



**THE PROMOTION OF ACCESS TO INFORMATION ACT NO 2 OF 2000:
ACCESS TO INFORMATION MANUAL FOR ASTRON ENERGY PROPRIETARY
LIMITED**

Version 2, July 2025



TABLE OF CONTENTS

PART A - GENERAL	3
1 DEFINITIONS	3
2 STRUCTURE OF THIS MANUAL	5
3 INTRODUCTION	5
4 THE PURPOSE AND SCOPE OF THIS MANUAL	5
5 AVAILABILITY OF THE MANUAL	6
6 UPDATING OF THIS MANUAL	7
7 OVERVIEW OF ASTRON ENERGY	7
8 CONTACT DETAILS FOR ASTRON ENERGY	7
9 GUIDE BY THE REGULATOR AND THE REGULATOR'S DETAILS	8
PART B - RECORDS	8
10 AUTOMATICALLY AVAILABLE RECORDS	8
11 RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION	9
12 DESCRIPTION OF THE TYPES OF RECORDS / SUBJECTS OF INFORMATION WHICH WE HOLD	10
PART C – PERSONAL INFORMATION	16
14 THE PURPOSE OF THE PROCESSING THAT WE DO	16
15 CATEGORIES OF DATA SUBJECTS AND TYPES OF PERSONAL INFORMATION	19
16 DISCLOSURE OF PERSONAL INFORMATION	22
17 TRANSFER OF PERSONAL INFORMATION OUTSIDE OF SOUTH AFRICA	23
18 GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES	24
19 SECURITY COMPROMISE	24
20 EXERCISE OF A RIGHT IN TERMS OF POPIA	25
PART D - ACCESS TO RECORDS	26
21 PAIA - HOW TO REQUEST ACCESS TO A RECORD	26
22 PAYMENT OF FEES	27

23	APPLICABLE TIME PERIODS	27
24	OUTCOME OF THE REQUEST (GRANTING OR REFUSING).....	27
25	GROUND FOR REFUSAL OF ACCESS TO RECORDS	28
26	REMEDIES FOR REFUSAL.....	28

ANNEXURES

ANNEXURE A – REQUEST FOR ACCESS

ANNEXURE B – OBJECTION AND CORRECTION OR DELETION FORMS

ANNEXURE C – FEES



PART A - GENERAL

1 DEFINITIONS

Terms and words which are not defined in this Manual shall bear the meanings ascribed to such terms in the SA Information Legislation. The following words and expressions shall bear the meanings assigned to them below and cognate words and expressions bear corresponding meanings -

- 1.1 **"Astron Energy"**, **"we"**, **"us"** or **"our"** - Astron Energy Proprietary Limited, registration number 1911/001154/07;
- 1.2 **"Constitution"** - the Constitution of the Republic of South Africa, 1996;
- 1.3 **"Employee"** - a current or former employee (temporary or permanent and irrespective of contract type), partner, worker, intern, agency worker, consultant, individual / independent contractor, and / or director;
- 1.4 **"External Parties"** - service providers, suppliers, customers, branded marketers, franchisees, requesters in terms of PAIA, Data Subjects enacting their rights in terms of POPIA, other complainants and enquirers, website users, job applicants, premises visitors and information technology (**"IT"**) users, direct marketing recipients;
- 1.5 **"External Privacy Notice"** - the privacy notice provided to External Parties in terms of which they are notified of the processing of their Personal Information;
- 1.6 **"Guide"** - the guide initially published by the South African Human Rights Commission and updated by the Regulator in terms of section 10 of PAIA;
- 1.7 **"Internal Privacy Notice"** - the privacy notice provided to Employees in terms of which they are notified of the processing of their Personal Information and the terms thereof;

- 1.8 **"Information Officer"** - Astron Energy's information officer whose details appear at 8.2;
- 1.9 **"Manual"** - this manual, prepared in accordance with section 51 of PAIA, as updated or amended from time to time;
- 1.10 **"PAIA"** - the Promotion of Access to Information Act No 2 of 2000 and its regulations, as amended from time to time;
- 1.11 **"person"** or **"entity"** - includes any natural or juristic person, association, business, close corporation, company, concern, enterprise, firm, partnership, joint venture, trust, undertaking, voluntary association, body corporate, and any similar entity, in any jurisdiction;
- 1.12 **"Personal Information"** - any information relating to a natural or juristic person (**"Data Subject"**) which identifies or can be used to identify such person, excluding completely anonymous information;
- 1.13 **"POPIA"** - the Protection of Personal Information Act No 4 of 2013 and its regulations, as amended from time to time;
- 1.14 **"process"** - any operation or activity or any set of operations concerning Personal Information as defined in POPIA and including the collection, storage and distribution of Personal Information, and **"processing"** and **"processed"** should be construed accordingly;
- 1.15 **"SA Information Legislation"** - collectively, POPIA and PAIA;
- 1.16 **"South Africa"** - the Republic of South Africa;
- 1.17 **"Regulator"** - the Information Regulator established in terms of POPIA;
- 1.18 **"Security Compromise"** - where an unauthorised person accesses or acquires your Personal Information; and

- 1.19 "you" – includes a Requester or Data Subject, as the context may indicate, and "your" should be construed accordingly.

2 STRUCTURE OF THIS MANUAL

- 2.1 Part A deals with general matters.
- 2.2 Part B deals with records.
- 2.3 Part C deals with POPIA and Personal Information.
- 2.4 Part D deals with access to records in terms of PAIA.

3 INTRODUCTION

- 3.1 PAIA gives effect to each person's constitutional right to access information held by any person, where such information is required for the exercise or protection of any rights.¹ On the other hand, POPIA gives effect to each person's constitutional right to privacy² and promotes the protection of Personal Information processed by public and private bodies; and introduces conditions for the lawful processing of Personal Information.³
- 3.2 SA Information Legislation is applicable to us because we are a private body registered and operating in South Africa.

4 THE PURPOSE AND SCOPE OF THIS MANUAL

- 4.1 In terms of PAIA, we are required to compile and publish this Manual, containing the information provided for herein. This Manual, amongst others, -
- 4.1.1 identifies and contains the details of our Information Officer;

¹ The Constitution, section 32(1)(b), read with PAIA long title.

² The Constitution, section 14.

³ POPIA, preamble.

- 4.1.2 indicates the types of records we hold and the availability of such records, including which records are available without submitting a formal PAIA request ("**Request**") and which records are kept in accordance with other legislation;
 - 4.1.3 is a guide to Requesters on how to access records which we hold;
 - 4.1.4 tells you about the Guide and how to access it;
 - 4.1.5 contains a description of whose Personal Information we process, why we process it and how we protect and secure Personal Information;
 - 4.1.6 tells you who we share Personal Information with and where we share it with anyone outside of South Africa; and
 - 4.1.7 explains how someone who is our Data Subject can enforce their rights in terms of POPIA.
- 4.2 This Manual is not exhaustive of, nor does it comprehensively deal with, every right or remedy you may have, or procedure provided for, in SA Information Legislation. You are advised to refer to SA Information Legislation for your comprehensive rights or remedies in terms of such legislation.
- 4.3 We will assist you with completing any necessary forms required to exercise any rights you may have in terms of SA Information Legislation.
- 4.4 We make no representation, undertaking or warranty that the information in this Manual or any information provided by us is complete, accurate, or fit for purpose. We will not be liable for any loss, damage, expense, liability or claim, howsoever arising, resulting from the use of any such information.

5 AVAILABILITY OF THE MANUAL

This Manual is available in electronic and hard copy in English. The hard copy is available at the address indicated at 8.1. The electronic version of this Manual is available on our website at the following hyperlink: <https://www.astronenergy.co.za/about-us/policies-procedures/>.

6 UPDATING OF THIS MANUAL

- 6.1 This Manual will be reviewed when necessary, but at least once per year.⁴ The Manual will be updated from time to time.
- 6.2 Depending on our relationship with you, you may not be notified by us if this Manual changes; we will however upload an updated version of this Manual on our website. **It is your responsibility to ensure that you are familiar with this Manual and that you check the website to make sure that you are referring to the latest version.**
- 6.3 The last date of update and version number is indicated on the cover page.

7 OVERVIEW OF ASTRON ENERGY

Astron Energy is a supplier of fuel petroleum products in Southern Africa. Our offering includes the operation of a crude oil refinery, lubricants manufacturing plant and product supply network across various terminals in Southern Africa.

8 CONTACT DETAILS FOR ASTRON ENERGY⁵

- 8.1 Our contact details are as follows:

Email:	CRM@astronenergy.co.za
Telephone No.:	+27 21 403 7911
Registered Office:	5 Century Boulevard, Century City, Cape Town, 7441
Postal Address:	As above.

⁴ PAIA, section 51(2).

⁵ PAIA, section 51(1)(a)(i) as read with the *Guidance Note on Information Officers and Deputy Information Officers* published by the Regulator.

8.2 Our Information Officer's details are as follows:

Information Officer:	Thabiet Booley
Deputy Information Officer:	Lizel Oberholzer
Email:	privacy@astronenergy.co.za
Telephone No.:	+27 21 403 7911
Physical and Postal Address:	5 Century Boulevard, Century City, Cape Town, 7441

8.3 Should you wish to enact any right in terms of SA Information Legislation, or otherwise have any other records or information processing related query, please contact our Information Officer.

9 GUIDE BY THE REGULATOR AND THE REGULATOR'S DETAILS⁶

9.1 The Guide contains information which may be reasonably required by a person who wishes to exercise a right conferred on them in terms of the SA Information Legislation.⁷

9.2 You can access the Guide at <https://inforegulator.org.za/training/wp/paia-guidelines/> or by request to the Information Officer.

PART B - RECORDS

10 AUTOMATICALLY AVAILABLE RECORDS⁸

10.1 As at the date that this Manual was last updated, no notices have been published by the Regulator on the categories of records which are automatically available without a person having to request access thereto in terms of PAIA.

10.2 No records are automatically available on our website, and it is therefore necessary to apply for access for any records in terms of PAIA. Where you are our Employee, your records can be requested through the appropriate human resources channels.

⁶ PAIA, section 51(1)(b)(i).

⁷ PAIA, section 10(1).

⁸ PAIA, section 51(1)(ii).

Please feel free to contact our Information Officer if you require guidance in this regard.

11 RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION⁹

Records are kept in accordance with legislation as is applicable to Astron Energy, which may include (but is not limited to) the following legislation:

No	Category of Records	Legislation
1	Employment records	<ul style="list-style-type: none"> • Basic Conditions of Employment Act No 75 of 1997 • Employment Equity Act No 55 of 1998 ("EEA") • Labour Relations Act No 66 of 1995 • Unemployment Insurance Act No 63 of 200 • Unemployment Insurance Contributions Act No 4 of 2002
2	Employee benefits records	Pension Funds Act No 24 of 1956
3	B-BBEE records	Broad-Based Black Economic Empowerment Act No 53 of 2003
4	Company records	Companies Act No 61 of 1973
5	Compensation records	Compensation for Occupational Injuries and Diseases Act No 130 of 1993 ("COIDA")
6	Competition records	Competition Act No 89 of 1998
7	Electronic communications records	Electronic Communications and Transactions Act No 2 of 2000
8	Compliance records	Financial Intelligence Centre Act No 38 of 2001
9	Tax records	<ul style="list-style-type: none"> • Income Tax Act No 58 of 1962 • Tax Administration Act No 28 of 2011 • Value-Added Tax Act No 89 of 1991
10	Records relating to insolvency	Insolvency Act No 24 of 1936
11	Health and safety records	Occupational Health and Safety Act No 85 of 1993
12	Environmental and fuel related records	<ul style="list-style-type: none"> • Environment Conservation Act No 73 of 1989

⁹ PAIA, section 51(1)(b)(iii).

No	Category of Records	Legislation
		<ul style="list-style-type: none"> • Gas Act No 48 of 2001 • Mineral and Petroleum Resources Development Act No 28 of 2002 • National Environmental Management Act No 107 of 1998 • National Water Act No 36 of 1998 • Petroleum Pipelines Act No 60 of 2003 • Petroleum Products Act No 120 of 1977
13	Occupational training and qualification records	<ul style="list-style-type: none"> • Skills Development Act No 97 of 1998 • Skills Development Levies Act No 9 of 1999
14	PAIA compliance records	PAIA
15	Privacy policy, other policies, requests and compliance records	POPIA
16	Records relating to any criminal offences reported under the Prevention of Organised Crime Act No 121 of 1998 ("POCA")	POCA
17	Records relating to intellectual property	<ul style="list-style-type: none"> • Copyright Act No 98 of 1978 • Trade Marks Act No 194 of 1993
18	Consumer protection records	Consumer Protection Act No 68 of 2008
19	Various	Such other legislation as may from time to time be applicable

12 DESCRIPTION OF THE TYPES OF RECORDS / SUBJECTS OF INFORMATION WHICH WE HOLD¹⁰

The following table contains a description of the types of records / subjects of information which Astron Energy holds, and the categories of records held on each subject:

No	Subject	Description of record
1	RETAIL	
1.1	Network and Business Support	<ul style="list-style-type: none"> • Royalties • Advertising Fund Contributions • Management service fees

¹⁰ PAIA, section 51(1)(b)(iv).

No	Subject	Description of record
		<ul style="list-style-type: none"> • Franchise Advisory Council records • Branded marketer records • Records of marketing campaigns, including radio and social media campaigns • Strategic partnership records • Network planning and development records • Correspondence with marketers and employees within Astron Energy relation to relating to marketing • Business development plans and records (Hubspot)
1.2	Property and Facilities Optimisation	<ul style="list-style-type: none"> • Lease agreements • Supply and sales agreements • Franchise agreements • Title deeds • Service station site files
1.3	Customer Service Centre	<ul style="list-style-type: none"> • Customer data, including name and surname • CD records/audio recordings • Customer agreements • E-mails recording orders, maintenance requirements, customer complaints and general queries
1.4	Automation	<ul style="list-style-type: none"> • Development specifications of product proposals • Technical specifications • Test plans / prescriptions / results • Project documentation
1.5	Card Operations	<ul style="list-style-type: none"> • Application forms • Alliance agreements • General supplier agreements
1.6	Training and Programs	<ul style="list-style-type: none"> • Course outlines and programmes • Register of delegates

No	Subject	Description of record
2	SUPPLY, TRADING AND OPTIMISATION	
2.1	Supply	<ul style="list-style-type: none"> • Buy/Sell contracts • Term and spot deals • Pipeline agreement • Import and export records • Trading contracts • Product exchange agreements • Product scheduling records
2.2	Trading	<ul style="list-style-type: none"> • Barge contracts • SFF storage contracts
2.3	Pricing and Business Support	<ul style="list-style-type: none"> • Pricing studies • Pricing records • Business analysis studies • Business performance records • Sales records • Consumption records • Inventories • Procurement contracts • Transfer Pricing Agreements • Accounting records
3	COMMERCIAL AND INDUSTRIAL	
	Sales Support	<ul style="list-style-type: none"> • Customer contracts • Sales and discount records • Product information and specifications • Material safety data sheets
4	CAPITAL PLANNING AND EXECUTION	
	Strategic Planning	<ul style="list-style-type: none"> • Corporate and strategic planning records • Special project data
5	COMPANY SECRETARIAL RECORDS	
	Company Records	<ul style="list-style-type: none"> • Company incorporation documents • Memorandum of Incorporation • Directors' names • Agendas and minutes of Board of Directors meetings • Board resolutions

No	Subject	Description of record
		<ul style="list-style-type: none"> Records relating to appointment of directors, auditor, secretary, public officer and/or other officers Share register and other statutory registers Shareholder policies and guidelines Other statutory records
6	MANUFACTURING	
6.1	Refinery Operations	<ul style="list-style-type: none"> Product storage and handling data Quality and protection procedures Plant service, reliability and maintenance records Product engineering and inspection records Operational procedures and manuals Manufacturing data
6.2	Reliability and Maintenance	<ul style="list-style-type: none"> Planning and scheduling records Equipment integrity records
6.3	Safety, Health Environment and Quality	<ul style="list-style-type: none"> Environmental, health, safety, quality assurance and risk data Health, environment and safety standards manuals Health, environment and safety reviews, assessments and audits Major hazardous installations assessment working documents Remediation records Health, environment and safety performance statistics Incident reports
6.4	Technical Services	<ul style="list-style-type: none"> Quality management and certification Production records Inventories Sales records Designs, process and product engineering records Certificates of quality Product specifications Sample service reports

No	Subject	Description of record
		<ul style="list-style-type: none"> Minutes of industry technical committee meetings General accounting and administration records
7	PROCUREMENT	
7.1	Third parties	<ul style="list-style-type: none"> Supplier contracts Surveying and inspections contracts Shipping contracts Supplier data Tender documents Quotations / proposal requests
7.2	Preferential Procurement	<ul style="list-style-type: none"> Records and reporting to Astron Energy, including in relation to B-BBEE and Employment Equity Plan
8	LEGAL	
8.1	General	<ul style="list-style-type: none"> Collections and claims Litigation General legal matters Contracts
8.2	Risk and compliance	<ul style="list-style-type: none"> Policies and procedures Risk assessments Compliance records, guidelines and standards Audit records
8.3	Knowledge	<ul style="list-style-type: none"> Various articles, presentations, analysis, interviews and press releases
9	HUMAN RESOURCES AND LABOUR RELATIONS	
9.1	Labour relations records	<ul style="list-style-type: none"> Personnel documents and records (including employment contracts, medical aid, pension fund, disciplinary, salary and leave records) Disciplinary code and / or procedures Training manuals and records Wellness Program records Employee contact information Human resources policies, procedures and guidelines <i>Curriculum vitae</i>
9.2	Income tax	<ul style="list-style-type: none"> Pay-as-you-earn (PAYE) records

No	Subject	Description of record
		<ul style="list-style-type: none"> • Documents issued to employees for income tax purposes • Records of payments made to South African Revenue Services on behalf of employees • All or any statutory compliance • Unemployment Insurance Fund
10	FINANCE	
	Finance	<ul style="list-style-type: none"> • Accounting records • Annual budget • Bank statements • Invoices • Asset register • VAT records
11	FACILITIES AND LOGISTICS	
11.1	Transport and Operations	<ul style="list-style-type: none"> • Stock registers/inventories • Quality control certificates and records • Inspection reports • Transport agreements • Depot site plans and records • Bulk storage tank tables • Lease/concession agreements • Joint venture agreements • Maintenance records • Vendor details • Security and Driver information
11.2	Lubricants Supply Chain	<ul style="list-style-type: none"> • Stock records • Planning and scheduling records • Shipping records • Maintenance records • Inspection records • Equipment manuals • Project data packs • Plant plot plans • Plant Isometrics • Electrical One-line diagrams • Tank As-built drawings
11.3	Facilities management	<ul style="list-style-type: none"> • Security records

No	Subject	Description of record
		<ul style="list-style-type: none"> • Building records • Facility conductor records

PART C – PERSONAL INFORMATION

13 INTRODUCTION

13.1 PAIA requires that this Manual describes the processing of Personal Information that we do.¹¹

13.2 We process Personal Information in compliance with POPIA and the eight conditions for lawful processing contained therein.

13.3 A fuller description of how we process Personal Information is contained in our -

13.3.1 Internal Privacy Notice, in relation to Employees; and

13.3.2 External Privacy Notice, in relation to external Data Subjects (which is available on our website at the following link: <https://www.astronenergy.co.za/about-us/policies-procedures/>).

13.4 This Manual should be read with the Internal Privacy Notice and External Privacy Notice, whichever is applicable.

14 THE PURPOSE OF THE PROCESSING THAT WE DO¹²

We process Personal Information in terms of the lawful bases listed in Annexure B of our Internal Privacy Notice and Annexure B of our External Privacy Notice. We process Personal Information for the following purposes:

¹¹ PAIA, section 51(1)(c).

¹² PAIA, section 51(1)(c)(i).

Purpose	Explanation
Operations	<p>Where you are our branded marketer, franchisee, customer (wholesale or retail), website user, or we market our goods or services to you, we may process your Personal Information for the purposes of -</p> <ul style="list-style-type: none"> • procuring and onboarding customers; • operating our website; • the processing and fulfilment of orders; • supplying our goods and services; • generating invoices, bills and other payment-related documentation; • receiving and monitoring payments; • credit control. <p>Where we are your customer, we may process your Personal Information for the purposes of -</p> <ul style="list-style-type: none"> • receiving goods and services; • making and monitoring payments; • credit control; • expense monitoring and analytics.
Relationships and communications	<p>We may process Personal Information for the purposes of -</p> <ul style="list-style-type: none"> • managing our relationships; • providing support services; • complaint handling; • receiving products or services; and • communicating with you (excluding communicating for the purposes of direct marketing) by email, WhatsApp, instant messenger, videoconferencing, SMS, post, and/or telephone.
Direct marketing	<p>We may process Personal Information for the purposes of creating, targeting and sending direct marketing communications by -</p> <ul style="list-style-type: none"> • email; • SMS; • post; and • telephone calls.
Research and analysis	<p>We may process usage data and/or transaction data for the purposes of researching and analysing (and improving where required) the use of our -</p> <ul style="list-style-type: none"> • website;

Purpose	Explanation
	<ul style="list-style-type: none"> • services; • sales; • expenses; • as well as researching and analysing other interactions with our business.
Record keeping	We may process your Personal Information for the purposes of creating and maintaining our data bases, back-up copies of our data bases and our business records generally.
Security and access to our premises	We may process your Personal Information for the purposes of security and the prevention of fraud, and other criminal activity.
Insurance and risk management	We may process your Personal Information where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice.
Legal claims	We may process your Personal Information where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure (including mediation, arbitration and any expert or referee determination process).
Legal compliance and vital interests	We may also process your Personal Information where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.
Hiring Employees	We process Personal Information for recruitment and hiring purposes.
Premises, IT, access and monitoring	If you visit any of our premises, we need to process your Personal Information to grant you access to our technical and IT infrastructure. We also need to process your Personal Information to provide you with access to our premises, including our head office, branches, plants, and refinery.
HR and employee	<p>We process the Personal Information of our Employees for a variety of HR related purposes, including -</p> <ul style="list-style-type: none"> • for general employment related purposes;

Purpose	Explanation
related purposes	<ul style="list-style-type: none"> • to pay fees, remuneration, and benefits; • providing our services / products and assessing employee work product; • premises, IT, access and monitoring; • leave management; • performance management; • training and development; • disciplinary, complaints, and misconduct; • termination.

15 CATEGORIES OF DATA SUBJECTS AND TYPES OF PERSONAL INFORMATION¹³

15.1 We process Personal Information relating to a variety of Data Subjects and types of Personal Information as follows:

Data Subject	Types of Personal Information processed
Employees	<ul style="list-style-type: none"> • Full names • Identity and / or passport number • Gender • Contact details: phone number(s), email address, physical address and postal address ("Contact Information") • Banking details, payments made, and other financial information • Employment contract • Curriculum vitae, references, and their contact details • Biographic information like marital status, birth date, nationality, next of kin, work permit • Employee benefits, including pension and medical aid and dependents • Tax number and other tax information • Special Personal Information including information relating to - <ul style="list-style-type: none"> (1) health or sex life; (2) trade union membership, (3) biometrics; (4) religious and / or philosophical beliefs; (5) race and / or ethnicity; (6) criminal behaviour, relating to the alleged commission of an offence or proceedings • Criminal record check

¹³ PAIA, section 51(1)(c)(ii).

Data Subject	Types of Personal Information processed
	<ul style="list-style-type: none"> • Leave records, including sick leave • Perform reports • IT related information, like passwords, search history, emails, logins, access points etc. • CCTV and other access and IT records • Promotion / demotion history • Disciplinary records and complaints including any CCMA records • Occupational health and safety and COIDA records
Service providers and suppliers	<ul style="list-style-type: none"> • Entity or person's full name and identifying number (registration or ID number) ("Identifying Information") • Contact Information • Representatives' names, their Contact Information and any recorded correspondence with them ("Representative Information") • Banking details, payments made, invoices, and receipts ("Financial and Payment Information") • Tax number, tax paid, value added ("VAT") charged, tax clearance, and any exchange control information ("Tax Information") • Products and services purchased, received and returned; delivery site/s; and all related records ("Product / Services Information") • B-BBEE certificate, score and related information ("B-BBEE Information") • Legal and compliance documents and records, like - <ul style="list-style-type: none"> (1) agreements including any service level agreement, non-disclosure agreement, data processing agreement, operator / processor agreement, financing agreement, terms and conditions; (2) compliance records including any documents relating to compliance with applicable laws, due diligence, assessments; regulator investigation and any similar records; (3) dispute and complaints records; (4) any criminal complaint and related documents; and (5) court, tribunal. arbitration and / or mediation documents and records ("Legal and Compliance Information") • Correspondence, including with Representatives, legal representatives, auditors, accountants and / or other professional advisors ("Correspondence Information")
Customers, branded	<ul style="list-style-type: none"> • Identifying Information • Contact Information • Location information, including sites and locations

Data Subject	Types of Personal Information processed
marketers, franchisees	<ul style="list-style-type: none"> • Representative Information • Financial and Payment Information • Tax Information • Product / Services Information • B-BBEE Information • Legal and Compliance Information which will also include any branded marketer agreement and / or franchise agreement • Correspondence Information • Information about retailers' customers, including transaction and card details, volume, and loyalty card details (name and number)
Requesters in terms of PAIA	<ul style="list-style-type: none"> • Identifying Information • Contact Information • Request form and its contents • Requested records • Correspondence • Response/s and any records disclosed • Any other information provided by requester
Data Subjects enacting their rights in terms of POPIA	<ul style="list-style-type: none"> • Identifying Information • Contact Information • Request form and its contents • Requested records • Correspondence • Any other information provided by Data Subject
Other complainants and enquirers	<ul style="list-style-type: none"> • Identifying Information • Contact Information • Complaint or enquiry and its contents • Correspondence • Response/s and any records disclosed • Any other Information supplied to us by a complainant or enquirer.
Website users	<ul style="list-style-type: none"> • IP address • Geographical location • Browser type and version • Operating system, referral source • Length of visit • Page views • Website navigation paths

Data Subject	Types of Personal Information processed
	<ul style="list-style-type: none"> • Information about the timing, frequency and pattern of your service use • Please see our cookies notice available at [insert link] for further information
Job employment applicants /	<ul style="list-style-type: none"> • Full names • Gender • Identity and / or passport number • Contact Information • CV, references and their contact details • Interview notes • Special Personal Information including information relating to - <ul style="list-style-type: none"> (1) health or sex life; (2) religious and / or philosophical beliefs; (3) race and / or ethnicity; (4) criminal behaviour, relating to the alleged commission of an offence or proceedings • Criminal record check • Correspondence with candidate and any job placement agency / recruiter
Premises visitors and IT users	<ul style="list-style-type: none"> • Physical and electronic access records • CCTV footage • Download and print records • records of internet and email usage in accordance with policies relating to internet and IT
Direct marketing recipients	<ul style="list-style-type: none"> • Identifying Information • Contact Information • Correspondence • Marketing preferences, including email, SMS, post and telephone and opt-ins • No contact lists and persons identified

16 DISCLOSURE OF PERSONAL INFORMATION¹⁴

16.1 Where we share your Personal Information, we will take all reasonable and practicable measures to ensure that the third party who we have shared your Personal Information with will treat it with the same level of confidentiality and security as is required by us and that the information will be used solely for the

¹⁴ PAIA, section 51(1)(c)(iii).

purpose for which it was disclosed for. Where necessary, we have agreements in place with third parties ensuring this. We cannot, however, guarantee the security of any information which we share with a third party.

- 16.2 We are part of the international Glencore group of companies (the "**Glencore Group**" and each a "**Group Company**"). As such, we may disclose your Personal Information to any Group Company, including, without limitation, in order to run global processes, carry out group wide reporting, or take decisions about hiring or promotion.
- 16.3 To perform or render our Services and support the Glencore Group, we share information within the Glencore Group. We may also share your Personal Information with our Employees, directors and service providers.
- 16.4 Where we wish to share your Personal Information for marketing purposes, we will ask for your consent before we do so.
- 16.5 We may be obliged to disclose your Personal Information where we have a duty or obligation to disclose it in terms of any applicable law or where it is necessary to protect our rights.

17 **TRANSFER OF PERSONAL INFORMATION OUTSIDE OF SOUTH AFRICA**¹⁵

As the Glencore Group is an international business, your Personal Information may be shared with companies within our company group who are situated outside of South Africa. Your Personal Information may be accessed via our intranet in another country in which we operate. However, we ensure that the recipient of your Personal Information is subject to a law or binding agreement with us which ensures an adequate level of protection to the Personal Information as POPIA does.

¹⁵ PAIA, section 51(1)(iv).

18 GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES¹⁶

- 18.1 We take reasonable and appropriate technical and organisational measures to ensure that Personal Information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, and unauthorised alteration, disclosure or access. We contractually require that service providers who handle your Personal Information for us do the same.
- 18.2 We have various group policies in place to ensure that your Personal Information is kept secure. Our policies are supported by the following security measures, amongst others, -
- 18.2.1 physical access controls in respect of physically stored Personal Information;
- 18.2.2 information technology access controls and defences, including data loss prevention technology, firewalls, anti-virus, and password protection. We use encryption where possible;
- 18.2.3 in respect of Employees, we store your Personal Information securely with access restriction to human resources personnel and where necessary, management; and
- 18.2.4 internal training and detailed documented policies on data protection matters, including guidance on legal requirements and industry-informed best practice.
- 18.3 We, on a regular basis, review the security controls and related processes to ensure that Personal Information is secure.

19 SECURITY COMPROMISE

- 19.1 Should Astron Energy experience a Security Compromise, we will ensure that all reasonable steps are taken to prevent any further loss of data and to secure the data as soon as possible. The Regulator will be informed of the data breach, as

¹⁶ PAIA, section 51(1)(v).

required by POPIA and all further notifications required by POPIA will be complied with.

- 19.2 The Security Compromise will be investigated, and the Information Officer will supervise the response to the breach. Once the Security Compromise has been contained and the investigation concluded, Astron Energy will compile a report on the cause of the Security Compromise and the actions to be taken to prevent a future data breach from occurring again which could include, amongst others, amending Astron Energy's policies and procedures.

20 EXERCISE OF A RIGHT IN TERMS OF POPIA

If you are our Data Subject, you have the rights afforded to you in POPIA. You may exercise the rights described below in the manner so described.

20.1 **Objection**¹⁷

Where you wish to object to the processing of their Personal Information, you must complete the prescribed form attached to this Manual as **Form 1** in Annexure A.

20.2 **Correction / Deletion**¹⁸

Where you wish to request that we delete or correct your Personal Information, you must complete the prescribed form attached to this Manual as **Form 2** in Annexure A.

20.3 **Access**¹⁹

- 20.3.1 You have the right to request that we confirm, free of charge, whether we hold Personal Information about you. You may request from us the record or a description of the Personal Information which we hold, including information

¹⁷ POPIA, section 11(3)(a).

¹⁸ POPIA, section 24.

¹⁹ POPIA, section 23.

about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.

20.3.2 Where you are required to pay a fee for access in terms of POPIA, we will provide you with a written estimate and may require that you pay a deposit.

20.3.3 A request for access to Personal Information may be subject to refusal in terms of PAIA (see 25).

PART D - ACCESS TO RECORDS

21 PAIA - HOW TO REQUEST ACCESS TO A RECORD

21.1 To request a record in terms of PAIA, you (a "**Requester**") must complete the prescribed form attached to this Manual as Annexure A (the "**Request**"). This Request must be sent to the Information Officer at the addresses provided at 8.2.

21.2 You must in the Request -

21.2.1 provide sufficient detail to enable the Information Officer to identify the record(s) requested and the Requestor;

21.2.2 indicate which form of access is required;

21.2.3 identify the right that they are seeking to exercise or protect;

21.2.4 provide an explanation of why the requested record is required for the exercise or protection of that right; and

21.2.5 if the Request is made on behalf of another person, the Requestor must submit proof of the capacity in which the Requestor is making the Request, to the reasonable satisfaction of the Information Officer.

21.3 PAIA makes provision for certain grounds upon which a request for access to information must be refused. On this basis, the Information Officer will make a decision whether or not to grant a Request (see 25).

22 PAYMENT OF FEES

- 22.1 PAIA provides for two types of fees for Requesters requesting a record -
- 22.1.1 a request fee, which will be a standard non-refundable administration fee, payable prior to the Request being considered (collectively, "**the Request Fee**"); and
- 22.1.2 an access fee, payable when access to the record is granted, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs (collectively, "**the Access Fee**").
- 22.2 Once a Request has been made by you, the Information Officer will give you notice to pay the Request Fee, which must be paid before your Request can be further processed.
- 22.3 If the preparation of a record being requested will require more than six hours, we will request you to pay one third of the Access Fee as a deposit.
- 22.4 We may withhold a record until you have paid the fees as indicated in Annexure C.

23 APPLICABLE TIME PERIODS

- 23.1 Astron Energy will by notice inform you within 30 days after receipt of a Request of its decision whether or not to grant the Request.
- 23.2 The 30-day period may be extended by a further period of not more than 30 days for one of the reasons indicated in PAIA, including where the Request is for a large number of records or requires a search through a large number of records.

24 OUTCOME OF THE REQUEST (GRANTING OR REFUSING)

- 24.1 If your Request has been granted, you must pay the Access Fee.
- 24.2 If your Request is refused, the notice referred to in 23.1 will state adequate reasons for the refusal, including the provisions of PAIA relied upon; and that you may lodge

a complaint to the Regulator or an application with a Court against the refusal of the request.

25 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

25.1 A Request may be refused on one or more of the following grounds –

25.1.1 protection of privacy to a third party who is a natural person;

25.1.2 protection of the commercial information of a third party;

25.1.3 protection of certain confidential information of a third party;

25.1.4 protection of the safety of individuals and the protection of property;

25.1.5 protection of records privileged from production and legal proceedings;

25.1.6 our commercial information; and/or

25.1.7 the protection of our or a third party's research information.

25.2 Despite any grounds for refusal of access to records provided for in PAIA, a Request must be granted if the disclosure of the record would reveal evidence of substantial contravention of or failure to comply with the law or imminent and serious public safety or environment risk, and the public interest in the disclosure of the record clearly outweighs the harm contemplated.²⁰

26 REMEDIES FOR REFUSAL

26.1 If a deposit has been paid in respect of a Request which is refused, the head of Astron Energy or his/her duly authorised representative shall repay the deposit to the Requester.

²⁰ PAIA, section 70.

- 26.2 Should the Requester be dissatisfied with the Information Officer's decision to refuse access, that person may within 30 days after notification of the refusal lodge a complaint with the Regulator or apply to a Court for the appropriate relief

ANNEXURE A – REQUEST FOR ACCESS

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

- 1. Proof of identity must be attached by the requester.*
- 2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

Request is made in my own name Request is made on behalf of another person. **PERSONAL**

INFORMATION

Full Names

Identity Number

Capacity in which request is made *(when made on behalf of another person)*

Postal Address

Street Address

E-mail Address

Contact Numbers

Tel. (B):

Facsimile:

Cellular:

Full names of person on whose behalf request is made *(if applicable)*:

Identity Number

Postal Address

ANNEXURE B – OBJECTION AND CORRECTION OR DELETION FORMS

FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017 [Regulation 2(1)]

Note:

- 1. Affidavits or other documentary evidence in support of the objection must be attached.*
- 2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number.....

A	DETAILS OF DATA SUBJECT
Name and surname of Data Subject:	
Residential, postal or business address:	
Contact number(s):	
FAX number:	
E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party (if the responsible party is a natural person):	
Residential, postal or business address:	
Contact number(s):	
FAX number:	
E-mail address:	
Name of public or private body (if the responsible party is not a natural person):	
Business address:	
Contact number(s):	
FAX number:	

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017 [Regulation 3(2)]

Note:

*Affidavits or other documentary evidence in support of the request must be attached.
If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign
each page.*

Reference Number.....

Mark the appropriate box with an "x".

Request for:

☐

Correction or deletion of the Personal Information about the Data Subject which is in possession or under the control of the responsible party.

☐

Destroying or deletion of a record of Personal Information about the Data Subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF DATA SUBJECT
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
Contact number(s):	
FAX number:	
E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party (if the responsible party is a natural person):	
Residential, postal or business address:	

ANNEXURE C – FEES

FEES PAYABLE IN RESPECT OF RECORDS REQUESTED FROM ASTRON ENERGY

Item	The fees, in respect of private bodies, are as follows for reproduction of and access to records –	Amount
1	The request fee payable by every requester	R140.00
2	For every photocopy of an A4-size page or part thereof	R 2.00
3	For every printed copy of an A4-size page or part thereof	R 2.00
4	For a copy in a computer-readable form on: <ul style="list-style-type: none"> flash drive (to be provided by requestor) compact disc <ul style="list-style-type: none"> if provided by the requestor If provided to the requestor 	R40.00 R40.00 R60.00
5	For a transcription of visual images, for an A4-size page or part thereof	Service to be outsourced. Will depend on quotation from service provider.
6	For a copy of visual images	
7	For a transcription of an audio record, for an A4-size page or part thereof	R 24.00
8	For a copy of an audio record on: <ul style="list-style-type: none"> flash drive (to be provided by requestor) compact disc <ul style="list-style-type: none"> if provided by the requestor If provided to the requestor 	R40.00 R40.00 R60.00
9	To search for and prepare the record for disclosure for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation.	R145.00
	To not exceed the total cost of	R435.00

For purposes of section 54(2) of the Act, the following applies –

six hours as the hours to be exceeded before a deposit is payable; and

if the search exceeds 6 hours, one third of the amount per request is payable as a deposit by the requester.

The actual postage, e-mail, or any other electronic transfer expense, if any, is payable if a copy of a record must be posted to a requester.