

PAIA MANUAL

Marius Nel Jewellers

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 (PAIA)
Incorporating the requirements of the Protection of Personal Information Act, 4 of 2013 (POPIA)



**MARIUS NEL
JEWELLERS**



Marius Nel
(Owner)

30 June 2026
Date

MARIUS NEL JEWELLERS

Manufacture • Custom Design • Jewellery Repairs • Retail of Fine Jewellery

Shop 209A
Randridge Mall
Corner of John Vorster Drive & Kayburn Avenue
Randpark Ridge
Randburg
2196

Telephone: 063 049 5816

Email: admin@mariusnel.co.za

Website: www.mariusnel.co.za

Information Officer: Marius Nel

Owner / Sole Proprietor

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CONFIDENTIALITY NOTICE

This manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), as amended by the Protection of Personal Information Act, 4 of 2013 ("POPIA").

The purpose of this manual is to facilitate requests for access to records held by Marius Nel Jewellers while ensuring the protection of personal information entrusted to the business by customers, employees, suppliers, contractors and other stakeholders.

Nothing contained in this manual authorises disclosure of information where disclosure is prohibited by law or would infringe upon the privacy rights of another person.

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1. INTRODUCTION

The Promotion of Access to Information Act, 2 of 2000 ("PAIA") gives effect to the constitutional right of access to information held by public and private bodies where such information is required for the exercise or protection of any rights.

As a private body, Marius Nel Jewellers is required to make certain information available through this manual and to establish procedures through which members of the public may request access to records held by the business.

This manual has also been prepared with due consideration of the Protection of Personal Information Act, 4 of 2013 ("POPIA"), ensuring that access to information is balanced against the privacy rights of individuals whose personal information is processed by the business.

2. PURPOSE OF THIS MANUAL

The objectives of this manual are to:

- describe the structure and activities of Marius Nel Jewellers;
- identify the categories of records maintained by the business;
- explain how requests for information may be submitted;
- provide contact details for the Information Officer;
- describe the manner in which personal information is processed;
- demonstrate compliance with PAIA and POPIA;
- promote transparency and accountability; and
- assist customers, suppliers, employees and members of the public in exercising their rights under applicable legislation.

3. DEFINITIONS

For purposes of this manual:

"Business" means Marius Nel Jewellers.

"Information Officer" means the owner of the business appointed in terms of PAIA and POPIA.

"Personal Information" has the meaning assigned to it under POPIA and includes any information relating to an identifiable natural or juristic person.

"Processing" includes the collection, storage, recording, organisation, updating, retrieval, dissemination, destruction or deletion of personal information.

"Requester" means any person requesting access to records held by the business in accordance with PAIA.

"Record" means any recorded information regardless of form or medium.

4. BUSINESS PARTICULARS

Registered Trading Name:

Marius Nel Jewellers

Business Type:

Sole Proprietorship

Nature of Business:

- Manufacture of fine jewellery
- Custom jewellery design
- Jewellery repairs
- Diamond sales
- Coloured gemstone sales
- Precious metal jewellery
- Insurance valuations
- Jewellery remodelling

Physical Address:

Shop 209A, Randridge Mall, Corner John Vorster Drive & Kayburn Avenue

Randpark Ridge, Randburg

2196

Telephone:

063 049 5816

General Email:

admin@mariusnel.co.za

Information Officer Email:

info@mariusnel.co.za

Website:

www.mariusnel.co.za

Business Hours:

Monday to Friday

09:00 – 17:00

Saturday

09:00 – 15:00

Sunday & Public Holidays

Closed

5. INFORMATION OFFICER

5.1 Appointment

In accordance with Section 56 of the Protection of Personal Information Act, 4 of 2013 (POPIA), read together with the Promotion of Access to Information Act, 2 of 2000 (PAIA), the owner of Marius Nel Jewellers serves as the Information Officer.

As a sole proprietorship, no Deputy Information Officer has been appointed.

Information Officer

Name: Marius Nel

Position: Owner / Information Officer

Telephone: 063 049 5816

Email: info@mariusnel.co.za

Responsibilities of the Information Officer

The Information Officer is responsible for:

- Promoting compliance with PAIA and POPIA.
- Receiving and responding to requests for access to information.
- Ensuring the lawful processing of personal information.
- Developing and maintaining privacy policies.
- Managing security safeguards.
- Handling complaints relating to privacy.
- Reporting data breaches where required.
- Ensuring staff awareness of confidentiality obligations.
- Maintaining this PAIA Manual.
- Reviewing compliance on an annual basis.

6. INFORMATION REGULATOR

The Information Regulator is responsible for monitoring and enforcing compliance with PAIA and POPIA.

Members of the public who require further information regarding their rights may contact the Information Regulator directly.

Website:

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

Email:

PAIACompliance@inforegulator.org.za

General Enquiries:

enquiries@info regulator.org.za

Complaints:

PAIAComplaints@info regulator.org.za

Postal Address:

JD House

27 Stiemens Street

Braamfontein

Johannesburg

2001

7. LEGISLATION APPLICABLE TO THE BUSINESS

The following legislation governs records maintained by Marius Nel Jewellers:

- Promotion of Access to Information Act, 2 of 2000
- Protection of Personal Information Act, 4 of 2013
- Income Tax Act, 58 of 1962
- Tax Administration Act, 28 of 2011
- Value Added Tax Act, 89 of 1991 (where applicable)
- Basic Conditions of Employment Act, 75 of 1997
- Labour Relations Act, 66 of 1995
- Employment Equity Act, 55 of 1998 (where applicable)
- Occupational Health and Safety Act, 85 of 1993
- Companies Act (where relevant to suppliers)
- Consumer Protection Act, 68 of 2008
- Financial Intelligence Centre Act (where applicable)
- Electronic Communications and Transactions Act, 25 of 2002

8. CATEGORIES OF RECORDS HELD

8.1 Corporate Records

- Business registration documents
- Tax registration records
- SARS correspondence
- Accounting records
- Financial statements
- Insurance policies
- Asset registers
- Business licences
- Compliance documentation

8.2 Financial Records

- Quotations
- Customer invoices
- Supplier invoices
- Purchase orders
- Payment records
- Banking records
- Cash books
- VAT records
- Audit documentation
- Credit notes
- Statements

8.3 Human Resource Records

- Employment contracts
- Employee files
- Leave records
- Payroll information
- Disciplinary records
- Performance records
- Training records

8.4 Customer Records

- Customer names
- Identity numbers (where required)
- Telephone numbers
- Email addresses
- Physical addresses
- Jewellery specifications
- CAD designs
- Manufacturing instructions
- Repair records
- Insurance valuations
- Warranty records
- Payment history
- Photographs of jewellery
- Customer correspondence

8.5 Workshop Records

- Job cards
- Repair history
- Manufacturing records
- Stone certificates
- Diamond grading reports
- Gemstone information
- Precious metal records
- Casting records
- CAD drawings
- Wax model files
- Production schedules
- Quality control documentation

8.6 Supplier Records

- Supplier agreements
- Purchase orders
- Supplier invoices
- Banking details
- Contact information
- Delivery documentation

8.7 Electronic Records

- Email correspondence
- Website enquiries
- Cloud backups
- CCTV footage
- Digital CAD files
- Electronic accounting records
- Electronic customer database

9. RECORDS AVAILABLE WITHOUT FORMAL REQUEST

Where appropriate and subject to availability, the following information may be provided without a formal PAIA request:

- General information regarding products and services.
- Business contact details.
- Trading hours.
- Public marketing material.
- Product catalogues.
- Warranty information.
- Jewellery care guides.
- Frequently Asked Questions.
- Privacy Notice.
- This PAIA Manual.

The business reserves the right to request identification where necessary.

10. PROCESSING OF PERSONAL INFORMATION

Marius Nel Jewellers processes personal information only where lawful and necessary for conducting business operations.

Processing takes place in accordance with the eight lawful processing conditions contained within POPIA.

Personal information is collected directly from customers whenever reasonably practicable.

10.1 Categories of Personal Information Processed

The business may process:

- Full names
- Identity numbers
- Passport numbers
- Telephone numbers
- Email addresses
- Physical addresses
- Postal addresses
- Banking details
- Payment information
- Jewellery ownership details
- Insurance valuations
- Purchase history
- Repair history
- Warranty records
- Photographs of jewellery
- CCTV footage
- Communications with customers

Employee information includes:

- Identity information
- Banking details
- Payroll records
- Leave records
- Employment contracts
- Emergency contacts

Supplier information includes:

- Company information
- Contact persons
- Banking details
- Tax information
- Quotations
- Purchase order

10.2 Purpose of Processing

Personal information is processed for:

- Manufacturing jewellery.
- Repairing jewellery.
- Creating CAD designs.
- Completing quotations.
- Processing customer orders.
- Insurance valuations.
- Warranty administration.
- Customer communication.
- Deliveries.
- Financial accounting.
- Tax compliance.
- Legal obligations.
- Employee administration.
- Security monitoring.
- Fraud prevention.
- Debt recovery where necessary.

10.3 Lawful Basis for Processing

Personal information is processed where:

- the customer has consented;
- processing is necessary to fulfil a contract;
- processing is required by law;
- processing protects legitimate interests of the customer; or
- processing serves the legitimate interests of the business.

11. RECIPIENTS OF PERSONAL INFORMATION

Personal information may be disclosed only where necessary to:

- SARS
- Financial institutions
- Insurance companies
- Courier companies
- Legal advisors
- Auditors
- IT service providers
- Cloud backup providers
- Regulatory authorities where legally required

The business does not sell customer information.

Personal information is never shared for unrelated marketing purposes without consent.

12. SECURITY SAFEGUARDS

Marius Nel Jewellers implements reasonable technical and organisational measures to protect personal information against unauthorised access, loss, destruction or disclosure.

Current safeguards include:

Physical Security

- Alarm system
- CCTV surveillance
- Access-controlled premises
- Locked filing cabinets
- Secure workshop
- Controlled key access

Electronic Security

- Password-protected computers
- Password-protected accounting software
- Cloud backups
- Antivirus software
- Firewall protection
- Secure email accounts

Administrative Security

- Staff confidentiality agreements
- Restricted access to customer records
- Confidential disposal of documents
- Regular password changes
- Limited user permissions

Security measures are reviewed periodically to ensure ongoing effectiveness.

5. INFORMATION OFFICER

5.1 Appointment of the Information Officer

In accordance with Section 56 of the Protection of Personal Information Act, 4 of 2013 ("POPIA") and Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), the owner of Marius Nel Jewellers is designated as the Information Officer.

As Marius Nel Jewellers operates as a sole proprietorship, no Deputy Information Officer has been appointed. The Information Officer is responsible for ensuring compliance with both PAIA and POPIA and serves as the primary point of contact for all requests relating to access to information and the protection of personal information.

Information Officer Details

Name: Marius Nel

Position: Owner / Information Officer

Business Name: Marius Nel Jewellers

Physical Address:

Shop 209A, Randridge Mall

Corner of John Vorster Drive & Kayburn Avenue

Randpark Ridge, Randburg

2196

Telephone: 063 049 5816

Email: info@mariusnel.co.za

5.2 Responsibilities of the Information Officer

The Information Officer has overall responsibility for ensuring that Marius Nel Jewellers complies with all applicable requirements of PAIA and POPIA.

These responsibilities include, but are not limited to, the following:

PAIA Compliance

- Maintaining and updating this PAIA Manual.
- Ensuring that the manual remains accurate, accessible and compliant with current legislation.
- Receiving, evaluating and responding to requests for access to records.
- Assisting requesters in exercising their rights under PAIA.
- Ensuring that requests are processed within the statutory timeframes.
- Determining whether access should be granted or refused in accordance with the provisions of PAIA.
- Maintaining a register of all PAIA requests received and the outcomes of such requests.
- Retaining records relating to access requests and decisions made.

POPIA Compliance

The Information Officer is responsible for promoting and monitoring compliance with the Protection of Personal Information Act by:

- Ensuring that personal information is processed lawfully, fairly and transparently.
- Monitoring compliance with the eight conditions for lawful processing of personal information.
- Developing, implementing and reviewing privacy and data protection policies.
- Ensuring that only personal information necessary for legitimate business purposes is collected.
- Promoting awareness of privacy obligations among employees and contractors.
- Ensuring that customers are informed of how their personal information is collected, used, stored and disclosed.

Information Security

The Information Officer oversees the implementation and maintenance of appropriate technical and organisational safeguards to protect information against unauthorised access, loss, destruction, alteration or disclosure.

This includes ensuring the effectiveness of:

- Password-protected computer systems.
- Secure cloud backup services.
- CCTV security systems.
- Alarm systems.
- Access-controlled premises.
- Locked filing cabinets.
- Secure storage of customer jewellery records.
- Confidential disposal of documents containing personal information.
- Staff confidentiality agreements.
- Regular reviews of physical and electronic security measures.

Management of Personal Information

The Information Officer is responsible for ensuring that:

- Personal information is accurate and kept up to date where reasonably practicable.
- Information is retained only for as long as required by law or for legitimate business purposes.
- Records are securely destroyed once retention periods expire.
- Personal information is disclosed only where legally authorised or with the consent of the data subject.
- Appropriate contractual safeguards are maintained with third-party service providers who process personal information on behalf of the business.

Data Subject Requests

The Information Officer is responsible for managing requests received from data subjects regarding their personal information, including requests to:

- Access personal information held by the business.
- Correct inaccurate or incomplete information.
- Update personal information.
- Object to the processing of personal information where permitted by law.
- Withdraw consent where processing is based on consent.
- Request deletion of personal information where applicable.

All requests shall be handled within the timeframes prescribed by POPIA and PAIA.

Personal Information Security Incidents

Where a security compromise involving personal information is identified, the Information Officer shall:

- Investigate the nature and extent of the incident.
- Take immediate steps to contain and mitigate the breach.
- Assess the risks posed to affected individuals.
- Notify the Information Regulator where notification is required by POPIA.
- Notify affected data subjects where there is a reasonable risk of harm.
- Maintain a register of all security incidents and corrective actions implemented.
- Review existing safeguards to prevent recurrence.

Employee Awareness and Confidentiality

The Information Officer shall ensure that all employees understand their obligations regarding confidentiality and the lawful handling of personal information.

Measures include:

- Confidentiality agreements.
- Staff induction on privacy requirements.
- Ongoing awareness of information security practices.
- Restricting access to information based on operational requirements.
- Monitoring compliance with internal privacy procedures.

Record Management

The Information Officer is responsible for ensuring that business records are:

- Properly classified.
- Securely stored.
- Easily retrievable when required.
- Protected against unauthorised access.
- Retained in accordance with legislative retention periods.
- Securely destroyed once no longer required.

Annual Review

This PAIA Manual shall be reviewed at least once every twelve (12) months, or sooner if required by legislative amendments, changes to business operations, or recommendations issued by the Information Regulator.

The Information Officer shall document each review and approve any amendments prior to publication.

5.3 Delegation of Functions

Although the Information Officer retains overall responsibility for compliance, certain administrative tasks relating to record management, customer communications or document administration may be delegated to authorised employees.

Such delegation does not transfer legal accountability. The Information Officer remains responsible for ensuring that all delegated functions are carried out in accordance with PAIA, POPIA and the internal policies of Marius Nel Jewellers.

5.4 Commitment to Compliance

Marius Nel Jewellers is committed to conducting its business with integrity, transparency and respect for the privacy rights of its customers, employees, suppliers and business partners.

The Information Officer will continually review and improve the business's information management practices to ensure ongoing compliance with applicable legislation and recognised best practices for the protection of personal information.

6. INFORMATION REGULATOR

6.1 Introduction

The Information Regulator is an independent statutory body established in terms of Section 39 of the Protection of Personal Information Act, 4 of 2013 ("POPIA"). The Regulator is responsible for monitoring and enforcing compliance with both the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and POPIA.

Its functions include:

- Promoting and protecting the constitutional right of access to information.
- Monitoring and enforcing compliance with PAIA and POPIA.
- Investigating complaints relating to access to information and the processing of personal information.
- Issuing guidance notes, codes of conduct and directives.
- Receiving and investigating complaints from members of the public.
- Educating public and private bodies regarding their obligations under PAIA and POPIA.
- Registering Information Officers and maintaining the Information Officer eServices Portal.
- Taking appropriate enforcement action where legislative requirements have not been met.

6.2 Assistance Available from the Information Regulator

Any person who requires assistance in exercising a right under PAIA or POPIA may contact the Information Regulator for guidance.

The Information Regulator provides assistance relating to:

- Access to records held by public and private bodies.
- Interpretation of PAIA and POPIA.
- Registration of Information Officers.
- Complaints regarding refusals of access to information.
- Complaints relating to the unlawful processing of personal information.
- Security compromises involving personal information.
- Data subject rights under POPIA.
- Guidance documents, forms and compliance resources.

6.3 Contact Details of the Information Regulator

Physical Address

Woodmead North Office Park, 54 Maxwell Drive, Woodmead
Johannesburg, 2191

Postal Address

P.O. Box 31533, Braamfontein
Johannesburg, 2017

Telephone

010 023 5200

Toll-Free Number

0800 017 160

General Enquiries

enquiries@inforegulator.org.za

PAIA Complaints

PAIAComplaints@inforegulator.org.za

POPIA Complaints

POPIAComplaints@inforegulator.org.za

Official Website

<https://inforegulator.org.za>

Information Officer eServices Portal

<https://eservices.inforegulator.org.za>

6.4 Guide on Access to Information

In terms of Section 10 of PAIA, the Information Regulator has compiled and maintains a comprehensive guide to assist persons who wish to exercise their rights under PAIA.

The Guide contains information relating to:

- The purpose and objectives of PAIA.
- The manner in which requests for access to information must be submitted.
- The prescribed request forms.
- Applicable fees.
- Available remedies where access is refused.

- Contact details of Information Officers.
- The rights of requesters and responsible parties.
- Assistance available from the Information Regulator.

The Guide is available:

- On the Information Regulator's official website.
- At the offices of the Information Regulator during normal business hours.
- In all official South African languages.
- In accessible formats where available.

6.5 Lodging a Complaint with the Information Regulator

A requester or data subject who believes that:

- access to a record has been wrongly refused;
- a request has not been dealt with within the prescribed time period;
- personal information has been processed unlawfully;
- personal information has been compromised; or
- any provision of PAIA or POPIA has been contravened,

may lodge a complaint with the Information Regulator using the prescribed complaint procedure.

Where appropriate, the Information Regulator may investigate the complaint, facilitate resolution between the parties, issue enforcement notices, or take any other action authorised by PAIA or POPIA.

6.6 Information Officer Registration

Private bodies are required to register their Information Officers with the Information Regulator through the official eServices Portal before exercising the powers and performing the duties assigned under POPIA.

Marius Nel Jewellers will ensure that its Information Officer registration remains current and that any changes to the Information Officer's particulars are updated with the Information Regulator without undue delay.

6.7 Commitment to Cooperation

Marius Nel Jewellers is committed to cooperating fully with the Information Regulator in the performance of its statutory functions and will promptly respond to any lawful requests, investigations, compliance assessments or directives issued under PAIA or POPIA.

The business further undertakes to maintain open communication with the Information Regulator and to implement any reasonable recommendations aimed at improving compliance with South African information and privacy legislation.

7. CATEGORIES OF RECORDS HELD

7.1 Introduction

In terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), Marius Nel Jewellers maintains various categories of records in the ordinary course of conducting its business.

The records listed below may be held in physical or electronic format and include records created, received or maintained by the business.

The inclusion of a category of records in this Manual does not imply that such records are automatically available for inspection or copying. Access to records remains subject to the provisions of PAIA, POPIA and any other applicable legislation.

7.2 Administration Records

The business maintains administrative records necessary for the operation and management of the business, including:

- Business registration documentation
- Sole proprietorship records
- Business licences and permits
- Insurance policies
- Asset registers
- Office administration records
- Internal correspondence
- Compliance documentation
- Policies and procedures
- PAIA Manual
- POPIA compliance records
- Risk assessments
- Incident reports
- Business continuity documentation

7.3 Financial and Accounting Records

Financial records maintained by the business include:

- Annual Financial Statements
- General ledger
- Trial balances

- Cash books
- Bank statements
- Payment records
- Receipts
- Customer invoices
- Supplier invoices
- Credit notes
- Debit notes
- Purchase orders
- Sales reports
- Accounting journals
- Expense records
- Asset depreciation schedules
- Insurance claims
- Inventory valuations
- Stock movement reports
- Cash-up records
- Credit card transaction records

7.4 Taxation Records

The business maintains taxation records including:

- Income Tax returns
- SARS correspondence
- Tax clearance certificates
- VAT returns (where applicable)
- EMP201 returns (where applicable)
- EMP501 reconciliations
- PAYE records
- UIF contributions
- SDL records
- Supporting tax documentation

7.5 Human Resources Records

Where employees are engaged, records include:

Employee Information

- Employment applications
- Curriculum Vitae
- Identity documents
- Employment contracts
- Confidentiality agreements
- Payroll records
- Leave records
- Attendance records
- Performance reviews
- Training records
- Disciplinary records
- Salary information
- Banking details
- Emergency contact information
- Resignation documentation

7.6 Customer Records

Customer records maintained during the normal course of business include:

Customer Identification

- Customer names
- Identity numbers (where required)
- Passport numbers (where applicable)
- Telephone numbers
- Email addresses
- Residential addresses
- Postal addresses

Customer Transactions

- Quotations
- Sales orders
- Customer invoices
- Payment history
- Deposits received
- Refund records
- Warranty information
- Repair authorisations
- Collection confirmations

Jewellery Records

- Jewellery specifications
- Precious metal information
- Diamond details
- Coloured gemstone details
- Stone certificates
- Jewellery descriptions
- Ring sizes
- Finger measurements
- Custom manufacturing specifications
- Engraving instructions
- Insurance valuation reports
- Manufacturing notes

Digital Records

- CAD drawings
- Computer-generated renders
- Design revisions
- Wax model files
- Production specifications
- Customer approvals
- Digital artwork

Photographic Records

- Photographs of jewellery
- Progress photographs
- Before-and-after repair photographs
- Insurance claim photographs
- Custom design reference images

7.7 Jewellery Manufacturing Records

The workshop maintains records relating to manufacturing operations, including:

- Job cards
- Manufacturing schedules
- Production instructions
- CAD design files
- CAM production files
- Wax printing files
- Casting records
- Precious metal usage
- Alloy records
- Stone setting instructions
- Workshop quality inspections
- Polishing records
- Rhodium plating records
- Final quality control reports
- Manufacturing completion reports

7.8 Jewellery Repair Records

Repair documentation includes:

- Repair quotations
- Customer instructions
- Repair authorisations
- Job cards
- Repair history
- Workshop notes
- Photographs before repair
- Photographs after repair
- Parts replaced

- Stones replaced
- Metal additions
- Laser welding records
- Collection confirmations
- Warranty on repairs

7.9 Diamond and Gemstone Records

Records relating to gemstones include:

- Diamond certificates
- Gemstone certificates
- Supplier certificates
- Stone grading reports
- Stone measurements
- Stone origin documentation (where available)
- Authentication reports
- Laboratory certificates
- Stone replacement records

7.10 Supplier Records

Supplier records include:

- Supplier contact details
- Supplier agreements
- Supplier quotations
- Purchase orders
- Delivery notes
- Supplier invoices
- Statements
- Banking details
- Tax information
- Precious metal suppliers
- Diamond suppliers
- Gemstone suppliers
- Packaging suppliers

7.11 Marketing Records

Marketing records may include:

- Website content
- Product catalogues
- Social media content
- Promotional campaigns
- Customer newsletters
- Customer mailing lists (where consent has been obtained)
- Competition entries
- Event records

7.12 Website Records

Where customers interact through the business website, records may include:

- Website enquiry forms
- Contact requests
- Customer messages
- Newsletter subscriptions
- Cookies (where applicable)
- Website analytics
- Server logs

7.13 Electronic Communication Records

Electronic records maintained by the business include:

- Email correspondence
- Electronic quotations
- Electronic invoices
- Customer approvals
- Supplier correspondence
- Digital signatures
- Electronic payment confirmations
- Cloud backup records
- Shared electronic documents

7.14 Security Records

Security-related records include:

- CCTV footage
- Alarm activation reports
- Visitor records
- Incident reports
- Access control records
- Security contractor reports
- Insurance security documentation

7.15 Information Technology Records

IT records include:

- Computer inventory
- Software licences
- Backup schedules
- Password management procedures
- Cloud storage records
- Cybersecurity reports
- Firewall logs
- Antivirus reports
- Disaster recovery documentation

7.16 Legal and Compliance Records

The business maintains legal and compliance documentation including:

- PAIA Manual
- POPIA documentation
- Privacy notices
- Customer consent records
- Information Officer registration records
- Complaints register
- Data breach register
- Compliance audits
- Legal opinions
- Court documents (where applicable)
- Insurance legal correspondence

7.17 Record Formats

Records may exist in one or more of the following formats:

Physical Records

- Paper files
- Printed contracts
- Signed quotations
- Job cards
- Design sketches
- Laboratory certificates

Electronic Records

- PDF documents
- Microsoft Word documents
- Microsoft Excel spreadsheets
- Accounting software records
- CAD design files
- Digital photographs
- Email correspondence
- Cloud storage records
- CCTV recordings

7.18 Retention of Records

Records are retained for periods prescribed by applicable legislation, contractual obligations, insurance requirements and legitimate business purposes.

Upon expiry of the applicable retention period, records are securely destroyed or permanently deleted using appropriate methods designed to prevent unauthorised access or reconstruction of the information.

7.19 Access to Records

Access to records held by Marius Nel Jewellers will only be granted:

- upon receipt of a valid PAIA request;
- where the requester has complied with the requirements of PAIA;
- where no lawful grounds for refusal apply; and
- subject to the privacy rights of customers, employees, suppliers and other third parties as protected under POPIA and other applicable legislation.

The business reserves the right to refuse access to records where disclosure would be unlawful or where the requested records are exempt from disclosure in terms of PAIA.

8. RECORDS AUTOMATICALLY AVAILABLE WITHOUT A FORMAL PAIA REQUEST

8.1 Introduction

In accordance with section 15 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA"), certain records held by Marius Nel Jewellers may be made available to members of the public without requiring the submission of a formal PAIA request.

Where reasonably practicable, these records will be provided upon request during normal business hours, subject to any applicable reproduction fees and the availability of the records.

The availability of these records does not prevent the business from withholding confidential or personal information where disclosure would be unlawful or contrary to the provisions of PAIA or the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA").

8.2 Records Routinely Available

The following categories of information are generally available without the need to submit a formal PAIA request:

Company Information

- Business name and trading details
- Physical address
- Postal address (where applicable)
- Contact telephone numbers
- Email addresses
- Website information
- Trading hours
- General description of products and services offered

Public Marketing Information

- Product catalogues
- Jewellery collections
- Promotional brochures
- Marketing material
- Social media content
- Educational articles published by the business
- General pricing information (where publicly advertised)

Customer Information

Customers may request access to information relating specifically to themselves, including:

- Copies of quotations issued to them
- Sales invoices
- Jewellery repair receipts
- Warranty information
- Insurance valuation certificates prepared for their jewellery
- Manufacturing progress updates
- Photographs of their own jewellery
- CAD design renderings commissioned by them (where ownership rights permit)
- Order history
- Payment receipts

Proof of identity may be required before any personal information is released.

Employment Information

Current and prospective employees may request access to records relating to themselves, including:

- Employment contracts
- Leave records
- Payroll information
- IRP5 certificates
- Performance-related records (where applicable)
- Employment policies
- Workplace procedures

Access will only be granted to the employee concerned or an authorised representative.

Consumer Information

The following information is available to customers upon request:

- Jewellery care instructions
- Warranty terms and conditions
- Repair procedures
- Manufacturing process information
- Diamond and gemstone information
- Precious metal information
- Cleaning and maintenance guidelines

Legal and Regulatory Information

Copies of the following documents may be made available where applicable:

- This PAIA Manual
- POPIA Privacy Notice
- Complaint procedures
- Information Officer contact details
- Customer Terms and Conditions
- Warranty Terms and Conditions

8.3 Website Information

Where published on the Marius Nel Jewellers website, the following information is freely accessible:

- Company profile
- Contact information
- Product galleries
- Services offered
- Jewellery care advice
- Privacy Notice
- PAIA Manual
- Terms and Conditions
- Warranty information

8.4 Method of Access

Records that are automatically available may be obtained by:

- Visiting the business premises during normal trading hours;
- Requesting copies by email;
- Downloading documents from the company website (where available); or
- Requesting copies by telephone or written correspondence.

Reasonable copying, printing or reproduction fees may apply where hard copies are requested.

8.5 Information Not Automatically Available

The following categories of records are **not** automatically available and may only be accessed through a formal PAIA request where applicable:

- Customer personal information
- Identity documents
- Banking information
- CCTV recordings
- Jewellery repair records belonging to other customers
- CAD design files
- Manufacturing specifications
- Financial records
- Tax records
- Supplier pricing
- Trade secrets
- Employee records relating to other employees
- Internal correspondence
- Legal advice
- Insurance documentation
- Security system information
- Passwords and access credentials

Disclosure of these records will only occur where required by law and subject to the provisions of PAIA and POPIA.

8.6 Right to Refuse Access

Although certain records are generally available, Marius Nel Jewellers reserves the right to refuse access where:

- disclosure would infringe another person's privacy;
- confidential commercial information would be revealed;
- legal privilege applies;
- disclosure could prejudice security measures;
- disclosure would violate POPIA; or
- another ground for refusal under PAIA applies.

Each request will be considered on its own merits and in accordance with applicable legislation.

8.7 Availability of the PAIA Manual

This PAIA Manual is available:

- At the business premises during normal office hours;
- By written request to the Information Officer;
- By email upon request; and
- On the company website once published.

No fee will be charged for inspection of the manual. Reasonable reproduction charges may apply for printed copies.

9. JEWELLERY INDUSTRY-SPECIFIC RECORDS

9.1 Purpose

As a manufacturer, repairer and retailer of fine jewellery, Marius Nel Jewellers maintains specialised records that are unique to the jewellery industry. These records are created during the design, manufacture, sale, repair, valuation and servicing of jewellery and are essential for providing quality workmanship, maintaining customer service standards, meeting legal obligations and supporting insurance requirements.

Many of these records contain confidential commercial information, intellectual property, personal information and proprietary manufacturing techniques. Access to these records is regulated in accordance with the Promotion of Access to Information Act, 2000 (PAIA) and the Protection of Personal Information Act, 2013 (POPIA).

9.2 Custom Jewellery Design Records

Records relating to bespoke jewellery commissions may include:

- Customer design consultations
- Jewellery concept sketches
- Hand-drawn design artwork
- Computer Aided Design (CAD) files
- Three-dimensional renderings
- Wax model specifications
- Design revisions
- Customer design approvals
- Manufacturing specifications
- Technical drawings
- Casting instructions
- Metal weight calculations
- Production notes

These records constitute valuable intellectual property and confidential commercial information.

9.3 Manufacturing Records

Records generated during jewellery manufacture include:

- Job cards
- Workshop production schedules
- Manufacturing instructions
- Stone setting instructions
- Metal allocation records
- Casting records
- Quality control inspections
- Manufacturing progress reports
- Workshop photographs
- Final inspection records
- Delivery confirmations

9.4 Jewellery Repair Records

Repair records maintained by the business may include:

- Repair intake forms
- Customer repair instructions
- Photographs before repair
- Photographs after repair
- Damage assessments
- Stone condition reports
- Metal condition reports
- Repair quotations
- Workshop repair notes
- Repair completion records
- Customer collection confirmations
- Warranty records relating to repairs

These records assist in documenting the condition of jewellery before and after repair and may be retained for insurance and liability purposes.

9.5 Diamond and Gemstone Records

Where applicable, records relating to diamonds and coloured gemstones include:

- Diamond grading certificates
- Laboratory certificates
- Gemstone identification reports
- Stone measurements
- Stone weight records
- Colour grading information
- Clarity grading information
- Cut information
- Stone origin information (where available)
- Matching reports
- Supplier certification

Examples of recognised laboratory certificates include those issued by internationally recognised gemmological laboratories.

9.6 Jewellery Valuation Records

Insurance valuation records may include:

- Valuation certificates
- Jewellery descriptions
- Metal specifications
- Diamond grading details
- Gemstone specifications
- Replacement value calculations
- Photographs
- Supporting documentation
- Date of valuation
- Valuer details

These records are prepared for insurance, estate planning or replacement purposes and remain confidential.

9.7 Precious Metal Records

The business may maintain records relating to:

- Precious metal purchases
- Gold, platinum and silver stock
- Alloy specifications
- Metal assay information
- Metal usage during manufacture
- Refining records
- Metal recovery records
- Supplier invoices
- Precious metal inventory

9.8 Supplier and Procurement Records

Records relating to suppliers may include:

- Purchase orders
- Supplier quotations
- Supplier invoices
- Delivery notes
- Diamond and gemstone purchases
- Precious metal purchases
- Trade agreements
- Supplier contact information
- Payment records
- Import documentation (where applicable)

These records contain confidential commercial information.

9.9 Customer Jewellery Records

Customer records relating to jewellery may include:

- Jewellery specifications
- Custom manufacturing instructions
- Ring sizes

- Finger measurements
- Stone preferences
- Metal preferences
- Engraving instructions
- Insurance valuation requests
- Repair history
- Warranty claims
- Collection records
- Photographs of completed jewellery

9.10 Photographic Records

The business may retain photographic images for legitimate business purposes, including:

- Jewellery prior to repair
- Jewellery after repair
- Custom manufactured pieces
- Insurance valuation records
- Manufacturing progress
- Marketing material (with customer consent where applicable)
- Warranty documentation
- Quality control records

Photographs containing identifiable customer information will be processed in accordance with POPIA.

9.11 Intellectual Property

The following records constitute proprietary intellectual property belonging to Marius Nel Jewellers unless otherwise agreed in writing:

- Original jewellery designs
- CAD files
- Manufacturing drawings
- Technical production specifications
- Design concepts
- Workshop processes
- Production methods
- Original artistic works

- Manufacturing templates
- Proprietary techniques

These records will generally not be disclosed where disclosure would prejudice the commercial interests of the business or infringe intellectual property rights.

9.12 Security Records

For the protection of customers, employees and valuable stock, the business maintains security-related records which may include:

- CCTV recordings
- Alarm activation records
- Access control logs
- Visitor registers
- Incident reports
- Security contractor reports
- Inventory audit records

Access to these records is strictly controlled and will only be granted where authorised by law.

9.13 Confidentiality of Jewellery Records

Due to the nature of the jewellery industry, many records maintained by Marius Nel Jewellers contain:

- Personal information;
- Confidential commercial information;
- Proprietary manufacturing techniques;
- Intellectual property;
- Supplier pricing;
- Security-sensitive information; and
- Insurance-related documentation.

Disclosure of these records may be refused where permitted under PAIA, including where disclosure could:

- prejudice the commercial interests of the business;
- reveal trade secrets;
- compromise security measures;
- infringe the privacy of customers or suppliers;
- violate contractual confidentiality obligations; or
- conflict with the provisions of POPIA.

Each request for access to jewellery industry-specific records will be assessed individually in accordance with applicable legislation.

10. PROTECTION OF PERSONAL INFORMATION ACT (POPIA) COMPLIANCE

10.1 Purpose

Marius Nel Jewellers is committed to protecting the privacy and personal information of its customers, employees, suppliers and other stakeholders in accordance with the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA").

The business recognises that personal information is valuable and must be collected, processed, stored and destroyed responsibly, lawfully and securely.

This section outlines the measures adopted to ensure compliance with POPIA and demonstrates the business's commitment to protecting the constitutional right to privacy.

10.2 Scope

This policy applies to all personal information processed by Marius Nel Jewellers, regardless of whether the information is stored:

- Electronically;
- In paper records;
- On mobile devices;
- In cloud-based systems;
- In email correspondence;
- In photographs; or
- In any other form capable of identifying an individual.

The policy applies to all employees, contractors and service providers who process personal information on behalf of the business.

10.3 Responsible Party

Marius Nel Jewellers acts as the **Responsible Party** for personal information processed in the course of conducting its business.

The Information Officer is responsible for ensuring compliance with POPIA and maintaining appropriate information governance practices.

10.4 Personal Information Collected

Depending on the nature of the relationship with the business, personal information collected may include:

Customer Information

- Full names
- Identity or passport numbers

- Telephone numbers
- Email addresses
- Residential or business addresses
- Jewellery specifications
- Insurance valuation information
- Banking details (where required for refunds or payments)
- Purchase history
- Repair history
- Warranty information
- Photographs of jewellery
- Photographs supplied by customers for design purposes
- Communication records

Employee Information

- Identity documents
- Contact details
- Employment contracts
- Payroll information
- Banking details
- Tax information
- Leave records
- Performance records
- Emergency contact details

Supplier Information

- Company registration details
- Contact persons
- Banking information
- Tax numbers
- Invoices
- Quotations
- Payment records

10.5 Purpose for Processing Personal Information

Personal information is processed only for legitimate business purposes, including:

- Manufacturing custom jewellery;
- Repairing jewellery;
- Issuing quotations;
- Processing orders;
- Completing sales transactions;
- Issuing invoices;
- Processing payments;
- Delivering products;
- Preparing insurance valuations;
- Providing warranties;
- Maintaining customer records;
- Communicating with customers;
- Complying with legal and tax obligations;
- Managing employees;
- Procuring goods and services;
- Maintaining workshop records;
- Security and fraud prevention;
- Maintaining CCTV security systems; and
- Resolving disputes or customer complaints.

Personal information will not be processed for purposes incompatible with those for which it was originally collected.

10.6 Lawful Basis for Processing

Personal information is processed only where permitted under POPIA, including where:

- the data subject has given consent;
- processing is necessary to conclude or perform a contract;
- processing is required by law;
- processing protects a legitimate interest of the data subject;
- processing is necessary for the proper performance of a public law duty; or
- processing is necessary for the legitimate interests of Marius Nel Jewellers or a third party, provided such interests are not overridden by the rights of the data subject.

10.7 Conditions for Lawful Processing

Marius Nel Jewellers complies with the eight conditions for lawful processing contained in POPIA.

Accountability

The Information Officer is responsible for ensuring ongoing compliance with POPIA and for implementing appropriate policies, procedures and safeguards.

Processing Limitation

Only personal information that is adequate, relevant and not excessive is collected.

Information is collected directly from the data subject wherever reasonably practicable.

Purpose Specification

Personal information is collected for specific, explicitly defined and lawful purposes.

The purpose of collection is communicated to the data subject at or before collection.

Further Processing Limitation

Personal information will not be processed for unrelated purposes unless permitted by POPIA.

Information Quality

Reasonable steps are taken to ensure that personal information is complete, accurate, current and not misleading.

Openness

Data subjects are informed about:

- what information is collected;
- why it is collected;
- how it will be used;
- who may receive it; and
- their rights under POPIA.

Security Safeguards

Reasonable technical and organisational measures are implemented to protect personal information against:

- loss;
- unauthorised access;
- destruction;
- misuse;
- unlawful disclosure;
- alteration; and
- cyber threats.

Data Subject Participation

Data subjects have the right to:

- request access to their personal information;
- request correction or updating of inaccurate information;
- request deletion where legally permissible;
- object to certain processing activities;
- withdraw consent where applicable; and
- lodge complaints with the Information Regulator.

10.8 Special Personal Information

Marius Nel Jewellers does not intentionally collect or process special personal information unless permitted by POPIA or required by law.

Should such information be received, it will be processed only where a lawful justification exists and appropriate safeguards are implemented.

10.9 Personal Information of Children

The business does not knowingly collect personal information relating to children unless:

- consent has been obtained from a competent parent or legal guardian;
- processing is required by law; or
- another lawful ground under POPIA applies.

10.10 Sharing of Personal Information

Personal information will not be sold, rented or disclosed to third parties for marketing purposes.

Information may only be shared where necessary with:

- payment service providers;
- financial institutions;
- insurers;
- authorised courier companies;
- information technology service providers;
- cloud storage providers;
- legal advisers;
- auditors;
- regulatory authorities; or
- government departments where disclosure is required by law.

All service providers are expected to maintain appropriate confidentiality and security measures.

10.11 Security Measures

Marius Nel Jewellers has implemented reasonable safeguards to protect personal information, including:

Physical Security

- Locked filing cabinets
- Restricted office access
- Alarm system
- CCTV monitoring
- Controlled workshop access
- Secure storage of customer jewellery

Electronic Security

- Password-protected computers
- User authentication
- Antivirus and malware protection
- Secure email systems
- Regular software updates
- Cloud backups
- Access controls
- Limited user permissions

Administrative Security

- Confidentiality agreements
- Limited access to personal information
- Secure disposal of documents
- Staff awareness regarding confidentiality obligations
- Controlled release of information

Security measures are reviewed periodically and updated where appropriate.

10.12 Retention of Personal Information

Personal information is retained only for as long as:

- required by law;
- necessary to fulfil the purpose for which it was collected;
- required for warranty purposes;
- required for insurance valuation history;

- necessary for tax compliance;
- necessary for legal proceedings; or
- required by contractual obligations.

Once information is no longer required, it is securely destroyed or permanently de-identified where appropriate.

10.13 Destruction of Personal Information

Records containing personal information are destroyed using secure methods appropriate to the medium, including:

- shredding of paper documents;
- permanent deletion of electronic records;
- secure destruction of backup media where applicable; and
- disposal in accordance with recognised information security practices.

10.14 Data Breach Management

Where Marius Nel Jewellers becomes aware of a security compromise involving personal information, the Information Officer will:

1. investigate the incident;
2. contain the breach;
3. assess affected information;
4. notify affected individuals where required;
5. notify the Information Regulator where legally required;
6. document corrective actions; and
7. implement measures to prevent recurrence.

10.15 Direct Marketing

The business will only send marketing communications where permitted by POPIA and applicable electronic communications legislation.

Recipients may opt out of receiving marketing communications at any time.

The business maintains records of marketing preferences and respects requests to unsubscribe.

10.16 CCTV Processing

CCTV is used for legitimate security purposes, including:

- protection of customers;
- protection of employees;
- safeguarding jewellery and other valuable assets;
- crime prevention;

- investigation of incidents; and
- insurance purposes.

Access to CCTV recordings is strictly limited to authorised persons and recordings will only be disclosed where required by law or for legitimate legal purposes.

10.17 Cross-Border Transfers

Where personal information is stored on cloud-based systems or processed outside South Africa, Marius Nel Jewellers will take reasonable steps to ensure that such transfers comply with Chapter 9 of POPIA and that appropriate contractual or legal safeguards are in place.

10.18 Data Subject Rights

Every data subject has the right to:

- be informed about the collection of personal information;
- access their personal information;
- request correction of inaccurate information;
- request deletion where appropriate;
- object to processing;
- withdraw consent where processing is based on consent;
- object to direct marketing;
- submit complaints to the Information Officer; and
- lodge complaints with the Information Regulator.

Requests may be submitted to the Information Officer using the contact details contained in this Manual.

10.19 Compliance Review

The Information Officer will periodically review the business's POPIA compliance programme to ensure that policies, procedures and security safeguards remain effective and continue to comply with applicable legislation.

This manual and associated privacy practices will be reviewed whenever there are significant legislative changes, operational changes or information security risks identified.

11. SECURITY SAFEGUARDS

11.1 Purpose

Marius Nel Jewellers recognises that the protection of personal information, confidential business records and valuable customer property is fundamental to maintaining trust and complying with the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA").

Appropriate technical, physical and organisational safeguards have been implemented to protect information against loss, theft, unauthorised access, alteration, destruction and unlawful disclosure.

Security measures are reviewed periodically and updated where necessary to address changing operational requirements and emerging security risks.

11.2 Information Security Objectives

The objectives of the business's information security programme are to:

- protect the confidentiality of personal information;
- maintain the integrity and accuracy of business records;
- ensure information remains available when required for legitimate business purposes;
- prevent unauthorised access to customer and employee information;
- protect confidential commercial information and intellectual property;
- safeguard valuable jewellery entrusted to the business; and
- comply with applicable legislation, including PAIA and POPIA.

11.3 Physical Security Measures

To protect both information and valuable assets, Marius Nel Jewellers maintains appropriate physical security measures, including:

Premises Security

- Alarm system protecting the premises.
- Controlled access through an access-control gate.
- Locked entrances outside business hours.
- Secure workshop area with restricted access.
- Controlled access to offices where confidential records are stored.

CCTV Surveillance

Closed-circuit television (CCTV) is installed to assist with:

- protection of customers;
- protection of employees;

- safeguarding jewellery and other valuable assets;
- monitoring access to the premises;
- crime prevention;
- investigation of incidents; and
- insurance purposes.

Access to CCTV recordings is restricted to authorised persons and recordings are retained only for as long as reasonably necessary or as required for legal or insurance purposes.

Secure Storage

Confidential records are protected by:

- locked filing cabinets;
- secure storage cupboards;
- restricted access to customer files;
- secure storage of completed valuations;
- controlled access to jewellery repair records; and
- secure storage of customer jewellery awaiting collection.

11.4 Electronic Security Measures

Electronic information is protected through multiple layers of security.

Computer Security

Business computers are protected by:

- individual user passwords;
- password-protected operating systems;
- automatic screen locking after periods of inactivity;
- limited administrator access;
- regularly updated operating systems; and
- antivirus and malware protection.

Network Security

Where applicable, the business maintains:

- secure internet connections;
- password-protected wireless networks;
- firewall protection where available;
- encrypted communication where appropriate; and
- restricted network access.

Cloud Storage

Electronic records stored in cloud-based services are protected through:

- password-protected accounts;
- secure authentication procedures;
- regular cloud backups;
- restricted user permissions; and
- reputable cloud service providers implementing appropriate security controls.

11.5 Access Control

Access to personal information is limited strictly to individuals who require such access to perform their duties.

The business applies the principle of **least privilege**, ensuring that users have access only to the information necessary for their specific responsibilities.

Access controls include:

- password authentication;
- restricted file permissions;
- controlled access to customer records;
- restricted access to financial records;
- restricted access to employee records;
- controlled workshop documentation; and
- management oversight of sensitive information.

11.6 Confidentiality Measures

All persons who have access to confidential information are expected to maintain strict confidentiality.

Measures include:

- staff confidentiality agreements;
- confidentiality obligations contained in employment contracts;
- restrictions on discussing customer information outside legitimate business purposes;
- secure handling of customer documentation;
- confidentiality regarding jewellery designs and CAD files; and
- protection of supplier pricing and commercial information.

Personal information will not be disclosed unless:

- authorised by the data subject;

- required by law;
- necessary to perform contractual obligations; or
- otherwise permitted under PAIA or POPIA.

11.7 Protection of Customer Jewellery

As part of normal business operations, customers entrust valuable jewellery to Marius Nel Jewellers for manufacture, repair, resizing, restoration, cleaning and valuation.

Reasonable measures are implemented to safeguard customer property, including:

- documented job cards;
- repair intake records;
- condition assessments;
- secure workshop storage;
- restricted handling by authorised personnel;
- photographic records where appropriate;
- collection verification procedures; and
- controlled release of completed work.

11.8 Protection of Intellectual Property

The business maintains valuable intellectual property, including:

- original jewellery designs;
- CAD drawings;
- manufacturing specifications;
- production methods;
- technical drawings;
- design concepts; and
- workshop processes.

These records are treated as confidential commercial information and access is restricted to authorised personnel.

Unauthorised copying, reproduction or disclosure is prohibited.

11.9 Email and Electronic Communication

Employees and authorised users are expected to exercise reasonable care when communicating electronically.

Security measures include:

- verifying recipient details before sending confidential information;
- limiting the transmission of personal information to what is necessary;
- avoiding disclosure of confidential information to unauthorised persons;
- maintaining password security; and
- reporting suspected phishing or cyber incidents promptly.

11.10 Record Retention and Disposal

Personal information is retained only for as long as required by law or for legitimate business purposes.

When records are no longer required, they are securely destroyed through appropriate methods, including:

Paper Records

- cross-cut shredding;
- secure disposal; or
- destruction by an authorised service provider.

Electronic Records

- permanent deletion;
- secure wiping of storage media where appropriate;
- removal from active systems and backups where reasonably practicable; and
- destruction of obsolete storage devices before disposal.

11.11 Security Incident Management

Any suspected or actual information security incident must be reported immediately to the Information Officer.

Examples include:

- loss of customer information;
- theft of records;
- unauthorised disclosure;
- computer malware;
- hacking attempts;
- accidental emailing of confidential information;
- stolen devices;
- unauthorised access to customer records; or
- compromise of passwords.

The Information Officer will:

1. investigate the incident;
2. assess the risks;
3. contain the incident where possible;
4. preserve relevant evidence;
5. determine whether notification is required under POPIA;
6. notify affected parties where legally required;
7. notify the Information Regulator where applicable; and
8. implement corrective measures to reduce the likelihood of recurrence.

11.12 Third-Party Service Providers

Where external service providers process personal information on behalf of Marius Nel Jewellers, reasonable steps are taken to ensure that such providers:

- maintain appropriate security safeguards;
- process information only on documented instructions;
- protect confidentiality;
- comply with applicable legislation; and
- notify the business of any security incidents affecting personal information.

Examples may include:

- cloud storage providers;
- information technology support providers;
- accounting service providers;
- payment processors;
- courier companies; and
- professional advisers.

11.13 Continuous Improvement

Information security is an ongoing process. Marius Nel Jewellers is committed to periodically reviewing and improving its security practices to address changes in technology, business operations and legal requirements.

Reviews may include:

- assessment of physical security measures;
- review of access controls;
- evaluation of electronic security systems;
- testing of backup procedures;
- verification of record retention practices;
- staff awareness and confidentiality obligations; and
- updates to policies and procedures where necessary.

11.14 Responsibility

The Information Officer is responsible for overseeing the implementation and maintenance of appropriate security safeguards.

All employees, contractors and service providers who process personal information on behalf of Marius Nel Jewellers are required to:

- comply with this Manual;
- maintain confidentiality;
- protect personal information against unauthorised disclosure;
- report security incidents immediately; and
- cooperate with investigations into any suspected breach of information security.

Failure to comply with these requirements may result in disciplinary action, termination of contractual relationships or other legal remedies where appropriate.

12. DATA RETENTION SCHEDULE

12.1 Purpose

Marius Nel Jewellers retains records only for as long as is necessary to fulfil the purpose for which they were collected, to comply with applicable legislation, to protect the legitimate interests of the business and its customers, and to support legal, insurance and taxation requirements.

Once records are no longer required, they will be securely destroyed or permanently de-identified in accordance with the business's Record Disposal Procedure.

12.2 Retention Principles

The business applies the following principles when retaining records:

- Records are retained only for legitimate business or legal purposes.
- Personal information is not retained longer than necessary.
- Statutory retention periods take precedence where prescribed by law.
- Records subject to legal proceedings, investigations or insurance claims will not be destroyed until the matter has been finally resolved.
- Electronic and paper records are subject to the same retention requirements.
- Secure destruction methods are used once the retention period expires.

12.3 Record Retention Schedule

| Record Category | Minimum Retention Period | Reason for Retention |
|--|---|---|
| Customer quotations | 3 years | Customer service, dispute resolution and business reference |
| Customer orders | 5 years | Contractual obligations and customer service |
| Sales invoices | 5 years | Tax Administration Act and financial records |
| Purchase invoices | 5 years | Accounting and tax compliance |
| Payment records | 5 years | Financial auditing and taxation |
| Banking records | 5 years | Financial compliance |
| Tax records | 5 years (or longer if required by SARS) | Legislative compliance |
| Annual financial statements | 7 years | Accounting and audit purposes |
| Insurance policies | Duration of policy plus 5 years | Claims and legal purposes |
| Insurance valuation certificates | 7 years | Customer service and insurance reference |
| Jewellery repair records | 7 years | Warranty, insurance and dispute resolution |
| Manufacturing job cards | 7 years | Quality assurance and customer support |
| CAD design files | 7 years after completion unless otherwise agreed | Customer reference and intellectual property protection |
| Design approval records | 7 years | Proof of customer approval |
| Jewellery photographs | 7 years | Insurance, quality control and dispute resolution |
| Warranty records | Warranty period plus 3 years | Customer support and legal protection |
| Precious metal purchase records | 5 years | Financial and inventory control |
| Supplier invoices | 5 years | Financial and taxation purposes |
| Supplier contracts | Contract duration plus 5 years | Legal compliance |
| Customer correspondence | 3 years | Customer service and dispute resolution |
| Complaint records | 5 years after resolution | Legal protection and quality improvement |
| CCTV recordings | Normally 30–90 days, unless required for an investigation, insurance claim or legal proceedings | Security and crime prevention |
| Visitor registers | 12 months | Security management |
| Employee personnel files | 5 years after termination of employment | Employment legislation and legal protection |
| Employment contracts | 5 years after termination | Employment records |
| Payroll records | 5 years | BCEA and tax compliance |
| Leave records | 3 years | BCEA compliance |
| Training records | Duration of employment plus 3 years | Human resources management |
| Health and safety incident records | As required by applicable legislation | Occupational health and safety compliance |
| PAIA requests and responses | 5 years | Regulatory compliance |
| POPIA complaints | 5 years after closure | Compliance monitoring |
| Information security incident records | 5 years | Risk management and compliance |
| Information Officer compliance records | Permanently while superseded versions are archived for at least 5 years | Governance and audit trail |

12.4 Records Subject to Legal Hold

Where the business becomes aware of:

- pending litigation;
- arbitration;
- criminal investigations;
- insurance claims;
- SARS investigations;
- regulatory investigations; or
- any formal dispute,

all relevant records must be preserved until the matter has been concluded, irrespective of the normal retention period.

The Information Officer may suspend the destruction of records where necessary.

12.5 Electronic Record Retention

Electronic records are retained using secure storage systems, including cloud-based backup services where applicable.

Reasonable measures are implemented to ensure:

- continued accessibility;
- protection against unauthorised alteration;
- secure backups;
- disaster recovery capability; and
- controlled access.

Electronic records are periodically reviewed to identify information that has reached the end of its retention period.

12.6 Secure Destruction of Records

Once the applicable retention period has expired and no legal or operational reason exists to retain the record, information will be securely destroyed.

Paper Records

Paper records are destroyed by:

- cross-cut shredding;
- secure document destruction services; or
- other methods that render the information permanently unreadable.

Electronic Records

Electronic records are destroyed through:

- permanent deletion from business systems;

- secure wiping of storage devices where appropriate;
- deletion from cloud storage in accordance with the provider's procedures; and
- destruction or sanitisation of obsolete electronic media before disposal.

Where reasonably practicable, backup copies containing expired information will also be removed in accordance with the business's backup retention practices.

12.7 Review of Retention Schedule

This Data Retention Schedule will be reviewed:

- annually;
- following significant legislative changes;
- following operational changes affecting record management;
- after any significant information security incident; or
- whenever deemed necessary by the Information Officer.

Amendments to this schedule will be approved by the Information Officer and incorporated into future revisions of this Manual.

12.8 Responsibility

The Information Officer is responsible for overseeing compliance with this Data Retention Schedule.

All employees and contractors who create, maintain or process records on behalf of Marius Nel Jewellers are responsible for:

- complying with the retention periods specified in this Manual;
- protecting records against unauthorised access or destruction;
- reporting any unauthorised disposal of records; and
- ensuring that records are disposed of only in accordance with approved procedures.

13. PAIA Request Procedures

13.1 Purpose

The Promotion of Access to Information Act, 2000 (PAIA), provides any person with the right to request access to records held by private bodies where such records are required for the exercise or protection of any rights.

Marius Nel Jewellers supports the constitutional right of access to information while balancing the need to protect confidential business information, personal information and commercially sensitive records in accordance with applicable legislation.

13.2 Who May Request Information

Any natural or juristic person may submit a request for access to records held by Marius Nel Jewellers.

The requester may be:

- an individual requesting access to their own personal information;
- a customer requesting business records relating to themselves;
- an authorised representative acting on behalf of another person;
- a company requesting records required to exercise or protect a legal right; or
- any other person who satisfies the requirements of PAIA.

Where a request is made on behalf of another person, written proof of authority must accompany the request.

13.3 Prescribed Request Form

All requests must be submitted using the prescribed PAIA Request Form issued under the PAIA Regulations.

The request must include:

- Full names of the requester
- Identity or registration number
- Postal address
- Residential or business address
- Telephone number
- Email address
- Sufficient details to identify the requested record
- The right that the requester seeks to exercise or protect
- An explanation of why the requested record is required
- Preferred manner of access
- Proof of identity
- Proof of authority where applicable

Incomplete applications may delay processing.

13.4 Submission of Requests

Requests should be submitted to the Information Officer using one of the following methods:

Email

info@mariusnel.co.za

Physical Address

Marius Nel Jewellers

Shop 209A, Randridge Mall, Corner John Vorster Drive & Kayburn Avenue

Randpark Ridge, Randburg

2196

Telephone

063 049 5816

Electronic submission is preferred.

13.5 Verification of Identity

Before releasing any personal information, the Information Officer may require:

- Certified copy of an Identity Document;
- Certified copy of a Passport;
- Proof of residential address;
- Company registration documents;
- Letter of authority;
- Power of Attorney;
- Any additional documentation reasonably required to verify identity.

This verification process protects the privacy of customers and complies with POPIA.

13.6 Processing of Requests

Upon receipt of a valid request, the Information Officer will:

1. Record the request in the PAIA Register.
2. Verify the identity of the requester.
3. Confirm payment of any prescribed request fee where applicable.
4. Determine whether the requested records exist.
5. Consider whether access should be granted or refused under PAIA.
6. Notify the requester of the outcome within the statutory time period.

13.7 Timeframes

The Information Officer will respond within **30 calendar days** after receipt of a valid request.

The response period may be extended for a further period permitted under PAIA where:

- large volumes of records are requested;
- consultation with third parties is necessary;
- records are archived or difficult to retrieve;
- additional searches are required;
- exceptional circumstances exist.

The requester will be informed in writing should an extension be necessary together with the reasons for the extension.

13.8 Request Fees

Certain requests may require payment of prescribed fees in accordance with PAIA Regulations.

Fees may include:

- Request fee
- Search and preparation fee
- Reproduction fee
- Postage or courier costs
- Electronic reproduction costs

A quotation of applicable fees will be provided before processing continues where required.

No records will be released until all applicable fees have been paid.

13.9 Forms of Access

Where access is granted, records may be made available in one or more of the following formats:

- Inspection at the business premises
- Printed copies
- Certified copies
- Electronic PDF copies
- Email
- USB device supplied by the requester where appropriate
- Any other reasonable format permitted by PAIA

The requested format will be accommodated where reasonably practicable.

13.10 Grounds for Refusal

Access may be refused where permitted under PAIA, including but not limited to:

- Protection of personal information of third parties
- Commercially confidential information
- Confidential information supplied by third parties
- Trade secrets
- Intellectual property
- Legal privilege
- Safety or security considerations
- Information prohibited from disclosure by another law
- Records relating to ongoing investigations or litigation
- Requests that are manifestly frivolous or vexatious

Where only part of a record is exempt from disclosure, access may be granted to the remainder of the record where reasonably possible.

13.11 Third Party Notification

Where a request involves records containing information relating to a third party, the Information Officer may notify the affected third party in accordance with PAIA.

The third party may:

- consent to disclosure;
- object to disclosure; or
- make written representations to the Information Officer.

The Information Officer will consider all submissions before making a decision.

13.12 Access to Personal Information

Individuals may request access to personal information held about themselves.

Before releasing any personal information, Marius Nel Jewellers will verify:

- the identity of the requester;
- the requester's entitlement to the information; and
- that disclosure will not adversely affect the rights of another individual.

Reasonable measures will be taken to prevent unauthorised disclosure.

13.13 Correction of Personal Information

Where personal information is inaccurate, incomplete, misleading or outdated, data subjects may request:

- correction;
- updating;
- deletion where legally permissible; or
- destruction of personal information.

Requests must be submitted in writing to the Information Officer.

Supporting documentation may be requested before amendments are made.

13.14 Withdrawal of Requests

A requester may withdraw a PAIA request at any time before the requested records have been released.

Where search or preparation work has already been undertaken, any applicable fees may remain payable.

13.15 Internal Register

The Information Officer maintains a confidential register recording:

- Date received
- Reference number
- Name of requester
- Description of records requested
- Fees paid
- Decision taken
- Date finalised
- Reasons for refusal where applicable

The register assists with legal compliance, audit purposes and internal monitoring.

13.16 Appeals and Remedies

As a sole proprietorship and private body, Marius Nel Jewellers does not have an internal appeal procedure under PAIA.

If a requester is dissatisfied with the outcome of a request, they may:

- lodge a complaint with the Information Regulator; or
- apply to a court of competent jurisdiction for appropriate relief as provided for in PAIA.

The Information Officer will cooperate fully with any lawful investigation conducted by the Information Regulator.

13.17 Assistance to Requesters

The Information Officer will provide reasonable assistance to individuals who require help completing a PAIA request, particularly where literacy, language or disability may prevent a requester from completing the prescribed forms.

Such assistance will be provided in a fair, impartial and non-discriminatory manner.

13.18 Contact Details for PAIA Requests

Information Officer

Marius Nel

Owner and Information Officer

Marius Nel Jewellers

Shop 209A, Randridge Mall

Corner John Vorster Drive & Kayburn Avenue

Randpark Ridge

Randburg

2196

Telephone: 063 049 5816

Email: info@mariusnel.co.za

14. Grounds for Refusal of Access to Records

14.1 Purpose

While the Promotion of Access to Information Act promotes transparency and accountability, it also recognises that certain information requires protection. Marius Nel Jewellers will consider every request on its own merits and may refuse access where permitted or required by PAIA.

Access will only be refused where lawful grounds exist under the Act.

14.2 Mandatory Protection of Personal Information

Access must be refused where disclosure would involve the unreasonable disclosure of personal information relating to a third party, unless:

- the third party has consented to disclosure;
- the information is already publicly available;
- disclosure is required by law; or
- another exception under PAIA applies.

Examples include:

- Identity numbers
- Residential addresses
- Telephone numbers
- Email addresses
- Banking information
- Employment records
- Customer purchase history
- Insurance valuations containing personal information

14.3 Commercial Information

Access may be refused where disclosure could reasonably be expected to:

- prejudice the commercial interests of Marius Nel Jewellers;
- reveal confidential pricing structures;
- disclose supplier pricing or discounts;
- expose manufacturing processes;
- reveal proprietary CAD designs;
- disclose jewellery manufacturing techniques;
- reveal trade secrets;
- disclose confidential customer quotations or costing models.

14.4 Confidential Information Supplied by Third Parties

Records received from suppliers, customers, insurers, financial institutions, laboratories or service providers in confidence may be withheld where disclosure would constitute a breach of that confidence.

Examples include:

- Supplier agreements
- Diamond grading reports
- Gemstone certificates
- Insurance correspondence
- Valuation reports prepared for insurers
- Customer design briefs
- Independent expert reports

14.5 Protection of Safety and Security

Access may be refused where disclosure could reasonably be expected to compromise the security of:

- customers;
- employees;
- business premises;
- safes or vaults;
- alarm systems;
- CCTV systems;
- access control systems;
- inventory management systems; or
- security procedures.

This includes information that could facilitate theft, robbery, fraud or unlawful entry.

14.6 Legally Privileged Information

Access may be refused where records are protected by legal professional privilege, including communications between Marius Nel Jewellers and its legal advisers relating to:

- legal opinions;
- pending litigation;
- dispute resolution;
- debt recovery;
- contractual advice; or
- regulatory matters.

14.7 Records Protected by Other Legislation

Access may be refused where another law prohibits disclosure, including but not limited to records protected under:

- Protection of Personal Information Act, 2013;
- Income Tax Act;
- Value-Added Tax Act;
- Basic Conditions of Employment Act;
- Labour Relations Act;
- Companies legislation (where applicable);
- Financial Intelligence Centre Act; and
- any other applicable South African legislation.

14.8 Frivolous or Vexatious Requests

The Information Officer may refuse requests that are:

- manifestly frivolous;
- repetitive;
- intended to harass;
- unreasonable in scope;
- made in bad faith; or
- likely to unreasonably disrupt the operations of the business.

14.9 Records That Do Not Exist

PAIA provides a right of access only to records that actually exist.

Marius Nel Jewellers is not obliged to:

- create new records;
- compile information that does not exist;
- answer questions;
- provide explanations; or
- perform research on behalf of a requester.

Where a requested record cannot be located after a reasonable search, the requester will be informed accordingly.

14.10 Partial Disclosure

Where only a portion of a record is exempt from disclosure, the Information Officer will consider granting access to the remainder after removing or redacting the protected information.

14.11 Notification of Refusal

If access is refused, the requester will receive written notification stating:

- that access has been refused;
- the statutory grounds for refusal;
- sufficient reasons for the decision; and
- the remedies available under PAIA.

14.12 Right to Lodge a Complaint or Approach a Court

Where a requester is dissatisfied with the decision, they may:

- submit a complaint to the Information Regulator; or
- apply to a court of competent jurisdiction for appropriate relief in accordance with PAIA.

15. Approval of the Manual

This manual has been prepared in accordance with the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), as amended, and incorporates the applicable requirements of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013).

The manual has been approved for implementation by the Information Officer of Marius Nel Jewellers and will be reviewed periodically to ensure continued compliance with applicable legislation and business practices.

This manual becomes effective from the date of signature below and supersedes any previous versions.

Document Control

| Item | Details |
|------------------|-------------------------------|
| Document Title | PAIA Manual |
| Business Name | Marius Nel Jewellers |
| Version | 1.0 |
| Effective Date | 30 June 2026 |
| Next Review Date | 1 May 2027 |
| Approved By | Marius Nel |
| Position | Owner and Information Officer |

16. Signature Page

Declaration

I hereby certify that this PAIA Manual has been reviewed and approved for implementation by Marius Nel Jewellers.

I undertake to ensure that this manual is maintained, reviewed periodically and made available in accordance with the requirements of the Promotion of Access to Information Act, 2000.

Information Officer

Name: Marius Nel

Position: Owner and Information Officer

Business: Marius Nel Jewellers

Signature: 

Date: 30 June 2026

Business Stamp (Optional)

(Affix company stamp here, if applicable.)

Revision History

| Version | Date | Description | Approved By |
|---------|-------|---------------|-------------|
| 1.0 | _____ | Initial Issue | Marius Nel |

Distribution List

This manual is maintained by the Information Officer and is made available to:

- Members of the public upon request;
- Employees of Marius Nel Jewellers where applicable;
- The Information Regulator upon request;
- Customers and business partners where appropriate; and
- Publication on the business website.