

**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. Introduction

The Promotion of Access to Information Act, No. 2 of 2000 (the “**PAIA**”) seeks to give effect to the constitutional right to access information as contained in section 32 of the Bill of Rights. The PAIA seeks to advance the values of transparency and accountability. The PAIA establishes certain statutory rights of requesters to access records of a private body if:

- that record is required for the exercise or protection of any rights;
- that requester complies with all the procedural requirements; and
- access is not refused in terms of any ground referred to in the PAIA.

The Protection of Personal Information Act, No. 4 of 2013 (the “**POPI Act**”) seeks to give effect to the constitutional right to privacy as contained in section 14 of the Bill of Rights. The POPI Act seeks to safeguard personal information by regulating the manner that the information may be processed by public and private bodies.

The POPI Act provides that data subjects have the right to have their personal information processed in accordance with the conditions for the lawful processing of personal information, which are set out in the POPI Act.

One of the requirements specified in the PAIA, is the compilation of an information manual that provides information which includes the types and categories of records held by a private body (this relates to PAIA) as well certain information relating to the processing of personal information (this relates to the POPI Act).

The PAIA and the POPI Act are collectively referred to in this document as the “**Acts**”.

1.1 Scope and purpose of this manual

This document serves as the Companies’ information manual and provides reference to the records held by the Company as well as the personal information processed by the Company from time to time.

1.2 About Canon

Canon is the leading name in imaging and has been for the past 80 years. We are the leading provider of consumer, business-to-business, and industrial digital imaging solutions.

We are utilising our imaging technologies to go beyond the rich line up of our existing products to cultivating new areas of business where our imaging technology can push the boundaries of what is possible.

By constantly tackling new challenges, we firmly believe that we can uphold

our
corporate philosophy of “[Kyosei](#)” which conveys our dedication to seeing
all people, regardless of race, religion or culture, harmoniously living and
working together for the common good and to contribute to a
prosperous society.

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

1.3 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)

Southdowns, Centurion

P.O. Box 68497
Highveld Park
0169

Tel.:(+27)12 – 675-4900

www.canon.co.za

Co. Reg. No.

1999/021667/07

Tel.:(+27)12 – 675-4900

2. Canon South Africa Pty Ltd Contact Details

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

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: 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: 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

3. Guide of the South African Human Rights Commission

Guide on how to use the ACT, ACT (Section 51(1) (B) read with Section 10 of the Act)

3.1 A Guide has been compiled in terms of Section 10 of the PAIA by the Human Rights Commission.

It contains information required by a person wishing to exercise any right contemplated by the PAIA. It is available in all the official languages. The Guide is available for inspection, *inter alia*, at the office of the offices of the Human Rights Commission at Braam park Forum 3, 33 Hoofd Street, Braamfontein, South Africa and on its website at www.sahrc.org.za.

The Information Regulator is required to update (and make available) the Guide to include information required by persons wishing to exercise any right contemplated

in the POPI Act. The updated Guide will be available from the Information Regulator in the manner prescribed.

3.2 The Human Rights Commission may be contacted directly at:

The South African Human Rights Commission EAIA
Unit
The Research and Documentation Department

Postal address:	Private Bag 2700 Houghton 2041 Private Bag 2700
Telephone:	(011) 877 3600
e-mail address	info@sahrc.org.za
Website:	www.sahrc.org.za

4. Records automatically available

Information that is obtainable via the Canon website about Canon is automatically available and need not be formally requested in terms of this manual.

The following categories of records are automatically available for inspection, purchase, or photocopying:

- 4.1 brochures
- 4.2 press releases
- 4.3 publication; and
- 4.4 various other marketing and promotional material

5. Records held in accordance with other legislation

Section 51(1)(D) of the Act

Records are available in accordance with the following current South African legislation (only to the extent that the relevant Act makes provision for the disclosure of records and only to the person or persons to whom and in the circumstances in which disclosure is compulsory)

Department / Business Unit	Legislation that impact 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 & 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
	→ The Labour Relations Act No. 66 of 1995
	→ Skills Development Act, 1998
	→ Consumer Protection Act, 2008
Services 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

6. Categories of Records held by Canon South Africa Pty Ltd

Records: Categories and subject of records – Section 51(1) (E)

The information contained in this section is intended to identify the main categories of records held by Canon and to help the requester to gain a better understanding of the main business activities of Canon. Further assistance in identifying the records held by Canon is obtainable from the Information Officer. Records to which access will be provided in accordance with the PAIA (subject to the restrictions and right of refusal to access provided for in the PAIA) are available in respect of the following (non-exhaustive) aspects of the Canon South Africa's business and its operations:

Department / Business Unit	Record Types
Sales & Marketing	<ul style="list-style-type: none"> → Market Information
	<ul style="list-style-type: none"> → Product Brochures → Marketing and Product Strategies → Product Sales Records → Customer Information and Customer Database → New business development → General correspondence
Finance	<ul style="list-style-type: none"> → Accounting records
	<ul style="list-style-type: none"> → Annual financial statements → Banking records → Business contracts → Credit bureau records → General correspondence → Internal control reports → Invoices, credit notes, statements etc → Management accounts → Property leases → Proposal and tender documents → SA Reserve Bank returns and correspondence → Statistics SA returns and correspondence → Statutory records → Tax returns and SARS correspondence → General correspondence
Human Resources	<ul style="list-style-type: none"> → Bargaining Council records and correspondence

	→ BEE statistics, certificates and audit reports
	→ Employment Equity reports
	→ Leave records

	→ Letters of employment
	→ Medical aid records
	→ Payroll records
	→ Personnel files and records
	→ Policies and procedures
	→ Retirement benefit records
	→ SDL records and returns
	→ SETA records and correspondence
	→ Staff attendance records
	→ Traineeship contracts
	→ Training material
	→ Training statistics
	→ UIF records and returns
	→ Workman's Compensation records
	→ General correspondence
Health & Safety	→ Contracts and Agreements
	→ General Correspondence
	→ Minutes of Meetings
	→ Appointment Records
	→ General correspondence
Corporate Communications	→ Customer complaints/queries
	→ Customer liaison
	→ Compliment records
	→ General correspondence
	→ Customer complaints/queries
	→ Communication Plans & Templates
	→ Media publications
Information Technology	→ Social media content
	→ Contracts and Agreements
	→ Operational Records
	→ Equipment Records
	→ Policy Records
	→ General correspondence
Corporate governance	→ Executive Committee minutes and records
	→ Codes of conduct
	→ Corporate Social Investment records
	→ Directors' minutes and records
	→ Legal compliance
	→ Policies and procedures
	→ Risk management reports
	→ Shareholder agreements

	→ Executive Committee minutes and records
	→ Codes of conduct
	→ Corporate Social Investment records
	→ General correspondence
Business Operations	→ Contracts and agreements
	→ General correspondence
	→ Health and safety records
	→ Import and export records
	→ Insurance records and correspondence
	→ Quality control records
	→ Service level agreements
	→ Telephone and communication records
Services and Support	→ Contracts and agreements
	→ Call centre content
	→ Operational records
	→ Equipment records
	→ Procedural records
	→ General correspondence

7. Information available in terms of POPIA

7.1 Purpose of processing of personal information

The purpose for which personal information is processed by the Canon will depend on the nature of the information. In general, personal information is processed by Canon for business administration purposes, including but not limited to:

- provide our goods or supply our services
- better understand our data subjects' needs when doing so
- keep our data subject records up to date
- manage employees in general
- manage supplier contracts in general
- manage dealer relationships in general
- manage customers in general
- manage customer credit in general
- market to customers in various countries
- enforce debts
- market goods and services to prospects
- to engage with investors and the media

→ process customer requests or complaints; and

- process personal information of employees for forensic purposes.
- to protect the legitimate interests of the data subjects; or
- where it is necessary for pursuing the legitimate interests of the Companies.
- to comply with obligations imposed by law.

8. Categories of personal information collected by Canon South Africa Pty Ltd

Categories of Data Subjects and Information – Section 51(1)(C)(II)

8.1 Categories of Data Subjects

- Personnel / employees
- Consultants
- Contractors
- Customers
- Investors
- Service providers
- Suppliers
- Other third parties with whom the Canon conduct business.

8.2 Categories of Personal Information

We process many different categories of personal information, including:

- contact details, such as phone numbers, physical and postal addresses, and email addresses
- personal details, such as names and ages
- demographic details, such as races and age groups
- health information
- biometric information
- account numbers
- background information
- contract information
- credit information
- market intelligence information; and
- debt and debtor information.

8.3 Categories of recipients to whom personal information may be supplied

We give the following people personal information that we process in the ordinary course of business to fulfil our obligations to our customers or clients:

- Statutory authorities
- Law enforcement
- Tax authorities
- Financial institutions
- Medical schemes
- Employee pension and provident funds
- Industry bodies
- contractors, vendors, or suppliers
- agents, distributors, or other resellers
- operators, other responsible parties, or co-responsible parties; and
- third party vendors (such as software developers) to help us maintain our services

9. Transborder flows of personal information

Planned transborder flows of personal information – Section 51 (1) (C) (V)

Canon envisage that we may transfer personal information to third parties or other companies in the group, who are situated in a foreign country and such transfers would be subject to the relevant provisions of the POPI Act.

10. Request Process

→ **POPIA** provides that a data subject may, upon proof of identity, request Canon South Africa Pty Ltd to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.

→ **POPIA** provides that a data subject may object, at any time, to the processing of personal information by Canon South Africa Pty Ltd, on reasonable grounds relating to his/her situation, unless legislation provides for such processing.

→ **A data subject** may also request Canon South Africa Pty Ltd to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a

record of personal information about the data subject that Canon South Africa Pty Ltd is no longer authorised to retain in terms of POPIA's retention and restriction of records provisions.

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

Officer.

11. 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.

12. 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)