

Promotion of Access to Information Manual

Document Number: HR-01-030 Rev 3

Date: 16 September 2025

Table of Contents

| | | |
|----|---|---|
| 1. | DEFINITIONS, ABBREVIATIONS AND GLOSSARY OF TERMS..... | 3 |
| 2. | PURPOSE..... | 3 |
| 3. | SERVICES OF NEWSCLIP MEDIA MONITORING | 3 |
| 4. | ORGINASATIONAL STRUCTURE | 3 |
| 5. | CONTACT DETAILS OF THE INFORMATION AND DEPUTY INFORMATION OFFICER | 6 |
| 6 | INFORMATION / DOCUMENTS AVAILABLE IN ACCORDANCE WITH OTHER LEGILATION | 6 |
| 7 | RECORDS AUTOMATICALLY AVAILABLE | 7 |
| 8 | RECORDS NOT AUTOMATICALLY AVAILABLE | 7 |
| 9 | REQUEST PROCEDURE | 7 |
| 10 | FEES | 8 |
| 11 | GROUND FOR REFUSAL TO GRANT ACCESS..... | 9 |
| 12 | GENERAL | 9 |

| POLICY APPROVAL | | | |
|----------------------------|----------------------------|-----------|------|
| NAME AND SURNAME | DESIGNATION | SIGNATURE | DATE |
| Simon Dabbs | Managing Director | | |
| Jeanine van der Westhuizen | Information Officer | | |
| Adriaan du Plessis | Deputy Information Officer | | |

1. DEFINITIONS, ABBREVIATIONS AND GLOSSARY OF TERMS

| Term | Description/Definition |
|----------------------------------|--|
| Company | Newsclip Media Monitoring (Pty) Ltd |
| Employee | Any person, excluding an independent contractor, who is employed by the company and who receives, or is entitled to receive any remuneration from the company. |
| PAIA | Promotion of Access to Information Act, 2000 (Act 2 of 2000) |
| Information Officer (IO) | The Information Officer is the person authorised to handle PAIA requests. |
| Deputy Information Officer (DIO) | The persona designated by the Information Officer of a public body to assist the requester with their PAIA request. |
| PAIA Request | The name given to the document(s) submitted to a public or private body requesting access to information in terms of PAIA. |
| PAIA Request reference number | The reference number you allocate for an individual PAIA request, e.g 0/0/0/PAIA/date. It is advisable to use this reference number throughout all correspondence with the requester, as well as asking them to do the same. |

2. PURPOSE

- 2.1 The purpose of the PAIA Manual is to provide information on how to obtain access to records held by Newsclip Media Monitoring (Pty) Ltd to identify the structure and services, in order to facilitate the implementation of the Promotion of Access to Information Act, 2000 (Act No 2 of 2000).

3. SERVICES OF NEWSCLIP MEDIA MONITORING

- 3.1 Newsclip Media Monitoring provides services in media monitoring, content management and analysis. Print, Broadcast, online Media and Social Media monitoring are specialised in. Monitoring the complete media landscape, Newsclip has a comprehensive vision of the media across all channels, as well as an expanding African and International media portfolio. Clients keyword mentions are tracked or requested topics within the media, collate the data and then delivered to clients.

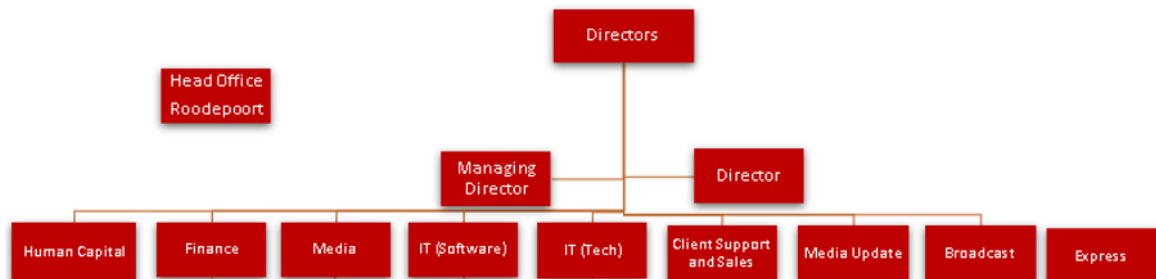
Further information regarding the services of Newsclip are available on the website <https://www.newsclip.co.za/>

4. ORGANISATIONAL STRUCTURE

- 4.1 Newsclip Media Monitoring was established in 1983 and is a private owned entity. Newsclip is registered with The Dramatic Artistic and Literary Rights Organisation (DALRO), that administers the various aspects of copyright on behalf of the publishers that they represent. Newsclip's other industry associations include The International Federation of Press Clipping Bureaux (FIBEP), as well as The South African Media Monitoring and Measurement Association (SAMMA). The board of Directors consist of a Managing Director and Director. Management is appointed in the various

departments with the relevant expertise. Offices are based in Roodepoort, Cape Town and Durban.

High Level Organogram



4.2 Description of categories of records held:

Company documentation:

- Compliance with Corporate Governance
- Shareholders Agreements
- Share Certificates
- Delegations of Authority
- General Correspondence

Department: Accounts:

- Annual Reports
- VAT Returns
- Income tax returns and assessments
- Asset records
- Invoices
- Credit Notes
- Journals, Ledgers & Balance sheets
- Income Statements
- Trial Balance statements
- Cash Flow statements
- Tax Invoices
- Insurance Policies
- Lease Agreements
- Contractual records and information relating to suppliers, service providers, contractors and professional advisors
- Building plans
- General Correspondence

Department: Human Capital:

- Employee Records
- Job Descriptions
- Payroll Data
- Medical Aid Records
- UIF Records
- PAYE Records
- Employment Equity Reports
- Skills Development Reports
- Leave Records
- Salary Information
- Disciplinary Records
- Job Competency Profile
- Employee Performance Records
- Training Records
- Internal Policies and Procedures
- Regulatory Submissions
- General Correspondence

Department: Sales:

- Contracts/ Agreements
- Customer Liaison
- Customer Records
- General Correspondence

Department: IT:

- Development of New Products
- Databases
- Information Technology
- Product-related Records
- Internal Policies and Procedures
- General Correspondence

It is recorded that access to the documents listed above may be protected by privacy or the grounds of refusal set out in the Act. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act and other applicable legislation.

4.3 Automatically available records:

The records listed below are automatically available without having to submit a formal request to access the information in terms of PAIA.

4.3.1 Public Product Information

4.3.2 Public Corporate Records

4.3.3 B-BBEE Certificate

Records of the company which are not automatically available must be requested in terms of the procedure set out in this manual may be subject to the restrictions and right of refusal to access as provided for in the Act.

5. CONTACT DETAILS OF THE INFORMATION AND DEPUTY INFORMATION OFFICER

5.1 The Managing Director of Newsclip Media Monitoring has appointed the following individuals as the Information Officer and Deputy Information Officers of which will be responsible for dealing with requests for records and information:

| | |
|----------------------------|---|
| Information Officer | Jeanine van der Westhuizen – Senior Human Capital Practitioner |
| Telephone number | 011 020 5250 |
| Fax number | 011 288 6610 |
| Email address | popi@news.newsclip.co.za / info@newsclip.co.za |
| Postal address | Private Bag X1 Fontainebleau 2032 |
| Deputy Information Officer | Adriaan du Plessis – Software Development Manager |
| Telephone number | 011 020 5250 |
| Fax number | 011 288 6610 |
| Email address | popi@news.newsclip.co.za |
| Postal address | Private Bag X1 Fontainebleau 2032 |

6 INFORMATION / DOCUMENTS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

6.1 Newsclip Media Monitoring keeps information / documents in accordance with the following legislation (please note that this is not an exhaustive list):

Companies Act, No. 71 of 2008
Income Tax Act, No. 58 of 1962
Value-Added Tax Act, No. 89 of 1991
National Credit Act, No. 34 of 2005
Unemployment Insurance Act, No. 63 of 2001
Unemployment Insurance Contributions Act, No. 4 of 2002
Basic Conditions of Employment Act, No. 75 of 1997
Broad Based Black Economic Empowerment Act, No. 53 of 2003
Employment Equity Act, No. 55 of 1998
Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
Insolvency Act, No. 24 of 1936
Occupational Health and Safety Act, No. 85 of 1993
Copyright Act, No. 98 of 1978
Labour Relations Act, No. 66 of 1995

Skills Development Act, No. 97 of 1998
Skills Development Levies Act, No. 9 of 1999
Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
Arbitration Act, No. 42 of 1995
Medical Schemes Act, No. 131 of 1998
Electronic Communication and Transactions Act, No. 25 of 2002
Electronic Communications Act, No. 13 of 2000
Protection of Personal Information Act, No. 4 of 2013

7 RECORDS AUTOMATICALLY AVAILABLE

7.1 The information is classified and grouped according to records relating to the following subjects and categories:

7.1.1 Personnel records:

- 7.1.1.1 Personal records provided by personnel;
- 7.1.1.2 Records provided by a third party relating to personnel;
- 7.1.1.3 Conditions of employment and other personnel-related contractual and legal records;
- 7.1.1.4 Internal evaluation records and other internal records;
- 7.1.1.5 Correspondence relating to personnel;
- 7.1.1.6 Training schedules and material.

“Personnel” refers to any person who works for The Company and receives or is entitled to remuneration.

7.1.2 Customer related records:

- 7.1.2.1 Records provided by a customer to The Company;
- 7.1.2.2 Records generated by or withing The Company for financial purposes.

“Customer” refers to any natural person or company which receives services from The Company.

7.2 Certain other information relating to the company is also made available on said website from time to time

8 RECORDS NOT AUTOMATICALLY AVAILABLE

8.1 Records of the company which are not automatically available must be requested in terms of the procedure set out in section 9 of this PAIA manual and which may be subject to the restrictions and right of refusal to access as provided for in the Act

9 REQUEST PROCEDURE

9.1 The requester of information must comply with all the procedural requirements laid down in the Act when requesting access to a record.

- 9.2 The information officer shall not be obliged to furnish any information until all requirements laid down in the Act and set out herein have been fulfilled.
- 9.3 The prescribed form annexed hereto as Appendix 1 must be completed and submitted to the Information Officer at the postal or physical or email address stated in paragraph 5 above, together with payment of the prescribed fees, if applicable (see paragraph 10 below for an explanation of the fees that are payable).
- 9.4 The prescribed form must be completed with sufficient detail to enable the Information Officer to identify the record(s) in question.
- 9.5 If there is insufficient space on a printed form to answer a question, additional information may be provided on an additional folio.
- 9.6 If a request is made on behalf of another person, the requester must submit proof of such capacity to the reasonable satisfaction of the Information Officer.
- 9.7 If the requester cannot complete the prescribed form due to illiteracy or disability, the requester may make the request orally and in person.
- 9.8 The Information Officer will process the request within 30 days unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is required.
- 9.9 Where an extension of the 30-day time limit is required, the requester shall be notified together with reasons explaining why the extension was required.
- 9.10 Once the request is processed, the requester will be informed whether access will be granted or refused together with reasons for any refusal.

10 FEES

10.1 The fees for reproduction of a record as referred to in section 52(3) are as follows –

| | |
|---|--------|
| 10.1.1 for every photocopy of an A4 size page or part thereof | R1,10 |
| 10.1.2 for every printed copy of an A4-size page or part thereof | R0,75 |
| 10.1.3 for a copy of a compact disc | R70,00 |
| 10.1.4 for a transcript of visual images for an A4 size page or part thereof | R40,00 |
| 10.1.5 for a copy of visual images | R60,00 |
| 10.1.6 for a transcript of an audio record, for an A4-size page or part thereof | R20,00 |
| 10.1.7 for a copy of an audio record | R30,00 |

10.2 The request fee payable by a requester, other than a personal requester is R50, 00.

10.3 If the Information Officer or if the Deputy Information Officers is of the opinion that six hours will be exceeded to search, reproduce and/or prepare the information requested, a deposit is payable

equal to one-third of an amount of R30 for each hour or part thereof, exceeding the six hours.

11 GROUNDS FOR REFUSAL TO GRANT ACCESS

The main grounds upon which a request for information may be declined are:

- 11.1 Protecting personal information of a third party (who is a natural person) from unreasonable disclosure.
- 11.2 Protecting commercial information of a third party (for example trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party).
- 11.3 Disclosure would result in the breach of a duty of confidence owed to a third party.
- 11.4 Disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third party.
- 11.5 Mandatory protection of records which would be regarded as privileged in legal proceedings unless such privilege has been waived.
- 11.6 Refusing access to a record containing trade secrets, financial or sensitive information of Newsclip Media Monitoring or any information that would put the Company at a disadvantage in negotiations or prejudice it in commercial competition.
- 11.7 The request is frivolous or vexatious or involves an unreasonable diversion of resources.
- 11.8 The record contains information about research being carried out, or about to be carried out, on behalf of a third party or on behalf of Newsclip Media Monitoring.

12 GENERAL

The company reserves the right to amend this policy from time to time.

APPENDIX 1

FORM 2 – REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

Section 53 (1) of the Promotion of Access to Information Act 2 of 2000 Regulation 7

A. PARTICULARS OF PRIVATE BODY

| | |
|-----------------------|---|
| Name of Private Body: | Newsclip Media Monitoring (Pty) Ltd |
| Registration No: | 1999/002288/07 |
| Head of Organisation: | Simon Dabbs |
| Physical Address: | Cnr JG Strydom & Springhaas Road Constantia Kloof Roodepoort 1709 |
| Postal Address: | Private Bag X1 Fontainebleau 2032 |
| Telephone: | 011 020 5250 |
| Email: | popi@news.newsclip.co.za / info@newsclip.co.za |

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 (when made on behalf of another person) | | | | |
| Postal Address | | | | |
| Street Address | | | | |
| E-mail Address | | | | |
| Contact Numbers | Tel. (B): | | Facsimile: <table border="1"><tr><td></td></tr></table> | |
| | | | | |
| Cellular: | | | | |
| Full names of person on whose behalf request is made (if applicable): | | | | |
| Identity Number | | | | |
| Postal Address | | | | |

| | | | |
|--|----------|--|-----------|
| Street Address | | | |
| E-mail Address | | | |
| Contact Numbers | Tel. (B) | | Facsimile |
| | Cellular | | |
| <p align="center">PARTICULARS OF RECORD REQUESTED</p> <p><i>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.)</i></p> | | | |
| Description of record or relevant part of the record: | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Reference number, if available | | | |
| Any further particulars of record | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| <p align="center">TYPE OF RECORD</p> <p align="center"><i>(Mark the applicable box with an "X")</i></p> | | | |
| 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: | |
| | |
| | |

| FEES | |
|--------|--|
| a) | <i>A request fee must be paid before the request will be considered.</i> |
| b) | <i>You will be notified of the amount of the access fee to be paid.</i> |
| c) | <i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i> |
| d) | <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i> |
| Reason | |
| | |
| | |

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

| Postal address | Facsimile | Electronic communication (Please specify) |
|----------------|-----------|--|
| | | |

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

| | |
|---|--|
| Reference number: | |
| Request received by: (State Rank, Name And Surname of Information Officer) | |
| Date received: | |
| Access fees: | |
| Deposit (if any): | |

Signature of Information Officer