



**Manual Prepared in Terms of Section 51 of
the Promotion of Access to Information Act, 2
of 2000**



TABLE OF CONTENTS

1. Definitions
2. Introduction
3. Purpose of PAIA Manual
4. Company Details
5. Duties of the Information Officer
6. Contact Details of the Information Officer and Deputy Information Officer(s)
7. Guide on How to Use PAIA and How to Obtain Access to the Guide
8. Categories of Records of Valyoo Which Are Available Without a Person Having to Request Access
9. Description of the Subjects on Which the Body Holds Records and Categories of Records Held on Each Subject by Valyoo
10. Access to Information or Records Held by Valyoo
11. Request for Information Procedure
12. Fees
13. Grounds for Refusal
14. Mandatory Disclosure of Records in Public Interest
15. Third Party Notification Process
16. Remedies
17. Processing of Personal Information
18. Availability of this Manual
19. Updates to this Manual

1. Definitions

“Access Fee” means a fee prescribed for the purposes of section 22(6) or 54(6), as the case may be

“Consent” means any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information.

“Constitution” means the Constitution of the Republic of South Africa, 1996.

“Data Subject” means the person to whom personal information relates.

“Deemed Refusal” means an instance when a response to a request is not received within the prescribed time.

“Information Officer” means the person authorised to handle PAIA requests as per the following categories:

No.	Type of Entity	Information
1.	Natural Person	Sole proprietor who carries on any trade business or profession, but only in such capacity and not in their personal capacity
2.	Partnership	Any partner of the partnership of any person duly authorised by the partnership.
3.1	Juristic Person	The Chief Executive Officer or the Managing Director or equivalent officer of the juristic person or any person duly authorised by that officer or any person who is acting as such or any person duly authorised by such acting person.

“Person” means a natural person or a juristic person

“Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- (a) 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;
- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) 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;
- (g) the views or opinions of another individual about the person; and
- (h) 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.

“Private Body” means-

- (a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- (b) a partnership which carries or has carried on any trade, business, or profession; or
- (c) any former or existing juristic person, but excludes a public body

“Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including-

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- (b) dissemination by means of transmission, distribution or making available in any other form; or
- (c) merging, linking, as well as restriction, degradation, erasure, or destruction of information.

“Promotion of Access to Information Act” means the Promotion of Access to Information Act, 2 of 2000

“Record” of, or in relation to, a public or private body, means any recorded information –

- (a) regardless of form or medium;
- (b) in the possession or under the control of that public or private body respectively; and
- (c) whether or not it was created by that public or private body, respectively

“Regulator” means the Information Regulator established in terms of section 39 of PAIA

“Responsible Party” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;

“Request for Access” means a request for access to a record of a private body in terms of section 50 of PAIA.

“Requestor”, in relation to-

- (a) A private body, means-
 - (i) Any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or
 - (ii) A person acting on behalf of the person contemplated in subparagraph (i).

“Third Party”, in relation to a request for access to-

- (a) A record of a private body, means any person (including, but not limited to, a public body) other than the requester,

1.1 LIST OF ACRONYMS AND ABBREVIATIONS

The Promotion of Access to Information Act, 2 of 2000	PAIA
The Protection of Personal Information Act, 4 of 2013	POPIA
The South African Human Rights Commission	SAHRC

1.2 Interpretation

- Any reference to any statute, regulation, or other legislation shall be a reference to that statute, regulation, or other legislation as at the signature date, and as amended or substituted from time to time
- If any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this Manual
- Where any term is defined in a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this document
- Where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day
- Any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months, or years, as the case may be
- Insofar as there is a conflict in the interpretation of or application of this Manual and the Act, the Act shall prevail
- This manual does not purport to be exhaustive of or to comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarise themselves with the provisions of the Act before lodging any request

2. INTRODUCTION

PAIA gives effect to the right to access to information in terms of section 32 of the Constitution. This section provides everyone the right to access to information held by the state or any other person (or private body) when the information is required for the exercise or protection of any rights.

Section 51 of PAIA requires all private bodies to compile a PAIA Manual that provides information on both the types and categories of records held by the private body.

The purpose of PAIA is to:

- Foster a culture of transparency and accountability in public and private bodies by giving effect to the right to access to information, and to;
- Actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all their rights more fully.

POPIA is South African data privacy Legislation that regulates the processing of personal information of data subjects (both personal and juristic) by responsible parties.

The purpose of the Act is to:

- Give effect to the constitutional right to privacy, subject to justifiable limitations aimed at balancing the right to privacy against other rights.
- Regulate the processing of personal information in harmony with international standards.
- Provides minimum requirements for the lawful processing of personal information.
- Provides rights and remedies to protect against abuses of personal information .

POPIA has amended the role of the SAHRC. In terms of POPIA the function of the SAHRC in terms of PAIA has been transferred to the Information Regulator who will be empowered to monitor both POPIA and PAIA and to handle complaints relating to access to information and the protection of personal information.

This Manual provides and outlines the types of records held by Valyoo and explains how requesters may submit requests to the records held in terms of PAIA. It further allows requesters to request access, object and request a correction of their personal information in terms of the requirements of POPIA.

Valyoo recognises everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements set out by PAIA and POPIA have been met.

3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- Establish the nature of the records which may already be available without the need for submitting a formal PAIA request.
- Have a sufficient understanding of how to make a request for access to a record of Valyoo, by providing a description of the subjects on which Valyoo holds records and the categories of records held on each subject.
- Know the description of the records of Valyoo which are available in accordance with any other legislation.
- Know the description of the services available to members of the public from Valyoo and how to gain access to those services.
- Access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access.
- Know if Valyoo will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- Know the description of the categories of data subjects and of the information or categories of information relating thereto.
- Know the recipients or categories of recipients to whom the personal information may be supplied.
- Know if Valyoo has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- Know whether Valyoo has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. COMPANY DETAILS

Valyoo is a boutique accountancy practice servicing businesses and individuals in the Cape Winelands in the Western Cape. As an outsourced solution, Valyoo offers a full suite of services to assist businesses to run as efficiently as possible.

Company Name:	Valyoo (Pty) Ltd
Registration Details:	2017/163726/07
Registered Address:	Vlottenburg Farm Van Ryn Road Stellenbosch 7604
Postal Address:	PO Box 12 Vlottenburg 7604
Contact Number:	073 411 7077
Website:	www.valyoo.co.za

5. DUTIES OF THE INFORMATION OFFICER

5.1 The Information Officer of Valyoo is responsible for:

- Encouraging compliance with the conditions for the lawful processing of personal information
- Facilitation of requests made to Valyoo in terms of PAIA and POPIA
- Providing adequate notice and feedback to the requester
- Ensuring compliance with the provisions of PAIA and POPIA
- Developing, monitoring, maintaining, and making this Manual available
- Developing internal measures together with adequate systems to process requests for the information or access thereto
- Holding internal awareness sessions regarding the provisions of PAIA and POPIA, regulations in terms of PAIA and POPIA, Codes of Conduct or information obtained from the Regulator
- When requested, providing copies of this Manual upon payment of a fee to be determined by the Regulator.
- Determining whether to grant a request for access to a complete/full record or only part of a record.
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format
- Reviewing this Manual for accuracy and communicating any amendments

5.2 The Information Officer may only provide access to any record held by Valyoo if:

- The record is required for the exercise or protection of any right; and
- The requester complies with the procedural requirements relating to a request for access to that record, and
- Access to that record is not refused in terms of any of the listed grounds for refusal listed in this Manual.

6. Contact Details of the Information Officer

Information Officer

Name:	Liezl Roux
Designation:	Director
Address:	Vlottenburg Farm Van Ryn Road Stellenbosch 7604
Telephone:	073 411 7077
Email:	liezl@valyoo.co.za

7. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

7.1 The 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.

7.2 The Guide is available in each of the official languages and in braille.

7.3 The Guide contains the description of-

- The objects of PAIA and POPIA
- The manner and form of a request for-
 - Access to a record of a public body contemplated in section 11 of PAIA; and
 - Access to a record of a private body contemplated in section 50 of PAIA
 - The assistance available from the Information Officer of a public body in terms of PAIA and POPIA
 - The assistance available from the 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 Regulator; and
 - An application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body
- The provisions of sections 14 and 51 of PAIA requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- The provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- 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.

7.4 Members of the public can inspect or make copies of the Guide from the offices of Valyoo and the office of the Regulator, during normal working hours.

7.5 The Guide can also be obtained-

- From the Government Gazette
- Upon request to the Regulator, on a form which corresponds substantially with Form 1 of Annexure A to the Regulations
- Upon request to the Information Officer of Valyoo;
- From the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

7.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

- English
- Afrikaans

8. CATEGORIES OF RECORDS OF VALYOO WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

8.1 Currently, no notice(s) has/have been published by the Minister on the categories of information available without a person having to request access in terms PAIA.

8.2 There are however some records which are freely available to the public. These are mainly records which are available on our website which a person can download, request telephonically or by sending an email or letter.

9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY VALYOO

This section sets out the records and the categories of records held on each subject.

Subjects on Which the Body Holds Records	Categories of Records
Statutory Company Information	Certificate of Incorporation
	Memorandum and Articles of Association
	Financial Statements
	Books of Account Regarding Information Required by the Companies Act
	Supporting Schedules to Books of Account and Ancillary Books of Account
Accounting Records	Books of Account Including Journals and Ledgers
	Invoices, Delivery Notes, Statements and Receipts
Intellectual Property	Trade Names
Taxation	Copies of All Income Tax Returns and Other Tax Returns and Documents
Insurance	Insurance Policies
	Claim Records
	Brochures, Newsletters and Advertising Materials
Business Records	Website Content
	Information Technology Records
	Environmental, Health and Safety Records
	Audit Records of Clients
	Service Level Agreements/Contracts
Supply Chain Matters	Confidential Client Communications
	Quotations and proposals

10. ACCESS TO INFORMATION OR RECORDS HELD BY VALYOO

Access to information can only be granted once the requirements for access have been met.

PAIA provides that a person may only request information from a Private Body if the requested information is required for the exercise or protection of a right. POPIA provides that a Data Subject may request a Responsible Party to confirm, free of charge, all the information it holds about the Data Subject and may request access to such information, including the information of third parties who have or have had access to such information. Where a Data Subject is required to pay a fee for any request for access services, the Responsible Party:

- Must provide the Data Subject with a written estimate of the payable amount before providing the service
- May require the requester to pay a deposit for all or part of the fee

If the Information Officer is unable to find the records requested or believe that the records do not exist, they will submit a detailed affidavit or affirmation to the requester giving notice that the records in question do not exist or cannot be found. The Information Officer will outline the steps they took to locate them.

11. REQUEST FOR INFORMATION PROCEDURE

11.1 To facilitate a request for information, the following procedures apply:

- The requester must complete Form 2. Once completed, the requester must email or post it to the Information Officer at the addresses set out in this manual.
- The Information Officer will notify the requester that the request has been received and if the request is granted or refused and an estimate of the costs associated with processing the request, if any.
- The list of fees payable is set out in section 12 of this manual.

11.2 Valyoo will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Information Officer that circumstances dictate that this period is not be complied with.

11.3 Valyoo may request an extension to the time, but will only be able to do so if:

- The request is for a large number of records or requires that a large number of records are searched, and, without an extension, the search would interfere with the normal activities of Valyoo
- The request requires a search through records in an office of Valyoo that is not in the same city or town and could thus not be completed within 30 days; and/or
- It requires a level of consultation to act on the request, which cannot reasonably be completed within 30 days.

Valyoo will notify the requester of their intention to extend the initial time, and indicate the period of extension, the reason for the extension, and advise the requester that they have the right to –

- Appeal to the relevant authority
- Lodge a complaint with the regulator; or
- Institute proceedings in court against the extension as the case may be

Valyoo will also inform the requester of the process to be followed for each of the above-mentioned rights in the notice.

11.4 A requester is any person making a request for access to a record of Valyoo and in this regard, PAIA distinguishes between two types of requesters for access to information as set out below.

11.4.1 a data subject is a requester who, having provided adequate proof of identity, is seeking access to a record containing personal information about the data subject. Subject to the provisions of PAIA and POPIA, Valyoo will provide the requested information, or give access to any record with regard to the data subject's personal information within a reasonable time, (at a prescribed fee, if any) in a reasonable manner and format and in a form that is generally understandable. The prescribed fee for reproduction of the personal information requested will be charged by Valyoo.

11.4.2 A person falling in the category of "Other Requester" is entitled to request access to information pertaining to third parties. However, Valyoo is not obliged to grant access prior to the requester fulfilling the requirements for access to information in terms of PAIA and POPIA.

11.5 Once a request has been processed, the Information Officer will inform the requester of the outcome of the request and whether any additional information or fees are required.

If the requester does not use Form 2, we may:

- Reject the request due to a lack of procedural compliance; or
- Refuse the request if sufficient information is not provided.

11.6 Notes for Requesters

When requesting information, the following must be followed:

- Ensure the form is completed in as much detail as possible.
- Provide an accurate description of the record(s) sought.
- Identify the requester.
- Specify the format in which the information is required.
- Indicate the contact details of the person requiring information.
- Indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed.
- The requester must identify the right that is sought to be exercised or to be protected and to provide an explanation of why the requested record is required.
- If applicable, the requester must provide any other way in which they wish to be informed other than in writing.
- Provide proof of capacity in which they are making the request if the request is being made on behalf of someone else.

12. FEES

PAIA prescribes certain fees that are payable for requests made in terms of the Act.

The requestor must request the banking details of Valyoo from the Information Officer and make payment if required. The processing will not commence until the fees are paid.

The following fees are applicable:

Item	Description	Amount
1.	The request fee payable by every requestor	R140.00
2.	Photocopy/printed black and 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 a flash drive (to be provided by the requestor)	R40.00
5.	For a copy in a computer-readable form on a compact disc if provided by the requestor	R40.00
6.	For a copy in a computer-readable form on a compact disc if provided to the requestor	R60.00
7.	For a transcription of visual images per A4-size page	Service to be outsourced, will depend on quotation from service provider
8.	Copy of visual images	

9.	Transcription of an audio record, per A4-size page	R24.00
10.	Copy of an audio record on a flash drive (to be provided by the requestor)	R40.00
11.	Copy of an audio record on a compact disc if provided by the requestor	R40.00
12.	Copy of an audio record on a compact disc if provided to the requestor	R60.00
13.	To search for an prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00 (not to exceed R435.00)
14.	Deposit – if search exceed 6 hours	One third of the amount per request calculated in terms of items 2 – 12 above.
15.	Postage, email, or any other electronic transfer	Actual expense if any

13. GROUNDS FOR REFUSAL

If a request for access is refused, Valyoo will advise the requester about the reason for refusal of access and may advise the requester to lodge an application with the court against the refusal for such request.

Chapter 4 of PAIA provides reasons for refusal. Note that these reasons do not mean that requests of such nature will be refused, it just means that access may be granted for such reasons.

The following may be reasons for refusal:

13.1 Mandatory Grounds for Refusal

With mandatory grounds for refusal, Valyoo must refuse the request. The following are mandatory grounds for refusal:

- The mandatory protection of privacy of a third party who is a natural person if the disclosure would involve the unreasonable disclosure of personal information about a third party, including a deceased individual
- The mandatory protection of commercial information of a third party if it contains
 - Trade secrets of a third party
 - 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
 - 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.

- The mandatory protection of certain confidential information of third parties if the disclosure of the record would constitute an action for breach of confidence owed to a third party in terms of an agreement.
- The mandatory protection of safety of individuals, and protection of property
- Mandatory protection of records privileged from production in legal proceedings
- The mandatory protection of research information of a third party, and protection of research information of Valyoo if such disclosure would place the research or the researcher at a serious disadvantage
- A record of Valyoo if the record consists of information that was supplied in confidence by a third party if the disclosure of which could reasonably be expected to prejudice the future supply of similar information, or information from the same source and if it is in the public interest that similar information, or information from the same source, should continue to be supplied.

13.2 Discretionary Grounds of Refusal

With discretionary grounds of refusal, the Information Officer must apply their minds and consider whether to refuse a request because of the following reasons:

- Economic, financial, and commercial interests of Valyoo, which may include
 - trade secrets
 - 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 Valyoo
 - contains information, the disclosure of which could reasonably be expected-
 - to put a public body at a disadvantage in contractual or other negotiations; or
 - to prejudice a public body in commercial competition; or
 - Computer programs owned by Valyoo which are protected by copyright and intellectual property laws
- Requests that are manifestly frivolous or vexatious, or which involves substantial and unreasonable diversion of resources

Note that if only part of a record is linked to an exemption ground, Valyoo is obliged to consider whether partial disclosure or information is possible whenever they determine that full disclosure is not possible and Valyoo will take reasonable steps to sever or redacts the part or parts that cannot be released to the requester and grant access to the rest of the record.

14. MANDATORY DISCLOSURE OF RECORDS IN THE PUBLIC INTEREST

Even if a discretionary or mandatory ground for refusal exists in relation to a request for access to records, there is the possibility that public interest in the disclosure of the record may be more important than the harm created by the release of the record.

Where the important of the public interest exists as stated above and the disclosure of the record would reveal:

- Evidence of a substantial contravention of or failure to comply with the law; or
- An imminent and serious public safety or environmental risk

Then Valyoo must grant access to the record despite the existence of the exemption grounds.

15. THIRD PARTY NOTIFICATION PROCESS

Valyoo is required, to take reasonable steps to inform a third party about a request for their record or records that might be a record that contains either:

- Personal information
- A SARS record
- Trade secrets
- Information, the release of which could constitute grounds for an action for breach of a duty of confidence; or research information that could expose someone or the subject matter to serious damage

The third party will be requested to:

- Make written or oral representation to the Information Officer why the request for access should be refused; or
- Give written consent for the disclosure of the record to the requester

Valyoo will inform the requester that a notice has been sent to a third party. Once this notification has been sent, Valyoo must make a final decision on whether to release the records within 30 days.

16. REMEDIES

Valyoo does not have an internal appeal procedure in relation to POPIA and PAIA. As such, the decision made by the Information Officer is final.

A requester may, amongst others, challenge the following decision of Valyoo:

- The tender or payment of the request fee
- The tender or payment of a deposit
- The access fee to be paid is too excessive
- The form of access granted
- The refusal of a request
- The procedure (including the period) for lodging the internal appeal
- Inappropriate time extension taken to respond to request for access
- Failure to disclose records
- The granting of a request for access to a record
- Refusal to grant a request to waive the fees

If a requester is unhappy with the decision, they may

- apply to a court for relief
- lodge a complaint with the information regulator

This must be done within 180 days of the decision from Valyoo.

A requester may lodge a complaint with the regulator, if they are not happy with a decision of Valyoo to:

- Refuse a request for access
- Demand payment of the request fee, or a deposit of the access fee
- Extend a period to deal with a request
- Grant access in a particular form

16.1 How to Complain to the Regulator

A complaint to the Regulator must be made in writing and a complaint form (Form 5) must be completed either manually or online.

17. PROCESSING OF PERSONAL INFORMATION

17.1 Purpose of Processing Personal Information

Unless otherwise stated specifically the information may be used for the following purposes:

- To administer a service to you
- To provide you with advice
- Share information with you (One Drive/Dropbox)
- Provide shared software access with you (Xero, Sage etc)
- To gather contact information
- To improve our services
- To respond to your enquiries and/or requests
- Internal accounting and administration
- Identification of fraud and error
- Regulatory reporting and compliance
- To comply with our legal obligations

17.2 Description of the Categories of Data Subjects and of the Information or Categories of Information Relating Thereto

The following personal information of the categories mentioned in the table may be processed by Valyoo.

Category	Type of Personal Information
Clients/Customers + Prospective Clients/Customers	Name and surname, ID number, tax number, company registration number, VAT number, residential address, company address, postal address, email address, contact details, tax certificates, bank details, medical details, disability, statements of assets and liabilities, trust details, UIF, SDL and PAYE information, retirement annuity, pension fund and provident fund details, information in wills, accounting records (income, expenses etc), tax records (E-filing submissions), remuneration and benefit information, FICA documentation
Suppliers/Service Providers	Bank details, names and surnames of representatives, address, contact details, email address, VAT number
Children	Disability, ID number, birth certificate, passport photographs
Visitors to website	Client name and contact details
Directors and Shareholders	Name and surname, contact details, identity number, address (postal and physical), email address, date of birth, marital status, race, disability information, banking details, remuneration and benefit information, income tax numbers
Employees of Clients/Customers	name and surname, contact details, identity number, address (postal and physical), email address, date of birth, disability information, banking details, remuneration and benefit information, income tax numbers, medical information

17.3 The Recipients or Categories of Recipients to Whom the Personal Information May be Supplied

The table below specifies the person or category of persons to whom Valyoo may disseminate personal information.

Category of Personal Information	Persons to Whom the Information May be Supplied
Customer name, registered address, contact number for deliveries	Courier companies
Invoices and accounting records	Accountants
Bank details for payments	Banking institutions

17.4 Planned Transborder Flows of Personal Information

In certain instances, Valyoo may disclose your personal information to third parties that are based in foreign countries.

The transfer of this information will only be completed if:

- the third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection.
- The Data Subject consents to such transfer.
- The transfer is necessary for the performance of a contract between the Data Subject and Valyoo, or for the implementation of pre-contractual measures taken in response to a request from a Data Subject
- the transfer is necessary for the conclusion or performance of a contract concluded between Valyoo and the third party that is in their interest; or
- The transfer is for the benefit of the Data Subject and
 - it is not reasonably practicable to obtain the consent of the Data Subject to that transfer; and
 - if it were reasonably practicable to obtain such consent, the Data Subject would be likely to give it.

Although Valyoo will take every precaution, it is possible that personal information will be transferred to a third party in a foreign country that is in a jurisdiction where a Data Subject will not be able to seek redress under POPIA and does not have an equivalent level of data protection as in their jurisdiction. Valyoo will not be held liable for how such third parties process such personal information.

17.5 Security Measures

Valyoo is committed to protecting the security of personal information. While no security measures can guarantee against compromise, Valyoo uses a variety of security technologies and procedures to help protect data from unauthorised access, use, or disclosure.

Valyoo holds personal information in:

- Computer systems
- Electronic databases
- In hard copy or paper files

Valyoo has implemented and maintains appropriate technical and organisational measures to ensure a level of security appropriate to protect personal information and prevent:

- loss of, damage to or unauthorised destruction of personal information; and
- unlawful access to or processing of personal information.

Valyoo's website is protected by secure SSL server, and we have antivirus software as well as firewalls in place for further protection.

18. AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- On the Valyoo website at www.valyoo.co.za
- At the principal place of business for public inspection during normal business hours;
- In hard copy to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

19. UPDATING OF THE MANUAL

Valyoo will on a regular basis update this manual.

Issued by

A handwritten signature in black ink, appearing to read "L. Roux", is written above a horizontal line.

Liezl Roux

Director