



AVEADE GROUP (PROPRIETARY) LIMITED

Registration Number: 2021/394181/07

Aveade Group respect your right of access to information. As required by law in terms of section 51 of Promotion to Access of Information Act of 2000 (PAIA), this document will help you exercise your right without any issues.

PAIA MANUAL

In terms of Section 51 of Promotion of Access to Information Act No. 2 of 2000

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1. INTRODUCTION

We are Aveade Group (Pty) Ltd (Aveade), a technology company that operate online marketplace, Aveade Seller Portal Software as a Service, logistics and delivery services for products and services listed on our digital platforms. This is our access to information manual. This manual may be amended from time to time and the latest version will be made public as soon as any amendments have been finalized.

The purpose of this document is to help you access our information in terms of section 51 of the PAIA Act which help you to know what types of information and records we hold so that you can request access to the information and records we hold that relate to you.

2. COMPANY DETAILS

Company Name:	Aveade Group (Pty) Ltd
Registration Number:	2021/394181/07
Physical Address:	28 Saddle Drive, Woodmead, Sandton 2191
Contact Details	Hasane Mathe (CEO)
Appointed Information Officer	Glad Nokeri (Information Officer)
Tel:	081 824 9322
Email	Information-Officer@aveade.com
Aveade contact email:	info@aveade.com
Websites:	www.aveade.com

3. GUIDANCE ON HOW TO USE PAIA

Any person wishing to exercise a right contemplated in PAIA, can obtain a guide in any South African official languages from the South African Human Rights Commission (“SAHRC”). The contact details of the SAHRC are as follows:

Body: South African Human Rights Commission
Tel: 011 484 8300
Email: PAIA@sahrc.org.za
Physical Address: 29 Princess of Wales
Terrance Corner York and St Andrews Street
Parktown
Johannesburg

Postal Address: 2193
PAIA Unit, Research and Documentation Department
Private Bag 2700
Houghton
Johannesburg
2041

Website: www.sahrc.org.za

4. GUIDANCE ON HOW TO USE POPIA

You may contact Information Regulator if you would like further guidance about information relating to PAIA. The Information Regulator will provide further guidance per PAIA which will help you exercise any right under PAIA. This PAIA Manual is published on Aveade Group's website www.aveadegroup.com and www.aveade.com where you can easily download and access this manual on any device that can be used to access the internet and support to access our website, or you can alternatively request this PAIA by contacting our information office or director by sending email to legal@aveade.com.

1.1.1 The details of Information Regulator are listed below:

Body: Information Regulator
Tel: 011 023 5200
Email: Enquiries@infoeregulator.org.za
Physical Address: JD House, 27 Stiemens Street,
Braamfontein, Johannesburg,
2001

Postal Address: P.O Box 31533, Braamfontein,
Johannesburg
2017

Website: www.infoeregulator.org.za

5. RECORDS WE HOLD

We hold various information records including company records, business records, financial records, insurance records, personnel records, policies, agreements or contracts, regulatory documents, published information, customer or user information, reference materials, and operational information.

5.1. COMPANY RECORDS

Company records are records relating to incorporation and administration of our company. Which can be accessed and made available on the Companies and Intellectual Property Commission (CIPC). Our company records relating to incorporation, can be accessed direct on CIPC’s website, which is public and allow anyone to access certain information that relates to company incorporation in South Africa.

COMPANY RECORDS	HOW TO ACCESS
Registration Certificate	CIPC
Memorandum of Incorporation	CIPC
Documents of Incorporation	CIPC
Minutes of Board of Director’s meetings	Request
Written Resolutions	Request
Appointment, Directors, Auditor, Secretary, Public officer, or other officers	Website
Register, certificates, and other statutory registers	Request
Debt securities, Trust	Request
Shareholders, directors,	Request
Shareholders’ agreement	Request

5.2. BUSINESS RECORDS

Business records is business information documents that relate to business trading, economic value and other business activities our company engage or have engaged in.

BUSINESS RECORDS	HOW TO ACCESS
Operational records and reports	Request
Databases	Request
Product records	Request
Profiles of subsidiary companies or parent company	Request
Service record	Request
Internal correspondence	Request

Associates, partners, suppliers, Service providers	Request
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5.3. FINANCIAL RECORDS

Financial records are information that is related to our finances. This record relate to all transactions related to our business.

FINANCIAL RECORD	HOW TO ACCESS
Financial Statements	Request
Tax Returns	Request
Other Taxations of the company	Request
Accounting records	Request
Bank statements	Request
Electronic banking records	Request
Assets	Request
Rental agreements	Request
Invoices	Request
Financial agreements	Request

5.4. INSURANCE RECORDS

Insurance Records are records that are related to our insurable assets.

INSURANCE RECORDS	HOW TO ACCESS
Insurance policies	Request
Register of all immovable property owned by the company	Request
Income Tax Records	Request
PAYE Records	Request
Corporate Tax Records	Request
Customs Tax	Request
Employees Income Tax Records	Request
Levies	Request
UIF	Request

5.5. PERSONNEL RECORDS

Personnel records are records related to any person who works or have worked with us, whether service is rendered to us, or behalf of us and have received or receives or is entitled to receive remuneration, including our employees, contractors, partners, associates, and other personnel.

PERSONNEL RECORDS	HOW TO ACCESS
List of Employees	Request
Employee Personal Information	Request
Employee Employment Contract	Request
Employee Policies and Procedures	Request
Employment Equity Plan	Request
Pension Funds Records	Request
Leave Records	Request
Internal Evolutions	Request
Disciplinary Records	Request
Disciplinary Codes	Request
Training Records	Request
Operating Manuals	Request
Personal Records provided by Personnel	Request
Other Statutory Records	Request
Related Correspondence	Request

5.6. POLICIES AND DIRECTIVES

Policies and directives include both internal and external documents.

POLICIES AND DIRECTIVES	HOW CAN I ACCESS
Internal relating to employees and the company	Request
External relating to clients and other third parties	Request
Information technology system and documents	Request

5.7. AGREEMENTS OR CONTRACTS

Agreements or contracts include the documents themselves and all related documents.

AGREEMENTS OR CONTRACTS	HOW CAN I ACCESS
Website and Mobile Application agreement	Available on the website
Contracts concluded with customers	Request
Letters of Intent, MOUs	Request
Third-party contracts and agreements	Request
Office Management Contracts	Request
Supplier Contracts	Request
Tender Contracts	Request
Communication records	Request

List of Sellers, Service Provider, Dealers, Advertiser, Agent	Available on the website
Contract concluded with customers	Available on the website
Logistics, Transport, or Delivery Service Agreement	Request
Service terms and conditions	Available on the website
Privacy policy	Available on the website
Warranty, return, refund policies	Available on the website

5.8. REGULATORY DOCUMENTS

Regulatory documents include any documents required by the government authority to comply with any laws.

REGULATORY DOCUMENTS	HOW CAN I ACCESS
Permits	Request
Licenses	Request
Authorities	Request
Environmental Approvals	Request
Local Authority Approval	Request
Incidence records and statistics	Request
Risk management system	Request
Operational Risk Review Report	Request

5.9. PUBLISHED INFORMATION

Published information includes any documents, listed on our digital products including website, Mobile Application and our software.

PUBLISHED INFORMATION	HOW CAN I ACCESS
External newsletters and circulars	Available
Internal newsletters and circulars	Request
Relationships with Third-Parties	Request
Information published by Third-Party	Request
Removed, disabled, Unavailable listing	Request
Delete, remove, hide Reviews	Request

5.10. CUSTOMER INFORMATION

Customer information includes any information about anyone that we provide goods or services to, including our customers, users, leads, or prospects.

CUSTOMER INFORMATION	HOW TO ACCESS
Account	Request

Customer details	Request
Contact details	Request
Communication with customer	Request
Sales, invoice records	Request
Delivery records	Request
Transactional Information	Request
Marketing records	Request
Addresses	Request
Payment methods, history, wallets	Request
Orders, Return records	Request
Verification information	Request

5.11. REFERENCE MATERIALS

Reference materials include any sources of information that we contribute to.

REFERENCE MATERIALS	HOW TO ACCESS
Product / Service Information, Specification	Mobile App and website
Product / Service Descriptions	Mobile App and website
Books	Request
Newsletters and Journals articles	Request
Press release, and blog	Website
Newspaper articles	Request

6. INFORMATION WE HOLD TO COMPLY WITH THE LAW

Records are stored according to the legislation as is applicable to Aveade Group, which include but may not be limited to the following legislation

REFERENCE	ACT
Basic Conditions of Employment Act	No. 75 of 1997
Broad-Based Black Economic Empowerment Act	No. 53 of 2003
Civil Proceedings Evidence Act	No. 25 of 1965
Companies Act	No. 61 of 1973
Companies Act	No. 71 of 2008
Compensation for Occupational Injuries and Diseases Act	No. 130 of 1993
Consumer Protection Act	No. 68 of 2008
Copyright Act	No. 98 of 1978
Electronic Communications and Transactions Act	No. 25 of 2002
Employment Equity Act	No. 55 of 1998
Finance Act	No. 2 of 2007

Financial Advisory and Intermediary Service Act	No. 37 of 2002
Income Tax Act	No. 58 of 1962
Labour Relations Act	No. 66 of 1995
Occupational Health and Safety Act	No. 85 of 1993
Pension Funds Act	No. 24 of 1956
Promotion of Access to Information Act	No. 2 of 2000
Protection of Personal Information Act	No. 4 of 2013
Regulation of Interception of Communications and Provision of Communications Related Information Act	No. 70 of 2002
Skills Development Act	No. 97 of 1998
Skills Development Levies Act	No. 9 of 1999
Trade Marks Act	No. 194 of 1993
Unemployment Insurance Act	No. 63 of 2001
Value Added Tax Act	No. 89 of 1991

7. HOW TO REQUEST ACCESS

To access these information, we have authorized and designated our information officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of PAIA. This information guides you which information is made available for you without contacting us and which information is not available for you, which you will have to request from us.

To request access to a record, please complete Form 2 which is available from the website of the Information Regulator at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>.

Submit the completed form to our Information Officer together with the relevant fees (details appear at Annexure B to the PAIA Regulations, available here: <https://inforegulator.org.za/wp-content/uploads/2020/07/20210827-gg45057gon757-PAIAreulations.pdf> at our information officer's email address, or physical address in terms of our details provided above.

Kindly ensure that the completed form:

- Has enough information for the information officer to identify you, the requested records, and which form of access you require;
- Specifies your email address, postal address (where applicable), or fax number (where applicable);
- Describes the right that you seek to exercise or protect;
- Explains why you need the requested record to exercise or protect that right;
- Provides any other way you would like to be informed of our decision other than in writing; and
- Provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form we may:

- Reject the request due to lack of procedural compliance;
- Refuse it if you do not provide sufficient information; or

- Delay it

You may request information by completing a request for access form and submitting it to our information officer together with a request fee.

8. WHO MAY REQUEST INFORMATION

PAIA provides that a requester is only entitled to access a record required for the exercise or protection of a right. To exercise your right to access of information in terms of PAIA, a request for access to record, where the requester has satisfied the Information Officer that the record is required to exercise or protect a right, will be considered. A requester may act in different capacities in making a request for record. This will influence the amount to be charged when a request has been lodged.

Requesters may make a request as:

- A personal requester who requests a record about him/herself;
- An authorized representative requester who requests a record on behalf of someone else with that person's consent and where it is required for the protection of that person's legal right;
- A third party requester who requests a record about someone else with that person's consent and where it is required for the protection of that person's legal rights; and
- **A public body who may request a record if;**
 - It fulfils the requirements of procedural compliance;
 - The record is required for the exercise or protection of a right; and
 - No grounds for refusal exist.

9. GROUNDS FOR REFUSAL

We may have to refuse you access to certain records in terms of PAIA to protect:

- Someone else's privacy;
- Another company's commercial information and personal information;
- Someone else's confidential information and personal information;
- The safety of individuals and property;
- Records privileged from production in legal proceedings; or
- Research information

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record. The affidavit will be emailed, post, delivered or can be collected from one of the address close to you.

We may have to refuse you access to a record to protect the rights of others.

10. HOW WE WILL GIVE YOU ACCESS

We will evaluate and consider all requests to us in terms of PAIA. If we approve your request for access to our records, we will decide how to provide access to you, unless you have specified and asked for access in a specific manner. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA and access have been granted.

11. HOW MUCH IT WILL COST YOU

You must pay us a request fee as required by law when submitting a request for access to information. The prescribed fees are as set out in the Fee Schedule which is available from Annexure B of the PAIA Regulations at this link: <https://infoeregulator.org.za/wp-content/uploads/2020/07/20210827-gg45057gon757-PAIAreulations.pdf>

You must pay us the fees before we will hand over any information. You may have to pay a further access fee if we grant the request for that has exceeded the prescribed hours to search and prepare the record for disclosure

12. WHERE TO MAKE PAYMENT

To make payments, kindly use your name and surname as reference, failure to do so will result in delays, or not being able to identify your payment. Our banking details are available on our website for the public to access, you can also call our financial department or our officers to provide you with our banking details as prior starting with the application process.

13. FEE STRUCTURE

Please note the below fees are minimum chargers and are not VAT inclusive.

NO	ITEM	AMOUNT
1	For every photocopy of an A4-size page or part thereof	R1,10
2	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0,75
3	For a copy in a computer-readable form on –	R7,50
	(i) Stiffy disc	R7,50
	(ii) Compact disc	R70,00
	(iii) USB or any other external storage device	R70,00
4	(i) For a transcription of visual images, for an A4-size or part thereof	R40,00
	(ii) For a copy of visual images	R60,00
5	(i) For a transcription of an audio record, for an A4-size page or part thereof	R20,00

	(ii)	For a copy of visual images	R30,00
6	(i)	The request fee payable by a requester, other than a person requester	R50,00
	(i)	To search for the record disclosure	R30,00/Hour

14. HOW WE PROCESS AND PROTECT PERSONAL INFORMATION

We process the personal information of various categories of people or data subjects for various purposes as set out in this clause.

14.1. CATEGORIES OF DATA SUBJECTS

We process the personal information relating to:

- Customers or users;
- Prospects or Leads;
- Employees;
- Recruiters and medical practitioners providing services related to employees;
- Contractors, Affiliates, Vendors, Suppliers;
- Children and their guardians;
- Debtors and creditors;
- Dealers, Agents;
- Companies, Organisations; Institutions;
- Locations, Addresses;
- Directors and shareholders.

15. HOW WE PROTECT YOUR INFORMATION

We use a variety of security measures designed, under a risk-based approach, to ensure the confidentiality of your information. However, as a set forth in the applicable terms of use for each digital property, we cannot and do not guarantee the security of the information transmitted to us. Per our security measures, we always recommend use of strong password, biometrics, and avoid sharing account information. We will never ask you to share with us your password or any security access information related to your account.

16. PURPOSES FOR PROCESSING OF PERSONAL INFORMATION

PAIA not only requires us to inform you when we use your personal information as part of our processing, but also notify you of the purpose of which process it, to ensure we deliver on our commitment to you.

17. OPERATIONAL PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION

The below is a list of activities where we use your personal information and if you were to object to this use (unless we do not have another lawful ground for processing), we would not be able to deliver the service or product, or our delivery would be negatively impacted.

Accordingly, the operational purpose of these activities is to:

- Keep you updated with the progress of your order regarding the product and/or services.
- Provide service that uses information about where you are when using your equipment such as address and location information, subject to you accepting the location user setting.
- Contact you with messages about changes to your products and/or services.
- Contact you in the event of a query and respond to any questions or concerns you may have about using our digital products and services.
- Protect our digital platforms, and manage the volume of users, orders, information, texts, or other usable products and services. For example, we identify peak periods of use for us to ensure that our digital platforms can manage and handle the volume at the time when is used, we use these information to understand how you use our digital platforms, and services. It allow us to develop more appropriate and relevant products, features and designs that improve your user experience when using our products/or services, as well as personalize the products and service we offer to you.
- We use these personal information during research and statistical analysis to monitor how you use our digital platforms, and services. To be able to conduct market research and perform statistics analyses of your behaviour during the use of our products and services, which help us to know your interest in and use of various areas of our digital products. We share specific information across our different business units and departments for processing to service you more efficiently such as, but not limited to, orders, accounts, payments, queries, competitions, loyalty programme, deliveries, communications, and personalized services.
- Prevent and detect cyberattack, fraud, and access to information about privacy. Recover debts, or locate you for service rendered or collection of monies owed to us.
- Send you promotional materials, personalised offers or details by SMS, e-mail, electronic communication.
- To inform you about other companies that we share information with in order to be able to provide services you purchased/or sold from or through our digital products.

18. REGULATORY PURPOSES FOR PROCESSING YOUR PERSONAL INFORMATION

We may process your personal information for regulatory purposes. These are pieces of legislation that have been enacted which require us by law to process personal information and failure to do so will place us in violation of that law. For example, we need to comply with Regulation of POPI Act No. 4 OF 2013 which requires us to protect access to personal information.

19. CATEGORIES OF PERSONAL INFORMATION

POPIA makes a clear distinction between the two categories of personal information. The first category is personal information (PI). This type of information relates to both natural and juristic persons. Examples of personal information is your name, surname, identification number, date of birth, passport number, mobile phone number, banking account details, email address, etc. Insofar as juristic entities are concerned, this include confidential personal information that are not made public in ordinary circumstances.

The second category of personal information is special personal information (SPI). Examples of special personal information is your physical or mental health status, criminal status, religion, biometrics, disability, sexual orientation, etc.

We apply various security control during the collection and processing of both personal information and special personal information and make every reasonable effort to ensure that it is not lost, stolen, changed, or compromised in anyway.

20. THIRD-PARTY DISCLOSURE

We may disclose your personal information to third parties who help us serve, or carry out our functions to fulfil our obligations to our customers, users or in relation to our commercial activities. Where we disclose your personal information for the purpose of it was disclosed for.

To this end, we have agreements in place with these third parties to ensure this and to ensure an adequate level of security and confidentiality for your personal information.

We share the following information with third-party

- Contactors, vendors, suppliers
- Agents, dealers
- Operators, banks, Payment providers
- Internet Service Providers for hosting our platforms so you can be able to access them

21. INTERNATIONAL OR CROSS-BORDER INFORMATION TRANSFER

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa with accordance to:

1. Recipient country can offer such data an “adequate level” of protection. This means that its data privacy law must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
2. Data Subject consents to the transfer of their Personal Information;
3. Transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
4. Transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interest of the Data Subject; or

5. Transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

When making authorized disclosures or transfers of Personal Information in terms of section 72 of POPIA, Personal Information may be disclosed to recipients located in countries which do not offer a level of protection for those data as high as the level of protection as South Africa.

As an internet service provider through our Software as a Service, and authorised importer and exporter of goods in terms of logistics services and relationship with international partner logistics partners and technology partners, we may share your information with our logistics international logistics partners to be able to render you service which is related to the use of our digital platform, for example a seller request us to ship order from another country direct you, we will share your information with our international logistics partner to move your order as requested and agreed by you and the seller. We will only share minimum information such as names, address, and contact details only.

22. SECURITY

We have measure in place that help prevent and secure our data by maintaining reasonable measures to protect personal information from loss, misuses, unauthorized access, disclosure, alteration and destruction. We take reasonable steps to keep personal information secure, accurate, current, complete and reliable for its intended use. We have security features that help protect your information and is also important that you do not share your Aveade account login details with anymore, we recommend you use 2 Factor Verification settings, Password of mixed words, numbers, and symbols with minimum length of 6 for strong security to protect your account. To comply and make sure your information and concerns with related to security are well answered, we don't see your password but we can access your account for assistance and when you require information, or when we remotely support you.

23. OTHER PRESCRIBED INFORMATION

The Information Regulator no the Minister of Justice and Constitutional Development have made any regulations prescribing other information that needs to appear in this manual.

24. APPLICABLE TIME PEIODS

Aveade Group will inform the requester within 30 days after the receipt of the request of its decision whether or not to grant the request. Aveade Group will evaluate the reason and take into account whether the request will not violate the right of others, cause harm, damage, or prevent the law from taking its course.

The 30-day period is effective from the date the payment has cleared into Aveade Group business account. The 30-days period may be extended by further period of not more than another 30 days if the request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of Aveade Group.

25. PAIA FORMS

To download and access PAIA forms, Please visit the website of the Information Regulator using the following link: <https://info regulator.org.za/paia-forms/> for all PAIA related forms to exercise your rights:

FORM	USE
Form 01	Request for a Guide from the Information Regulator
Form 01	Request for a copy of the Guide from the Information Officer of Aveade Group
Form 2	Request for access to a record from Aveade Group
Form 04	Internal appeal form
Form 05	Compliant form
Form 13	PAIA request for compliance assessment form

26. AVAILABILITY OF THIS MANUAL

This manual is available in English and is made available for the public to access on our website, and at our own offices.

27. AVAILABILITY OF THE GUIDE ON HOW TO USE PAIA

The Information Regulator has, in terms of section 10(1) of PAIA updated and made available the revised Guide on how to use PAIA in a much easy and clarified form, for everyone who may require the information and wish to exercise any right contemplated in PAIA.

Members of the public can inspect or make copies of the Guide from Aveade Group during normal business working hours which is from 8:00AM – 16:00PM from Monday – Friday. The guide is available in manual and digital form.