

DE BOD INC

PAIA MANUAL – PRIVATE BODY

Prepared in terms of section 51 of the
Promotion of Access to Information Act 2 of 2000
(as amended)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 **"DIO"** Deputy Information Officer
- 1.2 **"De Bod"** Liezl De Bod/De Bod Incorporated
- 1.3 **"IO"** Information Officer
- 1.4 **"MD"** Managing Director
- 1.5 **"Minister"** Minister of Justice and Correctional Services
- 1.6 **"PAIA"** Promotion of Access to Information Act No. 2 of 2000 (as Amended)
- 1.7 **"POPIA"** Protection of Personal Information Act No.4 of 2013
- 1.8 **"Regulator"** Information Regulator; and
- 1.9 **"Republic"** Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is beneficial for the public to-

- 2.1 review and confirm the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 2.2 obtain a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records, and the categories of records held on each subject.
- 2.3 know the description of the records of the body which are available in accordance with any other legislation.
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.7 know the description of the respective data subjects and of the information or categories of information relating thereto.
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied.
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OFFICERS

3.1. Information Officer

Name: Liezl De Bod

Designation - Managing Director

Tel: +27 (0) 84 295 4255

Email: liezl@debodlaw.co.za

3.2.1 Deputy Information Officer – Not appointed

3.2.2 Admin Officer – Mr JA Vorster

Email: info@vorofinregulatoryservices.co.za

3.3 Head Office

Physical Address:

35 Monte Vista Boulevard

Monte Vista

Western Cape

7460

Postal Address:

35 Monte Vista Boulevard

Monte Vista

Western Cape

7460

General contact details

Tel number: +27 (0) 84 295 4255

Email: liezl@debodlaw.co.za

Website: <https://www.debodlaw.co.za/>

4. GUIDE ON HOW TO USE PAIA, MAKE A PAIA REQUEST FOR RECORDS AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of:

4.3.1. the objects of PAIA and POPIA.

4.3.2. the postal and street address, phone number and electronic mail address of:

4.3.2.1. every Information Officer, and

4.3.2.2. every Deputy Information Officer, designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA².

4.3.3. the manner and form of a request for-

4.3.3.1. access to a record of a public body contemplated in section 11³; and

4.3.3.2. access to a record of a private body contemplated in section 50⁴.

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA.

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA.

4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.3.6.1. an internal appeal.

4.3.6.2. a complaint to the Regulator; and

4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.

4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.

4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively.

4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92¹¹.

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer.

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available in Afrikaans and English, for public inspection during normal office hours at the head office of De Bod Inc.

4.7 A request for access to records held by a public or private body must be made on the prescribed Form 2, which is available from the Information Regulator's website and must be submitted to the relevant Information Officer in accordance with the provisions of PAIA.

1 Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

2 Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

3 Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

4 Section 50(1) of PAIA- A requester must be given access to any record of a private body if

a) that record is required for the exercise or protection of any rights.

b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

5 Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

6 Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

7 Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

8 Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

9 Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

10 Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

11 Section 92(1) of PAIA provides that – “The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed;

(b) any matter relating to the fees contemplated in sections 22 and 54;

(c) any notice required by this Act;

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

5. CATEGORIES OF RECORDS OF DE BOD INC WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

This section of the Manual identifies the categories and sub-categories of records that De Bod Inc makes available to the public on a voluntary basis, without requiring a formal PAIA Form 2 (Request for Access to Record). These records consist of non-confidential, non-personal administrative or

operational documents and expressly exclude client sensitive information. Such documents may be accessed via the practice's website, automated email responses, or may be requested telephonically, by email, or in writing.

Practice and Company Information	Website / Automated email response	Direct Request to the Practice (telephonically, by email, or in writing.)
Practice profile or background	X	
Company registration		X
Contact details and practice locations	X	
Professional affiliations and memberships		X
Publicly Accessible Policies and Procedures		
Privacy Policy (aligned with POPIA)	X	
PAIA Manual (Section 51 Manual)	X	
Complaints procedure	X	
Billing or fee transparency information		X
Terms and Conditions for New and Existing Clients		X
Marketing and Informational Material		
Practice brochure where applicable		X
Services offered	X	X
Operating hours and appointment procedures	X	X
Statutory or Regulatory Disclosures		
Practice Registration/Accreditation and/or License/s		X

6. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Constitution of the Republic of South Africa, 1996	Constitutional rights records, equality and access-related records, governance records
Companies Act, 71 of 2008	Memorandum of Incorporation, share register, directors' and shareholders' resolutions
Companies Amendment Act, 16 of 2024	Corporate governance records, statutory amendment records, compliance records
Companies Second Amendment Act, 17 of 2024	Corporate governance records, statutory filings, compliance records
Promotion of Access to Information Act, 2 of 2000	PAIA Manual, access to information requests, PAIA compliance records
Protection of Personal Information Act, 4 of 2013	Privacy notices, processing records, data breach and consent records
Electronic Communications and Transactions Act, 25 of 2002	Electronic communications, electronic agreements, electronic record retention records
Cybercrimes Act, 19 of 2020	Information security policies, cyber incident records, cybersecurity response records
Basic Conditions of Employment Act, 75 of 1997	Employment contracts, leave records, working time records
Labour Relations Act, 66 of 1995	Disciplinary records, grievance records, employment dispute records
Employment Equity Act, 55 of 1998	Employment Equity Plan, employment equity reports, workforce demographic records
Occupational Health and Safety Act, 85 of 1993	Health and safety policies, incident records, risk assessments
Compensation for Occupational Injuries and Diseases Act, 130 of 1993	COIDA registration records, injury reports, compensation claim records
Income Tax Act, 58 of 1962	Income tax returns, PAYE records, tax supporting documentation

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Value-Added Tax Act, 89 of 1991	VAT returns, VAT invoices, VAT reconciliation records
Unemployment Insurance Act, 63 of 2001	UIF contribution records, employee declarations, UIF returns
Legal Practice Act, 28 of 2014	Fidelity Fund certificates, practising certificates, client mandate and trust account records
Legal Practice Council Rules	• trust accounting • record keeping • confidentiality • practice management • conveyancing obligations
Financial Intelligence Centre Act, 38 of 2001	Legal practitioners are Accountable Institutions. This governs: • client due diligence • record keeping • reporting obligations • RMCP • beneficial ownership sanctions screening
Deeds Registries Act, 47 of 1937	Core conveyancing legislation documents
Sectional Titles Act, 95 of 1986	Still relevant for older schemes and historical registrations.
Sectional Titles Schemes Management Act, 8 of 2011	Important for modern sectional title transfers.
Deeds Registries Regulations	Very relevant for conveyancing practice.
Alienation of Land Act, 68 of 1981	One of the most commonly used statutes in property transfers.
Administration of Estates Act, 66 of 1965	Required where transfers arise from deceased estates.

Matrimonial Property Act, 88 of 1984	Frequently encountered during transfers.
Trust Property Control Act, 57 of 1988	Trust Property Control management - Many purchasers and sellers transact through trusts.
Estate Agency Affairs legislation / Property Practitioners Act, 22 of 2019	conveyancing practice interacts with estate agents and property practitioners and a lot of exchange of client documents
Transfer Duty Act, 40 of 1949 & Regulations	Transactional documents
Municipal Systems Act, 32 of 2000	Municipal clearance certificates.
Local Government: Municipal Property Rates Act, 6 of 2004	Rates information and certificates
Administration of Estates Regulations	Transactional documents
Prescription Act, 68 of 1969	Evidenced documents
Superior Courts Act, 10 of 2013	General litigation records where applicable.
Electronic Deeds Registration Systems Act, 19 of 2019	Increasingly relevant as South Africa moves towards electronic deeds registration.

De Bod Inc has identified a range of legislation that may apply to its operations and under which it may hold corresponding categories of records. While every effort has been made to ensure the list is accurate and comprehensive, it may not be exhaustive. The Inc is currently in the process of consolidating and aligning the specific categories of documents and records held in terms of each applicable piece of legislation.

As new legislation is enacted or amendments to existing laws are introduced, this section will be updated accordingly. Requesters relying on access rights in terms of legislation not yet listed are encouraged to identify the relevant legal provision to enable the Information Officer to assess the request appropriately.

Access to any records remains subject to the applicable grounds for refusal as outlined in this PAIA Manual and relevant legislation.

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE PRACTICE HOLDS RECORDS AND THE CATEGORIES OF RECORDS HELD

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Subjects on which the body holds records	Categories of records
Corporate records	Company registration documents Memorandum of Incorporation Meeting minutes and board – and shareholder resolutions Records of appointment of Auditors and corporate officers Share certificates Share register Trust Deeds
Financial records	Accounting records Annual financial reports Asset register Auditors' reports Banking records and agreements Details of auditors Invoices issued and received Management accounts Other tax-related documents Records of payments to SARS Tax Levies Tax returns VAT
Human resources records, as applicable	List of employees Employment contracts Personnel files Disciplinary records Documents relating to employee benefits Compensation or redundancy payments Tax information of employees Salary records Leave records Training records Human resources Forms and procedures
Intellectual property records, as applicable	Records regarding trademarks, copyrights and design rights Records regarding registered domain names

Subjects on which the body holds records	Categories of records
	Intellectual property licence – and other agreements
Marketing records	Website enquiries Newsletter subscriptions Marketing communications Event registrations Client communication preferences Marketing consent records
Supplier records	Supplier list Agreements with suppliers Documentation and other information received from suppliers Supplier-related documentation and other information received from third parties Correspondence with suppliers Supplier-related correspondence with third parties
Insurance records	Insurance policies and Insurance claims records Insurance renewal documentation Correspondence with insurance providers, brokers and third parties
Legal and compliance records, as applicable	• Client engagement letters and mandates • Conveyancing files • Property transfer documentation • Bond registration and cancellation records • Deeds Office correspondence • Transfer duty records • Municipal and levy clearance certificates • FICA compliance records • Trust account records • Legal opinions and advice • Litigation records (where applicable) • PAIA and POPIA compliance records • Risk Management and Compliance Programme (RMCP) • Legal Practice Council correspondence • Fidelity Fund records
Information technology records	Information technology-related agreements of providers

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Subjects on which the body holds records	Categories of records
	Other documentation relating to computer systems and software IT Asset Register Disaster Recovery Plan Business Continuity Plan Cloud service agreements Cybersecurity records Audit logs Backup and disaster recovery records Access control records
Conveyancing and Property Records	• Sale Agreements • Powers of Attorney • Transfer documents • Mortgage bond documents • Cancellation documents • Rates clearance certificates • Levy clearance certificates • Sectional title documentation • Deeds Office lodgement records • Property reports • Title deeds • Estate transfer documentation • Trust property documentation
Financial Intelligence Centre Act (FICA) Records	• Client due diligence records • Beneficial ownership records • Risk assessments • Source of funds documentation • Source of wealth documentation • PEP screening • Sanctions screening • Ongoing due diligence records • RMCP records • Suspicious transaction reporting records (where applicable)

Subjects on which the body holds records	Categories of records
	This avoids burying one of the firm's most significant compliance record sets within "Legal and Compliance Records."
Corporate Social Responsibility (CSR), as applicable	CSR schedule of projects/record of organisations that receive funding Records and contracts of agreement with funded organisations CSR specific expenses
Website	Platform Profile Legal terms

8. PROCESSING OF PERSONAL INFORMATION

De Bod Inc processes personal information in accordance with its Privacy Notice, available on its website at, <https://www.debodlaw.co.za/> . The information below provides a high-level overview of the categories of personal information processed by the Practice and the purposes for which such information is collected, used, stored, disclosed, and retained.

The Privacy Notice includes:

- 8.1 the purpose of the processing of personal information.
- 8.2 a description of the categories of data subjects and the information or categories of information relating thereto and the manner of record keeping of the information.
- 8.3 the potential recipients or categories of recipients to whom personal information may be supplied.
- 8.4 the potential transborder flows of personal information; and
- 8.5 information regarding the security measures implemented to ensure the confidentiality, integrity, and availability of information to be processed.

8.1 Purpose of the Processing of Personal Information

De Bod Inc processes personal information for purposes reasonably necessary to provide legal and conveyancing services, to conduct its business operations, and to comply with applicable legal, regulatory and professional obligations. These purposes include, but are not limited to:

- Providing legal, conveyancing and notarial services, including receiving instructions, advising clients, preparing legal documentation, attending to property transfers, bond registrations and cancellations, and related legal matters.
- Establishing and maintaining client relationships, including client onboarding, communication, engagement management and the administration of legal mandates.
- Complying with legal, regulatory and professional obligations in terms of all applicable legislation, the Legal Practice Act, the Legal Practice Council Rules, the Financial Intelligence Centre Act (FICA), and other applicable laws.
- Conducting client due diligence, identity verification, beneficial ownership verification, risk assessments and ongoing monitoring as required by applicable anti-money laundering and counter-financing of terrorism legislation.
- Communicating with clients, estate agents, financial institutions, municipalities, the Deeds Office, government authorities and other authorised third parties as necessary to perform legal services and fulfil client mandates.
- Managing financial administration, including trust account administration, invoicing, payment processing, transfer duty administration, accounting, taxation and debt recovery where applicable.
- Maintaining accurate client, matter and transaction records, including legal documents, correspondence, conveyancing records and statutory records.
- Managing the firm's business operations, including human resources, supplier management, information technology, risk management, governance, quality assurance and regulatory compliance.
- Responding to lawful requests from regulatory authorities, courts, law enforcement agencies and other authorised persons where disclosure is required or permitted by law.
- Retaining, archiving and securely disposing of records in accordance with applicable legislation, professional standards and prescribed record retention periods.

All personal information is processed in a manner that ensures its confidentiality, integrity, and availability, in accordance with applicable data protection legislation and ethical duties of legal privilege and confidentiality.

8.2 Categories of Data Subjects

Category of Data Subject	Types of Personal Information Held
Clients	Identification and contact details, identity and verification information, marital status (where relevant), financial information, property ownership information, instructions, correspondence, FICA documentation, and transaction-related records.
Prospective Clients	Identification and contact details, enquiry details, correspondence, and information necessary to assess or provide legal services.
Employees	Personal identification details, contact information, employment records, payroll information, qualifications, leave records, tax information, performance and training records.
Directors and Shareholders	Identification and contact details, statutory appointment records, shareholding information, declarations, and governance-related records.
Beneficial Owners, Trustees and Authorised Representatives	Identification and verification information, authority documentation, beneficial ownership information, trust or company-related records, and FICA documentation.
Service Providers and Professional Advisors	Contact details, contractual information, banking details, invoices, correspondence, due diligence records, and performance-related information.
Estate Agents, Financial Institutions and Other Transaction Parties	Contact details, transaction-related information, correspondence, agreements, and documentation required to facilitate legal and conveyancing transactions.
Third Parties to Legal Matters	Identification, contact details, property and transaction information, correspondence, and documents relevant to legal or conveyancing matters.
Regulatory Authorities and Government Departments	Contact details, statutory correspondence, licences, registrations, filings, compliance records, and regulatory communications.

8.3 The recipients or categories of recipients to whom the personal information may be supplied and the purposes of disclosure

Category of Recipients	Purpose of Disclosure
Clients	Provision of legal advice, updates on matters, reporting, invoicing, and responding to requests for information.
Deeds Registries	Registration of property transfers, mortgage bonds, bond cancellations, and other deeds registry transactions.
Financial Institutions	Processing of mortgage bond registrations and cancellations, payment instructions, trust account transactions, and related conveyancing matters.
Municipalities, SARS and Other Government Authorities	Compliance with statutory obligations, obtaining clearance certificates, payment of transfer duty, and other legal or regulatory requirements.
Estate Agents and Property Practitioners	Facilitating property transactions, communicating transaction progress, and coordinating matters relating to transfers, where authorised.
Correspondent Attorneys, Counsel and Other Legal Professionals	Obtaining legal opinions, litigation support, specialised legal services, or assisting with legal and conveyancing matters.
Service Providers	Provision of information technology, cloud storage, legal software, document management, accounting, auditing, banking, and other business support services, subject to appropriate confidentiality obligations.
Regulatory and Professional Bodies	Compliance with legal, regulatory and professional obligations, including reporting and responding to lawful requests.
Courts, Tribunals and Law Enforcement Authorities	Compliance with court orders, legal proceedings, investigations, or other lawful requests.
Other Third Parties	Where disclosure is authorised by the client, required to fulfil the legal mandate, or permitted or required by applicable law.

8.4 Planned transborder flows of personal information

Transborder Flows of Personal Information

De Bod Inc confirms that certain personal information may be stored, processed or backed up on secure cloud-based platforms where data may be hosted outside the borders of the Republic of South Africa.

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Where personal information is transferred outside South Africa, De Bod Inc will ensure that such transfers are conducted in accordance with section 72 of the Protection of Personal Information Act, 4 of 2013 ("POPIA"), and only where an adequate level of protection is afforded to the personal information or where appropriate contractual or other lawful safeguards have been implemented. De Bod Inc may utilise reputable third-party cloud service providers, information technology providers and practice management systems that maintain appropriate technical and organisational security measures, including encryption, access controls, authentication mechanisms, secure data transmission and confidentiality obligations, to protect personal information against unauthorised access, loss, misuse or disclosure.

Personal information processed by De Bod Inc, including client information, conveyancing records, legal documentation, FICA records, financial records and other business records, may be stored electronically on secure systems hosted within or outside South Africa, subject to appropriate contractual, technical and organisational safeguards.

De Bod Inc remains committed to protecting the confidentiality of personal information and legal professional privilege and will take all reasonable steps to ensure that any cross-border processing of personal information complies with POPIA and other applicable legal and professional obligations.

8.5 Information Security Measures

De Bod Inc is committed to protecting the confidentiality, integrity and availability of all personal information processed in the course of providing legal, conveyancing and related professional services. Given the confidential nature of client information and legal documentation, the practice implements appropriate technical, administrative and physical safeguards to protect personal information against loss, unauthorised access, disclosure, alteration or destruction.

These security measures are implemented in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"), the Legal Practice Act, 28 of 2014, the Rules of the Legal Practice Council, and other applicable legal and professional obligations.

Security Measures Implemented

The following measures are in place, or implemented where appropriate, to safeguard personal information:

1. Access Control and Authentication

- Password-protected user accounts and devices.
- Role-based access to information on a strict "need-to-know" basis.

- Appropriate user authentication and access management controls.

2. Data Protection and Encryption

- Secure electronic communication channels, including encrypted email where appropriate.
- Encryption of personal information stored on supported systems and cloud platforms, where applicable.

3. Secure Storage

- Secure storage of physical records in controlled-access environments.
- Electronic records maintained on secure practice management systems and reputable cloud-based platforms with appropriate security controls.

4. Endpoint and Network Security

- Up-to-date antivirus and anti-malware protection.
- Firewalls, system security controls and regular security updates where applicable.

5. Backup and Business Continuity

- Regular backups of client, conveyancing and business records.
- Secure backup storage and data recovery procedures to support business continuity.

6. Monitoring and Information Governance

- Audit logs and system monitoring where appropriate.
- Periodic review of information security controls and access permissions.

7. Personnel Confidentiality and Awareness

- Confidentiality obligations applicable to employees, consultants and service providers.
- Ongoing awareness of information security, confidentiality and POPIA responsibilities.

8. Secure Retention and Disposal

- Secure retention of records in accordance with applicable legal and professional retention requirements.
- Secure destruction of paper and electronic records when they are no longer required or when lawful retention periods have expired.

De Bod Inc continually reviews and updates its information security measures to address evolving technology, cybersecurity risks, legal developments and professional obligations, thereby ensuring the continued protection of personal information and the preservation of client confidentiality and legal professional privilege.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on <https://www.debodlaw.co.za/> ;

9.1.2 at the office of De Bod Inc, for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

This Manual shall be reviewed and updated by the Information Officer or a duly authorised representative of De Bod Inc on a periodic basis, as required to reflect legislative, regulatory, operational, or organisational changes, and in any event at least annually.

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Signature - L De Bod
 - Information Officer and Managing Director