Kwikot POPIA & PAIA Manual

Document control

Item	Detail
Document	Kwikot PAIA & POPIA Manual
Version	2.0
Information Officer	David Tloti
Prepared by	Johan van Pletzen, Head of IT
Approved by	Murray Graham Crow, Chief Executive Officer and Director
Approval date	2026/10/27
Next review	12 months after approval, or sooner if details change

Items in square brackets must be completed or confirmed before the manual is published.

1. Introduction and purpose

This manual explains how anyone can request records held by Kwikot, and how Kwikot processes personal information.

PAIA gives effect to the constitutional right of access to information (section 32 of the Constitution). Section 51 of PAIA requires every private body to publish a manual. POPIA requires Kwikot to process personal information lawfully and to tell data subjects how it does so.

This manual helps a requester to:

- know which categories of records Kwikot holds and which are available without a formal request;
- understand how to make a request, what it costs and how long it takes;
- contact the Information Officer and the Information Regulator;
- understand why Kwikot processes personal information, about whom, and how it is protected;
- exercise their rights as a data subject under POPIA.

Definitions

Term	Meaning
Kwikot / the Company	Kwikot Haier SA (Pty) Ltd, registration number 1971/005541/07
Data subject	The person to whom personal information relates
Information Officer	The head of the private body, or the person duly authorised by them, under PAIA s1 and POPIA s55

Term	Meaning
Personal information	As defined in section 1 of POPIA
Record	Any recorded information, in any form, in Kwikot's possession or control
Regulator	The Information Regulator established under section 39 of POPIA
Requester	Any person requesting access to a record

2. Company particulars and Information Officer

All PAIA requests and POPIA queries must be addressed to the Information Officer, **David Tloti**, at the details below.

2.1 Company details

Item	Detail
Registered name	Kwikot Haier SA (Pty) Ltd
Registration number	1971/005541/07
Enterprise type	Private company, registered 7 May 1971
Shareholding	Member of the Haier group
Business	Importation, sale, export, manufacture, servicing and repair of water-heating products (geysers, heat pumps, solar water heating and related products)
Registered office and head office	3 Aberdeen Road, Benoni Industrial Sites, Benoni, Gauteng, 1501
Postal address	3 Aberdeen Road, Benoni Industrial Sites, Benoni, Gauteng, 1501
Location of company records	1 Albany Road, Wanooka Place, Parktown, 2193
Switchboard	011 897 4600
Website	www.kwikot.com

2.2 Information Officer

Item	Detail
Name	David Tloti
Designation	Internal Corporate Legal Advisor – South Africa; duly authorised by

Item	Detail
	the CEO, Murray Crow, as Information Officer
Telephone	011 897 4600
Email	dpo@kwikot.com
Address	3 Aberdeen Road, Benoni, 1501
Regulator registration	2024-004148 (registered 22 May 2024; David Tloti appointed 8 May 2026)

2.3 Deputy Information Officer(s)

The deputies below are designated under PAIA s17 and POPIA s56 and registered with the Information Regulator.

Name	Appointed
Bongani Diale	15 May 2026
Johan (Diederick Johannes) van Pletzen	8 May 2026
Casie Haywood	24 May 2024
Lourens Enslin	24 May 2024
Silvia de Menezes	24 May 2024
Laurey Thomas	24 May 2024

Deputies can be reached through the Information Officer at dpo@kwikot.com.

2.4 Duties of the Information Officer

- Encourage compliance with the conditions for lawful processing in POPIA.
- Handle requests made under PAIA and POPIA.
- Work with the Regulator on investigations.
- Develop, implement and monitor the compliance framework, including a personal information impact assessment.
- Keep this manual current and available.
- Arrange internal awareness sessions on PAIA and POPIA.
- Submit Kwikot's PAIA annual report to the Regulator when required.

3. The Regulator's guide and contact details

The Information Regulator publishes the official guide on how to use PAIA and POPIA (PAIA s10). It is available in all official languages from the Regulator, and a copy may be inspected at Kwikot's head office during office hours.

The guide explains the objects of PAIA and POPIA, how to request records, the help available from Information Officers and the Regulator, the remedies available, and the prescribed fees and forms.

Item	Detail
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 · toll-free 0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	inforegulator.org.za

Sources: Regulator contact and members page, Regulator contact-us page (email addresses). Confirm these details before publishing; the Regulator has moved offices before.

4. Records available without a request, and under other laws

The records below may be obtained without a formal PAIA request. Records not listed must be requested under section 6 of this manual.

4.1 Automatically available (PAIA s52)

Record	How to obtain
Product brochures, catalogues and specifications	Website or sales offices
Warranty terms and service information	Website
Press releases and marketing material	Website
This manual and the privacy notice	Website and head office

4.2 Records kept under other legislation (PAIA s51(1)(b)(iii))

Kwikot keeps records in terms of the laws below, where applicable. Listing a law does not mean every record under it is available; access remains subject to PAIA.

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Customs and Excise Act 91 of 1964
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998

- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- National Building Regulations and Building Standards Act 103 of 1977
- National Environmental Management Act 107 of 1998
- Occupational Health and Safety Act 85 of 1993
- Skills Development Act 97 of 1998 and Skills Development Levies Act 9 of 1999
- Standards Act 8 of 2008 and the National Regulator for Compulsory Specifications Act 5 of 2008
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001 and Unemployment Insurance Contributions Act 4 of 2002
- Value-Added Tax Act 89 of 1991

[Legal/compliance to confirm the list against Kwikot's operations.]

5. Categories of records held

Kwikot holds the records below. Inclusion here does not mean access will be granted; each request is decided under PAIA's grounds for refusal.

Subject	Examples of records
Company secretarial	Memorandum of Incorporation, share register, board and shareholder minutes, CIPC filings
Finance and tax	Annual financial statements, management accounts, ledgers, tax returns, VAT, banking records, audit reports
Human resources	Employment contracts, personnel files, payroll, leave, disciplinary and grievance records, training, employment equity reports, medical surveillance
Health, safety and environment	OHS registers, incident reports, risk assessments, environmental permits and audits
Sales and customers	Customer accounts, credit applications, orders, invoices, delivery notes, correspondence
Warranty and service	Warranty registrations, claims, service-agent reports, complaints
Procurement and suppliers	Supplier contracts, vendor master data, purchase orders, BBBEE certificates
Production and quality	Bills of materials, specifications, quality and SABS/NRCS certification records, test results
Information technology	System and access logs, asset registers, IT policies, licence agreements, backup records

Subject	Examples of records
Legal	Contracts, litigation files, legal opinions, insurance policies and claims
Marketing	Campaign material, consents for direct marketing, website data
Security	Visitor registers, access-control records, CCTV footage

6. How to request access to a record

A requester completes PAIA Form 2 and sends it to the Information Officer, David Tloti; Kwikot decides within 30 days.

6.1 Procedure

1. Complete **Form 2: Request for Access to Record** (Regulation 7), available from the Regulator's PAIA forms page or from the Information Officer.
2. Identify the record clearly and state the form of access wanted (copy, inspection, electronic).
3. State the right the requester wants to exercise or protect, and why the record is needed for it (PAIA s53(2)(d)). This does not apply to a person requesting their own personal information.
4. If acting for someone else, attach proof of authority.
5. Email the form to dpo@kwikot.com, or deliver it to the Information Officer at head office, and pay the request fee, if applicable.

A requester who cannot read or write, or has a disability, may make the request orally. The Information Officer will reduce it to writing and give the requester a copy.

6.2 Fees

Fees are those prescribed in the PAIA Regulations (2021), Annexure B. Check the Regulator's fee structure for current amounts before paying.

- **Request fee** — R140, payable before the request is processed. No request fee applies to a person requesting their own personal information.
- **Access fee** — for search, preparation and reproduction (e.g. per A4 page, electronic media, postage), payable once access is granted.
- **Deposit** — if the search and preparation will take more than six hours, Kwikot may ask for a deposit of one third of the access fee.
- Records are released only once the fees are paid.

6.3 Timelines

- Kwikot decides within **30 days** of receiving a complete request.
- It may extend this once by up to **30 days** (PAIA s57), with written reasons.
- No decision in time is a deemed refusal (PAIA s58).
- The outcome is given on Form 3, with reasons if refused.

6.4 Grounds for refusal

Kwikot may or must refuse access on the grounds in Chapter 4 of Part 3 of PAIA, including:

- unreasonable disclosure of a third party's personal information (s63);
- a third party's trade secrets or confidential commercial information (s64);
- confidential information owed to a third party (s65);
- safety of individuals and protection of property (s66);
- records privileged from production in legal proceedings (s67);
- Kwikot's own trade secrets, or information that would harm its commercial position (s68);
- research information of Kwikot or a third party (s69).

A record must still be disclosed if it reveals a serious contravention of the law or an imminent risk to public safety or the environment, and the public interest clearly outweighs the harm (s70).

6.5 Third-party notification

If a request concerns a third party's information, Kwikot notifies that party within 21 days. The party has 21 days to make representations before Kwikot decides.

6.6 Remedies

PAIA provides no internal appeal against a private body's decision. A requester or third party who is dissatisfied may, within 180 days:

- lodge a complaint with the Information Regulator on Form 5 to PAIAComplaints@inforegulator.org.za; or
- apply to a court of competent jurisdiction for relief.

7. Processing of personal information (POPIA)

Kwikot processes personal information only for lawful business purposes, and only as much as it needs, in line with the eight conditions in Chapter 3 of POPIA.

7.1 Purposes of processing

- Recruiting, employing and managing staff, including payroll, benefits, and health and safety.
- Concluding and performing contracts with customers, suppliers and service providers.
- Processing orders, deliveries, invoicing and credit control.
- Registering warranties and handling service calls, claims and complaints.
- Complying with legal, tax, regulatory and reporting duties.
- Securing premises, people and systems, including access control and CCTV.
- Managing IT systems, user accounts and information security.
- Direct marketing, only with consent or to existing customers as POPIA s69 allows.
- Establishing, exercising or defending legal claims.

7.2 Data subjects and categories of information

Data subject	Categories of personal information

Data subject	Categories of personal information
Employees, job applicants, contractors	Name, ID number, contact details, banking and tax details, qualifications, employment history, performance and disciplinary records; special personal information (e.g. health, race for employment equity, biometrics for access control) where the law permits
Customers and trade partners (plumbers, merchants, contractors)	Names and contact details of contact persons, company details, account and credit information, order and payment history
End users and homeowners	Name, contact details, installation address, product serial numbers, warranty and service history
Suppliers and service providers	Company details, contact persons, banking details, BBBEE and tax information
Visitors	Name, ID or vehicle details, visit times, CCTV images
Website and app users	Contact details submitted on forms, cookies and usage data

7.3 Recipients

Kwikot may share personal information, only as needed, with:

- companies in the Haier group;
- service agents and installers handling warranty and service work;
- IT and cloud service providers (including Microsoft 365 and other hosted business systems);
- payroll, benefits, medical aid, pension and insurance providers;
- auditors, legal advisers and other professional advisers;
- banks, credit bureaux and debt collectors;
- logistics and courier companies;
- government and regulatory bodies (e.g. SARS, Department of Employment and Labour, NRCS) where the law requires.

Every operator processing personal information for Kwikot must sign a written agreement that requires security safeguards (POPIA s20–21).

7.4 Cross-border transfers

Personal information may be transferred outside South Africa, for example to the Haier group or to cloud data centres. Kwikot transfers it only where POPIA s72 allows: the recipient is bound by law, binding corporate rules or an agreement giving adequate protection, the data subject consents, or the transfer is needed to perform a contract.

Countries and systems involved, Haier group systems (China, Ireland, Europe, Unites State of America), Microsoft 365 data residency (Ireland).

7.5 Security measures

Kwikot applies appropriate technical and organisational measures (POPIA s19), including:

- identity and access management through Microsoft Entra ID, with multi-factor authentication and role-based access;
- centrally managed, Entra-joined devices with endpoint protection and disk encryption;
- encryption of data in transit and, where supported, at rest;
- firewalls, email filtering, patching and vulnerability management;
- backups and a tested recovery process;
- physical access control and CCTV at sites;
- confidentiality clauses in employment and operator contracts;
- staff awareness training on POPIA and information security;
- a security incident procedure.

7.6 Security compromises

If there are reasonable grounds to believe personal information has been accessed or acquired by an unauthorised person, Kwikot notifies the Regulator and the affected data subjects as soon as reasonably possible (POPIA s22). Notification to the Regulator is made on the prescribed form via the Regulator's eServices portal.

7.7 Retention

Records are kept only as long as needed for the purpose, or as long as the law requires, and then destroyed, deleted or de-identified (POPIA s14).

8. Data subject rights and complaints

Any data subject may exercise the rights below free of charge by contacting the Information Officer, David Tloti, at dpo@kwikot.com.

Right	How to exercise it
Know whether Kwikot holds their personal information, and get a description of it (POPIA s23)	Written request to the Information Officer, with proof of identity
Access a copy of their personal information (POPIA s23, PAIA)	PAIA Form 2; no request fee for one's own information
Correct, delete or destroy inaccurate, irrelevant, excessive, outdated or unlawfully held information (POPIA s24)	POPIA **Form 2**
Object to processing on reasonable grounds, or to direct marketing (POPIA s11(3))	POPIA **Form 1**

Right	How to exercise it
Withdraw consent	Written notice; this does not affect processing done before withdrawal
Complain to the Regulator (POPIA s74)	POPIA Form 5 to POPIAComplaints@inforegulator.org.za

POPIA forms are on the Regulator's POPIA forms page. Kwikot responds within a reasonable time and tells the data subject what action was taken.

Data subjects are encouraged to raise concerns with the Information Officer first, so Kwikot can try to resolve them.

9. Availability, updates and annexures

This manual is available free of charge on Kwikot's website and for inspection at the head office, 3 Aberdeen Road, Benoni, during office hours. A copy may also be provided to the Information Regulator on request (PAIA s51(3)).

The Information Officer reviews the manual at least once a year, and whenever company or contact details change.

Annexures

Form	Purpose	Source
PAIA Form 2	Request for access to a record	PAIA forms
PAIA Form 3	Outcome of request and fees payable	PAIA forms
PAIA Form 5	Complaint to the Regulator	PAIA forms
POPIA Form 1	Objection to processing	POPIA forms
POPIA Form 2	Correction or deletion of personal information	POPIA forms
POPIA Form 4	Consent for direct marketing	POPIA forms

Sign-off

	Name	Signature	Date
Chief Executive Officer	Murray Crow	Murray Crow (Oct 30, 2026 08:13:17 GMT+2)	30/10/202
Information Officer	David Tloti		23/10/202

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Final Audit Report 2026-10-30

Created:	2026-10-27
By:	Johan van Pletzen (johan.vp@kwikot.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA0qv9MZXHVmGYGWIlyBjOyprDG8dXDg7R

"Kwikot POPIA & PAIA Manual" History

Document created by Johan van Pletzen (johan.vp@kwikot.com)
2026-10-27 - 8:49:41 AM GMT

Document emailed to David Tloti (david.t@kwikot.com) for signature
2026-10-27 - 8:49:46 AM GMT

Document emailed to Murray Crow (murray@kwikot.com) for signature
2026-10-27 - 8:49:46 AM GMT

Email viewed by David Tloti (david.t@kwikot.com)
2026-10-29 - 4:51:36 AM GMT

Document e-signed by David Tloti (david.t@kwikot.com)
Signature Date: 2026-10-29 - 4:52:46 AM GMT - Time Source: server - Signature Appearance Selected: IMAGE

Email viewed by Murray Crow (murray@kwikot.com)
2026-10-30 - 6:12:09 AM GMT

Document e-signed by Murray Crow (murray@kwikot.com)
Signature Date: 2026-10-30 - 6:13:17 AM GMT - Time Source: server - Signature Appearance Selected: MOBILE_DRAW

Agreement completed.
2026-10-30 - 6:13:17 AM GMT