



**Stefanutti Stocks**  
PAIA Manual

**Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)**

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**Index**

1. LIST OF ACRONYMS AND ABBREVIATIONS .....	4
2. PURPOSE OF PAIA MANUAL .....	4
3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF STEFANUTTI STOCKS HOLDINGS LTD ...	5
4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE .....	6
5. REQUEST PROCESS FOR ACCESS TO RECORDS .....	8
6. GROUNDS FOR REFUSAL OF ACCESS .....	8
7. REMEDIES FOR REFUSAL OF ACCESS .....	8
8. INFORMATION REGULATOR CONTACT DETAILS FOR COMPLAINTS .....	9
9. CATEGORIES OF RECORDS OF STEFANUTTI STOCKS HOLDINGS LTD WHICH ARE AVAILABLE WITHOUT HAVING TO REQUEST ACCESS .....	9
10. DESCRIPTION OF THE RECORDS OF STEFANUTTI STOCKS HOLDINGS LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION .....	10
11. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY STEFANUTTI STOCKS HOLDINGS LTD .....	11
12. PROCESSING OF PERSONAL INFORMATION .....	12
13. RETENTION AND DELETION OF PERSONAL INFORMATION .....	15
14. STAKEHOLDER INFLUENCE ON COMPANY POLICIES.....	15
15. AVAILABILITY OF THE MANUAL .....	16
16. UPDATING OF THE MANUAL .....	16

## 1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 “CEO”	Chief Executive Officer
1.2 “DIO”	Deputy Information Officer
1.3 “IO“	Information Officer
1.4 “Minister”	Minister of Justice and Correctional Services
1.5 “PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as amended)
1.6 “POPIA”	Protection of Personal Information Act No.4 of 2013
1.7 “Regulator”	Information Regulator
1.8 “Republic”	Republic of South Africa

## 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is designed to:

- 2.1 check the categories of records held by Stefanutti Stocks Holdings (Ltd), its subsidiaries, joint ventures, and associated entities, whether incorporated or operating in South Africa or internationally (“the Group”) which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the Group, by providing a description of the subjects on which the Group holds records, and the categories of records held on each subject;
- 2.3 know the description of the records of the Group which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the IO and DIO who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 detail the types of personal information processed, including retention and deletion policies.
- 2.7 know if the Group 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;
- 2.8 ensure compliance with PAIA and POPIA regulations.
- 2.9 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.10 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.11 know if the Group 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
- 2.12 know whether the Group has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### 3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF STEFANUTTI STOCKS HOLDINGS LTD

#### 3.1 Information Officer (IO)

**Name:** Russell Crawford  
**Role and Responsibilities:** The IO oversees compliance with PAIA and POPIA, manages requests for access to records, ensures proper handling of personal information, and liaises with the Information Regulator.  
**Tel:** 011 552 4215  
**Postal address:** Private Bag X2032, Isando, 1600  
**Physical address:** Protec Park, cnr Zuurfontein Avenue & Oranjerivier Drive, Chloorkop  
**Email:** russell.crawford@stefstocks.com



**INFORMATION OFFICER**

#### 3.2 Deputy Information Officer

**Name:** Richard Harrison  
**Role and Responsibilities:** Assists the IO in processing PAIA requests, provides support to requesters, and ensures records are accessible in compliance with legislation.  
**Tel:** +27 11 552 4299  
**Email:** richard.harrison@stefstocks.com

**Name:** Henrico Jacobs  
**Role and Responsibilities:** Supports the IO in managing record requests, facilitates internal coordination for information retrieval, and ensures compliance with PAIA and POPIA.  
**Tel:** +27 11 552 4039  
**Email:** henrico.jacobs@stefstocks.com

#### 3.3 Access to information general contacts

**Email:** holdings@stefstocks.com  
**Direct PAIA Request Line:** +27 11 571 4355 (*dedicated phone line for PAIA inquiries*)

#### 3.4 National or Head Office

**Postal Address:** Private Bag X2032, Isando, 1600  
**Physical Address:** 9 Palala Street, Protec Park, cnr Zuurfontein Avenue & Oranjerivier Drive, Chloorkop  
**Telephone:** +27 11 571 4300 / +27 87 809 2000  
**Email:** holdings@stefstocks.com  
**Website:** <https://stefanuttistocks.com>

#### 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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.

The Guide is available in English.

The aforesaid Guide contains the description of: -

- 4.1 the objects of PAIA and POPIA;
- 4.2 the postal and street address, phone and, if available, electronic mail address of-
  - 4.2.1 the IO of every public body, and
  - 4.2.2 every DIO of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 4.3 the manner and form of a request for-
  - 4.3.1 access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 4.3.2 access to a record of a private body contemplated in section 50<sup>4</sup>;
- 4.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.6 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: -
  - 4.6.1 an internal appeal;
  - 4.6.2 a complaint to the Regulator; and
  - 4.6.3 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;

1. Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

2. Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

3. Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

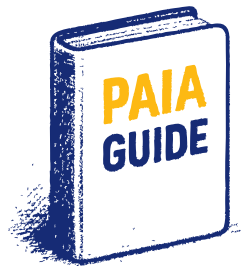
4. Section 50(1) of PAIA- *A requester must be given access to any record of a private body if- that record is required for the exercise or protection of any rights; that person complies with the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.7 the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> 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<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.8 the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.9 the regulations made in terms of section 92<sup>11</sup>.

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

The Guide can also be obtained-

- upon request to the IO;
- from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).



5. Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

6. Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

7. Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

8. Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

9. Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

10. Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

11. Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

## 5. REQUEST PROCESS FOR ACCESS TO RECORDS

To request access to a record held by Stefanutti Stocks Holdings Ltd, follow these steps:

- **Complete the Request Form:** Obtain Form C (available on the company website or from the IO) and fill in all required details, including the requester's identity, the record requested, and the preferred format (electronic or hard copy)
- **Submit the Request:** Send the completed form to the IO via:
  - Email: russell.crawford@stefstocks.com
  - Direct PAIA Request Line: +27 11 571 4350 (for verbal submission or queries)
  - Postal Address: Private Bag X2032, Isando, 1600
- **Pay the Request Fee:** A prescribed fee (as per PAIA regulations) may apply, payable upon submission. Fee details are available from the IO.
- **Await Response:** The company will acknowledge receipt and respond within 30 days, either granting access, denying the request (with reasons), or requesting an extension if necessary.
- **Receive Records:** If approved, records will be provided in the requested format (electronic or hard copy), subject to any applicable access fees.

## 6. GROUNDS FOR REFUSAL OF ACCESS

Stefanutti Stocks Holdings Ltd may refuse access to records in accordance with PAIA, including:

- **Protection of Privacy:** If disclosure would unreasonably infringe on an individual's personal privacy (section 63).
- **Commercial Confidentiality:** If the record contains trade secrets, financial, or commercial information that could harm the company or a third party (section 64).
- **Legal Privilege:** If the record is protected by legal professional privilege (section 67).
- **Safety and Security:** If disclosure could endanger the safety of an individual or property (section 66).
- **Mandatory Protection:** If required by law to protect third-party information (section 65).
- **Frivolous or Vexatious Requests:** If the request is manifestly unreasonable or burdensome (section 62).

Reasons for refusal will be provided in writing to the requester.

## 7. REMEDIES FOR REFUSAL OF ACCESS

If a PAIA request is denied, the requester may appeal the decision as follows:

- **Internal Appeal:**
  - Submit a written appeal to the IO within 60 days of the refusal notice, using Form B (available on the company website or from the IO).
  - Clearly state the grounds for the appeal and provide supporting documentation.
  - The CEO or a designated appeal officer will review the decision and respond within 30 days.
- **External Review:** If the internal appeal is unsuccessful, the requester may lodge a complaint with the Information Regulator (see Section 8) or apply to a court for relief within 180 days of the appeal decision.



## 8. INFORMATION REGULATOR CONTACT DETAILS FOR COMPLAINTS

For complaints regarding PAIA request denials or non-compliance, contact:

- **Information Regulator (South Africa)**
- **Postal Address:** P.O. Box 31533, Braamfontein, Johannesburg, 2017
- **Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Telephone:** +27 10 023 5200
- **Email:** inforeg@justice.gov.za
- **Website:** <https://www.justice.gov.za/inforeg/>

## 9. CATEGORIES OF RECORDS OF STEFANUTTI STOCKS HOLDINGS LTD WHICH ARE AVAILABLE WITHOUT HAVING TO REQUEST ACCESS

Category of records	Types of the Record	How to Access
Company Information	<ul style="list-style-type: none"> <li>• Company profile</li> <li>• Company registration documents</li> <li>• B-BBEE certificates</li> <li>• Contact details</li> <li>• Office locations</li> </ul>	Available on company website or upon email/ telephone request
Project Portfolio	<ul style="list-style-type: none"> <li>• Completed projects gallery</li> <li>• Project descriptions</li> <li>• Project timelines</li> <li>• Client testimonials</li> </ul>	Available on company website
Services	<ul style="list-style-type: none"> <li>• Construction services offered</li> <li>• Specialisations</li> <li>• Service brochures</li> </ul>	Available on company website or upon email request
News and Media	<ul style="list-style-type: none"> <li>• Press releases</li> <li>• Media coverage</li> <li>• Company newsletters</li> <li>• Industry updates</li> </ul>	Available on company website
Careers	<ul style="list-style-type: none"> <li>• Current job vacancies</li> <li>• Application procedures</li> <li>• General employment information</li> </ul>	Available on company website
Health and Safety	<ul style="list-style-type: none"> <li>• Health and safety policy</li> <li>• Safety records</li> <li>• Environmental policy</li> </ul>	Available upon email request
Tenders	<ul style="list-style-type: none"> <li>• Open tenders</li> <li>• Tender requirements</li> <li>• Submission guidelines</li> </ul>	Available on company website or upon email request
Marketing Material	<ul style="list-style-type: none"> <li>• Brochures</li> <li>• Promotional videos</li> <li>• Company presentations</li> </ul>	Available on company website or upon email/ telephone request

## 10. DESCRIPTION OF THE RECORDS OF STEFANUTTI STOCKS HOLDINGS LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Company Registration Documents	<ul style="list-style-type: none"> <li>• Companies Act 71 of 2008</li> <li>• Companies Amendment Act 3 of 2011</li> </ul>
Employment Records	<ul style="list-style-type: none"> <li>• Basic Conditions of Employment Act 75 of 1997</li> <li>• Labour Relations Act 66 of 1995</li> <li>• Employment Equity Act 55 of 1998</li> <li>• Skills Development Act 97 of 1998</li> <li>• Unemployment Insurance Act 63 of 2001</li> <li>• Compensation for Occupational Injuries and Diseases Act 130 of 1993</li> </ul>
Tax Records	<ul style="list-style-type: none"> <li>• Income Tax Act 58 of 1962</li> <li>• Value Added Tax Act 89 of 1991</li> <li>• Tax Administration Act 28 of 2011</li> </ul>
Health and Safety Records	<ul style="list-style-type: none"> <li>• Occupational Health and Safety Act 85 of 1993</li> <li>• Construction Regulations 2014</li> </ul>
Environmental Records	<ul style="list-style-type: none"> <li>• National Environmental Management Act 107 of 1998</li> <li>• Environmental Conservation Act 73 of 1989</li> </ul>
B-BBEE Records	<ul style="list-style-type: none"> <li>• Broad-Based Black Economic Empowerment Act 53 of 2003</li> <li>• B-BBEE Codes of Good Practice</li> </ul>
Building and Construction Records	<ul style="list-style-type: none"> <li>• National Building Regulations and Building Standards Act 103 of 1977</li> <li>• Construction Industry Development Board Act 38 of 2000</li> </ul>
Property Records	<ul style="list-style-type: none"> <li>• Deeds Registries Act 47 of 1937</li> <li>• Expropriation Act 63 of 1975</li> </ul>
Financial Records	<ul style="list-style-type: none"> <li>• Financial Intelligence Centre Act 38 of 2001</li> <li>• Financial Advisory and Intermediary Services Act 37 of 2002</li> </ul>
Procurement Records	<ul style="list-style-type: none"> <li>• Preferential Procurement Policy Framework Act 5 of 2000</li> <li>• Prevention and Combating of Corrupt Activities Act 12 of 2004</li> </ul>



**11. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY STEFANUTTI STOCKS HOLDINGS LTD**

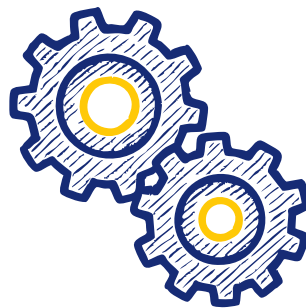
Subjects on which the body holds records	Categories of Records	
Administration	<ul style="list-style-type: none"> <li>• Licenses and permits</li> <li>• Insurance policies</li> <li>• General correspondence</li> <li>• Service agreements</li> </ul>	<ul style="list-style-type: none"> <li>• Memoranda</li> <li>• Minutes of meetings</li> <li>• Office management records</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>• Employee personal files</li> <li>• Employment contracts</li> <li>• Remuneration records</li> <li>• Disciplinary records</li> <li>• Leave records</li> <li>• Training records</li> </ul>	<ul style="list-style-type: none"> <li>• Performance evaluations</li> <li>• Recruitment records</li> <li>• Employment equity plans</li> <li>• Skills development plans</li> <li>• Health and safety training records</li> </ul>
Finance	<ul style="list-style-type: none"> <li>• Financial statements</li> <li>• Annual financial reports</li> <li>• Accounting records</li> <li>• Banking records</li> <li>• Asset register</li> <li>• Invoices</li> </ul>	<ul style="list-style-type: none"> <li>• Payment records</li> <li>• Tax returns</li> <li>• Auditor’s reports</li> <li>• Budgets</li> <li>• Management accounts</li> </ul>
Operations	<ul style="list-style-type: none"> <li>• Operational plans</li> <li>• Construction schedules</li> <li>• Site inspection reports</li> <li>• Quality control documents</li> </ul>	<ul style="list-style-type: none"> <li>• Production reports</li> <li>• Work procedures</li> <li>• Equipment maintenance records</li> </ul>
Projects	<ul style="list-style-type: none"> <li>• Project plans</li> <li>• Architectural drawings</li> <li>• Engineering designs</li> <li>• Bills of quantities</li> <li>• Construction contracts</li> </ul>	<ul style="list-style-type: none"> <li>• Variation orders</li> <li>• Project progress reports</li> <li>• Completion certificates</li> <li>• Client correspondence</li> <li>• Project photographs</li> </ul>
Legal	<ul style="list-style-type: none"> <li>• Contracts with clients</li> <li>• Contracts with suppliers</li> <li>• Contracts with subcontractors</li> <li>• Joint venture agreements</li> </ul>	<ul style="list-style-type: none"> <li>• Non-disclosure agreements</li> <li>• Litigation records</li> <li>• Legal opinions</li> <li>• Compliance records</li> </ul>
Supply Chain Management	<ul style="list-style-type: none"> <li>• Supplier database</li> <li>• Procurement policies</li> <li>• Purchase orders</li> <li>• Delivery notes</li> </ul>	<ul style="list-style-type: none"> <li>• Supplier performance evaluations</li> <li>• Tender documents</li> <li>• B-BBEE certificates of suppliers</li> <li>• Contractor agreements</li> </ul>
Health, Safety, and Environment	<ul style="list-style-type: none"> <li>• Health and safety policies</li> <li>• Risk assessments</li> <li>• Accident reports</li> <li>• Safety audit reports</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental impact assessments</li> <li>• Waste management records</li> <li>• Safety committee meeting minutes</li> <li>• Medical surveillance records</li> </ul>
Assets and Equipment	<ul style="list-style-type: none"> <li>• Fleet management records</li> <li>• Equipment register</li> <li>• Plant maintenance records</li> <li>• Asset purchase records</li> </ul>	<ul style="list-style-type: none"> <li>• Warranties</li> <li>• Equipment specifications</li> <li>• Lease agreements</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>• Information Technology policies and procedures</li> <li>• System documentation</li> <li>• User manuals</li> <li>• Software licenses</li> </ul>	<ul style="list-style-type: none"> <li>• Information Technology equipment register</li> <li>• Data backup records</li> <li>• Network configurations</li> </ul>

## 12. PROCESSING OF PERSONAL INFORMATION

### Purpose of Processing Personal Information

The primary purposes for processing personal information in the Group include:

- Operational and Administrative Purposes:
  - Managing employee, customer, and supplier records.
  - Processing payroll, benefits, and Human Resources administration.
  - Facilitating recruitment, onboarding, and training.
  - Maintaining accurate financial, legal, and business records.
- Service Delivery and Business Operations:
  - Providing products and services to clients and fulfilling contractual obligations.
  - Processing orders, invoices, and payments.
  - Managing customer relationships and communications.
  - Conducting market research and improving service offerings.
- Legal and Regulatory Compliance:
  - Complying with the Companies Act, Labour Laws, Tax Regulations, and other statutory requirements.
  - Conducting Know Your Customer (KYC), Financial Intelligence Centre Act (FICA), and anti-fraud checks.
  - Maintaining records for auditing and reporting purposes.
- Risk Management and Security:
  - Monitoring and protecting company assets, systems, and personnel.
  - Conducting background checks and verifying qualifications.
  - Managing cybersecurity, access controls, and surveillance where applicable.
- Communication and Marketing:
  - Sending newsletters, promotions, and service updates (with consent).
  - Managing social media, websites, and online platforms.



12.1 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
<b>Employees (Current and Former)</b>	<ul style="list-style-type: none"> <li>• <b>Personal Information:</b> Full name, ID/passport number, contact details, physical address, employment history, bank details, tax numbers, medical aid details.</li> <li>• <b>Special Personal Information:</b> Health information, trade union membership (if applicable), criminal record (where legally required), biometric data for access control.</li> <li>• <b>Purpose:</b> Employment administration, payroll, performance management, and compliance with labour laws.</li> </ul>
<b>Job Applicants and Contractors</b>	<ul style="list-style-type: none"> <li>• <b>Personal Information:</b> CVs, qualifications, references, contact details, ID/passport number.</li> <li>• <b>Purpose:</b> Recruitment, contracting, and verification of qualifications.</li> </ul>
<b>Customers/Clients</b>	<ul style="list-style-type: none"> <li>• <b>Personal Information:</b> Names, contact details, physical addresses, email addresses, banking details, company registration numbers (for corporate clients).</li> <li>• <b>Special Personal Information:</b> Credit history (where applicable).</li> <li>• <b>Purpose:</b> Customer relationship management, service delivery, invoicing, and account management.</li> </ul>
<b>Suppliers and Service Providers</b>	<ul style="list-style-type: none"> <li>• <b>Personal Information:</b> Company registration details, names and contact details of key representatives, banking details, Value Added Tax numbers.</li> <li>• <b>Purpose:</b> Procurement, payment processing, and contract management.</li> </ul>
<b>Shareholders and Investors</b>	<ul style="list-style-type: none"> <li>• <b>Personal Information:</b> Names, ID numbers, addresses, contact details, shareholding details.</li> <li>• <b>Purpose:</b> Managing shareholder relations, dividends, and regulatory reporting.</li> </ul>
<b>Website Users and Marketing Contacts</b>	<ul style="list-style-type: none"> <li>• <b>Personal Information:</b> Names, email addresses, IP addresses, device information, cookies, and browsing behaviour.</li> <li>• <b>Purpose:</b> Customer engagement, marketing communications, and website analytics.</li> </ul>
<b>Visitors to Premises</b>	<ul style="list-style-type: none"> <li>• <b>Personal Information:</b> Names, ID numbers, contact details, vehicle registration.</li> <li>• <b>Special Personal Information:</b> Surveillance footage (CCTV).</li> <li>• <b>Purpose:</b> Access control and site security.</li> </ul>
<b>Regulatory Authorities and Government Bodies</b>	<ul style="list-style-type: none"> <li>• <b>Personal Information:</b> Information required for tax, labour, and company compliance reporting.</li> <li>• <b>Purpose:</b> Fulfilling legal and regulatory obligations.</li> </ul>



12.2 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
<ul style="list-style-type: none"> <li>• <b>Employees and Management:</b> Access to personal information is limited to employees who require the data for their job functions, such as human resources, payroll, and finance teams.</li> <li>• <b>Executive Leadership:</b> For decision-making, compliance, and strategic management purposes.</li> </ul>	<b>Internal Recipients</b>
<ul style="list-style-type: none"> <li>• <b>Information Technology and Cloud Service Providers:</b> For secure storage, system maintenance, and data backup.</li> <li>• <b>Payroll and Benefits Administrators:</b> To process salaries, benefits, and tax obligations.</li> <li>• <b>Training and Development Providers:</b> For employee skills development and certification.</li> <li>• <b>Marketing and Communication Partners:</b> For customer engagement and marketing campaigns, with opt-in consent.</li> </ul>	<b>Service Providers and Business Partners</b>
<ul style="list-style-type: none"> <li>• <b>South African Revenue Service:</b> For tax compliance and reporting.</li> <li>• <b>Department of Labour:</b> For employment equity and UIF reporting.</li> <li>• <b>Regulatory Bodies:</b> Such as the Companies and Intellectual Property Commission (CIPC) and the Financial Sector Conduct Authority (FSCA).</li> <li>• <b>Law Enforcement Agencies:</b> If required for criminal investigations or fraud prevention.</li> </ul>	<b>Government and Regulatory Authorities</b>
<ul style="list-style-type: none"> <li>• <b>Banks:</b> For salary payments, supplier payments, and transaction processing.</li> <li>• <b>Credit Bureaus:</b> When conducting credit checks for suppliers or customers (where applicable).</li> </ul>	<b>Financial Institutions</b>
<ul style="list-style-type: none"> <li>• <b>Auditors and Accountants:</b> For financial audits, reporting, and tax filings.</li> <li>• <b>Legal Advisors:</b> When legal advice or defense is required.</li> <li>• <b>Insurance Providers:</b> For employee benefits, claims, and risk management.</li> </ul>	<b>Professional Advisors</b>
<ul style="list-style-type: none"> <li>• <b>Cross-Border Data Transfers:</b> Personal information may be shared with entities outside South Africa, such as international service providers, subject to POPIA requirements for adequate data protection.</li> </ul>	<b>International Recipients</b>
<ul style="list-style-type: none"> <li>• <b>Upon Request:</b> Data subjects have the right to access their own personal information as per PAIA and POPIA.</li> </ul>	<b>Data Subjects Themselves</b>

12.3 Physical Security Measures

- **Access Control:** Restricted access to buildings, offices, and server rooms using key cards, biometric systems, or security codes.
- **Surveillance:** CCTV monitoring at key access points and secure areas.
- **Document Control:** Secure storage of physical documents in locked cabinets, with shredding of sensitive information when no longer needed.
- **Visitor Management:** Controlled entry for visitors, requiring sign-in and escorting within secure areas.



## 12.4 Technical Security Measures

- **Network Security:** Firewalls, intrusion detection systems, and regular vulnerability assessments.
- **Data Encryption:** Encryption of data at rest and in transit to prevent unauthorised access.
- **Access Controls:** Role-based access to systems and files, with multi-factor authentication (MFA).
- **Endpoint Protection:** Antivirus software, endpoint detection and response (EDR), and automatic software updates.
- **Backup and Recovery:** Regular backups of critical data, stored both onsite and offsite, with disaster recovery plans in place.
- **System Monitoring:** Continuous monitoring of systems for suspicious activity, with automated alerts for potential breaches.

## 12.5 Organisational and Administrative Measures

- **Information Security Policies:** Documented policies covering data protection, acceptable use, and breach management.
- **Data Classification:** Categorisation of personal information based on sensitivity and required protection levels.
- **Training and Awareness:** Regular employee training on data privacy, cybersecurity, and phishing awareness.
- **Third-Party Risk Management:** Vetting of service providers and requiring data processing agreements (DPAs).
- **Record-Keeping:** Maintaining logs of access to sensitive information and regular audits to ensure compliance.

## 12.6 Data Subject Rights and Incident Management

- **Access and Correction:** Data subjects can request access to their information and have inaccuracies corrected.
- **Breach Notification:** If a data breach occurs, affected parties and the Information Regulator will be notified as per POPIA requirements.
- **Incident Response Plan:** A formal plan for detecting, containing, investigating, and mitigating data breaches.

## 12.7 Compliance and Continuous Improvement

- **Regular Audits:** Periodic internal and external audits to assess information security controls.
- **Policy Reviews:** Annual review of security policies and procedures to align with emerging threats and best practices.
- **Compliance Monitoring:** Ongoing monitoring to ensure adherence to POPIA, PAIA, and other applicable regulations.

## 13. RETENTION AND DELETION OF PERSONAL INFORMATION

Retention and deletion of personal information will be aligned with the provisions of law and/or best practice.

## 14. STAKEHOLDER INFLUENCE ON COMPANY POLICIES

Stakeholders, including employees, clients, suppliers, and shareholders, can influence company policies by:

- **Feedback Channels:** Submitting suggestions or complaints via [holdings@stefstocks.com](mailto:holdings@stefstocks.com) or +27 11 571 4300.
- **Consultation Processes:** Participating in surveys, forums, or stakeholder meetings announced on the company website.
- **Formal Requests:** Proposing changes through the IO, who will escalate them to management for review.
- **Annual Reviews:** Contributing input during policy update cycles, with outcomes communicated via newsletters or the website.



## 15. AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- on <https://stefanuttistocks.com>;
- head office of Stefanutti Stocks Holdings Ltd for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

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

## 16. UPDATING OF THE MANUAL

The manual is reviewed annually to ensure compliance with PAIA and POPIA.

***Issued by***

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Russell Crawford  
Chief Executive Officer