

**BOTLE BUHLE
BRANDS**

Bottle Buhle Brands (Pty) Ltd
Company reg: 1996/013551/07

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BOTLE BUHLE BRANDS (PROPRIETARY) LIMITED

(REGISTRATION NUMBER 1996/013551/07)

MANUAL

**PUBLISHED IN TERMS OF SECTION 51 OF THE
PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000**



CONTENTS:

INTRODUCTION.....3

AVAILABILITY OF THIS PAIA MANUAL.....3

AVAILABILITY OF GUIDES TO THE PAIA AND POPI ACTS.....3

COMPANY CONTACT DETAILS.....4

PROCESSING OF PERSONAL INFORMATION4

THE PURPOSES OF PROCESSING PERSONAL INFORMATION BY BBB5

SHARING OF PERSONAL INFORMATION5

COMPANY RECORDS6

RECORDS WHICH MAY BE KEPT IN ACCORDANCE WITH OTHER LEGISLATION7

SECURITY MEASURES TO PROTECT PERSONAL INFORMATION.....7

REQUESTS AND FEES.....8



INTRODUCTION

Botle Buhle Brands (Proprietary) Limited (“BBB” or the “Company”) imports, sells, distributes and markets a range of products in the following brands: Botle Buhle Home, Puer Beauty, Oriijins Health and Wellness and Puer Fashion, for onward sale to distributors of such products utilising the direct selling model.

This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and the personal information BBB holds, and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA Act”). In addition, it explains how to access, or object to, personal information held by the Company, or to request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPI Act”).

The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest. Requests shall be made in accordance with the prescribed procedures.

AVAILABILITY OF THIS PAIA MANUAL

This manual is published on the Company website at www.bbb.co.za or alternatively, a copy can be requested from the BBB Information Officer.

AVAILABILITY OF GUIDES TO THE PAIA AND POPI ACTS

Policies, Guidance Notes and Notices to the POPI and PAIA Acts can be obtained from the website of The Information Regulator (South Africa) at www.justice.gov.za/inforeg.

COMPANY CONTACT DETAILS

Botle Buhle Brands (Proprietary) Limited

Registration Number: 1996/013551/07

Physical Address: 208 Boundary Park
Corner Epsom Avenue and Malibongwe Drive
Northriding
Johannesburg
2162
P.O. Box 296, Randpark Ridge, 2156

Telephone number: 010 442 0222 (Support Office)

Email: info@bbb.co.za

Website: www.bbb.co.za

Directors: Sydney Ontong
Anne Lambropoulos

Information Officer: Levi Suttner

Information Officer Email: informationofficer@bbb.co.za

PROCESSING OF PERSONAL INFORMATION

BBB will only process personal information in accordance with the South African privacy laws. Our approach regarding processing of information is further detailed in our Privacy Policy which can be found at www.bbb.co.za or requested from the Information Officer.

THE PURPOSES OF PROCESSING PERSONAL INFORMATION BY BBB

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact BBB;
- to maintain our system records;
- for recruitment purposes;
- for employment purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- to monitor access, secure and manage our premises and facilities;
- to transact with our suppliers, distributors, managers and consultants;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;
- to help us recover debts due to the Company or its distributors and managers;
- to carry out analysis and customer profiling; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

SHARING OF PERSONAL INFORMATION

BBB may share personal information:

- With entities to whom it is reasonably necessary or desirable for BBB to disclose personal information;
- With BBB distributors, managers, and consultants, to allow for communication regarding product advice, ordering advice, product information or joining the BBB sales force;
- With government authorities or other third parties, if required by law or reasonably necessary to protect the rights, property and safety of others or BBB;
- With employees of BBB who require it to perform their jobs;
- For marketing purposes, disclose or transfer personal information to marketing service providers; and
- As may be necessary to disclose or transfer personal information to suppliers, affiliates, partners or agents in order to provide our products services.

COMPANY RECORDS

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided.

Information published on our website is accessible to the public and is subject to our Privacy Policy and Terms and Conditions. Such information includes but is not limited to our monthly catalogue and business contact details.

The following records are kept by BBB within the various departments. Requests to access the information shall be done in accordance with PAIA and this Manual:

DEPARTMENT	SUBJECT
Health, Safety and Environmental	<ul style="list-style-type: none"> • Health and Safety Records and Policies
Finance	<ul style="list-style-type: none"> • Financial Statements • Tax Records • Insurance Information
Human Resources	<ul style="list-style-type: none"> • Employee Information • Employment Contracts • Payroll Records • Recruitment Records • Supplier Information • Distributor Information • Manager Information • Consultant Information
Legal	<ul style="list-style-type: none"> • Contract and Agreement Documentation • Company Guidelines, Policies and Procedures • Intellectual Property Records
Sales and Marketing	<ul style="list-style-type: none"> • Market Information • Product Brochures • Sales Force Data
Operations/Logistics	<ul style="list-style-type: none"> • Production Records
Facilities Management	<ul style="list-style-type: none"> • Physical Security Records • Electronic Access Information

RECORDS WHICH MAY BE KEPT IN ACCORDANCE WITH OTHER LEGISLATION:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 61 of 1973
- Competition Act 89 of 1998
- Constitution of South Africa Act 108 of 1996
- Consumer Protection Act 68 of 2008
- Copyright Act 98 of 1987
- Debt Collectors Act 114 of 1998
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act 38 of 2001
- Income Tax Act 58 of 1962
- Intellectual Property Laws Amendments Act 38 of 1997
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

Reasonable, technical and organisational measures have been implemented for the protection of personal information processed by BBB and its operators. In terms of the POPI Act, operators are third parties that process personal information on behalf of BBB. We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction. We do our best to ensure that operators that process personal information on behalf of BBB apply adequate safeguards as outlined above.

Amongst others, some security measures implemented are the following:

- System security software
- System anti-virus software
- Email protection (encryption methods)
- System backups
- Access to system by means of level of employee
- Re-occurring risk assessments
- Physical information kept under lock and key with limited access

REQUESTS AND FEES

To facilitate the processing of your request:

- Use the prescribed form, available on the website of the Information Regulator at www.justice.gov.za/inforeg/docs or South African Human Rights Commission at www.sahrc.org.za
- Address your request to the Information Officer.
- Provide sufficient details to enable the Company to identify:
 - The record(s) requested;
 - The requester (and if an agent is lodging the request, proof of capacity);
 - The form of access required;
 - The postal address or fax number of the requester in the Republic;
 - If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
 - The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

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

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

The fee structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za.

The Company does not have internal appeal procedures regarding PAIA and POPI Act requests. As such, the decision made by the duly authorised persons is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator, for relief.