



RCL FOODS GROUP

PAIA MANUAL

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

The RCL FOODS GROUP PAIA Manual applies in respect of RCL FOODS Ltd, Registration number: 1966/004972/06 and its subsidiaries, as private bodies, which as at the date of last revision of this Manual are:

- RCL Foods Sugar & Milling (Pty) Ltd, Registration number: 1947/026583/07
- RCL Group Services (Pty) Ltd, Registration number: 1957/004291/07
- Foodcorp (Pty) Ltd, Registration number: 2004/000743/07
- RCL Foods Treasury (Pty) Ltd, Registration number: 1983/002520/07
- Sunshine Bakery Holdings (Pty) Ltd, Registration number: 2018/083976/07
- Sunshine Bakery Durban (Pty) Ltd, Registration number: 2012/037400/07
- Scenic Route Trading 412 (Pty) Ltd, Registration number: 2016/469485/07
- Sunshine IP (Pty) Ltd, Registration number: 2016/417047/07
- Sunshine Bakery Operations (Pty) Ltd, Registration number: 2012/066482/07

(which will be collectively referred to as "**RCL FOODS GROUP**")

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LIST OF ACRONYMS AND ABBREVIATIONS

“CEO”	Chief Executive Officer
“DIO”	Deputy Information Officer;
“IO”	Information Officer;
“Minister”	Minister of Justice and Correctional Services;
“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as amended);
“POPIA”	Protection of Personal Information Act No. 4 of 2013;
“Regulator”	Information Regulator; and
“Republic”	Republic of South Africa

1. PURPOSE OF PAIA MANUAL

THIS PAIA Manual is useful for the public to-

- 1.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 1.3. know the description of the records of the body which are available in accordance with any other legislation;
- 1.4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6. know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9. know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 1.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

2. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF RCL FOODS GROUP

2.1. Information Officer

Name:	Deena Naicker
Email address:	POPIA@rclfoods.com

2.2. National office

Postal address:	PO Box 2734, Westway Office Park, Westville, KwaZulu-Natal, 3635
Physical address:	Ten The Boulevard, Westway Office Park, Westville, KwaZulu-Natal, 3629
Telephone:	+27 031 242 8600
Email address:	POPIA@rclfoods.com
Website:	https://rclfoods.com/

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

- 3.1. 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.
- 3.2. The Guide is available in each of the official languages and in braille.
- 3.3. The aforesaid Guide contains the description of-
 - 3.3.1. the objects of PAIA and POPIA;
 - 3.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - (i) the Information Officer of every public body, and

- (ii) every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 3.3.3. the manner and form of a request for-
 - (i) access to a record of a public body contemplated in section 11³; and
 - (ii) access to a record of a private body contemplated in section 50⁴;
- 3.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 3.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 3.3.6. 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-
 - (i) an internal appeal;
 - (ii) a complaint to the Regulator (using the portal available at <https://inforegulator.org.za/complaints/> or by submitting Form 5 to PAIAComplaints@inforegulator.org.za); and
 - (iii) 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;
- 3.3.7. 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;

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
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

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.

- 3.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 3.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 3.3.10. the regulations made in terms of section 92¹¹.
- 3.4. 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 (situated at Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191, during normal working hours).
- 3.5. The Guide can also be obtained-
 - 3.5.1. upon request to the Information Officer at enquiries@inforegulator.org.za or 0800 017 160 / 010 023 5200; or
 - 3.5.2. from the website of the Regulator (<https://inforegulator.org.za/>)
- 3.6. A copy of the **Guide** is also available in the following **two official languages**, for public inspection during normal office hours-
 - 3.6.1. English; and
 - 3.6.2. IsiZulu

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.

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 request 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.”*

4. CATEGORIES OF RECORDS OF RCL FOODS GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Type of records	Available on the website	Available upon request
Corporate, investor and regulatory information	Group members and background, brands, impact, stories, who we are, Annual reports, including corporate governance, sustainability and remuneration reports, and documents such as B-BBEE certificate and compliance report, and SENS announcements shareholder communications, notices of meetings, and investor information	✓	✓
Financial information	Group Annual financial statements, interim and final financial results announcements and reports.	✓	✓
Marketing	Press releases, news, updates, speeches and marketing material, competition and promotions, social initiatives, and YouTube videos	✓	✓
Policies & procedures	PAIA Manual, Guidelines and prescribed forms, terms of use, Employment Equity policy statement, competition and promotional terms and conditions per initiative	✓	✓
Products & services	Product ranges, brand information, nutritional guidelines and recipes	✓	✓
Careers and employment	Job vacancies, graduate programmes, and bursary opportunities	✓	✓

5. DESCRIPTION OF THE RECORDS OF RCL FOODS GROUP WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of records	Applicable legislation
Human resources records (employee and vendor information, contracts, payroll, leave, UIF, disciplinary and grievance records, etc.)	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998; Skills Development Act 97 of 1998; Unemployment Insurance Act 63 of 2001
Pension records	Pension Funds Act 24 of 1956; Tax on Retirement Funds Act 38 of 1996
Medical aid records	Medical Schemes Act 131 of 1998
Statutory records (MOI, shareholder registers, AGM Minutes, PAIA manual, statutory returns)	Companies Act 71 of 2008; Constitution of the Republic of South Africa, 1996
Administrative records (internal policies, correspondence, operational manuals, Share registration records)	Companies Act 71 of 2008
Annual financial statements, management accounts, tax records, and budgets	Companies Act 71 of 2008; Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value Added Tax Act 89 of 1991; Insolvency Act 24 of 1936
Credit records, Insurance records, title deeds, lease agreements, asset registers	National Credit Act 34 of 2005; Companies Act 71 of 2008; Insurance Act 18 of 2017
Promotions and competition records	Consumer Protection Act 68 of 2008; Competition Act 89 of 1998
Health and safety records	Occupational Health and Safety Act 85 of 1993; Compensation for Occupational Injuries and Diseases Act 130 of 1993
Marketing records (campaigns, advertising materials)	Consumer Protection Act 68 of 2008; Electronic Communications and Transactions Act 25 of 2002; Regulation of Interception of Communications and Provision of

	Communication Related Information Act 70 of 2002
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6. DESCRIPTION OF THE SUBJECTS ON WHICH RCL FOODS GROUP HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE RCL FOODS GROUP

Subjects on which the body holds records	Categories of records
Human resources	Employee files, Vendor files, contracts, payroll records, leave records, performance appraisals, training and skills development plans, employment equity reports, disciplinary records, interview notes, and medical records
Finance	Customer credit facility applications and assessments, supplier payment records, invoices, statements, receipts, budget reports, annual financial statements and audit reports, tax records, expense and reimbursement claims, internal control and financial policy documents, records of financial transactions and journal entries, investor details and reports
Health and safety	Occupational health and safety policies, incident reports, and compliance certificates
Products and services	Product specifications, marketing material, customer information, supplier and distributor agreements, food safety and quality control records, payment details where necessary, and competition and promotional participant information
IT systems	IT policies, system security protocols, access control records, software agreements, and cybersecurity incident logs
Legal and compliance	Contracts and agreements, insurance records, litigation files,

	regulatory submissions, B-BBEE certificates
Property and assets	Title deeds, lease agreements, asset registers, intellectual property records (trademarks, patents)
Procurement and supply chain	Supplier contracts and information, tender documents, logistics and distribution records

7. PROCESSING OF PERSONAL INFORMATION

7.1. Purpose of processing personal information

Where RCL FOODS GROUP acts as the responsible party, we will only process a data subject's personal information when the purpose complies with the legal justifications in POPIA.

RCL FOODS GROUP may process personal information to:

- provide its products and services, manage orders, invoicing, payment collection, and manage customer queries or complaints;
- manage onboarding, vet and pay suppliers, vendors and service providers;
- manage business operations, including sales, employee benefits, planning, marketing, promotions, and competitions;
- provide and monitor access to company systems, websites, applications, and premises;
- comply with laws and regulations, maintain company records, and communicate with stakeholders;
- detect, prevent, and investigate fraud, conflicts of interest, policy breaches, or other misconduct;
- recruit staff, conduct background or credit checks, manage payroll, and other employment matters;
- conduct internal and external audits, manage risks, and ensure proper governance and reporting;
- provide a central and shared service arrangement between Group members; or
- communicate with customers, vendors, suppliers, service providers, and stakeholders.

7.2. Description of the categories of data subjects and of the information or categories of information relating thereto

Categories of data subjects	Personal information that may be processed
Employees	<p>Full name and title, identity and passport number, contact details, marital status, nationality, banking details (name of bank, branch name and code, type of account, account number, account holder name), secondary education (and a copy of the certificate), tax reference number, particulars of dependents, children, adopted children or stepchildren still totally dependent (under the age of 21 years of age), next of kin or emergency contact (name, date of birth, relationship to you, contact number), University completed degree, diploma or other qualification or course (and a copy of the certificate), disclosure (criminal offence conviction and details, FMCG Company employment and details), interest or relationship to the Group companies' customers, suppliers or competitors and any of their associates, gender, race, foreign national, date of citizenship, disability status and nature of disability, life assured information, benefit selection (spouse, children or immediate family details, parents' details, or extended family details), beneficiary details in the event of death of the principal life assured, financial advisor or broker's details, plan type and start date, dependant or nominee details and relationship to member, previous medical scheme details, portfolio or cover options, and supporting documents.</p>
Customers (Business partners)	<p>Full business name or legal entity name, names and contact details of authorised representatives, registration or company number, tax number or VAT number, identification number of principals, shareholders or directors, banking and payment account information, credit references and credit history, device identifiers, URLs and IP addresses when accessing digital portals, records of orders, transaction history and communications,</p>

	trade references, and documents required for onboarding such as proof of registration, tax clearance and business licences, credit facility details.
Consumers	Name, surname, contact details, age or date of birth (where required for eligibility), social media handle (if entry submitted online), photographs, video or audio recordings submitted for competitions or promotions, proof of purchase (for prize validation), and any communications or correspondence
Suppliers, service providers, consultants, contractors, vendors	Full name, entity name, contact details, tax number, registration number, identity or passport number, bank account details, vendor active and inactive date, transaction history, agreements, communications and correspondence, performance records, supporting documents such as compliance records or health and safety certificates
Directors	Full name, contact details, identity or passport number, qualifications
Job applicants	Full name, contact details, identity or passport number, gender, message preferences, South African Citizenship status, nationality, province and country, race, disability status and nature of disability, highest qualification completed, driver's license status and type, work experience, educational qualifications, certified copies of identity document, CV, full academic transcripts, proof of qualifications, work permit, passport or visa
Website users	Device identifiers, URLs, IP addresses, full name or user identity, contact details, geographic location, communications, form submissions, and messages (also see Job applicants above, as that information is collected through the careers portal on the website)

7.3. The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or categories of recipients to whom the personal information may be supplied
Identity number and names (for criminal checks)	Screening and verification service provider
Qualifications (for qualification verifications)	South African Qualifications Authority (SAQA)
Beneficiary details and medical history of employee and dependants (for employee benefits)	Medical aid, pension and provident fund schemes
Director and company secretary information, which includes full names, identity numbers, and contact details	Companies and Intellectual Property Commission (CIPC)
Employment history and references.	Previous employers or nominated references (for verification purposes)
Tax numbers, income and payroll information.	South African Revenue Service (SARS)
Company registration documents (CIPC registration, share certificates, MOI), audited financial statements, employee information (including race, gender, and occupational levels) and skills development records.	Department of Trade, Industry and Competition (and the B-BBEE Commission)
Name and surname, identity number and country of issue, contact number, tax number and email address. <i>(This is necessary to issue a tax certificate to enable employees to claim the donation for tax purposes when they do payroll giving.)</i>	Do More Foundation
Employee information: Full name, identity number, date of birth, contact details, banking details,	Group external auditors

<p>joining or leaving date, tax number, job title, employment type, location, and gender.</p> <p>Vendor information:</p> <p>Vendor name, registration number, tax identification number, contact details, banking details, active or inactive date, vendor type and transaction history.</p>	
<p>General information regarding the company and its capital. Information regarding the director and company secretary details, which includes full names, identity numbers, qualifications, and contact details.</p>	<p>Johannesburg Stock Exchange (JSE) Issuer Regulation Division</p>

RCL FOODS GROUP operates a central and shared services platform where Group members process personal Information on behalf of each other, only where necessary. A data processing agreement will be concluded with the members to ensure that the personal information is safeguarded.

7.4. Planned transborder flows of personal information

We may transfer personal information to trusted third parties in other countries for services or storage. When doing so, RCL FOODS GROUP will follow the requirements of POPIA to ensure that the information remains protected.

7.5. General description of Information Security Measures to be implemented by the RCL FOODS GROUP to ensure the confidentiality, integrity and availability of the information

We take the safety, security, and confidentiality of personal information seriously. We use reasonable technical, administrative, and physical safeguards to protect the information from unauthorised access, misuse, or disclosure.

When we use digital or online technologies, we ensure that the service providers are trusted and apply the same level of security we do. We also ensure that the technology is secure and that proper safeguards are in place before we store or share information. We regularly review and update our security measures.

8. AVAILABILITY OF THE MANUAL

8.1. A copy of the manual is available –

8.1.1. On our website;

8.1.2. At our national office for public inspection during normal business hours;

8.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and

8.1.4. to the Information Regulator upon request.

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

9. UPDATING OF THE MANUAL

We will keep this manual updated.

Date of Adoption: June 2021

Last updated: March 2026

Version 3