SECTION 51(1) MANUAL IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO 2 OF 2000, AS AMENDED

GROW BUSINESS COACHING PROPRIETARY LIMITED

(Registration number: 2014/039222/07)

TABLE OF CONTENTS

Initial here

SECTION 51(1) MANUAL IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO 2 OF 2000, AS AMENDED

1. Introduction

1.1. In terms of the preamble thereto, the Promotion of Access to Information Act, no 2 of 2000, as amended ("***PAIA***") was enacted to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights.

1.2. Grow Business Coaching Proprietary Limited ("***Grow***") is a ***private body*** as defined in PAIA. As such, Part 3 of PAIA (sections 50 to 73) applies to the access to Grow's records.

1.3. In terms of section 51 of PAIA, a private body must make a manual, which must contain certain prescribed information, available on its website, at its principal place of business for public inspection during normal business hours, to any person upon request and upon the payment of a reasonable amount, and to the Information Regulator upon request ("***the Manual***").

1.4. The Effective Date of the Manual is 1 January 2025. In terms of section 51(2), the Head of Grow shall update the Manual on a regular basis

1.5. Unless otherwise specified, all sections referred to in the Manual refer to sections of PAIA.

2. The Right of Access to Records of Private Bodies (Section 50)

2.1. A "***requester***" in relation to a private body means *"any person, including but not limited to, a public body or an official thereof, making a request for access to a record of that private body, or a person acting on behalf of the aforementioned person"*.

Initial here

2.2. A requester **must** be given access to any record of a private body if:

2.2.1. that record is required for the exercise or protection of any rights;

2.2.2. the requester complies with the procedural requirements in PAIA relating to a request for access to that record (as summarised in paragraph 6 hereof); and

2.2.3. access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of Part 3 of PAIA (as summarised in paragraph 7 hereof).

2.3. If a requester is a public body (as defined in PAIA), that public body must, in addition to the abovementioned requirements, be acting in the public interest.

2.4. A request referred to in paragraph 2.2 hereof includes a request for access to a record containing the requester's personal information or the personal information of the person on whose behalf the request is being made.

Section 51(1)(a): GENERAL INFORMATION

3. The Heads of Grow

3.1. The required details of the heads of Grow are as follows:

Full names:	Graham Andrew Mitchell
Postal Address	Same as physical address
Street Address	7 The Curve, Riverclub, Sandton, 2191
Phone number	011 234 3453
Fax number	n/a
Email address	info@grow-za.com

And

Initial here

Full names:	Andrew Aitken
Postal Address	Same as physical address
Street Address	7 The Curve, Riverclub, Sandton, 2191
Phone number	011 234 3453
Fax number	n/a
Email address	info@grow-za.com

3.2. The heads of Grow shall also serve as Grow's ***Information Officers***

Section 51(1)(b) of PAIA: Information required in terms of PAIA

4. The Guide on how to use PAIA (as read with Section 10)

4.1. The Information Regulator has compiled a guide containing such information, in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any rights contemplated in PAIA.

4.2. The guide, and all information relating to PAIA can be found online at: https://inforegulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

5. Categories of Grow's Records (read with section 52(2))

5.1. Grow holds the following records:

5.1.1. Grow's corporate documents, including its incorporation documents, memorandum of incorporation (as amended from time to time), directors' information, and records relating to the provisions and requirements of the Companies Act, 71 of 2008, as amended;

5.1.2. independent contractors' information (some of which is protected by the provisions of the Protection of Private Information Act, no 4 of 2013, as amended ("***POPI***"));

Initial here

5.1.3. client information (some of which is protected by the provisions of POPI);

5.1.4. financial records, including audited annual financial statements, the books and records of account and the source documents informing same, banking records and tax records, including records relating to the provisions and requirements of the Income Tax Act, 58 of 1962, as amended, the South African Revenue Services Act, no 34 of 1997, as amended, and the Value-Added Tax Act, no 89 of 1991, as amended;

5.1.5. to the extent that Grow has employees, employee records (some of which is protected by the provisions of POPI), and statutory human resources records, including records relating to the provisions and requirements of the Basic Conditions of Employment Act, no 75 of 1997, as amended, the Employment Equity Act, no 55 of 1998, as amended, the Labour Relations Act, no 66 of 1995, as amended, and the Occupational Health and Safety Act, no 85 of 1993, as amended;

5.1.6. meeting records, including notices, agendae, resolutions and minutes;

5.1.7. general correspondence;

5.1.8. such records as are required to be held in terms of the Constitution of the Republic of South Africa, no 3 of 1994, as amended.

5.2. Access to all Grow's records must be requested in terms of PAIA, and as described in this Manual.

6. Request for access to Grow's Records (read with Sections 53- 61)

Form of Request

6.1. When a request for access to a record of Grow is made, such request must be made in writing in the prescribed format, being Form 2 of Annexure A to the Regulations relating to the Promotion of Access to Information, 2021 ("***the Regulations***"), attached hereto ("***Form 2***"). The online version of Form 2 can be found at: https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf or a hard copy can be collected from the street address set out in clause 3.1 hereof.

6.2. Form 2 must be completed clearly and completely in block letters. In the event that Form 2 does not have sufficient space on which to answer a question, such question can be answered on a separate page that is clearly marked and properly referenced.

6.3. The completed Form 2 must be sent to one of the Heads of Grow (who, as stated above, shall serve as Grow's Information Officers) by delivery thereof to the street address set out in clause 3.1 hereof or by electronic mail to one of the email addresses set out in clause 3.1 hereof. In both instances, proof of payment of the prescribed Request Fee (as set out in clause 6.5.1 hereof) must accompany such written request.

6.4. The completion and submission of Form 2 does not automatically allow the requester access to the requested record.

Fees

6.5. In terms of the Regulations, Grow is entitled to charge the following fees in respect of any requests for records made in terms of PAIA:

Initial here

6.5.1.	Request fee payable by every requester	R140.00
6.5.2.	Photocopy / printed black & white copy of A4 size page	R2.00 per page or part thereof
6.5.3.	Printed copy of A4 size page	R2.00 per page or part thereof
6.5.4.	For a copy in a computer-readable form on Flash Drive (to be provided by requestor)	R40.00
6.5.5.	For a transcript of visual images per A4 size page	Service to be outsourced. Will depend on quotation from service provider
6.5.6.	Copy of a visual image	
6.5.7.	Transcription of an audio record, per A4 size page	R24.00
6.5.8.	Copy of an audio record on Flash drive (to be provided by requestor)	R40.00
6.5.9.	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.	R145.00
	To not exceed a total cost of	R435.00
6.5.10.	Deposit if search exceeds 6 hours	One third of amount per request calculated

Initial here

		in term of aforementioned items
6.5.11.	Postage, email or any other electronic transfer	Actual expense, if any

6.6. Upon receipt by one of the Heads of Grow for access, the requester shall be given notice to pay the prescribed Request Fee before further processing the request.

6.7. If, in the opinion of the Head of Grow, the search for any record requested, and the preparation of the record for disclosure, would require more than the hours prescribed for this purpose as set out in paragraph 6.5.10 hereof, the head shall notify the requester to pay as a deposit the prescribed portion of the access fee (as set out in paragraph 6.5.10) which would be payable if the request is granted. If access is ultimately refused, the deposit shall be repaid to the requester.

6.8. The notice referred to in paragraph 6.6 and 6.7 hereof shall comply with the requirements of section 54(3).

6.9. The record requested may be withheld until the requester has paid the applicable fees.

Records that cannot be found or do not exist

6.10. If all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record is in the private body's possession but cannot be found, or does not exist, the Head of Grow must, by way of affidavit or affirmation, notify the requester that it is not possible to give access to that record, and in such affidavit or affirmation, give a full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communications with every person who conducted the search on behalf of the Head. For purposes of PAIA, this shall be regarded as a decision to refuse a request for access to the record concerned.

Initial here

6.11. If, after notice is given in terms of paragraph 0 hereof, the record in question is found, the requester concerned must be given access to the record unless access is refused on a ground for refusal contemplated in Chapter 4 of Part 3 of PAIA (as detailed in paragraph 7 hereof).

Decision on request and notice thereof

6.12. Except if the provisions regarding third party notification and intervention contemplated in Chapter 5 of Part 3 apply (as set out in paragraph 9 hereof), the Head of Grow must, as soon as reasonably possible, but in any event within 30 days after the request has been received ("***the original period***"), decide in accordance with PAIA whether to grant the request, and notify the requester of the decision.

6.13. If the request for access is granted, the notice referred to in paragraph 6.12 must state:

6.13.1. the access fee (if any) to be paid upon access;

6.13.2. the form in which access will be given; and

6.13.3. that the requester may lodge a complaint to the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint to the Information Regulator or the application.

6.14. If the request for access is refused, the notice referred to in paragraph 6.12 must:

6.14.1. State adequate reasons for the refusal, including the provisions of PAIA relied on;

6.14.2. exclude, from any such reasons, any reference to the content of the record; and

Initial here

6.14.3. state that the requester may lodge a complaint to the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint to the Information Regulator or the application.

6.15. The Head of Grow may extend the original period once for a further period of not more than 30 days, if-

6.15.1. the request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with Grow's activities;

6.15.2. the request requires a search for records in, or collection thereof from, Grow's office not situated in the same town or city as the office of the Head that cannot reasonably be completed within the original period;

6.15.3. consultation among divisions of Grow or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original period; or

6.15.4. the requester consents in writing to such extension.

6.16. If the original period is extended as described in paragraph 6.15 hereof, the Head of Grow must, as soon as reasonably possible, but in any event within 30 days, after the request is received, notify the requester of that extension, the period of the extension and the reasons for the extension, including the provisions of PAIA relied upon. This notice must also state that the requester may lodge a complaint to the Information Regulator or an application with a court against the extension, and the procedure (including the period) for lodging the application.

6.17. If the Head of Grow fails to give the decision on a request for access to the requester concerned within the original period, the Head of Grow is, for the purposes of PAIA, regarded as having refused the request.

Severability

6.18. If a request for access is made to a record of Grow that contains information which **may** or **must** be refused in terms of any provision of Chapter 4 of Part 3 (as more fully set out in paragraph 7 hereof), every part of that record which does not contain any such information, and which can reasonably be severed from any part that contains any such information, must be disclosed.

6.19. If a request for access to a part of a record is granted and the other part of the record is refused as contemplated in paragraph 6.18 hereof, the provisions of paragraphs 6.12 to 6.14 hereof shall apply.

Form of access

6.20. If access is granted to a Grow record, the Head of Grow must, as soon as reasonably possible after notification in terms of paragraph 6.12 hereof, give access in such form as the requester reasonably requires, or if no specific form of access is required by the requester, such form as the Head reasonably determines.

Access to health or other records

6.21. If the Head of Grow grants a request for access to a record provided by a health practitioner in his or her capacity as such about the physical or mental health, or well-being of the requester, or if the request has been made on behalf of the person to whom the record relates, of that person (collectively, "***the relevant person***"), and is of the opinion that the disclosure of the record to the relevant person might cause serious harm to his or her physical or mental health, or well-being, the

Head may, before giving access, consult with a health practitioner who, subject to paragraph 6.22 hereof, has been nominated by the relevant person.

6.22. If the relevant person is:

6.22.1. under the age of 16 years, a person having parental responsibilities for the relevant person must make the nomination contemplated in paragraph 6.21 hereof, or

6.22.2. incapable of managing his or her affairs, a person appointed by the court to manage those affairs must make that nomination.

6.23. If, after being given access to the record concerned, the health practitioner consulted in terms of paragraph 6.21 hereof is of the opinion that the disclosure of the record to the relevant person, would be likely to cause serious harm to his or her physical or mental health, or well-being, the Head may only give access to the record if the requester proves to the satisfaction of the Head that adequate provision is made for such counselling or arrangements as are reasonably practicable before, during or after the disclosure of the record to limit, alleviate or avoid such harm to the relevant person.

6.24. Before access to the record is given to the requester, the person responsible for such counselling or arrangements must be given access to the record.

7. Grounds for refusal of access to Records (Sections 62-69)

7.1. Subject to the provisions of paragraph 8 hereof, the Head **must** refuse a request for access to a Grow record under the following circumstances:

7.1.1. if its disclosure would involve the unreasonable disclosure of personal information about a third party, including a deceased individual; except if the record falls into one of the exceptions referred to in section 63(2);

Initial here

7.1.2. if the record contains:

7.1.2.1. trade secrets of a third party;

7.1.2.2. financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party; or

7.1.2.3. information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations, or to prejudice that third party in commercial competition,

except if the record falls into one of the exceptions referred to in section 64(2) as read with section 64(3).

7.1.3. of a Grow record if its disclosure:

7.1.3.1. would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement.

7.1.3.2. could reasonably be expected to endanger the life or physical safety of an individual; or

7.1.4. if the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.

7.1.5. if the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose the third party, or a person that is or will be carrying out the research on behalf of the third party, or the subject matter of the research, to serious disadvantage.

Initial here

7.2. The Head **may** refuse a request for access to a Grow record under the following circumstances:

7.2.1. if its disclosure would be likely to prejudice or impair:

7.2.1.1. the security of a building, structure or system (including, but not limited to, a computer or communication system), a means of transport, or any other property

7.2.1.2. methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public.

7.2.2. if the record contains:

7.2.2.1. Grow's trade secrets -

7.2.2.2. Grow's financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to Grow's commercial or financial interests;

7.2.2.3. information, the disclosure of which could reasonably be expected to put Grow at a disadvantage in contractual or other negotiations, or to prejudice Grow in commercial competition.

7.2.3. If the record is a computer program, as defined in section 1 (1) of the Copyright Act 98 of 1978, owned by Grow, except insofar as it is required to give access to a record to which access is granted in terms of PAIA.

7.2.4. if the record contains information about research being or to be carried out by or on behalf of Grow, the disclosure of which would be likely to expose Grow, or a person that is or will be

Initial here

carrying out the research on behalf of Grow, or the subject matter of the research, to serious disadvantage.

8. Mandatory disclosure in public interest (section 70)

8.1. The Head of Grow must grant a request for access to a Grow record contemplated in paragraph 7.1 hereof if:

8.1.1. the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with, the law, or imminent and serious public safety or environmental risk; and

8.1.2. the public interest in the disclosure of the record clearly outweighs the harm contemplated in the provisions relating to paragraph 7.1 hereof.

9. Third Party Notification and Intervention (Sections 71-73)

Notice to third parties

9.1. The Head of Grow considering a request for access to a record that might be a record contemplated in paragraphs 7.1.1, 7.1.2, 7.1.4 and 7.1.5, must take all reasonable steps to inform a third party to whom or which the record relates of the request as soon as reasonably possible, but in any event within 21 days after that request is received, and by the fastest means reasonably possible.

9.2. When informing a third party in terms of paragraph 9.1 hereof, the Head must:

9.2.1. state that he or she is considering a request for access to a record that might be a record contemplated in paragraphs 7.1.1, 7.1.2, 7.1.4 and 7.1.5, as the case may be, describe the provisions of paragraphs 7.1.1, 7.1.2, 7.1.4 and 7.1.5, as the case may be, and describe the content of the record;

Initial here

9.2.2. furnish the name of the requester;

9.2.3. in any case where the Head believes that the provisions of paragraph 8 hereof might apply, describe those provisions, specify which of the circumstances referred to in paragraph 8 hereof in the opinion of the Head might apply and state the reasons why he or she is of the opinion that paragraph 8 hereof might apply;

9.2.4. state that the third party may, within 21 days after the third party is informed:

9.2.4.1. make written or oral representations to the Head why the request for access should be refused; or

9.2.4.2. give written consent for the disclosure of the record to the requester.

9.3. If a third party is informed orally of a request for access in terms of paragraph 9.1 hereof, the Head must give a written notice stating the matters referred to in paragraph 9.2 hereof to the third party.

Representations and consent by third parties

9.4. A third party that is informed in terms of paragraph 9.1 hereof of a request for access, or a third party that obtains knowledge about a request for access other than in terms of paragraph 9.1 hereof, may, in the former case, within 21 days after being so informed:

9.4.1. make written or oral representations to the Head why the request should be refused; or

9.4.2. give written consent for the disclosure of the record to the requester concerned.

Initial here

Decision on representations for refusal and notice thereof

9.5. The Head of Grow must, as soon as reasonably possible, but in any event within 30 days after every third party is informed as required by paragraph 9.1 hereof:

9.5.1. decide, after giving due regard to any representations made by a third party in terms of paragraph 9.4 hereof, whether to grant the request for access;

9.5.2. notify the third party, whether informed in terms of paragraph 9.1 hereof or not, of the decision; and

9.5.3. notify the requester of the decision

9.6. If, after all reasonable steps have been taken as required by paragraph 9 hereof, a third party is not informed of a request, any decision whether to grant the request for access must be made with due regard to the fact that the third party did not have the opportunity to make representations as to why the request should be refused.

9.7. If the request is granted, the notice in terms of paragraph 9.5.2 must state-

9.7.1. adequate reasons for granting the request, including the provisions of PAIA relied upon to justify the granting;

9.7.2. that the third party may lodge a complaint to the Information Regulator or an application with a court against the decision of the head within 30 days after notice is given, and the procedure for lodging the complaint to the Information Regulator or the application; and

Initial here

9.7.3. that the requester will be given access to the record after the expiry of the period contemplated in paragraph 9.7.2 hereof unless a complaint to the Information Regulator or an application with a court is lodged within that period.

9.8. If the head of the private body decides to grant the request for access concerned, he must give the requester access to the record concerned after the expiry of 30 days after notice is given in terms of paragraph 9.7.2 hereof, unless a complaint to the Information Regulator or an application with a court is lodged against the decision within that period.

Section 51(1)(c) of PAIA: Information required in terms of POPI

10. **Definitions**

10.1. Several terms that are used in this section of the Manual are defined in POPI. These terms are:

10.1.1.	*"Data Subjects"*	the person to whom Personal Information relates
10.1.2.	*"Personal Information"*	information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to – • information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

Initial here

- Information relating to the education or the medical, financial, criminal or employment history of the person;

- Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;

- The biometric information of the person;

- The personal opinions, views or preferences of the person;

- Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

- The views or opinions of another individual about the person;

- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

Initial here

10.1.3. ***"Processing"*** any operation or activity or any set of operations, whether or not by automatic means, concerning personal information including:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- Dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information

and "***Process***" and "***Processed***" shall have consistent meanings.

10.1.4. "***Special Personal Information***" Personal Information as referred to in section 26 of POPI, and refers to the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject

Initial here

11. The Purpose of Grow Processing Personal Information

11.1. Grow is committed to processing its clients' Personal Information in a lawful, relevant and transparent manner. Accordingly, Grow Processes only the clients' Personal Information for the following purposes:

11.1.1. to market and grow Grow's business;

11.1.2. to render its services to its Clients;

11.1.3. in the course of rendering its services to its Clients, and to manage coaching relationships.

12. Data Subjects and the Information relating thereto

12.1. Grow Processes the Information of the following Data Subjects:

12.1.1. Grow;

12.1.2. Grow's clients, which are juristic persons;

12.1.3. the individuals comprising the respective management and/or leadership teams of its clients,

12.1.4. employees of its clients who are not necessarily part of the client's management and/or leadership teams;

12.1.5. occasionally, the Personal Information relating to family members of the individuals comprising the respective management and/or leadership teams of its clients;

12.1.6. Grow's employees;

12.1.7. Grow's independent contractors and service providers.

Initial here

12.2. Grow currently Processes the following categories of Personal Information as a matter of course (in alphabetical order):

12.2.1. Biometrics* (defined in POPI as being "a technique of personal identification that is based on physical, physiological or behavioural characterization, including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition") and, for purposes of this document, includes images;

12.2.2. Correspondence sent by a person that is implicitly or explicitly of a private or confidential nature;

12.2.3. Email Address;

12.2.4. Personal opinions, views or preferences*;

12.2.5. Physical Address;

12.2.6. Telephone number;

12.2.7. The name of a person if it appears with other Personal Information relating to the person, or if the disclosure of the name itself would reveal information about the person (note that the name of a Data Subject on its own is not regarded as being Personal Information);

12.2.8. Unique identifier (eg: ID number / symbol).

12.3. In addition, Grow's employees and independent contractors may, through the work they do with Grow's clients and their respective leadership teams, from time to time obtain (and therefor Process) the following Personal Information (in alphabetical order):

12.3.1. Age;

Initial here

12.3.2. Belief*;

12.3.3. Birth;

12.3.4. Children* – any information relating thereto;

12.3.5. Colour*;

12.3.6. Culture*;

12.3.7. Disability*;

12.3.8. Education;

12.3.9. Ethnic / Social Origin*;

12.3.10. Ethnicity*;

12.3.11. Financial or credit information;

12.3.12. Gender;

12.3.13. Language*;

12.3.14. Location information;

12.3.15. Marital Status;

12.3.16. Medical*, Financial, Criminal* or Employment History;

12.3.17. Physical or mental health*;

Initial here

12.3.18. Pregnancy*;

12.3.19. Nationality*;

12.3.20. Race*;

12.3.21. Religion*;

12.3.22. Sex;

12.3.23. Sexual orientation*;

12.3.24. Views or opinions of another individual about the Data Subject;

12.3.25. Well-being*.

12.4. The Personal Information listed above marked with an asterisk (*) is considered in POPI to be "*special personal information*", and the Processing of this type of Personal Information is governed by section 26 of POPI, which places a general prohibition on the Processing of such special personal information, unless certain conditions are met.

13. The Recipients to whom Personal Information may be supplied

13.1. The nature of Grow's business requires its clients to share with Grow's employees and/or independent contractors certain Personal Information relating to the clients, their businesses and the individuals comprising their respective management and/or leadership teams.

13.2. The Personal Information is not shared with any third party by Grow without the express authority of its clients, and only for the purposes of rendering its services to the clients.

Initial here

14. Planned transborder flows of Personal Information

14.1. Grow utilises several systems and/or platforms in its business, some of which conduct business in Europe and the United States, and as such, Personal Information flows cross-borders ("***the Systems***").

15. Suitability of Information security measures

15.1. The systems and/or platforms comply with *inter alia*:

15.1.1. The General Data Protection Regulation ("***GDPR***") in force in the European Union;

15.1.2. the Federal Data Protection Act ("***FDPA***") in force in Germany;

15.1.3. SOC 2, a voluntary compliance standard for service organisations developed by the American Institute of CPAs, which specifies how organisations should manage customer data. The standard is based on the following Trust Services Criteria: security, availability, processing integrity, confidentiality and privacy.

15.1.4. CSA Group (formerly the Canadian Standards Association), a standards organisation which develops standards in 57 areas, including data protection. It is a voluntary certification.

15.1.5. Iso 27001, globally the best-known standard for information security management systems. Conformity with ISO 27001 means that an organisation has put in place a system to manage risks related to the security of data owned or handled by that organisation, and that this system respects all the best practices and principles enshrined in this international standard.

15.1.6. PCI certification, which ensures the security of card data at a user's business through a set of requirements established by the PCI SSC. These include a number of commonly known best

practices such as: installation of firewalls, encryption of data transmissions and the use of anti-virus software.

15.1.7. SOC 3, a public report of internal controls over security, availability, processing integrity and confidentiality.

THUS DONE and SIGNED at Johannesburg on this the 1st day of March 2025

In their capacity as the Heads of Grow:

GRAHAM ANDREW MITCHELL

ANDREW AITKEN