Halfway Group Holdings (Pty) Ltd		DOC NO REV DATE	COSEC01 01/01/2022
		ISSUED	01/01/2022
SECTION	COMPANY SECRETARIAT		
SUB-SEC	PAIA MANUAL		
SUBJECT	INFORMATION MANUAL FO	OR HALFWAY GROUP HO	

INFORMATION MANUAL FOR HALFWAY GROUP HOLDINGS (PTY) LTD

in terms of

THE PROMOTION OF ACCESS TO INFORMATION ACT

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	"CEO"	Chief Executive Officer;
1.2	"DIO"	Deputy Information Officer;
1.3	"Halfway"	Shall mean Halfway Group Holdings (Pty) Ltd (registration number: 2015/274007/07), a private body incorporated in South Africa with subsidiaries and associates as set out in Annexure C;
1.4	"10"	Information Officer;
1.5	"Minister"	Minister of Justice and Correctional Services;
1.6	"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.7	"POPIA"	Protection of Personal Information Act No.4 of 2013;
1.8	"Regulator"	Information Regulator; and
1.9	"Republic"	Republic of South Africa.

2. PURPOSE OF PAIA MANUAL

The purpose of this PAIA Manual is to assist you with the following:

- 2.1 Provide you with the categories of records held by the various operating entities within the Halfway Group which are available without you having to submit a formal PAIA request;
- 2.2 Enable you to have a sufficient understanding of how to make a request for access to a record of any operating entity within the Halfway Group, by providing a description of the subjects on which an entity within the Halfway Group holds records and the categories of records held on each subject;
- 2.3 Provide you with a description of the records held by the various entities within the Halfway Group which are available in accordance with legislation;
- 2.4 Provide you with a description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.5 To assist you to understand, that where the entities within the Halfway Group processes 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.
- 2.6 Provide you with a description of the categories of data subjects and the information or categories of information relating thereto;
- Provide you with the recipients or categories of recipients to whom the personal information may be supplied;
- 2.8 To make you aware of instances where an entity within the Halfway Group 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

- 2.9 To make you aware of appropriate security measures the entities within the Halfway Group has in place to ensure the confidentiality, integrity and availability of the personal information which is to be processed.
- 2.10 This Policy must be read with the Halfway Group Privacy Policy and in particular the details of the Information Officers and Deputy Information Officers will apply to this Policy.

3. SCOPE

The Scope of this policy include entities within the Halfway Group as provided for in Annexure C. Please refer to the Halfway Group Privacy Policy for specific contact details for each operating entity and their respective Information and Deputy Information Officers.

The following entities are expressly excluded from the ambit of this policy:

- Entities in which the Halfway Group holds a minority interest; and
- Entities which are dormant.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION ABOUT THE HALFWAY GROUP

4.1. The Chief Executive Officer for Halfway Group Holdings (Pty) Ltd is Mr. J G Baikie.

4.2. HEAD OFFICE

Postal address	Physical address	Contact De	tails
PO Box 1585	31 Stevens Road	Tel no:	(039) 978 7500
Scottburgh	Park Rynie	Fax no:	(086) 694 2311
4180	4182	E-mail:	As set out in the Privacy Policy
	7/2	Website:	www.halfwaygroup.co.za

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

- 5.1. 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.
- 5.2. The Guide is available in each of the official languages and in braille.
- 5.3. The aforesaid Guide contains the description of-
 - 5.3.1 the objects of PAIA and POPIA;

- the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 5.3.2.1. the Information Officer of every public body, and
 - 5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²:
- 5.3.3. the manner and form of a request for-
 - 5.3.3.1 access to a record of a public body contemplated in section 11³; and
 - 5.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 5.3.6. 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-
 - 5.3.6.1. an internal appeal;
 - 5.3.6.2. a complaint to the Regulator; and
 - 5.3.6.3. 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;
- 5.3.7. 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;

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 compiles 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.

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;

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.

- the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 5.3.10. the regulations made in terms of section 9211.
- 5.4. 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 business hours.
- 5.5. The Guide can also be obtained-
 - upon request to the Information Officer of any of the entities within the Halfway
 Group;
 - from the website of the Regulator (https://www.justice.gov.za/inforeg/).
- A copy of this Guide is also available in the following two official languages namely English and IsiZulu, for public inspection during office hours.

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

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."

6. AVAILABILITY OF RECORDS

Entities within the Halfway Group maintain the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

Category:	Record:	Availability:	Purpose:	Data Subject:
Public	Public Product Information	Freely Available	Convey Public Information	Organisation
Affairs	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
Regulatory &	FSP license	Freely Available	Statutory Requirement	Organisation
Administrative	Promotion of Access to Information	Freely Available	Statutory Requirement	Organisation
	Website & Email Disclaimers	Freely Available	Statutory Requirement	Organisation
	Privacy Policy	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Zanro Brokers (Pty) Ltd / Astor Financial Services (Pty) Ltd
	Complaint's resolution Policy	Freely Available	Statutory Requirement	Zanro Brokers (Pty) Ltd / Asto Financial Services (Pty) Ltd
	Suspicious and unusual transactions Policy	PAIA Request	Statutory Requirement	Zanro Brokers (Pty) Ltd / Asto Financial Services (Pty) Ltd
	Health & Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal correspondence (e- mails/memos)	PAIA Request	Internal Communications	Employees
	Insurance Policies held by organization	PAIA Request	Risk Management	Organisation
Human	Employment Applications	PAIA Request	Internal Referencing	Employees
Resources	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees

	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Seta Records	PAIA Request	Statutory Requirement	Employees
	Distiplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
	Training Records	PAIA Request	Internal Referencing	Employees
	Training Manual	PAIA Request	Internal Referencing	Organisation
	Financial Statements	PAIA Request	Statutory Requirement	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
Financial	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation
Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisement policy	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product / Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
Client /	Customer / Client Database	PAIA Request	Internal Referencing	Customers
Customer	Customer / Client agreements	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
Third Party	Intermediary agreements	PAIA Request	Contractual Agreement	Zanro Brokers (Pty) Ltd / Astor Financial Services (Pty) Ltd
	Binder agreements	PAIA Request	Risk Management	Zanro Brokers (Pty) Ltd / Asto Financial Services (Pty)
	Referral agreements	PAIA Request	Contractual Agreement	Zanro Brokers (Pty) Ltd / Asto Financial Services (Pty)
	Outsource agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Contractual agreement	Third party

Lease agreements	PAIA Request	Contractual agreement	Third party
Service Provider agreements	PAIA Request	Contractual agreement	Third party

7. STATUTORY RECORDS

STATUTORY RECORDS	
Administrative Adjudication of Road Traffic Offences	
Basic Conditions of Employment Act	
Broad Based Black Economic Empowerment Act	
Companies Act	
Competition Act	
Compensation for Occupational Injuries and Diseases Act	
Constitution of the Republic of South Africa	
Copyright Act	
Disaster Management Act	
Electronic Communications Act	
Electronic Communications and Transactions Act	
Employment Equity Act	
Financial Advisory and Intermediary Services Act	
Financial Sector Regulation Act	
Health and Safety Regulations	
Income Tax Act	
Insurance Act	
Labour Relations Act	
National Minimum Wage Act	
National Payment System Act	
National Qualifications Framework Act	
Occupational Health and Safety Act	
Policyholder Protections Rules 2017 Short Term Insurance	
Prescription Amendment Act	
Promotion of Equality and Prevention of Unfair Discrimination Act	
Promotion of Access to Information Amendment Act	
Protected Disclosures Act	
Protection of Personal Information Act	

Rental Housing Act		
Skills Development Act		
Skills Development Levies Act		
Short Term Insurance Act		
Fax Administration Act		
Unemployment Insurance Act		
Unemployment Insurance Contributions Act		
Value-Added Tax Act		

8. DESCRIPTION OF THE CATEGORIES OF DATA SUBJECTS AND THE INFORMATION OR CATEGORIES OF INFORMATION RELATING THERETO

Below is a description of all data subjects and the description of the nature or category of personal information to be processed.

Category of Data Subjects	Types of Information processed	
Individuals (customer, policyholders etc.)	Name, surname, South African identity number or other identifying number (e.g., passport), date of birth, age, marital status, citizenship, telephone numbers, email address, physical and postal addresses, drivers' licence, income tax number, employment information, occupation, financial information (e.g., remuneration), banking information including account numbers, claims and payment history, FICA documentation.	
Entities (Corporate Customers, Companies, Close Corporations, Trusts and Partnerships)	Entity name, registration number, tax-related information, contact details for representatives, FICA documentation, beneficial owners' personal information (as for Individuals).	
Directors, Members, Partners & Trustees	Identity numbers, names, physical and postal address, contact numbers, emai address & FICA documentation.	
Employees (potential employees, new recruitments, independent contractors)	Name, surname, South African identity number or other identifying number (e.g., passport number), contact details, physical and postal address, date of birth, age, marital status, race, disability, information, employment history, criminal background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information, drivers' licence, health information, details related to employee performance, disciplinary procedure information.	
	May also include the personal information of children / minors, if they are listed as beneficiaries or dependants.	

Service providers (including outsourced or hosted services, auditors, etc.) Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses, contact details.

9. THE CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED.

Below is a description of recipients to whom your personal information may be shared:

- Service providers who are involved in the delivery of products or services to you. We have agreements in place
 to ensure that they comply with the privacy requirements as required by the Protection of Personal
 Information Act.
- Entities within the Group. We only do this, in instances where we have received your express consent to do so.
- Insurers, intermediaries, administrators, and Underwriting Managers.
- · Provident Funds and their Trustees and Principal Officers.
- Medical aid companies.
- · Recruitment organisations that may collect information on our behalf.
- Regulators and Law Enforcement Agencies.
- Motor Licencing Bureau.
- Original Equipment Manufacturers (OEMs).
- · Banks and other financing Institutions.
- The South African Revenue Service (SARS).
- Auditors and External Compliance Practices

10. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

- 10.1 Entities within the Halfway Group make use of hosted services provided by third parties. These operations may be hosted in various countries resulting in the transfer of personal information.
- 10.2 In general, entities within the Halfway Group try as far as possible to ensure that these service providers are located in jurisdictions with strong data protection legislation, such as the European Union or the United Kingdom. Where this is not possible, data protection requirements are enforced by means of contractual agreement.
- GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY THE RESPONSIBLE PARTY TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF THE INFORMATION.
- 11.1 Entities within the Halfway Group take every reasonable precaution to protect your personal information (including information about your activities) from theft, unauthorized access, and disruption of services.
- 11.2 Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our website, data centers, systems, and other assets for security vulnerabilities.
- 11.3 Our security policies and procedures cover:
 - Physical and environmental security controls.
 - Network security.

- Protection from viruses and other malware.
- Restricted access and password control to personal information.
- Secure communications (email encryption).
- Secure remote working (VPN access only to the networks).
- Acceptable usage of IT equipment and mobile devices (Exit and entry procedures for staff).
- Clean Desk Policy.
- Lockable cabinets for physical storage of records with restricted access.
- IT disaster recovery and backup procedures.
- Training and awareness initiatives.
- Retention and disposal of information (Shred it).
- · Cyber Security Incident Response.
- · Active monitoring and review of the IT and business environment.
- 11.4 When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

12 REQUEST FOR INFORMATION PROCEDURE

- 12.1 To facilitate the processing of your information request, kindly complete the form marked Annexure A. The form must be submitted to the Information Officer or Deputy Information Officer whose details appear in the Halfway Group Privacy Policy.
- 12.2 The Information Officer or Deputy Information Officer will notify you that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure B for a full breakdown of fees payable.
- 12.3 Please be advised that PAIA provides a number of grounds on which a request for access to information may be refused. These grounds mainly comprise instances where:
 - the privacy and interests of other individuals are protected.
 - where such records are already otherwise publicly available.
 - instances where public interest are not served.
 - the mandatory protection of commercial information of a third party.
 - the mandatory protection of certain confidential information of a third party.
- 12.4 When completing the form below please:
 - indicate the identity of the person seeking access to the information.
 - provide sufficient particulars to enable the Information or Deputy Information Officer to identify the information requested.
 - specify the format in which the information is required.
 - indicate the contact details of the person requiring the information.
 - indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right.
 - where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed.
 - if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

13 AVAILABILITY OF THE MANUAL

- 13.1. A copy of the Manual is available-
 - On the various operating entities websites as well as on www.halfwaygroup.co.za;
 - · at each entity's physical place of business for public inspection during normal business hours;
 - · to any person upon request and upon the payment of a reasonable prescribed fee; and
 - · to the Information Regulator upon request.
- A fee for a copy of the Manual, as contemplated in Annexure B, shall be payable per each A4-size photocopy made.

14. POLICY REVIEW

This policy will be reviewed on an ad hoc basis if there are any changes to the business operations or legislation that warrant such change. Alternatively, the policy will be reviewed once annually.

Name of the policy	Version NO	Reason for change	Author	Approver	Approver	Effective date
PAIA MANUAL	CoSEC01V1	Amendment to Policy	Craig Humphreys	George Baikie	tak-1	1 January 2022

ANNEXURE A: REQUEST FOR INFORMATION PROCEDURE

A. Particulars of Private Body	
The Head:	in in
B. Particulars of person requesting access to the record	
(i) The particulars of the person who requests access to the record must be recorded below	100-
(II) Furnish an address and/or fax number in the Republic to which information must be sent	
(iii) Proof of the capacity in which the request is made, if applicable, must be attached	
Full names & surname:	
Identity number:	
Postal address:	
Fax number:	
Telephone number:	
Email address:	
Capacity:	
C. Particulars of person on whose behalf request is made	
This section must be completed ONLY if a request for information is made on behalf of another person	
Full names & surname:	
Identity number:	
D. Particulars of Record	
(i) Provide full particulars of the record to which access is requested, including the reference number if that is known to you	
(ii) If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages	
Description of record:	
Reference number:	
Any further particulars:	
E. Fees	
(i) A request for access to a record, other than a record containing personal information about yourself, will be processed only after	a reques
fee has been paid	
(ii) You will be notified of the amount required to be paid as the request fee	
(iii) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search	h for an
prepare a record	

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(iv) If you qualify for exemption of the payment of any fee, please state the reason therefor

Reason for exemption:

F. Form of access to record
If you are prevented by a disability to read, view or listen to the record in the form of access provided hereunder, please state your disability
and indicate in which form the record is required
Disability:
Form in which required:
Mark the appropriate box with an "X"
(i) Your indication as to the required form of access depends on the form in which the record is available
(ii) Access in the form requested may be refused in certain circumstances, in such a case you will be informed of access will be granted in
another form
(iii) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested
1) If the record is in written or printed form:
copy of record
inspection of record
2) If record consists of visual images:
 view the images
copy of the images
transcription of the images
3) If the record consists of recorded words or information which can be reproduced in sound:
listen to the soundtrack
 transcription of the soundtrack
4) If the record is held on computer or in an electronic or machine-readable form:
printed copy of record
 copy in computer readable form
Please indicate the preferred method of delivery
By hand
Email
Post
■ Fax
G. Particulars of right to be exercised or protected
If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all additional folios.
Indicate which right is to be exercised or protected:
mulate which right is to be exercised of protected.
Explain why the record requested is required for the exercise or protection of the aforementioned right:
and and the states and denotes in an electrical and business and in the next management of the same

n. Notice of decision regarding the request for access	
You will be notified in writing whether your request has been approve	d / denied. If you wish to be informed thereof in another manner, please
specify the manner and provide the necessary particulars to enable co	empliance with your request
How would you prefer to be informed of the decision regarding your r	request for access to the record?

1. Signature page

Signed at:

Date:

Signature of Requester / Person on whose behalf request is made:

ANNEXURE B: PRESCRIBED FEES

No.	Description	Fee
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00
3.	Printed copy of an A4 size page	R2.00
4.	For a copy in a computer-readable form on: i. Flash drive (to be provided by requester) ii. Compact disc: - If provided by requestor - If provided to the requestor	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend
6.	Copy of visual images	on quotation from Service provider.
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: i. Flash drive (to be provided by requester) ii. Compact disc: - If provided by requestor - If provided to the requestor	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request ito items 2-8.

11. Postage, e-mail or any other electronic transfer

Actual expense, if any.

ANNEXURE C: OPERATING ENTITIES INCORPORATED INTO THIS MANUAL

Please refer to the Halfway Group Privacy Policy for the names and contact details of the information and Deputy Information Officers.

LEGAL ENTITY NAME	TRADING AS	REGISTRATION NUMBER
30-34 Rackview (Pty) Ltd		2015/378191/07
4 Wheel Drive Motor Distributors (Pty) Ltd	Halfway Toyota Honeydew / Hino Honeydew	1984/010172/07
4 Wheel Drive Property Holdings (Pty) Ltd		2015/371475/07
Alfred County Auto (Pty) Ltd	Halfway Ford Port Shepstone / Halfway Ford Waterfall / Halfway Ford Goodwood / Halfway Ford Kuils River	2015/363372/07
Aston Development (Pty) Ltd		2017/420483/07
Aston Financial Services (Pty) Ltd		2013/233809/07
Big Bus Transport (Pty) Ltd		2018/319793/07
Bodyshack (Pty) Ltd		2013/043964/07
Gillock Motors (Pty) Ltd	Halfway Toyota Malanda / BP Malanda	2013/043724/07
Gold Reef Mators (Pty) Ltd	Halfway Toyota Howick / Engen Howick	2012/106066/07
Gotya Protection Services (Pty) Ltd	Gotya Protection Services	2018/530053/07
Group Red Sky (Pty) Ltd	Hey Halfway (online vehicle sales)	2014/000574/07
Halfway Auto Holdings (Pty) Ltd	Mark	2015/270886/07
Halfway Fleet Services KZN (Pty) Ltd		2017/061833/07
Halfway Group Holdings (Pty) Ltd		2015/274007/07
Halfway Motor Holdings (Pty) Ltd		2015/270810/07
Halfway Service Station (Pty) Ltd	Halfway Toyota Park Rynie / Caltex Park Rynie	2013/043993/07
Halfway Truck Centre (Pty) Ltd	Hino Shelley Beach	2013/044027/07
Halfway Vehicle Hire (Pty) Ltd		2015/380432/07
Hambanathi Vehicle Rental (Pty) Ltd		2013/071632/07
IGB Properties (Pty) Ltd		2013/043940/07
JMPH Finance Corporation (Pty) Ltd		1960/004165/07
Locross (George) (Pty) Ltd	Halfway Toyota George	1991/006380/07
Murray and Daddy (Pty) Ltd	Halfway Hyundai Port Shepstone	2017/012272/07
New Age Logistics (Pty) Ltd	Mark White Nissan Amanzimtoti	2015/383688/07
Oluble Cleaning Services (Pty) Ltd	The Fairles	2015/381459/07
Parkhill Panelbeaters CC		1995/048872/23
Randtip 91 (Pty) Ltd		2018/641047/07
Red Wall Motors Port Shepstone (Pty) Ltd	Halfway Mazda Port Shepstone	2015/380470/07
Renu Finance (Pty) Ltd		2012/171422/07
Renu Holdings (Pty) Ltd		2008/028623/07
Rockview Property Holdings (Pty) Ltd		2015/270661/07
RV Centre CC	Honeydew Panel Shop	1995/051294/23
Sanarth (Pty) Ltd		1956/001403/07
Scottburgh Motors (Pty) Ltd		2015/377671/07
Scottfin Financial Services (Pty) Ltd		2013/189233/07
Scottfin Holdings (Pty) Ltd		2015/270954/07
Stony River Properties 74 CC		2005/067618/23
20.00100122-0-10000000000000000000000000	Halfway Toyota Ottery	2003/06/618/23
Thutha Motors (Pty) Ltd	nanway Toyota Ottery	
Uvongo Motors (Pty) Ltd Village Mall Auto (Pty) Ltd	Halfway Toyota Fourways / Lexus	1949/033202/07 2013/043983/07
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