



Registration Number of Company: 2015/284421/07

**BridgloT (RF) (Pty) Ltd
("BridgloT" or "the Company")**

**MANUAL
in terms of Section 51 of
The Promotion of Access to Information Act**

2 of 2000

(the "Act")

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1. INTRODUCTION TO BRIDGIOT

BridgloT is a technology company specialising in the integration and development of Internet of Things solutions. Our primary focus is on the monitoring and control of household utilities, allowing end-users to unlock substantial savings and benefits.

2. PURPOSE OF THIS MANUAL

This manual has been completed in accordance with the Promotion of Access to Information Act 2 of 2000 (“PAIA”) and the Protection of Personal Information Act 4 of 2013 (“POPIA”).

The purpose of this manual is to facilitate requests for access to information which BridgloT holds as well as for requests permitted to data subjects under POPIA.

A “data subject” as defined in POPIA means the person to whom personal information relates and includes a natural or a juristic person.

This manual does not deal comprehensively with every procedure provided for in PAIA or POPIA and BridgloT implores requesters of information to familiarise themselves with the provisions of these acts before making any requests for information to BridgloT under the provisions of these acts.

BridgloT makes no representation and gives no undertaking or warranty that the information provided by it to a requester is complete or accurate, or that such information is fit for any purpose. All users of such information shall use such information entirely at their own risk. BridgloT shall not be liable for any loss, expense, liability or claims, regardless of how they arise, resulting from the use of this manual or any information provided by BridgloT or any error therein.

3. INFORMATION OFFICER CONTACT DETAILS

Company name	BridgloT (RF) (Pty) Ltd
Registration Number	2015/284421/07
Information Officer	Arno Scholtz (General Manager & Interim Chief Executive Officer)
Street Address	Time Square Building, 12 Elektron Road, Techno Park, Stellenbosch, 7600, Western Cape, South Africa.
Postal Address	P.O. Box 3135, Matieland, 7599, Western Cape, South Africa.
Telephone	(021) 201-6939
e-mail	legal@bridgiot.co.za
Website	www.bridgiot.co.za

4. INFORMATION REGULATOR CONTACT INFORMATION

The Information Regulator oversees compliance with both PAIA and POPIA, the details of which are as follows:

Street Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.
Postal Address	The Information Regulator (South Africa) P.O. Box 31533, Braamfontein, Johannesburg, 2017.
Telephone	Refer to Information Regulator website
Complaints e-mail	POPIAComplaints.IR@justice.gov.za and PAIAComplaints.IR.@justice.gov.za
General inquiries e-mail	infoereg@justice.gov.za
Website	www.bridgiot.co.za

5. CATEGORIES OF RECORDS THAT MAY BE REQUESTED

Please take note that there are several grounds for refusal of access to records.

Records	Subject	Availability
Administration	<ol style="list-style-type: none"> 1. Founding Documents 2. Minutes of Management Meetings 3. Minutes of Operations Meetings 4. Shareholder Register 5. Statutory Returns 6. BEE Status 7. SARS Certificate 8. CIPC Certificate 	<ol style="list-style-type: none"> 1. Request in terms of PAIA. 2. Request in terms of PAIA. 3. Request in terms of PAIA. 4. Request in terms of PAIA. 5. Request in terms of PAIA. 6. Free access via request. 7. Free access via request. 8. Free access via request.
Human Resources	<ol style="list-style-type: none"> 9. Conditions of Service 10. Employee Records 11. Employment Contracts 12. Employment Equity Records 13. Industrial and Labour Relations Records 14. Health and Safety Regulations 15. Pension and Provident Fund Records 16. Performance Appraisals 17. Personnel Guidelines, Policies and Procedures 18. Skills Requirements 19. Staff Recruitment Policies 20. Statutory Records 21. Training Records 	<ol style="list-style-type: none"> 9. Request in terms of PAIA. 10. Request in terms of PAIA. 11. Request in terms of PAIA. 12. Request in terms of PAIA. 13. Request in terms of PAIA. 14. Request in terms of PAIA. 15. Request in terms of PAIA. 16. Request in terms of PAIA. 17. Request in terms of PAIA. 18. Request in terms of PAIA. 19. Request in terms of PAIA. 20. Request in terms of PAIA. 21. Request in terms of PAIA.
Financial	<ol style="list-style-type: none"> 22. Financial Statements 23. Financial and Tax Records (Company & Employees) 24. Asset Register 25. Banking Records 26. Budgets 27. Contracts 28. Financial Transactions 29. General Correspondence 	<ol style="list-style-type: none"> 22. Request in terms of PAIA. 23. Request in terms of PAIA. 24. Request in terms of PAIA. 25. Request in terms of PAIA. 26. Request in terms of PAIA. 27. Request in terms of PAIA. 28. Request in terms of PAIA. 29. Request in terms of PAIA.

	30. Insurance Information 31. Management Accounts 32. Purchase and Order Information	30. Request in terms of PAIA. 31. Request in terms of PAIA. 32. Request in terms of PAIA.
Sales and Marketing	33. Public Product Information 34. Media Releases 35. Product Brochures 36. Product Manuals 37. Contracts 38. General Correspondence 39. Information relating to Employee Sales Performance 40. Marketing and Future Strategies 41. Marketing Records 42. Sales Records 43. Market Information 44. Performance Records 45. Product Sales Records	33. Available at www.bridgiot.co.za 34. Available at www.bridgiot.co.za 35. Free access via request. 36. Free access via request. 37. Request in terms of PAIA. 38. Request in terms of PAIA. 39. Request in terms of PAIA. 40. Request in terms of PAIA. 41. Request in terms of PAIA. 42. Request in terms of PAIA. 43. Request in terms of PAIA. 44. Request in terms of PAIA. 45. Request in terms of PAIA.
Information Technology	46. IT Policies and Procedures 47. User Manuals	46. Request in terms of PAIA. 47. Request in terms of PAIA.

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Records are kept and are available upon specified conditions in accordance with such other legislation as is applicable to BridgIoT, including:

Company Secretarial and Legal

- Companies Act 71 of 2008 (as amended)
- Copyright Act 98 of 1978
- Competition Act 89 of 1998
- Consumer Protection Act 68 of 2008
- Customs and Excise Act 91 of 1964

Accounting and Finance

- Income Tax Act 95 of 1967
- Revenue Laws Amendment Act 60 of 2008
- Value Added Tax Act 89 of 1991

Human Resources

- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Employment Equity Act 55 of 1998
- Skills Development Levies Act 9 of 1999
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Occupational Health and Safety Act 85 of 1993
- Unemployment Insurance Act 63 of 2001
- Environmental Health and Safety Act 1989

7. PURPOSE OF PROCESSING PERSONAL INFORMATION

The proper functioning of BridgIoT as an organisation requires us to process certain personal information. The purpose for which information is processed will depend on the nature of the information and the particular data subject. This purpose is ordinarily disclosed either explicitly or implicitly at the time when the information is processed and generally includes the following:

To provide products and services which form part of the ordinary course of operations of BridgIoT

- To provide after-sales service and maintenance of existing products and services which form part of the ordinary course of operations of BridgIoT
- To provide employment to our employees and to interact with them in the context of the employment relationship.
- To improve our service to you by analysing it for trends.
- For record-keeping purposes in terms of legislation.
- Any other reason which is integral to our functioning properly as an organisation.

8. CATEGORIES OF DATA SUBJECTS AND RELATED INFORMATION

BridgIoT processes the personal information of the following categories of data subjects:

- Employees
- Suppliers
- Customers
- Job applicants
- Consultants
- Contractors
- End-users

A further breakdown of the types of information we process and the reasons for processing of this information is summarised in the following table:

Type of information	Why we process this information
Identifying and age information, e.g., name, surname, ID number	To identify the employees, consultants, and job applicants we interact with. ID numbers of suppliers (if applicable), customers (if applicable) or contractors (if applicable) are not processed as well as visitors to the office (in compliance with COVID-19 regulations).
Unique identifier (EMIS number) assigned to schools by the Western Cape Education Department.	To identify the schools that we interact within the course of ordinary operations, such as for submitting Subsidy Applications to the Western Cape Education Department on behalf of a school.
Information relating to gender, nationality and ethnicity of employees	To report legally required statistics to the Department of Labour.
Financial information relating to our employees, suppliers or contractors	To provide employment-related benefits or remuneration to our employees, or to screen potential employees; or to pay suppliers or contractors; or to perform credit checks.
Contact information, e.g., telephone numbers, email addresses, etc.	To contact the data subject if necessary, in the performance of our duties in the ordinary course of operations, such as notifications or reporting via SMS and email.
Geographic location of customers, e.g., Street Address, Latitude & Longitude	To identify the location(s) at which we need to install our products, conduct site inspections, perform maintenance or replacements, delivery or pickup related, or attend meetings.

Images, video footage and audio clips from the office	To secure our premises.
Device-specific information (e.g., temperature, power measurements, drip detection signals, water meter measurements & details, geyser details)	To perform our services during the normal course of business. Corroboration of warranty information Comparison of measured water meter data with municipal bills.

9. CATEGORIES OF RECIPIENTS OF PERSONAL INFORMATION

Depending on the nature of the personal information, BridgIoT may supply information or records to the following categories of recipients:

- It may be necessary for us to disclose or transfer personal information to suppliers, partners, or agents under contract to provide our products or services to customers in the ordinary course of operations and have agreements in place with these persons or entities which uphold the confidentiality of a customer's personal information.
- For example, to install our products at the premises of a customer, we utilise the services of approved suppliers. We take extreme caution to only supply information which is necessary for the supply of our products and services.
- We need to disclose personal information to employees who require it to perform their day-to-day responsibilities. We make sure all employees are aware of and take their confidentiality obligations seriously. Employees are contractually bound to keep all personal and confidential information confidential.
- There may be situations where the law requires us to disclose personal information. In all other situations, we will not disclose personal information without notifying a data subject and enabling the data subject to object.

10. PLANNED TRANSBORDER FLOW OF INFORMATION

BridgIoT currently utilises several third-party operators situated outside the Republic for the hosting of customer data, providing core infrastructure services, and for additional purposes which entails the processing of personal information.

As these third-party processors operate in multiple countries, information might be transmitted or transferred outside of South Africa to a foreign country and processed in that country. Although we take great care in selecting our third-party processors, personal information may be stored on servers located outside South Africa in a foreign country whose laws protecting personal information may not be as stringent as those in South Africa.

11. SECURITY MEASURES IN PLACE

BridgIoT has implemented appropriate technical and organisational security measures designed to protect personal information against accidental or unlawful destruction, loss, alteration, disclosure, access and other unlawful or unauthorised forms of processing in terms of our internal organisational controls, information security controls and other measures.

It must be noted that the internet is an open and often vulnerable system and the transfer of information via the internet is not completely secure. Although BridgIoT will implement all reasonable

measures to protect personal information, we cannot guarantee the security of Personal Information transferred to us using the internet.

12. AVAILABILITY OF THE MANUAL

This Manual is available for inspection as follows:

- BridgloT website; and
- BridgloT Offices.

13. MAKING A REQUEST FOR ACCESS TO INFORMATION

13.1 The request procedure

To facilitate the processing of the request, kindly:

- Use the prescribed form as per ANNEXURE A – PRESCRIBED FORMS.
- In addition to the prescribed form, requesters will be required to supply a certified copy of their identification document or any other legally acceptable form of identification.
- Address the request to the Information Officer at the address or e-mail address already provided (unless the online form is being completed).
- Provide sufficient details to enable BridgloT to identify the following:
 - (a) record(s) requested;
 - (b) requester (and if an agent is lodging the request, proof of capacity);
 - (c) the form of access required;
 - postal address or facsimile number of the requester in the Republic;
 - if the requester wishes to be informed of the decision in any manner (in addition to written), the manner and particulars thereof;
 - (d) the right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

13.2 Notification

Requesters will be informed within 30 days if BridgloT's decision is to refuse access to the information requested based on any of the grounds for refusal as contemplated in the Act. Take note that the 30-day period may be extended for a further 30-day period should more time be required to gather the requested information. The requester will, however, be notified if the initial 30-day notice period is to be extended for a further 30 days.

13.3 Payment of Prescribed Fees

The following applies to requests (other than personal requests):

- A requester is required to pay the prescribed fees (R50,00) before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- Records may be withheld until the fees have been paid.
- Requesters are required to pay fees for accessing the records and include fees for the search, preparation, and reproduction of the documents.
- The fees are as follows:

(a)	For every photocopy of an A4-size page or part thereof	R1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine- readable form	R0,75
(c)	For a copy in a computer-readable form on a compact disc	R70,00
(d)	i. For a transcription of visual images, for an A4-size page or part thereof	R40,00
	ii. For a copy of visual	R60,00
(e)	i. For a transcription of an audio record, for an A4-size page or part thereof	R20,00
	ii. For a copy of an audio record	R30,00
(f)	To search for and prepare the record for disclosure for each hour or part of an hour reasonably required for such search and preparation.	R30,00
(g)	The postage payable when a copy of record must be posted to a requester.	Actual

14. DATA SUBJECT RIGHTS UNDER POPIA

POPIA grants the following rights to a data subject after providing proof of identity that allows the data subject to request:

- Confirmation, free of charge whether personal information is kept about the data subject.
- Request the record or a description of the personal information about the data subject held, including information about the identity of all third parties, or categories of third parties, who have, or have, had access to the information.

On the latter if a fee is payable for the services rendered a written estimate of the fee must be provided, before providing the service and a deposit might be payable.

Furthermore, a data subject may in the prescribed manner or a form that is similar (please see ANNEXURE A – PRESCRIBED FORMS):

- Object to the processing of personal information in terms of section 11(3).
- Request in terms of section 24(1) for the:
 - Correction or deletion of 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
 - Destroying or deletion of a record of personal information about the data subject that BridgIoT is no longer authorised to retain.

BridgIoT has an obligation to retain personal information as required in the respective laws and regulations that are applicable to us. Any request would, therefore, first need to be assessed terms of the retention requirements.

15. PRESCRIBED FORMS

The respective regulations refer to the forms that are to be completed. Where the form is not completed any form which is substantially similar to the form required is to be completed. Please see ANNEXURE A – PRESCRIBED FORMS in this regard.

ANNEXURE A – PRESCRIBED FORMS

The following prescribed forms should be used if you wish to exercise any of your rights described in this Manual. Please use the appropriate form based on the nature of the right you are exercising.

1. **FORM C** - Request for Access to a Record of BridgIoT (PAIA);
2. **FORM 1** - Object to the processing of your personal information (POPIA); or
3. **FORM 2** - Request for correction, deletion, or destruction of personal information (POPIA).

NEED TO ADD LINKS OR SHOW WHERE THEY CAN BE FOUND ON THE WEBSITE.