



Porsche Middle East and Africa FZE

PAIA MANUAL

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

DATE OF COMPILATION: 09 May 2024

DATE OF REVISION: 09 May 2024

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 **"PAIA"** Promotion of Access to Information Act No. 2 of 2000 (as amended).
- 1.2 **"POPIA"** Protection of Personal Information Act No.4 of 2013.
- 1.3 **"Regulator"** Information Regulator.

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a private body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the private body, by providing a description of the subjects on which the private body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the private body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer (if applicable) who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the private 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the private 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
- 2.10 know whether the private body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE PORSCHE MIDDLE EAST AND AFRICA FZE

3.1. Chief Information Officer

Name: Dmitry Kurdyukov
Tel: +971 4 3569 911
Email: privacy@porsche-me.ae
Fax number: +971 4 3569 997

3.2. Access to information general contacts

Email: smartmobility@porsche-me.ae

3.3 National or Head Office

Postal Address: P.O. Box 341356, Dubai, UAE

Physical Address: **Porsche Middle East and Africa FZE**
Plot-29-911, Dubai Silicon Oasis
Dubai, United Arab Emirates

Telephone: +971 4 3569 911
Email: smartmobility@porsche-me.ae
Website: <https://connect-store.porsche.com/za/en>

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

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("**Guide**"), in an easily comprehensible form and manner, as may

reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

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

4.3. The aforesaid Guide contains the description of-

- 4.3.1. the objects of PAIA and POPIA;
- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;

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.*

- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;

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

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

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

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

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.”

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available in the following official language, for public inspection during normal office hours-

4.6.1 ENGLISH

5. CATEGORIES OF RECORDS OF PORSCHE MIDDLE EAST AND AFRICA FZE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Legal and other relevant documents	Privacy Policy, Terms and Conditions, Terms of Use, Code of Conduct,	X	X
	Records that are lodged in terms of regulatory or legislative requirements with the Information Regulator.		X
	Information that is made available on our official website located at https://connect-store.porsche.com/za/en	X	
	All documents including sales, promotional, and trade marketing materials, as well as booklets and pamphlets published by Porsche		X
	Advertising materials.		X
	Press releases.	X	X

6. DESCRIPTION OF THE RECORDS OF PORSCHE MIDDLE EAST AND AFRICA FZE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
PAIA Manual	Promotion of Access to Information Act 2 of 2000

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE PORSCHE MIDDLE EAST AND AFRICA FZE

Subjects on which the body holds records	Categories of records
Company Policies	- Company Policies and Code of Conduct

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

a) *The provision of Services requested by the Data Subject*

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

The categories of Data Subjects and of the information or categories of information relating thereto includes but is not limited to those set out in our Privacy Policy: <https://connect-store2.porsche.com/za/en/t/privacy>

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

The recipients or categories of recipients to whom the personal information may be supplied includes but is not limited to those set out in our Privacy Policy: <https://connect-store2.porsche.com/za/en/t/privacy>

8.4 Planned transborder flows of personal information

Planned transborder flows of personal information includes by is not limited to those set out in our Privacy Policy: <https://connect-store2.porsche.com/za/en/t/privacy>

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Porsche Middle East and Africa FZE implements technical and organizational measures to safeguard personal information against accidental or intentional manipulation, loss, destruction, and unauthorized access.

A dedicated Cyber Security Team actively monitors our systems and relevant external events. Cyber Security training is mandatory for all employees, fostering a security-conscious workforce. We leverage encryption technology to further enhance data security. Furthermore, data resides within a closed ecosystem for additional protection. Access right management is implemented to restrict unauthorized use and strict measures govern data entry.

We perform regular updates to continuously improve the security of personal information.

9. POPIA DATA SUBJECT REQUEST PROCESS

- 9.1** A data subject may, upon proof of identity, request Porsche Middle East and Africa FZE to confirm, free of charge, all the information it holds about the data subject and may request access to such information
- 9.2** . A data subject may object, at any time, to the processing of personal information by, Porsche Middle East and Africa FZE on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing.
- 9.3** A data subject may also request Porsche Middle East and Africa FZE to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully; or destroy or delete a record of personal information about the data subject that Porsche Middle East and Africa FZE is no longer authorised to retain in terms of POPIA's retention and restriction of records provisions.
- 9.4** If a data subject wishes to:
- 9.4.1 Submit a data subject access request, the data subject must complete the form attached hereto as **Annexure 1** and submit it to the Porsche Middle East and Africa FZE Information Officer.
 - 9.4.2 Object to the processing of personal information, the data subject must complete the form attached hereto as **Annexure 2** and submit it to the Porsche Middle East and Africa FZE Information Officer or Deputy Information Officer.
 - 9.4.3 Request a correction or deletion of personal information or the destruction or deletion of a record of personal information, the data subject must complete the form attached hereto as **Annexure 3** and submit it to the Porsche Middle East and Africa FZE Information Officer.
- 9.5** Proof of the data subject's identity (and that of any related third parties acting on behalf of the data subject) must be provided on submitting any of the data subject forms to the Porsche Middle East and Africa FZE Information Officer.

10. PAIA ACCESS REQUEST PROCEDURE

10.1 Completion of PAIA Access Request Form

In order for Porsche Middle East and Africa FZE to respond to PAIA requests in a timely manner, the Access Request Form attached as **Annexure 1** to this Manual must be used when making a PAIA request.

10.2 Submission of PAIA Access Request Form

10.2.1 The completed PAIA Access Request Form must be submitted either via conventional mail, e-mail, or fax and must be addressed to the Porsche Middle East and Africa FZE Information Officer.

10.3 Grounds for Refusal in terms of PAIA

10.3.1 Porsche Middle East and Africa FZE may legitimately refuse to grant access to a requested record that falls within a certain category. Grounds on which Porsche Middle East and Africa FZE may refuse access include:

10.3.1.1 Protecting personal information that Porsche Middle East and Africa FZE holds about a third person (who is a natural person), including a deceased person, from unreasonable disclosure.

10.3.1.2 Protecting commercial information that Porsche Middle East and Africa FZE holds about a third party or about Porsche Middle East and Africa FZE (for example trade secrets: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organization or the third party).

10.3.1.3 If disclosure of the record would result in a breach of a duty of confidence owed to a third party in terms of an agreement.

10.3.1.4 If disclosure of the record would endanger the life or physical safety of an individual.

10.3.1.5 If disclosure of the record would prejudice or impair the security of property or means of transport.

- 10.3.1.6 If disclosure of the record would prejudice or impair the protection of the safety of the public.
- 10.3.1.7 The record is privileged from production in legal proceedings unless the legal privilege has been waived.
- 10.3.1.8 Disclosure of the record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of Porsche Middle East and Africa FZE.
- 10.3.1.9 Disclosure of the record would put Porsche Middle East and Africa FZE at a disadvantage in contractual or other negotiations or prejudice it in commercial competition.
- 10.3.1.10 The record is a computer programme.
- 10.3.1.11 The record contains information about research carried out or about to be carried out on behalf of a third party or Porsche Middle East and Africa FZE.
- 10.3.1.12 Records that cannot be found or do not exist.
- 10.3.1.13 If Porsche Middle East and Africa FZE has searched for a record and it is believed that the record either does not exist or cannot be found, the requestor will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

10.4 Your Remedies

- 10.4.1 Porsche Middle East and Africa FZE does not have an internal appeal procedure. As such, the decision made by Porsche Middle East and Africa FZE's Information Officer is final.
- 10.4.2 If your request is denied, you are entitled to lodge a complaint with the Information Regulator or apply to a court with appropriate jurisdiction for relief.

11. AVAILABILITY OF THE MANUAL

11.1 A copy of the Manual is available-

- 11.1.1 on <https://connect-store.porsche.com/za/en>, if any;

11.1.2 the head office of the Porsche Middle East and Africa FZE for public inspection during normal business hours;

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

11.1.4 to the Information Regulator upon request.

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

12. UPDATING OF THE MANUAL

The Information Officer will on a regular basis update this manual.

Issued by



Dmitry Kurdyukov
Legal & Compliance Director
Porsche Middle East and Africa FZE

ANNEXURE 1

FORM 2

REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION	
Full Names	
Identity Number	
Capacity in which request is made <i>(when made on behalf of another person)</i>	
Postal Address	

Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	

Any further particulars of record	
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions, and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	

Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

ANNEXURE 2

FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.

4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 2(1)]

Note:

1. *Affidavits or other documentary evidence in support of the objection must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number....

A	DETAILS OF DATA SUBJECT	
Name and surname of data subject:		
Residential, postal, or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		
B	DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (<i>if the responsible party is a natural</i>):		
Residential, postal, or business address:		
	Code ()	

Contact number(s):	
Fax number:	
E-mail address:	
Name of public or private body <i>(if the responsible party is not a natural person)</i> :	
Business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
C	REASONS FOR OBJECTION <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....

Signature of Data Subject (applicant)

ANNEXURE 3

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 3(2)]

Note:

1. *Affidavits or other documentary evidence in support of the request must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number....

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name and surname of responsible party (<i>if the responsible party is a natural person</i>):	
Residential, postal, or	

