

JCDECAUX SOUTH AFRICA PROPRIETARY LIMITED
REGISTRATION NUMBER: 2008/015266/07

PAIA MANUAL

*prepared in accordance with section 51 of
the Promotion of Access to Information Act 2 of 2000 (as amended)*

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1. Background

The Promotion of Access to Information Act, No 2 of 2000 as amended by the Protection of Personal Information Act 4 of 2013 (the “**POPI Act**”) (the “**Act**” or “**PAIA**”) was enacted on 3 February 2000. The Act gives effect to the constitutional right of access to any information held by public and private bodies that is required for the exercise or protection of any rights. The Regulations relating to the Promotion of Access to Information, 2021 came into operation on 29 July 2021 (the “**Regulations**”).

In terms of section 51 of the Act, private bodies are required to compile a manual which contains the information necessary to enable individuals that are entitled to information to gain access to the relevant record.

This PAIA manual sets out the procedure that a requester (or “**you**”) must follow when requesting information from JCDecaux South Africa Proprietary Limited (“**we**”, “**us**”, “**our**” or “**JCDecaux SA**”) for the purpose of exercising or protecting your, or a third party’s, rights.

2. Introduction to JCDecaux South Africa Proprietary Limited

JCDecaux SA is an Out of Home Advertising Company.

3. Company information and contact details

Head of JCDecaux SA / Information Officer	Lunga Majija Managing Director South Africa
Deputy Information Officer	Rishaan Ramkissoon
Email address for PAIA requests	za_information.officer@jcdecaux.com
Postal address	Private Bag X91, Bryanston, 2021
Physical address	Block B, Nicol Main office park 2 Bruton Road, Bryanston 2191
Telephone number	+27 (11) 514 1400
Website	https://www.jcdecauxafrica.com/

4. Other information as may be prescribed

No notice has been submitted by the Minister of Justice and Constitutional Development regarding the categories of records which are available without a person having to request access in terms of the Act. However, the information that is published on our website is automatically available without you having to request access in terms of PAIA.

5. Insofar as PAIA is concerned:

The Act and the Section 10 Guide

The Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any right(s). If a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.

Requesters are referred to the Guide in terms of section 10 of the Act (the “**Guide**”). The Guide will be available from the Information Regulator or can be requested from

JCDecaux SA at the details provided above. The Guide shall also be available in at least 2 (two) official languages for physical review at the offices of JCDecaux SA during normal business hours. Upon your written request to the Information Officer (see details above) on the prescribed form (Form 1: Request for a Copy of the Guide from an Information Officer (in terms of regulation 3), which is available on the Information Regulators website below), we will make available the number of copies of the Guide in the official languages, as requested.

The contact details of the Information Regulator are:

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Email Address: inforeg@justice.gov.za

Website: www.justice.gov.za/inforeg

The latest notice in terms of section 52(2) of the Act

At this stage, no notice(s) has/have been published on the categories of records that are automatically available without a person having to request access in terms of section 52(2) of PAIA and regulation 5 of the Regulations.

Schedule of records available only upon request to access

Information is available in terms of the following legislation, where applicable:

- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Patents Act 57 of 1978
- Preferential Procurement Policy Framework Act 5 of 2000
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- The Prevention and Combatting of Corrupt Activities Act 12 of 2004
- The Protection of Constitutional Democracy Against Terrorist and Related Activities 33 of 2004
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act 30 of 1966
- Value-Added Tax Act 89 of 1991

Specific records that we hold include:

Category	Subjects
Corporate Governance	<ul style="list-style-type: none"> • Constitutional Documents • Register of directors • Minutes of meetings of the board of directors
Financial	<ul style="list-style-type: none"> • Audit reports and related information • Budgets • Insurance policies • Utility statements • Financial statements • Tax returns • Invoices
Contracts	<ul style="list-style-type: none"> • Appointment letter with auditors • Contracts with service providers • Procurement agreements and compliance documents • Service provider records
Compliance	<ul style="list-style-type: none"> • BBBEE Compliance • Internal auditing and risk • Legislative compliance • Regulatory reports • Policies and procedures

Are you entitled to access information?

You are not automatically allowed access to records and we may grant or refuse a request for access to information in accordance with the Act and Regulations.

Your request for information will be evaluated and you will be notified within 30 (thirty) days of receipt of your request of our decision. In deciding whether you are entitled to access the record, we will consider whether:

- a) you require the information in order to exercise or protect a right;
- b) you have complied with the procedural requirements of the Act; and
- c) the record you have requested contains any information that falls within the grounds for refusal of access to information in terms of PAIA.

We will inform you if your request is granted or refused and whether any fees are payable as provided for in Annexure B of the Regulations, on a form that corresponds substantially

with Form 3 of Annexure A of the Regulations. Should your request be refused, you will be given adequate reasons for the refusal, and you may lodge a complaint to the Information Regulator of South Africa ("**Information Regulator**") on a form that corresponds substantially with Form 5 of Annexure A of the Regulations or an application to court against our refusal of the request. The details of the procedure (including the period) for lodging any complaint to the Information Regulator are contained in the Act and the Regulations.

Notification of extension period (if required)

In terms of the Act, the 30 (thirty) day period mentioned above may be extended for a further period of not more than 30 (thirty) days under certain circumstances. Should we need to extend this period, we will provide you with notification of such extension.

Form of request for access to records

Any request for access to a record must be made on the prescribed form (Form 2: Request for Access to Record) which is available on the website of the Information Regulator of South Africa at www.justice.gov.za/inforeg in accordance with regulation 7 (1) and (2) of the Regulations. Your request may be emailed or delivered to our physical or postal address and must be addressed to the Information Officer (see details above). The Information Officer will assist you with your request for access to information. Where you make a request orally, as a result of illiteracy or a disability, the Information Officer will complete the abovementioned form on your behalf.

In order for us to identify the record that you request access to, please ensure that you provide us with the following information:

- a) the record requested;
- b) your identification details;
- c) the form of access required;
- d) your postal address, email address and telephone number;
- e) the right which you are seeking to exercise or protect with an explanation of why the requested record is required for the exercise or protection of that right;
- f) whether, in addition to a written reply, you wish to be informed of our decision on the request in any other manner, and if so, the relevant manner and the necessary particulars in order to be so informed; and
- g) whether the request is made on behalf of another person along with proof of the capacity in which you are making the request to the reasonable satisfaction of the Information Officer.

The request fee; access fee and/or deposit

The following applies to requests:

- you may be required to pay a prescribed request fee before your request will be processed;

- you will be informed if any fees are payable, including but not limited to fees for accessing, searching, preparation, reproduction, postage etc. of the record(s) for disclosure, in order for you to access the record/s (as provided for in Annexure B to the Regulations);
- you must pay the requested fees (if any) prior to the information being provided to you;
- a deposit in respect of the access fee may be requested in accordance with the Act and Regulations. This deposit is fully refundable should your request for access be refused;
- records may be withheld until the relevant fees have been paid;
- you may lodge a complaint to the Information Regulator or an application with a court against the tender/payment of the request fee and/or deposit, where applicable; and
- the details of the procedure (including the period) for lodging any complaint to the Information Regulator are contained in the Act and the Regulations.

Third party information

If access is requested to a record that contains information about a third party, you must provide specific written consent of the third party or prove that you require the information in order to exercise or protect a right. We are obliged to attempt to contact the third party to inform them of your request. This provides the third party with the opportunity to respond by either consenting to the access or by providing reasons why access should be denied. In the event of the third party furnishing reasons for the denial of access, we will consider these reasons in determining whether access should be granted or not, and advise you accordingly.

6. Insofar as the POPI Act is concerned:

The purpose of the processing

We collect and process personal information for the following purposes –

- providing our services or products or for obtaining services or products (such as responding to queries or requests submitted to us by authorised requesters or for the purposes of negotiating or fulfilling our contractual obligations);
- business purposes (such as the use of suppliers, internal audit, accounting, business planning, joint ventures, disposals of business, or other proposed and actual transactions); and
- legal purposes (such as complying with regulations or pursuing good governance).

Categories of data subjects and related personal information

Employees, Contractors and Consultants	Suppliers and Service Providers	Clients (i.e. Advertisers and Agencies)	Landlords (Private and Public)	Other (e.g. Statutory and other authorities)

<i>Personal Information</i>	<i>Personal Information</i>	<i>Personal Information</i>	<i>Personal Information</i>	<i>Personal Information</i>
Full name / juristic entity name	Full name / juristic entity name	Full name / juristic entity name	Full name / juristic entity name	Full name / juristic entity name
Identity number / passport number / registration number	Identity number / registration number	Identity number / registration number	Identity number / registration number	Contact details of employees or personnel
Contact details	Contact details	Contact details	Contact details	Contact details
Email address	Email address	Email address	Email address	Email address
Physical and postal address	Physical and postal address	Physical and postal address	Physical and postal address	Physical and postal address
Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence	Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence	Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence	Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence	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	that would reveal the contents of the original correspondence	that would reveal the contents of the original correspondence	that would reveal the contents of the original correspondence	that would reveal the contents of the original correspondence
Views or opinions by any person in respect of a data subject	Views or opinions by any person in respect of a data subject	Views or opinions by any person in respect of a data subject	Views or opinions by any person in respect of a data subject	Views or opinions by any person in respect of a data subject
Nationality	Nationality / jurisdiction of incorporation	Nationality / jurisdiction of incorporation	Nationality / jurisdiction of incorporation	
Pregnancy				
Marital status				
Disability				
Well-being				
Birth				

Employment history				
Criminal history				
Financial status / credit history				
Educational background				
Age				
Gender				
Next of kin details				
Language				
Employment related information (such as salary, benefits, etc)				
Banking information	Banking information	Banking information	Banking information	
	FICA information	FICA information	FICA information	
Juristic entity registration information	Juristic entity registration information	Juristic entity registration information	Juristic entity registration information	
Contact details of employees or personnel	Contact details of employees or personnel	Contact details of employees or personnel	Contact details of employees or personnel	Contact details of employees or personnel
<i>Special Personal Information</i>				
Race / ethnic origin				
Medical and health-related information				
Biometric information				
Criminal behaviour (where applicable)				

The recipients or categories of recipients of personal information

We may share personal information for the purposes set out above, as the case may be

-
- with our affiliates and subsidiaries and group companies. JCDecaux SA is the party responsible for the management of jointly used personal information;
- with service providers to provide operational services on our behalf, including (but not limited to) managing, supporting, operating or promoting our business, assisting with client support, email delivery, information analytics, administrative functions, and auditing;
- if you are our client's customer and our client requires personal information relating to you from us in order to respond to a query or request that they have received from you;
- with our employees (or those of our service providers) that require the personal information to do their jobs. These include our (or our service providers') responsible management, human resources, accounting, audit, compliance, information technology, or other personnel. Any of our (or our service providers') employees or personnel that handle your personal information will do so under strict confidentiality obligations;
- where you consent to the sharing of your personal information;
- in connection with any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company;
- for other legal reasons, including –
 - in response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process;
 - where necessary to comply with judicial proceedings, court orders or government orders;
 - to protect our rights, property or safety, or those of our affiliates, subsidiaries or business partners, you, or others; or
 - as otherwise required by applicable law.

Any third parties (other than in the case of a disclosure for any legal reason contemplated in the final bullet point above) with whom we share personal information are contractually required to implement appropriate data protection and security measures to protect personal information and are not permitted to use personal information for any purpose other than the purpose for which they are provided with or given access to personal information.

Planned transborder flows of personal information

We may send personal information outside of the jurisdiction in which it is collected for the above purposes, including for processing and storage by service providers in connection with such purposes. You should note that while personal information is out of that jurisdiction, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

JCDecaux SA can provide access to personal information to the companies of its group which are based outside of the Republic of South Africa for the above purposes.

Security Measures

We protect your personal information from accidental or unlawful destruction, loss, alteration, unauthorised access or disclosure by using a combination of physical, technical, operational and administrative security measures and safeguards and contractually require that third parties to whom we disclose your personal information do the same. These security measures and safeguards include, but are not limited to, the following:

- Physical security measures, including –
 - Access control for staff and visitors, including (but not limited to) security doors, access cards, etc
 - Internal security, including (but not limited to), implementation of a “clear desk, clear screen” policy, storing and securing personal, sensitive and confidential information by staff in locked desk drawers, cabinets and cupboards, locking of offices when unoccupied by staff, etc
- Cyber and IT-related security measures, including –
 - Logical access control
 - Encryption where applicable
 - Passwords and multifactor authentication
 - Antivirus and antimalware
 - Firewalls, Intrusion Detection Systems (IDS) and Intrusion Prevention Systems (IPS)
 - Acceptable usage of company assets, services, and devices
 - Remote access
 - Information security incident management
- Training and awareness
- Policies and Procedures

We also conduct regular audits, quality assurance and improvement assessments in order to monitor and update our security measures (as and when required) for the purposes of ensuring the confidentiality, integrity and availability of the information which is processed.

7. Availability of this PAIA manual

This PAIA manual has not been signed for security reasons. A signed copy is available free of charge at our offices during business hours alternatively, a signed copy may be made available to you on request and upon payment of a fee as set out in the Regulations.

8. Updating of this PAIA manual

This PAIA manual shall be updated from time to time.