PAIA Manual

Prepared in accordance with section 51 of PAIA

Current legal contact	privacy@ovitoz.co.za

1. Introduction

Ovitoz is a rewards programme operator that operates a digital rewards ecosystem through which participating customers or members may access, earn, receive, redeem or otherwise benefit from rewards, discounts, benefits, incentives and promotional offerings. Ovitoz works with participating merchants, retailers, sponsors and other commercial partners (“Brand Partners”) to make these rewards and benefits available to members, including by linking rewards to qualifying purchases, sales, transactions, programme activities, campaigns or other eligibility criteria.

In the course of operating the Ovitoz rewards programme, Ovitoz creates, receives, stores and processes a variety of records relating to its members, prospective members, Brand Partners, service providers, employees, contractors and other persons with whom Ovitoz interacts. These records include information relating to programme participation, rewards, qualifying transactions, marketing activities, commercial arrangements, technology systems and the administration of the Ovitoz business.

Section 32 of the Constitution of the Republic of South Africa, 1996 recognises the right of access to information. The Promotion of Access to Information Act 2 of 2000 (“PAIA”) gives effect to this constitutional right by establishing mechanisms through which persons may request access to records held by public and private bodies.

Section 51 of PAIA requires private bodies to prepare and make available a manual containing prescribed information relating to the records held by the body and the manner in which those records may be accessed. This Manual has accordingly been prepared in accordance with section 51 of PAIA.

This Manual should also be read together with the Protection of Personal Information Act 4 of 2013 (“POPIA”), the regulations issued under PAIA and POPIA, and Ovitoz's Privacy Policy or Privacy Notice, as amended from time to time. POPIA regulates the lawful processing of personal information and amended certain provisions of PAIA in order to balance the right of access to information with the right to privacy and the protection of personal information.

The purpose of this Manual is to provide members of the public with a practical description of the records held by Ovitoz, the procedure for requesting access to such records, the circumstances in which access may be refused, and the rights available to data subjects in respect of personal information processed by Ovitoz.

2. Definitions and interpretation

- “Brand Partner” means a merchant, retailer, service provider, sponsor, advertiser, commercial partner or other participating business that makes rewards, discounts, benefits, incentives, promotions or other offerings available through or in connection with Ovitoz.
- “Data Subject” and “Personal Information” have the meanings assigned to those terms under POPIA.
- “Information Officer” means the person who has been appointed or is deemed to be the Information Officer of Ovitoz for purposes of PAIA and POPIA, and “Deputy Information Officer” means any person designated to assist the Information Officer in the performance of those functions.

- “Member” means a person who registers for, participates in or otherwise uses the Ovitoz rewards programme.
- “Requester” means a person who requests access to a record in accordance with PAIA.
- “Ovitoz” means Ovitoz (Pty) Ltd, trading as Ovitoz. References in this Manual to the “Rewards Programme” include the Ovitoz programme and any associated website, mobile application, digital platform, interface or service through which members may access or use programme functionality.

3. Purpose of the manual

This Manual is intended to assist persons who wish to understand what information Ovitoz holds and how access to that information may be requested. It provides a description of the principal subjects on which Ovitoz holds records, identifies categories of information that may be available without a formal PAIA request and explains the procedure for submitting a request for access to information.

The Manual also provides the contact details of the Information Officer and any designated Deputy Information Officer responsible for assisting requesters and data subjects. In addition, it describes the categories of personal information processed by Ovitoz, the purposes for which such information is processed, the categories of recipients to whom information may be disclosed, possible transfers of personal information outside South Africa and the general security measures adopted by Ovitoz.

The Manual further explains the remedies available where Ovitoz refuses a request for access and provides information on how data subjects may exercise applicable rights under POPIA.

4. Ovitoz details

The details of the private body to which this Manual applies are as follows:

Registered name	Ovitoz (Pty) Ltd
Trading name	Ovitoz
Registration number	2026/251230/07
Registered address	Midrand, Gauteng, 1687, South Africa
Telephone	+27 64 528 0264
Website	www.ovitoz.co.za
Email	privacy@ovitoz.co.za

5. Information Officer

Ovitoz has appointed or recognises an Information Officer responsible for overseeing compliance with PAIA and POPIA. The Information Officer is responsible for receiving and considering requests for access to records, assisting requesters where appropriate, overseeing requests relating to personal information and ensuring that Ovitoz's obligations under applicable access-to-information and data-protection legislation are appropriately administered.

Ovitoz may designate one or more Deputy Information Officers to assist the Information Officer. The details of any Deputy Information Officer will be made available through Ovitoz's website or on request. All formal PAIA requests and POPIA-related requests should be directed at the Information Officer or a duly designated Deputy Information Officer.

Telephone	+27 64 528 0264
Email	privacy@ovitoz.co.za

Physical address	Midrand, Gauteng, 1687, South Africa

6. Availability of this manual

This Manual will be made available on the Ovitoz website at www.ovitoz.co.za and may also be inspected at Ovitoz's principal place of business during normal business hours, subject to reasonable arrangements being made in advance where necessary.

An electronic copy may be requested from the Information Officer. Ovitoz will also provide the Manual to the Information Regulator where required.

The Manual may be amended from time to time to reflect changes in the law, Ovitoz's business activities, the nature of the records it holds or the manner in which it processes personal information. The most recent published version will replace previous versions.

7. Guide on how to use PAIA

The Information Regulator has prepared and made available a Guide in terms of section 10 of PAIA to assist persons who wish to exercise rights under PAIA and POPIA. The Guide explains the objects of the legislation, how requests for access to records may be submitted, what assistance is available from Information Officers and the Information Regulator, what fees may be payable and what remedies are available if a request is refused or a person believes that their rights have been infringed.

The Guide may be obtained from the Information Regulator and is available through the Regulator's official channels.

Information Regulator (South Africa)	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Email	enquiries@inforegulator.org.za
Toll-free	0800 017 160

8. Records available without a formal PAIA request

Certain information relating to Ovitoz may be publicly available without requiring a formal request under PAIA. This would ordinarily include information that Ovitoz has deliberately made available through its website, applications, public-facing documents or marketing channels.

Publicly available information may include Ovitoz's programme terms and conditions, Privacy Policy or Privacy Notice, programme rules, frequently asked questions, publicly advertised rewards and promotions, information concerning participating Brand Partners, marketing or promotional material, press releases, published corporate information and general contact information.

The fact that a category of record is referred to in this section does not mean that every document within that category will necessarily be available to the public. Confidential, commercial, personal or otherwise protected information may remain subject to the limitations and grounds for refusal contained in PAIA.

9. Records held in terms of other legislation

Ovitoz is required to create and retain certain records in accordance with legislation applicable to its business and operations. Depending on the particular circumstances of the business and its employment, tax, corporate, commercial and technology activities, relevant legislation may include the Companies Act 71 of 2008, Consumer Protection Act 68 of 2008, Protection of Personal Information Act 4 of 2013, Promotion of Access to Information Act 2 of 2000, Electronic Communications and Transactions Act 25 of 2002, Income Tax Act 58 of 1962, Value-Added Tax Act 89 of 1991 and Tax Administration Act 28 of 2011.

Where Ovitoz has employees, it may also hold records under applicable employment legislation, including the Basic Conditions of Employment Act 75 of 1997, Labour Relations Act 66 of 1995, Employment Equity Act 55 of 1998, Skills Development Act 97 of 1998, Skills Development Levies Act 9 of 1999, Unemployment Insurance Act 63 of 2001, Unemployment Insurance Contributions Act 4 of 2002 and Compensation for Occupational Injuries and Diseases Act 130 of 1993.

Ovitoz may additionally hold records relevant to intellectual property, competition, anti-corruption and other legal obligations under legislation such as the Copyright Act 98 of 1978, Trade Marks Act 194 of 1993, Competition Act 89 of 1998 and Prevention and Combating of Corrupt Activities Act 12 of 2004.

The inclusion of legislation in this section does not mean that Ovitoz necessarily holds records under every provision of the relevant legislation. Rather, it identifies legislation under which records may be created or retained depending on Ovitoz's operations from time to time.

10. Categories of records held by Ovitoz

Ovitoz holds records arising from the ordinary operation and administration of its business. These include corporate, commercial, operational, financial, technological and customer-related records. The inclusion of a record category in this Manual does not mean that access to a particular record will necessarily be granted.

10.1 Corporate, governance and legal records

Ovitoz may hold records relating to its incorporation, corporate structure, shareholders, directors, prescribed officers and governance arrangements. These may include incorporation documents, the Memorandum of Incorporation, statutory registers, shareholder and director records, board and shareholder resolutions, minutes of meetings, delegations of authority and internal governance policies.

Legal and compliance records may include contracts, commercial agreements, Brand Partner agreements, supplier and service provider agreements, confidentiality agreements, terms and conditions, intellectual property records, compliance policies, legal opinions, regulatory correspondence, complaints, dispute records, litigation records, privacy documentation and information relating to PAIA and POPIA requests.

10.2 Member records

Ovitoz may hold records relating to persons who register for or participate in the Rewards Programme. These records may include registration and profile information, names, contact details, account identifiers, authentication information, membership status, preferences, communication choices and consent records.

Because rewards may be generated from qualifying transactions or activities, Ovitoz may also hold transaction-linked information received from Brand Partners or other authorised sources. This may include information showing that a qualifying purchase or transaction occurred, associated reward entitlement, reward allocation and redemption history, voucher or benefit usage, campaign participation and related programme activity.

Ovitoz may further hold correspondence, enquiries, complaints, feedback, survey responses and customer-support records relating to Members.

10.3 Rewards programme records

Ovitoz may create and retain records concerning the design, administration and operation of its Rewards Programme. These may include programme rules, reward eligibility criteria, reward calculations, benefits and discount structures, reward allocations, redemptions, expiries, reversals, vouchers, promotional codes and campaign configurations.

Ovitoz may also maintain reconciliation records showing rewards or benefits funded, allocated or fulfilled through Brand Partners, as well as records concerning programme performance, Member engagement and investigations into suspected programme abuse or fraud.

10.4 Brand Partner records

Ovitoz may hold records relating to Brand Partners participating in the Rewards Programme. These may include corporate and contact information, commercial agreements, onboarding and due diligence documentation, campaign arrangements, reward structures, benefit rules and correspondence.

Where a Brand Partner supplies transaction or sales information so that Ovitoz can determine whether Members qualify for rewards, Ovitoz may retain the relevant transaction feeds, eligibility records, data-exchange documentation and reconciliation records. Ovitoz may also hold information relating to campaign performance, invoices, payments, technical integrations, APIs and data-sharing arrangements.

10.5 Marketing and communication records

Ovitoz may hold records concerning its marketing strategies, promotional campaigns, Member communications, newsletters, social media activity, advertisements and promotional offerings. These records may include direct-marketing consents, cookie and tracking consent records, preference-center selections, opt-outs and withdrawals, campaign engagement, conversion events and attribution records, including records relating to the Meta Pixel and related Meta technologies where deployed with prior consent.

Where Ovitoz uses data to tailor or personalise rewards or communications, it may hold Member segmentation, campaign analytics, engagement metrics and related profiling information. These records are maintained subject to the requirements of POPIA and Ovitoz's applicable privacy documentation.

10.6 Information technology and digital platform records

As a digitally operated rewards programme, Ovitoz may hold records relating to its technology environment and digital platform. These may include software and system documentation, database records, system architecture, user manuals, access controls, authentication records, logs, APIs, integration documentation, cybersecurity records, cloud infrastructure records, backups and disaster recovery documentation.

Ovitoz may also process records generated through use of its website or mobile application, including device and browser information, IP addresses, online and device identifiers, strictly necessary/session cookies, functional or preference cookies, analytics cookies, software development kits (SDKs), tracking pixels, third-party cookies, platform activity and application usage information. Optional analytics, marketing and attribution technologies that transmit Personal Information or online identifiers to third parties are disabled by default and are only activated after the required prior affirmative consent has been obtained.

10.6.1 Cookie, pixel, consent and attribution records

Ovitoz may hold cookie identifiers, device and browser information, IP addresses, pages or events viewed, preference selections and conversion events. Strictly necessary cookies may operate to provide or secure requested Platform functionality. Optional analytics, marketing and attribution technologies — including the Meta Pixel and related Meta cookies where used — are disabled by default and must not load, drop a cookie, fire, transmit an event or otherwise disclose Personal Information or online identifiers to a third party before the required prior, explicit and affirmative consent is obtained. Ovitoz may retain consent logs to demonstrate the user's selection, the categories accepted or rejected, the version of the notice presented and subsequent withdrawal or amendment of consent.

These records include each Member's cookie-consent choices (essential, analytics and marketing) and the referral codes and network click identifiers recorded when a Member arrives through a referral link or partner deal link.

10.6.2 Authentication, messaging and third-party integration records

Ovitoz may retain authentication and integration records associated with connected accounts, social logins, messaging services and third-party technology providers, including identifiers and permissions supplied through services such as Google, Pinterest or Instagram where those integrations are offered. Chatbot and messaging records may include message content, conversation history, AI-assisted responses, metadata, escalation to human support and the consent records associated with those interactions.

10.6.3 Location and geofencing records

Where enabled or otherwise lawfully processed, Ovitoz may hold precise or approximate location information, GPS coordinates, IP-derived location, sensor data, Wi-Fi positioning, Bluetooth beacon interactions, geofence entry and exit events and location history. These records may be used for rewards validation, partner check-ins, location-based offers, fraud prevention, nearby promotions, event attendance and merchant verification. Background location tracking is subject to express authorisation and may be withdrawn through the applicable device or Platform controls.

10.6.4 Health, wellness and activity records

Where a Member voluntarily enables health, wellness or fitness functionality, Ovitoz may hold special personal information relating to physical activity and fitness. This may include step count, active and resting heart rate, heart-rate zones, active energy burned, structured workout metadata, weight, blood pressure, activity type, duration and location, sleep or mindfulness data, VO2 Max and movement trends. Records may originate from the Member or, where authorised, from connected services or devices such as Apple Health, Google Health / Google Fit or Strava. Ovitoz may also retain records evidencing the Member's express consent, device permissions, connection status and withdrawal of permissions.

10.7 Financial and accounting records

Ovitoz may hold financial records arising from the operation of its business, including financial statements, management accounts, invoices, payments, banking records, tax records, budgets, forecasts, audit records and financial reconciliations.

These records may include financial information relating to Brand Partner arrangements, reward funding, programme settlements, supplier payments and related accounting controls.

10.8 Supplier and service provider records

Ovitoz may retain records concerning suppliers, technology providers, consultants and other service providers. Such records may include identification and contact details, commercial agreements, confidentiality agreements, service-level agreements, invoices, payment information, due diligence documentation and performance records.

Where a service provider processes personal information on behalf of Ovitoz, Ovitoz may also retain operator agreements, data-processing agreements, security assessments and related privacy and information-security records.

10.9 Human resources records

Where applicable, Ovitoz may hold employee and contractor records relating to recruitment, employment, remuneration, leave, performance, training, disciplinary matters, benefits and termination.

Ovitoz may also retain statutory employment, payroll, tax, health and safety and other personnel-related records required in the ordinary course of employment administration.

11. Categories of requesters

Requests for access to records may be made by different categories of persons. A person may request records concerning themselves, act as the authorised representative of another person or request access to records concerning a third party where the requirements of PAIA are satisfied.

Public bodies and other persons may also request records in circumstances contemplated by PAIA where access is required for the exercise or protection of a right.

12. Personal information processed by Ovitoz

Ovitoz processes personal information relating to a number of categories of data subjects, principally Members and prospective Members of the Rewards Programme. Ovitoz may also process information relating to users of its website or applications, representatives and employees of Brand Partners, suppliers, service providers, contractors, employees, prospective employees, directors, shareholders, complainants and other persons who interact with Ovitoz.

The nature of the personal information processed will depend on the particular relationship and the services used. In the case of Members, this may include names, contact details, account and profile information, online identifiers, authentication information, preferences, marketing choices, transaction-linked information, reward earning and redemption history, voucher usage, engagement data, correspondence, complaints and website or application usage information.

Ovitoz may process device identifiers, IP addresses, cookies and similar information generated through use of its digital services. Where specific Ovitoz functionality requires it, Ovitoz may also process location information or geofencing information.

12.1 Consent gatekeeper

The Ovitoz web Platform applies a prior-consent gatekeeper for non-essential third-party tracking. A prominent consent banner is displayed before optional marketing or third-party tracking is activated. The banner identifies relevant categories and purposes, identifies material third-party recipients such as Meta, provides a clear choice to accept or reject optional tracking and provides access to more detailed cookie information. Consent is not inferred from silence, continued browsing, inactivity or pre-selected choices. Users may withdraw or change consent through the cookie preference centre or equivalent controls. Creating an account, joining the Rewards Programme, continuing to browse or accepting the general Privacy Policy does not itself constitute consent to Meta Pixel or other optional third-party marketing tracking.

12.2 Meta Pixel and B2C waitlist attribution

Where Ovitoz deploys the Meta Pixel and related technologies supplied by Meta Platforms, Inc. or its relevant affiliates (“Meta”), the technology may, after the required consent is obtained, process cookie identifiers, device and browser information, IP address, pages or events viewed, interactions with Ovitoz advertisements or webpages and conversion events. The stated purpose is principally to measure and attribute conversions for the Ovitoz business-to-consumer (B2C) waitlist engine, evaluate campaign effectiveness and understand whether advertising results in relevant Platform actions.

12.3 Cookies, online identifiers and tracking

Ovitoz processes online identifiers and tracking information according to the function of the relevant technology. Strictly necessary/session cookies support authentication, security, session management and core navigation. Functional or preference cookies remember user settings. Analytics technologies measure Platform performance. Marketing and advertising technologies may measure campaign performance and attribute conversions. Optional analytics, marketing and attribution technologies that transmit Personal Information or online identifiers to third parties are subject to a consent-before-processing model.

12.4 Special personal information

Ovitoz may process special personal information where a feature or service requires it and the applicable requirements of POPIA have been satisfied. This includes health and physical-activity information and biometric information. Health telemetry is used for the purposes described in the Privacy Policy, including calculating reward token (OVI/Vitos) allocation and verifying movement plausibility. Ovitoz does not sell, license or monetise raw health data to medical schemes, insurers or data brokers. Where consent is the lawful basis or is otherwise required for special personal information, Ovitoz will obtain the relevant express consent and maintain appropriate consent records.

13. Purposes for which personal information is processed

Ovitoz processes personal information primarily to operate and administer the Rewards Programme. This includes registering Members, creating and maintaining Member accounts, authenticating access and determining whether a Member qualifies for a particular reward, benefit, discount or incentive.

Personal information may be used to link qualifying transactions or activities to Members and to calculate, allocate, issue, redeem, reverse, cancel or expire rewards. Information may be exchanged with Brand Partners where necessary to verify qualifying activity, administer a campaign, reconcile benefits or fulfil a reward.

Ovitoz may also process information to communicate with Members, respond to enquiries and complaints, provide customer support, administer promotions and improve the Rewards Programme. Subject to applicable law, Member information may be analysed to understand programme usage, Member engagement and reward preferences and to develop more relevant benefits and programme functionality.

Where permitted by applicable law, personal information may be used for marketing and promotional communications. Ovitoz may maintain records of consents, communication preferences, opt-outs and marketing engagement for this purpose.

Ovitoz further processes personal information where necessary to protect the integrity and security of the Rewards Programme, prevent fraud or misuse, comply with contractual and legal obligations, manage its relationships with Brand Partners and service providers, conduct financial administration and manage employment and recruitment matters.

Subject to prior affirmative consent where required, Ovitoz may process limited Personal Information, online identifiers and event information for marketing measurement, campaign attribution and related advertising purposes, including conversion measurement for the Ovitoz B2C waitlist engine.

Where a Member enables background health synchronisation, Ovitoz may periodically access and synchronise authorised health information from connected devices or health platforms for the authorised rewards and wellness purposes. Synchronisation may continue until the Member revokes the relevant permission or disables the feature. Background location tracking likewise occurs only where expressly authorised.

Ovitoz may use Personal Information to personalise rewards, improve AI recommendations, recommend products or participating merchants, personalise wellness journeys, provide chatbot responses, generate predictive analytics and improve Member experiences. AI-generated recommendations are intended to assist Members and are not medical, healthcare or professional advice.

14. Recipients of personal information

Ovitoz may disclose personal information to third parties where this is reasonably necessary for the operation of its business or the Rewards Programme, and where disclosure is permitted under POPIA.

In particular, information may be shared with Brand Partners where necessary to verify, allocate, fund, redeem or fulfil a reward or other benefit. Ovitoz may also use technology, hosting, cloud, communications, customer-support, analytics, marketing, payment, voucher or fulfilment service providers that require access to limited personal information in order to perform services on Ovitoz's behalf.

Personal information may also be disclosed to professional advisers, auditors, banks, regulators, tax authorities, law-enforcement agencies, courts, tribunals and other public authorities where required or permitted by law.

Any operator processing personal information on behalf of Ovitoz is expected to process the information only for authorised purposes and subject to appropriate contractual and security requirements.

Participation by a Brand Partner in the Ovitoz Rewards Programme does not, by itself, confer unrestricted access to Member information. Personal information should only be shared where a lawful basis exists and to the extent reasonably necessary for the relevant purpose.

14.1 Operators, responsible parties and contractual controls

Ovitoz documents relevant third-party processing arrangements within its Data Processing and Operator Agreement framework. Where a third-party acts as an Operator for Ovitoz, the applicable agreement should require processing only with Ovitoz's authorisation, confidentiality, appropriate security safeguards, notification of security compromises and assistance with applicable POPIA obligations. Where a third-party acts as an independent or joint Responsible Party rather than solely as an Operator, Ovitoz will use an appropriate data-sharing or other contractual arrangement reflecting the parties' actual roles and responsibilities. Participation as a Brand Partner does not confer unrestricted access to Member information.

14.2 Third-party technology, marketing and attribution providers

Subject to the applicable lawful basis and prior consent where required, Ovitoz may make limited Personal Information, online identifiers or event information available to third-party technology providers for analytics, marketing measurement, campaign attribution and related advertising purposes. This may include Meta in connection with the Meta Pixel and related technologies. The information involved depends on the technology and interaction and may include cookie or device identifiers, IP address, browser information, page or event information and B2C waitlist conversion events.

15. Transborder flows of personal information

Ovitoz may use technology providers, cloud infrastructure providers, analytics services, software providers, communications platforms, artificial intelligence services or other operators whose systems or personnel are located outside South Africa.

As a result, personal information may in certain circumstances be transferred to, stored in or accessed from countries outside South Africa.

Ovitoz will undertake such transfers in accordance with section 72 of POPIA and any other applicable legal requirements. Where required, appropriate contractual, technical and organisational safeguards will be put in place to ensure that personal information transferred outside South Africa receives an adequate level of protection.

16. Information security

Ovitoz recognises that appropriate safeguards are necessary to protect the confidentiality, integrity and availability of personal and confidential information.

Ovitoz will implement reasonable and appropriate technical and organisational security measures having regard to the nature of the information processed, the risks associated with the processing and the technology reasonably available to Ovitoz.

These measures may include authentication and access controls, password and credential management, encryption, network and infrastructure security, firewalls, endpoint protection, system monitoring, security logging, vulnerability management, backups and disaster-recovery procedures.

Ovitoz may also implement confidentiality obligations, role-based access restrictions, information-security training, incident-response procedures, data minimisation measures and retention and deletion controls.

Where operators process personal information on behalf of Ovitoz, Ovitoz will take reasonable steps to require those operators to establish and maintain appropriate security safeguards.

16.1 Data minimisation, retention and deletion controls

Ovitoz applies retention and deletion controls having regard to the purpose of processing, applicable legal requirements and its Privacy Policy. Special personal information, biometric information, health telemetry, location information, consent records and tracking data are subject to access and retention controls appropriate to their sensitivity and purpose.

16.2 Security compromise and incident response

Where there are reasonable grounds to believe that Personal Information has been accessed or acquired by an unauthorised person, Ovitoz will investigate and contain the incident, assess the affected information and risks, preserve appropriate evidence, implement corrective measures and review relevant controls. The Information Officer will oversee notifications to the Information Regulator and affected Data Subjects where and in the manner required by POPIA. Operators are required, where applicable, to notify Ovitoz of security compromises and cooperate with Ovitoz's incident-response process.

17. Procedure for requesting access to a record

A person who wishes to request access to a record held by Ovitoz must submit a request to the Information Officer using the form prescribed under PAIA.

The request should contain sufficient information to enable Ovitoz to identify the Requester and locate the requested record. The Requester should describe the record as accurately as reasonably possible and specify the manner in which access is required.

Where PAIA requires the Requester to demonstrate that access is necessary for the exercise or protection of a right, the request must identify that right and explain why the requested information is required.

If a request is made on behalf of another person, Ovitoz may require appropriate proof of authority to act on that person's behalf. Where the requested information contains personal or confidential information, Ovitoz may also require reasonable proof of identity before providing access.

Sensitive identification documents or other personal information submitted in connection with a request should be provided through a secure method specified by the Information Officer.

Ovitoz will consider requests within the periods prescribed by PAIA, subject to any extension permitted under the Act. The submission of a request does not automatically entitle a Requester to access the requested record.

18. Decision on a request

Ovitoz will notify the Requester of its decision on a PAIA request in accordance with the timeframes prescribed by law.

Where access is granted, Ovitoz will notify the Requester of the form in which access will be provided and of any applicable fees that must be paid before access is provided.

Where a request is refused, Ovitoz will provide the Requester with adequate reasons for the refusal to the extent required by PAIA and will inform the Requester of any remedies available.

19. Grounds for refusal of access

PAIA recognises that the right of access to information is not absolute. In certain circumstances, Ovitoz may be required or permitted to refuse access to a requested record.

Access may, for example, be refused where disclosure would result in an unreasonable disclosure of personal information concerning another person, reveal confidential commercial information or trade secrets, breach a duty of confidence owed to another person or prejudice the commercial interests of Ovitoz or a third party.

Access may also be refused where disclosure would compromise system security, endanger the safety of a person, disclose information protected by legal professional privilege or otherwise fall within a mandatory or discretionary ground for refusal under PAIA.

Where only part of a record is protected and the protected information can reasonably be separated from the remainder of the record, Ovitoz will consider whether the remainder may lawfully be disclosed.

20. Records that cannot be found or do not exist

Where Ovitoz has taken reasonable steps to locate a requested record but the record cannot be found or there are reasonable grounds to believe that the record does not exist, the Information Officer will notify the Requester in accordance with PAIA.

The notification will contain the information required by PAIA and may include an explanation of the steps taken to search for the record.

If the record is subsequently located, Ovitoz will consider the request for access in accordance with PAIA and the other provisions of this Manual.

21. Third-party information

A request for access may relate to information concerning a third party. In those circumstances, Ovitoz may be required to notify the affected third party and afford that person an opportunity to make representations regarding whether the information should be disclosed.

The existence of a third-party consultation process does not determine the outcome of the request. Ovitoz will ultimately determine the request in accordance with PAIA and any applicable grounds for mandatory or discretionary refusal.

22. Fees

Fees payable in connection with requests under PAIA will be determined in accordance with the applicable PAIA Regulations and prescribed fee schedule in force at the relevant time.

Where a fee is lawfully payable, Ovitoz may require payment of the prescribed request, reproduction or access fee before processing the request further or providing access to the relevant record.

Where permitted by PAIA, Ovitoz may also require payment of a deposit where the search for and preparation of the requested record is likely to require a substantial amount of time.

The Requester will be informed of any applicable fee and the manner in which payment should be made.

23. Rights of data subjects under POPIA

POPIA provides data subjects with rights relating to personal information held about them. Subject to the provisions and limitations of POPIA, a person may ask Ovitoz to confirm whether it holds personal information concerning that person and may request access to that information.

A data subject may also request that personal information be corrected where it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained. Where Ovitoz is no longer authorised to retain particular personal information, a data subject may request its deletion or destruction, subject to any legal obligation or lawful basis requiring Ovitoz to retain the information.

A data subject may object to certain processing where POPIA permits such an objection and may withdraw consent where processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing that occurred before the consent was withdrawn and may affect Ovitoz's ability to provide functionality that depends upon the relevant information.

Data subjects may also object to or unsubscribe from direct marketing and may lodge a complaint with the Information Regulator if they believe their rights under POPIA have been infringed.

A request for deletion is not an absolute right to immediate erasure in every circumstance. Ovitoz may retain information where retention is required or authorised by law, necessary for evidential, contractual, security or dispute purposes, or otherwise permitted under POPIA. Where deletion is appropriate, Ovitoz will delete, destroy or de-identify the information in a manner that prevents reconstruction in an intelligible form.

A Data Subject may withdraw consent to optional health synchronisation, background location processing, chatbot processing or optional cookie/pixel tracking through the relevant Platform, device, preference-centre or account controls where available, or by contacting the Information Officer. Withdrawal applies prospectively and does not invalidate processing lawfully undertaken before withdrawal.

24. POPIA requests and prescribed forms

A data subject wishing to exercise a right under POPIA should submit the relevant request to the Ovitoz Information Officer.

Where a prescribed form is required, the applicable form published under the POPIA Regulations should be used. This includes the prescribed form for objecting to the processing of personal information and the prescribed form for requesting correction or deletion of personal information or destruction or deletion of a record of personal information.

Ovitoz may require reasonable proof of identity before providing personal information or acting on a correction or deletion request. Where a person acts on behalf of a data subject, appropriate proof of authority may also be required.

25. Complaints to the Information Regulator

A Requester or data subject who is dissatisfied with the manner in which Ovitoz has dealt with a PAIA request or a matter concerning the processing of personal information may, where permitted under PAIA or POPIA, lodge a complaint with the Information Regulator.

Complaints should be submitted in accordance with the procedures and forms prescribed by the Information Regulator.

Information Regulator (South Africa)	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Email	enquiries@inforegulator.org.za

Toll-free	0800 017 160

26. Application to court

A person who is dissatisfied with a decision relating to access to a record may, subject to the requirements and time periods prescribed under PAIA, apply to a competent court for appropriate relief.

A person may also have additional remedies under POPIA or other applicable law depending on the circumstances giving rise to the complaint.

27. Retention of records

Ovitoz retains records for periods determined with reference to applicable legal requirements, contractual obligations and legitimate operational needs.

The appropriate retention period will depend upon the nature of the record and the purpose for which it was created. Certain corporate, accounting, tax, employment and contractual records may be subject to mandatory statutory retention periods, while other operational information may be retained for so long as reasonably necessary to administer the Rewards Programme, resolve disputes, protect Ovitoz's rights or meet legitimate business requirements.

Personal information will not be retained for longer than permitted under POPIA. Where Ovitoz is no longer authorised or required to retain personal information, it will be deleted, destroyed or de-identified in accordance with applicable law and Ovitoz's internal retention procedures.

28. Updating of this manual

Ovitoz will review this Manual periodically to ensure that it remains appropriate to the nature of its business and reflects applicable legal requirements.

The Manual may be amended where there are changes to PAIA, POPIA or their regulations, changes in guidance issued by the Information Regulator, material changes to Ovitoz's business model or technology, or material changes to the categories of records or personal information processed by Ovitoz.

The Information Officer is responsible for overseeing the maintenance and periodic review of this Manual.