APOSTROPHE HOLDINGS (PTY) LTD

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MANUAL

PAIA and POPIA Manual

Version 1.0 Adopted 20 October 2026 Next review October 2027 Owner: Information Officer

01 PURPOSE

This manual explains what records Apostrophe Holdings keeps, how it processes personal information, and how anyone can ask for access to its records.

It is published under section 51 of the Promotion of Access to Information Act, 2000 ("PAIA") and includes the information on personal information required by the Protection of Personal Information Act, 2013 ("POPIA"). Apostrophe Holdings (Pty) Ltd (registration number 2024/580066/07) is a private company providing independent strategic marketing consultancy services.

02 CONTACT DETAILS

Head of private body and Information Officer	Nazeer Suliman, Director (Information Regulator registration number 2026-069277)
Postal address	PO Box 1597, Houghton, 2041
Email	nazeers@apostropheholdings.com
Website	apostropheholdings.com

03 THE INFORMATION REGULATOR'S GUIDE

The Information Regulator publishes a guide on how to use PAIA and POPIA, including how to request records and how to complain. It is available in all official languages from the Regulator's website (inforegulator.org.za) and on request from the Information Regulator, Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg (postal: PO Box 31533, Braamfontein, Johannesburg 2017).

04 RECORDS AVAILABLE WITHOUT A REQUEST

The company's website content and published service information are available to anyone without a formal request. The company's Anti-Bribery and Corruption Policy and Code of Conduct and Sustainability Policy are available to clients and prospective clients on request.

05 RECORDS KEPT UNDER OTHER LAWS

The company keeps records as required by, among others: the Companies Act, 2008; the Income Tax Act, 1962; the Tax Administration Act, 2011; the Broad-Based Black Economic Empowerment Act, 2003; the Basic Conditions of Employment Act, 1997 and the Employment Equity Act, 1998 (if it employs staff); the Electronic Communications and Transactions Act, 2002; the Prevention and Combating of Corrupt Activities Act, 2004; POPIA; and PAIA.

06 SUBJECTS AND CATEGORIES OF RECORDS

SUBJECT	CATEGORIES OF RECORDS
Company and governance	Registration documents, memorandum of incorporation, director and shareholder records, statutory filings
Finance and tax	Accounting records, invoices, bank statements, tax returns and correspondence with SARS

Clients	Agreements, work orders, correspondence, deliverables and billing records. Most client records are confidential under contract.
Suppliers and associates	Agreements, invoices and correspondence
Compliance	Policies, registers (gifts, conflicts of interest, training), B-BBEE affidavit and supplier assessments
Staff (if employed)	Employment contracts, payroll and statutory employment records

07 PROCESSING OF PERSONAL INFORMATION

- **Purposes:** providing and invoicing consulting services; managing client, supplier and associate relationships; complying with legal, tax and contractual obligations; and responding to enquiries.
- **Data subjects and information:** client and prospective client contacts (names, roles, business contact details and correspondence); supplier and associate contacts (names, contact and banking details); website enquirers (names and contact details they provide); and staff, if employed (identity, contact, banking and employment details).
- **Recipients:** the company's tax consultant and auditors, banks, government bodies where the law requires, and service providers that host the company's email, documents and files.
- **Cross-border transfers:** the company's email, document and meeting services are hosted by established cloud providers, including Apple, Microsoft, Google, Docusign and Zoom, which may store information outside South Africa, including in the United States. These providers are bound by data protection terms and hold recognised security certifications such as ISO 27001.
- **Security measures:** information is accessed only by authorised persons, on encrypted devices with multi-factor authentication, and is held on ISO 27001-certified cloud platforms. Client information is returned or destroyed as each client contract requires.

08 HOW TO REQUEST ACCESS TO RECORDS

- Requests are made on the prescribed form (Form 2 of the PAIA Regulations, 2021), available from the Information Regulator's website, and sent to the Information Officer by email.
- The requester must give enough detail to identify the record, and state which right the record is needed to exercise or protect.
- Fees, where payable, are those prescribed in the PAIA Regulations. The requester is told of any fee before the request is processed.
- The company responds within 30 days. Access may be refused on the grounds set out in PAIA, for example to protect a third party's personal or confidential commercial information.
- Data subjects may also ask, under POPIA, whether the company holds their personal information and ask for it to be corrected or deleted.
- A requester who is unhappy with a decision may complain to the Information Regulator or apply to court.

09 AVAILABILITY AND REVIEW

This manual is available on the company's website, on request from the Information Officer, and to the Information Regulator on request. It is reviewed at least annually, and whenever the company's records or processing change materially.

Adopted on behalf of Apostrophe Holdings (Pty) Ltd.

Nazeer Suliman

FOUNDER & DIRECTOR, INFORMATION OFFICER

Apostrophe Holdings (Pty) Ltd

Date: 20 October 2026