

# **TSOGO SUN**

## **CASINOS . HOTELS**

### **TSOGO SUN LIMITED**

**(and its subsidiaries associated)**

**(“Tsogo Sun” or the Tsogo Sun Group” or “the Company”)**

### **THE PROMOTION OF ACCESS TO INFORMATION MANUAL**

**(“Manual”)**

## 1. PREAMBLE

- 1.1. The Promotion of Access to Information Act, 2000 (“**PAIA**”) came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.
- 1.2. Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual must comply with.
- 1.3. This Manual constitutes the Tsogo Sun PAIA manual. This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 (“**POPIA**”), which gives effect to everyone’s Constitutional right to privacy. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.
- 1.4. This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

VERSION	POLICY OWNER	DATE
1.0	Tsogo Sun	30/06/2021
1.1	Tsogo Sun	31/10/2021
1.2	Tsogo Sun	30/09/2022
1.3	Tsogo Sun	12/06/2023
1.4	Tsogo Sun	23/10/2023
1.5	Tsogo Sun	07/02/2024
1.6	Tsogo Sun	19/02/2024
1.7	Tsogo Sun	14/06/2024
1.8	Tsogo Sun	26/05/2025

## 2. ABOUT TSOGO SUN

Tsogo Sun, listed on the JSE, is Southern Africa’s premier gaming, hotel and entertainment group, owning and operating premier casino and entertainment destinations in six provinces of South Africa, Galaxy Bingo sites in six provinces of South Africa, VSlots limited payout machines (“LPM’s”) across all provinces, bookmaking and online betting, hotels, theatres, cinemas, a theme park, restaurants, bars, conference and banqueting facilities, and holds a 20% equity interest in in SunWest International Proprietary Limited and Worcester Casino Proprietary Limited.

### 3. CONTACT DETAILS

- |  |  |
|--|--|
| a. Name of Private Body:                       | The Tsogo Sun Group of companies listed in <a href="#">Annexure G</a>  |
| b. Designated Group Information Officer:       | National Compliance Manager  |
| c. Deputy Information Officer:                 | Compliance Manager   |
| d. Email address of Group Information Officer: | <a href="mailto:corporate.compliance@tsogosun.com">corporate.compliance@tsogosun.com</a><br>(This email address may be used to submit PAIA requests) |
| e. Postal address:                             | Private Bag X190, Bryanston, 2021  |
| f. Street address:                             | Palazzo Towers East, Montecasino Boulevard, Fourways, 2055   |
| g. Phone number:                               | 011 510 7700   |
| h. Fax number:                                 | +27112527344   |

### 4. INFORMATION REGULATORS GUIDE

An official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from Information Regulator and the Information Officer free of charge. Any request for public inspection of the Guide at the office of the Information Officer or a request for a copy of the Guide from the Information Officer must substantially correspond with **PAIA Form 1** of **Annexure A** to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to [Annexure A - PAIA Form 1](#).

Any enquiries regarding the Guide should be directed to The Information Regulator:

**Postal Address:** JD House, 27 Stiemens Street  
Braamfontein, Johannesburg, 2001  
P.O. Box 31533  
Braamfontein, Johannesburg, 2017

**Telephone Number:** Refer to website  
**Fax Number:** Refer to website  
**E-mail Address:** [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)  
**Website:** <http://inforegulator.org.za>

### 5. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

- 5.1. to provide a list of all records held by the legal entity;
- 5.2. to set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;
- 5.3. to define the manner and form in which a request for information must be submitted; and
- 5.4. to comply with the additional requirements imposed by POPIA.

## 6. ENTRY POINT FOR REQUESTS

- 6.1. PAIA provides that a person may only make a request for information if the information is required for the exercise or protection of a legitimate right.
- 6.2. Information will therefore not be furnished unless a person provides sufficient particulars to enable Tsogo Sun to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of an individual's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.
- 6.3. The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.
- 6.4. The Information Officer will facilitate the liaison with the internal legal team on all of these requests.
- 6.5. All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the contact details set out in paragraph 3 above.

## 7. AUTOMATICALLY AVAILABLE INFORMATION

- 7.1. Information that is available in the public domain and information obtainable via the Tsogo Sun website about Tsogo Sun is automatically available and need not be formally requested in terms of this Manual. The information, which may not be comprehensive, is listed below:
  - Integrated Annual report
  - BBBEE certificate
  - Privacy Policy

## 8. INFORMATION AVAILABLE IN TERMS OF POPIA

- 8.1. In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which data is processed by Tsogo Sun will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected. Please also refer to the Tsogo Sun Privacy Policy <https://www.tsogosun.com/privacy-policy/> for further information.

### 8.2. Categories of data subjects and the personal information collected by Tsogo Sun

Employees: Name, ID number, physical address, health information, disability information, employee benefit information, bank details, tax number, letter of appointment, performance records, payslips, training records, CV, records of qualifications, psychometric assessment results, credit check results, criminal record check results, CCTV footage.

For clients: Name, ID number/Passport number, date of birth, nationality, physical address, contact details, occupation, source of funds, PIP/PEP status, bank details, CCTV footage.

For business partners, contractors and suppliers: Company and/or employee name, ID number, registration number, tax information, physical address, contact details, bank details, contracts, CCTV footage, vehicle information.

Note that this may not be an exhaustive list, and these records are not necessarily available for requestors.

**8.3. The purpose of processing personal information**

Personal information is processed as part of its service offering, to manage accounts, meet contractual rights and obligations, as well as for operational and auditing purposes and to comply with obligations imposed by Law.

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

A person that makes a successful application for access to information in terms of PAIA. Other parties in response to a formal legal process or when necessary to conduct or protect our legal rights. Statutory oversight bodies to comply with an obligation imposed by law. As otherwise provided for by law. Internal and external auditing functions. Persons that provide services to Tsogo Sun in terms of a contract or a mandate, and where these persons are limited in their ability to use information. Third parties that provide data retention services to Tsogo Sun in terms of a contract.

**8.5. Planned trans-border flows of personal information**

Tsogo Sun may transfer personal information to places outside of South Africa and store it there, where authorised suppliers might process it. If that happens, personal information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.

**8.6. A general description of information security measures to be implemented by Tsogo Sun**

Tsogo Sun takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in our possession. Tsogo Sun takes appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage. Security measures include, but are not limited to, all servers being protected with Symantec endpoint security which provides client and server level antivirus and spyware protection, network and host exploit mitigation, proactive threat protection, firewalls and Endpoint Detection and Response. Tsogo Sun also performs regular vulnerability scans on the network to ensure that all data is always kept safe and secure.

## 9. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation. Note that the below may not be an exhaustive list, and these records are not necessarily available for requestors:

LEGISLATION	CATEGORIES OF INFORMATION
<b><u>Company Secretarial, Legal</u></b> <ul style="list-style-type: none"> <li>Companies Act 71 of 2008</li> <li>Trademarks Act 194 of 1993</li> <li>Copyright Act 98 of 1978</li> <li>Competition Act 89 of 1998</li> <li>Deed Registries Act 47 of 1937</li> </ul>	<ul style="list-style-type: none"> <li>Contracts and agreements</li> <li>Statutory records</li> <li>Minutes of meetings</li> <li>Organogram</li> <li>Management Agreements</li> <li>Registered trademarks, trade names, protected names and other copyright items</li> <li>Title Deeds</li> <li>Social &amp; Ethics Committee reports</li> <li>Audit &amp; Risk Committee reports</li> </ul>
<b><u>Accounting and Finance</u></b> <ul style="list-style-type: none"> <li>Income Tax Act 58 of 1962</li> <li>Revenue Laws Amendment Act 60 of 2008</li> <li>Value Added Tax Act 89 of 1991</li> <li>National Credit Act 34 of 2005</li> <li>Securities Transfer Tax Act 25 of 2007</li> <li>Customs and Excise Act 91 of 1964</li> </ul>	<ul style="list-style-type: none"> <li>Audited financial statements</li> <li>Taxation records</li> <li>Asset registers</li> <li>Management accounts</li> <li>Audit and Risk Committee reports</li> <li>Operational</li> <li>Credit Agreements</li> </ul>
<b><u>Human Resources</u></b> <ul style="list-style-type: none"> <li>Labour Relations Act 66 of 1995</li> <li>Basic Conditions of Employment Act 75 of 1997</li> <li>Employment Equity Act 55 of 1998</li> <li>Skills Development Levies Act 9 of 1999</li> <li>Pension Funds Act 24 of 1956</li> <li>Medical Schemes Act 131 of 1998</li> <li>Compensation for Occupational Injuries and Health Diseases Act 130 of 1993</li> <li>Occupational Health and Safety Act 85 of 1993</li> <li>Unemployment Insurance Act 63 of 2001</li> <li>National Minimum Wage Act 9 of 2018</li> <li>Promotion of Equality and Prevention of Unfair Discrimination Act, 2000</li> <li>Occupational Health and Safety Act 85 of 1993</li> </ul>	<ul style="list-style-type: none"> <li>Remuneration policy and implementation reports</li> <li>Staff records</li> <li>Contracts of employment</li> <li>Employment equity reports</li> <li>Policies and Procedures</li> <li>Pension and Provident Fund details</li> <li>Collective Agreements</li> <li>Employee Licences</li> <li>Employment Equity reports</li> <li>Skills Levy reports</li> <li>Training and Development reports</li> <li>Industrial Relations records</li> </ul>

LEGISLATION	CATEGORIES OF INFORMATION
<b><u>Compliance</u></b> <ul style="list-style-type: none"> <li>National Gambling Act of 2004</li> <li>Eastern Cape Gambling and Betting Act of 1997</li> <li>Gauteng Gambling Act of 1995</li> <li>KwaZulu-Natal Gambling Act of 1996</li> <li>Free State Gambling and Liquor Act of 2010</li> <li>The North West Gambling Act of 2001</li> <li>Northern Cape Gambling Act of 2008</li> <li>Northern Province (Limpopo Province) Gambling Act of 1996</li> <li>Western Cape Gambling and Racing Act of 1996</li> <li>Mpumalanga Gambling Act of 1995</li> <li>Financial Intelligence Centre Act 38 of 2001 ("FICA")</li> <li>Promotion of Access to Information Act 2 of 2000 ("PAIA")</li> <li>Protection of Personal Information Act 4 of 2013 ("POPIA")</li> </ul>	<ul style="list-style-type: none"> <li>Gaming and Betting Licensing records</li> <li>FICA records</li> <li>PAIA records</li> <li>POPIA records</li> </ul>
<b><u>Liquor</u></b> <ul style="list-style-type: none"> <li>Gauteng Liquor Act 2 of 2003</li> <li>Free State Liquor Act 3 of 2007</li> <li>KwaZulu-Natal Liquor Act 27 of 1989</li> <li>Western Cape Liquor Act 4 of 2008</li> <li>Eastern Cape Liquor Act 10 of 2003</li> <li>Mpumalanga Liquor Act 5 of 2006</li> <li>National Liquor Act 59 of 2003</li> <li>Northern Cape Liquor Act 2 of 2008</li> <li>North West Liquor Act 27 of 1989</li> </ul>	<ul style="list-style-type: none"> <li>Liquor Licenses</li> </ul>
<b><u>Tobacco</u></b> <ul style="list-style-type: none"> <li>Tobacco Products Control Act 83 of 1993</li> </ul> <b><u>Operations</u></b> <ul style="list-style-type: none"> <li>Consumer Protection Act 68 of 2008 ("CPA")</li> <li>Tourism Act 3 of 2014</li> <li>National Environmental Management Act 107 of 1998</li> <li>Safety at Sports and Recreational Events Act 2 of 2010</li> <li>Carbon Tax Act 15 of 2019</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Floor plans</li> <li>CPA records</li> <li>Tourism grading certificates</li> </ul>
<b><u>Other</u></b> <ul style="list-style-type: none"> <li>Broad-Based Black Economic Empowerment Act, 53 of 2003</li> <li>Environmental Health and Safety Act 1989</li> <li>National Building Regulations and Building Standards Act 103 of 1977</li> <li>Occupational Health and Safety Act 85 of 1993</li> </ul>	<ul style="list-style-type: none"> <li>BBBEE Verification Certificates</li> <li>Insurance documentation</li> <li>Banking details</li> <li>Treasury documents</li> <li>Audit &amp; Risk Committee reports – Risk &amp; Insurance</li> </ul>

## 10. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST

- 10.1. Tsogo Sun Group maintain records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.
- 10.2. Please note further that many of the records held by Tsogo Sun are those of third parties, such as clients and employees, and Tsogo Sun takes the protection of third-party confidential information very seriously. For further information on the grounds of refusal of access to a record please see paragraph 11.5 below. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.

### Company Secretarial / Legal

- Contracts and agreements
- Statutory records
- Licences
- Minutes of meetings
- Title Deeds
- Organogram
- Management Agreements
- Leases
- Registered trademarks, trade names, protected names and other copyright items

### Human Resources

- HR and Remuneration Committee reports
- Staff records
- Contracts of employment
- Employment equity reports
- Policy and Procedures
- Pension and Provident Fund details
- Collective Agreements
- BBBEE Verification Certificates
- Employee Licences

### Financial

- Audited financial statements
- Taxation records
- Asset register
- Management accounts
- Banking details
- Treasury documents
- Insurance documentation
- Audit and Risk Committee reports Operational

### Operational

- Social & Ethics Committee report
- Databases
- Computer software, including software and maintenance agreements

Note that this may not be an exhaustive list, and these records are not necessarily available for requestors.



## 11 REQUEST PROCEDURE

### 11.1 Completion of the prescribed form

- 11.1.1 Any request for access to a record in terms of PAIA must substantially correspond with **PAIA Form 2 of Annexure B** to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations and should be specific in terms of the record requested. Please refer to [Annexure B – PAIA Form 2](#).
- 11.1.2 A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.
- 11.1.3 POPIA provides that a data subject may, upon proof of identity, request Tsogo Sun to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.
- 11.1.4 POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, Tsogo Sun must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.
- 11.1.5 Grounds for refusal of the data subject's request are set out in the PAIA and are discussed below.
- 11.1.6 POPIA provides that a data subject may object, at any time during office hours, to the processing of personal information by Tsogo Sun, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as [Annexure E – POPIA Form 1](#) and submit it to the Information Officer at the postal or physical address, facsimile number or electronic mail address set out above.
- 11.1.7 A data subject may also request Tsogo Sun 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 Tsogo Sun is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- 11.1.8 A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address, facsimile number or electronic mail address as set out above on the form attached hereto as [Annexure F– POPIA Form 2](#).

### 11.2 Proof of identity

Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

### 11.3 Payment of the prescribed fees

- 11.3.1 Section 54 of PAIA entitles Tsogo Sun to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees will be charged in accordance with the prescribed fees as provided by the Information Regulator under the PAIA regulations from time to time.
- 11.3.2 Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

#### **11.4 Timelines for consideration of a request for access**

- 11.4.1 Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.
- 11.4.2 The Information Officer will inform the requester of the decision, and the fees payable ([Annexure D](#)) (if applicable) on a form that corresponds substantially with [PAIA Form 3 of Annexure C](#) to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations.
- 11.4.3 Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

#### **11.5 Grounds for refusal of access and protection of information**

- 11.5.1 There are various grounds upon which a request for access to a record may be refused. These grounds include:
- the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
  - the protection of 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);
  - if disclosure would result in the breach of a duty of confidence owed to a third party;
  - if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
  - if the record was produced during legal proceedings, unless that legal privilege has been waived;
  - if the record contains trade secrets, financial or sensitive information or any information that would put Tsogo Sun (at a disadvantage in negotiations or prejudice it in commercial competition); and/or
  - if the record contains information about research being carried out or about to be carried out on behalf of a third party or by Tsogo Sun.
- 11.5.2 Section 70 of PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.
- 11.5.3 If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the record.

### **12 REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS**

- 12.1 If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.
- 12.2 There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. In the event that you are not satisfied with the outcome of the request, you are entitled to submit a complaint with the Information Regulator or to apply to a court of competent jurisdiction to take the matter further.
- 12.3 Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has 180 (one hundred and eighty) days to submit

a complaint to the Information Regulator or to appeal the decision in a court of competent jurisdiction.

### **13 AVAILABILITY OF THIS MANUAL**

Copies of this manual are available at our website [www.tsogosun.com](http://www.tsogosun.com) and for inspection at the offices of Tsogo Sun: Palazzo Towers East, Montecasino Boulevard, Fourways, 2055 during normal business hours. A fee for a copy of this manual, as set out in [Annexure D](#) is payable for each A4-size photocopy made.

## Annexure A – PAIA Form 1

## FORM 1

## REQUEST FOR A COPY OF THE GUIDE

[Regulations 2 and 3] [PAIA Forms - Information Regulator \(info regulator.org.za\)](http://info regulator.org.za)

TO: **The Information Regulator**  
P.O. Box 31533  
Braamfontein  
2017

Email address: [helpdesk@info regulator.org.za](mailto:helpdesk@info regulator.org.za)

Tel number: +27 (0) 10 023 5200

OR

TO: **The Information Officer**

Street Address: Palazzo Towers East  
Montecasino Boulevard  
Fourways  
2055

Postal Address: Private Bag X190  
Bryanston  
South Africa  
2021

Telephone: 011 510 7700  
Fax number: +27112527344

Email: [corporate.compliance@tsogosun.com](mailto:corporate.compliance@tsogosun.com)

I,

Full names:				
In my capacity as (mark with "x")	Information Officer		Other	
Name of public/private body (if applicable)				
Postal Address:				
Street Address:				
Email Address:				
Facsimile:				
Contact numbers:	Tel. (B):		Cellular:	

hereby request the following copy(ies) of the guide:

Language (make with "X")		No. of copies	Language (make with "X")		No. of copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			IsiXhosa	
	isiZulu				

Manner of collection (mark with "X")

Personal Collection	Postal address	Facsimile	Electronic communication (please specify)

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
Signature of requester

## Annexure B – PAIA Form 2

## FORM 2

## REQUEST FOR ACCESS TO RECORD

[Regulation 7] [PAIA Forms - Information Regulator \(inforegulator.org.za\)](http://inforegulator.org.za)**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: <table border="1"><tr><td></td></tr></table>	
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		
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p>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. <i>(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"><b>TYPE OF RECORD</b></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			

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

<b>MANNER OF ACCESS</b> (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body (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)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (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)	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
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.	
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 \_\_\_\_\_

\_\_\_\_\_  
e) **Signature of Requester / person on whose behalf request is made**

-----  
f) **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**

## Annexure C – PAIA Form 3

## FORM 3

## OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8] [PAIA Forms - Information Regulator \(inforegulator.org.za\)](http://inforegulator.org.za)

Note:

1. If your request is granted the—
  - (a) amount of the deposit, (if any), is payable before your request is processed; and
  - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

## 1. You requested:

Personal inspection of information at registered address of public/private body (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) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in <b>Annexure C – PAIA Form 3</b> .	
--	--

OR

## 2. You requested:

Printed copies of the information (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form )	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

## 3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (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)	

Kindly note that your request has been:

☐

Approved

☐

Denied, for the following reasons:

--

**4. Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

**5. Deposit payable (if search exceeds six hours):**☐

Yes

☐

No

Hours of search		Amount of deposit (calculated on one third of total amount per request)	
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The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_  
 Name of account holder: \_\_\_\_\_  
 Type of account: \_\_\_\_\_  
 Account number: \_\_\_\_\_  
 Branch Code: \_\_\_\_\_  
 Reference Nr: \_\_\_\_\_  
 Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

 \_\_\_\_\_  
 Information officer

## Annexure D

## FEES IN RESPECT OF PRIVATE BODIES

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: <ul style="list-style-type: none"> <li>(i) Flash drive (to be provided by requestor) R40.00</li> <li>(ii) Compact disc <ul style="list-style-type: none"> <li>• If provided by requestor R40.00</li> <li>• If provided to the requestor R60.00</li> </ul> </li> </ul>	
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: <ul style="list-style-type: none"> <li>(i) Flash drive (to be provided by requestor) R40.00</li> <li>(ii) Compact disc <ul style="list-style-type: none"> <li>• If provided by requestor R40.00</li> <li>• If provided to the requestor R60.00</li> </ul> </li> </ul>	
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 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

## Annexure E - POPIA 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, 2021**

[Regulation 2]

*Note:*

1. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
2. *Complete as is applicable.*

<b>A</b>	<b>DETAILS OF DATA SUBJECT</b>
Name(s) and surname/ registered name of data subject:	
Postal or business address:	
	Code (    )
Contact number(s):	
Fax number / E-mail address:	

<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/ Registered name of responsible party:	
Postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>REASONS FOR OBJECTION IN TERMS OF SECTION 11(3)(a)</b> <i>(Please provide detailed reasons for the objection)</i>

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
*Signature of data subject/designated person*

## Annexure F – POPIA 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, 2021**

[Regulation 3]

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the request may 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.*
3. *Complete as is applicable.*

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.

*Please select applicable reasons for the selected request:*

(a) Inaccurate

☐

(b) Irrelevant

☐

(c) Excessive

☐

(d) Out of Date

☐

(e) Incomplete

☐

(f) Misleading

☐

(g) Obtained unlawfully

☐

☐ Destruction 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
Name(s) and surname / registered name of data subject:	
Postal or business address:	
	Code (    )
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
C	<b>INFORMATION TO BE CORRECTED/DELETED/ / DESTROYED/DELETED</b>  <i>(Please specify the personal information required to be corrected/destroyed/deleted)</i>



<b>D</b>	<b>EXPLANATION FOR THE SELECTED REASON FOR A REQUEST</b> <i>(Please provide detail explanation for the selected reasons for the request for correction or deletion of personal information which is in possession or under the control of the responsible party)</i>

Signed \_\_\_\_\_ at this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
*Signature of data subject/ designated person*

**Annexure G: LIST OF GROUP OF COMPANIES**

<b>Company</b>	<b>Registration number</b>
Adventure World Management (Pty) Ltd	2000/014021/07
Akani Egoli Management (Pty) Ltd	1996/008456/07
Akani Egoli Properties (Pty) Ltd	2005/034937/07
Akani Msunduzi (Pty) Ltd	1997/021611/07
Akani Msunduzi Management (Pty) Ltd	1998/004328/07
Akani-Egoli (Pty) Ltd	1996/006910/07
Blue Bells Country Club (Pty) Ltd	2005/010491/07
Blue Crane Signature Golf Estate (Pty) Ltd	2005/008777/07
Cassava Investments (Pty) Ltd	1997/020545/07
Durban Add-Ventures (Pty) Ltd	1997/013469/07
Emerald Safari Resort (Pty) Ltd	1997/007634/07
Entertainment Holdings (Pty) Ltd	2002/021382/07
Garden Route Casino (Pty) Ltd	1998/000391/07
Gold Reef City Theme Park (Pty) Ltd	1998/022315/07
Gold Reef Management (Pty) Ltd	1998/024893/07
Goldfields Casino and Entertainment Centre (Pty) Ltd	1997/021858/07
Grabblebrook (Pty) Ltd	2013/088934/07
HSS Investments (Pty) Ltd	2012/112763/07
Jeddler Investments (Pty) Ltd	2000/019055/07
K2021134577 (South Africa) (Pty) Ltd	2021/134577/07
K2023126730 (South Africa) (Pty) Ltd	2023/126730/07
K2023126743 (South Africa) (Pty) Ltd	2023/126743/07
Lexshell 94 General Trading (Pty) Ltd	2007/035036/07
Listed Investments (Pty) Ltd	1997/003059/07
Monte Cinemas (Pty) Ltd	1990/003230/07
Play Tsogo (Pty) Ltd	2017/407820/07
Property Investment Company No 10 (Pty) Ltd	1994/005424/07
Richtrau No 292 (Pty) Ltd	2009/020756/07
Ripple Effect 31 (Pty) Ltd	2001/020975/07
Silverstar Casino (Pty) Ltd	1995/000369/07
The Boulevard (Pty) Ltd	2023/969249/07
The Capture Site NPC	2022/811703/08
The Millennium Casino (Pty) Ltd	1970/000341/07
The South African Apartheid Museum at Freedom Park NPC	2001/019108/08
Three Groups Cinemas (Pty) Ltd	2002/023337/07
TMCTS Management Company (Pty) Ltd	1998/012683/07
Tsogo Sun Limited	1989/002108/06
Tsogo Sun Alternative Gaming Investments (Pty) Ltd	2015/269000/07
Tsogo Sun Caledon (Pty) Ltd	1996/010708/07
Tsogo Sun Casino Management Company (Pty) Ltd	1996/007718/07
Tsogo Sun Casinos (Pty) Ltd	1995/012674/07
Tsogo Sun Emonti (Pty) Ltd	1998/017777/07
Tsogo Sun Expansion No 1 (Pty) Ltd	2007/017309/07
Tsogo Sun Expansion No 2 (Pty) Ltd	1996/010501/07
Tsogo Sun Investments (Pty) Ltd	2002/006402/07

Tsogo Sun Hotels Gaming and Entertainment (Pty) Ltd	2002/006556/07
Tsogo Sun KwaZulu-Natal (Pty) Ltd	1997/014551/07
Tsogo Sun Newcastle (Pty) Ltd	1998/002723/07
Tsogo Sun Supply and Distribution (Pty) Ltd	2000/005833/07
Tsogo Sun Treasury (Pty) Ltd	2002/026000/07
Two Rivers Investments (Pty) Ltd	1996/006443/07
West Coast Leisure (Pty) Ltd	1994/005194/07
Whitehorse Investments (Pty) Ltd	2002/021406/07

#### **VUKANI**

Luck at It KZN (Pty) Ltd	2000/017827/07
Luck at It Mpumalanga (Pty) Ltd	2001/011716/07
Luck Holdings (Pty) Ltd	2001/009849/07
Tsogo Sun Alternative Gaming Invest 2 (Pty) Ltd	2015/163900/07
Tsogo Sun Alternative Gaming Invest 3 (Pty) Ltd	2024/596836/07
Tsogo Sun Alternative Gaming Secretarial (Pty) Ltd	2012/190290/07
Vukani Gaming Corporation (Pty) Ltd	1995/000842/07
Vukani Gaming Eastern Cape (Pty) Ltd	1997/009974/07
Vukani Gaming Free State (Pty) Ltd	1997/009522/07
Vukani Gaming Gauteng (Pty) Ltd	1997/004845/07
Vukani Gaming KwaZulu Natal (Pty) Ltd	1997/004658/07
Vukani Gaming Limpopo (Pty) Ltd	1997/009399/07
Vukani Gaming Mpumalanga (Pty) Ltd	1996/016417/07
Vukani Gaming North West (Pty) Ltd	1997/009429/07
Vukani Gaming Northern Cape (Pty) Ltd	1997/009676/07
Vukani Gaming Western Cape (Pty) Ltd	1997/004824/07

#### **GALAXY BINGO**

Bingo Vision (Pty) Ltd	1997/004060/07
EC Gaming Uitenhage (Pty) Ltd	2012/136900/07
Galaxy Bingo Amanzimtoti (Pty) Ltd	2006/023591/07
Galaxy Bingo Bluff (Pty) Ltd	2006/023567/07
Galaxy Bingo Developments (Pty) Ltd	1997/019595/07
Galaxy Bingo Durban CBD (Pty) Ltd (Dormant)	2006/023746/07
Galaxy Bingo East London (Pty) Ltd	2012/136888/07
Galaxy Bingo East Rand Mall (Pty) Ltd	1997/019566/07
Galaxy Bingo Emalahleni (Pty) Ltd	2015/285648/07
Galaxy Bingo Empangeni (Pty) Ltd	2006/021556/07
Galaxy Bingo Gateway (Pty) Ltd	2006/018287/07
Galaxy Bingo Greenstone (Pty) Ltd	1997/019596/07
Galaxy Bingo Hazyview (Pty) Ltd	2015/165671/07
Galaxy Bingo International South Africa (Pty) Ltd	1997/019569/07
Galaxy Bingo Invest 4 (Pty) Ltd (Dormant)	2015/309533/07
Galaxy Bingo Invest 5 (Pty) Ltd (Dormant)	2015/279030/07
Galaxy Bingo Klerksdorp (Pty) Ltd	2024/531003/07
Galaxy Bingo KwaZulu-Natal (Pty) Ltd	2006/018152/07
Galaxy Bingo KWT (Pty) Ltd	1997/005815/07
Galaxy Bingo Midlands (Pty) Ltd	2006/021491/07
Galaxy Bingo Moruleng (Pty) Ltd	2013/195636/07

Galaxy Bingo North West (RF) (Pty) Ltd	2009/008844/07
Galaxy Bingo Pavilion (Pty) Ltd	2006/021677/07
Galaxy Bingo Port Elizabeth (Pty) Ltd	2012/136896/07
Galaxy Bingo South Coast (Pty) Ltd	2006/018164/07
Galaxy Bingo Tonga (Pty) Ltd	2015/250835/07
Galaxy Bingo Tzaneen (Pty) Ltd	2012/190282/07
Galaxy Gaming and Entertainment (Pty) Ltd	2007/026773/07
Galaxy Gaming Eastern Cape (Pty) Ltd	2012/136886/07
Galaxy Gaming Limpopo (Pty) Ltd	2006/021500/07
Galaxy Gaming Nelspruit (Pty) Ltd	2008/001398/07
K2013049718 (South Africa) (RF) (Pty) Ltd	2013/049718/07
K2022775564 (South Africa) (Pty) Ltd	2022/775564/07
K2022780844 (South Africa) (Pty) Ltd	2022/780844/07
K2022775622 (South Africa) (Pty) Ltd	2022/775622/07
K2022775605 (South Africa) (Pty) Ltd	2022/775605/07
K2023969249 (South Africa) (Pty) Ltd	2023/969249/07
Leitlho SPV (Pty) Ltd	2012/123703/07
NC Gaming (Pty) Ltd	2006/018619/07
One Vision Investments 451 (Pty) Ltd	2010/018448/07
The Marco Polo Gaming (Pty) Ltd	1997/019578/07
Tsogo Sun Alternative Gaming Invest 1 (Pty) Ltd	2012/190286/07
Betcoza Online (Pty) Ltd	2010/005430/07
Cherry Moss Trade and Invest 188 (Pty) Ltd	2008/003167/07
K2022775584 (South Africa)	2022/775584/07
Niveus Invest9 (Pty) Ltd	2014/034932/07
Niveus Invest11 (Pty) Ltd	2014/034924/07
Sport Gaming Africa (Pty) Ltd	2012/125136/07
Vbetsa Limpopo (Pty) Ltd	2012/125120/07