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BARGAIN BOOKS

Books, Magazines and Stationery CC, trading as Bargain Books
Registration number 1997/042497/23

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

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1 Definitions

Term	Definition
CEO	Chief Executive Officer
Client	Any natural or juristic person that received or receives services from the company
Complainant	Any person who lodges a complaint with the Information Regulator
Complaint	(a) A matter reported to the Information Regulator in terms of section 74(1) and (2) of the Act; (b) A complaint referred to in section 76(1)(e) and 92(1) of the Act; (c) A matter reported or referred to the Information Regulator in terms of other legislation that regulates the mandate of the Information Regulator
Conditions for Lawful Processing	The conditions for the lawful processing of personal information as fully set out in chapter 3 of POPI and in section 12 of this manual
Data Subject	The person to whom Personal Information relates
Day	A calendar day, unless the last day of a specified period happens to fall on a Sunday or public holiday, in which case it is calculated exclusive of that Sunday or public holiday (Interpretation Act, 1957 - Act No. 33 of 1957)
DIO	Deputy Information Officer
Information Officer/IO	The individual who is identified herein and legally appointed to ensure compliance with POPIA and PAIA
Manual	This manual
Minister	Minister of Justice and Correctional Services
Office Hours	(a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays); (b) For designated offices: Hours during which the offices operate
PAIA	The Promotion of Access to Information Act, No. 2 of 2000
Personal Information	Information relating to an identifiable living person, or an identifiable existing juristic person, including but not limited to race, gender, contact info, biometrics, correspondence, opinions, and identifiers
Personnel	Any person who works for or provides services to or on behalf of the company and receives or is entitled to receive remuneration, including permanent, temporary and part-time staff, directors, and contractors
POPI/POPIA	The Protection of Personal Information Act, No. 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI

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Term	Definition
Private Body	(a) A natural person conducting business; (b) A business partnership; (c) A juristic person not being a public body
Processing	Any operation or activity concerning personal information, including collection, storage, dissemination, or destruction
Regulator	Information Regulator established in terms of POPIA
Republic	Republic of South Africa
Signature	Any legally accepted form of signature, including electronic signature where applicable
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2 Purpose of the PAIA Manual

This PAIA Manual is useful for the public to:

- 2.1 Check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 2.2 Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- 2.3 Know the description of the records of the body which are available in accordance with any other legislation.
- 2.4 Access all the relevant contact details of the IO and DIO who will assist the public with the records that they intend to access.
- 2.5 Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.
- 2.6 Know if the body will process personal information, the purpose of processing of personal information, and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.7 Know the recipients or categories of recipients to whom the personal information may be supplied.
- 2.8 Know if the body has planned to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.
- 2.9 Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

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3 Key Contact Details for Access to Information of Bargain Books

3.1 Information Officer

Name	John O'Sullivan
Contact number	021 706 1461
Email address	john@bargainbooks.co.za

3.2 Deputy Information Officer

Name	Stacy Staudt
Contact number	021 706 1461
Email address	stacy@bargainbooks.co.za

3.3 General contacts for access to information

Email address	stacy@bargainbooks.co.za
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3.4 National or head office

Postal address	10 Mymoena Crescent, Athlone Industrial Park, Athlone, Cape Town, 7764
Physical address	Same as above
Contact number	021 706 1461
Email	stacy@bargainbooks.co.za
Website	https://bargainbooks.co.za

4 Guide on how to use PAIA and how to Obtain Access to the Guide

- 4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised guide on how to use PAIA ("guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2 The guide is available in each of the official languages and in braille.
- 4.3 The aforesaid guide contains the description of:
 - 4.3.1 The objects of PAIA and POPIA;
 - 4.3.2 The postal and street address, phone and fax number and, if available, email address of:
 - 4.3.2.1 The IO of every public body, and
 - 4.3.2.2 Every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA¹;

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- 4.3.3 The manner and form of a request for:
 - 4.3.3.1 Access to a record of a public body contemplated in section 11².
 - 4.3.3.2 Access to a record of a private body contemplated in section 50³.
 - 4.3.3.3 An internal appeal.
 - 4.3.3.4 A complaint to the Regulator.
 - 4.3.3.5 An application with a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.
- 4.3.4 The provisions of sections 14⁴ and 51⁵ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.5 The provisions of sections 15⁶ and 52⁷ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.6 The notices issued in terms of sections 22⁸ and 54⁹ regarding fees to be paid in relation to requests for access;
- 4.3.7 The regulations made in terms of section 92¹⁰;
- 4.3.8 The assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.9 The assistance available from the Regulator in terms of PAIA and POPIA; and
- 4.3.10 All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging.
- 4.4 Members of the public can inspect or make copies of the guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5 The guide can also be obtained:
 - 4.5.1 Upon request to the IO.
 - 4.5.2 From the website of the Regulator (<https://inforegulator.org.za/>).
- 4.6 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:
 - 4.6.1 English.
 - 4.6.2 Afrikaans.
 - 4.6.3 Zulu.

1 Section 56(a) of POPIA – Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA

2 Section 11 of PAIA – A requester must be given access to a record of a public body if the requester complies with all the procedural requirements in PAIA relating to a request for access to that record, and if access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

3 Section 50 of PAIA – A requester must be given access to any record of a private body if: (a) that record is required for the exercise or protection of any rights; (b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and (c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

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4 Section 14 of PAIA – The Information Officer of a public body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

5 Section 51 of PAIA – The Information Officer of a private body must update and publish the manual referred to in subsection (1) at intervals of not more than 12 months.

6 Section 15 of PAIA – The Information Officer of a public body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

7 Section 52 of PAIA – The head of a private body must update and publish any notice issued under subsection (2) at intervals of not more than 12 months.

8 Section 22 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

9 Section 54 of PAIA – If access to a record is granted, the notice must state the access fee (if any) required to be paid by the requester.

10 Section 92(11) of PAIA – The Information Regulator must update and publish the guide referred to in subsection (1) at intervals of not more than two years.

5 Guide of Information Regulator

5.1 A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.

5.2 The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.

5.3 Should you wish to access the guide, you may request a copy from the IO by contacting him/her using the details specified above.

5.4 You may also inspect the guide at the company's offices during ordinary working hours.

5.5 You may also request a copy of the guide from the Information Regulator at the following details:

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Contact number	010 023 5200 (toll-free 0800 017 160)
Website	www.inforegulator.org.za
Email	enquiries@inforegulator.org.za

6 Latest Notices in terms of Section 52(2) of PAIA

At this stage, no notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

7 Availability of Certain Records in terms of PAIA

7.1 Categories of records of Bargain Books which are available without a person having to request access:

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Category of Records	Types of the Record	Available on Website	Available on Request
PAIA Manual	Company's current PAIA Manual	X	X
Company overview	Company profile, business activities, contact details	X	X
Policies (public-facing)	Privacy policy, website cookies policy	X	X
Legal disclosures	Consumer protection notices, disclaimers, terms and conditions	X	X
News and announcements	Company newsletters, media releases, service updates	X	X
Public marketing materials	Brochures, product offerings, public service descriptions	X	X
POPIA and PAIA awareness training certificates	Company's attendance registers on training of POPIA and PAIA	X	X
Public tender or supplier information (if applicable)	Supplier registration forms, B-BBEE (Broad-Based Black Economic Empowerment) certificate (public documents)		X
Contact information for IO	Name, designation, email address, contact number	X	X

7.2 Description of the records/subjects of Bargain Books which are available in accordance with any other legislation:

Category of Records	Applicable Legislation	Department/ Subject Area
Company registration documents, Memorandum of Incorporation, board minutes, company policies	Companies Act, 71 of 2008; PAIA, 2 of 2000	HR/ Accounts
Supplier and publisher contracts, purchase orders, distribution agreements, import/export documentation	Companies Act, 71 of 2008; Consumer Protection Act, 68 of 2008; Customs & Excise Act, 91 of 1964	Accounts
Product catalogues, ISBN details, publisher metadata, returns and damaged stock reports	Consumer Protection Act, 68 of 2008; Copyright Act, 98 of 1978	Marketing and Accounts

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Category of Records	Applicable Legislation	Department/ Subject Area
Customer records: invoices, receipts, order history, returns, refunds, gift voucher/redemption details	Consumer Protection Act, 68 of 2008; POPIA, 4 of 2013	Retail Operations / IT
Store inventory and stock control: warehousing records, distribution to stores, damaged goods logs	Companies Act, 71 of 2008; Consumer Protection Act, 68 of 2008	IT/ Accounts
Store operations: point-of-sale records, daily cash-up reports, till reconciliations, delivery notes	Consumer Protection Act, 68 of 2008; Income Tax Act, 58 of 1962	Retail Operations / Accounts
Employee records: contracts, payroll, tax, disciplinary records, training (customer service, cash handling, safety), ID and contact details	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; POPIA, 4 of 2013	HR
Health & Safety records: incident logs, store safety inspections, compliance certificates	Occupational Health and Safety Act, 85 of 1993; Compensation for Occupational Injuries and Diseases Act, 130 of 1993	HR/ Occupational Health and Safety
Marketing & promotions: adverts, flyers, catalogues, social media campaigns, loyalty programmes, email/SMS subscriber lists	Consumer Protection Act, 68 of 2008; Electronic Communications and Transactions Act, 25 of 2002; POPIA, 4 of 2013	Marketing
IT and digital systems: website usage logs, online shopping data, CRM databases, user accounts, cookies/consents, backups	Electronic Communications and Transactions Act, 25 of 2002; POPIA, 4 of 2013	IT & Data
Financial & accounting: bank statements, invoices, receipts, reconciliations, tax filings, VAT returns, audit reports	Income Tax Act, 58 of 1962; Value-Added Tax Act, 89 of 1991; Companies Act, 71 of 2008	Accounts/ Finance
Customer feedback and complaints: satisfaction surveys, dispute resolution records	Consumer Protection Act, 68 of 2008; POPIA, 4 of 2013	Marketing/ Customer Service
Loyalty and gift card programmes: membership details, card balances, redemption records, transaction history	Consumer Protection Act, 68 of 2008; POPIA, 4 of 2013; ECT Act, 25 of 2002	Marketing / Customer Service

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Category of Records	Applicable Legislation	Department/ Subject Area
Data subject consent forms, privacy notices, PAIA Manual, operator agreements, processing activity records	Protection of Personal Information Act, 4 of 2013	HR
PAIA Manual, access request logs, training records	Promotion of Access to Information Act, 2 of 2000	HR
Electronic communications policies, e-signature consents, website terms and conditions	Electronic Communications and Transactions Act, 25 of 2002	Information Technology (IT)
Document retention and disposal schedules, archive logs	National Archives and Records Service Act, 43 of 1996	HR

- 7.3 The company holds and/or processes the following records for the purposes of PAIA and POPIA:
- 7.3.1 PAIA: PAIA Manual; PAIA guides; PAIA records; PAIA submission records; awareness training.
 - 7.3.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.
 - 7.3.3 Further information which may be made available upon request.
- 7.4 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

8 Request Process

- 8.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.
- 8.2 The requester must complete Form 02 of the PAIA Forms (Request for Access to Record), linked under Applicable Forms at the end of this manual, and submit it to the IO at the details specified herein.
- 8.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.
- 8.4 The prescribed form must be completed with enough particularity to enable the IO to determine:
 - 8.4.1 The record(s) requested;
 - 8.4.2 The identity of the requestor;
 - 8.4.3 What form of access is required; and
 - 8.4.4 The postal address or fax number of the requestor.

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- 8.5 The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.
- 8.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the IO that the request be dealt with sooner.
- 8.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held at another office of the company and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requestor in writing should an extension be necessary.
- 8.8 The IO must communicate a response to the request for access using Form 03 of PAIA Forms (Outcome of Request and of Fees Payable) herein. This communication shall inform the requestor of:
- 8.8.1 The decision; and
- 8.8.2 Fees payable.
- 8.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.
- 8.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the IO for assistance.
- 8.11 An oral request can be made to the IO should the requestor be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requestor and provide a copy of the form to the requestor.
- 8.12 Form 2 of POPIA Forms (Request for Correction or Deletion) herein, is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data.
- 8.13 Form 3 of POPIA Forms (Application for the Issue of a Code of Conduct) herein is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing.
- 8.14 Form 4 of POPIA Forms (Request for Consent – Direct Marketing) herein enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to.
- 8.15 Form 5 of POPIA Forms (Complaint Regarding Interference with Personal Information) herein allows a data subject or complainant to submit a complaint to the IR concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations.

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9 Grounds for Refusal

The following are grounds upon which the company may, subject to the exceptions in chapter 4 of PAIA, refuse a request for access in accordance with chapter 4 of PAIA:

- 9.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.
- 9.2 Mandatory protection of the commercial information of a third party, if the records contain:
 - 9.2.1 Trade secrets of that third party;
 - 9.2.2 Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 9.2.3 Information disclosed in confidence by a third party to the company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
- 9.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 9.4 Mandatory protection of the safety of individuals and the protection of property.
- 9.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.
- 9.6 Protection of the commercial information of the company, which may include:
 - 9.6.1 Trade secrets;
 - 9.6.2 Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the company;
 - 9.6.3 Information which, if disclosed, could put the company at a disadvantage in contractual or other negotiations or prejudice the company in commercial competition; and/or
 - 9.6.4 Computer programs which are owned by the company, and which are protected by copyright and intellectual property laws.
- 9.7 Research information of the company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.
- 9.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10 Remedies Should a Request be Refused

- 10.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.
- 10.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

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11 Fees

The following fees shall be payable upon request by a requestor:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Base/starting rate to search for and prepare the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Rate to search for and prepare the record for disclosure	R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)

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Details	Fee
Postage, email or any other electronic transfer	Actual expense, if any

12 Processing of Personal Information

12.1 Purpose of processing personal information:

- 12.1.1 To manage customer relationships, including processing in-store and online purchases, deliveries, refunds, loyalty and gift card programmes, complaints, and after-sales service.
- 12.1.2 To administer employee matters such as recruitment, payroll, training, performance management, and health and safety compliance.
- 12.1.3 To comply with legal, tax, regulatory, and contractual obligations, including Consumer Protection Act requirements, VAT and tax reporting, and audit compliance.

12.2 Description of the categories of data subjects and of the information or categories of information relating thereto:

Categories of Data Subjects	Personal Information that may be Processed
Customers/clients	Name, identity or registration number (where applicable), contact details (address, phone, email), purchase and order history, delivery information, returns and refund records, bank and payment details, loyalty/gift card balances, communication and consent records
Service providers/Suppliers	Name, company registration and VAT numbers, business contact details, contractual information, compliance certificates, trade secrets where relevant, and banking details
Employees	Name, address, contact details, identity/passport number, employment history, payroll and tax information, qualifications and training records, disciplinary records, race and gender (for EE reporting), health and safety compliance
Job applicants	Name, contact details, CV and cover letter, work history, qualifications, the role and branch applied for, and recruitment notes
Contractors / Logistics Partners	Name, contact details, contractual details, service records, delivery and logistics compliance documentation
Website / IT System Users (including newsletter subscribers, competition entrants and users of the online support chat)	Name, contact details, login credentials, IP addresses, device identifiers, online purchase history, usage logs, cookie data, consent preferences, competition entries, and the content of messages sent through the website and its support chat

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13 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be Supplied
Customer details (name, contact details, purchase history, payment information)	Logistics and courier partners, payment processors, loyalty/gift card programme providers, debt collection agencies (where necessary)
Employee information (identity number, payroll and tax details, qualifications, health and safety records)	South African Revenue Service (SARS), Department of Labour, South African Qualifications Authority (SAQA), training and accreditation bodies, medical aid and pension administrators, medical aid providers, health insurance providers, pension and retirement annuity administrators
Supplier and service provider information (registration numbers, VAT details, contracts, compliance records, banking details)	Financial institutions (for payments), auditors, customs/trade regulators where applicable
Contractor and logistics partner information (contact details, service records, compliance documentation)	Courier companies, warehousing partners, occupational health and safety regulators
Credit and payment history (customers or suppliers under credit terms)	Credit bureaus, banks, financial institutions, and debt collection agencies
Security and compliance records (CCTV footage, access logs, incident reports)	Security service providers, insurance companies, and law enforcement where disclosure is legally required, internal departments such as Human Resources and Operations for investigation purposes
Website and online-service information (accounts, contact form and support-chat messages, newsletter and competition entries, usage, device and cookie data)	Website hosting and cloud database providers, email delivery services, website analytics and error-monitoring providers, mapping services, and an AI service provider that powers the online support chat

14 Planned Transborder Flows of Personal Information

Certain personal information may be transferred or stored outside of the Republic of South Africa in the following instances:

- **Cloud-based storage and IT systems:** Customer, supplier, and employee information may be stored on secure cloud platforms (e.g., Microsoft, Google, CRM/e-commerce systems) hosted in the European Union or United States. This includes payroll systems, Employee Self-Service (ESS) platforms (used for leave applications and employee administration), and cloud-based document storage systems (e.g., OneDrive).

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- **Internal cloud access across operations:** Organisational documents, including operational and employee-related records, may be stored on cloud-based platforms and accessed by authorised stores nationally. Access is restricted to company-managed devices and is controlled and granted by the IT department in line with internal access control policies.
 - **International service providers:** Limited personal information may be processed by global payment gateways, logistics partners, or IT service providers for secure transactions, order fulfilment, and system maintenance.
 - **Website and online services:** The website (bargainbooks.co.za) runs on international cloud hosting and database platforms. Messages typed into the online support chat are processed by an AI service provider to generate replies. Website analytics (Plausible, Google Analytics and Contentsquare), error monitoring (Sentry), email delivery (Resend) and map services (Google Maps) may process personal information in the European Union or the United States. Analytics cookies and session insights are used only with the visitor's consent.
 - **Digital marketing and communications platforms:** Customer details such as email addresses and subscription preferences may be stored on international platforms used for newsletters, promotions, and loyalty programme management.
 - **Regulatory disclosures:** Personal information such as employment contracts, payroll-related records, and timesheets may be shared with regulatory authorities (e.g., Department of Labour inspectors) during site visits or compliance assessments, in accordance with applicable laws.
- 14.1 General description of information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information:
- 14.1.1 **Encryption and secure communication protocols** – all sensitive personal and payment data is encrypted both in transit (SSL/TLS) and at rest on secure servers.
 - 14.1.2 **Access control and authentication** – strict role-based access rights and strong password management policies are enforced.
 - 14.1.3 **Cybersecurity and monitoring safeguards** – firewalls, anti-virus and anti-malware solutions, intrusion detection, and regular vulnerability testing are implemented to prevent unauthorised access.

15 Availability of the Manual

- 15.1 A copy of the manual is available:
- 15.1.1 On <https://bargainbooks.co.za/paia>, or at any head office of Bargain Books for public inspection during normal business hours;
 - 15.1.2 To any person upon request and upon the payment of a reasonable prescribed fee; and
 - 15.1.3 To the Information Regulator upon request.
- 15.2 A fee for a copy of the manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

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16 Objection to the Processing of Personal Information by a Data Subject

- 16.1 A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or section 11(3)(b) of the Act, must submit the objection to a responsible party at any time during office hours of a responsible party and free of charge.
- 16.2 A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to Form 1 of POPIA Forms herein, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11(3)(a) of the Act.
- 16.3 A responsible party must, when collecting personal information of a data subject, notify the data subject, in terms of section 18(1)(h)(iv) of the Act, of their right to object, as referred to in section 11(3) of the Act.
- 16.4 If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and upon request, be made available to the data subject in any manner, including the transcription thereof.

17 Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

- 17.1 A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.
- 17.2 A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.
- 17.3 A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.
- 17.4 A request for correction to or deletion of personal information, as referred to in sub-regulation 12.11.2 or a request for the destruction or deletion of a record of personal information, as referred to in sub-regulation 12.11.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms herein free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.
- 17.5 A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which shall be free of charge.
- 17.6 A responsible party must, within 30 (thirty) days of receipt of the outcome of the request referred to in sub-regulation 12.11.2 or 12.11.3, notify a data subject, in writing, of the action taken as a result of the request

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18 Updating of the Manual

The head of Bargain Books will review and update this manual at intervals of not more than 12 months.

Name of IO	John O'Sullivan
Title of the head of the body	Owner

Applicable Forms

The forms are published by the Information Regulator and can be downloaded from these links.

PAIA Forms

- [Form 01: Request for a Copy of the Guide from an Information Officer \[Regulation 3\]](#)
- [Form 02: Request for Access to Record \[Regulation 7\]](#)
- [Form 03: Outcome of Request and of Fees Payable \[Regulation 8\]](#)
- [Form 05: Complaint Form \[Regulation 10\]](#)
- [Form 13: PAIA Request for Compliance Assessment Form \[Regulation 14\(1\)\]](#)

POPIA Forms

- [Form 1: Objection to the Processing of Personal Information](#)
- [Form 2: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information](#)
- [Form 3: Application for the Issue of a Code of Conduct](#)
- [Form 4: Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing](#)
- [Form 5: Complaint Regarding Interference with the Protection of Personal Information / Complaint Regarding Determination of an Adjudicator](#)

Version History

Version	Date	Changes
4.1	27/09/2026	Correction. Gives POPIA Form 2 and Form 5 their titles as the Information Regulator publishes them (Applicable Forms). No other change.
4.0	23/09/2026	Annual update. Names the legal entity. Updates the Deputy Information Officer (Stacy Staudt) and the Information Regulator's contact details. Adds job applicants, newsletter subscribers, competition entrants and support-chat users (12.2), website and online-service recipients (13) and website transborder flows (14). Removes the multi-factor authentication claim (14.1.2). Corrects the objection form to Form 1 (16.2). Shows legal disclosures as available on the website (7.1) and links the forms.
3.0	18/09/2025	Prepared on a Labournet template.