



ACCESS TO INFORMATION MANUAL

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION
ACT, NO. 2 OF 2000

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1. DEFINITIONS

In this manual, unless the context clearly indicates otherwise:

- 1.1. “Act” means the Promotion of Access to Information Act, 2 of 2000 as amended from time to time;
- 1.2. “company” means SMD Technologies Proprietary Limited, a private company with registration number 2015/107801/07, duly incorporated in accordance with the laws of the RSA;
- 1.3. “customer” means a natural or juristic person who or which receives goods or services from the company;
- 1.4. “data subject” means the natural or juristic person to whom personal information relates;
- 1.5. “information regulator” shall bear the meaning ascribed thereto under POPIA;
- 1.6. “manual” means this manual, as amended from time to time, which is published in accordance with section 51 of the Act, together with all annexures thereto.
- 1.7. “minister” means the Minister of Justice and Correctional Services;
- 1.8. “personal information” has the meaning ascribed thereto under POPIA;
- 1.9. “POPIA” means the Protection of Personal Information Act, 4 of 2013, together with any regulations published thereunder;
- 1.10. “processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including, *inter alia*:
 - 1.10.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.10.2. dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or
 - 1.10.3. merging, linking, blocking, degradation, erasure or destruction;

- 1.11. “record” means record as defined in section 1 of the Act;
- 1.12. “request” means a request for access to a record of the company;
- 1.13. “requester” means any person or entity requesting access to a record that is under the control of the company;
- 1.14. “RSA” means the Republic of South Africa;
- 1.15. “special personal information” has the meaning ascribed thereto under POPIA;
- 1.16. “VAT” means Value-Added Tax;
- 1.17. “ZAR” means South African Rands.

2. PURPOSE

- 2.1. This manual has been compiled in accordance with the requirements of the Act. The company is a private body as defined in the Act, and this manual contains the information specified in section 51(1) of the Act, which is applicable to such a private body.
- 2.2. The purpose of this manual is to facilitate requests for access to records of the company as provided for in the Act.
- 2.3. This manual may be amended from time to time and once amendments have been affected, the latest version of this manual will be published in accordance with the Act.
- 2.4. A requester is invited to contact the information officer or deputy information officer using the contact details specified in clause 3.2 and 3.3 below, should he/she require any assistance with the use or content of this manual.
- 2.5. The reference to any information in addition to that specifically required in terms of section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

3. COMPANY INFORMATION AND CONTACT DETAILS

3.1. The details of the company are as follows:

Full name	SMD Technologies Proprietary Limited
Registration number	2015/107801/07
Business address	2 Lascelles Road Meadowbrook Edenvale 1609
Telephone number	011 608 3633
Email	sales@smdtechnologies.com
Website	http://www.smdtechnologies.com/

3.2. The details of the information officer are as follows:

Full name	Simca Maurice Diskin
Telephone number	011 608 3633
Email	PAIA@smdtechnologies.com

3.3. The details of the deputy information officer are as follows:

Full name	Nicole Stanton-Jones
Telephone number	011 608 3633
Email	PAIA@smdtechnologies.com

4. HOW TO ACCESS THE GUIDE

4.1. The information regulator has, in terms of section 10(1) of the Act, as amended, updated and made available the revised guide on how to use the Act (“guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in the Act and POPIA.

4.2. This guide is available in each of the official languages and in braille.

4.3. The guide contains a description of, *inter alia*:

- 4.3.1. the objects of the Act and POPIA;
- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of every deputy information officer of every private body designated in terms of section 17(1) of the Act, and section 56 of POPIA;
- 4.3.3. the manner and form of a request for access to a record of a private body contemplated in section 50;
- 4.3.4. the assistance available from the information regulator in terms of the Act and POPIA;
- 4.3.5. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by the Act and POPIA, including the manner of lodging:
 - 4.3.5.1. an internal appeal;
 - 4.3.5.2. a complaint to the information regulator; and
 - 4.3.5.3. an application with a court against a decision by the information regulator; and
 - 4.3.5.4. an application with a court against a decision on internal appeal or a decision by the information regulator or a decision of the head of a private body;
- 4.3.6. the provisions of section 51 of the Act requiring a private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.7. the provisions of section 52 of the Act providing for the voluntary disclosure of categories of records by a private body;
- 4.3.8. the notices issued in terms of section 22 and 54 of the Act regarding fees to be paid in relation to requests for access; and
- 4.3.9. the regulations made in terms of section 92 of the Act.
- 4.4. The guide is accessible on the information regulator's website, as well as from the offices of the information regulator during normal working hours. The details are as follows:

Physical address	JD House, 27 Stiemens Street Braamfontein Johannesburg 2001
Website	https://www.justice.gov.za/inforeg/index.html

5. RECORDS WHICH ARE AVAILABLE WITHOUT FORMAL REQUEST

- 5.1. No notices pertaining to the company have been published by the Minister in terms of section 52(2) of the Act.
- 5.2. Records of a public nature and other non-confidential records, such as statutory records maintained at the Companies and Intellectual Property Commission, may be accessed without the need to submit a formal application.
- 5.3. Employees may access their employment records directly from the company's human resources department without the need to submit a formal application.

6. RECORDS HELD IN TERMS OF OTHER LEGISLATION

- 6.1. Information is retained in terms of the following legislation and is usually available only to the persons or entities specified in such legislation. The legislation includes but is not limited to the following:

Legislation	Description of records
Basic Conditions of Employment Act, No. 75 of 1997	Employment contracts, time and attendance records, leave records, wage records.
Broad-Based Black Economic Empowerment Act, No. 53 of 2003	B-BBEE compliance documentation, scorecards, transformation plans.
Companies Act, 2008, No. 71 of 2008	Company registration documents, share registers, minutes of meetings, annual financial statements.
Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993	Injury-on-duty records, medical reports, claims forms.

Competition Act, No. 89 of 1998	Records of compliance with competition laws, merger filings, correspondence with regulators.
Consumer Protection Act, Act 68 of 2008	Consumer complaints, product recall records, contracts with consumers.
Copyright Act, No. 98 of 1978	Copyright registrations, licensing agreements, correspondence related to copyright claims.
Customs and Excise Amendment Act, 45 of 1995	Import/export records, customs declarations, invoices.
Electronic Communications and Transactions Act, No. 25 of 2002	Electronic communications records, digital contracts, e-commerce transaction logs.
Employment Equity Act, No. 55 of 1998	Employment equity plans, reports submitted to the Department of Labour.
Employment Tax Incentive Act, No. 26 of 2013	Records of qualifying employees, payroll documentation, incentive claims.
Income Tax Act, No. 58 of 1962	Tax returns, financial statements, payroll tax records.
Intellectual Property Laws Amendment Act, No. 28 of 2013	Intellectual property registrations, licenses, correspondence.
Labour Relations Act, No. 66 of 1995	Employment contracts, disciplinary records, grievance and dispute records.
National Credit Act, No. 34 of 2005	Credit agreements, debt collection records (if applicable).
National Regulator for Compulsory Specifications Act, 2008	Product compliance certificates, testing records.
National Road Traffic Act, No. 93 of 1996	Vehicle registration, roadworthiness certificates (if applicable).
Occupational Health & Safety Act, No. 85 of 1993	Health and safety plans, risk assessments, incident reports.
Prevention and Combating of Corrupt Activities Act, Act 12 of 2004	Whistleblower reports, records of investigations (if applicable).
Protected Disclosures Act No. 26 of 2000	Whistleblower policies and procedures, reports.
Protection of Personal Information Act, No. 4 of 2013	Data processing records, consent forms, data subject requests.

South African Revenue Services Act, 34 of 1997	Tax records, correspondence with SARS.
Tax Administration Act, No. 28 of 2011	Tax returns, supporting documents, audit files.
Trademarks Act, No. 193 of 1994	Trademark registrations, licensing agreements.
Unemployment Insurance Contributions Act, No. 4 of 2002	UIF returns, employee earnings records.
Value-Added Tax Act, No. 89 of 1991	VAT returns, invoices, supporting documents.

- 6.2. Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a requester access on a basis other than as set out in the Act, we shall update the list accordingly.
- 6.3. If a requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the requester is required to indicate what legislative right the request is based on, to allow the information officer the opportunity of considering the request in light thereof. Records kept in terms of the above legislation may, in certain instances (and insofar as the information contained therein is of a public nature) be available for inspection without a person having to request access thereto in terms of the Act.

7. RECORDS HELD BY THE COMPANY

The following is a list of the subjects on which the company holds records and the categories into which these falls. The records listed below will not in all instances be provided to the requestor as the requestor is required to identify the right it is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right. The procedure in terms of which such records may be requested from the company is set out in clause 13 of this manual:

Subjects on which the company holds records	Categories of records
Company records	Documents of incorporation

	• Shareholder records, registers, minutes and resolutions • Director records, registers, minutes and resolutions • Committee and sub-committee meetings • Company policies and procedures • Internal correspondence
Financial and management records	• Financial records and reports • Management accounts and records • Accounting records • Audit records and reports • Debtors and creditors records • Taxation records • Banking records • Financial policies and procedures • Purchase and order records • Insurance records • Asset registers
Personnel records	• A list of company personnel • Any personal records provided to the company by its personnel • Conditions of employment and other personnel-related contractual and quasilegal records • Personnel records, including internal evaluation records, performance records, promotions, retirements and disciplinary records • Skills and development plans • Payroll records • Termination payments • Employment equity plans • Employee tax information • Internal policies and procedure, including code of conduct • Health and safety records • Training schedules and manuals

	• General correspondence and other internal records • Recruitment selection, advertising of positions, and appointments • Personal information relating to prospective employees including curricula vitae and application forms
Customer-related records	• Customer list and dealer applications • Terms and conditions of trade • Any records and information provided by the customer to the company, including personal and special personal information • Any credit records or other research conducted by the company in respect of its customers or research derived by the company from its customers and their activities • Any records that a third party has provided to the company either directly or indirectly • Records generated by or within the company pertaining to the customer, including transactional records • Correspondence with customers
Supplier-related records	• Supplier list • Terms and conditions of trade • Any records and information provided by the supplier to the company, including personal and special personal information • Any research conducted by the company in respect of its suppliers or research derived by the company from its suppliers and their activities • Any records that a third party has provided to the company either directly or indirectly • Records generated by or within the company pertaining to the supplier, including transactional records • Correspondence with suppliers
Information technology records	• Computer software

	• IT technology capabilities • Support and maintenance agreements • Records regarding computer systems • Programs including software license agreements • IT policies and procedures • Network diagrams • Configuration setups • Systems and user manuals • Asset register for IT-related material • System performance records • General correspondence
Legal records	• All agreements concluded by the company • Litigation records • Regulatory records
Product records	• Product compliance applications, certificates, testing and conformity assessment records • Intellectual property registrations
Other records	• Marketing records • Third party records

8. PURPOSE OF PROCESSING PERSONAL INFORMATION

8.1. The company processes personal information and special personal information, where applicable, to *inter alia*:

8.1.1. transact and communicate with, *inter alia*, customers, suppliers, service providers;

8.1.2. marketing our products;

8.1.3. resolve complaints and/or queries;

8.1.4. conduct criminal, employment history, qualification and reference checks on prospective employees;

8.1.5. develop, monitor and improve our systems, processes and service delivery;

8.1.6. comply with regulatory and contractual obligations;

8.1.7. monitor and control access to the company premises.

8.2. The below is a list of data subjects and a non-exhaustive list of personal information that the company may process:

Category of data subject	Personal information that may be processed
Employees (including former employees)	Name, personal contact information, date of birth, identity number, email address, user id, job title, employment history, personal interests, educational history, gender, nationality, salary and benefit details, images, date of hire, manager, performance reviews, details of internal training undertaken, professional contact information (email address, business phone number, job title, division), travel and expenses data, grievances, record of app and website visits, IP address, cookie data, preferences, financial data, user account details, compliance investigatory data such as whistle-blower reports, editorial content, CCTV footage, biometric information, any other related personal information
Prospective employees	Name, personal contact information, date of birth, identity number, email address, job title, employment history, personal interests, educational history, gender, nationality, salary and benefit details, images, professional contact information (email address, business phone number, job title, division), CCTV footage, any other related personal information
Juristic entities (including customers, suppliers, independent contractors and other third parties)	Name, company/entity registration number, tax related information, BEE certificates, contact details, address, bank details, agreements, any other related individual data (including director

	information), correspondence of a private/confidential nature
Natural persons (including customers, suppliers, independent contractors and other third parties)	Full names, contact details, physical and postal addresses, date of birth, identity number, tax related information, nationality, gender, correspondence of a private/confidential nature

- 8.3. The company will retain personal information only for as long as is necessary to accomplish its legitimate business purposes or for as long as may be permitted or required by applicable law.

9. CATEGORIES OF RECIPIENTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED

Depending on the nature of the personal information, the company may supply information or records to the following categories of recipients:

- 9.1. statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data;
- 9.2. any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules;
- 9.3. South African Revenue Services, or another similar authority;
- 9.4. South African Police Services and South African Qualifications Authority;
- 9.5. cloud-based services such as data storage, network, email and security services;
- 9.6. third party organizations providing legal services;
- 9.7. auditing and accounting bodies;
- 9.8. to a prospective purchaser of any of the company, including its business and/or assets;
- 9.9. anyone making a successful application for access in terms of the Act or POPIA; and

- 9.10. subject to the provisions of POPIA and other relevant legislation, the company may share information about data subject's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which the company operates.

10. TRANSBORDER FLOWS OF PERSONAL INFORMATION

The company may need to transfer a data subject's personal information to its related parties and service providers in countries outside of the RSA, these countries may not have data-protection laws which are similar to those of the RSA. Where this is done, the company will transfer this personal information in accordance with the provisions of POPIA.

11. INFORMATION SECURITY MEASURES

- 11.1. The security and confidentiality of personal information is important to the company. We have implemented reasonable technical, administrative, and physical security measures to protect personal information from unauthorised access or disclosure and improper use. We are committed to ensuring that our security measures which protect your personal information are continuously reviewed and updated where necessary.
- 11.2. Personal information is stored on secured servers, personal computers and mobile devices and in secure manual record-keeping systems.
- 11.3. In processing any personal information, the company has deployed a range of physical, electronic, and other security measures to protect the security, confidentiality and integrity of the personal information that we hold. These measures include, *inter alia*:
- 11.3.1. access control: access to our information systems is controlled through identity and access management controls and personal information is only made available to personnel who require the personal information to perform a specific job/task;
- 11.3.2. internal policies and training: employees are bound by internal information security policies and must process information securely. All employees must complete training about privacy and information security;
- 11.3.3. third party agreements: any third party who processes personal information on behalf of the company are bound to implement appropriate safeguards and comply with POPIA;

- 11.3.4. information technology safeguards: the company has implemented firewalls and malware protection to safeguard against security breaches;
- 11.3.5. ongoing monitoring: we regularly monitor and review our compliance with internal policies and industry best practice.

12. CATEGORIES OF REQUESTORS

The capacity under which a requestor makes a request for records defines the category in which the requestor will fall into. The following is a non-exhaustive list of requesters:

- 12.1. data subject who makes requests about themselves;
- 12.2. representative who makes a request on behalf of the data subject(s);
- 12.3. third party who requests information about a data subject; or
- 12.4. public body who requests information in the public interest.

13. HOW TO REQUEST ACCESS TO RECORDS HELD BY THE COMPANY

- 13.1. The Act grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. If a public body lodges a request in terms of the Act, the public body must be acting in the public interest.
- 13.2. POPIA provides that a data subject may, upon proof of identity, request the company to confirm, free of charge, all the information it holds about the data subject. POPIA provides that a data subject may object, at any time, to the processing of personal information by the company, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing.
- 13.3. A request for access to records held by the company in terms of section 50 of the Act must be made on the form contained in the regulations, which can be accessed at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

- 13.4. The request must be made to the information officer of the company at its business address or email address, specified in clause 3 above.
- 13.5. A requester must provide sufficient detail on the prescribed form to allow the company to identify the record or records which have been requested and the identity of the requester, this includes the following:
- 13.5.1. the records requested;
 - 13.5.2. proof of identity of the requester;
 - 13.5.3. the form of access required if the request is granted;
 - 13.5.4. the email address, postal address or fax number of the requester;
 - 13.5.5. the requester must identify the right that he or she is seeking to exercise by accessing records held by the company and to explain why the particular record or records requested is or are required for the exercise or protection of that right.
- 13.6. If the request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request. This information must be to the reasonable satisfaction of the information officer and the requester must clearly disclose the right they wish to protect.
- 13.7. If a person is unable to complete the prescribed form because of illiteracy or disability, they may make the request orally.
- 13.8. The information officer, as soon as reasonably possible and within 30 days after the request has been received, shall decide whether or not to grant the request.
- 13.9. The requester will be notified of the decision of the information officer of the company in the prescribed form.
- 13.10. If the request is granted, the requester shall be informed by the information officer in the manner indicated by the requester in the prescribed form of:
- 13.10.1. the prescribed fees (as per clause 14) to be paid for the information; and

- 13.10.2. the format in which access will be given.
- 13.11. After access is granted, actual access to the record(s) requested will be given as soon as reasonably possible.
- 13.12. If the request for access is refused, the information officer shall advise the requester in writing of the refusal. The notice of refusal shall state adequate reasons for the refusal.
- 13.13. In the event that the information officer fails to respond within 30 days after a request has been received, it is deemed, in terms of section 58 read together with section 56(1) of the Act, that the information officer has refused the request.
- 13.14. The information officer may in writing to the requestor extend the 30 day period for a further 30 days if:
 - 13.14.1. the request is for a large number of records; or
 - 13.14.2. the records in search are not stored at the company's business address.

14. PRESCRIBED FEES

- 14.1. Payment details will be provided to the requestor in the event of an approved request and must be made by direct deposit into the company's nominated bank account.
- 14.2. The fees payable (including VAT) are as follows:
 - 14.2.1. ZAR30.00 per hour, or part thereof, to search for and prepare the record for disclosure ("access fee");
 - 14.2.2. ZAR2.00 for every photocopy of an A4 size page, or part thereof;
 - 14.2.3. ZAR2.00 for every printed copy of an A4 size page or part thereof held on a computer or in electronic or machine-readable form;
 - 14.2.4. ZAR40.00 for a copy, including audio records, in a computer-readable form on a compact disc provided by the requestor;

- 14.2.5. ZAR60.00 for a copy, including audio records, in a computer-readable form on a compact disc provided by the company;
- 14.2.6. transcriptions of audio records and copies of visual images will be outsourced and will be charged as per the fee levied by the service provider.
- 14.3. The information officer may request a deposit of one third of the access fee once six hours has been exceeded in respect of searching for and preparing the record.

15. INFORMATION REQUESTED ABOUT A THIRD PARTY

- 15.1. Where any information is requested from the company that relates to a third party, the company is required to notify the third party of the request.
- 15.2. The third party has an opportunity to grant his, her or its consent to the disclosure of the record or to make representations as to why the requested record should not be disclosed to the requester.
- 15.3. If the company decides to grant access to the record, it will notify the affected third party again. The third party is entitled to apply to court in relation to that decision. The court will then determine whether the record should be disclosed by the company or not.

16. GROUNDS OF REFUSAL OF ACCESS

- 16.1. The company may, and must in certain instances, refuse access to records on any of the grounds set out in Chapter 4 of Part 3 of the Act, which include, *inter alia*, the following grounds:
 - 16.1.1. the disclosure would involve the unreasonable disclosure of personal information about a third party (natural person), including a deceased individual (see section 63 of the Act);
 - 16.1.2. the record contains (a) trade secrets of a third party, (b) financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party, or (c) information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a

disadvantage in contractual or other negotiations; or to prejudice that third party in commercial competition (see section 64 of the Act);

- 16.1.3. the disclosure of the record would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement (see section 65 of the Act);
- 16.1.4. the disclosure could reasonably be expected to endanger the life or physical safety of an individual (see section 66(a) of the Act);
- 16.1.5. the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege (see section 67 of the Act);
- 16.1.6. the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose: (a) the third party; (b) a person that is or will be carrying out the research on behalf of the third party; or (c) the subject matter of the research, to serious disadvantage (see section 69 of the Act).
- 16.1.7. the disclosure would be likely to prejudice or impair: (i) the security of: (aa) a building, structure or system, including, but not limited to, a computer or communication system; (bb) a means of transport; or (cc) any other property; or (ii) methods, systems, plans or procedures for the protection of: (aa) an individual in accordance with a witness protection scheme; (bb) the safety of the public, or any part of the public; or (cc) the security of property contemplated in subparagraph (i) (aa), (bb) or (cc) (see section 66(b) of the Act);
- 16.1.8. the record:
 - 16.1.8.1. contains trade secrets of the company;
 - 16.1.8.2. contains financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of the company;
 - 16.1.8.3. contains information, the disclosure of which could reasonably be expected:
 - 16.1.8.4. to put the company at a disadvantage in contractual or other negotiations; or

- 16.1.8.5. to prejudice the company's commercial competition; or
- 16.1.8.6. is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by the company, except insofar as it is required to give access to a record to which access is granted in terms of the Act (see section 68(1) of the Act).
- 16.2. Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.
- 16.3. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.
- 16.4. If a requested record cannot be found or if the record does not exist, the information officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the information officer refuses access to such record.

17. REMEDIES AVAILABLE IF REQUEST TO ACCESS INFORMATION IS REFUSED

- 17.1. The decision of the information officer is final, and the company does not have an internal appeal procedure.
- 17.2. A requester aggrieved by a decision of the information officer may, within 180 days of the information officer's decision, submit a complaint to the information regulator in the prescribed manner and form (see section 77A of the Act). Alternatively, a requester is entitled to apply to a court of competent jurisdiction for appropriate relief (see section 78 of the Act).
- 17.3. A requestor may also bring an application to court in the ordinary course. For this purpose, any reference to an application to court includes an application to a relevant magistrate's court.

18. AVAILABILITY OF THIS MANUAL

A copy of this manual is available:

- 18.1. on our website (accessible through the link enclosed in our privacy policy);
- 18.2. by sending a request for a copy to the information officer by email;
- 18.3. at the company's business address during the business hours;
- 18.4. to any person, upon request and subject to the payment of a reasonable fee. A fee for a copy of the manual, as contemplated in the regulations, shall be payable per A4-size photocopy made.

19. UPDATING OF THIS MANUAL

This manual will be updated by the information officer on a regular basis.