



ALUMICO BEATS (PTY) LTD

2025/588386/07

("The Company" or "Alumico Beats")

THE PROMOTION OF ACCESS TO INFORMATION MANUAL

("PAIA Manual")

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1. PREAMBLE

The Promotion of Access to Information Act, 2000 ("PAIA") came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights, and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.

Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such a private body and stipulates the minimum requirements that the manual has to comply with.

This Manual constitutes Alumico Beats' PAIA manual. This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"), which gives effect to everyone's Constitutional right to privacy. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

2. ABOUT ALUMICO BEATS

Alumico Beats (Pty) Ltd (Registration number 2025/588386/07)

Website: www.alumicobeats.co.za

3. CONTACT DETAILS

Name of Private Body: Alumico Beats (Pty) Ltd.

Designated Information Officer: The Information Officer

Email address of Information Officer: info@alumicobeats.co.za

Telephone number: 073 918 5444

Postal address: 6 Salix Terrace Street, Edleen, Kempton Park, 1619

Street address: 6 Salix Terrace Street, Edleen, Kempton Park, 1619

4. INFORMATION REGULATORS GUIDE

An official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from the Information Regulator free of charge. Any request for public inspection of the Guide at the office of the Information Officer or a request for a copy of the Guide from the Information Officer must substantially correspond with Form 1 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations.

5. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

- to provide a list of all records held by the legal entity;
- to set out the requirements regarding who may request information in terms of PAIA as well as the grounds on which a request may be denied;
- to define the manner and form in which a request for information must be submitted; and

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- to comply with the additional requirements imposed by POPIA

6. ENTRY POINT FOR REQUESTS

PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.

Information will therefore not be furnished unless a person provides sufficient particulars to enable Alumico Beats to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.

The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, to ensure proper compliance with PAIA and POPIA.

The Information Officer will facilitate the liaison with the internal legal team on all these requests.

All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 3 above.

7. AUTOMATICALLY AVAILABLE INFORMATION

Information that is obtainable via the Alumico Beats website about Alumico Beats 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:

- brochures
- press releases
- publication; and
- various other marketing and promotional material.

8. INFORMATION AVAILABLE IN TERMS OF POPIA

In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which data is processed by Alumico Beats will depend on the nature of the data and the data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

8.1. Categories of data subjects and personal information collected by Alumico Beats

8.2. Employees

- Currently Alumico Beats have no Full-Time employees and therefore do not have any employee records being kept.

8.2.1. Customers and or Consumers

- Postal and or Street Address
- Title and Name
- Contact numbers and or e-mail address
- Sales and or services rendered and related billing data

8.2.2. Vendors, Suppliers and other Businesses

- Name and Contact details
- Identity and or company information
- Banking and financial information
- Information about products or services
- Other information not specified and reasonably required to be processed for business operations.

8.3. The purpose of processing personal information

8.3.1. For Employees

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- Not currently applicable.
- 8.3.2. For Customers and or Consumers
- Performing duties in terms of any agreement with consumers
 - Operate and manage consumers' invoices and manage any agreement or correspondence consumers may have with Alumico Beats
 - Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about Alumico Beats products and services, unless consumers indicate otherwise
 - Carrying out market research, business and statistical analysis
 - Recovering any debt consumers may owe Alumico Beats
 - Complying with the Alumico Beats' regulatory and other obligations
 - Any other reasonably required purpose relating to Alumico Beats' business
- 8.3.3. For Vendors, Suppliers and other Businesses
- Verifying information and performing checks
 - Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties
 - Payment of invoices
 - Complying with the Alumico Beats' regulatory and other obligations
 - Any other reasonably required purpose relating to Alumico Beats' business
- 8.4. The recipients or categories of recipients to whom the personal information may be supplied
- Any firm, organisation or person that Alumico Beats uses to collect payments and recover debts or to provide a service on its behalf;
 - Any firm, organisation or person that/who provides Alumico Beats with products or services;
 - Any person who Alumico Beats reasonably believe to be a data subject's/consumer's parent, carer or helper where he/she is unable to handle his/her own affairs because of mental incapacity or other similar issues;
 - Any payment system Alumico Beats uses;
 - Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where Alumico Beats has a duty to share information;
 - Credit bureaux;
 - Financial institutions from whom payments are received on behalf of data subjects;
 - Any other operator not specified;
 - Employees (currently not applicable), contractors and temporary staff; and
 - Agents.
- 8.5. Planned transborder flows of personal information
- Storing information electronically; and
 - Making use of third-party service providers to fulfil a business function on behalf of Alumico Beats.
- 8.6. General description of information security measures to be implemented by Alumico Beats.
- Alumico Beats takes extensive information security measures to ensure the security, confidentiality, integrity and availability of personal information in our possession. This is supported by appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

9. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Information is available in terms of certain provisions of the following legislation, in as far it is applicable to the persons or entities specified in such legislation:

- Administration of Estates Act 66 of 1965
- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Close Corporations Act 69 of 1984

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- Companies Act 61 of 1973
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1978
- Debt Collectors Act 114 of 1998
- Electronic Communications and Transactions Act 25 of 2002
- Electronic Communications Act, 36 of 2005
- Employment Equity Act 55 of 1998
- Financial Advisory and Intermediary Services Act 37 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Insolvency Act No. 24 of 1936
- Labour Relations Act 66 of 1995
- Merchandise Marks Act 17 of 1941
- National Credit Act 34 of 2005
- Occupational Health & Safety Act 85 of 1993
- Pension Funds Act 24 of 1956
- Prevention of Organised Crime Act 121 of 1998
- Prevention and Combating of Corrupt Activities Act 12 of 2004
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protected Disclosures Act 26 of 2000
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Stamp Duties Act 77 of 1968
- Stock Exchanges Control Act 1 of 1985 (and the rules and listing requirements of the JSE Securities Exchange authorised in terms thereof)
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 30 of 1966
- Value Added Tax Act 89 of 1991
- Such other legislation as may from time to time be applicable

10. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST

Alumico Beats maintains records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

Please note further that many of the records held by Alumico Beats are those of third parties, such as clients and employees, and Alumico Beats takes the protection of third-party confidential information very seriously. Where Alumico Beats acts as professional advisors to clients, many of the records held are confidential and others are the property of the client and not of Alumico Beats. For further information on the grounds of refusal of access to a record please see paragraph 11.5 below. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

10.1. Internal Records

- Memoranda and Articles of Association
- Financial records
- Operational records
- Intellectual property
- Marketing records
- Internal correspondence
- Service records
- Statutory records

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- Internal policies and procedures
- Minutes of meetings

10.2. Personnel Records

- Currently not Applicable

10.3. Client-related records

- Contracts with the client

10.4. Other third-party records

Records are kept in respect of other parties, including without limitation joint ventures and consortia to which Alumico Beats is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to Alumico Beats.

11. REQUEST PROCEDURE

11.1. Completion of the prescribed form

- 11.1.1. Any request for access to a record in terms of PAIA must substantially correspond with Form 2 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations and should be specific in terms of the record requested.
- 11.1.2. A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.
- 11.1.3. POPIA provides that a data subject may, upon proof of identity, request Alumico Beats 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.
- 11.1.4. POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, Alumico Beats must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.
- 11.1.5. Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.
- 11.1.6. POPIA provides that a data subject may object, at any time, to the processing of personal information by Alumico Beats, on reasonable grounds relating to his/her situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as Annexure E and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.
- 11.1.7. A data subject may also request Alumico Beats 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 Alumico Beats is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- 11.1.8. A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, electronic mail address set out above.

11.2. Proof of identity

Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity

11.3. Payment of the prescribed fees

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- 11.3.1. There are two categories of fees which are payable:
- The request fee: R140.00.
 - The access fee: This is calculated by considering reproduction costs, search and preparation costs, as well as postal costs. These fees are determined on a case-to-case basis.
- 11.3.2. Section 54 of PAIA entitles Alumico Beats to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Annexure B of Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations.
- 11.3.3. When a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.
- 11.4. Timelines for consideration of a request for access.
- 11.4.1. Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.
- 11.4.2. The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations.
- 11.4.3. Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.
- 11.5. Grounds for refusal of access and protection of information.
- 11.5.1. There are various grounds upon which a request for access to a record may be refused. These grounds include:
- the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
 - the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
 - if disclosure would result in the breach of a duty of confidence owed to a third party;
 - if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
 - if the record was produced during legal proceedings, unless that legal privilege has been waived;
 - if the record contains trade secrets, financial or sensitive information or any information that would put Alumico Beats (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
 - if the record contains information about research being carried out or about to be carried out on behalf of a third party or by Alumico Beats.
- 11.5.2. Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.
- 11.5.3. If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the record.

12. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS

If the Information Officer decides to grant you access to the record, such access must be granted within 30 (thirty) days of being informed of the decision.

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There is no internal appeal procedure that may be followed once a request to access information has been refused. The decision made by the Information Officer is final. If you are not satisfied with the outcome of the request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

13. AVAILABILITY OF THIS MANUAL

Copies of this Manual are available for inspection, free of charge, at the offices of Alumico Beats and at www.alumicobeats.co.za.

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