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PAIA Manual

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

Date: 2025-09-04

TABLE OF CONTENTS

1. Introduction	3
2. Definitions	3
3. Scope of the manual	4
4. How to use PAIA to access information	4
5. Overview of the structure and functions of Argility	5
6. Argility's contact details	5
7. Argility's processing of personal information in terms of POPIA	5
7.1. Purpose of Argility's Processing of Personal Information	5
7.2. Argility will not use the Personal Information which we collect for any purposes other than those purposes specified in paragraph 7.1.2 above.	6
7.3. Categories of Data Subjects and of the Personal Information relating thereto	6
7.4. Recipients or categories of recipients to whom Personal Information may be supplied	7
7.5. Planned Transborder Flows of Personal Information	7
7.6. Information Security Measures	7
8. Information held by Argility in terms of PAIA	8
8.1. Company records	8
8.2. Accounting records	8
8.3. Customer records	9
8.4. Human Resources records	9
8.5. Operations records	9
8.6. Marketing	9
9. Information kept by Argility in accordance with other legislation	9
10. Request Procedures	10
11. Timelines for consideration of a request	12
12. Grounds for refusal of access to records	12
13. Remedies available to a requestor on refusal of access	14
14. Other information held by Argility as prescribed	14
15. Availability of the manual	14
16. Prescribed forms and fee structure	14
ANNEXURE "A" – FORM 2 – PRESCRIBED FORM TO MAKE REQUEST FOR ACCESS	15
ANNEXURE "B" – LIST OF ENTITIES COMPRISING THE SMOLLAN GROUP MEMBERS	19

1. Introduction

This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act No.2 of 2000 ("**PAIA**").

The aim of the Manual is to assist potential Requesters in requesting access to information (documents, records and/or Personal Information) from Argility and all Smollan Group Members as contemplated under PAIA.

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.

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.

The definitions provided in this Manual are solely for the purpose of this Manual and are not to be taken as applicable to PAIA.

2. Definitions

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

- 2.1. "**Customer**" means a natural or juristic person who or which receives services and/or products from Argility;
- 2.2. "**Data Subject**" means the natural or juristic person to whom Personal Information relates;
- 2.3. "**Correspondence**" means any written and/or electronic communication exchanged between two or more parties;
- 2.4. "**Employee**" means any person who works for, or provides services to, or on behalf of Argility, and receives or is entitled to receive remuneration;
- 2.5. "**Argility**" means Argility Proprietary Limited, registration number 2007/010401/07, with its registered address at 2nd Floor, The Firs, Biermann Avenue, Rosebank, Johannesburg, 2196;
- 2.6. "**Smollan Group Member**" means each of the Smollan entities listed in Annexure "**B**" to this Manual.;
- 2.7. "**Information Officer/s**" means Argility's and/or the Smollan Group Member's designated information officer/s described in paragraph 6 of this Manual;
- 2.8. "**Manual**" means this manual, together with all annexures thereto as amended and made available on the website of Argility and at the offices of Argility from time to time;
- 2.9. "**PAIA**" means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder;
- 2.10. "**POPIA**" means the Protection of Personal Information Act No. 4 of 2013, together with any regulations published thereunder;

- 2.11. "**Personal Information**" has the meaning ascribed thereto under POPIA;
- 2.12. "**Processing**" means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –
- 2.12.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 2.12.2. dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or
 - 2.12.3. merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, "**Process**" has a corresponding meaning;
- 2.13. "**Requester**" means any person or entity (including any Data Subject) requesting access to a record that is under the control of Argility;
- 2.14. "**SAHRC**" means the South African Human Rights Commission; and
- 2.15. "**Third-Party**" means any independent contractor, agent, consultant, sub-contractor or other representative of Argility.

3. Scope of the manual

This Manual has been prepared in respect of, and applies to, Argility and the Smollan Group Members. Any reference to Argility under this Manual shall specifically include the Smollan Group Members.

4. How to use PAIA to access information

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

- 4.1. 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 of PAIA, the public body must be acting in the public interest.
- 4.2. Requests in terms of PAIA shall be made in accordance with the prescribed procedures, and at the prescribed fees.
- 4.3. A guide on how to use PAIA has been compiled by the SAHRC (and shall be updated by the Information Regulator from time to time) in terms of section 10 of PAIA and is available on the SAHRC website (www.sahrc.org.za). Any queries should be directed to:

The South African Human Rights Commission PAIA Unit | Research and Documentation Department

Postal Address: Private Bag 2700, Houghton, 2041, South Africa

T +27 (0)11 484 8300

F +27 (0)11 484 0582

E PAIA@sahrc.org.za

W www.sahrc.org.za

5. Overview of the structure and functions of Argility

- 5.1. Argility is incorporated and registered in the Republic of South Africa under registration number 2007/010401/07.
- 5.2. Argility is an investment holding company with a number of related entities (i.e. the Smollan Group Members) – which primarily comprise diversified services companies. In general, however, the main business functions of the Smollan Group Members pertain to the creation and execution of commerce solutions in the context of the provision of sales, marketing, data and technology, advisory, and business services.

6. Argility's contact details

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

Name of Body:	Argility Proprietary Limited
Physical & Postal Addresses:	<p>Physical: 2nd Floor, The Firs, Biermann Avenue, Rosebank, Johannesburg, 2196</p> <p>Postal: 2nd Floor, The Firs, Biermann Avenue, Rosebank, Johannesburg, 2196</p>
Head of Body	<p>Name: TL Long</p> <p>T: +27 11 712 1300</p> <p>E: tlong@argility.com</p>
Information Officer	<p>Name: Tanya Long</p> <p>T: +27 11 712 1300</p> <p>E: tlong@argility.com</p>

7. Argility's processing of personal information in terms of POPIA

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

7.1. Purpose of Argility's Processing of Personal Information

- 7.1.1. Argility 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.
- 7.1.2. Argility will retain Personal Information only for as long as is necessary to accomplish Argility's legitimate business purposes or for as long as may be permitted or required by applicable law.
- 7.1.3. We use the Personal Information we collect to serve our Customers, consider applicants, and market and promote our services. Some examples include –

- 7.1.4. Collecting Personal Information from existing Argility Customers in the context of the sale of Argility's products and services to such existing Customers.
- 7.1.5. Communicating with our Customers, suppliers and contractors by email, telephone, or text message, in accordance with their wishes;
- 7.1.6. Sharing Personal Information with Third Parties such as Argility's suppliers and regulators (such as, for example, the Information Regulator (under POPIA));
- 7.1.7. Monitoring the use of Argility's electronic systems and online platforms by Data Subjects;
- 7.1.8. Continuously evaluating and improving the online and mobile user experience of our Customers;
- 7.1.9. Undertaking research and data analytics in respect of Personal Information;
- 7.1.10. Sending Data Subjects notifications when Argility requires Data Subjects to participate on research projects, unless Data Subjects have told Argility that they do not want to receive such notifications;
- 7.1.11. Preventing, discovering and investigating violations of Argility's Privacy Policy, and investigating fraud, chargebacks or other matters; and
- 7.1.12. Contacting Customers with regard to their use of Argility's products and services and, in Argility's discretion, changes to the policies relating thereto.

7.2. Argility will not use the Personal Information which we collect for any purposes other than those purposes specified in paragraph 7.1.2 above.

7.3. Categories of Data Subjects and of the Personal Information relating thereto

- 7.3.1. Argility collects Personal Information directly from the Data Subject and/or from Third Parties, and where Argility obtains Personal Information from Third Parties, Argility 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 Argility is permitted to do so in terms of the applicable laws.
- 7.3.2. Data Subjects in respect of which Personal Information is Processed include Customers of Argility.
- 7.3.3. Examples of Third Parties from whom Personal Information is collected include other Smollan Group Members; our Customers when Argility handles Personal Information on their behalf; regulatory bodies; credit reference agencies (such as, for example, Experian, TransUnion, Compuscan and XDS, Lexis Nexus); other companies providing services to Argility and where Argility makes use of publicly available sources of information.

7.4. Recipients or categories of recipients to whom Personal Information may be supplied

- 7.4.1. Argility 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 Argility, our Customers, or others.

- 7.4.2. Argility will with POPIA before transferring Personal Information to a Third-Party who is not a contractor of Argility. Before transferring Personal Information to a Third-Party contractor, such as an authorised service provider, Argility will obtain assurances from the Third-Party that it will process Personal Information in a manner consistent with POPIA. Where Argility learns that a Third-Party contractor is using or disclosing Personal Information in a manner contrary to POPIA, Argility will take reasonable steps to prevent such use or disclosure.
- 7.4.3. We reserve the right to disclose and transfer a Data Subject's information, including their 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.

7.5. Planned Transborder Flows of Personal Information

In carrying out any cross-border transfers, Argility shall adhere to the provisions of POPIA.

7.6. Information Security Measures

- 7.6.1. The security and confidentiality of Personal Information is important to Argility. We have implemented reasonable technical, administrative, and physical security measures to protect Personal Information from unauthorised access or disclosure and improper use.
- 7.6.2. We are committed to ensuring that our security measures which protect your Personal Information are continuously reviewed and updated where necessary.
- 7.6.3. In Processing any Personal Information, Argility shall comply with the following minimum technical and organisational security requirements –

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

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 Information of all Data Subjects.

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

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

Physical access and privileges – Argility ensures that access to Personal Information is limited to Employees on a "need to know" basis, and Argility Employees are required to strictly utilise their unique user ID and applicable passwords to access the same.

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

Malware protection – Argility ensures that its environment has comprehensive malware protection software employed, which software is specifically designed to protect Argility from the most recent malware infections.

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

Systems Review – Argility 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.

8. Information held by Argility in terms of PAIA

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

This section of the Manual sets out the categories and descriptions of records held by Argility. 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.

8.1. Company records

- Company name documents
- Company registration documents
- Founding statement or Memorandum of Incorporation
- Minutes of meetings
- Licenses
- Licensing and franchising agreements
- Certification, professional qualifications and registration

8.2. Accounting records

- Details of accounting officer or auditors
- Formal books of account and financial statements
- Source documents
- Customs, excise and logistics
- Banking records
- Management reports
- Company tax returns

8.3. Customer records

- Promotional competitions

8.4. Human Resources records

- Employee policies
- Pension funds
- Recruitment
- Health and safety documentation
- Workplace Skills Plans (WSP)
- Annual Training report

8.5. Operations records

- Specifications
- Procedures
- Plans
- Stock records
- Asset register
- Corporate social investment/charity /BEE work done.

8.6. Marketing

- Website
- Marketing materials
- Marketing campaign history

9. Information kept by Argility in accordance with other legislation

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

9.1. Records are kept in accordance with legislation applicable to Argility, which includes but is not limited to, the following:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Competition Act 89 of 1998
- Constitution of the Republic of South Africa, 1996
- Consumer Protection Act 68 of 2008
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962 (Section 75)
- Insolvency Act 24 of 1936
- Labour Relations Act 66 of 1995
- National Credit Act 34 of 2005
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Pension Funds Act 24 of 1956
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013

- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- Skills Development Act 97 of 1998
- Tax Administration Act 28 of 2011
- Tax on Retirement Funds Act 38 of 1996
- Trademarks Act 194 of 1993
- Value Added Tax Act 89 of 1991

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

10. Request Procedures

10.1. Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA.

10.2. Form of request

10.2.1. The Requester must use the prescribed form to make the request for access to a record, which form is attached hereto as Annexure "A". This must be made to the Information Officer at the address, fax number or electronic mail address of the body concerned (*see s 53(1) of PAIA*).

10.2.2. The Requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requester. 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*).

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

10.2.4. 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*).

10.3. Fees

10.3.1. Request fees:

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

10.3.1.2. The fee that the Requester must pay to a private body is R50. The Requester may lodge an application to the court against the tender or payment of the request fee (*See section 54(3)(b) of PAIA*).

10.3.2. Access fees and fees for reproduction:

10.3.2.1. If access to a record/s is granted by Argility, the Requester may be required to pay an access fee for the search for and preparation of the records and for reproduction of the record/s.

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

	Reproduction	Fee (Rand)
1.	Photocopy of an A4-size page or part thereof provided in hard copy or via scanned copy sent via email	R1.10 per page
2.	Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	R0.75 per page
3.	A copy of, in a computer readable form on compact disc	R70.00
4.	Transcription of visual images on an A4-size page or part thereof	R40.00 per page
5.	Copy of visual images	R60.00
6.	Transcription of an audio record on an A4-size page or part thereof	R20.00
7.	Copy of an audio record	R30.00

10.4. Decision on request

10.4.1. After the Information Officer has made a decision on the request, the Requester will be notified using the required form.

10.4.2. 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 hours to search and prepare the record for disclosure (*see s 54(6) of PAIA*).

11. Timelines for consideration of a request

- 11.1. 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 –
- 11.2. 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);
- 11.3. where the request requires a search for records in, or collection of such records from, an office of Argility located far away from Johannesburg;
- 11.4. consultation among divisions of Argility or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original 30-day period;
- 11.5. more than one of the circumstances contemplated in paragraphs 11.2, 11.3 and 11.4, exist in respect of the request making compliance with the original period not reasonably possible; or
- 11.6. the Requester consents in writing to such extension.
- 11.7. 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 then deemed to have been refused.

12. Grounds for refusal of access to records

- 12.1. Requests for access by a Requestor **must** be refused by the Information Officer if –
 - 12.1.1. the disclosure would involve the unreasonable disclosure of personal information about a third party (natural person), including a deceased individual (see section 63 of PAIA);
 - 12.1.2. 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 party the 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);
 - 12.1.3. 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);
 - 12.1.4. the disclosure could reasonably be expected to endanger the life or physical safety of an individual (see section 66(a) of PAIA);

12.1.5. 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

12.1.6. 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 third party; (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 section 69 of PAIA).

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

12.2.1. 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 accordance with 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));

12.2.2. the record:

12.2.2.1. contains trade secrets of Argility;

12.2.2.2. 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 Argility;

12.2.2.3. contains information, the disclosure of which could reasonably be expected:

12.2.2.3.1. to put Argility at a disadvantage in contractual or other negotiations; or

12.2.2.3.2. to prejudice Argility in commercial competition; or

12.2.2.4. is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by Argility, except insofar as it is required to give access to a record to which access is granted in terms of PAIA; or

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

13. Remedies available to a requestor on refusal of access

13.1. Argility does not have any internal appeal procedures that may be followed once a request to access information has been refused.

13.2. The decision of the Information Officer or deputy information officer is final.

- 13.3. If you are not satisfied with the outcome of your request, you are entitled to apply to a court of competent jurisdiction to take the matter further.

14. Other information held by Argility 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.

15. Availability of the manual

(Availability of Manual under section 51(3))

- 15.1. This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of Argility. Copies of the Manual may be made, subject to the prescribed fees.
- 15.2. Copies may also be requested from the South African Information Regulator.
- 15.3. The Manual is also posted on Argility's website referred to above.

16. 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 Government Gazette, or at the website of the Department of Justice and Constitutional Development (www.doj.gov.za), under the 'regulations' section as well as the SAHRC website (www.sahrc.org.za).

ANNEXURE "A" – FORM 2 – PRESCRIBED FORM TO MAKE REQUEST FOR ACCESS

FORM 2**REQUEST FOR ACCESS TO RECORD**

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

--

Mark with an "X"

--

Request is made in my own name person.

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (<i>when made on behalf of another person</i>)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (<i>if applicable</i>):			
Identity Number			

Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
PARTICULARS OF RECORD REQUESTED			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD (Mark the applicable box with an "X")			
Record is in written or printed form			
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	
MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	
PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
<p>a) A request fee must be paid before the request will be considered.</p> <p>b) You will be notified of the amount of the access fee to be paid.</p> <p>c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</p> <p>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption</p>	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester/person on whose behalf the request is made

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(State Rank, Name And Surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

ANNEXURE "B" – LIST OF ENTITIES COMPRISING THE SMOLLAN GROUP MEMBERS

NAME OF PRIVATE BODY	REGISTRATION NUMBER	MAIN BUSINESS
Argility Proprietary Limited	2007/010401/07	Data & Tech Company
Chirp Insights Pty Limited	2012/184965/07	Data & Tech Company
Smollan Activation and Experience Proprietary Limited	2006/015162/07	Activation and Experience Company
Cquential Solutions Proprietary Limited	2005/000855/07	Data & Tech Company
DataOrbis Proprietary Limited	2011/008421/07	Data & Tech Company
Elevator People Proprietary Limited	2013/058527/07	Diversified Services Company
F G Knights Proprietary Limited	2009/014582/07	Diversified Services Company
Fieldmarketing Group Proprietary Limited	1982/006485/07	Diversified Services Company
Fleet Domain Online Systems Proprietary Limited	2009/001373/07	Fleet Management Company
Harding Trend Sales Proprietary Limited	2009/007766/07	Merchandising Sales
IMA SA Proprietary Limited	2015/052885/07	Diversified Services Company
K-Markt Retail Services Proprietary Limited	2009/007151/07	Diversified Services Company
Marketing Transform Proprietary Limited	2016/402986/07	Diversified Services Company
Mediametrics Proprietary Limited	2013/129577/07	Diversified Services Company
NEO Retail Solutions Proprietary Limited	2019/584989/07	Data & Tech Company
Nestdiv Trading Proprietary Limited	2018/062237/07	Diversified Services Company
Parmalat Fieldmarketing Services Proprietary Limited	2000/005053/07	Diversified Services Company
Pioneer Foods Instore Proprietary Limited	1988/004036/07	Diversified Services Company
Precision Collect Proprietary Limited	2013/219410/07	Financial Services Company
Quattro Retail Services Proprietary Limited	2017/513359/07	Diversified Services Company
Retailer Solutions Proprietary Limited	1999/002437/07	Diversified Services Company
Return on Investment Media Proprietary Limited (e-Complete)	2015/073944/07	Data & Tech Company
RTMA Group Proprietary Limited	2015/390944/07	Diversified Services Company

Sea Shadow Trade and Invest 189 Proprietary Limited	2011/008030/07	Diversified Services Company
Skydata Communications Proprietary Limited	1998/012222/07	Data & Tech Company
Smollan Diversified Services Proprietary Limited	1997/010934/07	Diversified Services Company
Smollan Financial Services Proprietary Limited (SFS)	2015/326267/07	Financial Services Company
Smollan Group SA Proprietary Limited	1993/003901/07	Diversified Services Company
Smollan Pharmacy Proprietary Limited	2010/023065/07	Diversified Services Company
Smollan Properties Proprietary Limited	1985/005243/07	Property Holding Company
Smollan SA Services Proprietary Limited	2009/004987/07	Diversified Services Company
Smollan Sales and Marketing Proprietary Limited	1971/012582/07	Diversified Services Company
Student Village Proprietary Limited	2006/005416/07	Diversified Services Company
TDFS Operations Proprietary Limited	2000/010528/07	Diversified Services Company
The Retail Workshop Proprietary Limited	2010/003993/07	Diversified Services Company
Tshimedzwa Cellular Proprietary Limited	2015/137308/07	Mobile Services Company
Tshimedzwa Talent Solutions Proprietary Limited	1981/001818/07	Recruitment Company
Tshimedzwa Development Centre Proprietary Limited	2015/137671/07	Learning and Development Company
Tshimedzwa Field Services Proprietary Limited (previously called Tshimedzwa Learning Academy Pty Ltd)	2015/137656/07	Learning & Development Company
Retail Marketing Services Proprietary Limited	2001/003889/07	Diversified Services Company
Smollan Holdings Proprietary Limited	1981/001679/07	Investment Holding Company
Smollan Global Services Proprietary Limited	2000/006179/07	Diversified Services Company
Ashanti Ai Proprietary Limited	2017/364102/07	Data & Tech Company
RCA Marketing Proprietary Limited	2011/011670/07	Diversified Services Company
Yebo Fresh Proprietary Limited	2016/438089/07	Diversified Services Company