



PAIA MANUAL

Prepared in terms of section 51 of the
Promotion of Access to Information Act 2 of 2000 (as amended)
("PAIA")

Document Title	Promotion of Access to Information (PAIA) Manual	Version	2026/01
Author	Chané Williams	Date issued	
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Disclosure	For public use		

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1. DEFINITIONS

- 1.1 **"CEO"** means Chief Executive Officer;
- 1.2 **"Data Subject"** means the Person to whom Personal Information relates;
- 1.3 **"Deputy Information Officer"** or **"DIO"** means the person to whom any power or duty has been delegated by the Information Officer in regard to PAIA;
- 1.4 **"Super Group"** or **"Group"** means Super Group Limited and its subsidiary companies in the Republic;
- 1.5 **"Information Officer"** or **"IO"** means the person within the Group responsible for PAIA;
- 1.6 **"Information"** means any recorded information held by the Group in regard to the Requester, regardless of when it was created, its form, or its medium;
- 1.7 **"Manual"** means this PAIA Manual;
- 1.8 **"PAIA"** means the Promotion of Access to Information Act No. 2 of 2000 (as amended);
- 1.9 **"Person"** means a natural or juristic person;
- 1.10 **"Personal Information"** means "personal information" of the Requester, as such term is defined in POPIA;
- 1.11 **"POPIA"** means the Protection of Personal Information Act No.4 of 2013;
- 1.12 **"Regulations"** means the subordinate legislation promulgated under section 92 of PAIA;

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1.13 **“Regulator”** means the Information Regulator of South Africa;

1.14 **“Republic”** means the Republic of South Africa;

1.15 **“Requester”** means Persons seeking information to which they are entitled in terms of PAIA or POPIA.

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2. PURPOSE

This Manual has been compiled in compliance with the PAIA and POPIA to assist Requesters seeking Information in the possession of the Group.

This Manual will specifically assist a Requester to –

- 2.1 check the categories of Information held by the Group, which are available without the Requester having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to Information held by the Group in regard to the Requester by providing a description of the subjects on which the Group holds Information and the categories of Information held by the Group on the Requester;
- 2.3 know the description of the Information held by the Group in regard to the Requester which is available in accordance with any other legislation;
- 2.4 access the relevant contact details of the Information Officer and Deputy Information Officer who will assist the Requester with the Information it may wish to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Information Regulator and how to obtain access to it;
- 2.6 know if the Group will process Information, the purpose of such processing and the description of the categories of Data Subjects and of the Information or categories of Information relating thereto;
- 2.7 know the description of the categories of Data Subjects and of the Information or categories of Information relating thereto;
- 2.8 know the Recipients or categories of Recipients to whom the Personal Information may be supplied;
- 2.9 know if the Group has planned to transfer or process Personal Information outside the Republic and the Persons or categories of Persons to whom the Personal Information may be supplied; and

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2.10 know whether the Group has appropriate security measures to ensure the confidentiality, integrity and availability of the Information which is processed.

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3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION HELD BY THE GROUP

3.1. Information Officer

Name: Chané Williams
Information Officer
Tel: 011 523 4000
Email: chane.williams@sgits.co.za

3.2. Access to information requests

Email: sgpopia@supergrp.com

3.3. Super Group Limited Head Office

Postal Address: Private Bag X9973
Sandton
2146
Physical Address: 27 Impala Road
Chislehurst
Sandton
2128
Telephone: 011 523 4000
Website: www.supergroup.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised guide on how to use PAIA ("**Guide**"), in an easily comprehensible form and manner, as may reasonably be required by a Person who wishes to exercise any right contemplated in PAIA and POPIA.

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4.2. The Guide is available from the Regulator in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number, and, if available, electronic mail address of-

4.3.2.1 the information officer of every public body in the Republic, and

4.3.2.1 every deputy information officer of every public and private body in the Republic designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;

4.3.3. the manner and form of a request for-

4.3.3.1 access to a record of a public body contemplated in section 11³; and

4.3.3.2 access to a record of a private body contemplated in section 50⁴

¹ Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

² Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

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- 4.3.4. the assistance available from the information officer of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
- 4.3.6.1 an internal appeal; and
- 4.3.6.2 a complaint to the Regulator.
- 4.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public and private body, respectively;

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

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- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding the fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
- 4.5.1. upon request to the Information Officer or Deputy Information Officer
- 4.5.2. from the website of the Regulator (<https://info regulator.org.za/>).
- 4.6. A copy of the Guide is also available from the Regulator in the following official languages, for public inspection during normal office hours-
- 4.6.1. English; and
- 4.6.2. Afrikaans.

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that – “The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act”.

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5. CATEGORISATION OF RECORDS OF SUPERGROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

5.1. The records held on the Super Group website are automatically available and freely accessible to any Person. It is therefore not necessary to apply for access thereto in terms of PAIA. The Super Group website address is <https://www.supergroup.co.za/access-to-information-paia/>

Category	Description	Available on Website	Available upon request
Communications	News articles	X	
	Organizational structure chart	X	
	Corporate Social Investment Information	X	
Investor Relations	Financial Statements	X	
	Interim Results Presentation	X	
	Press Releases	X	
	Press Adverts	X	
	Webcasts	X	
	Integrated Reporting	X	
	Annual Results	X	

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	Interim Results	X	
	Calendar	X	
	SENS Announcements	X	
	Circulars	X	
	King IV Application Assessment	X	
	Notice of Annual General Meeting	X	
	Notice of General Meeting		
	Bondholder Information		
	Share Performance Information		
Legal	Website Terms and Conditions	X	
	Memorandum of Incorporation	X	
Policies	Super Group Code of Business Standards and Ethics	X	
	Super Group Supplier Code of Conduct and Ethics	X	
	Super Group Employment Equity and Workplace Diversity Policy	X	
	Super Group CSI and SED Policy	X	

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	Super Group Privacy Policy	X	
Registers	Transformation and B-BBEE Statistics	X	
Regulatory	B-BBEE Certificates	X	
	B-BBEE Commission Compliance Reports	X	

6. DESCRIPTION OF RECORDS OF SUPERGROUP WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

6.1. The Group is required to retain certain records in accordance with various legislation, amongst others-

- 6.1.1. Basic Conditions of Employment Act 75 of 1997;
- 6.1.2. Broad-Based Black Economic Empowerment Act 53 of 2003;
- 6.1.3. Companies Act 71 of 2008;
- 6.1.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- 6.1.5. Electronic Communications and Transactions Act 25 of 2002;
- 6.1.6. Employment Equity Act 55 of 1998;
- 6.1.7. Financial Intelligence Centre Act 38 of 2001;
- 6.1.8. Financial Markets Act 19 of 2012;
- 6.1.9. Income Tax Act 58 of 1962;
- 6.1.10. Labour Relations Act 66 of 1995;
- 6.1.11. National Credit Act 34 of 2005;
- 6.1.12. Occupational Health and Safety Act 85 of 1993;
- 6.1.13. Pension Funds Act 24 of 1956;
- 6.1.14. Skills Development Act 97 of 1998;
- 6.1.15. Skills Development Levies Act 9 of 1999;

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6.1.16. Unemployment Insurance Act 63 of 2001; and

6.1.17. Value Added Tax Act 89 of 1991.

6.2. Unless specifically available on Super Group's website or where specifically marked as freely available in terms of legislation, these records are not automatically available without lodging a PAIA request.

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY SUPER GROUP

Classification Number	Access	Classification
1	May be disclosed	Public access document
2	May not be disclosed	Request for, or after commencement of, criminal or civil proceedings [s7]
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information that belongs to the requester of that information [s61]
5	May not be disclosed	Unreasonable disclosure of personal information of natural person including a deceased individual [s63(1)]
6	May not be disclosed	Likely to harm the commercial or financial interests of third party [s64(a)(b)]
7	May not be disclosed	Likely to harm a third party in contract or other negotiations [s64(c)]
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement [s65]
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property [s66]

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10	May not be disclosed	Legally privileged document [s67]
11	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks [s64(3)]
12	May not be disclosed	Commercial information of private body [s68]
13	May not be disclosed	Likely to prejudice research and development information of Super Group Limited or a third party [s69]
14	May not be refused	Disclosure in public interest [s70]

Subjects on which the body holds records	Categories of records	Classification Number
Investor Relations	Current Product Information	3
	Public Corporate Records	1
	Media Releases	1
Group Health and Safety	Group OHS policy	1
	Health and safety records	4,10
	Environmental Records	11, 14
Human Resources Division	Employee Records	4, 5, 8, 9
	Employment Contracts	4, 5, 8
	Personnel Guidelines, Policies and Procedures	10, 13
	Employee Medical Records	4, 5, 8, 9

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Group Treasury and Audit	Financial Statements	1
	Financial and Tax Records (Company and Employees)	1, 8,10
	Asset Register	1
Group Legal and Company Secretarial Divisions	General Contract Documentation	6, 10, 13
	Company Guidelines, Policies and Procedures	10, 13
	Trade Marks	3
	Statutory Records	1
Group Marketing	Market Information	13
	Product Brochures	1
	Marketing and Product Strategies	13
	Product Sales Records	13
	Customer Information and Customer Database	5, 6, 9

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8. PROCESSING OF PERSONAL INFORMATION

8.1. Purpose of Processing Personal Information

8.1.1. Super Group will process Personal Information for the following purposes in compliance with applicable laws:

- a) to perform in terms of an agreement or intended agreement to which Super Group is a party;
- b) for any legitimate purposes related to the relationship between Super Group and its employees;
- c) to process credit applications (where relevant);
- d) to manage relationships between Super Group and any related third parties;
- e) to contact Data Subjects for marketing purposes, subject to the provisions of the Act;
- f) for internal business purposes, which includes:
 - i. administrative and operational tasks;
 - ii. monitoring our business, carrying out market and statistical research, and for business development;
 - iii. financial management, business audits and analyses, and fraud prevention; and
 - iv. compliance with legal requirements;
- g) to comply with reporting and other legal obligations in terms of contracts or the law;
- h) any other purpose if the law allows or requires it.

8.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto

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Categories of Data Subjects	Personal Information that may be processed
Shareholders	name, address, registration numbers or identity numbers, employment status and bank details
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race, any relevant health and medical information, disciplinary records,

8.3. The recipients or categories of Recipients to whom the Personal Information may be supplied

8.3.1. Super Group will not use or disclose Personal Information to any third party for any purpose other than the purpose for which the information was collected, without obtaining the necessary consent to do so or to the extent that legislation permits or requires.

8.3.2. Super Group will disclose Personal Information to regulatory authorities, accountants, auditors, lawyers or professional advisors if contractually required to or legally obligated to.

8.3.3. Personal Information may also be shared with third party service providers whose products or services are related to or connected with the products or services supplied to you by Super Group.

8.3.4. Super Group may transfer Personal Information to third parties if it sells any portion of its business or assets.

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8.3.5. Personal Information may be shared with Super Group's approved service providers or subcontractors when and if required to in order to fulfil its obligations to any Data Subject, however information will only be transferred to these third parties when and if all the required and relevant confidentiality and data security undertakings and legal requirements have been contractually accepted and agreed to in writing and in the event of a transfer of Personal Information to any third party, details of the transfer will only be retained for as long as is required to fulfil contractual obligations and / as allowed or required by law.

8.4. **Planned transborder flows of personal information**

Super Group may use cloud storage services, which could result in Data Subjects' Personal Information being transferred cross-border. Super Group will only transfer Personal Information to third parties in countries with adequate data protection laws or do so in terms of a written agreement with the recipient which imposes data protection requirements on that party as required by POPIA.

8.5. **Information Security Measures**

8.5.1. Super Group secures its data by maintaining reasonable, appropriate, and adequate technical and organizational measures to protect Personal information from loss, misuse, unauthorised access, disclosure, alteration and destruction. We contractually require any third parties to which Personal Information is transferred to do the same.

8.5.2. Super Group will take reasonable steps to keep Personal Information accurate, current, complete and reliable for its intended use.

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- 8.5.3. Super Group reviews its security controls and related processes on an ongoing basis to ensure that Personal Information is secure. Where there are reasonable grounds to believe that a Data Subject's Personal Information has been accessed or acquired by any unauthorised person, we notify the Information Regulator and the Data Subject in question as required.

9. AVAILABILITY OF THE MANUAL

- 9.1. A copy of the Manual is available-

- 9.1.1. on <https://www.supergroup.co.za/access-to-information-paia/>

- 9.1.2. at the head office of Super Group, via the Company Secretary, at:

27 Impala Road, Chislehurst
Johannesburg
South Africa

- 9.1.3. to any Person upon request and upon the payment of a reasonable prescribed fee; and

- 9.1.4. to the Information Regulator upon request.

- 9.2. A fee for a copy of the Manual, as contemplated in annexure B of the Regulations shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

- 10.1. The Information Officer will update this Manual on a regular basis.

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Issued by

Peter Mountford
Group CEO
Super Group Limited

11. VERSION CONTROL

Version	Description	Revision Date	Review Date	Reviewer Name
1	Initial Version	2021	2021	Bruce Van Niekerk
2	Updates to Initial Version	11 July 2025	July 2026	Chané Williams/Ronald Loewenthal
3	Update to POPIA Information Officer	11 September 2026	September 2027	Chané Williams

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