

HYDROFROTH (PTY) LTD

PAIA AND POPIA MANUAL

Prepared in accordance with
Section 51 of the Promotion of Access to Information Act No. 2 of 2000, as amended ("PAIA")
and
Section 17 of the Protection of Personal Information Act No. 4 of 2013, as amended ("POPIA")

1. INTRODUCTION

This PAIA and POPIA Manual ("**this Manual**") has been developed in compliance with the requirements of the Promotion of Access to Information Act No. 2 of 2000, as amended ("**PAIA**") and the Protection of Personal Information Act No. 4 of 2013, as amended ("**POPIA**"), and is intended to provide a comprehensive outline of the rights and obligations arising from these pieces of legislation.

PAIA provides that every person has the right to access information that is held by public and private bodies, where such access is necessary for the exercise or protection of any right. POPIA, in turn, regulates the processing of personal information and ensures that personal data is collected, used, stored, and destroyed in a lawful and responsible manner.

This Manual explains how **Hydrofroth (Pty) Ltd** ("**the Company**") manages access to records and personal information in compliance with these statutes. It also provides procedures for data subjects and requesters who wish to access records or exercise any of their rights as protected under PAIA and POPIA.

2. COMPANY OVERVIEW

Hydrofroth (Pty) Ltd is a South African company specialising in the manufacture and supply of mineral processing reagents. The Company operates across both local and international markets, providing integrated technical solutions and chemical products to support mineral beneficiation processes. The Company also operates a laboratory in Cape Town where research and development activities are undertaken to support client operations, improve product efficiency, and develop new technologies aimed at improving mineral recovery and processing outcomes.

3. CONTACT DETAILS

HYDROFROTH (PTY) LTD	
	: Suite 21, 3 rd Floor, Katherine & West, 114 West Street, Sandown, Sandton, 2906, Johannesburg, Gauteng, Republic of South Africa
	: P.O. Box 26265, Hout Bay, 7806, Western Cape, Republic of South Africa
	: +27 (0) 10 020 4947
	: paulw@hydrofroth.com
	: www.hydrofroth.com

4. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER

In terms of both PAIA and POPIA, the Company has appointed an Information Officer and a Deputy Information Officer to oversee compliance with the respective legislation and to manage requests for access to records or information.

	INFORMATION OFFICER	DEPUTY INFORMATION OFFICER
<u>Name:</u>	Chiraag Maharaj	Vicky Lagios
<u>Designation:</u>	Group Legal Counsel	Accountant
 :	chiraagm@axishouse.co.za	vickyl@hydrofroth.com
 :	+27 (0) 11 463 4888	+27 (0) 11 020 4947

Requests for access to information or the exercise of any rights under POPIA should be directed in writing to the Information Officer using the contact details provided above.

5. AVAILABILITY OF THE MANUAL

This Manual is available for inspection at the office of Hydrofroth (Pty) Ltd during ordinary business hours. A digital copy of this Manual is also available on the Company's website at <https://www.hydrofroth.com/>. Any member of the public may request a copy or inspect the Manual at no charge.

6. GUIDE TO PAIA AND POPIA

The Information Regulator of South Africa has compiled a guide to assist persons in exercising their rights under PAIA and POPIA. The guide outlines the procedures to follow when submitting a request for access to information and provides practical information for both requesters and responsible parties.

INFORMATION REGULATOR OF SOUTH AFRICA	
	: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191, Gauteng, Republic of South Africa
	: +27 (0) 800 017 160 / +27 (0) 10 023 5200
	: enquiries@infoeregulator.org.za
	: https://www.infoeregulator.org.za

7. CONFIDENTIALITY AND RIGHT OF ACCESS

Hydrofroth (Pty) Ltd is committed to protecting the confidentiality of all information in its possession, particularly information belonging to clients, employees, and third parties. Information will only be released where the requester complies with the relevant procedures and where such disclosure is not prohibited by law.

In terms of Section 50 of PAIA, any person may request access to a record held by a private body if the record is required for the exercise or protection of a right, provided the procedural requirements are met and no grounds for refusal apply.

8. PROCEDURE FOR ACCESSING INFORMATION

A request for access to records must be made in writing using the prescribed [Form 2](#), available from the Information Regulator or the Company. The request must include sufficient detail to enable the Information Officer to identify:

- the record(s) requested;
- the identity of the requester;
- the form of access requested; and
- the right that the requester is seeking to protect.

Upon receipt of the request, the Information Officer will assess the application and respond in writing within 30 days. If the request is approved, access will be granted subject to payment of any applicable fees. If the request is refused, the Information Officer will provide written reasons for the refusal and inform the requester of their right to lodge a complaint.

9. GROUNDS FOR REFUSAL OF ACCESS

The Company may refuse a request for access to records on one or more of the following grounds:

- the record contains personal information of a third party and disclosure would be unreasonable;
- the record contains commercial, financial, technical or trade secret information that may prejudice the Company;
- the record is subject to legal privilege;
- disclosure would prejudice the safety of individuals or the security of property; and/or

- disclosure would contravene an obligation of confidentiality owed to a third party.

Where a request is refused, the requester may lodge a complaint with the Information Regulator or approach a court of law for relief.

10. FEES FOR ACCESS

The requester may be required to pay a request fee as prescribed by PAIA regulations. If the request is granted, an access fee may be charged to cover the cost of reproduction, search, and preparation of the records. Access will only be granted once proof of payment has been received.

11. CATEGORIES OF RECORDS HELD BY THE COMPANY

11.1. Automatically Available Records

The following records are available without a formal request:

- Company brochures and product information;
- employment equity and training reports;
- general marketing material; and
- public Company policies.

11.2. Records Available on Request

The Company holds a range of records which are accessible upon request in accordance with the procedures set out above. These records are categorised as follows:

Corporate Governance	Company incorporation documents, resolutions, shareholder information, and minutes of board meetings.
Finance and Taxation	Annual financial statements, accounting records, tax returns, VAT documentation, and payroll records.

Human Resources	Employee contracts, disciplinary records, leave records, health and safety records, and training documentation.
Sales and Marketing	Client contracts, sales records, marketing strategies, and communications.
Legal and Compliance	Contracts, non-disclosure agreements, compliance reports, and internal policies.
Technical and Research	Laboratory data, technical analysis, R&D outputs, and product development information.

12. PROCESSING OF PERSONAL INFORMATION

Hydrofroth (Pty) Ltd processes personal information in accordance with the conditions for lawful processing as outlined in POPIA. The Company processes personal information for the following purposes:

- recruitment, employment, and employee administration;
- managing customer relationships and service delivery;
- processing payments and maintaining financial records;
- marketing, promotions, and customer engagement;
- procurement and supplier management; and
- legal compliance and dispute resolution.

Personal information is collected directly from data subjects or from authorised third parties and is retained only for as long as necessary for the purpose for which it was collected.

13. RECIPIENTS OF PERSONAL INFORMATION

The Company may share personal information with the following categories of third parties where necessary:

- employee benefit providers;
- financial institutions;
- professional advisors and consultants;

- regulatory authorities; and
- service providers under contractual agreement.

14. CROSS-BORDER DATA TRANSFERS

Hydrofroth (Pty) Ltd will not transfer personal information across South African borders unless the recipient country has laws in place that offer an adequate level of data protection, or where the data subject has provided explicit consent, or where the transfer is necessary to perform a contract.

15. SECURITY SAFEGUARDS

The Company employs a range of physical, administrative, and technical security measures to protect the confidentiality, integrity, and availability of personal information. These include:

- endpoint protection and antivirus software;
- SSL VPN and multi-factor authentication for remote access;
- data encryption on laptops and mobile devices;
- cloud backups and data loss prevention software; and
- user access controls and monitoring.

The Company continually reviews and updates its security practices to ensure compliance with evolving risks and technologies.

16. RIGHTS OF DATA SUBJECTS

Under POPIA, data subjects have the following rights:

- the right to be informed about the collection and use of their personal information;
- the right to request access to their personal data;
- the right to request correction or deletion of inaccurate, outdated, or unnecessary personal information;
- the right to object to processing of personal information; and
- the right to lodge a complaint with the Information Regulator.

Requests must be submitted in writing to the Information Officer using the prescribed forms available on the Regulator's website.

17. DIRECT MARKETING AND CONSENT

Hydrofroth (Pty) Ltd will only send electronic direct marketing communications where prior consent has been obtained or where an existing relationship justifies such communications. All direct marketing messages will contain an option for the recipient to opt out of future communications.

Consent is recorded, including the date, form, and the identity of the person who obtained it. Requests to withdraw consent or opt out of marketing can be submitted by email to the Information Officer.

18. UPDATES TO THIS MANUAL

This Manual is reviewed annually or as required to ensure compliance with changes to applicable legislation or operational practices. The current version was last updated in **August 2025**.