



CLICKS GROUP
L I M I T E D

REG. NO. 1996/000645/06

THE CLICKS GROUP
Promotion Of Access to Information Act 2 Of
2000 Manual

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1. INTRODUCTION TO CLICKS GROUP LIMITED

The manual is to assist potential requesters as to the procedure to be followed when requesting access to information/documents from Clicks Group Limited (CGL) as contemplated in terms of the Act.

The manual may be amended from time to time and as soon as any amendments have been finalised the latest version of the manual will be made public.

Any requester is advised to contact our Information Officer(s) should he/she require any assistance in respect of the use of this manual and/or requesting of documents/information from Clicks Group Limited.

DEFINITIONS

The following words in this manual mean:

“Clicks Group Limited” and/or “CGL” shall mean Clicks Group Limited, a private body as defined in the Act which listed on the Johannesburg Stock Exchange, and its subsidiaries.

“the Act” shall mean the Promotion of Access to Information Act, No 2 of 2000, together with all relevant regulations.

“the/this manual” shall mean this manual together with all annexures thereto as available at the offices of Clicks Group Limited.

“Web Apps” shall mean the website and web applications that CGL operates in the course of carrying out its business.

The company is a holding company and is listed on The JSE Limited

It also administers the Clicks Group Retirement Fund, Clicks Group Negotiated Pension Fund and Clicks Group Negotiated Provident Fund.

2. PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

Contact details (in terms of Section 51(1)(a) of the Act)

Full Name	: Clicks Group Limited
Registration Number	: 1996/000645/06
Registered Address	: Cnr. Searle & Pontac Streets, Cape Town, 8001
Postal Address	: P.O. Box 5142, Cape Town, 8000
Telephone Number	: +27 (0)21 460 1911
Fax Number	: +27 (0)21 460 1805
Head/CEO	: Bertina Engelbrecht
Designated Information Officer	: Ross Forgan
Designated Deputy Information Officer	: Keri Hattingh
Email Address of Information Officer	: popia@clicksgroup.co.za
Website	: http://www.clicksgroup.co.za ; www.clicks.co.za

Name	Clicks Negotiated Provident Fund
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Registration number	12/8/25816
Name	Clicks Negotiated Pension Fund
Registration number	12/8/25815
Name	Clicks Group Retirement Fund
Registration number	12/8/9883/2
Information Officer:	Sunilduth Harilall
Street Address:	Cnr. Searle & Pontac Streets, Cape Town, 8001
Postal Address:	P.O. Box 5142, Cape Town, 8000
Telephone:	+27 (0)21 460 1911
Website:	+27 (0)21 460 1805
E-mail:	principalofficer@clicksgroup.co.za

The section 10 Guide on how to use the Act (in terms of Section 51(1)(b))

(Information required under Section 51(1)(b) of the Act)

A copy of the PAIA Manual is available here. Enquiries regarding the Guide can be addressed to the Information Regulator, the contact details of which are as follows:

Physical Address	: The Information Regulator (South Africa) JD House 27 Stiemens Street Braamfontein Johannesburg 2001
Postal Address	: P.O Box 31533 Braamfontein Johannesburg 2017
Website	: https://www.inforegulator.org.za/
E-mail	: POPIAComplaints@inforegulator.org.za

**3. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION
(IN TERMS OF SECTION 51(1)(D))**

Records are kept in accordance with the legislation as is applicable to Clicks Group Limited, which includes the following legislation (as amended) *The below list is not exhaustive:*

- Electronic Communications and Transactions Act 25 of 2002
- Protection of Personal Information Act 4 of 2013
- Financial Intelligence Centre Act 38 of 2001
- Consumer Protection Act 68 of 2008
- Pharmacy Act 53 of 1974 and related regulations
- Medicines and Related Substances Act 101 of 1965 and related regulations
- South African Revenue Services Act 34 of 1997
- Close Corporations Act, No. 69 of 1984
- Companies Act, No. 71 of 2008
- Income Tax Act, No. 58 of 1962
- Customs and Excise Act, No. 91 of 1964
- Basic Conditions of Employment Act, No. 75 of 1997

- Labour Relations Act, No. 66 of 1995
- Unemployment Insurance Act, No. 63 of 2001
- National Credit Act 34 of 2005
- Pensions Act 24 of 1956
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- Unemployment Insurance Act 63 of 2001
- Compensation, for Occupational Injuries and Diseases Act, No. 130 of 1993
- Occupational Health and Safety Act, No. 85 of 1993, and regulations
- Prescription Act, No. 68 of 1969
- Auditing Profession Act No. 26 of 2005
- Payment Card Industry Data Security Standards

*and any equivalent legislation (where applicable) in Namibia, Botswana, Eswatini and Lesotho.

4. Gaining access to records held by Clicks

Group Limited (in terms of Sections 51(1)(c) and 51(1)(e)).

4.1 What categories of records are, or will be, automatically available without you having to request access to these records in terms of the Act?

The Act provides for the automatic disclosure of certain records. Should your request relate to records that must be automatically disclosed in terms of the Act, then you will not have to formally request those records in terms of the Act.

In terms of the Act, this automatic disclosure by private companies is voluntary. This means that a private company is not obliged to make such disclosure. If a private company chooses to make such voluntary disclosure, it may do so by giving notice thereof in terms of Section 52(2) of the Act.

4.2 What records can you request?

(in terms of Section 51(1)(e))

Requests for records in respect of any of the companies in the Group are to be forwarded to our Information Officer as follows:

Full Name	: Clicks Group Limited
Registration Number	: 1996/000645/06
Registered Address	: Cnr. Searle & Pontac Streets, Cape Town, 8001
Postal Address	: P.O. Box 5142, Cape Town, 8000
Telephone Number	: +27 (0)21 460 1911
Fax Number	: +27 (0)21 460 1805
Head/CEO	: Bertina Engelbrecht
Designated Information Officer	: Ross Forgan
Designated Deputy Information Officer	: Keri Hattingh
Email Address of Information Officer	: popia@clicksgroup.co.za
Website	: http://www.clicksgroup.co.za

Requests for records in respect of the Clicks Group Retirement Fund are to be forwarded to our Information Officer as follows:

Name	Clicks Negotiated Provident Fund
Registration number	12/8/25816
Name	Clicks Negotiated Pension Fund
Registration number	12/8/25815
Name	Clicks Group Retirement Fund
Registration number	12/8/9883/2
Information Officer:	Sunilduth Harilall
Street Address:	Cnr. Searle & Pontac Streets, Cape Town, 8001
Postal Address:	P.O. Box 5142, Cape Town, 8000
Telephone:	+27 (0)21 460 1911
Website:	+27 (0)21 460 1805
E-mail:	principalofficer@clicksgroup.co.za

5. Categories of information

We hold the following categories of information:
the below list is not exhaustive

STATUTORY COMPANY INFORMATION

- (i) Memorandum of Incorporation;
- (ii) Certificate of Change of Name (if any);
- (iii) Certificate to Commence Business;
- (iv) Proxy Forms;
- (i) Register of Members;
- (v) Index of Members;
- (vi) Register of Mortgages and Debentures and Fixed Assets;
- (vii) Register of Directors' shareholdings;
- (viii) Register of Directors and Officers;
- (x) Directors' Attendance Register;
- (xi) Annual Financial Statements including:
 - (a) Annual accounts;
 - (b) Directors' reports;
 - (c) Auditor's report
- (xii) Books of Account regarding information required by the Companies Act, 2008;
- (xiii) Supporting schedules to books of account and ancillary books of account;

ACCOUNTING RECORDS

- (i) Books of Account including journals and ledgers;

AGREEMENTS AND CONTRACTS

- (i) Agreements with shareholders, officers or directors;
- (ii) Acquisition or disposal documentation;
- (iii) Agreements with contractors and suppliers;
- (iv) Restraint of trade agreements

TAXATION

- (i) Copies of all Income Tax Returns and other tax returns and documents.

LEGAL

- (i) Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation;
- (ii) Settlement agreements.

6. HOW WE USE YOUR PERSONAL INFORMATION

We process your Personal Information to provide you with services you have requested, to provide you with your rewards from participating in our loyalty programmes, to fulfil our statutory and regulatory obligations and to maintain and improve your experience on the Web Apps.

We may use your Personal Information to:

- comply with our regulatory reporting obligations, including submissions to the regulators that govern the operations of CGL (as a retailer, healthcare provider and processor of Personal Information) in the jurisdictions that CGL operates;
- comply with our statutory obligations, including submissions to the relevant government departments;
- facilitate the provision of services to you, which may be provided by us or by third parties appointed by us, which includes the virtual healthcare services;
- enable you to access third party software platforms or applications in order to participate in the services offered by CGL's affinity partners;
- conduct CGL's recruitment and hiring processes, which includes the conducting of criminal record and credit checks, referrals, the capturing of a job applicant's details and the providing of status updates to job applicants;
- retain and make information available to you on the Web Apps;
- create your user account and allow use of the Web Apps, and to analyse and compare how you and other users make use of the Web Apps, including (without limitation) your habits, click-patterns, preferences, frequency and times of use, trends and demographic information;
- establish and verify your identity on the Web Apps;
- operate, administer, maintain, secure and develop the Web Apps and the performance and functionality of the Web Apps;
- detect, prevent or manage actual or alleged fraud, security breaches or the abuse, misuse or unauthorised use of the Web Apps and contraventions of this Privacy Policy or any of terms and conditions that apply to your use of the Web Apps;
- inform you about any changes to the Web Apps, this Privacy Policy or other changes that are relevant to you;
- provide you with marketing material that is relevant to you;
- diagnose and deal with technical issues and customer support queries and other user queries;
- protect our rights in any litigation that may involve you;
- communicate with you and retain a record of our communications with you and your communications with us;
- enable your enjoyment of the benefits offered by CGL's affinity partners;
- analyse and compare the types of Access Devices that you make use of and your physical location; and
- for other lawful purposes that are relevant to our business activities or regulatory functions.

CGL will restrict its processing of your Personal Information to the original purpose for which it was collected, unless CGL reasonably considers that it is necessary to process it for another purpose that is compatible with the original purpose or where CGL is required to process that information in compliance with its legal obligations.

CGL may, where permitted or required to do so by applicable legislation, process your Personal Information without your knowledge or consent, and will do so in accordance with the further provisions of this Privacy Policy.

7. Categories of Data Subjects

Customers	Clients	Website/Application end Users	Suppliers
Patients	Vendors	Employees	Investors
No-Executive Directors	Other Third Parties	Visitors	Consultants

*The above list is not exhaustive

8. CATEGORIES OF INFORMATION (NATURAL AND JURISTIC PERSONS)

Identity / Passport Number	Marital Status	Health Information	Race
Age	Sex	Citizenship	Date of birth
Home Language	Phone Number	Physical Address	Telephone Number
Email address	Banking details	Tax information	Medical aid information
Employment history	Criminal history	Fingerprints	CV
Salary information	Benefit information	Registration Number	VAT number
FICA information	BEE information	Invoice details	Directors/Shareholders

*The above list is not exhaustive

9. CATEGORIES OF RECIPIENTS TO WHOM INFORMATION MAY BE SUPPLIED

Other Group Companies	Healthcare provider	Medical Aid	Family member
SAPS	SAPC	SAHPRA	Employees
Sub Contractors	Authorised Third Parties	Pension or Provident Fund	Auditing Bodies
Government Departments	Statutory Bodies	Judiciary	Statutory Commission
Affinity Partners			

*The above list is not exhaustive

10. STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION

- We store your Personal Information on our infrastructure or those of our service providers.
- We reserve the right to transfer to and/or store your Personal Information on infrastructure in a jurisdiction other than where it was collected, or outside of South Africa.
- If the location to which Personal Information is transferred and/or is stored does not have substantially similar data protection laws to those of South Africa, we will take reasonably practicable steps, including the imposition of appropriate contractual terms to ensure that your Personal Information is adequately protected in that jurisdiction.

Please contact us if you require further information as to the specific mechanisms used by us when transferring your Personal Information outside of South Africa or to a jurisdiction that is different to the one in which we collected your Personal Information.

11. SECURITY

- We take reasonable technical and organisational measures to secure the confidentiality and integrity of retained information and protect it from misuse, loss, alteration and destruction though

the use of accepted technological standards that prevent unauthorised access to or disclosure of your Personal Information. These measures are in line with the obligations imposed on us by legislation as a Responsible Party.

- We review our information collection, storage and processing practices, including physical security measures periodically, to ensure that we keep abreast of good practice.
- We are PCI DSS compliant.
- CGL has implemented procedures to address actual and suspected data breaches.
- We undertake to notify you and the relevant regulatory authorities of breaches in instances in which CGL is legally required to do so and within the period in which such notification is necessary.

12. PROCEDURE FOR REQUESTING ACCESS TO THE ABOVE INFORMATION

If you wish to request access to any of the above categories of information, you are required to complete a request form. These forms are available from:

- our information officer (whose contact details are in section A of this manual);
- the Information Regulator's website (www.inforegulator.org.za)

There is a prescribed fee (payable in advance) for requesting and accessing information in terms of the Act. Details of these fees are contained in the request form.

You may also be called upon to pay the additional fees prescribed by regulation for searching for and compiling the information, which you have requested, including copying charges.

It is important to note that access is not automatic – you must identify the right you are seeking to exercise or protect and explain why the record you request is required for the exercise or protection of that right. You will be notified in the manner indicated by you on the request form whether your request has been approved.

Should you wish to obtain a copy of this manual, or part thereof, such copy can be obtained from either:

Our head office or it can be downloaded from our website at <https://www.clicksgroup.co.za>

13. PRESCRIBED FEES.

- i. Once your request is made, CGL may require you to be a fee before access to any records will be provided or before any record will be reproduced.
- ii. If required, the prescribed fee must be paid before your request will be processed.
- iii. Payment of this fee is to be made as directed by the Information or Deputy Information Officer.
- iv. We will then make a decision in respect of your request and will notify you of our decision.
- v. Should your request be refused, you may lodge an application at court against the tender or payment of the requested fee as will be advised in the Notice to you (in terms of (sec 54(3)(b) of the Act).
- vi. If your request is granted then you will have to pay a further access fee for the search, reproduction and preparation of the record as well as for any time, that has exceeded the prescribed hours, to search and in order prepare the record for disclosure to you (in terms of sec 54(6) of the Act).

vii. The fees schedule can be found in Annexure B to the Regulations to the Promotion of Access to Information Act, 51 of 2000.

VALUE ADDED TAX: Please note that certain of Clicks Group Limited's subsidiaries are registered under the Value Added Tax Act (Act No. 89 of 19941) as a vendor and may in terms thereof add value added tax (VAT) to all fees prescribed.

14. PRESCRIBED FORMS.

Your request must be set out in the prescribed forms as listed below:

FORM	DESCRIPTION
Form 01	Request for a Guide from the Information Regulator
Form 01	Request for a copy of the Guide from the Information Officer of Clicks
Form 02	Request for access to a record from Clicks
Form 03	Outcome of request and fees payable
Form 04	Internal appeal form
Form 05	Complaint Form
Form 13	PAIA request for compliance assessment form

Once completed these forms must be forwarded to Ross Forgan or Sunilduth Harilall on the details provided above.