively of the last day, unless the last day falls on a Saturday, Sunday or public holiday, in which case, the last day shall be the next succeeding day which is not either of these days. The term “business day” shall mean any day other than these mentioned days;
- 1.21 Any Annexures to this policy that do not themselves contain their own definitions or expressions as defined above shall bear such meaning as ascribed thereto in such annexures;
- 1.22 The use of the word “including” followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and *eiusdem generis* rule shall not be applied in the interpretation thereof;
- 1.23 This Policy document and all matters or disputes arising therefrom or incidental thereto, shall be governed and construed in accordance with the laws of the Republic of South-Africa;
- 1.24 In view of the above definitions, Grain SA:-
- 1.24.1 Is a responsible party in terms of the POPI-Act and the POPI-Act is applicable to Grain SA;
  - 1.24.2 Receives and solicits personal information as defined from data subjects during the course and scope of its activities;
  - 1.24.3 Processes the information during the course and scope of its activities;
  - 1.24.4 Records information and has records of personal information;
  - 1.24.5 Makes use of automated and filing systems and information matching programmes;
- 1.25 The broad approach of Grain SA in this policy, and which is the benchmark for the assessing of all processing of personal information, is a purpose-based justification approach. This is in compliance with Section 13(1) of the POPI-Act that states that “Personal information must be collected for a specific, explicitly defined and lawful purpose related to a function or activity of the Responsible Party;
- 1.26 During the application of the provisions of the POPI-Act, Grain SA Employees will have to ask themselves (with reference to personal information) whether:-
- 1.26.1 Is the information collected for a specific purpose?
  - 1.26.2 Is the required information sufficiently defined?
  - 1.26.3 Has the data subject been informed of the reason for the collection of the information?
  - 1.26.4 Does the information collected relate to a specific and legal function of Grain SA and its commercial activities?

- 2.1 This policy is prepared and adopted as a Policy Document as required in terms of Section 4(7) of the POPI-Act. The purpose of the POPI-Act is to safeguard personal information, regulating the manner in which same may be processed, to provide rights and remedies for transgressions of the POPI-Act and to establish measures that furthers these purposes.
- 2.2 Grain SA is committed to ensuring its own statutory compliance and protection of personal information as required by the POPI-Act. The purpose of this particular Policy is to create a standard and thorough reference to all stakeholders of Grain SA, inclusive of Grain SA employees, study groups, Grain SA members, work groups and service providers with regards to the collection, processing, storing and deletion of personal information. All other policies and procedures that are currently in place should take into account the requirements and submissions made in this document and stakeholders, particularly Grain SA employees, are required to take note of the various aspects to be considered when receiving and handling personal information.
- 2.3 For interpretive purposes, this policy will be broken down into the sections in the index portion hereof and with a short introduction into the meaning and terminology used by the POPI- Act and which will be referenced throughout this Policy Document.
- 2.4 Owing to the fact that the POPI-Act is fairly new and with little or no guidelines having been provided by the legislature regarding the format of this Policy Document or where there is no litigious jurisprudence on several aspects of the POPI-Act, Grain SA reserves the right to amend some of the aspects or terms in this policy and the latest version of this policy document will be uploaded and accessible on the website, [www.grainsa.co.za](http://www.grainsa.co.za) and be kept by the Corporate Secretariat Division of Grain SA for access and reference.
- 2.5 The provisions of this policy document will mainly be utilized by the employees and associated study groups, Grain SA members and work groups of Grain SA and give guidance on the receipt and processing of personal information. However, service providers and other stakeholders will be able to access this document to assess how Grain SA receives, processes and handles personal information and in order to provide greater transparency when transacting or collaborating with Grain SA. In preparation of this policy, a consultation process was followed with the following main divisions of Grain SA:-
  - 2.5.1 Office of the CEO;
  - 2.5.2 Marketing;
  - 2.5.3 Economy;
  - 2.5.4 Human Resources;
  - 2.5.5 Farmer Development;
  - 2.5.6 Company Secretariat;
  - 2.5.7 Finance & Corporate Services

3.1 The first objective is to set out the information of Grain SA so as to enable users of this policy document to properly identify the relevant particulars of Grain SA, as follows:-

<b>NAME</b>	Grain SA, a voluntary association of members that is administrated in terms of its constitution, a copy of which can be obtained at <a href="https://www.grainsa.co.za/pages/about-grain-sa/our-constitution">https://www.grainsa.co.za/pages/about-grain-sa/our-constitution</a> .
<b>REGISTERED &amp; POSTAL ADDRESS:</b>	Block C, Alenti Office Park, No. 457 Witherite Road, The Willows, Pretoria PO Box 74087 Lynnwood Ridge 0040
<b>EMAIL ADDRESS FOR INFORMATION PURPOSES:</b>	nicov@grainsa.co.za
<b>TELEPHONE:</b>	T: 08600 47246
<b>INFORMATION OFFICER:</b>	<b>Name:</b> Mr. Nico Vermaak Corporate Secretariat <b>Address:</b> c/o Grain SA, Block C, Alenti Office Park, No. 457 Witherite Road, The Willows, Pretoria <b>Email:</b> nicov@grainsa.co.za <b>Telephone Numbers:</b> 08600 47246

3.2 The further objectives of this policy document are to: -

- 3.2.1 Set out the various categories of personal information received by Grain SA;
- 3.2.2 Set out the methods by which such information is obtained by Grain SA;
- 3.2.3 Set out the manner in which such personal information is processed;
- 3.2.4 Set out the manner in which such personal information is stored;
- 3.2.5 Set out the manner in which such personal information is shared;
- 3.2.6 Set out the manner in which such personal information is retained and eventually deleted.
- 3.2.7 Set out a disciplinary procedure in the event of employees transgressing the provisions of this code of conduct.

## SECTION 4: COLLECTION OF PERSONAL INFORMATION

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- 4.1 Grain SA, as a voluntary association, consists of members that subscribe to the association voluntarily and the organization consists of local grain operating branches, study groups, regional management structures, the executive and Congress and any such further structures within the Grain SA group as defined and set out in the Constitution of Grain SA;
- 4.2 During the course of its interaction with its Members and the stakeholders as defined, Grain SA must necessarily obtain personal information from both private individuals and juristic persons;
- 4.3 The collection and processing of such personal information is necessary to further the objectives of Grain SA, which are set out in the Constitution of Grain SA as follows:
  - 4.3.1 To gain recognition and to act as the sole mouthpiece of grain producers in South Africa in relation to all matters within their sphere of interest and promote the interests of grain producers and all branches of the grain industries.
  - 4.3.2 To obtain a say in decision-making and other processes that affect the interests of grain producers, on behalf of its members.
  - 4.3.3 To develop and promote unity and a spirit of collaboration and togetherness among grain producers and to act as a single interest group on behalf of grain producers, provided that all matters are treated strictly on merit and a business basis and under no circumstances on the basis of party-political considerations.
  - 4.3.4 To strive for the effective production and informed marketing of grain and grain products.
  - 4.3.5 To bring about and promote the best mutual relationships among producers, consumers and processors of grain and grain products.
  - 4.3.6 To conduct or to procure the conducting of any research that is directly or indirectly in the interest of grain producers or the grain industry.
  - 4.3.7 To promote the storage, handling, processing and marketing of grain products and to bargain for the lowest possible prices and cost structures in relation to farming requisites for grain producers.
  - 4.3.8 Notwithstanding the fact that all common interests of grain producers in South Africa are served by Grain SA, to recognise the necessity for specialised services with regard to specific commodities represented within Grain SA, and to provide for the servicing of such specialised needs.
  - 4.3.9 To recognise the interests of developing grain producers of grain products by providing for representation of such producers' interests in the Executive and in the Grain SA structure
- 4.4 Grain SA undertakes to measure the collection of any information against the purpose-justification approach whereby the following is asked when collecting personal information:-
  - 4.4.1 Is the information gathered necessary for the purpose?
  - 4.4.2 Is the information gathered the minimum information necessary to achieve its purpose?

- 4.5 Grain SA collects the following types of personal information:-
- 4.5.1 Personal details of Grain SA members of Grain SA whereby is included identity numbers, telephone numbers, addresses and geographical information;
  - 4.5.2 Personal details of all Grain SA employees (inclusive of remuneration details and banking information) of Grain SA whereby is included identity numbers, telephone numbers, addresses and geographical information;
  - 4.5.3 Contact details of businesses and individual business functionaries such as Executives, service providers and employees;
  - 4.5.4 Personal details and photographs of prospective farmers in terms of the Farmer Development division of the Association whereby is included identity numbers, telephone numbers, addresses and geographical information;
  - 4.5.5 Contact details of industry associates inclusive of their employees' contact details, telephone numbers, addresses and geographical information;
  - 4.5.6 Contact details of VIP's and Exhibitors at the NAMPO Agricultural Exhibition; or other exhibitions or events that are being managed or presented by Grain SA.
- 4.6 In the collection of personal information, Grain SA will first and foremost always try to obtain information with the direct consent from the data subject by:-
- 4.6.1 Giving adequate notice to a data subject that personal information as defined is being gathered by Grain SA;
  - 4.6.2 Informing the data subject of the purpose of the collection of the information – the “purpose justification”;
  - 4.6.3 Informing the data subject of the minimum amount of information necessary for collection to achieve its purpose;
- 4.7 In circumstances where direct consent cannot be obtained from the data subject, Grain SA will assess the collection of personal information against the following legal processing benchmarks:-
- 4.7.1 Is the information gathered with a view to the performance of a contractual obligation;
  - 4.7.2 Is the information gathered with a view to the performance of a statutory duty or legal requirement placed on Grain SA;
  - 4.7.3 Is the information gathered to protect the interests of the data subject or that of Grain SA.
- 4.8 Grain SA undertakes to cease with the collection of any personal information at any time that the data subject gives any indication that it withdraws its consent for the collection thereof and indicate the implications of the withdrawal of such consent to the data subject such as, for example, that an Application for membership cannot be continued with or such other activity that has the collection of personal information as a requirement.
- 4.9 During the course of its activities, Grain SA receives personal information indirectly as collected by and from third parties such as its study groups or agents or other third-party associates. These third-parties are, for purposes of this policy document, “operators” as defined in Section 1 above. When information is gathered from such operator on a derived basis, Grain SA undertakes to enquire as to whether the information obtained:-

- 4.9.1 Was collected with the consent of the data subject;
- 4.9.2 Is necessary and sufficient for the purpose it is received for;

4.10 Grain SA collects information in the following manner:-

- 4.10.1 Digital collection by way of receipt on email;
- 4.10.2 Digital collection by way of receipt on WhatsApp or other messaging platform;
- 4.10.3 Physical collection by receipt of hand-delivered documents or couriered documents;

- 5.1 In compliance with Grain SA's purpose-justification approach, personal information will only be processed if:-
- 5.1.1 The data subject has consented thereto;
  - 5.1.2 The personal information is processed as a necessity for the performance of a contractual obligation;
  - 5.1.3 The personal information is processed as part of a statutory or legal obligation placed on Grain SA;
  - 5.1.4 The processing is required to perform a public duty;
  - 5.1.5 The processing is in the furtherance of the legitimate interests of the data subject as set out in 5.3 below.
  - 5.1.6 The processing is in the furtherance of the legitimate interest of Grain SA;
- 5.2 Grain SA undertakes to, at all times, cease with the further processing of any personal information at such time as a data subject withdraws its consent for the processing thereof, or in the event that the purpose for the processing of the information has ceased to exist.
- 5.3 If the processing of information cannot be termed under section 5.1 above, or otherwise objects thereto, it must be assessed whether the processing of such information furthers any of the data subject's legitimate interests. Assessing such interests is a value-judgment that must be made to assess why the data subject interacted with Grain SA in the first instance, what the intention of such interaction was, the desired outcome thereof should be and whether, in the processing of the personal information, these objectives can be achieved without the necessity of asking for specified consent for each and every instance of processing of the personal information.
- 5.4 An important aspect to communicate to a data subject is to inform the data subject of the reason that the information is gathered and explain how the information will be utilized and for what purpose. If the purpose is legitimate and in accordance with the true intention behind the interaction with Grain SA, for example a contractual or member-related purpose, then the processing may continue. Grain SA undertakes not to utilize personal information for any reasons or justifications not related to 5.1 above.

- 6.1 Grain SA stores personal information in the following manners:-
- 6.1.1 Digitally on a server-based system entitled the NAV-system which is currently, at the time of use of this policy, the operating system. The provisions of this policy will continue for all further cloud-based or other substitutes for this system;
  - 6.1.2 Digitally of each Grain SA Employee on their own personal computer or laptop provided by Grain SA;
  - 6.1.3 Physical copies, where applicable, are stored in cabinets or drawers that are capable of being locked and access-controlled;
- 6.2 For purposes of securing personal information, all personal computers or laptops will have access-control to the data contained thereon in the form of a password or biometric log-in if applicable.
- 6.3 It is for each division to determine which individuals shall have access to computer devices and what information will be necessary for such Grain SA employee to have access to and to what extent based on such employee's work functions to be undertaken. When a request for personal information (under Section 13 below and read with PAIA) is received, the Information Officer will liaise with the Head of such Division to make a value-judgment regarding the sensitivity and value of the information requested;
- 6.4 In compliance with the purpose-identification approach, only such individuals of entities that have a necessity to access certain personal information will be allowed access to the computer or information management system that contains such data;
- 6.5 Grain SA acknowledges that the NAV-system as currently in use is, for purposes of the POPI-Act, an "information matching program" as defined in the POPI-Act. Grain SA further acknowledges that, where the Excel or other spreadsheet programmes are used, these programs are also subjected to the term of an "information matching program" and that the input of such information into such program qualifies as being input by "automated means" as defined in Section 3(4) of the POPI-Act;
- 6.6 All Grain SA Employees are responsible for ensuring that any personal information with relation to themselves and of data subjects and which they hold is kept securely and that same is not disclosed to any authorized third-party. As a guidance, any electronic device or physical copies containing personal information should:-
- 6.6.1 Be kept in a lockable room with controlled access; and
  - 6.6.2 Preferably be kept in a locked drawer or filing cabinet;
  - 6.6.3 Stored on a secure server and not on a stand-alone or local system that can easily be physically removed or stolen;
  - 6.6.4 Preferably not kept on flashdisks or memory "sticks" which can easily go missing or get stolen. When personal information is moved between devices using such a memory "stick" or flashdisk, the transferor of such information will ensure that such "stick" or flashdisk is immediately clean once the data transfer to the receiving device has been attended to;
  - 6.6.5 Encrypted with a password that is not known, widely shared or that there exists some form of deductible formula to arrive at the password.
  - 6.6.6 Should not be left unattended in any form of communal or high-traffic areas;

- 6.7 When processing personal information, the user should attempt to ensure that all computer monitors and whatsoever other screens are not visible to anyone other than the user at the time. The user should apply a minimum screensaver timeframe so that the information is not visible to third-parties for long durations of time;
- 6.8 Employees should, where possible, and at the end of the working day ensure that no documents containing personal information be left around on their desk and be easily visible and to clear same up;
- 6.9 Any breaches in the protocols set out above must immediately be reported to the Information Officer who will assess whether personal information has been disseminated to third-party's and what the impact thereof is.
- 6.10 At the detection of a breach of personal information, the Information Officer will contact the Head of the Division in which the breach occurred and, on an ad-hoc basis, attend to mitigation of the risk and the further spreading of the breach and will put the following interim measures in place:-
  - 6.10.1 By assessing and auditing where the breach occurred and which permission structures were breached – in this event all passwords for such Division will have to be changed and where necessary, a user's access will be suspended until such time as a full investigation has been attended to;
  - 6.10.2 In the event of a breach as a result of "hacking" or other malware, the infected computer will be disconnected from all networking capability and sent for cleaning by the IT-Division;
  - 6.10.3 The Information Officer will report such breach to the Information Regulator and, after completion of the audit, inform such parties whose information has been leaked thereof;

## SECTION 7: SHARING AND TRANSFER OF PERSONAL INFORMATION

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- 7.1 Grain SA, during the course of its business activities, shares information with third-parties in the pursuance of its legitimate business interests and shares information internally between divisions. The third-parties that Grain SA shares information with, other than internally, are as follows:-
- 7.1.1 Auditors and accountants;
  - 7.1.2 Attorneys and other forms of legal representatives such as consultants;
  - 7.1.3 Funders and other financiers;
  - 7.1.4 Statutory bodies;
  - 7.1.5 Statistical collection services.
- 7.2 Grain SA undertakes, as outlined in this policy, not to share personal information:-
- 7.2.1 Where the data subject has not consented to such sharing;
  - 7.2.2 Where the personal information will have an adverse or prejudicial effect on the data subject's interests;
  - 7.2.3 Where the sharing of such information is expressly prohibited in this policy or the POPI-Act;
- 7.3 Internal sharing between Divisions should only be done on a purpose-justification approach insofar as each of the Divisions make use of the particular information and that there will be a negation of approaching the data subject twice for the same information.

## SECTION 8: ACCESS TO INFORMATION AND RIGHTS OF DATA SUBJECT

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- 8.1 Grain SA acknowledges that data subjects have the following rights with regards to their personal information as provided for in terms of Section 5 of the POPI-Act:-
- 8.1.1 The right to be notified that personal information of the data subject is being collected or accessed;
  - 8.1.2 The right to establish what personal information has been collected, processed and accessed by Grain SA;
  - 8.1.3 The right to request the destruction or deletion of the data subject's personal information;
  - 8.1.4 The right to object that certain data has been collected or collected for an unrequired purpose;
  - 8.1.5 The right not to have the data subject's personal information shared or marketed;
  - 8.1.6 The right not to have certain decisions about the data subject's interests taken based on the contents of the personal information;
  - 8.1.7 The right to submit a complaint to the Information Regulator;
  - 8.1.8 The right to institute civil proceedings in the event of a transgression of the above rights.
- 8.2 The data subject has the right to request that data be updated, corrected or deleted – in this respect, with regards to deletion, reference is made to the contents hereunder in Section 9 of this Policy Document detailing which information must be kept out of a statutory duty and which cannot be deleted from the keeping of Grain SA;
- 8.3 Grain SA undertakes to, where necessary, inform a data subject of the right to request that their information must be destroyed or de-identified and, on any further forms or first-contact correspondence, inform the data subject of these rights;
- 8.4 Where possible, any request for personal information must always indicate the necessity or objective of why such information is collected;
- 8.5 Grain SA undertakes to, where necessary, make provision in any form or request for information indicate to the data subject that it has a right to have such information deleted or destroyed and that, if no such request is given, such data will be retained for a minimum period of fifteen years;
- 8.6 Grain SA undertakes not to share any personal information with any third-parties not related to the business and functions of Grain SA inclusive of any marketing or other data-collection services unless required by law to do so.
- 8.7 Grain SA undertakes to, when required and when requested to do so, provide a data subject with the below information for purposes of lodging any complaint regarding any alleged abuse or malprocessing of the data subject's personal information:-

**The Information Regulator (South Africa)**

**The Information Regulator address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.**

**P.O Box 31533, Braamfontein, Johannesburg, 2017**

**Email: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)**

- 8.8 Any requests made regarding the nature and contents of personal information held is to be dealt with in terms of Section 13 below which details the processes and procedures for requesting such information under PAIA.

## SECTION 9: RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

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- 9.1 In compliance with the purpose-based justification approach, Grain SA undertakes to evaluate personal information kept and that such information will not be kept past any timeframe that such information no longer has any necessity;
- 9.2 Grain SA acknowledges that, in terms of certain statutory and legal requirements such as the Financial Intelligence Centre Act, Act 38 of 2001 and the Income Tax Act, Act 58 of 1962, some personal information must be kept for specified minimum periods and it is the policy of Grain SA that such information is kept for a minimum period of fifteen years.
- 9.3 Grain SA undertakes to destroy information, prior to the expiry of the period mentioned above when:-
- 9.3.1 The information was obtained for an ad-hoc or short-term purpose and such purpose will no longer be necessary for the retention of such information;
  - 9.3.2 The data subject has requested that its information be deleted or destroyed;
  - 9.3.3 The data subject has withdrawn its consent that such information be retained further than is necessary;
- 9.4 Grain SA undertakes to have a designated drop off point for documents of a personal nature that must be destroyed by way of shredding or some other permanent form of de-identification of the documents and will, where possible, have shredding facilities onsite for purposes hereof;
- 9.5 If necessary, Grain SA will further ensure that a service provider is engaged that can render the appropriate service of the full and total destruction of documents and that same becomes de-identified as required by the POPI- Act;
- 9.6 Annually, the Information Officer will liaise with each Division Head to determine what type of information has become obsolete and make such arrangements necessary to destroy such information;
- 9.7 With regards to electronic hardware – prior to any hardware being decommissioned or disposed of, the internal Information Technology team at Grain SA will ensure that any information stored on such a machine is deleted in its entirety and that such data will also not be recoverable by any other technological means. Grain SA will further engage with a service provider, if necessary, to attend to the destruction of the hardware.

## SECTION 10: MARKETING, MEDIA & OTHER INFORMATION

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- 10.1 During the course of its activities, Grain SA regularly relates information to the media, to social media and presents industry-related events available to the general public and to invitees for the NAMPO Agricultural Exhibition, or other exhibitions or events that are being managed or presented by Grain SA as follows:-
- 10.1.1 WhatsApp groups with interested parties such as members, emerging farmers and operators;
  - 10.1.2 A Magazine publication entitled "SA Grain"
  - 10.1.3 Events such as presentation of the NAMPO Agricultural Exhibition and the meetings of the Congress of Grain SA;
- 10.2 Grain SA undertakes to, where necessary and possible, include in its WhatsApp and other associated communications, a notice to the effect that a participant in such conversation has the opportunity to opt out of such conversation at any time and ensure that such participant is able to manually remove itself from the conversation;
- 10.3 Where necessary and possible, Grain SA undertakes not to have participants' personal information be visible to other participants unless the particular platform used does not provide for such an option;
- 10.4 Section 7 of the POPI-Act provides for a justification in the use of personal information for literary expressions being an extension of the right to freedom of expression; however, Grain SA undertakes that:-
- 10.4.1 Any personal information published will only be such information as will be necessary to give effect to the purpose of the publication and not publish any unnecessary contact details;
  - 10.4.2 Grain SA will attempt to get the consent of a data subject prior to making any publications about such data subject. This will include photographs being taken of a data subject which photographs, for purposes of this policy, is also identifiable personal information;
  - 10.4.3 Grain SA will assess the effect of the publication on the data subject and whether it correlates with the intended purpose of such publication;
- 10.5 With regards to the presentation of industry-related functions or other exhibitions or events that are being managed or presented by Grain SA such as the NAMPO Agricultural Exhibition and meeting of Congress, Grain SA undertakes to:-
- 10.5.1 Obtain, as near as possible, only such information that is voluntarily submitted by invitees such as business contact information and not obtain any other personal information from the data subject other than what may be necessary;
  - 10.5.2 Not disseminate unnecessary personal information to other invitees that the data subject would not be prepared to disseminate themselves to prospective industry participants;
  - 10.5.3 Only display such information on billboards, attendance registers and guest lists as is necessary for the identification of an invitee and their business affiliation or any such details as the invitee has consented to;
  - 10.5.4 When entering into Exhibitor or other Agreements, ensure that such Agreements are only dealt with and presented to the necessary delegated officials that attend to the event in this capacity and since the agreements may contain both sensitive commercial and personal information;
  - 10.5.5 For key-note speakers, ministerial and government officials attending the proceedings, Grain SA will ensure that the personal information of these individuals are not shared in any form of published material other than to introduce and identify such speaker or invitee;

- 10.5.6 When making use of a third-party ticketing or other service providers, Grain SA will ensure that such provider has the necessary policy and other safeguards in place when receiving personal information of invitees and bookings to protect their personal information when purchasing tickets online.
- 10.6 Grain SA operates a website hosted at domain name: **www.grainsa.co.za**. In respect of the website, there is a landing page for members of the public and a log-in section for members. With regards to the landing page for the public, the website does not contain a variety fields or functionality where a member of the public must input information into the website and no personal information is collected during the interaction with the website, save for as provided below;
- 10.7 When accessing the website, and the user requests that Grain SA contacts the user, the user inputs some personal information relating to its personal details, communication details and geographic details. It is assumed that any person willingly entering such information does so by own volition and thus consent is given – Grain SA undertakes, when receiving information via this request-page, only to make contact with such data-subject and, once such contact has taken place and no further processing is necessary, to delete this information permanently;
- 10.8 Grain SA Members that make use of the log-in section have given their consent to enter their log-in details and this personal information during the log-in process is given voluntarily;
- 10.9 During the interaction with the website, such user may unknowingly give personal information by way of technological operation whereby the user's IP (Internet Protocol) information of their own computer is shared and such other technological markers as may be necessary to access the website. Typically, this information does not amount to a sharing of other personal information and the user interacts in this technological manner by their own accord and consent;
- 10.10 When a user browses the website, "cookies" are exchanged between the computer using the Grain SA website and the website itself. Such a "cookie" is a small data file that a browser places on a computer or browsing device. Such "cookies" do not, in themselves, collect personal information in the form of addresses or contact details, but they can locate geographical and other technological information;
- 10.11 Grain SA can, however, not be held liable for any malicious software or "malware" that operates during these exchanges but undertakes to provide reasonable IT-protection in this respect. Users are able to make such changes to settings on their own personal browsers in this respect.
- 10.12 Grain SA will ensure that:-
- 10.12.1 Wording is developed for purpose of inclusion into contracts and agreements which sets out the requirement of consent to personal information being collected;
  - 10.12.2 Wording is developed for purpose of inclusion into email signatures which sets out the requirement of consent to personal information being collected;
  - 10.12.3 Consent forms are designed and / or supplemented to include reference to this policy being available for perusal and further that the data subject gives their express consent for purposes of collecting its personal information.

## SECTION 11: DISCIPLINARY ACTION FOR TRANSGRESSIONS

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- 11.1 Any Grain SA employee found to have wilfully transgressed the provisions of this policy document will be subjected to disciplinary action as provided for in the disciplinary codes and procedures of Grain SA and this Section of the Policy Document will defer to the current provisions of any such applicable disciplinary codes in operation at Grain SA and as amended from time to time;
- 11.2 Any Grain SA employee that wilfully shares personal information with third-party marketing or that disseminates information to a third party that is not integral to the business of Grain SA will receive a first written warning and, after assessing the seriousness of the transgression, may be required to attend a disciplinary hearing.
- 11.3 If an offense is committed during the course and scope of the employment of a Grain SA Employee, Grain SA may be indirectly liable for any penalty or administrative fine levied under Section 109 of the POPI-Act and which fine or levy may be apportioned to the Employee in the event that Grain SA suffers damages as a result of such conduct.

- 12.1 The Information officer, at time of first instance of this policy document, is the individual mentioned in the table at paragraph 3.1 of this Policy Document. A new Information Officer of Deputy Information Officers may be appointed or substituted by Grain SA from time-to-time;
- 12.2 The Information Officer must attend to the following responsibilities and as fully described in Sections 55 and 56 of the POPI-Act:-
  - 12.2.1 Oversee the review and development of this policy over the course of time;
  - 12.2.2 Make any such further recommendations and guidelines from time to time for the safe collection, storage, sharing and destruction of personal information;
  - 12.2.3 Perform a value-judgment in situations where necessary with regards to the sharing and collection process and when data breaches occur;
  - 12.2.4 Being a process of ensuring that further agreements entered into by Grain SA contains sufficient notification and request for consent in keeping with the purpose-justification approach;
  - 12.2.5 To be the person of first-contact with regards to the Information Regulator and to report all data breaches to the Grain SA Executive and Office of the Information Regulator and take such steps as may be advised by the Regulator;
  - 12.2.6 To attend to requests made in terms of PAIA and to delegate compliance with such requests, exercising a value-judgment when requests are made and to make such assessments as are necessary.

## 1. THE PROMOTION OF ACCESS TO INFORMATION ACT – PURPOSE OF THIS MANUAL

- 1.1 Grain SA, as a voluntary association, consists of members that subscribe to the association voluntarily and the organization consists of local grain operating branches, study groups, regional management structures, the Executive and Congress.
- 1.2 The Promotion of Access to Information Act, No 2 of 2000 ("**the Act**") was enacted on 3 February 2000, giving effect to the constitutional right in terms section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 ("**the Constitution**") of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.
- 1.3 In terms of Section 51 of the Act, all Private Bodies are required to compile an Information Manual ("**PAIA Manual**"). This manual works in tandem with the Grain SA POPI-Policy which is a policy formulated in terms of the POPI-Act and this manual sets out the terms and requirements for how such personal information can be requested from Grain SA;
- 1.4 Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and / or regulatory requirements, except where the Act expressly provides that the information may or must not be released. The Act sets out the relevant procedure to be adopted when requesting information from Grain SA
- 1.5 This PAIA Manual is developed in conjunction with Grain SA's policy in terms of the POPI-Act with which policy this manual functions with. This manual will be made available on Grain SA's website and sets out, when personal information has been gathered, how this information can be requested from Grain SA.

## 2. GRAIN SA STRUCTURE AND INFORMATION

- 2.1 As a voluntary association, Grain SA is regulated by the terms of its Constitution which was adopted and as amended from time to time. The full Constitution of Grain SA can be found at the following web-address: <https://www.grainsa.co.za/pages/about-grain-sa/our-constitution>;
- 2.2 The following table sets out the necessary and required particulars of Grain SA:-

<b>NAME</b>	Grain SA, a voluntary association of members that is administrated in terms of its constitution, a copy of which can be obtained at <a href="https://www.grainsa.co.za/pages/about-grain-sa/our-constitution">https://www.grainsa.co.za/pages/about-grain-sa/our-constitution</a> .
<b>REGISTERED &amp; POSTAL ADDRESS:</b>	Grain SA, Block C, Alenti Office Park, No. 457 Witherite Road, The Willows, Pretoria. PO Box 74087, Lynnwood Ridge, 0040
<b>EMAIL ADDRESS FOR INFORMATION PURPOSES:</b>	nicov@grainsa.co.za
<b>TELEPHONE:</b>	T: 08600 47246
<b>INFORMATION OFFICER:</b>	<b>Name:</b> Mr. Nico Vermaak - Company Secretariat Lead <b>Address:</b> Block C, Alenti Office Park, No. 457 Witherite Road, The Willows, Pretoria <b>Email:</b> nicov@grainsa.co.za <b>Telephone Numbers:</b> 08600 47246

- 2.3 A guide has been compiled in terms of Section 10 of the Act by the South-African Human Rights Commission (the “SAHRC”) which explains the use and Application of the PAIA-Act in more linguistic terms and in plain language. For more information, you can attend at the following website: [www.sahrc.org.za](http://www.sahrc.org.za)

Or you can write to the SAHRC at the following particulars:-

The South African Human Rights Commission  
Braampark Forum 3, 33 Hoofd Street, Braamfontein  
Private bag x2700, Houghton, 2041  
Tel Number: 011 877-3600  
Fax Number: 011403-06680668  
E- mail: [info@sahrc.org.za](mailto:info@sahrc.org.za)

### 3. RECORDS AVAILABLE IN TERMS OF SOUTH AFRICAN LEGISLATION [Section51(1)(d)]

Grain SA keeps information as mandated in terms of the following legislation and as statutorily required. This list is subject to amendment.

- Consumer Protection Act 68 of 2008
- National Credit Act No 34 of 2005
- Income Tax Act No 58 of 1962
- Value Added Tax Act No 89 of 1991
- Companies Act No 71 of 2008 and Applicable Regulations
- Competition Act No 89 of 1998
- Promotion of Access to Information Act 2 of 2000
- King Report on Corporate Governance in South Africa (King IV)
- Basic Conditions of Employment Act No 57 of 1997
- Broad Based Black Economic Empowerment Act No 53 of 2003 Compensation for Occupational injuries and Diseases Act No 130 of 1993 Employment Equity Act No 55 of 1998
- Labour Relations Act No 66 of 1995
- Occupational Health and Safety Act No 85 of 1993
- Skills Development Levies Act No 9 of 1999
- Unemployment Insurance Act No 30 of 1966
- Electronic Communications and Transactions Act No 25 of 2002
- Financial Intelligence Centre Act No 38 of 2001
- Protection of Personal Information Act, Act 2 of 2013
- Financial Intelligence Centre Act, Act 38 of 2001.
- Agricultural Products Marketing Act, Act 47 of 1996
- The Trust Property Control Act, Act 57 of 1988
- Financial Markets Control Act, Act No. 55 of 1989

#### **4. RECORDS (SECTION 51 & 52 OF THE ACT)**

4.1 The following records are readily available and kept at the office of Grain SA and there is no procedure for requesting them from Grain SA:-

- 4.1.1 Any published literature such as magazines and advertising material and which information is available for download or review on the Association's website;
- 4.1.2 Any documents that are required by statute to lie open for inspection at the offices of the Association;
- 4.1.3 Any form of published annual reports and information that is publicly accessible by their nature;

4.2 The following records are held by Grain SA, but are only accessible by way of Application in terms of the provisions of this manual and the applicable request-procedures.

- 4.2.1 Information relating to the personnel and personnel records of Grain SA inclusive of past, present and unsuccessful prospective personnel;
- 4.2.2 Information relating to the Members of the Association and insofar as such information has not been consented to for sharing by the applicable Member;
- 4.2.3 Unpublished records relating to the financial, operational, marketing, internal divisional documents and the Association's procedures;
- 4.2.4 Commercial agreements with suppliers, transactional arrangements, service providers and other contractual agreements such as insurance and Intellectual Property information;
- 4.2.5 Minutes of meetings of Congress or any oversight or divisional Board;
- 4.2.6 Databases kept subject to the provisions of the POPI-Act;
- 4.2.7 Information held of third-parties and held in accordance with the provisions of the POPI-Act;

#### **5. REQUESTING INFORMATION FROM GRAIN SA IN TERMS OF THIS MANUAL**

5.1 A person making a request in terms of this manual is termed a "requester". The requester must, for any of the categories of information set out above and of which information is requested, fill out the prescribed form which is attached to this manual. The requester must furnish the following details in the request and provide the following information:-

- 5.1.1 Sufficient particularity with regards to the forms and documents requested;
- 5.1.2 Sufficient information to identify the requester and his / her / its interest in the documentation requested and by indicating whether the documents are requested to protect or exercise a right and what that right is.
- 5.1.3 Sufficient contact information for the information officer to contact the requester and what such preferred method of contact is;

5.2 The Act makes provision for a fee to be charged for the copies of any of such documents as the requester may request and which is, after consideration, furnished to the requester and the following are the applicable fees pertaining to such copies, whether made physically or digitally transmitted;

5.3 Grain SA will, through the Information Officer, assess and make a value-judgment as to whether the requester is entitled to the information requested and with reference to the nature of the request, any prejudice and confidentiality

applicable thereto and any further such considerations as Grain SA may, in writing, advise. Such considerations may include:-

- 5.3.1 Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information about that natural person [Section 63]. A record will not be refused in so far as:-
  - 5.3.1.1 it consists of information about an individual who has consented to the disclosure of the record;
  - 5.3.1.2 or which is already publicly available; that was given to Grain SA by the individual to whom it relates and the individual was informed by or on behalf of the private body, before it is given, that the information belongs to a class of information that would or might be made available to the public;
  - 5.3.1.3 about an individual's physical or mental health, or well-being, who is under the care of the requester and who is -under the age of 18 years; or incapable of understanding the nature of the request, and if giving access would be in the individual's best interests;
  - 5.3.1.4 about an individual who is deceased and the requester is the individual's next of kin; or making the request with the written consent of the individual's next of kin; or about an individual who is or was an official of a private body and which relates to the position or functions of the individual, including, but not limited to - the fact that the individual is or was an official of that private body, the title, work address, work phone number and other similar particulars of the individual;
  - 5.3.1.5 the classification, salary scale or remuneration and responsibilities of the position held or services performed by the individual; and the name of the individual on a record prepared by the individual in the course of employment.
- 5.3.2 Mandatory protection of the commercial information of a third party, if the record contains:
  - 5.3.2.1 Trade secrets of that third party;
  - 5.3.2.2 Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
  - 5.3.2.3 Information disclosed in confidence by a third party to Grain SA, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition [Section 64].
- 5.3.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement [Section 65];
- 5.3.4 Mandatory protection of the safety of individuals and the protection of property [Section 66]. The head of a private body must refuse a request for access to a record of the body if its disclosure could reasonably be expected to endanger the life or physical safety of an individual.
- 5.3.5 Mandatory protection of records which would be regarded as privileged in legal proceedings [Section 67];

5.4 Grain SA, through the Information Officer, will endeavour to provide the requested documentation within THIRTY (30) business days to the requester and after payment of the prescribed fees. The Information Officer may also advise that a longer period is required if:-

5.4.1 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 the private body concerned;

5.4.2 the request requires a search for records in, or collection thereof from, an office of the private body not situated in the same town or city as the office of the head that cannot reasonably be completed within the original period;

5.4.3 consultation among divisions of Grain SA or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original period;

5.4.4 more than one of the circumstances contemplated in the paragraphs above exist in respect of the request making compliance with the original period not reasonably possible;

## **6. REMEDIES AVAILABLE WHEN GRAIN SA REFUSES A REQUEST FOR INFORMATION**

### **6.1 Internal Remedies**

Grain SA does not have an internal appeals procedure for this purpose. As such, the decision made by the Designated Information Officer is final. The requesters will have to exercise such external remedies at their disposal, if the request for information is refused and the requester is not satisfied with the answers supplied by the Designated Information officer.

### **6.2 External Remedies [Section 78]**

A requester that is dissatisfied with the Designated Information officer's refusal to disclose information may, within 30 days of notification of the decision, apply to a Court for relief.

**7. APPLICABLE FEES (As currently determined by the Act and subject to amendment)**

1.	The fee for a copy of the manual as contemplated in regulation 9(2) (c) - for every photocopy of a A4-size page or part thereof.	1, 10
2.	The fees for reproduction referred to in regulation 11(1) are as follows: a. For every photocopy of an A4-size page or page thereof b. For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form c. For a copy in a computer-readable form on: i. Flash drive ii. compact disc d. For a transcription of visual images, for an A4-size page or part thereof e. For a copy of visual images f. For a transcription of an audio record, for an A4-size page or part thereof g. For a copy of an audio record	1,10 0,75  7,50 70,00 40,00 60,00 20,00 30,00
3.	The request fee payable by a requester, other than a personal requester, referred to in Regulation 11(2)	50,00
4.	The access fees payable by a requester referred to in regulation 11(3) are as follows: a. For every photocopy of an A4-size page or part thereof b. For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form c. For a copy in a computer-readable form on: i. floppy disc ii. compact disc d. For a transcription of visual images, for an A4-size page or part thereof e. For a copy of visual images f. For a transcription of an audio record, for an A4-size page or part thereof g. For a copy of an audio record h. 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.	1,10 0,75  7,50 70,0 40,0 60,0 20,0 30,0
5.	For the purposes of section 54(2) of the Act, the following applies: a. six hours as the hours to be exceeded before a deposit is payable; and b. one third of the access fee is payable as a deposit by the requester.	
6.	The actual postage is payable when a copy of a record must be posted to a requester.	

8. **REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY (SECTION 53(1) OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2000) - [REGULATION 10] )**

**A. PARTICULARS OF GRAIN SA**

Physical & Postal Address	Grain SA, Block C, Alenti Office Park, No. 457 Witherite Road, The Willows, Pretoria PO Box 74087 Lynnwood Ridge 0040
Telephone Number	T: 08600 47246
E-mail Address	nicov@grainsa.co.za

**B. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD; THE "REQUESTER"**

The particulars of the person who requests access to the record must be given below:	
The address and/or fax number in the Republic to which the information is to be sent:	
Proof of the capacity in which the request is made, if applicable, must be attached:	
Full Name and Surname:	
Identity Number:	
Postal Address:	
Fax Number:	
Telephone Number:	
Email Address:	
Proof of the capacity in which the request is made, if the request is made on behalf of another person :	

C. Particulars of person on whose behalf request is made

Full Name and Surname:	
Identity Number:	

D. PARTICULARS OF RECORD:

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. IF THE PROVIDED SPACE IS INADEQUATE, PLEASE CONTINUE ON A SEPARATE FOLIO AND ATTACH IT TO THIS FORM. THE REQUESTER MUST SIGN ALL THE ADDITIONAL FOLIOS.

Description of record or relevant part of the record:
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 HAS BEEN PAID. YOU WILL BE NOTIFIED OF THE AMOUNT REQUIRED TO BE PAID AS THE REQUESTFEE.

THE FEE PAYABLE FOR ACCESS TO A RECORD DEPENDS ON THE FORM IN WHICH ACCESS IS REQUIRED AND THE REASONABLE TIME REQUIRED SEARCHING FOR AND PREPARING A

RECORD. IF YOU QUALIFY FOR EXEMPTION OF THE PAYMENT OF ANY FEE, PLEASE STATE THE REASON FOR EXEMPTION.

Reason for exemption from payment of fees:
--

**F. FORM OF ACCESS TO RECORD**

IF 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.

Disability:	Form in which the record is required;
-------------	---------------------------------------

MARK THE APPROPRIATE BOX WITH AN X. NOTES:

- (A) COMPLIANCE WITH YOUR REQUEST IN THE SPECIFIED FORM MAY DEPEND ON THE FORM IN WHICH THE RECORD IS AVAILABLE.
- (B) ACCESS IN THE FORM REQUESTED MAY BE REFUSED IN CERTAIN CIRCUMSTANCES. IN SUCH A CASE YOU WILL BE INFORMED IF ACCESS WILL BE GRANTED IN ANOTHER FORM.
- (C) THE FEE PAYABLE FOR ACCESS TO THE RECORD, IF ANY, WILL BE DETERMINED PARTLY BY THE FORM IN WHICH ACCESS IS REQUESTED.

IF THE RECORD IS IN WRITTEN OR PRINTED FORM	
<input type="checkbox"/>	Copy of Record
<input type="checkbox"/>	Inspection of Record

IF THE RECORD CONSISTS OF VISUAL IMAGES [this includes photographs, slides, video recordings, computer-generated images, sketches, etc]	
<input type="checkbox"/>	View the Images
<input type="checkbox"/>	Copy of Images
<input type="checkbox"/>	Transcription of Images

IF RECORD CONSISTS OF RECORDED WORDS OR INFORMATION WHICH CAN BE REPRODUCED IN SOUND:			
	Listen to the soundtrack (audio cassette)		Transcription of soundtrack* (written or printed documents)

IF RECORD IS HELD ON COMPUTER OR IN AN ELECTRONIC OR MACHINE-READABLE FORM:			
	Printed copy of record*		Printed copy of information derived from the record*
	Copy in computer readable form* (compactdisc)		

*IF YOU REQUESTED A COPY OR TRANSCRIPTION OF A RECORD (ABOVE), DO YOU WISH THE COPY OR TRANSCRIPTION TO BE POSTED TO YOU?	YES	NO
---	-----	----

G. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED  
 IF THE PROVIDED SPACE IS INADEQUATE, PLEASE CONTINUE ON A SEPARATE FOLIO AND ATTACH IT TO THIS FORM. THE REQUESTER MUST SIGN ALL THE ADDITIONAL FOLIOS.

Indicate which right is to be exercised or protected:
Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. **NOTICE OF DECISION REGARDING REQUEST FOR ACCESS**  
 YOU WILL BE NOTIFIED IN WRITING WHETHER YOUR REQUEST HAS BEEN APPROVED/DENIED. IF YOU WISH TO BE INFORMED IN ANOTHER MANNER, PLEASE SPECIFY THE MANNER AND PROVIDE THE NECESSARY PARTICULARS 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 .....

\_\_\_\_\_  
 Signature of Requester

\_\_\_\_\_  
 Signature of person on whose behalf  
 the request is made