COCHRANE STEEL PRODUCTS PROPRIETARY LIMITED

(“COCHRANE”)

(A PRIVATE BODY)

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 IN RESPECT OF COCHRANE

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1 INTRODUCTION AND APPLICATION

1.1 This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("**PAIA**") which gives effect to the constitutional right of access to any information in records held by public or private bodies that is required for the exercise or protection of any rights. PAIA sets out the requisite procedural issues attached to such request and the requirements which such request must met with regards to the grounds for refusal or partial refusal of such requests.

1.2 The aim of the Manual is to assist potential Requesters to request access to information (documents, records and/or Personal Information) from Cochrane as contemplated under PAIA and is useful for the public to -

1.2.1 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;

1.2.2 know the description of the records of the body which are available in accordance with any other legislation;

1.2.3 access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;

1.2.4 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

1.2.5 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;

1.2.6 know the description of the categories of data subjects and of the information or categories of information relating thereto;

1.2.7 know the recipients or categories of recipients to whom the Personal Information may be supplied;

1.2.8 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

1.2.9 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be Processed.

1.3 The Manual may be amended from time to time and as soon as any amendments have been affected, the latest version of the Manual will be published and distributed in accordance with PAIA.

1.4 A Requester is invited to contact the Information Officer should he or she require any assistance in respect of the use or content of this Manual.

1.5 The definitions provided in this Manual are solely for the purpose of this Manual and arenot to be taken as applicable to PAIA.

2 DEFINITIONS

The following words or expressions will bear the following meanings in this Manual –

2.1 "**Affiliates**" means any company or other entity operating in foreign markets and that is controlled by or under common control with Cochrane, where 'control' means the possession, directly or indirectly, of the power to direct the management and policies of an entity;

2.2 "**Associated Companies**" means any separate company or other entity operating in foreign markets that is associated with Cochrane, that is not controlled by or under common control with Cochrane, where 'control' means the possession, directly or indirectly, of the power to direct the management and policies of an entity;

2.3 "**Cochrane**" means for purposes of this manual CSP and any of the Affiliates, which trade collectively under the entity, CSP;

2.4 "**CSP**" means Cochrane Steel Products Proprietary Limited, a private body registered under South African law, with registration number 1973/006991/07;

2.5 "**Customer**" means a natural or juristic person who or which receives services and/or products from Cochrane;

2.6 "**Data Subject**" means the natural or juristic person to whom Personal Information relates;

2.7 "**Employee**" means any person who works for, or provides services to, or on behalf of Cochrane, and receives or is entitled to receive remuneration;

2.8 "**Information Officer**" means Cochrane's designated information officer described in paragraph 6 of this Manual;

2.9 "**Information Regulator**" shall bear the meaning ascribed thereto in POPIA;

2.10 "**Manual**" means this manual, together with any annexures thereto as amended and made available on the website of Cochrane at https://www.cochraneglobal.com/ and at the offices of Cochrane from time to time;

2.11 "**PAIA**" means the Promotion of Access to Information Act No. 2 of 2000, together withany regulations published thereunder;

2.12 "**POPIA**" means the Protection of Personal Information Act No. 4 of 2013, together withany regulations published thereunder;

2.13 "**Personal Information**" has the meaning ascribed thereto under POPIA;

2.14 "**Processing**" means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –

2.14.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

2.14.2 dissemination by means of transmission, distribution or making available in any otherform by electronic communications or other means; or

2.14.3 merging, linking, blocking, degradation, erasure or destruction. For the purposes ofthis definition, "**Process**" has a corresponding meaning;

2.15 "**Requester**" means any person or entity (including any Data Subject) requesting access to a record that is under the control of Cochrane; and

2.16 "**Third Party**" means any independent contractor, agent, consultant, sub-contractor or other representative of Cochrane.

3 HOW TO USE PAIA TO ACCESS INFORMATION

(Information provided in terms of section 51(1) of PAIA)

3.1 PAIA 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 ofPAIA, the public body must be acting in the public interest.

3.2 Requests in terms of PAIA shall be made in accordance with the prescribed procedures,and at the prescribed fees as set out in paragraph 9 hereto.

3.3 The Information Regulator has, in terms of section 10(1) of PAIA, made available a guide on how to use PAIA (the "**Guide"**). The Guide can be obtained from the Information Regulator's website (accessible here (requesting from the information officer) and here (requesting from the Information Regulator)) or upon request to Cochrane's Information Officer using the prescribed forms. You may also direct any queries to:

The Information Regulator of South Africa

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

E - mail: mailto:enquiries@inforegulator.org.za / PAIAComplaints@inforegulator.org.za

Website: https://inforegulator.org.za/

Tel: 010 023 5200

Fax: 086 500 3351

3.4 The Guide contains the description of -

3.4.1 the objects of PAIA and POPIA;

3.4.2 the postal and street address, phone and fax number and, if available, electronic mail address of

3.4.2.1 the information officer of every public body; and

3.4.2.2 every deputy information officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

3.4.3 the manner and form of a request for -

3.4.3.1 access to a record of a public body contemplated in section 11; and

3.4.3.2 access to a record of a private body contemplated in section 50;

3.4.3.3 the assistance available from the information officer of a public body in terms of PAIA and POPIA;

3.4.3.4 the assistance available from the Information Regulator in terms of PAIA and POPIA;

3.4.3.5 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA;

3.4.3.6 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

3.4.3.7 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

3.4.3.8 the notices issued in terms of sections 22 and 4 regarding fees to be paid in relation to requests for access; and

3.4.3.9 the regulations made in terms of section 92.

4 OVERVIEW OF THE STRUCTURE AND FUNCTIONS OF COCHRANE

4.1 Cochrane is incorporated and registered in the Republic of South Africa under registration number 1973/006991/07.

4.2 Cochrane is a manufacturer that supplies and installs security perimeter barriers products (i.e. ClearVu) and provides engineering services.

5 COCHRANE'S CONTACT DETAILS

(Information required under section 51(1)(a) of PAIA)

Name of Body:	Cochrane Steel Products Proprietary Limited

Physical & Postal Addresses:	125 Fitter Road, Spartan, Kempton Park, Johannesburg, Gauteng, 1619
Email address:	info@cochraneglobal.com
Telephone number:	011 593 0400
Website address:	https://www.cochraneglobal.com/
Head of Body	**Name:** Richard Bruce Cochrane **T:** 011 593 0400 **E:** compliance@cochraneglobal.com / bcochrane@cochraneglobal.com
Information Officer	**Name**: Jennifer Leigh Cochrane **T:** 011 593 0400 **E:** compliance@cochraneglobal.com

6 COCHRANE'S PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

(Information required under section 51(1)(c) of PAIA)

6.1 Purpose of Cochrane's Processing of Personal Information

6.1.1 Cochrane will Process Personal Information only in ways that are for, or compatible with,the business purposes for which the data was collected or that are subsequently authorised by the relevant Data Subject.

6.1.2 Cochrane will retain Personal Information only for as long as is necessary to accomplishCochrane's legitimate business purposes or for as long as may be permitted or requiredby applicable law.

6.1.3 We use the Personal Information we collect to operate and manage its operations as manufacturer of high-security perimeter barriers products (i.e. ClearVu) and related engineering services, including to serve our customers and market and promote our products and services. Some examples include –

6.1.3.1 Cochrane may Process Personal Information of its current and potential clients/customers, and its Employees, Third Parties, Associated Companies, and/or Affiliates;

6.1.3.2 Cochrane may Process Personal Information of its suppliers and service providers and its Employees, Third Parties, Associated Companies, and/or Affiliates; and

6.1.3.3 Cochrane may furthermore Process Personal Information of its own current and potential employees and any third party that it engages with or Personal Information that it is legally or commercially required to Process;

6.1.4 Cochrane will use the Personal Information it collects in the following ways -

6.1.4.1 to establish and manage business or customer relationship and provide customer service and support, including responding to inquiries, processing orders and transactions and delivering products and services;

6.1.4.2 for providing the services and products as per customer requests including to manage or fulfil contracts and orders (e.g. the sale, design, installation, delivery, execution of our products and services), and to provide product/service-related information;

6.1.4.3 in connection with the execution of payment processing functions, including payment of suppliers'/service providers' invoices;

6.1.4.4 for purposes of preventing, discovering and investigating non-compliance with any internal Cochrane policies or procedures which may be updated or implemented from time to time;

6.1.4.5 for the purposes of investigating fraud, or other related matters;

6.1.4.6 for employment-related purposes such as recruitment, administering payroll and carrying out background checks;

6.1.4.7 in connection with internal audit purposes (i.e. ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);

6.1.4.8 in connection with external audit purposes;

6.1.4.9 to respond to any correspondence that a Cochrane customer may send to Cochrane, including via email or by telephone;

6.1.4.10 to facilitate and process an application by a Data Subject to become a customer;

6.1.4.11 in order to address customer or end-consumer complaints in respect of Cochrane's products and services;

6.1.4.12 to contact the Data Subject from time to time, where specific consent has been given to follow-up contacts by Cochrane or to be put on Cochrane's mailing list;

6.1.4.13 in order to receive and address inquiries or complaints in respect of Cochrane's operations;

6.1.4.14 to analyse and better understand Cochrane' customers business needs and to improve the delivery and provision of products and services, including customer services;

6.1.4.15 for such other purposes to which the Data Subject may consent from time to time;

6.1.4.16 to comply with applicable legal obligations imposed on Cochrane; and

6.1.4.17 for such other purposes as authorised and in compliance with the applicable law.

6.2 Cochrane will not use the Personal Information which we collect for any purposes other than those purposes specified in paragraph 6.1 above.

6.3 **Categories of Data Subjects and of the Personal Information relating thereto**

6.3.1 Cochrane collects Personal Information directly from the Data Subject and/or from Third Parties and Associated, and where Cochrane obtains Personal Information from Third Parties and Associated Companies, Cochrane will ensure that it obtains the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where Cochrane is permitted to do so in terms of the applicable laws.

6.3.2 Data Subjects in respect of which Personal Information is Processed include -

6.3.2.1 Customers of Cochrane;

6.3.2.2 Supplier appointed by Cochrane;

6.3.2.3 Partners, distributors and resellers;

6.3.2.4 Affiliates and Associated Companies;

6.3.2.5 Employees and/or personnel;

6.3.2.6 Website visitors;

6.3.2.7 Beneficiaries of employees (including children);

6.3.2.8 Directors; and

6.3.2.9 New job applicants.

6.3.3 Examples of Third Parties from whom Personal Information is collected include: our Customers when Cochrane handles Personal Information on their behalf; regulatory bodies; employees; potential employees; customers and suppliers and their employees, representatives and/or affiliate third parties; other companies providing services to Cochrane and where Cochrane makes use of publicly available sources of information.

6.4 The Personal Information relating thereto is as follows:

DATA SUBJECTS	PERSONAL INFORMATION
Employees	• Name and Surname • identity number/social security number/passport numbers (if individuals) • Contact details • Physical and postal address • Date of birth • Age • Disability • Information • Employment history • Criminal/background checks • Education history • Banking details • Income tax reference number • Remuneration and benefits information (including medical aid, pension/provident fund information) • Disciplinary procedures • Employee disability information • Employee performance records • Physical access records • CCTV records • Health and safety records • Time and attendance records
Suppliers/Service Providers/Third Parties / Affiliates / Associated Companies	• Entity name • Registration number • Income tax number • Contact details for representative persons • FICA documentation • BBB-EE certificates • Invoices • Bank Account and Payment details • Contractual documentation
Directors	• Name, Surname, ID numbers, financial information as required for statutory reporting
New Job Applicants	• Name • Surname • Address • Contact details • Email address • Telephone number • Details of qualifications • Skills • Experiences and employment history • Information about an applicant's current level of remuneration, including benefit entitlements, whether or not they have a disability for which Cochrane needs to make reasonable adjustments during the recruitment process, and information about their entitlement to work in South Africa
Website Visitors	• Name

	• Email address • IP address
Visitors	• Physical access records • Electronic access records scans and CCTV records
Children	• Name • Birthday
Customers	• Name and Surname (if individuals) • Company name and registration number • Directors/ authorized representative details • Contact details for representative persons • identity number/social security number/passport numbers (if individuals) • Contact details • Physical and postal address • Tax reference number • FICA documentation

6.5 Recipients or categories of recipients to whom Personal Information may be supplied:

6.5.1 Cochrane may be required to disclose Personal Information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any Court or Tribunal. We may disclose Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of Cochrane, our Customers, or others.

6.5.2 Cochrane will comply with POPIA before transferring Personal Information to a Third Party who is a contractor of Cochrane, Associated Companies and/or Affiliates. Before transferring Personal Information to a Third Party contractor, such as an authorised service provider, Cochrane will obtain assurances from the Third Party that it will Process Personal Information in a mannerconsistent with POPIA. Where Cochrane learns that a Third Party contractor, Associated Companies and/or Affiliates is using ordisclosing Personal Information in a manner contrary to POPIA, Cochrane will take reasonable steps to prevent such use or disclosure.

6.5.3 We reserve the right to disclose and transfer a Data Subject's information, includingtheir Personal Information in connection with a corporate merger, consolidation, the sale of substantially all of our membership interests and/or assets or other corporate change, including to any prospective purchasers.

6.5.4 We also provide some personal information to Third Parties to fulfil our contractual obligations, or for any other legal obligations we might have.

6.5.5 Other categories of persons include:

6.5.5.1 brokers, advisors, consultants, intermediaries and other administrators

6.5.5.2 retirement funds and their trustees and principal officers;

6.5.5.3 medical aid companies;

6.5.5.4 insurers;

6.5.5.5 recruitment organisations may collect personal information on our behalf;

6.5.5.6 regulators and law enforcement agencies'; and

6.5.5.7 the South African Revenue Service.

6.6 **Planned Transborder Flows of Personal Information**

6.6.1 Cochrane may send Personal Information to a foreign jurisdiction outside of South Africa, including for Processing and storage by Third Parties, Affiliates, Associated Companies.

6.6.2 When Personal Information is transferred to a jurisdiction outside of the Republic of South Africa including to any cloud, data centre or server located outside of South Africa, Cochrane will obtain the necessary consent to transfer the Personal Information to such foreign jurisdiction or may transfer the Personal Information where Cochrane is permitted to do so in accordance with the provisions applicable to cross-border flows of Personal Information under POPIA.

6.7 **Information Security Measures**

6.7.1 The security and confidentiality of Personal Information is important to Cochrane. We have implemented reasonable technical, administrative, and physical security measures to protect Personal Information from unauthorised access or disclosure and improper use.

6.7.2 We are committed to ensuring that our security measures which protect your Personal Information are continuously reviewed and updated where necessary.

6.7.3 In Processing any Personal Information, Cochrane shall comply with the following minimum technical and organisational security requirements –

6.7.3.1 **Physical Access** – Access to Personal Information is restricted in our offices andonly to those Employees who need the Personal Information to perform a specific job / task.

6.7.3.2 **Employee Training** – All Employees with access to Personal Information are kept up-to-date on our security and privacy practices. After a new policy is added,these Employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for the Personal Informationof all Data Subjects.

6.7.3.3 **Unique User Identification** – Employees each have a unique user ID assignedto them, subject to strict confidentiality undertakings in terms of Cochrane's password and confidentiality policy.

6.7.3.4 **Passwords** – Cochrane shall ensure that there are passwords required for any access to Personal Information in line with its password policy.

6.7.3.5 **Physical access and privileges** – Cochrane ensures that access to Personal Information is limited to Employees on a "need to know" basis, and Cochrane Employees are required to strictly utilise their unique user ID and applicable passwords to access same. The access to such Personal Information shall be subject to a two-step authorization/authentication process.

6.7.3.6 **Back-ups** – Cochrane ensures that all Personal Information is backed-up regularly,based on operational or legal requirements, and that back up testing is conductedregularly in order to ensure that Personal Information can be recovered in the event that such Personal Information is lost, damaged or destroyed.

6.7.3.7 **Malware protection** – Cochrane ensures that its environment has comprehensive malware protection software employed, which software

is specifically designed to protect Cochrane from the most recent malware infections.

6.7.3.8 **Vulnerability scanning** – Cochrane frequently conducts vulnerability scanning in order to assess whether Personal Information is adequately protected from external threats.

6.7.3.9 **Network configuration** – Cochrane continuously monitors all designated networks, employs intrusion detection systems and/or intrusion prevention systems, and records any security incidents.

6.7.3.10 **Systems Review** – Cochrane conducts regular reviews of its technical and organisational security measure system in order to ensure that all of the above security measures are functioning effectively and applied consistently.

7 INFORMATION HELD BY COCHRANE IN TERMS OF PAIA

(Information required under section 51(1)(e) of PAIA)

7.1 This section of the Manual sets out the categories and descriptions of records held by Cochrane. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under PAIA. In particular, certain grounds of refusal as set out in PAIA may be applicable to a request for such records.

7.2 Company records

7.2.1 Company name documents

7.2.2 Company registration documents

7.2.3 Memorandum of Incorporation

7.2.4 Minutes of meetings

7.2.5 Licenses

7.2.6 Certification, professional qualifications and registration

7.3 Accounting records

7.3.1 Details of accounting officer or auditors

7.3.2 Formal books of account and financial statements

7.3.3 Source documents

7.3.4 Customs, excise and logistics

7.3.5 Banking records

7.3.6 Management reports

7.3.7 Company tax returns

7.4 **Customer records**

7.4.1 Financial Intelligence Centre Act 38 of 2001 onboarding (KYC) documents

7.4.2 Correspondence with customers

7.5 **Human Resources records**

7.5.1 Employee or staff records (including inter alia letters of appointment, performance appraisals, remuneration, leave register, disciplinary warnings)

7.5.2 Employment contracts

7.5.3 Employee policies and procedures

7.5.4 Employment equity plan and correspondence with bargaining councils and Department of labour

7.5.5 Pension funds and records

7.5.6 Recruitment

7.5.7 Health and safety documentation

7.5.8 Training / learning and development records

7.5.9 Medical aid records

7.5.10 Skills development plan

7.5.11 Organisational structure

7.6 **Operations records**

7.6.1 Specifications

7.6.2 Technical designs and drawings

7.6.3 Procedures

7.6.4 Plans

7.6.5 Stock records

7.6.6 Asset register

7.6.7 Corporate social investment / charity / BEE work done.

7.7 **Marketing**

7.7.1 Website/s

7.7.2 Marketing materials and brochures

7.8 **Third Party records**

Cochrane may possess records pertaining to third parties, including without limitation, Associated Companies, Affiliates, service providers, contactors, and/or suppliers. Alternatively, such other parties may possess records that can be said to belong to Cochrane where required in terms of the applicable law and/or practical necessity. Any such records held by a Third Party, Associated Companies and//or Affiliates on behalf of or in conjunction with Cochrane will be governed by appropriate agreements and service levels that ensure the Third Party, Associated Companies and//or Affiliates provide the same and/or similar protection and security to such records in their possession.

8 INFORMATION KEPT BY COCHRANE IN ACCORDANCE WITH OTHER LEGISLATION

(Information required under section 51(1)(b)(iii) of PAIA)

8.1 Records are kept in accordance with legislation applicable to Cochrane, which includes butis not limited to, the following:

8.1.1 Basic Conditions of Employment Act 75 of 1997

8.1.2 Companies Act 71 of 2008

8.1.3 Compensation for Occupational Injuries and Diseases Act 130 of 1993

8.1.4 Competition Act 89 of 1998

8.1.5 Constitution of the Republic of South Africa, 1996

8.1.6 Consumer Protection Act 68 of 2008

8.1.7 Debt Collectors Act 114 of 1998

8.1.8 Electronic Communications and Transactions Act 25 of 2002

8.1.9 Employment Equity Act 55 of 1998

8.1.10 Financial Intelligence Centre Act 38 of 2001

8.1.11 Independent Communications Authority of South Africa Act 13 of 2000

8.1.12 Income Tax Act 58 of 1962 (Section 75)

8.1.13 Insolvency Act 24 of 1936

8.1.14 Labour Relations Act 66 of 1995

8.1.15 National Credit Act 34 of 2005

8.1.16 Occupational Health and Safety Act 85 of 1993

8.1.17 Promotion of Access to Information Act 2 of 2000

8.1.18 Pension Funds Act 24 of 1956

8.1.19 Protection of Personal Information Act 4 of 2013

8.1.20 Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002

8.1.21 Skills Development Act 97 of 1998

8.1.22 Tax Administration Act 28 of 2011

8.1.23 Tax on Retirement Funds Act 38 of 1996

8.1.24 Trademarks Act 194 of 1993

8.1.25 Unemployment Insurance Contributions Act 4 of 2002

8.1.26 Unemployment Insurance Act 63 of 2001

8.1.27 Value Added Tax Act 89 of 1991

8.2 Records kept in terms of the above legislation may, in certain instances (and insofar asthe information contained therein is of a public nature) be available for inspection without a person having to request access thereto in terms of PAIA.

9 REQUEST PROCEDURES

9.1 Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA. The following procedural requirements serve as a guideline for requestors and the requestor must comply with all these procedural requirements.

9.2 Form of request

9.2.1 The Requester must use the prescribed form to make the request for access to a record, which form may be downloaded from the Information Regulator's website and accessible here. This must be made to the Information Officer at the address or electronic mail address of the body concerned(*see s 53(1) of PAIA*).

9.2.2 The Requester must provide sufficient detail on the request form to enable the Information Officer to identify the record, the Requester, the form of access required if the request is granted and the postal or email address of the Requestor. The Requester should also indicate which form of access is required and specify a postal address, fax number in the Republic or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the

necessary particulars to be so informed (*see s 53(2)(a) and (b) and (c)and (e) of PAIA*).

9.2.3 The Requester must identify the right that is sought to be exercised or protected andprovide an explanation of why the requested record is required for the exercise or protection of that right (s*ee s 53(2)(d) of PAIA*).

9.2.4 If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of the private body (*See s 53(2)(f) of PAIA*).

9.2.5 If the request is granted then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hoursto search and prepare the record for disclosure (*see s 54(6) of PAIA*).

9.3 **Fees**

9.3.1 Request fees:

9.3.1.1 The Information Officer must by notice require the Requester to pay the prescribed request fee (if any) before further processing the request (s*ee s 54(1)of PAIA*).

9.3.1.2 The fee that the Requester must pay to a private body is R140. The Requester may lodge an application to the court against the tender or payment of the requestfee (*See section 54(3)(b) of PAIA*).

9.3.2 Access fees and fees for reproduction:

9.3.2.1 If access to a record/s is granted by Cochrane, the Requester may be required to pay an access fee for the search for and preparation of the records and for re- production of the record/s.

9.3.2.2 The access fees which apply are set out below. Cochrane can refuse access until such access fees have been paid.

	Reproduction[1]	**Fee (Rand)**
1.	Photocopy of an A4-size page or part thereof provided in hardcopy or via scanned copy sent via email	R2.00 per page
2.	Printed copy of an A4-size page or part thereof held on acomputer or in electronic or machine readable form	R2.00 per page
3.	A copy of, in a computer readable form on: (i) Flash drive (to be provided by requestor) (ii) Compact disc a. If provided by requestor b. If provided to the requestor	 R40.00 R40.00 R60.00
4.	Transcription of visual images on an A4-size page or partthereof	Service to be outsourced. Will depend on quotation from service provider.
5.	Copy of visual images	
6.	Transcription of an audio record on an A4-size page	R24.00
7.	A copy of an audio record on: (iii) Flash drive (to be provided by requestor) (iv) Compact disc a. If provided by requestor b. If provided to the requestor	 R40.00 R40.00 R60.00
8.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00

[1] Updated in terms of Annexure B to the Regulations.

	To not exceed a total cost of	R435.00
9.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 1 to 7.
10.	Postage, e-mail or any other electronic transfer	Actual expense, if any

9.4 **Decision on request**

9.4.1 The Information Officer shall, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reason (if required) to that effect utilising the prescribed form on the Information Regulator's website and accessible here to respond to a request for access.

9.4.2 The 30 day period within which Cochrane has to decide whether to grant or refuse the request may be extended for a further period, no more than 30 days if the request is for a large amount of information, or the request requires a search for information held at another office (if applicable) of Cochrane and the information cannot reasonably be obtained within the original 30 day period. The Information Officer will notify the Requestor in writing should an extension be sought.

10 **TIMELINES FOR CONSIDERATION OF A REQUEST**

10.1 Requests for access by a Requestor will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30- day time limit is necessary. Such considerations include –

10.1.1 where the request is for a large number of records or requires a search through a large number of records (including where records that have been archived electronically need to be restored);

10.1.2 where the request requires a search for records in, or collection of such records from, an office of Cochrane located far away from Johannesburg;

10.1.3 consultation among divisions of Cochrane or with another private body is necessary ordesirable to decide upon the request that cannot reasonably be completed within theoriginal 30-day period;

10.1.4 more than one of the circumstances contemplated in paragraphs 11.1.1, 11.1.2 and11.1.3, exist in respect of the request making compliance with the original period notreasonably possible; or

10.1.5 the Requester consents in writing to such extension.

10.2 If an extension is necessary, you will be notified with reasons for the extension. If the Information Officer fails to communicate a decision on a request, such a request is thendeemed to have been refused.

11 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

11.1 Requests for access by a Requestor **must** be refused by the Information Officer if -

11.1.1 the disclosure would involve the unreasonable disclosure of Personal Information about a third party (natural person), including a deceased individual (see section 63of PAIA);

11.1.2 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 partythe 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 PAIA);

11.1.3 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 PAIA);

11.1.4 the disclosure could reasonably be expected to endanger the life or physical safety of an individual (see section 66(a) of PAIA);

11.1.5 the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege (see section 67 of PAIA); or

11.1.6 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 thirdparty; (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 section69 of PAIA).

11.2 Requests for access by a Requestor may be refused by the Information Officer if –

11.2.1 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 accordancewith 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));

11.2.2 the record:

(a) contains trade secrets of Cochrane;

(b) 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 Cochrane;

(c) contains information, the disclosure of which could reasonably be expected:

(i) to put Cochrane at a disadvantage in contractual or other negotiations; or

(ii) to prejudice Cochrane in commercial competition; or

(d) is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by Cochrane, except

insofar as it is required to give access to a record to which access is granted in terms of PAIA; or

11.2.3 the record contains information about research being or to be carried out by or on behalf of Cochrane, the disclosure of which would be likely to expose: (a) Cochrane; (b) aperson that is or will be carrying out the research on behalf of Cochrane; or (c) the subject matter of the research, to serious disadvantage.

12 REMEDIES AVAILABLE TO A REQUESTOR ON REFUSAL OF ACCESS

12.1 Internal remedies

12.1.1 Cochrane does not have any internal appeal procedures that may be followed once arequest to access information has been refused.

12.1.2 As such, the decision of the Information Officer is final.

12.2 External remedies

12.2.1 If you are not satisfied with the outcome of your request, you are entitled to lodge a complaint to the Information Regulator, subject to the provisions of PAIA.

12.2.2 Subject to the provisions of PAIA, a Requestor who is dissatisfied with an Information Officer's refusal to disclose information, may within 180 days after exhausting the Information Regulator's complaint procedure, apply to a Court of competent jurisdiction for relief.

12.2.3 Likewise, a third party dissatisfied with an Information Officer's decision to grant a request for information, may within 180 days after exhausting the Information Regulator's complaint procedure, apply to a Court of competent jurisdiction for relief.

13 OTHER INFORMATION HELD BY COCHRANE AS PRESCRIBED

(Other information as may be prescribed under section 51(1)(a)(ii))

The Minister of Justice and Constitutional Development has to date not made any regulations regarding disclosure of other information.

14 AVAILABILITY OF THE MANUAL

(Availability of Manual under section 51(3))

14.1 This Manual is available for inspection by the general public upon request, during officehours and free of charge, at the offices of Cochrane. Copies of the Manual may be made,subject to the prescribed fees.

14.2 The Manual is also posted on Cochrane's website: https://www.cochraneglobal.com/

15 PRESCRIBED FORMS AND FEE STRUCTURE

(Prescribed forms and fee structure in respect of private bodies)

The forms and fee structure prescribed under PAIA are available from the PAIA Guides found on the Information Regulator's website:
https://inforegulator.org.za/paia-guidelines/ and
https://inforegulator.org.za/paia-forms/