

**MANUAL IN TERMS OF SECTION 51 OF
THE PROMOTION OF ACCESS TO INFORMATION ACT (ACT 2 OF 2000)
(the "Act")**

**CANON SOUTH AFRICA PTY LTD
Registration number 1999/021667/07**

Canon

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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; and |
| 1.8 “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 2.1 Check the categories of records held by a body 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 body, by providing a description of the subjects on which the body holds records, and the categories of records held on each subject;
- 2.3 Know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 Access all the relevant contact details of the Information Officer and Deputy Information Officer 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 Know if the body 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;
- 2.7 Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 Know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 Know if the body 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

2.10 Know whether the body 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 CANON SOUTH AFRICA PTY LTD

The responsibility for the administration of, and compliance with the Acts, has been delegated to the Strategic Planning and Programs Manager of Canon South Africa.

Requests pursuant to the provisions of the Acts should be directed as follows:

Information Officer: Information Officer - Section 51(1)(A)(I)

Name: Mrs Marianna Burger
Postal address: P.O. Box 68497, Highveld Park, 0169
Street address: 1st Floor, Block C, Southdowns Office Park, 22 Karee Street, Southdowns, Centurion.
Business phone: + 27 (0)12 675 4900
Email address: cza_compliance@canon.co.za

Deputy Information Officer:

Name: Miss Nthabiseng Mosima
Postal address: P.O. Box 68497, Highveld Park, 0169
Street address: 1st Floor, Block C, Southdowns Office Park, 22 Karee Street, Southdowns, Centurion.
Business phone: + 27 (0)12 675 4900
Email address: cza_compliance@canon.co.za

For more information on Canon, please visit: www.canon.co.za

Availability of this manual

This manual is available for inspection on the Canon website at www.canon.co.za and during normal business hours (08:00 – 16:30) at the Canon South Africa Head Office:

1st Floor, Block C
Southdowns Office Park
22 Karee Street (Off John Vorster)

Tel: (+27) 12 675 4900
Co. Reg. No: 1999/021667/07

Southdowns, Centurion
P.O. Box 68497
Highveld Park
0169

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

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

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

4.3. The aforesaid Guide contains the description of:

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of:

4.3.2.1. the Information Officer of every public body, and

4.3.2.2. every Deputy Information Officer of every public and private

body designated in terms of section 17(1) of PAIA and section 56 of POPIA

4.3.3. the manner and form of a request for:

4.3.3.1. access to a record of a public body contemplated in section 113 and

4.3.3.2. access to a record of a private body contemplated in section 504

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6. 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

4.3.6.1. an internal appeal;

4.3.6.2. a complaint to the Regulator; and

4.3.6.3. 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;

4.3.7. the provisions of sections 14(5) and 51(6) requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8. the provisions of sections 15(7) and 52(8) providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 the notices issued in terms of sections 22(9) and 54(10) regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92(11)

4.4. 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.

4.5. The Guide can also be obtained:

4.5.1. upon request to the Information Officer

4.5.2. from the website of the Regulator <https://www.justice.gov.za/inforeg/>.

The PAIA Manual should contain the contact details of the Regulator as follows:

Physical address: Woodmead North Park
54 Maxwell Drive
Woodmead
Johannesburg
2191

Email address: enquiries@inforegulator.org.za

Website: <https://www.justice.gov.za/inforeg/>

Toll Free: +27 80 001 7160

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

- English

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

- a. Records of a public nature, typically those disclosed on the website, in various annual reports and brochures, may be accessed without the need to submit a formal application.
- b. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

6. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

6.1 Records and documents are retained in terms of legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations and/or contractual agreements, records that are to be made available in terms of PAIA and/or POPI shall be made available for inspection by interested parties in terms of the requirements of PAIA. The request to access must be done in terms of the requirements of PAIA.

6.2 Whilst records are maintained in respect to the following laws, this does not imply that a request for access to such records shall be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA and/or POPIA.

6.3 Records that are kept in terms of the following legislation:

| Category of Records | Applicable Legislation |
|--|---|
| <ol style="list-style-type: none"> 1. Employee contracts and letters of appointment 2. Attendance and leave records 3. Remuneration and benefits documentation 4. Disciplinary and grievance records | Basic Conditions of Employment Act, No. 75 of 1997 |
| <ol style="list-style-type: none"> 1. PAIA Manual and internal compliance records 2. Records of PAIA requests received and processed 3. Correspondence with the Information Regulator 4. Internal access and disclosure procedures | Promotion of Access to Information Act, No. 4 of 2013 |
| <ol style="list-style-type: none"> 1. Memorandum of Incorporation (MOI) 2. Shareholder and director registers 3. Annual financial statements and audit reports 4. Minutes of board and shareholder meetings | Companies Act, No. 71 of 2008 |

| | |
|--|---|
| <ol style="list-style-type: none"> 1. Records of workplace incidents and injuries 2. COIDA registration documents and returns 3. Health and safety incident investigation reports | <p>Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993</p> |
| <ol style="list-style-type: none"> 1. Workforce demographic and statistical reports 2. Employment equity and affirmative action reports submitted to the Department of Labour | <p>Employment Equity Act, No. 55 of 1998</p> |
| <ol style="list-style-type: none"> 1. Website terms of use and privacy notices 2. Electronic transaction records (online purchases, client orders) 3. Data and information security policies | <p>Electronic Communications and Transactions Act, No. 25 of 2002</p> |
| <ol style="list-style-type: none"> 1. Employee tax records (PAYE, IRP5, IT3) 2. Corporate income tax returns and correspondence with SARS 3. Tax compliance certificates and assessments | <p>Income Tax Act, No. 58 of 1962</p> |
| <ol style="list-style-type: none"> 1. Import and export documentation 2. Customs declarations and duties paid 3. Shipping, freight, and logistics records 4. Correspondence with SARS Customs Division | <p>Customs and Excise Act, No. 91 of 1964</p> |
| <ol style="list-style-type: none"> 1. Skills development and training policies 2. Records of training and employee development initiatives | <p>Skills Development Levies Act, No. 9 of 1999</p> |

7. DESCRIPTION OF THE SUBJECTS ON WHICH CANON SOUTH AFICA PTY LTD HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

7.1 Records are maintained on the below categories and subject matters. However, recording of a category or subject in this manual does not imply that a request for access to such records will be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA and/or POPIA and other laws.

7.2 A description and classification of the records held are as follows:

| Department / Business Unit | Legislation that impacts the processing of personal information | |
|------------------------------|---|---|
| Sales & Marketing | → | The Companies Act No. 71 of 2008 |
| | → | Occupational Health and Safety Act, No 85 of 1993 |
| | → | Consumer Protection Act, 2008 |
| | → | Competition Act, 1998 |
| | → | Electronic Communications and Transactions Act, 2002 |
| | → | Protection of Personal Information Act 4 of 2013 |
| | → | Electronic Communications and Transactions Act, 2002 |
| Finance | → | The Companies Act No. 71 of 2008 |
| | → | Financial Intelligence Centre Act, 2011 |
| | → | Income Tax Act, No 58 of 1962; |
| | → | Value Added Tax Act, No 89 of 1991 |
| | → | Consumer Protection Act, 2008 |
| | → | Electronic Communications and Transactions Act, 2002 |
| | → | National Credit Act No. 34 of 2005; |
| | → | Preferential Procurement Policy Framework Act, 2000 |
| | → | Promotion of Access to Information Act, 2000 |
| Human Resources | → | Basic Conditions of Employment Act, No 75 of 1997 |
| | → | Employment Equity Act No. 55 of 1998 |
| | → | The Labour Relations Act No. 66 of 1995 |
| | → | The Pension Funds Act No. 24 of 1956 |
| | → | Skills Development Act, 1998 |
| | → | Promotion of Access to Information Act, 2000 |
| | → | Compensation for Occupational Injuries and Diseases Act |
| | → | Unemployment Insurance Act, 2001 |

| | | |
|---------------------------------|---|---|
| | → | Skills Development Levies Act 9 of 1999 |
| | → | Medical schemes Act, 131 of 1998 |
| Health and Safety | → | Occupational Health and Safety Act 85 of 1993 |
| | → | Compensation for Occupational Injuries and Diseases Act, 130 of 1993(1) |
| | → | Disaster Management Act, 2002 |
| | → | The National Environmental Management: Waste Act 59 of 2008 |
| | → | Consumer Protection Act, 2008 |
| Corporate Communications | → | Consumer Protection Act, 2008 |
| | → | Electronic Communications and Transactions Act, 2002 |
| | → | Regulation of Interception of Communications and Provisions of Communications-related Information Act 70. of 2002 |
| | → | Competition Act, 1998 |
| Information Technology | → | Electronic Communications and Transactions Act, 2002 |
| | → | Protected Disclosures Act, 26 of 2002(1) |
| | → | Regulation of Interception of Communications and Provisions of Communications-related Information Act 70. of 2002 |
| Business Operations | → | Electronic Communications and Transactions Act, 2002 |
| | → | Occupational Health and Safety Act 85 of 1993 |
| | → | Promotion of Access to Information Act, 2000 |
| | → | Basic Conditions of Employment Act, No 75 of 1997 |
| | → | Employment Equity Act No. 55 of 1998 |
| | → | Skills Development Act, 1998 |
| | → | Consumer Protection Act, 2008 |
| Service and Support | → | Electronic Communications and Transactions Act, 2002 |
| | → | Occupational Health and Safety Act 85 of 1993 |
| | → | Promotion of Access to Information Act, 2000 |
| | → | Basic Conditions of Employment Act, No 75 of 1997 |
| | → | Employment Equity Act No. 55 of 1998 |
| | → | The Labour Relations Act No. 66 of 1995 |
| | → | Skills Development Act, 1998 |
| | → | Consumer Protection Act, 2008 |

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The processing of personal Information will only be done in accordance with the provisions of POPIA. The Personal Information that will be processed includes the below but not limited to:

- 8.1.1 Rendering services.
- 8.1.2 Employee administration.
- 8.1.3 Transacting with suppliers.
- 8.1.4 Maintaining records.
- 8.1.5 Recruitment purposes.
- 8.1.6 General administration, financial and tax purposes.
- 8.1.7 Legal purposes.
- 8.1.8 Investigating of and preventing fraud.
- 8.1.9 Responding to website enquiries

Description Of the Categories of Data Subjects and Of the Information Or Categories Of Information Relating Thereto

| Category | Personal Information | Availability |
|-------------------|---|-----------------------------|
| Employees | ID number, contact details, physical and postal address, date of birth, age, marital status, race, disability information, employment history, criminal/background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension/provident fund information), details related to employee performance, disciplinary procedures, employee disability information, employee pension and provident fund information, employee contracts, employee performance records, payroll records, electronic access records, physical access records, CCTV records, health and safety records, training records, employment history, time and attendance records. | Not automatically available |
| Service Providers | Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, BBB-EE certificates, invoices, and contractual documentation. | Not automatically available |
| Business Partners | Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, and contractual documentation. | Not automatically available |
| Customers | Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, and contractual documentation. | Not automatically available |
| Job Applicants | Name, surname, address, contact details, email address, telephone number, details of qualifications, skills, experience and employment history, information about current level of remuneration, including benefit | Not automatically available |

| | | |
|--|--|--|
| | entitlements, disability requirements during the recruitment process, and information regarding the new job applicant's entitlement to work in South Africa. | |
| | | |

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

8.2.1 We may share the personal information of our data subjects for any of the purposes outlined in Section 8.1, with the following:

- 8.2.1.1 Selected business partners who provide products and services under one of our brands; and
- 8.2.1.2 Service providers and agents who perform services on our behalf

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

| Category of personal information | Personal Information that may be processed |
|---|---|
| Customers / Clients | name, address, registration numbers or identity numbers, employment status and bank details |
| Service Providers | names, registration number, vat numbers, address, and bank details |
| Employees | address, qualifications, gender and race |

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

8.2.2 We do not share the personal information of our data subjects with any third parties, except if:

- 8.3.2.1 We are obliged to provide such information for legal or regulatory purposes.
- 8.3.2.2 We are required to do so for purposes of existing or future legal proceedings,
- 8.3.2.3 We are selling one or more of our businesses to someone to whom we may transfer our rights under any customer agreement we have with you.
- 8.3.2.4 We are involved in the prevention of fraud, loss, bribery or corruption.
- 8.3.2.5 They perform services and process personal information on our behalf.
- 8.3.2.6 This is required to provide or manage any information, products and/or services to data subjects; or
- 8.3.2.7 Needed to help us improve the quality of our products and services.

| Category of personal information | Recipients or Categories of Recipients to whom the personal information may be supplied |
|---|--|
| Employee Information name, ID, contact details, employment history, performance data, payroll information | Government and regulatory bodies (SARS, Department of Labour, COIDA, UIF) External payroll administrators and benefit providers Auditors and external legal advisers Training and development service providers |
| Supplier and Service Provider Information company details, contact persons, banking details, tax registration | External auditors Regulatory bodies (SARS, CIPC) Financial institutions for payment processing |
| Marketing and Communication Data name, email, preferences, interaction history, consent records | Marketing agencies and research partners Canon EMEA Marketing Division CRM platform and analytics service providers Email distribution and event management service providers |
| | |

- 8.3.3 We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them.
- 8.3.4 We will only disclose personal information to government authorities if we are required to do so by law.
- 8.3.5 Our employees, and our suppliers, are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

8.4 Planned Transborder Flows of Personal Information

We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.

We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of the POPI Act.

We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section 8.5.

8.3 General Description of Information Security Measures to Be Implemented by The Responsible Party To Ensure The Confidentiality, Integrity And Availability Of The Information

Reasonable technical and organisational measures have been implemented for the protection of personal information processed. In terms of the POPI Act, operators are third parties that process personal information.

Please refer to our privacy trust centre for more detailed information:

[Technical & Organisational Measures_5f830780ee11](#)

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 On [Privacy Notice - Canon South Africa](#) if any;

9.1.2 Head office of Canon South Africa Pty Ltd for public inspection during normal business hours;

9.1.3 To any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 To the Information Regulator upon request.

9.2 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.

10. UPDATING OF THE MANUAL

The head of Privacy at Canon South Africa will on a regular basis update this manual.

Issued by

Marianna Burger

Marianna Burger
Information Officer

If a data subject that wishes to:

- object to the processing of their personal information must complete the form attached hereto as Appendix C and;
- request a correction or deletion of personal information or the destruction or deletion of a record of personal information must complete the form attached hereto as Appendix D and submit it to the Information Officer.

The purpose of this section is to provide directive and guidance on the process to follow when requesting information from Canon South Africa Pty Ltd.

- **The Requestor** should contact Canon South Africa Pty Ltd.'s Information Officer to obtain guidance on the process to follow when sending documentation containing personal information. This includes application forms and proof of identification documents.
- **The prescribed** form must be used and completed to make the request for access to a record (refer to [Appendix A](#)).
- **Proof of identification** of the Requestor (and related third parties acting on behalf of the Requestor) must be provided on submitting the request form.
- **The requester** must specify the right that they are seeking to protect or that they wish to exercise and provide an explanation as to why the requested records are required for the protection or exercise of that right.
- **If the request** is made on behalf of another person, then proof is required of the capacity in which the requester is making the request. Classification | Public
- **Proof of identity** must be provided in the form of a certified copy of the Requestor's and/or delegate's identity document or passport via secure methods provided by the Information Officer in the initial correspondence.
- **An initial response** to a request will take approximately 30 days. The Information Officer may extend the period by an additional 30 days depending on the complexity of the request requirements.
- **Please note** that an application for access to information can be refused if the application does not comply with the requirements of PAIA.
- **The successful** completion and submission of the access request does not automatically allow the Requestor access to the requested records.
- **If access to a record/information** is granted, the Requestor will be notified, and the notification will include the following:
 - An indication of the access fee that should be paid upon gaining access (if any).
 - An indication of the form in which the access will be granted.
- **If access to a record/information is denied**, the Requestor will be notified, and will include the following:
 - Adequate reasons for the refusal.
 - Process to appeal the refusal.

→ **Should the requester** not be satisfied with the decision of the Information Officer, the Requester may apply to court for relief. In terms of PAIA, the said application must be made within 180 days after the decision has been made by the Information

Prescribed Request Fees

Prescribed fees were published by the Minister of Justice and Constitutional Development in the Government Gazette No. 23119, General Notice No. 187 of 15 February 2002.

Please refer to Appendix B for Canon South Africa Pty Ltd.'s fee structure.

Appendices

Appendix A: Request Form

REQUEST FOR ACCESS TO RECORD (Form 2, Regulation 7)

Appendix B: OUTCOME OF REQUEST AND OF FEES PAYABLE (Form 3, Regulation 8)