



POPIA & PAIA COMPLIANCE MANUAL

Compiled in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA) and the Promotion of Access to Information Act 2 of 2000 (PAIA)

1 INTRODUCTION AND PURPOSE

1.1 Purpose of this Manual

This manual has been compiled by G4 Mining and Civils (Pty) Ltd (hereinafter referred to as "the Company") in compliance with:

- Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA); and
- The Protection of Personal Information Act 4 of 2013 (POPIA) and its Conditions for Lawful Processing.

The manual serves to:

- Inform data subjects and requesters of the rights available to them under POPIA and PAIA;
- Describe the categories of personal information held by the Company and the purposes for which it is processed;
- Provide guidance on how to submit access requests or data subject requests;
- Demonstrate the Company's commitment to lawful, fair, and transparent processing of personal information.

1.2 Scope

This manual applies to all personal information processed by G4 Mining and Civils (Pty) Ltd in its capacity as a Responsible Party, whether in paper or electronic format, and regardless of where the information is stored.

1.3 Legislative Framework

Legislation	Relevance
POPIA (Act 4 of 2013)	Regulates the processing of personal information by public and private bodies
PAIA (Act 2 of 2000)	Governs access to information held by public and private bodies
The Regulator	Information Regulator (South Africa) established under POPIA s.39

1.4 Acronyms and Abbreviations

Term	Meaning
COIDA	Compensation for Occupational Injuries and Diseases Act 130 of 1993
DIO	Deputy Information Officer
Form C	The prescribed form for a request for access to a record of a private body under the PAIA Regulations
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	The Information Regulator (South Africa), established under section 39 of POPIA
Republic	The Republic of South Africa

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**G4 Mining and Civils (Pty) Ltd****Document Name**POPIA and PAIA
Compliance
Manual**Document Number**CORP COMM MAN -
2601**2 COMPANY AND INFORMATION OFFICER DETAILS****2.1 Responsible Party Details**

Organisation Name	G4 Mining and Civils (Pty) Ltd
Organisation Type	Private Company (Pty) Ltd
Sector	Construction
Physical Address	3 Kirschner Road, Benoni Agricultural Holdings, Benoni, 1501
Postal Address	Postnet Suite #39, Private Bag X01, Farrarmere, Benoni, 1518
Telephone	011 100 7126
Website	www.g4miningandcivils.co.za
Regulator Reg. No.	2025-013004
Regulator Reg. Date	11 June 2025

2.2 Information Officer

In terms of section 55 of POPIA, the head of the private body is designated as the Information Officer. The Company has registered its Information Officer and Deputy Information Officer with the Information Regulator as required.

Full Name	Quintin Cornelis Badenhorst
Designation	Information Officer
Appointment Date	28 June 2021
Email	quintin@g4miningandcivils.co.za
Telephone	011 100 7126
Physical Address	3 Kirschner Road, Benoni Agricultural Holdings, Benoni, 1501
Postal Address	Postnet Suite #39, Private Bag X01, Farrarmere, Benoni, 1518

2.3 Deputy Information Officer

Full Name	Siphokazi Valencia Nkula
Designation	Deputy Information Officer
Appointment Date	28 June 2021
Email	[Insert Deputy Information Officer email address]
Telephone	011 100 7126

All requests under PAIA and POPIA must be directed to the Information Officer at the details listed above.

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Documents sourced on the cloud server are controlled, however hard copies and documents saved on personal devices are not. Always refer to the cloud server location for the most recent revision of Management System documents.



3 PAIA | PROMOTION OF ACCESS TO INFORMATION

3.1 Right of Access to Information

Section 32 of the Constitution of the Republic of South Africa, 1996, provides that everyone has the right of access to any information held by the State, and any information held by another person that is required for the exercise or protection of any right.

PAIA gives effect to this constitutional right. Any person (natural or juristic) may submit a request for access to records held by the Company, subject to the grounds for refusal set out in Chapter 4 of PAIA.

3.2 Availability of this Manual

In accordance with section 51(3) of PAIA, this manual is available:

- At the Company's business premises during normal business hours;
- On the Company's website: www.g4miningandcivils.co.za;
- On the Information Regulator's website: www.inforegulator.org.za; and
- Upon written request to the Information Officer.

A copy of this manual may also be obtained by any person upon payment of the prescribed fee per A4-size photocopy, as contemplated in Annexure B of the PAIA Regulations.

3.3 The Guide on How to Use PAIA (PAIA Section 10)

The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available the Guide on how to use PAIA ("the 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. The Guide is available in each of the official languages and in braille.

The Guide contains, among other things, a description of: the objects of PAIA and POPIA; the contact details of the Information Officers and Deputy Information Officers of public and private bodies; the manner and form of a request for access to a record; the assistance available from Information Officers and from the Regulator in terms of PAIA and POPIA; the remedies available in law in respect of an act or failure to act in terms of PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, or an application to court; the provisions of sections 14 and 51 of PAIA requiring public and private bodies to compile a manual; the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records; the notices issued regarding fees payable in relation to requests for access; and the regulations made in terms of section 92 of PAIA.

Members of the public may inspect or make copies of the Guide at the offices of the Company and at the office of the Regulator during normal business hours. The Guide may also be obtained:

- Upon request from the Information Officer; and
- From the Information Regulator's website: www.inforegulator.org.za.

A copy of the Guide is available in English and isiZulu for public inspection at the Company's premises during normal office hours.

3.4 Categories of Records Held

The Company holds the following categories of records, which may be subject to access requests under PAIA:

Category	Examples
Human Resources	Employment contracts, payroll records, leave records, disciplinary records, performance records
Financial Records	Invoices, financial statements, tax records, banking records
Client / Contractor Records	Contracts, correspondence, project records, contact information
Health and Safety	Incident reports, medical surveillance records, COIDA records

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G4 Mining and Civils (Pty) Ltd

Document Name

POPIA and PAIA
Compliance
Manual

Document Number

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Compliance Records

Statutory returns, licences, permits, registration certificates

Corporate Records

MOI, resolutions, statutory registers, CIPC documents

3.5 Records Available Without a Request (PAIA Section 52)

The following categories of records are automatically available without a person having to submit a formal request for access in terms of PAIA:

Category of Records	Types of Records	How to Access
Public company information	Company profile, marketing brochures, and general contact details	Company website / upon request
Statutory compliance documents	This POPIA and PAIA Compliance Manual	Company website, business premises, and the Information Regulator

3.6 Records Held in Accordance with Other Legislation

Records are created, kept, and available in accordance with, among others, the following legislation:

Category of Records	Applicable Legislation
Memorandum of Incorporation, resolutions, statutory registers and CIPC records	Companies Act 71 of 2008
Employment contracts, payroll, leave and disciplinary records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995
Employment equity and skills development records	Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998
Tax, VAT, PAYE and financial records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
UIF records	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002
Health and safety records, incident reports and medical surveillance records	Occupational Health and Safety Act 85 of 1993; Compensation for Occupational Injuries and Diseases Act 130 of 1993
PAIA Manual	Promotion of Access to Information Act 2 of 2000

3.7 How to Submit a PAIA Access Request

A requester must submit a written request to the Information Officer using the prescribed Form C (as set out in the Regulations under PAIA).

The request must:

- Be in writing (Form C or equivalent written request);
- Provide sufficient detail to identify the record requested;
- Indicate the form of access required (inspection, copy, etc.);
- Specify the right being exercised or protected and how access to the record is required for that right;
- Include proof of identity of the requester;
- Be accompanied by the prescribed request fee of R50.00 (where applicable).

The Information Officer must respond within 30 days of receipt of the request. This period may be extended by a further 30 days in terms of section 57 of PAIA.

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3.8 Grounds for Refusal

The Company may refuse access to records on grounds set out in Chapter 4 of PAIA, including but not limited to:

- Protection of personal information of a third party (s.63);
- Records privileged from production in legal proceedings (s.67);
- Commercial information of a third party (s.64);
- Confidential information of a third party (s.65);
- Records that could endanger health or safety (s.66).

3.9 Fees

The following fees are prescribed under the PAIA Regulations:

Request fee (all private bodies)	R50.00
Reproduction — photocopy per A4 page	R1.10
Reproduction — printed copy per A4 page	R0.75
Reproduction — electronic copy (USB)	R70.00
Deposit (where reproduction cost exceeds R600)	One third of reproduction cost
Access fee — search and preparation (per hour)	R30.00 per hour (after first hour)

The Information Officer may waive fees if the requester demonstrates that they cannot afford them, or if the information is required in the public interest.

4 POPIA — PROTECTION OF PERSONAL INFORMATION

4.1 Overview

The Protection of Personal Information Act 4 of 2013 (POPIA) regulates the manner in which personal information may be processed. G4 Mining and Civils (Pty) Ltd, as a Responsible Party, is committed to processing personal information lawfully and in accordance with the eight Conditions for Lawful Processing set out in POPIA.

4.2 Definitions (POPIA s.1)

Term	Definition (POPIA s.1)
Personal Information	Information relating to an identifiable, living, natural person or juristic person, including but not limited to name, contact details, employment information, financial information, and biometric information.
Processing	Any operation concerning personal information, including collection, receipt, recording, storage, updating, distribution, merging, linking, restriction, degradation, erasure or destruction.
Responsible Party	A public or private body that determines the purpose of and means for processing personal information — in this case, G4 Mining and Civils (Pty) Ltd.
Data Subject	The natural or juristic person to whom personal information relates.
Operator	A person who processes personal information on behalf of a Responsible Party, in terms of a contract or mandate, without coming under the direct authority of that party.
Special Personal Information	Religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, and criminal behaviour.

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4.3 The Eight Conditions for Lawful Processing

Chapter 3 of POPIA sets out eight Conditions for Lawful Processing. The Company processes personal information in accordance with each of these conditions as follows:

Condition 1 — Accountability (s.8)

The Company, as Responsible Party, is responsible for ensuring compliance with POPIA. The Information Officer is accountable for overseeing compliance and has been registered with the Information Regulator.

Condition 2 — Processing Limitation (ss.9–12)

Personal information is only collected and processed where:

- The data subject has consented to the processing; or
- Processing is necessary to carry out actions for conclusion or performance of a contract; or
- Processing is necessary to comply with a legal obligation; or
- Processing is necessary for pursuing the legitimate interests of the Company or a third party.

The Company collects only the minimum personal information required for the stated purpose.

Condition 3 — Purpose Specification (ss.13–14)

Personal information is collected for specific, explicitly defined, and lawful purposes related to the Company's business activities in the construction sector. The information is not processed in a manner incompatible with those purposes.

Condition 4 — Further Processing Limitation (s.15)

Personal information will not be further processed in a manner that is incompatible with the original purpose for which it was collected, unless the data subject consents or another lawful basis exists.

Condition 5 — Information Quality (s.16)

The Company takes reasonable steps to ensure that personal information collected is complete, accurate, not misleading, and updated where necessary, having regard to the purpose for which it is processed.

Condition 6 — Openness (ss.17–18)

Data subjects are notified at the time of collection of their personal information of:

- The identity and address of the Responsible Party;
- The purpose for which the information is being collected;
- Whether supplying the information is voluntary or mandatory;
- The consequences of failure to provide the information;
- The right of access to and rectification of the information;
- The right to object to the processing of the information.

Condition 7 — Security Safeguards (ss.19–22)

The Company maintains appropriate, reasonable technical and organisational security measures to prevent loss, damage, unauthorised destruction, and unlawful access to personal information. In the event of a security compromise (data breach), the Company will:

- Notify the Information Regulator as soon as reasonably possible;
- Notify affected data subjects where the breach is likely to harm them.

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Condition 8 — Data Subject Participation (ss.23–25)

Data subjects have the right to:

- Request confirmation of whether the Company holds personal information about them;
- Request access to their personal information;
- Request correction or deletion of inaccurate, irrelevant, or excessive personal information;
- Object to the processing of their personal information on reasonable grounds.

5 CATEGORIES OF PERSONAL INFORMATION PROCESSED

5.1 Data Subjects and Personal Information Held

Data Subject	Personal Information Processed	Purpose
Employees	Identity number, contact details, banking details, payroll information, employment history, emergency contacts, disciplinary records, health information (medical surveillance)	Employment contract, statutory compliance, payroll, COIDA, health and safety
Job Applicants	CV, identity document, qualifications, references, contact details	Recruitment and selection
Clients / Customers	Name, contact details, company registration, banking details, contract information	Service delivery, invoicing, contract management
Contractors / Service Providers	Contact details, company registration, tax information, banking details	Procurement, contract management, payment
Site Visitors	Name, identity document, vehicle registration, purpose of visit	Access control and security

5.2 Special Personal Information (POPIA s.26)

The Company may process special personal information (health/medical information) of employees as required under the Mine Health and Safety Act and the Compensation for Occupational Injuries and Diseases Act. Such information is processed only where a lawful basis exists under section 27 of POPIA, and is subject to heightened security measures.

5.3 Information of Children (POPIA s.34)

The Company does not intentionally collect or process personal information of children (persons under 18 years of age) without the consent of a competent person, except where permitted by law.

6 THIRD PARTY PROCESSING AND OPERATORS

6.1 Operators

Where the Company engages third-party service providers (Operators) to process personal information on its behalf, the Company ensures that:

- A written contract (or operator agreement) is in place in terms of sections 20 and 21 of POPIA;
- The Operator processes personal information only with the knowledge and authorisation of the Company;
- The Operator implements appropriate security safeguards;
- The Operator does not process personal information for any purpose other than as directed by the Company.

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6.2 Recipients of Personal Information

Personal information may, where lawful and necessary, be supplied to the following recipients or categories of recipients:

Category of Personal Information	Recipients or Categories of Recipients
Employee tax, payroll and UIF information	South African Revenue Service (SARS); Department of Employment and Labour; Unemployment Insurance Fund
Medical surveillance and injury-on-duty information	Compensation Fund / Compensation Commissioner (COIDA); occupational health practitioners
Banking details for salaries and payments	Commercial banks and payroll service providers
Identity numbers, qualifications and references (verification purposes)	South African Police Service; South African Qualifications Authority; background screening service providers
Employee benefit information	Medical schemes, pension and provident fund administrators
Client and contractor information	Professional advisors (auditors, attorneys), insurers, and regulators where required by law

6.3 Transborder Flows of Personal Information (POPIA s.72)

Personal information will only be transferred to a third party in a foreign country if:

- The recipient country has equivalent protection laws to POPIA; or
- The data subject has consented to the transfer; or
- The transfer is necessary for the performance of a contract; or
- The transfer is for the benefit of the data subject and consent cannot reasonably be obtained.

The Company does not, in the ordinary course of its business, transfer personal information outside the Republic of South Africa. Where personal information is hosted with cloud-based service providers whose servers may be located outside the Republic, such transfers take place only in accordance with the conditions set out above.

7 DATA SUBJECT RIGHTS AND HOW TO EXERCISE THEM

7.1 Rights of Data Subjects under POPIA

Data subjects have the following rights under POPIA, which may be exercised by submitting a written request to the Information Officer:

Right	Description / POPIA Reference
Right to be notified (s.18)	To be informed when personal information is collected and the purpose thereof.
Right of access (s.23)	To request confirmation and access to personal information held about the data subject.
Right to correction (s.24)	To request correction, deletion, or destruction of inaccurate, irrelevant, outdated, incomplete, or misleading personal information.
Right to object (s.11(3))	To object, on reasonable grounds, to the processing of personal information.
Right to object to direct marketing (s.69)	To opt out of processing for direct marketing purposes at any time.
Right re: automated decision-making (s.71)	To not be subject to decisions based solely on automated processing which produce legal effects.
Right to lodge a complaint (s.74)	To submit a complaint to the Information Regulator regarding any infringement of POPIA rights.

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7.2 How to Submit a Data Subject Request

Data subjects may submit a written request to the Information Officer. The request should include:

- Full name and contact details of the data subject;
- Identity document number or other proof of identity;
- Description of the personal information being requested or the right being exercised;
- The manner in which the data subject would like the information provided.

The Company will respond within a reasonable period. Where access is refused, the data subject will be informed of the reasons and their right to complain to the Information Regulator.

7.3 Complaints to the Information Regulator

Data subjects who believe their rights under POPIA have been infringed may lodge a complaint with the Information Regulator of South Africa:

Organisation	Information Regulator (South Africa)
General Email	enquiries@info regulator.org.za
Telephone	010 023 5200
Complaints Email	POPIAComplaints@info regulator.org.za (POPIA) / PAIAComplaints@info regulator.org.za (PAIA)
Website	www.info regulator.org.za
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017

8 SECURITY AND DATA BREACH NOTIFICATION

8.1 Security Safeguards (POPIA s.19)

The Company has implemented appropriate, reasonable technical and organisational measures to safeguard the integrity and confidentiality of personal information in its possession or under its control. These measures are designed to prevent unauthorised access, damage, loss, or unlawful processing of personal information.

8.2 Data Breach Notification (POPIA s.22)

In the event that the Company reasonably believes that personal information in its possession has been accessed or acquired by an unauthorised person, the Company will:

- Notify the Information Regulator as soon as reasonably possible;
- Notify the affected data subjects, unless the identity of such persons cannot be established;
- Take reasonable steps to mitigate the harm caused by the breach.

Notification to data subjects may be delayed if law enforcement advises that notification will impede a criminal investigation.

9 RETENTION AND DESTRUCTION OF RECORDS

9.1 Retention

Personal information is retained for as long as is necessary to fulfil the purpose for which it was collected, or as required by applicable law. Minimum retention periods prescribed by relevant legislation (including the Labour Relations Act, Basic Conditions of Employment Act, Tax Administration Act, and COIDA) are observed.

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9.2 Destruction and Deletion

Once personal information is no longer required and the applicable retention period has expired, the Company will destroy, delete, or de-identify the personal information in a secure manner, in accordance with section 14 of POPIA.

10 REVIEW AND UPDATE OF THIS MANUAL

This manual will be reviewed at least annually, or whenever there is a material change in legislation, the Company's operations, or the categories of personal information processed. The Information Officer is responsible for ensuring this manual is kept current and available.

Compiled and reviewed		Approved	
Name and Surname	Jacinda van der Merwe	Name and Surname	Quintin Badenhorst
Date	15 June 2026	Date	15 June 2026
Signature		Signature	

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2601**ANNEXURE A — INFORMATION OFFICER REGISTRATION CERTIFICATE**

The following registration details confirm that G4 Mining and Civils (Pty) Ltd has complied with the requirement to register its Information Officer with the Information Regulator of South Africa in terms of section 55 of POPIA:

Organisation	G4 Mining and Civils (Pty) Ltd
Regulator Registration Number	2025-013004
Regulator Registration Date	11 June 2025
Information Officer	Quintin Cornelis Badenhorst
IO Appointment Date	28 June 2021
Deputy Information Officer	Siphokazi Valencia Nkula
Deputy IO Appointment Date	28 June 2021

The original Information Officer Registration Certificate issued by the Information Regulator is on file with the Information Officer and is available for inspection upon request.

ANNEXURE B — PAIA REQUEST FORM (FORM C) REFERENCE

In terms of the Regulations under PAIA, requesters must use the prescribed Form C to submit a request for access to records held by a private body.

The form is available from:

- The Information Regulator's website: www.inforegulator.org.za
- The Department of Justice and Constitutional Development: www.justice.gov.za
- The Company's Information Officer upon written request.

Completed Form C requests must be submitted to the Information Officer. The R50.00 request fee must accompany the request, unless waived by the Information Officer.

The Information Officer will acknowledge receipt and respond within 30 days as required by section 56 of PAIA.

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ORGANISATION DETAILS

Organisation Name	G4 MINING AND CIVILS
Regulator Registration Number	2025-013004
Regulator Registration Date	2025-06-11
Organisation Type	PRIVATE ORGANISATION
Private Organisation Type	PRIVATE COMPANY [(PTY) LTD]
Public Organisation Type	

INFORMATION OFFICER DETAILS

Full Name	Type	Appointment Date
BADENHORST, QUINTIN CORNELIS	Information Officer	2021-06-28
NKULA, SIPHOKAZI VALENCIA	Deputy Information Officer	2021-06-28



Mr. M Mosala

Chief Executive Officer: Information Regulator