



PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

THIS MANUAL WAS PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (“The Act”) (AS AMENDED FROM TIME TO TIME) AND TO ADDRESS REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (“POPI”) (AS AMENDED FROM TIME TO TIME)

This manual applies to the British American Tobacco group of companies registered in the Republic of South Africa (each of which shall be regarded and deemed to have separately complied with and to be separately liable and responsible for the obligations and provisions contained herein), having their registered offices at Waterway House South, No 3 Dock Road, Waterfront, Cape Town, South Africa, 8001 (“**BAT South Africa Group**”), which includes:

Company	Registration No	Status
Agrega Eemea (Pty) Ltd	2008/003790/07	Dormant (to be liquidated)
Amalgamated Tobacco Corporation (South Africa) (Pty) Ltd	1958/001487/07	Dormant (Trademark)
American Cigarette Company (Overseas) (Pty) Ltd	1958/003266/07	Dormant (Trademark)
Benson and Hedges (Pty) Ltd	1948/029717/07	Dormant (Trademark)
British American Shared Services Africa Middle East (Pty) Ltd	1995/010311/07	Dormant (to be liquidated)
British American Tobacco East and Southern Africa (Pty) Ltd	1955/001468/07	Active
British American Tobacco GSD (South Africa) (Pty) Ltd	1999/013751/07	Dormant (to be liquidated)
British American Tobacco Holdings South Africa (Pty) Ltd	1995/006947/07	Active (Holding Company)
British American Tobacco Properties South Africa (Pty) Ltd	1995/011898/07	Active (to be liquidated)
British American Tobacco Services South Africa (Pty) Ltd	1958/000324/07	Dormant (Holding company) (Investment holding)



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		company of Trademark entities)
British American Tobacco South Africa (Pty) Ltd	1995/009509/07	Active
Brown And Williamson Tobacco Corporation (Pty) Ltd	1955/002236/07	Dormant (Trademark)
Business Venture Investments No 216 (Pty) Ltd	1999/013698/07	Dormant (Trademark)
Carlton Cigarette Company (Pty) Ltd	1957/000380/07	Dormant (Trademark)
John Chapman (Pty) Ltd	1939/012696/07	Active (Trademark- entity receives royalty income)
John Player And Sons (Pty) Ltd	1972/009374/07	Dormant (Trademark)
Kentucky Tobacco Corporation (Pty) Ltd	1938/011881/07	Dormant (Trademark)
Martins Of London (Pty) Ltd	1950/035853/07	Dormant (Trademark)
Rembrandt Tobacco Corporation (Overseas) (Pty) Ltd	1945/019072/07	Dormant (Trademark)
Riggio Tobacco Corporation Of New York (Pty) Ltd	1956/002862/07	Dormant (Trademark)
Rothmans Of Pall Mall London (Pty) Ltd	1950/035854/07	Dormant (Trademark)
St Regis Tobacco Corporation (Pty) Ltd	1963/001651/07	Dormant (Trademark)
Thomas Bear's Son And Company (Pty) Ltd	1902/000453/07	Dormant (Trademark)
Tobacco Research And Development Institute (Pty) Ltd	1965/008155/07	Dormant (Trademark)
Twisp (Pty) Ltd	2014/273628/07	Active
W D And H O Wills (Pty) Ltd	1955/001087/07	Dormant (Trademark)
Westminster Tobacco Company (Pty) Ltd	1914/001404/07	Dormant (Trademark)
Winfield Tobacco Corporation (Pty) Ltd	1959/003946/07	Dormant (Trademark)
Winston Tobacco Company (Pty) Ltd	1971/001874/07	Dormant (Trademark)

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Document Management

Date	Version	Description	Author
November 2020	1.0	First Release	Penelope Moilwa
July 2021	1.1	Second Release	Penelope Moilwa
March 2022	1.2	Third Release	Penelope Moilwa

1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|--------------------|--|
| 1.1 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.2 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.3 | “Regulator” | Information Regulator; and |
| 1.4 | “Republic” | Republic of South Africa |

2. INTRODUCTION

2.1 Nature Of Business

The BAT South Africa Group are predominantly business of manufacturing and selling cigarettes, tobacco and other nicotine products.

2.2 PAIA

- 2.2.1 PAIA gives effect to the Constitutional right of access to information held by the State or any other or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights.
- 2.2.2 Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such private body and stipulates the minimum requirements that the manual has to comply with.

3. PURPOSE OF PAIA MANUAL

3.1 This PAIA Manual is useful for the public to-

- 3.1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.1.2 have 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;
- 3.1.3 know the description of the records of the body which are available in accordance with any other legislation;
- 3.1.4 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;
- 3.1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.1.6 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;



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- 3.1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.1.9 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; and
- 3.1.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE BAT SOUTH AFRICA GROUP

CEO : Mr. Andre Joubert
Deputy Information Officer : Mr Franz Hirschberg

Deputy Information Officer : Ms Lynn Visagie

Physical Address : Waterway House South
No3 Dock Road
Waterfront,Cape Town
Western Cape
8002

Postal Address : PO Box 631
Cape Town
Western Cape
8000

Telephone : +27 21 003 6500

Email : ESADataPrivacy@bat.com

Website : <http://www.batsa.co.za>

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1 The Regulator has, in terms of section 10(1) of PAIA 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.
- 5.2 The Guide is available in each of the official languages and in braille.
- 5.3 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.
- 5.4 The Guide can also be obtained-
 - 5.4.1 upon request to the Information Officer (see details listed above);
 - 5.4.2 from the Regulator, whose details are listed below:



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Postal Address:

JD House
27 Siemens Street
Braamfontein, Johannesburg, 2001

E-mail Address:

infoereg@justice.gov.za

Website:

<https://www.justice.gov.za/infoereg/>

5.5 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours and on our website – www.batsa.com

5.5.1 English

5.5.2 Sotho

5.5.3 Zulu

6. CATEGORIES OF RECORDS OF THE BAT SOUTH AFRICA GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

General information about the BAT South Africa Group which is automatically available and does not need to be requested can be accessed via the internet on our website at (www.batsa.com) and social media pages.

7. DESCRIPTION OF THE RECORDS OF BAT SOUTH AFRICA GROUP WHICH ARE AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

7.1 Records of the BAT South Africa Group may be kept by or on behalf of the BAT South Africa Group in accordance with the following legislation (some of which legislation may not be applicable to all companies within the BAT South Africa Group) and which list is not necessarily exhaustive:

- Basic Conditions of Employment Act 57 of 1997
- Broad-based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Copyright Act 98 of 1978
- Currencies and Exchanges Act 9 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Financial Services Board Act 97 of 1990
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- Prevention of Organised Crime Act 121 of 1998
- Prevention and Combating of Corrupt Activities Act 12 of 2004
- Promotion of Access to Information Act 2 of 2000
- Protected Disclosures Act 26 of 2000
- Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004



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- Skills Development Act 97 of 1998
- Skills Development Levy Act 9 of 1999
- Securities Transfer Tax Act 25 of 2007
- Securities Transfer Tax Administration Act 26 of 2007
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act 30 of 1966
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

8. SUBJECT CATEGORIES OF RECORDS HELD BY EACH BAT SOUTH AFRICA GROUP COMPANY

Company	Category of Record
Agrega Eemea (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
Amalgamated Tobacco Corporation (South Africa) (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
American Cigarette Company (Overseas) (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation

	<ul style="list-style-type: none"> Records relating to the appointment of directors / auditor / secretary / public officer and other officers Share Register and other statutory registers Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> Annual Financial Statements Tax Returns Accounting Records Banking Records Asset Register
Benson and Hedges (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> Incorporation documents Memorandum of Incorporation Records relating to the appointment of directors / auditor / secretary / public officer and other officers Share Register and other statutory registers Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> Annual Financial Statements Tax Returns Accounting Records Banking Records Asset Register
British American Shared Services Africa Middle East (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> Incorporation documents Memorandum of Incorporation Records relating to the appointment of directors / auditor / secretary / public officer and other officers Share Register and other statutory registers Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> Annual Financial Statements Tax Returns Accounting Records Banking Records Asset Register
British American Tobacco East and Southern Africa (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> Documents of incorporation Memorandum of Incorporation Minutes of Board of Directors meetings

- Records relating to the appointment of directors / auditor / secretary / public officer and other officers
- Share Register and other statutory registers
- Committee meeting records

Financial & Tax Records

- Annual Financial Statements
- Tax Returns
- Accounting Records
- Banking Records
- Bank Statements
- Electronic banking records
- Asset Register
- Purchase Orders / Invoices
- PAYE Records
- Documents issued to employees for income tax purposes
- Records of payments made to SARS on behalf of employees
- All other statutory compliances:
 - VAT
 - Skills Development Levies
 - UIF
- Workmen's Compensation

Personnel Documents and Records

- Employment contracts
- Employment Equity Plan
- Disciplinary records
- Salary records
- Disciplinary and grievance records
- Leave records
- Training records
- Training Manuals and registers

Operational:

- Operational reviews
- Vendor records
- Guidelines, policies and procedures
- Contracts
- Customer records and reports
- Internal and external correspondence
- Records provided by a third party
- Insurance records

	<ul style="list-style-type: none"> • Marketing campaigns • Communications
<p>British American Tobacco GSD (South Africa) (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
<p>British American Tobacco Holdings South Africa (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Documents of incorporation • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Share certificates <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
<p>British American Tobacco Properties South Africa (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions • Lease Agreement <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns

	<ul style="list-style-type: none"> • Accounting Records • Banking Records • Asset Register
<p>British American Tobacco Services South Africa (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
<p>British American Tobacco South Africa (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Documents of incorporation • Memorandum of Incorporation • Minutes of Board of Directors meetings • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Committee meeting records <p>Financial Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Accounting Records • Banking Records • Bank Statements • Electronic banking records • Asset Register • Purchase Orders / Invoices <p>Personnel Documents and Records</p> <ul style="list-style-type: none"> • Employment contracts • Employment Equity Plan • Disciplinary records • Salary records • Disciplinary and grievance records • Leave records • Training records • Training Manuals and registers

	<p>Operational:</p> <ul style="list-style-type: none"> • Operational reviews • Vendor records • Guidelines, policies and procedures • Contracts • Customer records and reports • Internal and external correspondence • Records provided by a third party • Insurance records • Marketing campaigns • Communications
<p>Brown And Williamson Tobacco Corporation (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
<p>Business Venture Investments No 216 (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
<p>Carlton Cigarette Company (Pty) Ltd</p>	<p>Company Records</p>

	<ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
John Chapman (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
John Player And Sons (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
Kentucky Tobacco Corporation (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents

	<ul style="list-style-type: none"> • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
Martins Of London (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
Rembrandt Tobacco Corporation (Overseas) (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
Riggio Tobacco Corporation Of New York (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation

	<ul style="list-style-type: none"> • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
Rothmans Of Pall Mall London (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
St Regis Tobacco Corporation (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records Asset Register
Thomas Bear's Son And Company (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors /

	<p>auditor / secretary / public officer and other officers</p> <ul style="list-style-type: none"> • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
<p>Tobacco Research And Development Institute (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
<p>Twisp (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Documents of incorporation • Memorandum of Incorporation • Minutes of Board of Directors meetings • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Committee meeting records <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Bank Statements • Electronic banking records • Asset Register • Purchase Orders / Invoices • PAYE Records

	<ul style="list-style-type: none"> • Documents issued to employees for income tax purposes • Records of payments made to SARS on behalf of employees • All other statutory compliances: <ul style="list-style-type: none"> ○ VAT ○ Skills Development Levies ○ UIF <p>Workmen’s Compensation</p> <p>Personnel Documents and Records</p> <ul style="list-style-type: none"> • Employment contracts • Employment Equity Plan • Disciplinary records • Salary records • Disciplinary and grievance records • Leave records • Training records • Training Manuals and registers <p>Operational:</p> <ul style="list-style-type: none"> • Operational reviews • Vendor records • Guidelines, policies and procedures • Contracts • Customer records and reports • Internal and external correspondence • Records provided by a third party • Insurance records • Marketing campaigns • Communications
<p>W D And H O Wills (Pty) Ltd</p>	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns

	<ul style="list-style-type: none"> • Accounting Records • Banking Records • Asset Register
Westminster Tobacco Company (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
Winfield Tobacco Corporation (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records • Banking Records • Asset Register
Winston Tobacco Company (Pty) Ltd	<p>Company Records</p> <ul style="list-style-type: none"> • Incorporation documents • Memorandum of Incorporation • Records relating to the appointment of directors / auditor / secretary / public officer and other officers • Share Register and other statutory registers • Minutes & Resolutions <p>Financial & Tax Records</p> <ul style="list-style-type: none"> • Annual Financial Statements • Tax Returns • Accounting Records

	<ul style="list-style-type: none">• Banking Records• Asset Register
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9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

9.1.1 For detailed information regarding our processing activities and privacy practices, including the categories of data subjects, type of personal information, purposes for processing personal information, categories of recipients of processing, actual or planned transborder flows, please see our privacy notices:

9.1.1.1 Third Parties: Please see [Privacy Notice](#) on our website (www.batsa.com); and

9.1.1.2 Employees & Contractors: Please see Employee Privacy Notice on our shared drive.

9.1.2 Which are also available on request from: ESADataPrivacy@bat.com.

10. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES

10.1 The BAT South Africa Group employs up to date technology to ensure the confidentiality, integrity and availability of the personal information under its care.

10.2 We employ up to date technology to ensure the confidentiality, integrity and availability of the personal information under our care Measures include, but are not limited to:

10.2.1 Firewalls

10.2.2 Virus protection software and update protocols

10.2.3 Encryption

10.2.4 Electronic and physical access control

10.2.5 Secure setup of hardware and software making up the IT infrastructure

10.2.6 Outsourced service providers who process personal information on behalf of the BAT South Africa Group are contracted to implement security controls

10.2.7 Ongoing security awareness training of employees and contractors

11. FORM OF REQUEST

11.1 A requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.

11.2 A request for access to records held by a BAT South Africa Group company in terms of section 50 of PAIA must be made on the form contained in the Regulations regarding the Promotion of Access to Information ([Form 2](#)), as amended from time to time, (a copy of which is attached as **Appendix 1** only for reference). The request must be made to the BAT South Africa Group company at the address or email address, specified in section 4 above.

11.3 A requester must provide sufficient detail on the prescribed form to allow the BAT South Africa Group company to identify the record or records which have been requested and the identity of the requester. If a request is made on behalf of another person or entity, the requester must submit details and proof of the capacity in which the requester is making the request, which must be reasonably satisfactory to the BAT South Africa Group company. The requester is also required to indicate the form of access to the relevant records that is required, and to provide his, her or its contact details in the Republic of South Africa.

12. AVAILABILITY OF THE MANUAL

- 12.1 A copy of the Manual is available-
 - 12.1.1 on our website at www.batsa.com, and/or
 - 12.1.2 head office set out in clause 4 above for public inspection during normal business hours;
 - 12.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 12.1.4 to the Information Regulator upon request.
- 12.2 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.

14 UPDATING OF THE MANUAL

The Information Officer of the BAT South Africa Group company will on a regular basis update this manual.

ISSUED BY AND ON BEHALF OF THE BAT SOUTH AFRICA GROUP ON MARCH 2021



09:31:02(UTC+02:00)

SIGNIFLOW.COM

Information Officer

Andre Joubert

Appendix 1: Prescribed Form 2 To Be Completed By A Requester

FORM 2:

**REQUEST FOR ACCESS TO RECORD
[Regulation 7]**

Note:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The information officer

(Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION

Full names:	
Identity number:	
Capacity in which request is made (when made on behalf of another person):	
Postal Address:	
Street Address:	
E-mail Address	
Contact numbers:	
Tel. (B):	
Cellular:	
Facsimile	



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Full names of person on whose behalf request is made (if applicable):	
Identity number:	
Postal Address:	
Street Address:	
E-mail Address:	
Contact numbers:	
Tel. (B):	
Cellular:	
Facsimile:	

PARTICULARS OF RECORD REQUESTED	
Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)	
Description of record or relevant part of the record:	
Reference number, if available:	
Any further particulars of record:	

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

MANNER OF ACCESS	
<i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	



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Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected:	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEEES	
a)	A request fee must be paid before the request will be considered.
b)	You will be notified of the amount of the access fee to be paid.
c)	The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
d)	If you qualify for exemption of the payment of any fee, please state the reason for exemption.
Reason:	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ on this _____ day of _____
20_____

Signature of requester / person on whose behalf request is made

.....
.....

FOR OFFICIAL USE

Reference number:	
Request received by: <i>(state rank, name and surname of information officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of information officer