



GL Attorneys

Est. 2003

Protection of Personal Information Manual

Policies and Procedures

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Preface

The Protection of Personal Information Act 4 of 2013 recognises that, in terms of the Constitution of South Africa, everyone has the right to privacy. This includes the right against unlawful collection, retention, dissemination and use of personal information. The Act therefore regulates the processing of personal information by public and private bodies in a manner that gives effect to the constitutional right to privacy subject to justifiable limitations that are aimed at protecting other rights and important interests, particularly the right to access to information.

The Act requires responsible parties to take actions to ensure protection of personal information when processing, and compliance with the eight lawful conditions of processing set out in the Act.

Definitions

The following terms used in this manual and legislation are defined as follows:

“The Act”: The Protection of Personal Information Act, 4 of 2013, and includes any regulation under the Act.

“Biometrics”: A technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.

“Body”: public or private body.

“Code of conduct”: A code of conduct issued by the Regulator in terms of Chapter 7 of the Act.

“Competent person”: Any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child.

“Consent”: Any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

“Constitution”: The Constitution of the Republic of South Africa of 1996.

“Data subject”: The person to whom personal information relates.

“De-identify”: In relation to personal information of a data subject, means to delete any information that identifies the data subject, can be used or manipulated by a reasonably foreseeable method to identify the data subject, or can be linked by a reasonably foreseeable method to other information that identifies the data subject.

“Direct marketing”: To approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject, or requesting the data subject to make a donation of any kind for any reason. GL Attorneys Incorporated does not process personal information for the purpose of direct marketing.

“Electronic communication”: Any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient’s terminal equipment until it is collected by the recipient.

“Filing system”: Any structured set of information, whether centralised, decentralised or dispersed on a functional or geographical basis, which is accessible according to specific criteria.

“GL Attorneys Incorporated”: means GL Attorneys Incorporated (Reg No: 2003/011044/21) and shall hereinafter be referred to as “GLA” or, where appropriate, as “the responsible party”.

“Head”: of, or in relation to, a private body means:

- a) in the case of a natural person, that natural person or any person duly authorised by that natural person;
- b) in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership; or
- c) in the case of a juristic person the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer.

“Minister”: The Cabinet member responsible for the administration of justice.

“Operator”: A person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

“Person”: A natural person or a juristic person.

“Personal information”: Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

“POPI”: Protection of Personal Information.

“POPIA”: Protection of Personal Information Act of 2013.

“PAIA”: Promotion of Access to Information Act of 2000.

“Prescribed”: Prescribed by regulation or by a code of conduct.

“Private body”:

- a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- b) a partnership which carries or has carried on any trade, business or profession; or
- c) any former or existing juristic person but excludes a public body.

“Processing”: Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, as well as restriction, degradation, erasure or destruction of information.

“Public body”:

- a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- b) any other functionary or institution when:
 - i. exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - ii. exercising a public power or performing a public function in terms of any legislation.

“Public record”: A record that is accessible in the public domain and which is in the possession of or under the control of a public body, whether or not it was created by that public body.

“Record”: Any recorded information:

- a) regardless of form or medium, including any of the following:
 - i. Writing on any material;
 - ii. information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device,

and any material subsequently derived from information so produced, recorded or stored;

- iii. label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- iv. book, map, plan, graph or drawing;
- v. photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;

b) in the possession or under the control of a responsible party;

c) whether or not it was created by a responsible party; and

d) regardless of when it came into existence.

“Regulator”: The Information Regulator established in terms of section 39 of the Act.

“Re-identify”: In relation to personal information of a data subject, means to resurrect any information that has been de-identified, that:

- a) identifies the data subject;
- b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or
- c) can be linked by a reasonably foreseeable method to other information that identifies the data subject, “re-identified” has a corresponding meaning.

“Republic”: The Republic of South Africa.

“Responsible party”: A public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

“Restriction”: To withhold from circulation, use or publication any personal information that forms part of a filing system, but not to delete or destroy such information.

“Special personal information”:

- a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or
- b) the criminal behaviour of a data subject to the extent that such information relates to:
 - i. the alleged commission by a data subject of any offence; or
 - ii. any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

“Unique identifier”: Any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

Introduction to the company and the type of business

GLA is a private body and legal practice, registered as such with the Legal Practice Council.

The website address of GLA is www.gla.co.za.

Part 1: The Information Officer and Deputy Information Officers

As a responsible party, GLA must ensure that the conditions for the lawful processing of personal information are complied with. This is done through the appointment of an Information Officer who will take responsibility and accountability for the provisions of the Act.

The Information Officer is the person duly authorised by the Head of GLA. This individual has accepted and acknowledged his role in this capacity and is aware of the accountability that comes with it. Please refer to Annexure “GLA1” hereto for the acceptance of this responsibility by the relevant individual.

Information Officers are required to designate one or more Deputy Information Officers. As such, GLA has appointed four Deputy Information Officers to whom the responsibilities in terms of the Act as well as PAIA, will be delegated. The Deputy Information Officers will be afforded sufficient time, adequate resources and the financial means to devote to matters concerning POPIA and PAIA.

The Deputy Information Officers will report to the Information Officer. He will be accessible to all relevant parties within the entity as well as outside to be able to fulfill the duties. These individuals will be responsible for implementing the POPI policies and procedures within the entity. Annexures “GLA1” to “GLA5”, set out the duties of the Information Officer and the Deputy Information Officers, as well as the formal acceptance of these duties.

Despite the designation of Deputy Information Officers, the Information Officer retains the accountability and responsibility for the functions delegated to the Deputy Information Officers.

The current Information Officer and Deputy Information Officers completed the required registration forms, copies of which are attached hereto as Annexures “GLA6” to “GLA8”. The registration forms include the following details:

1. The full names of the Information Officer and each Deputy Information Officer;
2. Their contact numbers and email addresses; and

3. The physical and postal address of the Information Officer.

The Information Regulator accepted the registration and issued a certificate, attached hereto as Annexure “GLA9”.

The name of the responsible party was changed from “Groenewald Lubbe Incorporated” to “GL Attorneys” with effect from 11 August 2022. A disclosure certificate issued by the Companies and Intellectual Property Commission is attached hereto as Annexure “GLA10”.

The registration of the Information Officer and Deputy Information Officers of GL Attorneys was accepted by the Information Regulator, as confirmed by the certificate attached hereto as Annexure “GLA11”.

Part 2: Promotion of Access to Information Act Guide

A Guide has been compiled in terms of Section 10 of PAIA by the Human Rights Commission. It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages.

The Guide is available for inspection, *inter alia*, at the office of the Human Rights Commission at Braampark Forum 3, 33 Hoofd Street, Braampark, Johannesburg and on its website at www.sahrc.org.za.

Responsibility for the Guide was transferred to the Information Regulator in terms of section 114 of POPIA on 30 June 2021.

Part 3: Publication and availability of certain records

At this stage no notice affecting GLA has been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

Part 4: Description of records available in terms of other legislation

Records available in terms of other legislation are as follows:

1. Income Tax Act 58 of 1962;
2. Value Added Tax Act 89 of 1991;
3. Labour Relations Act 66 of 1995;
4. Basic Conditions of Employment Act 75 of 1997;
5. Employment Equity Act 55 of 1998;
6. Skills Development Levies Act 9 of 1999; and
7. Unemployment Insurance Act 63 of 2001.

Category of record	Details of record	Availability
Companies Act records	Documents of incorporation Share register Minutes of directors' meetings Records relating to the appointment of the directors / auditors / secretary / information officer and other officers Other statutory registers including the Covid-19 records	PAIA request (see below)
Financial records	Annual Financial Statements Tax Returns Accounting Records Banking Records Asset Register Invoices	PAIA request (see below)

<p>Income Tax records</p>	<p>PAYE records Documents issued to employees for income tax purposes Records of payments made to SARS on behalf of employees All other statutory compliance records: 1. VAT 2. Skills Development Levies 3. UIF</p>	<p>PAIA request (see below)</p>
<p>Personnel documents and records</p>	<p>Employment contracts Medical Aid records Disciplinary records Salary records Leave records Training records</p>	<p>PAIA request (see below)</p>

Part 5: Form of request for access to records and prescribed fees

The requestor must complete Form C of Annexure B to the Regulations to the Promotion of Access to Information Act 2 of 2000 (published under Government Notice R187 in *Government Gazette* 23119 of 15 February 2002 as amended by Government Notice R1244 in *Government Gazette* 25411 of 22 September 2003) and submit this form together with a request fee, to the Head of GLA or to the Information Officer.

A request for records may be submitted to the Head of GLA or to the Information Officer by electronic mail to both the general email address of GLA and to the direct email address of the Information Officer.

The form for a request for access must at least require the requestor concerned-

- (a) to provide sufficient particulars to enable the Head of GLA or the Information Officer to identify-
 - (i) the record or records requested; and
 - (ii) the requestor;
- (b) to indicate which form of access is required;
- (c) to specify a postal address or fax number of the requestor in the Republic;
- (d) to identify the right the requestor is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right;
- (e) if, in addition to a written reply, the requestor wishes to be informed of the decision on the request in any other manner, to state that manner and the necessary particulars to be so informed; and
- (f) if the request is made on behalf of a person, to submit proof of the capacity in which the requestor is making the request, to the reasonable satisfaction of the Head of GLA or the Information Officer.

A requestor is required to pay the prescribed fees before a request will be processed in terms of the Regulations regarding the Promotion of Access to Information published in Government Notice R187 of 2002 in Government Gazette 23119 of 15 February 2002.

Records may be withheld until the fees have been paid.

The fee structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za.

Part 6: The requirements of POPIA

Please refer to the privacy policy of GLA on its website at www.gla.co.za.

Part 7: Safeguarding of Information

GLA will secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent:

- a) Loss of, damage to or unauthorised destruction of personal information; and
- b) Unlawful access to or processing of personal information.

GLA has performed a risk assessment to identify internal and external risks to personal information in our possession or under our control. This was done based on where information is stored and who has access to it to identify the risk of the above.

The risks identified are as follows:

- a) Loss of Data;
- b) Unauthorised access or theft of data;
- c) Unauthorised sharing of data; and
- d) Inaccurate and outdated data.

Safeguards have been implemented to mitigate the identified risks. These safeguards are monitored on a regular basis and updated as necessary where deficiencies are identified.

The following safeguards are implemented:

- a) Internal policies;
- b) Antivirus;
- c) Firewalls;
- d) Access controls; and

e) Remote destruction.

Part 8: Security Compromises

Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, GLA shall notify:

- a) the Regulator; and
- b) the data subject, unless the identity or contact information of the data subject cannot be established.

The notification will be made as soon as reasonably possible after the discovery of the compromise, taking into account the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the responsible party's information system.

The notification will only be delayed if a public body responsible for the prevention, detection or investigation of offences or the Regulator determines that notification will impede a criminal investigation by the public body concerned.

The notification to a data subject shall be in writing and communicated to the data subject in at least one of the following ways:

- a) mailed to the data subject's last known physical or postal address;
- b) sent by e-mail to the data subject's last known e-mail address;
- c) placed in a prominent position on the website of the responsible party;
- d) published in the news media; or
- e) as may be directed by the Regulator.

The following information will be included in notifications:

- a) a description of the possible consequences of the security compromise;

- b) a description of the measures that we intend to take or have taken to address the security compromise;
- c) a recommendation with regard to the measures to be taken by the data subject to mitigate the possible adverse effects of the security compromise; and
- d) if known, the identity of the unauthorised person who may have accessed or acquired the personal information.

Part 9: Internal training and awareness

Training will be provided at regular intervals to employees as well as to the Information Officer and Deputy Information Officers in order to ensure that everyone is informed and keep abreast of the requirements of POPIA and PAIA, as well as the policies and procedures within GLA to ensure compliance.

Part 10: Retention and disposal of personal information

GLA does not retain Personal Information any longer than is necessary for achieving the purpose for which the Personal Information was collected and processed.

Personal Information is retained for at least seven years from the date of the last entry recorded on a specific file, as contemplated in Rule 54.9.2 of the Legal Practice Council's rules.

GLA, as a responsible party, must destroy or delete a record of Personal Information or de-identify Personal Information as soon as reasonably practicable after it is no longer authorised to retain the record.

Personal Information is destroyed or deleted in a manner that prevents its reconstruction in an intelligible form.

APPOINTMENT LETTER

Appointment as Information Officer pursuant to **Section 55 of the Protection of Personal Information Act.**

(hereinafter referred to as the "Act")

Groenewald Lubbe Incorporated

duly represented by

Jacob Johannes Lubbe

(hereinafter referred to as the "Responsible Party")

hereby designates

Kris Harmse

as

Information Officer

(hereinafter referred to as the "IO")

The appointment shall take effect on the date of signature of this Appointment Letter.

The IO's appointment does not impact his/her underlying employment relationship with the Responsible Party and the duration of the appointment as IO shall coincide with the duration of the employment agreement with the Responsible Party and shall immediately terminate as consequence of termination of the employment agreement, unless terminated in writing before the time.

(i) Duties of the IO

The IO's duties shall include the following in terms of *Section 55* of the Act:

- The encouragement and monitoring of compliance, by the employer organisation, with the conditions for the lawful processing of personal information;
- Dealing with the requests made to the employer organisation pursuant to the Act;
- Working with the Regulator in relation to investigations conducted pursuant to Chapter 6 in relation to the employer organisation;

- Otherwise ensuring compliance by the employer organisation with the provisions of this Act; and
- Any other duty as may be prescribed from time to time.

In addition to the above duties and in terms of Regulation 4, to also ensure:

- That a compliance framework is developed, implemented, monitored and maintained;
- A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for lawful processing of Personal Information;
- That a manual is developed, monitored, maintained and made available as prescribed in Section 14 and 51 of PAIA;
- That the reports envisaged in Section 32 of PAIA are submitted to the Regulator annually.
- That any incidents of breach of personal information and/or any other acts that are in contravention of the POPIA, in accordance with the provisions of *Section 22*, is reported to the Information Regulator;
- To act as a contact point for the exercise of data subjects' rights under *Section 23* of the Act, and dealing with their inquiries related to data processing activities.

(ii) Position of the Information Officer

In compliance with *Section 55(2)* of the Act, the IO will take up his/her duties only after the Responsible Party has registered him/her with the Information Regulator in this capacity.

The Information Officer shall;

- Always report in writing and directly to the highest management level of the Responsible Party in the instance of the IO not being a member of the Board of Directors him/herself;
- Not enjoy any power to represent the Responsible Party, unless authorised to do so;
- Cease to Act in such capacity where there is a conflict of interest. *E.g.* in the instance where he/she is appointed in a position within the employer organisation resulting in the IO having to manage competing objectives that could lead to information protection taking a secondary role to business interests.

[By signing this Letter of Appointment, the IO commits to notify the Responsible Party immediately and, in any case, without undue delay, in case a conflict of interest should arise in future].

(iii) Duties of the Responsible Party

The Responsible Party undertakes to:

- Provide the IO with the reasonable training, assistance and resources to permit the proper performance of his/her task as IO;
[In this regard the IO is to timeously notify the Responsible Party of any such training, assistance, resources (within the body's means)];
- Promptly involve the IO in all matters related to the protection of personal data;
- Refrain from providing instructions about the way the IO should perform their tasks, unless there is reason to believe that the IO is acting contrary to its legal and contractual obligations;
- Ensure that the IO performs their tasks autonomously and independently;
- Refrain from assigning tasks to the IO that may lead to, or result in a conflict of interest for the latter.

The name and contact details of the IO (e.g. postal address, telephone, e-mail) will be shared within the Responsible Party's corporation and in addition thereto, and as required by the Act, will be officially communicated to the Information Regulator for purposes of giving effect to this appointment.

RESPONSIBLE PARTY

DONE and SIGNED at Randburg on this the 29 day of April **2021**.



Signature:


Jacob Johannes Lubbe

Name:

(On behalf of and duly authorised thereto)

INFORMATION OFFICER

DONE and SIGNED at Randburg on this the 29 day of April **2021**.



Signature:

Kris Harmse

Name:

**DESIGNATION AND DELEGATION OF AUTHORITY TO THE DEPUTY
INFORMATION OFFICER**

*(In terms of section 56 of the Protection of Personal Information Act, 2013 (POPIA) and Section 17(1)
of the Promotion of Access to Information Act, 2000(PAIA)*

I, the undersigned,

Kris Harmse

hereby designate Dornecha Capele as a Deputy Information Officer of
Groenewald Lubbe Incorporated.

Furthermore, I hereby delegate to you the powers, duties and responsibilities, as conferred or imposed on me by POPIA and PAIA.

Please be advised that I reserve the right to exercise any of the powers, duties and responsibilities conferred herein, as well as the right to amend and/or withdraw any of those powers, duties and responsibilities.



INFORMATION OFFICER

By my signature herein below, I hereby accept the delegation and designation as the Deputy Information Officer along with all the duties and responsibilities that accompany such appointment in terms of POPIA and PAIA. Such duties and responsibilities are set out in Annexure "A" to this document.

DEPUTY INFORMATION OFFICER

DONE and SIGNED at Randburg on this the 29 day of April **2021.**

Carpede

Designate signature:

Doretha Carpede

Name:

Annexure "A"

DUTIES OF THE DEPUTY INFORMATION OFFICER

The Deputy Information Officer's duties shall include the following in terms of *Section 55* of the Protection of Personal Information Act;

- The encouragement and monitoring of compliance, by the employer organisation, with the conditions for the lawful processing of personal information;
- Dealing with the requests made to the employer organisation pursuant to the Act;
- Working with the Regulator in relation to investigations conducted pursuant to Chapter 6 in relation to the employer organisation;
- Otherwise ensuring compliance by the employer organisation with the provisions of this Act; and
- Any other duty as may be prescribed from time to time.

In addition to the above duties and in terms of Regulation 4, to also ensure:

- That a compliance framework is developed, implemented, monitored and maintained;
- A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for lawful processing of information;
- That a manual is developed, monitored, maintained and made available as prescribed in Section 14 and 51 of PAIA;
- That the reports envisaged in Section 32 of PAIA are submitted to the Regulator annually.
- That any incidents of breach of personal information and/or any other acts that are in contravention of the POPIA, in accordance with the provisions of *Section 22*, is reported to the Information Regulator;
- To act as a contact point for the exercise of data subjects' rights under *Section 23* of the Act, and dealing with their inquiries related to data processing activities.

Correct

**DESIGNATION AND DELEGATION OF AUTHORITY TO THE DEPUTY
INFORMATION OFFICER**

*(In terms of section 56 of the Protection of Personal Information Act, 2013 (POPIA) and Section 17(1)
of the Promotion of Access to Information Act, 2000(PAIA)*

I, the undersigned,

Kris Harmse

hereby designate Santie Vosloo as a Deputy Information Officer of
Groenewald Lubbe Incorporated.

Furthermore, I hereby delegate to you the powers, duties and responsibilities, as conferred or imposed on me by POPIA and PAIA.

Please be advised that I reserve the right to exercise any of the powers, duties and responsibilities conferred herein, as well as the right to amend and/or withdraw any of those powers, duties and responsibilities.



INFORMATION OFFICER

By my signature herein below, I hereby accept the delegation and designation as the Deputy Information Officer along with all the duties and responsibilities that accompany such appointment in terms of POPIA and PAIA. Such duties and responsibilities are set out in Annexure "A" to this document.

DEPUTY INFORMATION OFFICER

DONE and SIGNED at Randburg on this the 29 day of April 2021.



Designate signature:

Santie Veslco

Name:

Annexure "A"

DUTIES OF THE DEPUTY INFORMATION OFFICER

The Deputy Information Officer's duties shall include the following in terms of *Section 55* of the Protection of Personal Information Act;

- The encouragement and monitoring of compliance, by the employer organisation, with the conditions for the lawful processing of personal information;
- Dealing with the requests made to the employer organisation pursuant to the Act;
- Working with the Regulator in relation to investigations conducted pursuant to Chapter 6 in relation to the employer organisation;
- Otherwise ensuring compliance by the employer organisation with the provisions of this Act; and
- Any other duty as may be prescribed from time to time.

In addition to the above duties and in terms of Regulation 4, to also ensure:

- That a compliance framework is developed, implemented, monitored and maintained;
- A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for lawful processing of information;
- That a manual is developed, monitored, maintained and made available as prescribed in Section 14 and 51 of PAIA;
- That the reports envisaged in Section 32 of PAIA are submitted to the Regulator annually.
- That any incidents of breach of personal information and/or any other acts that are in contravention of the POPIA, in accordance with the provisions of *Section 22*, is reported to the Information Regulator;
- To act as a contact point for the exercise of data subjects' rights under *Section 23* of the Act, and dealing with their inquiries related to data processing activities.

**DESIGNATION AND DELEGATION OF AUTHORITY TO THE DEPUTY
INFORMATION OFFICER**

*(In terms of section 56 of the Protection of Personal Information Act, 2013 (POPIA) and Section 17(1)
of the Promotion of Access to Information Act, 2000(PAIA)*

I, the undersigned,

Kris Harmse

hereby designate Kuzhula Tazani Maluleke as a Deputy Information Officer of
Groenewald Lubbe Incorporated.

Furthermore, I hereby delegate to you the powers, duties and responsibilities, as conferred or
imposed on me by POPIA and PAIA.

Please be advised that I reserve the right to exercise any of the powers, duties and responsibilities
conferred herein, as well as the right to amend and/or withdraw any of those powers, duties and
responsibilities.



INFORMATION OFFICER

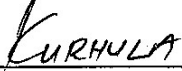
*By my signature herein below, I hereby accept the delegation and designation as the Deputy
Information Officer along with all the duties and responsibilities that accompany such appointment in
terms of POPIA and PAIA. Such duties and responsibilities are set out in Annexure "A" to this document.*

DEPUTY INFORMATION OFFICER

DONE and SIGNED at Rendburg on this the 29 day of April 2021.



Designate signature:



Name:

Annexure "A"

DUTIES OF THE DEPUTY INFORMATION OFFICER

The Deputy Information Officer's duties shall include the following in terms of *Section 55* of the Protection of Personal Information Act;

- The encouragement and monitoring of compliance, by the employer organisation, with the conditions for the lawful processing of personal information;
- Dealing with the requests made to the employer organisation pursuant to the Act;
- Working with the Regulator in relation to investigations conducted pursuant to Chapter 6 in relation to the employer organisation;
- Otherwise ensuring compliance by the employer organisation with the provisions of this Act; and
- Any other duty as may be prescribed from time to time.

In addition to the above duties and in terms of Regulation 4, to also ensure:

- That a compliance framework is developed, implemented, monitored and maintained;
- A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for lawful processing of information;
- That a manual is developed, monitored, maintained and made available as prescribed in Section 14 and 51 of PAIA;
- That the reports envisaged in Section 32 of PAIA are submitted to the Regulator annually.
- That any incidents of breach of personal information and/or any other acts that are in contravention of the POPIA, in accordance with the provisions of *Section 22*, is reported to the Information Regulator;
- To act as a contact point for the exercise of data subjects' rights under *Section 23* of the Act, and dealing with their inquiries related to data processing activities.



**DESIGNATION AND DELEGATION OF AUTHORITY TO THE DEPUTY
INFORMATION OFFICER**

*(In terms of section 56 of the Protection of Personal Information Act, 2013 (POPIA) and Section 17(1)
of the Promotion of Access to Information Act, 2000(PAIA)*

I, the undersigned,

Kris Harmse

hereby designate Jacco Kamstra as a Deputy Information Officer of
Groenewald Lubbe Incorporated.

Furthermore, I hereby delegate to you the powers, duties and responsibilities, as conferred or
imposed on me by POPIA and PAIA.

Please be advised that I reserve the right to exercise any of the powers, duties and responsibilities
conferred herein, as well as the right to amend and/or withdraw any of those powers, duties and
responsibilities.



INFORMATION OFFICER

*By my signature herein below, I hereby accept the delegation and designation as the Deputy
Information Officer along with all the duties and responsibilities that accompany such appointment in
terms of POPIA and PAIA. Such duties and responsibilities are set out in Annexure "A" to this document.*

DEPUTY INFORMATION OFFICER

DONE and SIGNED at Roodepoort on this the 29th day of April **2021.**



Jacco Kamstra

Designate signature:

Jacco Kamstra

Name:

Annexure "A"

DUTIES OF THE DEPUTY INFORMATION OFFICER

The Deputy Information Officer's duties shall include the following in terms of *Section 55* of the Protection of Personal Information Act;

- The encouragement and monitoring of compliance, by the employer organisation, with the conditions for the lawful processing of personal information;
- Dealing with the requests made to the employer organisation pursuant to the Act;
- Working with the Regulator in relation to investigations conducted pursuant to Chapter 6 in relation to the employer organisation;
- Otherwise ensuring compliance by the employer organisation with the provisions of this Act; and
- Any other duty as may be prescribed from time to time.

In addition to the above duties and in terms of Regulation 4, to also ensure:

- That a compliance framework is developed, implemented, monitored and maintained;
- A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for lawful processing of information;
- That a manual is developed, monitored, maintained and made available as prescribed in Section 14 and 51 of PAIA;
- That the reports envisaged in Section 32 of PAIA are submitted to the Regulator annually.
- That any incidents of breach of personal information and/or any other acts that are in contravention of the POPIA, in accordance with the provisions of *Section 22*, is reported to the Information Regulator;
- To act as a contact point for the exercise of data subjects' rights under *Section 23* of the Act, and dealing with their inquiries related to data processing activities.

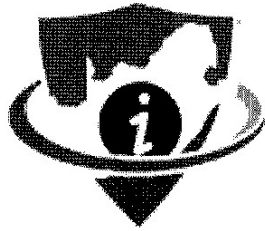


INFORMATION OFFICER'S REGISTRATION FORM

NOTE: *The personal information submitted herein shall be solely used for your registration with the Information Regulator ("Regulator").*

All the information submitted herein shall be used for the purpose stated above, as mandated by law. This Information may be disclosed to the public. The Regulator undertakes to ensure that appropriate security controls measures are implemented to protect all the information to be submitted in this document.

PART A INFORMATION OFFICER (IO)	
Full Name of IO	Kris Harmse
Designation	Attorney
Physical Address	30 Harley Street, Randburg, 2125
Postal Address	Private Bag 3073, Bromhof, 2154
Cellphone No.	0824184807
Landline No.	0119198220
Fax Number	0113264849
Direct Email Address	kris@gla.co.za
General Email Address	info@gla.co.za
<input checked="" type="checkbox"/>	<i>I consent to being contacted by the Regulator, requester or data subject at the above contact details or through my designated Deputy Information Officer(s), whose information is provided herein below.</i>



**INFORMATION
REGULATOR
(SOUTH AFRICA)**

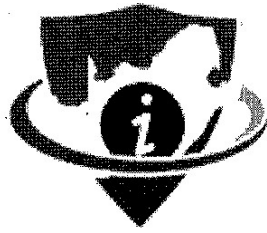
*Ensuring protection of your personal information
and effective access to information*

DEPUTY INFORMATION OFFICER'S REGISTRATION FORM

NOTE: The personal information submitted herein shall be solely used for your registration with the Information Regulator ("Regulator").

All the information submitted herein shall be used for the purpose stated above, as mandated by law. This information may be disclosed to the public. The Regulator undertakes to ensure that appropriate security controls measures are implemented to protect all the information to be submitted in this document.

PART B DEPUTY INFORMATION OFFICER (DIO)			
Physical Address	Name	Name	Name
	Santie Vosko	KURHULA MALULEKA	DORNECHA CARPEDE
	Direct Landline	Direct Landline	Direct Landline
	011 919 8058	011 919 8101	011 919 8137
	Cellphone Number	Cellphone Number	Cellphone Number
	082410 9507	0781296056	067 954 4837
	Email Address	Email Address	Email Address
	santie@gla.co.za	Kurhula@gla.co.za	dornecha@gla.co.za
Postal Address	Private bag 3073 Bromhof 2134		
Fax Number	/		
General Email Address			
I/we consent to being contacted by the Regulator, requester or data subject at the above contact details			
	✓	✓	✓



**INFORMATION
REGULATOR
(SOUTH AFRICA)**

*Ensuring protection of your personal information
and effective access to information*

DEPUTY INFORMATION OFFICER'S REGISTRATION FORM

NOTE: *The personal information submitted herein shall be solely used for your registration with the Information Regulator ("Regulator").*

All the information submitted herein shall be used for the purpose stated above, as mandated by law. This Information may be disclosed to the public. The Regulator undertakes to ensure that appropriate security controls measures are implemented to protect all the information to be submitted in this document.

PART B DEPUTY INFORMATION OFFICER (DIO)			
Physical Address	Name	Name	Name
	Jacco Komstra		
	Direct Landline	Direct Landline	Direct Landline
	011 919 8032		
	Cellphone Number	Cellphone Number	Cellphone Number
	072 357 6995		
	Email Address	Email Address	Email Address
Jacco@glr.co.za			
Postal Address			
Fax Number			
General Email Address			
I/we consent to being contacted by the Regulator, requester or data subject at the above contact details			
<input checked="" type="checkbox"/>			



**INFORMATION
REGULATOR
(SOUTH AFRICA)**

*Ensuring protection of your personal information
and effective access to information*

REGISTRATION CERTIFICATE

Registration Number: 14130/2021-2022/IRTT

This is to certify that **Kris Harmse** and **Kurhula Maluleke, Santie Vosloo, Jacco Kamstra, Dornecha Carpede** have been registered with the Information Regulator by **Groenewald Lubbe Incorporated** as the Information Officer and Deputy Information Officer respectively, in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 with effect from 28 May 2021.

A handwritten signature in black ink, appearing to be 'A. ...', is written over a horizontal line.

**Chief Executive Officer
INFORMATION REGULATOR**

NB: Please note that it is your responsibility to ensure that the particulars of an Information Officer and/or Deputy Information Officer(s) are correct and updated on an annual basis or as and when it becomes necessary.

Certificate issued by the Commissioner of Companies & Intellectual Property Commission on Tuesday, November 1, 2022 at 10:21



Companies and Intellectual
Property Commission

a member of the dti group

Disclosure Certificate: Companies and Close Corporations

Registration Number: 2003 / 011044 / 21

Enterprise Name: GL ATTORNEYS

ENTERPRISE INFORMATION

Registration Number: 2003 / 011044 / 21
 Enterprise Name: GL ATTORNEYS
 Registration Date: 16/05/2003
 Business Start Date: 16/05/2003
 Enterprise Type: Personal Liability Company
 Enterprise Status: In Business
 Compliance Notice Status: NONE
 Financial Year End: February
 TAX Number: 9691675145

Addresses	<u>POSTAL ADDRESS</u>	<u>ADDRESS OF REGISTERED OFFICE</u>
	P O BOX 3073 BROMHOFF BROMHOFF GAUTENG 2154	31 HARLY STREET RANDBURG RANDBURG GAUTENG 2125

ACTIVE MEMBERS / DIRECTORS

Surname and First Names	Type	ID Number / Date of Birth	Contrib. (R)	Interest (%)	Appoint. Date	Address
GROENEWALD, RUDOLPH HENDRIK	Director	7712115001086	0.00	0.00	01/06/2006	Postal: PO BOX 3073, BROMHOF, BROMHOF, GAUTENG, 2154 Residential: 13 RATCLIFFE DRIVE, MORNINGSIDE MANOR X1, SANDTON, GAUTENG, 2196
LUBBE, JACOB JOHANNES	Director	7401275007089	0.00	0.00	16/05/2003	Postal: P O BOX 3073, BROMHOF, BROMHOF, GAUTENG, 2154 Residential: 31 HOBDDAYS CRESCENT, SILVER LAKES, PRETORIA, GAUTENG, 0081
KALYAN, BHAVNA	Director	7907090099085	0.00	0.00	01/07/2015	Postal: P O BOX 9, FOURWAYS NORTH, JOHANNESBURG, GAUTENG, 2191 Residential: 33 SPARROW DRIVE, MAGALIESSIG, FOURWAYS, GAUTENG, 2191

AUDITOR DETAILS

Auditor Name	Type	Status	Appointment Date	Resignation Date	Email Address
MALAN DU PREEZ INGELYF	Auditor	Resign			

Profession Number: 903973A



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**Companies and Intellectual
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Registration Number: **2003 / 011044 / 21**
Enterprise Name: **GL ATTORNEYS**

HERMAN WESSELS CA (SA) Auditor Resign

Profession Number:

RAUTENBACH AUDITORS Auditor Current 2008-05-01 ACTIVE merle@rraccountants.co.za

Profession Number: 5005676

CHANGE SUMMARY

31/05/2005 Accounting Officer Change on 29/04/2005.
Change Record
Name : = MALAN DU PREEZ INGELYF
Status : = Resign

21/09/2009 Registered Address Change on 12/10/2009.
264 OAK AVENUE
GROUND FLOOR
RANDBURG

21/09/2009 Registered Address Change on 12/10/2009.
2125
264 OAK AVENUE
GROUND FLOOR
RANDBURG

02/06/2014 Annual Return completed on 02/06/2014.
Company / Close Corporation AR Filing - Web Services : Ref No. : 53220150

14/05/2015 SMS Notification that Annual Return is due was sent on 14/05/2015.
E-Mail send to JACOB JOHANNES LUBBE for 2015

04/06/2015 Annual Return completed on 04/06/2015.
Company / Close Corporation AR Filing - Web Services : Ref No. : 526872281

24/07/2015 Member Change on 24/07/2015.
Director BHAVNA KALYAN was added

02/05/2016 SMS Notification that Annual Return is due was sent on 02/05/2016.
E-Mail send to BHAVNA KALYAN for 2016

08/05/2017 Email Notification that Annual Return is due was sent on 08/05/2017.
E-Mail sent to JACOB JOHANNES LUBBE for 2017

31/05/2017 Annual Return completed on 31/05/2017.
Company / Close Corporation AR Filing - Web Services : Ref No. : 573288671

04/10/2017 Registered Address Change on 04/10/2017.
31 HARLY STREET RANDBURG RANDBURG GAUTENG2125

02/05/2018 Email Notification that Annual Return is due was sent on 02/05/2018.
E-Mail sent to JACOB JOHANNES LUBBE for 2018

01/05/2020 Email Notification that Annual Return is due was sent on 01/05/2020.
E-Mail sent to BHAVNA KALYAN for 2020

07/05/2021 Email Notification that Annual Return is due was sent on 07/05/2021.
E-Mail sent to BHAVNA KALYAN for 2021

09/05/2022 Email Notification that Annual Return is due was sent on 09/05/2022.
E-Mail sent to RUDOLPH HENDRIK GROENEWALD for 2022

09/05/2022 Email Notification that Annual Return is due was sent on 09/05/2022.
E-Mail sent to JACOB JOHANNES LUBBE for 2022



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Companies and Intellectual
Property Commission

a member of the dti group

Registration Number: 2003 / 011044 / 21
Enterprise Name: GL ATTORNEYS

17/05/2022 Member Change on 17/05/2022.
Director JACOB JOHANNES LUBBE - Change was made.
- Residential address changed from 41 ZINKWAZIE STREET to 31 HOBBDAYS CRESCENT.
- Residential address changed from HILLSIDE ESTATES to SILVER LAKES.
- Residential address changed from MORELETAPARK to PRETORIA.
- Business address changed from 41 ZINKWAZIE STREET to 31 HOBBDAYS CRESCENT.
- Business address changed from HILLSIDE ESTATES to SILVER LAKES.
- Business address changed from MORELETAPARK to PRETORIA.
- Email Changed from MERLE@RRACCOUNTANTS.CO.ZA to JACQUES@GLA.CO.ZA.

17/05/2022 Member Change on 17/05/2022.
Director RUDOLPH HENDRIK GROENEWALD - Change was made.
- Residential address changed from 20 ROCKLANDS to 13 RATCLIFFE DRIVE.
- Residential address changed from 54 MALUTI DRIVE to MORNINGSIDE MANOR X1.
- Residential address changed from NORTHCLIFF to SANDTON.
- Business address changed from 20 ROCKLANDS to 13 RATCLIFFE DRIVE.
- Business address changed from 54 MALUTI DRIVE to MORNINGSIDE MANOR X1.
- Business address changed from NORTHCLIFF to SANDTON.

17/05/2022 Member Change on 17/05/2022.
Director BHAVNA KALYAN - Change was made.
- Residential address changed from UNIT12 to 33 SPARROW DRIVE.
- Residential address changed from VILLAGE VIEW to MAGALIESSIG.
- Residential address changed from POLLOCK LANE FOURWAYS to FOURWAYS.
- Business address changed from UNIT12 to 33 SPARROW DRIVE.
- Business address changed from VILLAGE VIEW to MAGALIESSIG.
- Business address changed from POLLOCK LANE FOURWAYS to FOURWAYS.
- Postal address changed from P O BOX 13195 to P O BOX 9.
- Postal address changed from LAUDIUM to FOURWAYS NORTH.
- Postal address changed from PRETORIA to JOHANNESBURG.
- Email Changed from ICHHARAMB@GMAIL.COM to BHAVNA@GLA.CO.ZA.

08/08/2022 Member Change on 08/08/2022.
Director JACOB JOHANNES LUBBE - Change was made.
- Cell Number changed from 0724601882 to 0824931822.

01/11/2022 Name Change on 01/11/2022.
GLA ATTORNEYS

30/05/2005 Accounting Officer Change on 21/04/2005.
Change Record
Name : = MALAN DU PREEZ INGELYF
Status : = Resign

31/05/2005 Accounting Officer Change on 29/04/2005.
Add Record
Name : = HERMAN WESSELS CA (SA)
Status : = Current

06/06/2007 Member Change on 01/06/2006.
Surname=GROENEWALD
Full ForeNames=JURIE WYNAND
Id No=7511045083085
Status :RESIGNEDNature of Change=DIRECTOR RESIGNED

21/09/2009 Registered Address Change on 12/10/2009.
264 OAK AVENUE
GROUND FLOOR
RANDBURG
2125

21/09/2009 Registered Address Change on 12/10/2009.
264 OAK AVENUE
GROUND FLOOR
RANDBURG
2125

21/09/2009 Postal Address Change on 12/10/2009.



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Property Commission on Tuesday, November 1, 2022 at 10:21**



Companies and Intellectual
Property Commission
a member of the dti group

Disclosure Certificate: Companies and Close Corporations

Registration Number: **2003 / 011044 / 21**
Enterprise Name: **GL ATTORNEYS**

P O BOX 3073
BROMHOFF

2154

21/09/2009 Postal Address Change on 12/10/2009.
P O BOX 3073
BROMHOFF

2154

14/05/2015 SMS Notification that Annual Return is due was sent on 14/05/2015.
E-Mail sent to RUDOLPH HENDRIK GROENEWALD for 2015

24/07/2015 Member Change on 24/07/2015.
Director JACOB JOHANNES LUBBE details was Changed

02/05/2016 SMS Notification that Annual Return is due was sent on 02/05/2016.
E-Mail sent to JACOB JOHANNES LUBBE for 2016

06/07/2016 Annual Return completed on 06/07/2016.
Company / Close Corporation AR Filing - Web Services : Ref No. : 537813955

08/05/2017 Email Notification that Annual Return is due was sent on 08/05/2017.
E-Mail sent to RUDOLPH HENDRIK GROENEWALD for 2017

02/05/2018 Email Notification that Annual Return is due was sent on 02/05/2018.
E-Mail sent to RUDOLPH HENDRIK GROENEWALD for 2018

17/05/2018 Annual Return completed on 17/05/2018.
Company / Close Corporation AR Filing - Web Services : Ref No. : 5117260871

10/06/2019 Annual Return completed on 10/06/2019.
Company / Close Corporation AR Filing - Web Services : Ref No. : 5187285419

01/05/2020 Email Notification that Annual Return is due was sent on 01/05/2020.
E-Mail sent to JACOB JOHANNES LUBBE for 2020

07/05/2021 Email Notification that Annual Return is due was sent on 07/05/2021.
E-Mail sent to RUDOLPH HENDRIK GROENEWALD for 2021

08/08/2022 Member Change on 08/08/2022.
Director BHAVNA KALYAN - Change was made.

16/05/2003 Registration of CC/CO on 16/05/2003.

06/06/2007 Member Change on 01/06/2006.
Surname=GROENEWALD
Full ForeNames=RUDOLPH HENDRIK
Id No=7712115001086
Status :ACTIVENature of Change=ACTIVE

19/05/2008 Accounting Officer Change on 11/10/2005.
HERMAN WESSELS CA (SA) Reported Material Irregularity on : 1 October 2005 Status : Resign

19/05/2008 Accounting Officer Change on 01/05/2008.
P.O BOX 11937
ERASMUSKLOOF

0048

Status : Address Change

21/09/2009 Postal Address Change on 12/10/2009.



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Property Commission on Tuesday, November 1, 2022 at 10:21**



Companies and Intellectual
Property Commission

a member of the dti group

Disclosure Certificate: Companies and Close Corporations

Registration Number: 2003 / 011044 / 21

Enterprise Name: GL ATTORNEYS

P O BOX 3073
BROMHOFF

2154
21/09/2009 Postal Address Change on 12/10/2009.
P O BOX 3073
BROMHOFF

2154
24/07/2015 Member Change on 24/07/2015.
Director RUDOLPH HENDRIK GROENEWALD details was Changed

02/05/2016 SMS Notification that Annual Return is due was sent on 02/05/2016.
E-Mail sent to RUDOLPH HENDRIK GROENEWALD for 2016

08/05/2017 Email Notification that Annual Return is due was sent on 08/05/2017.
E-Mail sent to BHAVNA KALYAN for 2017

02/05/2018 Email Notification that Annual Return is due was sent on 02/05/2018.
E-Mail sent to BHAVNA KALYAN for 2018

01/05/2020 Email Notification that Annual Return is due was sent on 01/05/2020.
E-Mail sent to RUDOLPH HENDRIK GROENEWALD for 2020

21/10/2020 Annual Return completed on 21/10/2020.
Company / Close Corporation AR Filing - Web Services : Ref No. : 5315158878

07/05/2021 Email Notification that Annual Return is due was sent on 07/05/2021.
E-Mail sent to JACOB JOHANNES LUBBE for 2021

09/06/2021 Annual Return completed on 09/06/2021.
Company / Close Corporation AR Filing - Web Services : Ref No. : 5347617116

09/05/2022 Email Notification that Annual Return is due was sent on 09/05/2022.
E-Mail sent to BHAVNA KALYAN for 2022

09/06/2022 Annual Return completed on 09/06/2022.
Company / Close Corporation AR Filing - Web Services : Ref No. : 5367484385

08/08/2022 Member Change on 08/08/2022.
Director RUDOLPH HENDRIK GROENEWALD - Change was made.
- Cell Number changed from 0825800917 to 0836614966.

11/08/2022 Name Change on 11/08/2022.
GROENEWALD LUBBE

Physical Address

the dti Campus - Block F
77 Meintjies Street
Sunnyside 0001

Postal Address: Companies

P O Box 429
Pretoria
0001

Docex: 256

Web: www.cipc.co.za

Contact Centre: 086 100 2472 (CIPC)

Contact Centre (International): +27 12 394 9573





REGISTRATION CERTIFICATE

Registration Number: 0005238/2022-2023-IRRT/PR

This is to certify that **Kris Harmse** has been registered as the **Information Officer** and **Kurhula Maluleka, Dornecha Carpede , Santie Vosloo, Jacco Kamstra** have been registered as **Deputy Information Officers** with the Information Regulator by **GL Attorneys Incorporated** , in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 with effect from **03 November 2022**.


Chief Executive Officer
INFORMATION REGULATOR

NB: Please note that it is your responsibility to ensure that the particulars of an Information Officer and/or Deputy Information Officer(s) are correct and updated on an annual basis or as when it becomes necessary.