



ALARIS ANTENNAS

PAIA and POPIA Manual

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act (PAIA), 2000 and to address requirements of the Protection of Personal Information Act (POPIA), 2013.

<u>DOCUMENT NUMBER</u>	:	PAIA-0001
<u>REVISION</u>	:	01
<u>DATE</u>	:	2025-10-15
<u>FILENAME</u>	:	PAIA-0001 Alaris Antennas PAIA And POPIA Manual Updt 2025-10

Alaris Antennas (Pty) Ltd
1 Travertine Ave, N1 Business Park,
Centurion, 0157, South Africa



South Africa

Directors: J Dresel Dipl.Ing MSc Eng(Elec), R Ramnath-Kowlesar
(HRM), CP van der Merwe BEng(Elec) (Hons), GT Heyman CA(SA)
Co Reg No: 2013/048197/07 **VAT No:** 4520267925

A SUBSIDIARY OF



NOTICE

This document is the property of Alaris Antennas (Pty) Ltd. All rights of copyright are reserved by Alaris Antennas. This document must not be reproduced or used for any other purpose than that for which it was intended without written permission. Alaris Antennas reserves the right to change any information contained in this document without prior warning. It is the users' responsibility to ensure that the appropriate issue of this document is being used. While Alaris Antennas has taken every care in the preparation of this document, Alaris Antennas does not accept responsibility for loss or damage alleged to have been suffered arising out of errors or omissions.

CONTROLLED DOCUMENTATION

Notwithstanding the terms of the above disclaimer, Alaris Antennas undertakes to supply the Customer, or Controlled Copy recipient, with all updates or amendments to this document.

Document History


REVISION	DATE	DESCRIPTION OF CHANGE	AUTHOR
00	2021/06/30	Initial Release	Trudi Cox
01	2025/10/15	<ul style="list-style-type: none"> • Use new branded template • Update E-mail address of Information Officer • Replace FORM-00105 with the Information Regulator FORM 2, using our Alaris branding 	Trudi Cox

Approval Sheet


Action	Name	Job Title / Role
Prepared by:	AT Cox	Compliance Manager
Reviewed by:	Viktor Marinov	Chief Quality Officer / IO
Approved by:	G Heyman	Managing Director / DIO

Table of Contents

1	Alaris Antennas Company Profile	6
1.1	Company History	6
1.2	Mission and Vision	6
2	Terminology relevant to PAIA and POPI Acts	7
3	Introduction to the PAIA and POPI Acts	10
3.1	Background to the promotion of access to information act.....	10
3.2	Background to the Protection of Personal Information Act 4 of 2013 (POPIA)	11
3.3	Purpose of the PAIA and POPIA Manual	12
3.4	Availability of the PAIA and POPIA Manual.....	12
4	Details in terms of the section 51 PAIA manual	12
4.1	Company Details.....	12
4.2	Contact Details of Alaris Antennas Managing Director [Section 51(1)(a)].....	13
4.3	Alaris Antennas Information officer [Section 51(1)(b)].....	13
5	Records held by Alaris Antennas.....	14
6	Processing of Personal Information	21
6.1	The 8 Conditions or Principles of POPIA	21
6.2	Data Privacy Rights	23
6.3	Purpose of the Processing of Personal Information	24
6.4	Purpose of processing of Personal Information by Alaris Antennas.....	26
6.5	Categories of data subjects and personal information processed by Alaris Antennas	26
6.6	Sharing of Personal Information	27
6.7	Measures to protect personal information	28
6.8	Trans-border flow of personal information	28
6.9	Alaris Antennas DATA privacy policy	29
6.10	Data/Information Security	29
6.11	POPIA Incidence Response Plan	29
7	How to request Information.....	30
7.1	Procedure to request Information in terms of PAIA	30
7.2	Duties of the Information Officer in this process (taken from PAIA Guide of SA Human Rights Commission).....	31
7.3	Fees Relevant to Information Requests	33
7.4	Legal Recourse	34
8	How to request changes to Personal Data and processing thereof	34
8.1	objecting to processing of Personal Information by a data subject.....	34
8.2	Request for correction or deletion of Personal Information	34
9	Guides to the PAIA and POPI Acts.....	35
9.1	PAIA Guide of SA Human Rights Commission [Section 51(1) (b)].....	35
10	Appendix	36
10.1	Request form for access to record of private body: Alaris Antennas Form-00105.....	36

		FORM-00105	
REQUEST FOR ACCESS TO RECORD (Section 53(1) of the Promotion of Access to Information Act, 2000), PAIA [Regulation 7]		Ver.2	Date: 2025/10/15
		Updated by:	T Cox
		Approved :	F Havenga
Instructions			
1 TO BE COMPLETED BY THE REQUESTER 2 Proof of identity is required. 3 Type or print in BLOCK LETTERS an answer to every question. 4 If a question does not apply, state "N/A". 5 If there is nothing to disclose in reply to a question, state "nil". 6 When there is insufficient space on a printed form, additional information may be provided on an attached folio, and each answer on such folio must reflect the applicable title. 7 If requests made on behalf of another person, proof of such authorisation, must be attached to this form. 8 Email the completed form to Info.Officer@antennas.alaris.tech .			
Details of Alaris Antennas Information Officer			
Name:	Viktor Marinov		
Physical Address:	1 Travertine Rd, N1 Business Park, Centurion, 0157	Postal Address:	Private Bag X4 The Reeds, Centurion, 0061
Contact Number:	011-034-5300		
Email address	Info.Officer@antennas.alaris.tech		
1 Personal Information			
Mark with an "X"			
<input type="checkbox"/> Request is made in my own name <input type="checkbox"/> Request is made on behalf of another person.			
Full names and surname	-----		
Identity number	-----		
Postal Address	-----		
Residential Address	-----		
Contact numbers	Work:	Cell:	
Email address	-----		
Capacity in which request is made, when made on behalf of another person	-----		
Personal Information of Person on whose behalf request is made (if applicable)			
Full names and surname	-----		
Identity number	-----		

.....	36
10.2 Objection to Processing of Personal Information.....	40
10.3 Request for Correction or Deletion of Personal Information.....	42

		FORM-00107	
REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION IN TERMS OF POPIA (Section 24(1) of the POPI Act, 2013), [Regulations relating to the POPI, 2018; Regulation 3]		Ver.1.1	Date: 2025/10/15
		Created by:	T Cox
		Approved:	F Havenga
Instructions			
<ol style="list-style-type: none"> 1 TO BE COMPLETED BY THE REQUESTER 2 Proof of identity is required. 3 Type or print in BLOCK LETTERS an answer to every question. 4 If a question does not apply, state "N/A". 5 When there is insufficient space on a printed form, additional information may be provided on an attached folio, and each answer on such folio must reflect the applicable title. 6 Affidavits or other documentary evidence as applicable in support of the request may be attached 7 Email the completed form to Info.Officer@antennas.alaris.tech. 			
1 Details of Alaris Antennas Information Officer			
Name:	Viktor Marinov		
Physical Address:	1 Travertine Rd, N1 Business Park, Centurion, 0157		
Postal Address:	Private Bag X4, The Reeds, Centurion, 0061		
Contact Number:	011-034-5300		
Email address	Info.Officer@antennas.alaris.tech		
2 What this request is for			
Please mark the appropriate box with an C			
<input type="checkbox"/>	Correction or deletion of the personal information about the data subject		
<input type="checkbox"/>	Destroying or deletion of a record of personal information about the data subject		
3 Details of Data Subject Requesting Correction or Deletion of Personal Information (if natural person)			
a) The particulars of the person who objects to processing of Personal Information must be given below.			
b) The address and/or fax number in South Africa to which the information is to be sent must be given.			
c) Proof of the capacity in which the request is made, if applicable, must be attached.			
Full names and surname	-----		
Identity number	-----		
Residential Address	-----		
Postal Address	-----		

FORM-00107 Request for Correction or Deletion of Personal Information

P 1 of 2

.....42

1 Alaris Antennas Company Profile

1.1 Company History

From its roots in 1990, Alaris Antennas has grown to become a substantial supplier of advanced Electronic Warfare (EW) antennas. For the global defence and security markets, Alaris Antennas' mission is to deliver high quality antenna Solutions, on time, through technical and service excellence.

We specialize in supplying innovative, customized antennas and related RF product solutions to global RF system integrators.

Alaris Antennas, previously Poynting Defence and Specialised, started as a small consultancy at the University of the Witwatersrand in Johannesburg South Africa, offering antenna and radio frequency (RF) design consulting and antenna placement studies. The company quickly grew into an organisation that designs, develops and manufactures its own world-class custom antenna solutions.

At the end of 2014, Poynting Holdings disposed of its commercial antennas activities and changed its name to Alaris Holdings. Poynting Defence and Specialised accordingly rebranded to Alaris Antennas and operates as a full subsidiary of Alaris Holdings.

1.2 Mission and Vision

Alaris Antenna's mission is to deliver innovative, customised, high quality antenna and related RF product solutions to global RF system integrators speedily through technical and service excellence.

It is our vision to be:

- a global, world class trusted antenna and RF subsystem partner to our customers.
- the global antenna supplier/partner of choice for the defence, security, and telecommunications markets.

For the global defence, security and telecommunications markets, Alaris Antennas delivers on time high quality antenna solutions, offering customisation supported by technical and service excellence, as Alaris Antennas is the trusted and innovative partner to its clients for over a decade.

2 Terminology relevant to PAIA and POPI Acts

PAIA	Promotion of Access to Information Act 2 of 2000 (PAIA).
POPIA	Protection of Personal Information Act 4 of 2013.
IO	Information officer as contemplated in section 1, of the Promotion of Access to Information Act.
DIO	Deputy Information Officer.

access fee	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.
biometrics	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.
competent person	any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child.
consent	any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information.
Constitution	the Constitution of the Republic of South Africa, 1996.
data subject	the person to whom personal information relates.
de-identify	in relation to personal information of a data subject, means to delete any information that: <ul style="list-style-type: none"> • identifies the data subject • can be used or manipulated by a reasonably foreseeable method to identify the data subject or • can be linked by a reasonably foreseeable method to other information that identifies the data subject.
Deputy Information Officer	Person appointed to assist the Information Officer. PAIA does not provide for private bodies to designate a Deputy Information Officer, however, the South African Human Rights Commission recommends that they do so for efficiency and convenience.
direct marketing	to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of: <ul style="list-style-type: none"> • promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject or • requesting the data subject to make a donation of any kind for any reason.
electronic communication	any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient.
filing system	any structured set of personal information, whether centralised, decentralised or dispersed on a functional or geographical basis, which is accessible according to specific criteria.

Form C	This form is used to request access to information held by a private body and can be found in the Appendix of this document and on the South African Human Rights Commission's website.
Information Officer	the person appointed and authorised to implement the POPI Act and handle PAIA requests.
Juristic person	A company or body which is recognised by law as an entity or 'person' having rights and duties.
Minister	the Cabinet member responsible for the administration of justice.
Natural person	A real person, as opposed to a legal or juristic person such as a corporation
operator	a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.
person	a natural person or a juristic person.
personal information	<p>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"> • information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person. • information relating to the education or the medical, financial, criminal or employment history of the person. • any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other assignment to the person. • the biometric information of the person. • the personal opinions, views or preferences of the person. • correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence. • the views or opinions of another individual about the person. and • the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
personnel	<p>any person who</p> <ul style="list-style-type: none"> • works for or provides services to or on behalf of Alaris Antennas and • receives or is entitled to receive any remuneration and • any other person who assists in carrying out or conducting the business of Alaris Antennas <p>This includes directors, all permanent, temporary, and part-time staff as well as consultants and contract workers.</p>
prescribed	prescribed by regulation or by a code of conduct.
private body	Also referred to as a private company or institution. This is a natural or juristic person or partnership who is involved or has been involved in any trade, business, or profession in that capacity

processing	<p>any operation or activity or any set of operations, whether by automatic means or not, concerning personal information, including–</p> <ul style="list-style-type: none"> • the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use. • dissemination by means of transmission, distribution or making available in any other form. or • merging, linking, as well as restriction, degradation, erasure or destruction of information
professional legal adviser	any legally qualified person, whether in private practice or not, who lawfully provides a client, at his or her or its request, with independent, confidential legal advice.
public body	<ul style="list-style-type: none"> • any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government or • any other functionary or institution when (i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution, or (ii) exercising a public power or performing a public function in terms of any legislation.
public record	a record that is accessible in the public domain and which is in the possession of or under the control of a public body, whether or not it was created by that public body.
record	<p>any recorded information</p> <ul style="list-style-type: none"> • regardless of form or medium • in the possession or under the control of a responsible party. • whether or not it was created by a responsible party, and • regardless of when it came into existence.
Regulator	the Information Regulator established in terms of section 39.
re-identify	<p>in relation to personal information of a data subject, means to resurrect any information that has been de-identified, that:</p> <ul style="list-style-type: none"> • identifies the data subject. • can be used or manipulated by a reasonably foreseeable method to identify the data subject, or • can be linked by a reasonably foreseeable method to other information that identifies the data subject, and “re-identified” has a corresponding meaning.
Request fee	The fee to be paid for making a request for access to information.
Requester	The natural or juristic person requesting access to information. A requester also refers to the person making a request on behalf of somebody else.
responsible party	a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.
restriction	to withhold from circulation, use or publication any personal information that forms part of a filing system, but not to delete or destroy such information.
special personal information	<p>personal information as referred to in section 26.</p> <ul style="list-style-type: none"> • the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject, or • the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence, or any

	proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.
Third Party	Any natural or juristic person who is not the requester of the information, nor the body to whom the information request is made.
unique identifier	any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

3 Introduction to the PAIA and POPI Acts

3.1 Background to the promotion of access to information act

When the South African Constitution was being drafted in the early 1990s, various organisations and individuals campaigned for the inclusion of a right of access to information. The vision was that this would ensure transparency and accountability in the actions of both government and private corporations. Providing access to information would remove the likelihood of hiding behind the veil of secrecy.

In 1996, the Constitution of the Republic of South Africa came into force. Section 32 enshrines the right of access to information held by both public and private bodies. Section 32 also states that legislation must be enacted to give effect to the right of access to information by detailing the ways in which information from public and private bodies can be accessed, and by providing grounds on which a public and private body could refuse access to information. In 2000, the Promotion of Access to Information Act (PAIA) came into law, fulfilling the provision of section 32 of the Constitution which requires the enactment of legislation relating to access to information.

The purpose of PAIA is to

- promote the right of access to information,
- to foster a culture of transparency and accountability by giving the right to information that is required for the exercise or protection of any right and
- to promote effective governance, it is necessary to ensure that everyone is empowered and educated to understand their rights in relation to public and private bodies.

Section 9 of the Act recognises that the right to access information should be subject to justifiable limitations, including:

- Limitations aimed at the reasonable protection of privacy, and
- Commercial confidentiality.

In terms of section 51 of the Act, all Private Bodies are required to compile an Information Manual ("PAIA Manual").

3.2 Background to the Protection of Personal Information Act 4 of 2013 (POPIA)

Protection of Personal Information is receiving Global attention. Legislation around this topic exist in Argentina, Australia, Canada, China, Europe (GDPR), Hong Kong, Japan, Mexico, New Zealand, Philippines, Singapore, Turkey, some sectors in USA, Latin American Countries (Habeas Rights), India (PDPB0). This [series of articles](#) (follow link) compare different data protection regulations with GDPR. The POPI Act is based on the first draft of the GDPR and there are many similarities. These articles provide valuable insight into the Data Protection space of our customers.

South Africa's own Data Protection statute (POPIA) effectively come into operation on 1 July 2020. All organisations and individuals processing personal information in South Africa had to be in full compliance with the Act by 30 June 2021.

The legislation demands that organisations implement strict data processing standards to ensure the **privacy** and **security of personal information**. Personal Information is detailed in section 2, Terminology relevant to PAIA and POPIA.

The purpose of the POPI Act (<http://www.popia.co.za>) is to

- give effect to the constitutional right to privacy, by safeguarding personal information when processed by a responsible party. This is subject to justifiable limitations.
- regulate the manner in which personal information may be processed.
- provide persons with rights and remedies to protect their personal information from processing that is not in accordance with this Act.
- establish an Information Regulator, to promote, enforce and fulfil the rights protected by this Act.

The purpose of the POPI Act therefor is to ensure that institutions and individuals conduct themselves responsibly when collecting, processing, storing, and sharing another person's or entity's personal information. It is designed to prevent the negligent disclosure of personal information.

This means that an organisation or responsible party must determine the purpose and means for the collection and processing of personal information in their possession - it must be done for a specific, explicitly defined, and lawful purpose related to the function or activity of the responsible party. It can also generally only capture, use and store personal information with express and informed consent by the data subject (unless otherwise permitted in terms of the Act).

In order to achieve these objectives, an [Information Regulator](#) has been established that is empowered to monitor and enforce compliance with the Act.

POPI provides that the Company appoints an Information Officer (IO) who must be registered with the Regulator and will be the liaison between the organisation and the Regulator. The IO is also responsible for compliance and for dealing with requests for information (PAIA). There is provision for deputy IO's to be appointed / designated. The POPIA also prescribes mandatory notification protocols in the case of data breaches.

3.3 Purpose of the PAIA and POPIA Manual

This PAIA and POPIA Manual provides the details of the appointed Information Officer and provides an outline of the type of records and the personal information Alaris Antennas holds. This manual further explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (PAIA).

The PAIA gives effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights.

Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and fees are dealt with in paragraphs 6 and 7 of the Act.

Refer to par 7.3 in this manual for more info on Fees payable for access to information and Appendix A for the Form to use to request access to information.

In addition, this manual explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (POPIA).

3.4 Availability of the PAIA and POPIA Manual

This PAIA and POPIA Manual is available:

- on request from the Information Officer. Send an Email to info.officer@antennas.alaris.tech

This Manual will be updated from time to time, as and when required.

4 Details in terms of the section 51 PAIA manual

4.1 Company Details

Company Name:	Alaris Antennas
Company Registration Number	2013/048197/07
Physical Address	1 Travertine Avenue, N1 Business Park, Centurion, 0157
Postal Address:	Private Bag X4 The Reeds, 0061
Contact Number:	(011) - 034 5300
Website:	www.alarisantennas.com

4.2 Contact Details of Alaris Antennas Managing Director [Section 51(1)(a)]

Managing Director:	Gisela Heyman
Contact Number:	(011) - 034 5302
Email:	gisela.heyman@antennas.alaris.tech

4.3 Alaris Antennas Information officer [Section 51(1)(b)]

The Promotion of Access to Information Act (PAIA) prescribes the appointment of an Information Officer. The Information Officer oversees the functions and responsibilities as required in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information (POPI) Act 4 of 2013 after registering with the Information Regulator.

The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013.

Contact Details of the Alaris Information Officer

Managing Director:	Gisela Heyman
Contact Number:	(011) - 034 5302
Email:	Info.Officer@antennas.alaris.tech

Contact Details of the Alaris Deputy Information Officers

Deputy Information Officer:	Viktor Marinov
Contact Number:	011-034-5357
Email:	Info.Officer@antennas.alaris.tech

Deputy Information Officer:	Trudi Cox
Contact Number:	011-034-5374
Email:	Info.Officer@antennas.alaris.tech

5 Records held by Alaris Antennas

5.1.1 Classification of our Data

While various standards such as ISO27001 refer to classification of data, they are not prescriptive, and we may define our own categories.

I have listed a few standard categories.

1. Unclassified / Available (U)
2. Restricted (R)
3. Confidential (C)
4. Secret /classified (S)
5. Personal Information (P)
6. Special Personal Information (SP)

5.1.1.1 Unclassified / Available Information (U)

This information is typically freely available on our website but might be subject to copyright.

5.1.1.2 Restricted information (R)

Restricted information is often available internally but should not get out into the public space or to clients. This often relates to “work in progress” communications. This could be made available on request with the provision of a signed NDA in place.

5.1.1.3 Confidential Information (C)

Confidential Information might relate to an agreement with a client or to company “trade secrets”. This information could be damaging to the business if it were leaked, either affecting competitiveness or opening the door for legal action. Here too this could possibly be made available on request with the provision of a signed NDA in place.

5.1.1.4 Secret / Classified INFORMATION (S)

Only select staff members have access to this information. This could be related to research and development, as well as sensitive legal issues. Classified information is generally seen as information that is governed by law or regulation.

5.1.1.5 Personal Information (P)

Personal Information can identify an individual and includes:

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

Note that personal Information as defined by the POPI Act also applies to a company or body which is recognised by law as an entity or 'person' having rights and duties.

5.1.1.6 Special Personal Information (SP)

Special Personal Information can be or has been used to discriminate against individuals. This includes:

- religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject, or
- the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence, or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

In general, you would need additional consent to process this kind of information if it is not required by law for you to process.

5.1.2 Records automatically available (Unclassified)

Records automatically available for inspection, purchase or photocopying **without having to be requested** in terms of the act include:

- Newsletters
- Blog Articles
- Product Information
- Brochures
- Return Material Authorisation Policy
- General Terms and Conditions of Sale
- Latest Patent details
- Reports of a public nature (such as our published financial reports)
- Other information intended for public viewing

These records are typically available on the company website.

5.1.3 Records available in terms of legislation [Section 51(1)(d)]

Information is available in terms of the following legislation to the persons or entities specified in such legislation. The specific protections offered by such laws applies.

Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of the PAIA and POPI acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act.

A request to access must be done in accordance with the prescriptions of the Act as described in this manual. Refer to Section 7.

We attempted to supply a complete list of applicable legislation:

- Basic Conditions of Employment Act 75 of 1997
- Broad-based Black Economic Empowerment Act 53 of 2003
- Close Corporations Act 69 of 1984
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Constitution of South Africa Act 108 of 1996
- Copyright Act, No 98 of 1987
- Customs & Excise Act, 91 of 1964
- Electronic Communications Act 36 of 2005
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962

- Labour Relations Act 66 of 1995
- National Conventional Arms Control Act, No 41 of 2002
- National Conventional Arms Control Amendment Act, No 73 of 2008
- Occupational Health & Safety Act 85 of 1993
- Patents Act 57 of 1987
- Pension Funds Act, 1956
- Promotion of Access to Information Act, No 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protection of Personal Information Act, No. 4 of 2013
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Unemployment Insurance Act 30 of 1966
- Unemployment Insurance Act Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

5.1.4 Company Records available on request

It should be noted that publication of this Manual and describing the categories and subject matter of information held, does not give rise to any rights to access such information or records.

Alaris Antennas will evaluate and consider all requests for access to information in accordance with the Act. Section 7 provides detail on how to request access to information.

We maintain records on the following categories and subject matters.

Department / Category	Subject Matter / Records	Classification
Company Records	• Public Corporate records	U
	• Memorandum of Incorporation	R
	• Minutes of Board Meetings	C
	• Proxy Forms	C
	• Register of directors' shareholdings	U
	• Share register and other statutory registers	U
	• Patents and Intellectual property records	U
	• Trade Mark documents	U
	• Confidentiality & Non- Disclosure agreements	C

Department / Category	Subject Matter / Records	Classification
	• Records relating to the appointment of Auditors, Directors, Secretary	U
	• ManCo meeting minutes	C
	• Corporate structure documents	C
	• Corporate Social Responsibility schedule of projects / record of organisations that received funding	U
Alaris Public Relations	• Weekly Wrap	C
	• Blog articles	U
	• Newsletters	U
	• Media releases	U
Tax Records	• Alaris Income tax returns,	S
	• PAYE	S
	• VAT	S
	• SDL	S
	• UIF	S
	• Workman's compensation	S
	• IRP5s & records of payments to SARS on behalf of employees	S
Finance	• Annual Financial statements	C
	• Accounting records	C
	• bank records	S
Finance	• Asset register	C
	• rental agreements	C
	• invoices and statements	C
	• Debtors / Creditors statements and invoices	C
	• General reconciliation	C
Sales and Marketing	• Market Information	C
	• Product Sales Records	C
	• Marketing Strategies	C
	• Customer Database	C
	• Customer buying habits, historic transactions	C
	• RMA (Return Materials Authorisation) policy	U
	• Warranty policy	U
	• Terms and conditions of sale	U
	• Client correspondence	C
	• Client contracts and legal documentation	C
	• Client business information	C

Department / Category	Subject Matter / Records	Classification
	<ul style="list-style-type: none"> • Proposal and tender documents 	C
Human Resources	<ul style="list-style-type: none"> • Personnel Records 	S
	<ul style="list-style-type: none"> • Employment Contracts 	S
	<ul style="list-style-type: none"> • Employee medical records 	S
	<ul style="list-style-type: none"> • Employee disability records 	S
	<ul style="list-style-type: none"> • Medical Aid records 	S
	<ul style="list-style-type: none"> • Pension Fund records 	S
	<ul style="list-style-type: none"> • Payroll records (Salary and Leave records) 	S
	<ul style="list-style-type: none"> • Recruitment records 	S
	<ul style="list-style-type: none"> • Training Records & Training Material 	C
	<ul style="list-style-type: none"> • Any personal records provided by employees 	S
	<ul style="list-style-type: none"> • Employee benefits arrangements and records 	S
	<ul style="list-style-type: none"> • Standard letters and notices 	C
Human Resources	<ul style="list-style-type: none"> • Any records a third party has provided about any of their personnel 	S
	<ul style="list-style-type: none"> • Conditions of employment and other personnel-related contractual and quasi-legal records 	C
	<ul style="list-style-type: none"> • Employment policies and procedures 	C
	<ul style="list-style-type: none"> • Internal evaluation records & Performance management records 	S
	<ul style="list-style-type: none"> • Disciplinary records 	S
	<ul style="list-style-type: none"> • BEE statistics 	C
	<ul style="list-style-type: none"> • Career development records 	S
	<ul style="list-style-type: none"> • Employment equity reports 	C
	<ul style="list-style-type: none"> • Leave records. 	C
	<ul style="list-style-type: none"> • Retirement benefits 	C
	<ul style="list-style-type: none"> • Other internal records and correspondence. 	S
	<ul style="list-style-type: none"> • Workplace and Union agreements and records 	S
Product Development / Engineering	<ul style="list-style-type: none"> • Intellectual property 	R
	<ul style="list-style-type: none"> • Product Development records 	R
	<ul style="list-style-type: none"> • Project plans 	R
	<ul style="list-style-type: none"> • Risk management records 	R
	<ul style="list-style-type: none"> • Problem Solution Methodologies 	R

Department / Category	Subject Matter / Records	Classification
	• Design records	C
	• Minutes of meetings	R
	• Records of Communications with clients	R
Configuration Management	• BOMS & Drawings	C / R ?
	• Technical Reference Manual	C
	• Acceptance Test Document	C
	• Qualification Test Plans and Results	R
	• Technical Reference Manuals	C
	• Client CAD	C
Procurement	• Supplier records	C
	• Supplier pricing	C
	• Standard Terms and Conditions for supply of services and products	U
	• Contractor, client and supplier agreements	C
	• Lists of suppliers, products, services and distribution	C
	• Purchase Orders	C
Shipping	• Freight Forwarder records	C
	• Customer details and	C
	• Delivery addresses	C
	• EUR 1s	C
Arms Control	• Registers	C
	• Export Permit records	C
	• Import Permit records	C
	• Temporary Permits	C
	• Contracting Permits	C
	• Registration Certificates	C
	• Marketing Permit	C
	• End User Certificates	C
	• Trade Control Classification Declarations	C
	• Communications with DCAC	C
Quality and Testing	• IQC records	U
	• Test results for all Antennas produced	C
	• RMA (Return Materials Authorisation) data	R
	• Company policies and procedures	C
	• Health and Safety records	C

Department / Category	Subject Matter / Records	Classification
	• Legal Compliance Records	U
Other Operational Records	• Internal correspondence	C
	• Minutes of meetings	C
	• Insurance Documentation	C
	• Service Level Agreements	C
	• Travel documentation	C
	• Order books	C
	• Vehicle registration documents	C
	• Access Control Records	C
	• IT Records & passwords	S

6 Processing of Personal Information

6.1 The 8 Conditions or Principles of POPIA

Processing of Personal Information is to be done in accordance with the following 8 conditions or principles as outlined in the act. This was concisely summarised from the act by [Ross & Saunders](#).

The conditions seem daunting, but in essence they are just guidelines of doing good, honest business. There is a lot of work involved in getting initial compliance going, but once it is in place, it comes down to maintenance.

6.1.1 Accountability

We need to be accountable for the personal information that we are processing. We need to have records available to prove that we are complying. This includes policies, procedures, and records that show that we have an effective compliance programme in place.

6.1.2 Processing Limitation

We need to process data in accordance with relevant laws. We need to process ONLY the information needed to meet the defined purpose. Example: If we need an email address

and name for our blog article going out, we are not allowed to also collect a phone number and postal address.

This condition also refers to consent and justification. There are several justified means of which data may be processed, above and beyond consent. These may be in terms of a contract, legitimate interest as a business, or to comply with other legal obligations such as Economic Equity law.

6.1.3 Purpose Specification

The information must be collected for a specific purpose, which is properly defined and for legitimate reasons. It may not be kept for longer than is necessary.

6.1.4 Further Processing Limitation

Information may only be processed for the initial purpose. There are exceptions, such as for legal action, crime prevention, and compliance with tax. In general information cannot be used for something new without interaction with the data subjects (people to whom the data belongs).

6.1.5 Information Quality

Information collected needs to be up-to-date, complete, and accurate. This points to keeping employee records, mailing lists, customer databases, supplier databases etc. clean and current. This may involve allowing customers to update their own information periodically or by sending out regular update requests.

6.1.6 Openness

Documentation of processing activities need to be maintained in terms of PAIA section 52. This includes the PAIA manual, and, a Record of Processing Activities, or ROPA should be considered.

This condition also goes into providing notice to data subjects, to ensure that they are aware of processing – particularly if we have collected information from a source other than directly from the data subject.

6.1.7 Security Safeguards

This condition firstly deals with integrity and confidentiality of information. Technical safeguards and processes are needed to ensure that information is not leaked (breach of confidentiality) or deleted/modified (breach of integrity). This includes firewalls, antivirus tools, safes, strongrooms, access control and more.

Next, the act talks about making sure that outsourced providers such as payroll and IT and marketing agents are processing data with our knowledge and under our instruction. They must also treat the information with the same care that we do, and they must have security safeguards in place too.

Lastly it deals with breach notifications, where our outsourced providers need to notify us, and we need to notify the regulator when a breach occurs. It also details how and when we need to notify people whose data has been breached. We need a defined incident response plan.

6.1.8 Data Subject Participation

Data subject participation refers to people having access to their information, as well as being allowed to correct their information. People need to be informed of what information we have of theirs, what we are doing with it, and who we may have shared it with. This is where a Record of Processing Activities can come in handy.

Under any conditions of information being inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained illegally, the data subject has the right to request correction or deletion. It also becomes our responsibility to ensure that the same request filters down to any subcontractors or outsourced data processors in the chain.

6.2 Data Privacy Rights

This was found to provide a good summary of the rights of any individual or company under the POPI Act.

- ✓ You have the right to remain private.
- ✓ You have the right to have your data remain private.
- ✓ Anything you say can and will be used against you in the court of public opinion, BUT your personal information should remain private.

- ✓ You have the rights to consult and engage privacy settings to ensure your personal information is protected by adequate safeguards.
- ✓ You have the right to be protected by privacy settings configured by you for your online accounts and digital information.
- ✓ You have the right to opt out of the sale of your personal information to third parties without your knowledge and consent.
- ✓ You have the right to have your personal information deleted at your request.
- ✓ You have the right to be notified where, when, and how your data is being used, and for what purposes.
- ✓ Your personal data is yours and yours alone.

6.3 Purpose of the Processing of Personal Information

Section 11(1)a of POPIA lists a number of legitimate justifications for processing data, only one of which is consent. Here's a breakdown and some examples of what the section lays out as summarised by ROSS&SAUNDERS.

6.3.1 Consent

"the data subject or a competent person where the data subject is a child consents to the processing"

This is the easy one that everyone is most familiar with. "I give you explicit permission to use my information, or you aren't allowed to use it." This is generally a good idea for direct marketing, where a member of the public is signing up to a database or list. This is, however, a bad idea in terms of processing once you've entered into a contract or agreement.

While POPIA isn't as explicit about it, GDPR (Europe's privacy law) basically says that by nature of being able to give consent, you are able to revoke consent. And if someone revokes consent for a contract that needs to be performed, suddenly you can't perform what you were hired to do! And then you end up with a horrible, sticky, catch-22 situation.

6.3.2 Contract

"processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party"

If there's a business agreement, the parties entering into it can agree to what is going to be processed (and why) as part of the delivery and conclusion of the contract. If you take an employment agreement into consideration - in order to pay a person's salary, fulfil tax

obligations and so on - you need to process certain information. If this relied on consent and the employee withdrew it, how could you pay them? Contracting means that this stickiness described is removed.

6.3.3 Legal Obligation

“processing complies with an obligation imposed by law on the responsible party”

This is where processing certain pieces of information is required by another law out there. A good example of this with regards to employment is Employment Equity (EE) regulations. Equity committees are required to process race information according to the Employment Equity Act.

6.3.4 Legitimate Interest of data subject

“processing protects a legitimate interest of the data subject”

This is where processing is in the interest of the data subject, where consent or contract is not being used. Cliffe Dekker Hofmeyr mention an example that it may be in the legitimate interest of a customer to process their data in order to give them a tailored experience in their favour.

6.3.5 Legitimate interest of a business

“processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied”

Much like legitimate interest in terms of a subject, legitimate interest in terms of a business refers to processing where you need to justify why you're processing someone's information and not using consent or a contract. An example here can be collections of fees where someone has defaulted.

Legitimate interest is a method that may be used to justify why any of the other justifications for processing (consent, contract etc) were not used. The general view from attorneys is to “proceed with caution” when using this approach. The GDPR has a 3-way test for legitimate interest that speaks to the purpose of the processing, the necessity of it, and whether the processing outweighs the rights of the data subject. The right to privacy is in the South African Bill of Rights, and therefore if we do look to Europe for guidance on this particular issue - we may find it harder to justify than expected.

6.4 Purpose of processing of Personal Information by Alaris Antennas

Alaris Antennas processes personal information for a variety of purposes, including:

- to provide or manage any information, products and/or services requested by customers, suppliers or employees or any other relevant data subjects
- maintain customer, supplier or employee records
- for recruitment purposes
- for employment purposes
- for general administration, financial and tax purposes
- for legal purposes
- for contractual purposes
- for health and safety purposes
- to monitor access, secure and manage our premises and facilities
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services

6.5 Categories of data subjects and personal information processed by Alaris Antennas

Categories of Data Subjects	Personal Information Processed
Customers and Potential Customers	<ul style="list-style-type: none"> • Name (first and surname) • Email address • Country • Company • Company Address • Telephone number
Suppliers	<ul style="list-style-type: none"> • Name (first and surname) • Email address • Country • Company • Company Address • Telephone number • Products or services supplied
Employees	<ul style="list-style-type: none"> • Full Name • Identity or Passport Number • Date of Birth • Primary Skills

Categories of Data Subjects	Personal Information Processed
	<ul style="list-style-type: none"> • Mobile / Cell Number • Physical Address • Postal Address • Email addresses • Race • Disabilities (if any) • Medical Aid Number • Emergency Contact Information • Marital Status • Spouse Name • Number of Dependents • Income Tax Number • Banking Details • Salary Information
Job Applicants	<ul style="list-style-type: none"> • Full Name • Identity or Passport Number • Date of Birth • Primary Skills • Mobile / Cell Number • Physical Address • Postal Address • Email addresses • Race • Disabilities (if any) • Salary Information
Visitors to Alaris Antennas	<ul style="list-style-type: none"> • Name of Visitor • Company Name • Signature

6.6 Sharing of Personal Information

As Alaris Antennas is part of Alaris Holdings and as such has sister companies in Finland, USA, and UK there is the possibility of data being shared across these companies.

The Weekly Wrap is a Company Confidential newsletter and may contain news and photos identifying members of staff and company products.

We do not share the personal information of employees, customers, or suppliers with any other third parties, unless

- we are obliged to provide such information for legal or regulatory purposes.

- we are required to do so for purposes of existing or future legal proceedings,
- they perform services and process personal information on our behalf

We will only disclose personal information to government authorities if we are required to do so by law.

Our employees, other companies under the Alaris Holdings umbrella, our agents/dealers and their employees, our service providers, and our suppliers, are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

6.7 Measures to protect personal information

We take care to implement reasonable technical and organisational measures for the protection of our personal information against unauthorised access and manipulation as well as data loss or destruction of accidental or deliberate nature.

Hardcopies of Employee data are kept safe in a locked cabinet in a locked room.

Our operators and service providers that process personal information are also mandated by contract and/or service level agreements to ensure that they apply adequate safeguards to protect our data.

6.8 Trans-border flow of personal information

Alaris Antennas is part of a multinational company, as such it is foreseeable that personal information may be transferred across South African borders. In conformance to section 72 of POPIA this will be done in accordance with legislative requirements and be limited to cases where:

- The data Subject consents to the transfer of their Personal Information, or
- Transfer is necessary for the performance of a contractual obligation between the Data Subject and Alaris Antennas, or
- Transfer is necessary for the performance of a contractual obligation between Alaris Antennas and a third party, in the interests of the Data Subject, or
- The transfer is for the benefit of the Data Subject, and if it were reasonably practicable to obtain the consent of the Data Subject, the Data Subject, would likely provide such consent.

We will take steps to ensure that operators processing personal information outside of South Africa, apply adequate safeguards.

6.9 Alaris Antennas DATA privacy policy

Alaris Antennas has a Data Privacy Policy in place, available

- at "P:\QUALITY\COMPANY INFO\QMS Current Documents\Alaris Company Documents\00 PAIA and POPIA docs" or
- just follow the link to [Alaris PAIA and POPIA docs](#) and
- from our Information Officer (info.officer@antennas.alaris.tech).

Alaris Antennas has an Employee Privacy Notice in which personal information processed by Alaris is listed as well as the purpose for processing this data.

Employees were asked to sign this Employee Privacy Notice in agreement that their personal data can be used as outlined.

Employees are encouraged to review their personal data to ensure that it is current.

6.10 Data/Information Security

Security measures must be adhered to both for physical data/information and electronic information.

Alaris Antennas have implemented access control to our buildings. We keep Physical Employee data, Financial Records and Arms Control Files in locked areas.

6.11 POPIA Incidence Response Plan

Although data breaches are nothing new, this topic has received more focus recently with stricter data protection laws and regulations.

Alaris Antennas is working on a formal Incidence Response Plan as is required by the Information Regulator.

Our Incidence Response plan deals with data breaches or security compromises of personal information. This plan contains:

- Purpose of the plan
- Identification of a data breach or a security compromise
- Operational contingencies in place to ensure business continuity if our systems are hijacked in a ransomware attack?
- Identification of risk for each data category (financial- and reputational exposure) and how to address and minimise this.
- The legal notifications and reporting requirements of a data breach

All employees must be trained and need to know:

- What to do if you mistakenly sent a confidential email to the wrong recipient
- What to do if you clicked on a phishing email?

This document will be available at

- "P:\QUALITY\COMPANY INFO\QMS Current Documents\Alaris Company Documents\00 PAIA and POPIA docs" or
- just follow the link to [Alaris PAIA and POPIA docs](#) and
- from our Information Officer (info.officer@antennas.alaris.tech).

7 How to request Information

7.1 Procedure to request Information in terms of PAIA

All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act. There may be applicable grounds of refusal of such a request, as set out in the Act and par 7.2.2.

Please note further that many of the records held by us are those of third parties, such as clients and employees, and we take the protection of third-party confidential information very seriously. Many of the records held are confidential and others are the property of the client and not of Alaris Antennas. Requests for access to these records will be considered very carefully. We will have to obtain consent from the owners of records belonging to clients before access can be considered. Please ensure that requests for such records are carefully motivated.

Requests for access to records held by *Alaris Antennas* must be made on the request form (Form-00105) that is included in the appendix of this Manual. These requests must be submitted to our Information Officer using the contact details provided.

The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required (inspection of copy, paper copy, electronic copy, transcript, etc.)

It is vital that the requester identifies the right that he or she is seeking to exercise or protect and provides an explanation of why the requested record is required for the exercise or protection of that right.

If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of our Information Officer.

The Information Officer will process the request and notify the requester of the applicable access fee to be paid upon access and the procedures to be followed.

If a person needs assistance in this process, he/she should contact the Information Officer or Deputy Information Officer to solicit the necessary assistance.

7.2 Duties of the Information Officer in this process (taken from PAIA Guide of SA Human Rights Commission)

7.2.1 Process request for access

It is the responsibility of the Information Officer to grant or deny access to the records. This decision must be put to the requester in writing.

When a PAIA request is granted:

- the Information Officer must notify the requester of the form in which access will be given and of
- the amount of the access fee, which must be paid once access has been given.
- the notice must also inform the requester that he/she has the right to lodge an application to court against the access fee or against the form in which access will be granted.
- the notice must also provide information about the time within which an appeal or court application must be filed as well as the procedure that must be followed.

If a PAIA request is denied:

- the notice to the requester must state the reasons for refusal, which must be supported by the relevant provisions of PAIA.
- As with the form of access and amount of access fees, the notice must provide the requester with information regarding his/her right to file an application in court.

The Information Officer may decide to defer the release of a record to a requester in terms of Section 24 of PAIA if that record is intended to be published within 90 days or if the record is required by law to be published but is yet to be.

PAIA states in Section 55 that if an Information Officer is unable to find the records requested, or it is believed that they do not exist, the Information Officer must, after ensuring that all reasonable steps have been located to find the record, submit a detailed affidavit to the requester giving notice that the records in question do not exist or cannot be found.

7.2.2 Grounds for refusing access to information

These grounds are listed in PAIA Chapter 4, part 3:

- Protection of privacy of a third party who is a natural person.
- Protection of confidential information
- Protection of safety of individuals, and protection of property
- Protection of information in legal proceedings. This includes request after commencement of legal proceedings.
- Protection of commercial information (company and / or third party)
- Protection of research information (company and / or third party)

The IO may refuse access to information if they can justify that the information in question falls within the following categories and is not in the public interest to disclose:

- SA's defence, security, and international relations
- Economic, financial, and commercial interest of South Africa
- Operations of public bodies
- "Manifestly frivolous requests, or substantial and unreasonable diversion of resources"

7.2.3 When access may not be refused

It is important to note that all the protections afforded to information as detailed above falls away if the release of the information is in the public interest. The public interest test overrides all the other grounds of refusal of access to information. If these conditions are met, then the information must be disclosed on the grounds of public interest.

- Does the information demonstrate a serious breach of a law? OR
- Do the records in question contain information relating to an imminent and serious public safety or environmental risk? AND
- Does the public interest in disclosing the information clearly outweigh the potential harm?

7.2.4 Response time to request

The Information Officer must respond to a PAIA request within 30 days after receiving the request. The Information Officer may request an extension for a period of no more than 30 additional days for specific reasons, which include the request involving:

- a large volume of documents,
- consultation with other public or private entities,

Only one extension is allowed per PAIA request.

7.3 Fees Relevant to Information Requests

Fees may be payable. These fees are prescribed by law and can change from time to time. Fees include reproduction cost and the cost for search and preparation of the record for disclosure.

REQUESTER FEE:

- A Requester fee of R50 is payable for all non-personal requests. In the case where a requester seeks access to a personal record of him/herself, this fee need not be paid.
- This requester fee is payable BEFORE a request will be processed.

ACCESS FEES IN RESPECT OF PRIVATE BODIES

- Access Fees are payable if the request for access is granted.
- If the preparation of the record requested requires more than six hours, a deposit of one third of the access fee is payable.
- A requestor may lodge an application with a court against the payment of the request fee and/or deposit.
- Records may be withheld until the fees have been paid.
- The actual postage is payable when a copy of a record must be posted to a requester.

Ref	Activity	Fee
1	For every photocopy of an A4-size page or part thereof	R 1,10
2	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R 0.75
3	For a copy in a computer-readable form on (CD)	R 70.00
4	For a transcription of visual images, for an A4-size page or part thereof	R 40.00
5	For a copy of visual images	R 60.00
6	For a transcription of an audio record, for an A4-size page or part thereof	R 20.00
7	For a copy of an audio record	R 30.00
8	Search and preparation of the record for disclosure (per hour or part thereof, excluding the first hour)	R30.00
9	Postage / delivery fees when applicable	Cost

7.4 Legal Recourse

When a requester is not satisfied by a decision:

- for refusing access,
- for imposing access fees, or
- for extending the time in which the response is due,

Then the requester may apply to court for relief within 180 days of receiving the decision that has caused the grievance. This decision will be reviewed by a court and a decision will be made by the courts as to whether to provide access to the requested records.

8 How to request changes to Personal Data and processing thereof

8.1 objecting to processing of Personal Information by a data subject

Section 11 (3) of POPI and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time, object to the Processing of own Personal Information. This is subject to exceptions contained in POPIA.

Use the relevant form in the appendix of this manual. (Form-00106) Complete the form and submit it to the Alaris Antennas Information Officer.

The request will be processed and the requested will be informed of the outcome.

8.2 Request for correction or deletion of Personal Information

Section 24 of POPI and regulation 3 of the POPI Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted. This is subject to exceptions contained in POPIA.

A deletion request cannot be honoured when Alaris Antennas is required by law to keep that information. For example, If someone requests that all their information that Alaris Antennas ever had be deleted, but Alaris Antennas has invoiced them and requires the information for SARS, deletion of information is NOT possible. The request will be denied and an explanation will be provided to the requester.

Use the relevant form in the appendix of this manual for this request. (Form-00107) Complete the form and submit it to the Alaris Antennas Information Officer. The request will be processed and the requested will be informed of the outcome.

9 Guides to the PAIA and POPI Acts

9.1 PAIA Guide of SA Human Rights Commission [Section 51(1) (b)]

The South African Human Rights Commission (SAHRC) is mandated under PAIA to:

- Promote the right of access to information.
- Monitor the implementation of PAIA by public and private bodies.
- Make recommendations to strengthen the PAIA.
- Report annually to Parliament

Requesters are referred to the [PAIA GUIDE](#) in terms of Section 10 which has been compiled by the South African Human Rights Commission (SAHRC). Refer to their website at <http://www.sahrc.org.za>


The POPI (Protection of Personal Information) Act 4 of 2013 amends PAIA in several ways. One of the keys ways in which POPIA changes PAIA relates to the role of the SAHRC. Under POPIA the SAHRC's functions in terms of PAIA are transferred to the Information Regulator, a new independent body which are set up:

- to monitor both POPIA and PAIA, and
- to handle complaints relating to access to information and the protection of personal information.

The SAHRC however retains its Constitutional obligation to promote, protect and monitor the right of access to information as a right enshrined in the Bill of Rights.

10 Appendix

10.1 Request form for access to record of private body: Alaris Antennas Form-00105

		FORM-00105	
REQUEST FOR ACCESS TO RECORD (Section 53(1) of the Promotion of Access to Information Act, 2000), PAIA [Regulation 7]		Ver.2	Date: 2025/10/15
		Updated by:	T Cox
		Approved:	F Havenga
Instructions			
<ol style="list-style-type: none"> 1 TO BE COMPLETED BY THE REQUESTER 2 Proof of identity is required. 3 Type or print in BLOCK LETTERS an answer to every question. 4 If a question does not apply, state "N/A". 5 If there is nothing to disclose in reply to a question, state "nil". 6 When there is insufficient space on a printed form, additional information may be provided on an attached folio, and each answer on such folio must reflect the applicable title. 7 If requests made on behalf of another person, proof of such authorisation, must be attached to this form. 8 Email the completed form to Info.Officer@antennas.alaris.tech. 			
Details of Alaris Antennas Information Officer			
Name:	Viktor Marinov		
Physical Address:	1 Travertine Rd, N1 Business Park, Centurion, 0157	Postal Address:	Private Bag X4 The Reeds, Centurion, 0061
Contact Number:	011-034-5300		
Email address	Info.Officer@antennas.alaris.tech		
1 Personal Information			
Mark with an "X"			
<input type="checkbox"/> Request is made in my own name <input type="checkbox"/> Request is made on behalf of another person.			
Full names and surname	-----		
Identity number	-----		
Postal Address	-----		
Residential Address	-----		
Contact numbers	Work:	Cell:	
Email address	-----		
Capacity in which request is made, when made on behalf of another person	-----		
Personal Information of Person on whose behalf request is made (if applicable)			
Full names and surname	-----		
Identity number	-----		

Postal Address	-----	
Residential Address	-----	
Contact numbers	Work: -----	Cell: -----
Email address	-----	

2 Details of Record requested

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 page and attach it to this form. All additional pages must be signed.)

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record:

3 Type of Record and Form of access to record

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 under certain circumstances. In such a case you will be informed whether 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

1. If the record is in written or printed form:	Copy of a record	<input type="checkbox"/>
	Inspection of a record	<input type="checkbox"/>
2. If the record consists of visual images: (photographs, slides, video recordings, computer-generated images, sketches, etc)	View images or copy of the images	<input type="checkbox"/>
	Copy of the images *	<input type="checkbox"/>
	Transcription of the images	<input type="checkbox"/>
3. If the record consists of recorded information that can be reproduced in sound:	listen to the soundtrack	<input type="checkbox"/>
	transcription of soundtrack *	<input type="checkbox"/>

4. If record is held on computer or in an electronic or machine-readable form	printed copy of record*	
	printed copy of information derived from record* or in computer readable form*	
*How do you wish the copy or transcription to be made accessible to you?	Copy of record on flash drive	
	Copy of record saved on cloud storage server	
4 Manner of Access		
(Mark the applicable box with an "X")		
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)		
Postal services to postal address		
Postal services to street address		
Courier service to street address		
Facsimile of information in written or printed format (including transcriptions)		
E-mail of information (including soundtracks if possible)		
Cloud share/file transfer		
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)		
5 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:		
6 Fees		
a) A request fee must be paid before the request will be considered.		
b) You will be notified of the amount of the access fee to be paid.		
c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.		
d) If you qualify for exemption of the payment of any fee, please state the reason for exemption		



Reason for exemption from payment of fees:

7 Notice of decision regarding request for access

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any.

Please indicate your preferred manner of correspondence:

Postal Address

Facsimile

Electronic Communication


Signed at _____ on this _____ day of _____ 20 _____.

Signature of requester / person on whose behalf the request is made.


FOR OFFICIAL USE	
Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

10.2 Objection to Processing of Personal Information

 <p>ALARIS ANTENNAS INSPIRING THE NEXT RF SOLUTION</p>		FORM-00106	
<p>OBJECTION TO PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPI Act (Section 11(3) of the POPI Act, 2013), [Regulations relating to the POPI, 2018]</p>		Ver.1.1	Date: 2025/10/15
		Created by:	T Cox
		Approved :	F Havenga
Instructions			
<ol style="list-style-type: none"> 1 TO BE COMPLETED BY THE PERSON voicing the OBJECTION 2 Proof of identity is required. 3 Type or print in BLOCK LETTERS an answer to every question. 4 If a question does not apply, state "N/A". 5 When there is insufficient space on a printed form, additional information may be provided on an attached folio, and each answer on such folio must reflect the applicable title. 6 Affidavits or other documentary evidence as applicable in support of the objection may be attached 7 Email the completed form to Info.Officer@antennas.alaris.tech. 			
1 Details of Alaris Antennas Information Officer			
Name:	Viktor Marinov		
Physical Address:	1 Travertine Rd, N1 Business Park, Centurion, 0157		
Postal Address:	Private Bag X4, The Reeds, Centurion, 0061		
Contact Number:	011-034-5300		
Email address	Info.Officer@antennas.alaris.tech		
2 Details of Data Subject Objecting to Processing of Personal Information (if natural person)			
<ol style="list-style-type: none"> a) The particulars of the person who objects to processing of Personal Information must be given below. b) The address and/or fax number in South Africa to which the information is to be sent must be given. c) Proof of the capacity in which the request is made, if applicable, must be attached. 			
Full names and surname			
Identity number			
Residential Address			
Postal Address			
Telephone number			
Email address			
Capacity in which request is made, when made on			

10.3 Request for Correction or Deletion of Personal Information

 ALARIS ANTENNAS INSPIRING THE NEXT RF SOLUTION		FORM-00107	
REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION IN TERMS OF POPIA (Section 24(1) of the POPI Act, 2013), [Regulations relating to the POPI, 2018; Regulation 3]		Ver.1.1	Date: 2025/10/15
		Created by:	T Cox
		Approved :	F Havenga
Instructions			
<ol style="list-style-type: none"> 1 TO BE COMPLETED BY THE REQUESTER 2 Proof of identity is required. 3 Type or print in BLOCK LETTERS an answer to every question. 4 If a question does not apply, state "N/A". 5 When there is insufficient space on a printed form, additional information may be provided on an attached folio, and each answer on such folio must reflect the applicable title. 6 Affidavits or other documentary evidence as applicable in support of the request may be attached 7 Email the completed form to Info.Officer@antennas.alaris.tech. 			
1 Details of Alaris Antennas Information Officer			
Name:	Viktor Marinov		
Physical Address:	1 Travertine Rd, N1 Business Park, Centurion, 0157		
Postal Address:	Private Bag X4, The Reeds, Centurion, 0061		
Contact Number:	011-034-5300		
Email address	Info.Officer@antennas.alaris.tech		
2 What this request is for			
Please mark the appropriate box with an C			
<input type="checkbox"/>	Correction or deletion of the personal information about the data subject		
<input type="checkbox"/>	Destroying or deletion of a record of personal information about the data subject		
3 Details of Data Subject Requesting Correction or Deletion of Personal Information (if natural person)			
a) The particulars of the person who objects to processing of Personal Information must be given below.			
b) The address and/or fax number in South Africa to which the information is to be sent must be given.			
c) Proof of the capacity in which the request is made, if applicable, must be attached.			
Full names and surname			
Identity number			
Residential Address			
Postal Address			

