

# PAIA MANUAL

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 IN RESPECT OF SMOLLAN HOLDINGS PROPRIETARY LIMITED

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## 1. Introduction

This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act No.2 of 2000 ("**PAIA**").

The aim of the Manual is to assist potential Requesters in requesting access to information (documents, records and/or Personal Information) from Smollan and all Smollan Group Members as contemplated under PAIA.

The Manual may be amended from time to time and as soon as any amendments have been affected, the latest version of the Manual will be published and distributed in accordance with PAIA.

A Requester is invited to contact the Information Officer should he or she require any assistance in respect of the use or content of this Manual.

The definitions provided in this Manual are solely for the purpose of this Manual and are not to be taken as applicable to PAIA.

## 2. Definitions

The following words or expressions will bear the following meanings in this Manual –

- 2.1. "**Customer**" means a natural or juristic person who or which receives services and/or products from Smollan;
- 2.2. "**Data Subject**" means the natural or juristic person to whom Personal Information relates;
- 2.3. "**Correspondence**" means any written and/or electronic communication exchanged between two or more parties;
- 2.4. "**Employee**" means any person who works for, or provides services to, or on behalf of Smollan, and receives or is entitled to receive remuneration;
- 2.5. "**Smollan**" means Smollan Holdings Proprietary Limited, registration number 1981/001679/07, with its registered address at Hathorn House, 27 Hathorn Avenue, Maryvale, Gauteng, 2192;
- 2.6. "**Smollan Group Member**" means each of the Smollan entities listed in Annexure "**B**" to this Manual.;
- 2.7. "**Information Officer/s**" means Smollan's and/or the Smollan Group Member's designated information officer/s described in paragraph 6 of this Manual;
- 2.8. "**Manual**" means this manual, together with all annexures thereto as amended and made available on the website of Smollan and at the offices of Smollan from time to time;
- 2.9. "**PAIA**" means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder;
- 2.10. "**POPIA**" means the Protection of Personal Information Act No. 4 of 2013, together with any regulations published thereunder;



- 2.11. **"Personal Information"** has the meaning ascribed thereto under POPIA;
- 2.12. **"Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –
- 2.12.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
  - 2.12.2. dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or
  - 2.12.3. merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, **"Process"** has a corresponding meaning;
- 2.13. **"Requester"** means any person or entity (including any Data Subject) requesting access to a record that is under the control of Smollan;
- 2.14. **"SAHRC"** means the South African Human Rights Commission; and
- 2.15. **"Third-Party"** means any independent contractor, agent, consultant, sub-contractor or other representative of Smollan.

### 3. SCOPE of the MANUAL

This Manual has been prepared in respect of, and applies to, Smollan and the Smollan Group Members. Any reference to Smollan under this Manual shall specifically include the Smollan Group Members.

### 4. How to use PAIA to access information

*(Information provided in terms of section 51(1) of PAIA)*

- 4.1. PAIA grants a Requester 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 the public interest.
- 4.2. Requests in terms of PAIA shall be made in accordance with the prescribed procedures, and at the prescribed fees.
- 4.3. A guide on how to use PAIA has been compiled by the SAHRC (and shall be updated by the Information Regulator from time to time) in terms of section 10 of PAIA and is available on the SAHRC website ([www.sahrc.org.za](http://www.sahrc.org.za)). Any queries should be directed to:

The South African Human Rights Commission  
PAIA Unit  
Research and Documentation Department  
**Postal Address:** Private Bag 2700 Houghton 2041 South Africa  
**T** +27 (0)11 484 8300  
**F** +27 (0)11 484 0582  
**E** PAIA@sahrc.org.za



## 5. Overview of the structure and functions of Smollan

- 5.1. Smollan is incorporated and registered in the Republic of South Africa under registration number 1981/001679/07.
- 5.2. Smollan is an investment holding company with a number of related entities (i.e. the Smollan Group Members) – which primarily comprise diversified services companies. In general, however, the main business functions of the Smollan Group Members pertain to the creation and execution of commerce solutions in the context of the provision of sales, marketing, data and technology, advisory, and business services.

## 6. Smollan’s contact details

*(Information required under section 51(1)(a) of PAIA)*

Name of Body:	Smollan Holdings Proprietary Limited
<b>Physical &amp; Postal Addresses:</b>	<p><b>Physical:</b> Hathorn House, 27 Hathorn Avenue, Maryvale, Gauteng, 2192</p> <p><b>Postal:</b> PO BOX 51537, Raedene, Gauteng, 2124</p>
<b>Head of Body</b>	<p><b>Name:</b> D L Smollan</p> <p><b>T:</b> +27 11 640 8000</p> <p><b>E:</b> david.smollan@smollan.com</p>
<b>Information Officer</b>	<p><b>Name:</b> Ms. M Pretorius</p> <p><b>T:</b> +27 11 640 8000</p> <p><b>E:</b> Milana.Pretorius@smollan.com</p>

## 7. Smollan's processing of personal information in terms of popia

*(Information required under section 51(1)(c) of PAIA)*

### 7.1. Purpose of Smollan's Processing of Personal Information

- 7.1.1. Smollan will process Personal Information only in ways that are for, or compatible with, the business purposes for which the data was collected or that are subsequently authorised by the relevant Data Subject.
- 7.1.2. Smollan will retain Personal Information only for as long as is necessary to accomplish Smollan's legitimate business purposes or for as long as may be permitted or required by applicable law.



- 7.1.3. We use the Personal Information we collect to serve our Customers, consider applicants, and market and promote our services. Some examples include –
- 7.1.4. Collecting Personal Information from existing Smollan Customers in the context of the sale of Smollan's products and services to such existing Customers.
- 7.1.5. Communicating with our Customers, suppliers and contractors by email, telephone, or text message, in accordance with their wishes;
- 7.1.6. Sharing Personal Information with Third Parties such as Smollan's suppliers and regulators (such as, for example, the Information Regulator (under POPIA);
- 7.1.7. Monitoring the use of Smollan's electronic systems and online platforms by Data Subjects;
- 7.1.8. Continuously evaluating and improving the online and mobile user experience of our Customers;
- 7.1.9. Undertaking research and data analytics in respect of Personal Information;
- 7.1.10. Sending Data Subjects notifications when Smollan requires Data Subjects to participate on research projects, unless Data Subjects have told Smollan that they do not want to receive such notifications;
- 7.1.11. Preventing, discovering and investigating violations of Smollan's Privacy Policy, and investigating fraud, chargebacks or other matters; and
- 7.1.12. Contacting Customers with regard to their use of Smollan's products and services and, in Smollan's discretion, changes to the policies relating thereto.

**7.2. Smollan will not use the Personal Information which we collect for any purposes other than those purposes specified in paragraph 7.1.2 above.**

**7.3. Categories of Data Subjects and of the Personal Information relating thereto**

- 7.3.1. Smollan collects Personal Information directly from the Data Subject and/or from Third Parties, and where Smollan obtains Personal Information from Third Parties, Smollan 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 Smollan is permitted to do so in terms of the applicable laws.
- 7.3.2. Data Subjects in respect of which Personal Information is Processed include Customers of Smollan.
- 7.3.3. Examples of Third Parties from whom Personal Information is collected include other Smollan Group Members; our Customers when Smollan handles Personal Information on their behalf; regulatory bodies; credit reference agencies (such as, for example, Experian, TransUnion, Compuscan and XDS, Lexis Nexus); other companies providing services to Smollan and where Smollan makes use of publicly available sources of information.



#### 7.4. Recipients or categories of recipients to whom Personal Information may be supplied

- 7.4.1. Smollan may be required to disclose Personal Information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any Court or Tribunal. We may disclose Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Smollan, our Customers, or others.
- 7.4.2. Smollan will with POPIA before transferring Personal Information to a Third-Party who is not a contractor of Smollan. Before transferring Personal Information to a Third-Party contractor, such as an authorised service provider, Smollan will obtain assurances from the Third-Party that it will process Personal Information in a manner consistent with POPIA. Where Smollan learns that a Third-Party contractor is using or disclosing Personal Information in a manner contrary to POPIA, Smollan will take reasonable steps to prevent such use or disclosure.
- 7.4.3. We reserve the right to disclose and transfer a Data Subject's information, including their Personal Information in connection with a corporate merger, consolidation, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

#### 7.5. Planned Transborder Flows of Personal Information

In carrying out any cross-border transfers, Smollan shall adhere to the provisions of POPIA.

#### 7.6. Information Security Measures

- 7.6.1. The security and confidentiality of Personal Information is important to Smollan. We have implemented reasonable technical, administrative, and physical security measures to protect Personal Information from unauthorised access or disclosure and improper use.
- 7.6.2. We are committed to ensuring that our security measures which protect your Personal Information are continuously reviewed and updated where necessary.
- 7.6.3. In Processing any Personal Information, Smollan shall comply with the following minimum technical and organisational security requirements –

**Physical Access** – Access to Personal Information is restricted in our offices and only to those Employees who need the Personal Information to perform a specific job / task.

**Employee Training** – All Employees with access to Personal Information are kept up-to-date on our security and privacy practices. After a new policy is added, these Employees 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.



**Unique User Identification** – Employees each have a unique user ID assigned to them, subject to strict confidentiality undertakings in terms of Smollan's password and confidentiality policy.

**Passwords** – Smollan shall ensure that there are passwords required for any access to Personal Information in line with its password policy.

**Physical access and privileges** – Smollan ensure that access to Personal Information is limited to Employees on a "need to know" basis, and Smollan Employees are required to strictly utilise their unique user ID and applicable passwords to access same.

**Back-ups** – Smollan ensures that all Personal Information is backed-up regularly, based on operational or legal requirements, and that back up testing is conducted regularly in order to ensure that Personal Information can be recovered in the event that such Personal Information is lost, damaged or destroyed.

**Malware protection** – Smollan ensures that its environment has comprehensive malware protection software employed, which software is specifically designed to protect Smollan from the most recent malware infections.

**Vulnerability scanning** – Smollan frequently conducts vulnerability scanning in order to assess whether Personal Information is adequately protected from external threats.

**Systems Review** – Smollan 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.

## 8. Information held by Smollan in terms of PAIA

*(Information required under section 51(1)(e) of PAIA)*

This section of the Manual sets out the categories and descriptions of records held by Smollan. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under PAIA. In particular, certain grounds of refusal as set out in PAIA may be applicable to a request for such records.

### 8.1. Company records

- Company name documents
- Company registration documents
- Founding statement or Memorandum of Incorporation
- Minutes of meetings
- Licenses
- Licensing and franchising agreements
- Certification, professional qualifications and registration

### 8.2. Accounting records

- Details of accounting officer or auditors
- Formal books of account and financial statements





- Source documents
- Customs, excise and logistics
- Banking records
- Management reports
- Company tax returns

### 8.3. Customer records

- Promotional competitions

### 8.4. Human Resources records

- Employee policies
- Pension funds
- Recruitment
- Health and safety documentation
- Workplace Skills Plans (WSP)
- Annual Training report

### 8.5. Operations records

- Specifications
- Procedures
- Plans
- Stock records
- Asset register
- Corporate social investment / charity / BEE work done.

### 8.6. Marketing

- Website
- Marketing materials
- Marketing campaign history

## 9. Information kept by Smollan in accordance with other legislation

*(Information required under section 51(1)(b)(iii) of PAIA)*

9.1. Records are kept in accordance with legislation applicable to Smollan, which includes but is not limited to, the following:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of the Republic of South Africa, 1996
- Consumer Protection Act 68 of 2008



Electronic Communications and Transactions Act 25 of 2002  
Employment Equity Act 55 of 1998  
Income Tax Act 58 of 1962 (Section 75)  
Insolvency Act 24 of 1936  
Labour Relations Act 66 of 1995  
National Credit Act 34 of 2005  
Occupational Health and Safety Act 85 of 1993  
Promotion of Access to Information Act 2 of 2000  
Pension Funds Act 24 of 1956  
Promotion of Access to Information Act 2 of 2000  
Protection of Personal Information Act 4 of 2013  
Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002  
Skills Development Act 97 of 1998  
Tax Administration Act 28 of 2011  
Tax on Retirement Funds Act 38 of 1996  
Trademarks Act 194 of 1993  
Value Added Tax Act 89 of 1991

9.2. 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.

## 10. Request Procedures

10.1. Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA.

### 10.2. Form of request

10.2.1. The Requester must use the prescribed form to make the request for access to a record, which form is attached hereto as Annexure "A". This must be made to the Information Officer at the address, fax number or electronic mail address of the body concerned (*see s 53(1) of PAIA*).

10.2.2. 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 s 53(2)(a) and (b) and (c) and (e) of PAIA*).



10.2.3. 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 s 53(2)(d) of PAIA*).

10.2.4. 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*).

### 10.3. Fees

#### 10.3.1. Request fees:

10.3.1.1. The Information Officer must by notice require the Requester to pay the prescribed request fee (if any) before further processing the request (*see s 54(1) of PAIA*).

10.3.1.2. The fee that the Requester must pay to a private body is R50. The Requester may lodge an application to the court against the tender or payment of the request fee (*See section 54(3)(b) of PAIA*).

#### 10.3.2. Access fees and fees for reproduction:

10.3.2.1. If access to a record/s is granted by Smollan, 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.

10.3.2.2. The access fees which apply are set out below. Smollan can refuse access until such access fees have been paid.

Reproduction		Fee (Rand)
1.	Photocopy of an A4-size page or part thereof provided in hard copy or via scanned copy sent via email	R1.10 per page
2.	Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	R0.75 per page
3.	A copy of, in a computer readable form on compact disc	R70.00
4.	Transcription of visual images on an A4-size page or part thereof	R40.00 per page
5.	Copy of visual images	R60.00
6.	Transcription of an audio record on an A4-size page or part thereof	R20.00
7.	Copy of an audio record	R30.00



#### 10.4. Decision on request

10.4.1. After the Information Officer has made a decision on the request, the Requester will be notified using the required form.

10.4.2. If the request is granted then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure (*see s 54(6) of PAIA*).

### 11. Timelines for consideration of a request

11.1. Requests for access by a Requestor will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is necessary. Such considerations include –

11.2. where the request is for a large number of records or requires a search through a large number of records (including where records that have been archived electronically need to be restored);

11.3. where the request requires a search for records in, or collection of such records from, an office of Smollan located far away from Johannesburg;

11.4. consultation among divisions of Smollan or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original 30-day period;

11.5. more than one of the circumstances contemplated in paragraphs 11.1.1, 11.1.2 and 11.1.3, exist in respect of the request making compliance with the original period not reasonably possible; or

11.6. the Requester consents in writing to such extension.

11.7. If an extension is necessary, you will be notified with reasons for the extension. If the Information Officer fails to communicate a decision on a request, such a request is then deemed to have been refused.

### 12. Grounds for refusal of access to records

12.1. Requests for access by a Requestor **must** be refused by the Information Officer if –

12.1.1. 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);

12.1.2. 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);

- 12.1.3. 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);
  - 12.1.4. the disclosure could reasonably be expected to endanger the life or physical safety of an individual (see section 66(a) of PAIA);
  - 12.1.5. 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
  - 12.1.6. 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).
- 12.2. Requests for access by a Requestor may be refused by the Information Officer if –
- 12.2.1. 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));
  - 12.2.2. the record:
    - 12.2.2.1. contains trade secrets of Smollan;
    - 12.2.2.2. contains 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 Smollan;
    - 12.2.2.3. contains information, the disclosure of which could reasonably be expected:
      - 12.2.2.3.1. to put Smollan at a disadvantage in contractual or other negotiations; or
      - 12.2.2.3.2. to prejudice Smollan in commercial competition; or
    - 12.2.2.4. is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by Smollan, except insofar as it is required to give access to a record to which access is granted in terms of PAIA; or
  - 12.2.3. the record contains information about research being or to be carried out by or on behalf of Smollan, the disclosure of which would be likely to expose: (a) Smollan; (b) a person that is or will be carrying out the research on behalf of Smollan; or (c) the subject matter of the research, to serious disadvantage.



## 13. Remedies available to a requestor on refusal of access

- 13.1. Smollan does not have any internal appeal procedures that may be followed once a request to access information has been refused.
- 13.2. The decision of the Information Officer or deputy information officer is final.
- 13.3. If you are not satisfied with the outcome of your request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

## 14. Other information held by Smollan as prescribed

*(Other information as may be prescribed under section 51(1)(a)(ii))*

The Minister of Justice and Constitutional Development has to date not made any regulations regarding disclosure of other information.

## 15. Availability of the manual

*(Availability of Manual under section 51(3))*

- 15.1. This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of Smollan. Copies of the Manual may be made, subject to the prescribed fees.
- 15.2. Copies may also be requested from the South African Information Regulator.
- 15.3. The Manual is also posted on Smollan's website referred to above.

## 16. Prescribed forms and fee structure

*(Prescribed forms and fee structure in respect of private bodies)*

The forms and fee structure prescribed under PAIA are available from the Government Gazette, or at the website of the Department of Justice and Constitutional Development ([www.doj.gov.za](http://www.doj.gov.za)), under the 'regulations' section as well as the SAHRC website ([www.sahrc.org.za](http://www.sahrc.org.za)).



## ANNEXURE "A" – FORM C – PRESCRIBED FORM TO MAKE REQUEST FOR ACCESS

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY  
(Section 53(1) of the Promotion of Access to Information Act, 2000  
(Act No. 2 of 2000)

[Regulation 10]

### A. Particulars of private body

The Head:

### B. Particulars of person requesting access to the record

- i. The particulars of the person who requests access to the record must be given below.
- ii. The address and/or fax number in the Republic to which the information is to be sent must be given.
- iii. Proof of the capacity in which the request is made, if applicable, must be attached.

**Full names and surname:**

**Identity number:**

**Postal address:**

**Fax number:**

**Telephone number:**

**E-mail address:**

**Capacity in which request is made, when made on behalf of another person:**

### C. Particulars of person on whose behalf request is made

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

Full names and surname:

Identity number:

### D. Particulars of record

- i. 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.
- ii. 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.



- 1 Description of record or relevant part of the record:
- 2 Reference number, if available:
- 3 Any further particulars of record:

**E. Fees**

- i. A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- ii. You will be notified of the amount required to be paid as the request fee.
- iii. 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.
- iv. If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

**F. Form of access to record**

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

Disability:	Form in which record is required
<b>Form in which record is required:</b>	
Mark the appropriate box with an X.	
NOTES: (a) Compliance with your request in the specified form may depend on the form in which the record is available. (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. (c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.	





<b>1. If the record is in written or printed form:</b>					
	copy of record*		inspection of record		
<b>2. If record consists of visual images</b> this includes photographs, slides, video recordings, computer-generated images, sketches, etc)					
	view the images		copy of the images"	transcription of the images*	
<b>3. If record consists of recorded words or information which can be reproduced in sound:</b>					
	listen to the soundtrack audio cassette		transcription of soundtrack* written or printed document		
<b>4. If record is held on computer or in an electronic or machine-readable form:</b>					
	printed copy of record*		printed copy of information derived from the record"	copy in computer readable form* (stiffy or compact disc)	
'If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.				YES	NO

**G Particulars of right to be exercised or protected**

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

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

**H. Notice of decision regarding request for access**

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

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

Signed at..... This..... day of .....20

**SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE**



## ANNEXURE "B" – LIST OF ENTITIES COMPRISING THE SMOLLAN GROUP MEMBERS

NAME OF PRIVATE BODY	REGISTRATION NUMBER	MAIN BUSINESS
<b>Argility Proprietary Limited</b>	2007/010401/07	Data & Tech Company
<b>Chirp Insights Pty Limited</b>	2012/184965/07	Data & Tech Company
<b>Compass Communications Proprietary Limited</b>	2006/015162/07	Promotions Company
<b>Cquential Solutions Proprietary Limited</b>	2005/000855/07	Data & Tech Company
<b>DataOrbis Proprietary Limited</b>	2011/008421/07	Data & Tech Company
<b>Elevator People Proprietary Limited</b>	2013/058527/07	Diversified Services Company
<b>F G Knights Proprietary Limited</b>	2009/014582/07	Diversified Services Company
<b>Fieldmarketing Group Proprietary Limited</b>	1982/006485/07	Diversified Services Company
<b>Fleet Domain Online Systems Proprietary Limited</b>	2009/001373/07	Fleet Management Company
<b>Harding Trend Sales Proprietary Limited</b>	2009/007766/07	Merchandising Sales
<b>IMA SA Proprietary Limited</b>	2015/052885/07	Diversified Services Company
<b>K-Markt Retail Services Proprietary Limited</b>	2009/007151/07	Diversified Services Company
<b>Marketing Transform Proprietary Limited</b>	2016/402986/07	Diversified Services Company
<b>Mediametrics Proprietary Limited</b>	2013/129577/07	Diversified Services Company
<b>NEO Retail Solutions Proprietary Limited</b>	2019/584989/07	Data & Tech Company
<b>Nestdiv Trading Proprietary Limited</b>	2018/062237/07	Diversified Services Company
<b>Parmalat Fieldmarketing Services Proprietary Limited</b>	2000/005053/07	Diversified Services Company
<b>Pioneer Foods Instore Proprietary Limited</b>	1988/004036/07	Diversified Services Company
<b>Precision Collect Proprietary Limited</b>	2013/219410/07	Financial Services Company
<b>Quattro Retail Services Proprietary Limited</b>	2017/513359/07	Diversified Services Company
<b>Retailer Solutions Proprietary Limited</b>	1999/002437/07	Diversified Services Company
<b>Return on Investment Media Proprietary Limited (e-Complete)</b>	2015/073944/07	Data & Tech Company
<b>RTMA Group Proprietary Limited</b>	2015/390944/07	Diversified Services Company
<b>Sea Shadow Trade and Invest 189 Proprietary Limited</b>	2011/008030/07	Diversified Services Company



<b>Skydata Communications Proprietary Limited</b>	1998/012222/07	Data & Tech Company
<b>Smollan Diversified Services Proprietary Limited</b>	1997/010934/07	Diversified Services Company
<b>Smollan Financial Services Proprietary Limited (SFS)</b>	2015/326267/07	Financial Services Company
<b>Smollan Group SA Proprietary Limited</b>	1993/003901/07	Diversified Services Company
<b>Smollan Pharmacy Proprietary Limited</b>	2010/023065/07	Diversified Services Company
<b>Smollan Properties Proprietary Limited</b>	1985/005243/07	Property Holding Company
<b>Smollan SA Services Proprietary Limited</b>	2009/004987/07	Diversified Services Company
<b>Smollan Sales and Marketing Proprietary Limited</b>	1971/012582/07	Diversified Services Company
<b>Student Village Proprietary Limited</b>	2006/005416/07	Diversified Services Company
<b>TDFS Operations Proprietary Limited</b>	2000/010528/07	Diversified Services Company
<b>The Retail Workshop Proprietary Limited</b>	2010/003993/07	Diversified Services Company
<b>Tshimedzwa Cellular Proprietary Limited</b>	2015/137308/07	Mobile Services Company
<b>Tshimedzwa Talent Solutions Proprietary Limited</b>	1981/001818/07	Recruitment Company
<b>Tshimedzwa Development Centre Proprietary Limited</b>	2015/137671/07	Learning and Development Company
<b>Tshimedzwa Field Services Proprietary Limited (previously called Tshimedzwa Learning Academy Pty Ltd)</b>	2015/137656/07	Learning & Development Company
<b>Retail Marketing Services Proprietary Limited</b>	2001/003889/07	Diversified Services Company
<b>Smollan Holdings Proprietary Limited</b>	1981/001679/07	Investment Holding Company
<b>Smollan Global Services Proprietary Limited</b>	2000/006179/07	Diversified Services Company
<b>Ashanti Ai Proprietary Limited</b>	2017/364102/07	Data & Tech Company
<b>RCA Marketing Proprietary Limited</b>	2011/011670/07	Diversified Services Company