

**PROMOTION OF ACCESS TO INFORMATION ACT NO.
2 OF 2000
SECTION 51 MANUAL
FOR
MASSMART HOLDINGS PROPRIETARY LIMITED
Registration number: 1940/014066/07
and its subsidiaries**

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1. INTRODUCTION

This Manual is published in terms of section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA"). PAIA gives effect to the provisions of section 32 of the Constitution of the Republic of South Africa, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/or protection of any right.

Massmart Holdings is a private body as defined in PAIA, and this Manual contains the information specified in section 51(1) of PAIA, which is applicable to such a private body. The aim of this Manual is to assist Requesters in requesting access to information (documents, records and/or Personal Information) from Massmart Holdings as contemplated in PAIA.

This Manual may be amended from time to time, and once amendments have been affected, the latest version of this Manual will be distributed and published in accordance with PAIA. A Requester is invited to contact Massmart Holdings' Group Information Officer (see contact details below) should he/she require any assistance with the use or content of this Manual.

The reference to any information in addition to that specifically required in terms of section 51 of PAIA does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of PAIA.

This Manual was last reviewed and amended in March 2026 to reflect current contact details, branding, and compliance practices.

2. DEFINITIONS

Unless the context clearly indicates otherwise, the following terms shall have the meanings assigned to them hereunder, namely:

- 2.1. **"Data Subjects"** means the natural or juristic person/s to whom Personal Information relates;
- 2.2. **"Group Information Officer"** means the person acting on behalf of Massmart Holdings and discharging the duties and responsibilities assigned to the head of Massmart Holdings by PAIA. The Group Information Officer is duly authorised to act as such, and such authorisation has been confirmed by the head of Massmart Holdings in writing;
- 2.3. **"Information Regulator"** shall bear the meaning ascribed thereto in POPIA;
- 2.4. **"Manual"** means this manual published in compliance with section 51 of PAIA, together with all annexures thereto;
- 2.5. **"Massmart Group"** means the Massmart group of companies, comprising of Massmart Holdings (Pty) Ltd and its South African subsidiaries and associated companies and entities;
- 2.6. **"Massmart Holdings"** means Massmart Holdings (Pty) Ltd, a company registered in terms of the laws of the Republic of South Africa under registration number 1940/014066/07 and its subsidiaries, Masstores (Pty) Ltd, Massmart Retail (Pty) Ltd and Massmart Wholesale (Pty) Ltd;
- 2.7. **"Minister"** means the Minister of Justice and Correctional Services;
- 2.8. **"Personal Information"** has the meaning ascribed thereto under POPIA;

- 2.9. **“Personnel”** means any person who works for or provides services to or on behalf of Massmart Holdings and receives or is entitled to receive any remuneration. This includes, without limitation, directors (both executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;
- 2.10. **“POPIA”** means the Protection of Personal Information Act 4 of 2013, together with any regulations published thereunder;
- 2.11. **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including – the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, and "Process" has a corresponding meaning;
- 2.12. **“Record”** means any recorded information, regardless of form or medium, which is in the possession or under the control of Massmart Holdings, irrespective of whether it was created by Massmart Holdings;
- 2.13. **“Request”** means a request for access to a Record of Massmart Holdings;
- 2.14. **“Requester”** means any person, including a public body or an official thereof, making a Request for access to a Record of Massmart Holdings and includes any person acting on behalf of that person; and
- 2.15. **“Third Party”** means any independent contractor, agent, consultant, sub-contractor or other representative of Massmart Holdings.

3. OVERVIEW OF THE MASSMART GROUP

Massmart is a South African based, globally competitive management group operating an integrated omnichannel wholesale and retail business across sub-Saharan Africa. The Group manages a portfolio of complementary retail and wholesale formats that serve customers through physical stores, digital platforms and mobile applications, supported by integrated distribution and fulfilment capabilities.

Massmart’s operating model combines store based retailing with e-commerce, click and collect, on demand and homedelivery services, enabling customers to interact with the Group through multiple channels depending on their needs. The Group’s omnichannel capability is supported by centralised technology platforms, last mile delivery partners and distribution centres, as well as instore fulfilment.

The Massmart Group operates primarily through various business units, each comprising distinct retail and wholesale brands with dedicated management teams. These business units are supported by Group Centres of Excellence, which provide shared services, technology, supply chain, governance and compliance functions across the Group. Massmart operates hundreds of stores across multiple countries in sub-Saharan Africa.

This Manual only applies to Massmart Holdings and the abovementioned banners. Copies of the PAIA manuals in relation to the divisions of the Massmart Group can be found at:

DIVISION	LEGAL ENTITY	WEBSITE
Massmart Services	Masstores (Pty) Ltd t/a Massmart Services	http://www.massmart.co.za
Massmart Transport Services	Masstores (Pty) Ltd t/a Massmart Transport Services	http://www.massmart.co.za
Walmart Africa Stores	Masstores (Pty) Ltd t/a Walmart Africa Stores (Pty) Ltd	https://www.walmart.com/c/kp/south-africa
OneCart	OneCart (Pty) Ltd	www.onecart.co.za
Game	Masstores (Pty) Ltd t/a Game	https://www.game.co.za
Makro	Masstores (Pty) Ltd t/a Makro	https://www.makro.co.za
Builders	Massmart Retail (Pty) Ltd t/a Builders, Builders Express, Builders Trade Depot and Builders Superstore	https://www.builders.co.za
Cash & Carry	Massmart Wholesale (Pty) Ltd	http://www.massmart.co.za
Wumdrop ZA	Masstores (Pty) Ltd t/a Wumdrop	https://za.wumdrop.com

4. CONTACT DETAILS

The Group Information Officer of Massmart Holdings is the person to whom Requests for access to Records should be addressed.

The Group Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of PAIA as well as section 56 of POPIA. This is to render Massmart Holdings as accessible as is reasonably possible for Requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the POPIA. All Requests for information in terms of PAIA must be addressed to the Group Information Officer.

The Group Information Officer's contact details are listed below:

Name of Private Body	Massmart Holdings (Pty) Ltd
Postal address	Private Bag X4 Sunninghill 2157
Street address	Massmart House 16 Peltier Drive Sunninghill Ext 6 2157
Group Information Officer	Frank Louw

Email address of Group Information Officer	info.officer@massmart.co.za
Telephone Number	0115170000

5. HOW TO ACCESS THE GUIDE AS DESCRIBED IN SECTION 10 OF THE ACT

The Information Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages.

The Guide contains a description of, *inter alia*:

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of every Deputy Information Officer of every private body designated in terms of section 17(1) of PAIA, and section 56 of POPIA;
- the manner and form of a request for access to a record of a private body contemplated in section 50 of PAIA;
- the assistance available from the Information Regulator in terms of PAIA and POPIA;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging – an internal appeal; a complaint to the Information Regulator; and an application with a Court against a decision by the Information Regulator; and an application with a Court against a decision on internal appeal or a decision by the Information Regulator or a decision of the head of a private body;
- the provisions of section 51 of PAIA requiring a private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of section 52 of PAIA providing for the voluntary disclosure of categories of records by a private body;
- the notices issued in terms of sections 22 and 54 of PAIA regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92 of PAIA.

The Guide is accessible on the Information Regulator's website, as well as from the offices of the Information Regulator during normal working hours, or you may request a copy of the Guide from Massmart Holdings by contacting our Group Information Officer. You may also direct any queries to:

The Information Regulator of South Africa

Physical Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

Postal Address: P.O. Box 31533, Braamfontein, Johannesburg, 2017
E-mail: inforeg@justice.gov.za / POPIAComplaints.IR@justice.gov.za /
PAIAComplaints.IR.@justice.gov.za /
Website: <https://inforegulator.org.za>

6. HOW TO REQUEST ACCESS TO RECORDS HELD BY MASSMART HOLDINGS

PAIA grants the Requester a right to request for access to records of a private body if the record is required for the exercise or protection of any rights. If a public body lodges a request in terms of PAIA, the public body must be acting in public interest. POPIA provides that a Data Subject may, upon proof of identity, request Massmart Holdings to confirm, free of charge, all the information it holds about the Data Subject. POPIA provides that a Data Subject may object, at any time, to the processing of personal information by Massmart Holdings, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing.

Should you wish to make a request to access Records held by Massmart Holdings in terms of section 50 of PAIA, kindly visit our [Privacy Centre](https://www.massmart.co.za/privacy-centre) (<https://www.massmart.co.za/privacy-centre>) to initiate the application Process or send your request to info.officer@massmart.co.za.

Access to information shall be made in accordance with the provisions of PAIA. Alternatively, the Requester must use the prescribed form to make the request for access to a record, which form is specified in paragraph 18.2. The request must be made to the Information Officer at the address or electronic mail address of the body concerned (*see s 53(1) of PAIA*).

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 and specify a postal address, fax number in the Republic or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed (*see sections 53(2)(a) and (b) and (c) and (e) of PAIA*).

The Requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right (*see section 53(2)(d) of PAIA*).

If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of the private body (*see s 53(2)(f) of PAIA*).

Massmart Holdings is required to inform a Requester in writing of its decision in relation to a Request within 30 days from date of receipt of the Request. If the Requester wishes to be informed of Massmart Holdings' decision in another manner as well, this must be set out in the Request and the relevant details included, allowing Massmart Holdings to inform the Requester in the preferred manner.

A Data Subject may also request Massmart Holdings to correct or delete personal information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or

obtained unlawfully; or destroy or delete a record of personal information about the data subject that Massmart Holdings is no longer authorised to retain in terms of POPIA's retention and restriction of records provisions.

Should you wish to access and/or change and/or delete any of your personal information, please visit our [Privacy Centre](#)

7. FEES PAYABLE

The list detailing the prescribed fees payable to Massmart Holdings in respect of Requests and the fees in respect of access to Records (if the Request is granted) is listed in paragraph 18.2.

Kindly note that all Requests to Massmart Holdings will be evaluated and considered in accordance with PAIA. Publication of this Manual and describing the categories and subject matter of information held by Massmart Holdings does not give rise to any rights (in contract or otherwise) to access such information or Records except in terms of PAIA.

Note: Fees subject to annual adjustment by regulations.

8. GROUNDS FOR REFUSAL

Massmart Holdings may, and must in certain instances, refuse access to Records on any of the grounds set out in Chapter 4 of Part 3 of PAIA.

Requests for access by a Requester must be refused by the Group Information Officer if:

- 8.1. the disclosure would involve the unreasonable disclosure of personal information about a third party (natural person), including a deceased individual (see section 63 of PAIA);
- 8.2. the record contains (a) trade secrets of a third party, (b) financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party, or (c) information supplied in confidence by a third party the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations; or to prejudice that third party in commercial competition (see section 64 of PAIA);
- 8.3. the disclosure of the record would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement (see section 65 of PAIA) and; the disclosure could reasonably be expected to endanger the life or physical safety of an individual (see section 66(a) of PAIA);
- 8.4. the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege (see section 67 of PAIA); or
- 8.5. the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose: (a) the third party; (b) a person that is or will be carrying out the

research on behalf of the third party; or (c) the subject matter of the research, to serious disadvantage (see section 69 of PAIA).

8.6. the disclosure would be likely to prejudice or impair: (i) the security of: (aa) a building, structure or system, including, but not limited to, a computer or communication system; (bb) a means of transport; or (cc) any other property; or (ii) methods, systems, plans or procedures for the protection of: (aa) an individual in accordance with a witness protection scheme; (bb) the safety of the public, or any part of the public; or (cc) the security of property contemplated in subparagraph (i) (aa), (bb) or (cc) (see section 66(b) of PAIA);

8.6.1. the record contains:

8.6.1.1. trade secrets of Massmart Holdings; financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of Massmart Holdings.

8.6.1.2. information, the disclosure of which could reasonably be expected:

8.6.1.2.1. to put Massmart Holdings at a disadvantage in contractual or other negotiations; or

8.6.1.2.2. to prejudice Massmart Holdings' commercial competition; or

8.6.1.2.3. is a computer program, as defined in section 1(1) of the Copyright Act 98 of 1978, owned by Massmart Holdings, except insofar as it is required to give access to a record to which access is granted in terms of PAIA (see section 68(1) of PAIA); or

8.6.1.3. information about research being or to be carried out by or on behalf of Massmart Holdings, the disclosure of which would be likely to expose (a) Massmart Holdings; (b) a person that is or will be carrying out the research on behalf of Massmart Holdings; or (c) the subject matter of the research, to serious disadvantage (see section 69(2) of PAIA).

Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

All Requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

If a requested Record cannot be found or if the Record does not exist, the Group Information Officer shall, by way of an affidavit or affirmation, notify the Requester that it is not possible to give access to the requested Record. Such a notice will be regarded as a decision to refuse a Request for access to the record concerned for the purpose of PAIA. If the Record should later be found, the Requester shall be given access to the Record in the manner stipulated by the Requester in the prescribed form, unless the Group Information Officer refuses access to such Record.

9. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

The decision of the Group Information Officer or Deputy Information Officer is final.

A requester aggrieved by a decision of the Group Information Officer to refuse a request for access may, within 180 days of the Group Information Officer's decision, submit a complaint to the Information Regulator in the prescribed manner and form (see section 77A of PAIA).

Alternatively, a requester is entitled to apply to a court of competent jurisdiction for appropriate relief (see section 78 of PAIA).

10. VOLUNTARY DISCLOSURE

Certain information is freely available at Massmart Holdings. This information consists of its most recent Annual Report and other information relating to Massmart Holdings is available on its website at www.massmart.co.za. Brochures are mailed to customers, inserted into newspapers and other publications and made available in our retail stores.

Certain information is also made available to employees of Massmart Holdings, which is not generally made available to the public. To avoid confusion, these items of information are not listed here but may be obtained by Massmart Holdings employees from its HR office upon request.

11. CATEGORIES OF REQUESTORS

The capacity under which a Requestor makes a request for records defines the category in which the Requestor will fall into. The following is a non-exhaustive list of Requestors:

- 11.1. A Data Subject who makes requests about themselves;
- 11.2. A representative who makes a request on behalf of the Data Subject(s);
- 11.3. A third party who requests information about a Data Subject; or
- 11.4. A public body who requests information in the public interest.

12. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

Information is retained in terms of the following legislation and is usually available only to the persons or entities specified in such legislation. The legislation includes, but is not limited to, the following:

Item	Legislation	Records / Data That May Be Requested
12.1.	Basic Conditions of Employment Act 75 of 1997	Employment contracts; working hours records; leave records; remuneration and pay slips

Item	Legislation	Records / Data That May Be Requested
12.2.	Broad-Based Black Economic Empowerment Act 53 of 2003	B-BBEE certificates; scorecards; verification reports; transformation policies
12.3.	Companies Act 61 of 1973 (partially repealed)	Historical company records retained under transitional provisions
12.4.	Companies Act 71 of 2008	Memorandum of Incorporation (MOI); company registration documents; directors' registers; annual returns; shareholder records
12.5.	Compensation for Occupational Injuries and Diseases Act 130 of 1993	Injury-on-duty reports; COID claim forms; compensation records
12.6.	Competition Act 89 of 1998	Competition compliance policies; merger filings (where applicable); correspondence with competition authorities
12.7.	Consumer Affairs (Unfair Business Practices) Act 71 of 1988	Historical consumer complaints; investigation records (where retained)
12.8.	Consumer Protection Act 68 of 2008	Consumer complaints; refund records; product recall information; consumer agreements
12.9.	Copyright Act 98 of 1978	Copyright licences; intellectual property records; software licences
12.10.	Customs and Excise Amendment Act 45 of 1995	Import/export documentation; customs declarations
12.11.	Debt Collectors Act 114 of 1998	Debt collection records; correspondence with debt collectors
12.12.	Deeds Registries Act 47 of 1937	Property ownership records; title deed information (where applicable)
12.13.	Electronic Communications and Transactions Act 25 of 2002	Electronic transaction records; electronic contracts; audit logs
12.14.	Employment Equity Act 55 of 1998	Employment Equity plans; EE reports; workforce demographic data
12.15.	Financial Intelligence Centre Act 38 of 2001 (FICA)	Customer due diligence records; KYC documents; risk assessments
12.16.	Hazardous Substances Act 15 of 1973	Permits; safety data sheets; hazardous substance registers
12.17.	Income Tax Act 58 of 1962	Tax returns; PAYE records; IRP5s; tax compliance documentation
12.18.	Insider Trading Act 135 of 1998	Market sensitive information policies; insider registers (historical)
12.19.	Labour Relations Act 66 of 1995	Disciplinary records; grievance records; CCMA correspondence
12.20.	Liquor Act 59 of 2003	Liquor licences; compliance certificates
12.21.	Manpower Training Act 56 of 1981	Historical training and skills development records
12.22.	Medicines and Related Substances Control Act 101 of 1965	Product registration records; compliance documentation
12.23.	National Credit Act 34 of 2005	Credit agreements; affordability assessments; customer credit records

Item	Legislation	Records / Data That May Be Requested
12.24.	National Environmental Management Act 107 of 1998	Environmental compliance reports; permits; impact assessments
12.25.	Pension Funds Act 24 of 1956	Pension fund membership records; contribution records
12.26.	Tax on Retirement Funds Act 38 of 1996	Retirement benefit tax records
12.27.	Prevention and Combating of Corrupt Activities Act 12 of 2004	Anti-corruption policies; whistleblowing records
12.28.	Prevention of Organised Crime Act 121 of 1998	Suspicious transaction reports; asset forfeiture related records
12.29.	Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000	Equality policies; discrimination complaints
12.30.	Protected Disclosures Act 26 of 2000	Whistleblowing reports; investigation outcomes
12.31.	Protection of Personal Information Act 4 of 2013 (POPIA)	Personal information records; consent records; data subject requests
12.32.	Regulation of Interception of Communications Act 70 of 2002 (RICA)	Communication interception compliance records
12.33.	Skills Development Act 97 of 1998	Workplace Skills Plans; training records; SETA submissions
12.34.	South African Revenue Service Act 34 of 1997	Correspondence with SARS; compliance records
12.35.	Health Act 63 of 1977	Health compliance records; inspection reports
12.36.	Medical Schemes Act 131 of 1998	Medical aid contribution records
12.37.	Occupational Health and Safety Act 85 of 1993	Health and safety policies; incident reports; risk assessments
12.38.	Value Added Tax Act 89 of 1991	VAT returns; VAT invoices; tax invoices
12.39.	Tobacco Products Control Act 83 of 1993	Compliance records; product labelling documentation
12.40.	Trade Marks Act 194 of 1993	Trademark registrations; IP portfolios
12.41.	Unemployment Insurance Contributions Act 4 of 2002	UIF contribution records
12.42.	Unemployment Insurance Act 63 of 2001	UIF declarations; employee benefit records

Although we have used our best endeavors to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof. Access to the above records is subject to the provisions of PAIA, POPIA and any applicable grounds for refusal. Inclusion in this list does not create an automatic right of access.

Records kept in terms of the above legislation may, in certain instances (and insofar as the information contained therein is of a public nature) be available for inspection without a person having to Request access thereto in terms of PAIA.

13. RECORDS BY MASSMART HOLDINGS

We maintain Records on the following categories and subject matters. However, please note that recording a category or subject matter in this Manual does not imply that a Request for access to such Records would be honoured. Certain grounds of refusal as set out in PAIA may be applicable to a Request for such Records. All Requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

13.1. Company Records

- 13.1.1. Documents of Incorporation;
- 13.1.2. Memorandum and Articles of Association;
- 13.1.3. Necessary certificates in terms of the Companies Act 71 of 2008;
- 13.1.4. Share registers and other statutory registers;
- 13.1.5. Names of directors;
- 13.1.6. Minutes of meeting of committees and sub-committees;
- 13.1.7. Operational Records;
- 13.1.8. Company policies and directives;
- 13.1.9. Intellectual property;
- 13.1.10. Marketing Records;
- 13.1.11. Legal Records;
- 13.1.12. Internal correspondence;
- 13.1.13. Statutory Records;
- 13.1.14. Internal policies and procedures;
- 13.1.15. Records held by officials of Massmart Holdings.

13.2. Financial records

- 13.2.1 Financial Records and reports;
- 13.2.2 Accounting Records;
- 13.2.3 Audit Records and reports;
- 13.2.4 Debtors Records;
- 13.2.5 Tax returns;
- 13.2.6 Banking Records;
- 13.2.7 Financial policies and procedures;
- 13.2.8 Risk management Records;
- 13.2.9 Management accounts and Records;
- 13.2.10 Purchase and order Records;
- 13.2.11 General correspondence

13.3. Personal records

- 13.3.1. A list of Massmart Holdings' and the Massmart Group's Personnel;
- 13.3.2. Any personal Records provided to Massmart Holdings by its Personnel;
- 13.3.3. Any Records a third party has provided to Massmart Holdings about any of its Personnel;
- 13.3.4. Conditions of employment and other Personnel-related contractual and quasi-legal Records;
- 13.3.5. Internal evaluation Records;
- 13.3.6. Skills plans;
- 13.3.7. Disciplinary Records;
- 13.3.8. Termination Payments;
- 13.3.9. Employment Equity Plans of the Massmart Group;
- 13.3.10. Employee Tax information;
- 13.3.11. Training schedules and manuals;
- 13.3.12. Payroll Records;
- 13.3.13. Pension and Provident Fund Records;
- 13.3.14. Internal policies and procedures;
- 13.3.15. General correspondence;
- 13.3.16. Other internal Records and correspondence; and
- 13.3.17. B-BBEE plans of the Massmart Group.

13.4. Customer-related and Supplier Records

- 13.4.1. Any Records a customer has provided to the Massmart Group or a third party acting for or on behalf of the Massmart Group;
- 13.4.2. Any credit Records or other research conducted by the Massmart Group in respect of its customers or research derived by the Massmart Group from its customers and their activities;
- 13.4.3. Any Records a third party has provided to the Massmart Group either directly or indirectly;
- 13.4.4. Records generated by or within the Massmart Group pertaining to the customer, including transactional Records.
- 13.4.5. Records evidencing commercial relationship between Massmart Holdings and a supplier or service provider, including supplier onboarding information, contractual and transactional records such as service level agreements, purchase orders, supplier performance and quality assurance records, and any related termination or suspension notices.

13.5. Information Technology

- 13.5.1. Computer software;
- 13.5.2. IT technology capabilities;
- 13.5.3. Support and maintenance agreements;
- 13.5.4. Records regarding computer systems;
- 13.5.5. Programs including software license agreements;
- 13.5.6. IT policies and procedures;

- 13.5.7. Network Diagrams;
- 13.5.8. Configuration setups;
- 13.5.9. Systems and user manuals;
- 13.5.10. Asset register for IT-related material;
- 13.5.11. System Performance Records;
- 13.5.12. General correspondence.

13.6. Insurance Records

- 13.6.1. Insurance Policies taken for the benefit of The Company and its employees.

13.7. Permits

- 13.7.1. Licenses, material permits, consents, approvals, authorisations and certificates
- 13.7.2. Applications for permits, licenses, etc; and
- 13.7.3. Registrations and declarations of permits.

13.8. Other Parties

- 13.8.1. Records are kept in respect of other parties, including without limitation contractors, commercial banks, auditors and consultants, suppliers, joint venture companies and service providers, and general market conditions. In addition, such other parties may possess Records which can be said to belong to the Massmart Group. The following Records fall under this category:

- 13.8.1.1. Personnel, customer, or Massmart Holdings Records which are held by another party as opposed to being held by the Massmart Group; and
- 13.8.1.2. Records held by the Massmart Group pertaining to other parties, including financial Records, correspondence, contractual Records, Records provided by the other party, and Records third parties have provided about the contractors or suppliers

13.9. Other records

- 13.10. Further Records are held including:

- 13.10.1. Information relating to the Massmart Group's own commercial activities; and
- 13.10.2. Research information belonging to the Massmart Group or carried out on behalf of a third party.

14. INFORMATION AVAILABLE IN TERMS OF POPIA

14.1. Categories of Personal Information collected by Massmart Holdings

Massmart Holdings may collect information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- 14.1.1. 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;
- 14.1.2. information relating to the education or the medical, financial, criminal or employment history of the person;
- 14.1.3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- 14.1.4. the biometric information of the person;
- 14.1.5. the personal opinions, views or preferences of the person;
- 14.1.6. 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;
- 14.1.7. the views or opinions of another individual about the person; and
- 14.1.8. 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.

14.2. The purpose of processing personal information

In terms of POPIA, data must be processed for a specified purpose. The purpose for which data is processed by Massmart Holdings will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

In general, personal information is processed for purposes of transacting with customers, onboarding suppliers, service providers, service or product delivery, records management, security, employment / recruitment and related matters. Please also refer to the Massmart's Privacy Statement for further information in our [Privacy Centre](#).

Massmart will retain personal information only for as long as is necessary to accomplish its legitimate business purposes or for as long as may be permitted or required by applicable law and in accordance with Massmart's Holdings Group Data Retention policy.

Massmart does not currently engage in automated decision-making or profiling that produces legal effects for Data Subjects.

14.3. Categories of data subjects

Massmart Holdings collects personal information directly from the Data Subject and/or from Third Parties and where Massmart Holdings obtains personal information from Third Parties, Massmart will ensure that it obtains the consent of the Data Subject to do so, or will only Process the Personal Information without the Data Subject's consent where Massmart is permitted to do so in terms of the applicable laws.

Massmart Holdings processes personal information of the following categories of Data Subjects:

- 14.3.1. customers of Massmart Holdings;
- 14.3.2. employees / Personnel of Massmart Holdings;
- 14.3.3. independent contractors of Massmart Holdings;
- 14.3.4. suppliers of Massmart Holdings; and
- 14.3.5. any third party with whom Massmart Holdings conducts business.

14.4. Categories of recipients to whom Personal Information may be supplied

Depending on the nature of the Personal Information, Massmart Holdings may supply information or records to the following categories of recipients:

- 14.4.1. statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data;
- 14.4.2. any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules;
- 14.4.3. South African Revenue Services, or another similar authority;
- 14.4.4. anyone making a successful application for access in terms of PAIA or POPIA; and
- 14.4.5. subject to the provisions of POPIA and other relevant legislation, Massmart Holdings may share information about Data Subject's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which Massmart Holdings operates.

14.5. Transborder flows of Personal Information

Massmart Holdings may need to transfer a Data Subject's personal information to its related parties and service providers in countries outside South Africa, these countries may not have data-protection laws which are similar to those of South Africa.

Where Personal Information is transferred outside South Africa, Massmart Holdings relies on appropriate safeguards such as standard contractual clauses, binding corporate rules (where applicable to Massmart group entities), or other mechanisms permitted under POPIA section 72.

14.6. Information Security Measures

The security and confidentiality of personal information is important to Massmart. We have implemented reasonable technical, administrative, and physical security measures to protect personal information from unauthorised access or disclosure and improper use.

We are committed to ensuring that our security measures which protect your personal information are continuously reviewed and updated where necessary.

In Processing any personal information, Massmart Holdings shall comply with the following minimum technical and organisational security requirements:

- 14.6.1. **Physical Access** – Access to personal information is restricted in our offices (in senior Personnel offices), under lock and key, and only to those Personnel who need the Personal Information to perform a specific job / task.
- 14.6.2. **Personnel Training** – All Personnel with access to personal information are kept up to date on our security and privacy practices. After a new policy is added, these Personnel are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for the Personal Information of all Data Subjects.
- 14.6.3. **Unique User Identification** – Personnel each have a unique user ID assigned to them, subject to strict confidentiality undertakings in terms of Massmart's password, access control and confidentiality policies.
- 14.6.4. **Passwords** – Massmart Holdings shall ensure that there are passwords required for any access to Personal Information in line with its password policy.
- 14.6.5. **Physical access and privileges** – Massmart Holdings ensures that access to Personal Information is limited to Personnel on a "need to know" basis, and Personnel are required to strictly utilise their unique user ID and applicable passwords to access same.
- 14.6.6. **Systems Review** – Massmart Holdings conducts regular reviews of its technical and organisational security measure system in order to ensure that all of the above security measures are functioning effectively and applied consistently.

15. INFORMATION OR RECORDS NOT FOUND

If all reasonable steps have been taken to find a Record, and such a Record cannot be found or if the Records do not exist, then Massmart Holdings will notify the Requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested Record.

The affidavit or affirmation will provide a full account of all the steps taken to find the Record or to determine the existence thereof, including details of all communications by Massmart Holdings with every person who conducted the search.

If the Record in question should later be found, the Requester shall be given access to the Record in the manner stipulated by the Requester unless access is refused by Massmart Holdings as permitted by PAIA.

16. INFORMATION REQUESTED ABOUT A THIRD PARTY

Where any information is requested from Massmart Holdings that relates to a third party, Massmart Holdings is required to notify the third party of the Request. The third party has an opportunity to grant his, her or its consent to the disclosure of the Record or to make representations as to why the requested Record should not be disclosed to the Requester. If Massmart Holdings decides to grant access to the Record, it will notify the affected third party

again. The third party is entitled to apply to court in relation to that decision. The court will then determine whether the Record should be disclosed by Massmart Holdings or not.

17. OTHER INFORMATION AS PRESCRIBED

The Minister has not prescribed that any further information must be contained in this Manual.

18. AVAILABILITY OF THIS MANUAL

A copy of this Manual is available:

- on our website (<https://www.massmart.co.za/paia/>) or by sending a Request for a copy to the Group Information Officer by email;
- at the Massmart Holdings Head Office (being the principal place of business) for inspection by the general public during normal office hours;
- to any person, upon request and subject to the payment of a reasonable fee; and
- to the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in the Regulations, shall be payable per each A4-size photocopy made.

18.1. Request fees:

Where a Requester submits a Request for access to information held by Massmart Holdings on a person other than the Requester himself/herself, a Request fee in the amount of R140.00 is payable up-front before Massmart Holdings will further Process the Request received. This Request fee may be paid at the time a Request is made, or the person authorised to deal with such Requests on Massmart Holdings' behalf may notify the Requester to pay the Request fee before processing the Request any further. A Requester may make an application to Court to be exempted from the requirement to pay the Request fee (see section 54(1) and 54(3)(b) of PAIA).

If access to a Record/s is granted by Massmart Holdings, the Requester may be required to pay an access fee for the search for and preparation of the Records and for re-production of the Record/s. The access fees which apply are set out below.

18.2. Access fees:

An access fee is payable in all instances where a Request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of PAIA, or an exclusion is determined by the Minister in terms of section 54(8). Massmart Holdings is entitled to withhold a Record until the required access fees have been paid.

The applicable access fees which will be payable are:

Item	Description	Amount (Rand)
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on: 1 Flash drive (to be provided by requester) 2 Compact disc 2.1 If provided by requester 2.2 If provided to requester	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of audio record on: 1 Flash drive (to be provided by requester) 2 Compact disc 2.1 If provided by requester 2.2 If provided to requester	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation To not exceed a total cost of	R145.00 R435.00
10.	Deposit: if search exceeds 6 hours	One third of amount per request calculated in terms of item 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

Where an institution has voluntarily provided the Minister with a list of categories of Records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such Records, will be a fee for reproduction of the Record in question.

18.3. Deposits:

Where Massmart Holdings receives a Request for access to information held on a person other than the Requester himself/herself and the Group Information Officer upon receipt of the Request is of the opinion that the preparation of the required Record of disclosure will take more than 6 (six) hours, a deposit is payable by the Requester. The

Requester may make an application to Court to be exempted from the requirement to pay this deposit. If a deposit is made and access to the Records requested is subsequently refused, the deposit will be repaid to the Requester. The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee. Note: In terms of Regulation 8, Value Added Tax (VAT) must be added to all fees prescribed in terms of the Regulations

19. REVIEW AND UPDATING OF THE MANUAL

19.1. Massmart Holdings is committed to ensuring that this Manual remains accurate, relevant and compliant with applicable legislative and regulatory requirements, including PAIA and POPIA.

19.2. The Manual shall be reviewed on an annual basis, or more frequently where necessary, to ensure that the information contained herein is up to date and reflective of:

19.2.1. amendments to PAIA, POPIA or any other applicable legislation;

19.2.2. material changes to the operations, structure or records of Massmart Holdings and its subsidiaries; and

19.2.3. any guidance, directives or recommendations issued by the Information Regulator.

19.3. In addition to the annual review, the Manual may be updated at any time in the event of compelling or material changes, including but not limited to legislative amendments, regulatory developments, or significant organisational or operational changes that impact access to records.