

PROMOTION OF ACCESS TO INFORMATION MANUAL FOR  
BEAM SUNTORY SOUTH AFRICA PROPRIETARY LIMITED

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## 1. Introduction and Definitions

This manual has been compiled in accordance with the requirements of the Promotion of Access to Information Act 2 of 2000 (**PAIA**) and the Protection of Personal Information Act 4 of 2013 (**POPIA**) in respect of Beam Suntory South Africa Proprietary Limited (**Beam Suntory**).

Beam Suntory is a private body as defined in section 1 of PAIA, and this manual contains the information specified in section 51 of PAIA, which is applicable to such a private body. This information is as follows:

- the contact details of the Information Officer of Beam Suntory (section 51(1)(a)(i) of PAIA);
- a description of the guide referred to in section 10 of PAIA (section 51(1)(b)(i) of PAIA);
- a description of the records of Beam Suntory which are available without a requester having to request access in terms of PAIA (section 51(1)(b)(ii));
- a description of the records of Beam Suntory which are available in terms of any legislation other than PAIA (section 51(1)(b)(iii) of PAIA); and
- a description of the subjects on which Beam Suntory holds records and the categories of records held on each subject in sufficient detail to facilitate a request for access to a record (section 51(1)(b)(iv) of PAIA).

Beam Suntory is a responsible party as defined in section 1 of POPIA and this manual contains the information stipulated in section 51(1)(c) of PAIA. This information is as follows:

- the purpose of the Processing (section 51(1)(c)(i) of PAIA);
- a description of the categories of Data Subjects and Personal Information Processed by Beam Suntory in relation to these Data Subjects (section 51(1)(c)(ii) of PAIA);
- a description of the categories of recipients to whom that Personal Information is provided (section 51(1)(c)(iii) of PAIA);
- actual and/or planned instances when Personal Information held by Beam Suntory may be transferred outside of South Africa (section 51(1)(c)(iv) of PAIA); and
- a description of the information security measures implemented by Beam Suntory to ensure the confidentiality, integrity and availability of the Personal Information which is to be or is being Processed (section 51(1)(c)(iv) of PAIA).

The manual will be updated at least every twelve months or at such intervals as may be necessary in accordance with the requirements of section 51(2) of PAIA.

The manual facilitates requests for access to records of Beam Suntory as provided for in sections 53 and 54 of PAIA and sets out how to access Personal Information held by Beam Suntory in terms of sections 23 and 25 of POPIA.

In this manual, the following words bear the meaning set out below:

<b>Beam Suntory</b>	means Beam Suntory South Africa Proprietary Limited (registration number: 2009/016804/07), a company registered in South Africa in accordance with the Companies Act 71 of 2008, with its registered place of business at Letterstedt House, 4 <sup>th</sup> Floor, Newlands on Main 178 Campground Road, Newlands, Western Cape, 7700;
<b>Data Subject</b>	means the person to whom Personal Information relates, as defined in section 1 of POPIA. In the context of Beam Suntory, this primarily but without limitation means clients / customers, employees and Operators / suppliers, other persons and third parties;
<b>Employee</b>	means any person who works for or provides services to or on behalf of Beam Suntory, and receives or is entitled to receive remuneration;

<b>Guide</b>	means the guide compiled by the SAHRC, and updated and made available by the Information Regulator in terms of section 10 of PAIA;
<b>Information Officer</b>	means Ms Manu Bal, who has been duly authorised and designated to act as the Information Officer by the Head of Beam Suntory, currently Ms Geraldine Anderson, and who is registered with the Information Regulator in terms of section 55(2) of POPIA;
<b>Information Regulator</b>	means the regulatory body established in terms of section 39 of POPIA;
<b>Manual</b>	means this manual which is published in accordance with section 51 of PAIA and " <b>this manual</b> " shall have the same meaning;
<b>Minister</b>	means the Cabinet member responsible for the administration of justice, presently the Minister of Justice and Correctional Services;
<b>Operator</b>	means a person who Processes Personal Information for Beam Suntory in terms of a contract or mandate, without coming under the direct authority of Beam Suntory, as provided for in section 1 of POPIA, and Operators has a corresponding meaning;
<b>Personal Information</b>	has the meaning given in section 1 of POPIA, being personal information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: <ul style="list-style-type: none"> <li>(a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the persons;</li> <li>(b) information relating to the education or the medical, financial, criminal or employment history of the person;</li> <li>(c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</li> <li>(d) biometric information of the person;</li> <li>(e) personal opinions, views or preferences of the person;</li> <li>(f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;</li> <li>(g) views or opinions of another individual about the persons; and</li> <li>(h) the name of the person if it appears with other Personal Information relating to the person, or if the disclosure of the name itself would reveal information about the person;</li> </ul>
<b>Processing</b>	has the meaning given in section 1 of POPIA and includes any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including – <ul style="list-style-type: none"> <li>a) collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;</li> <li>b) dissemination by means of transmission, distribution or making available in any other form; or</li> <li>c) merging, linking, as well as restriction, degradation, erasure or destruction of information;</li> </ul>

and **Process** and **Processed** have corresponding meanings;

<b>PAIA Regulations</b>	means the Regulations relating to the Promotion of Access to Information, 2021;
<b>Requester</b>	means any person or entity requesting access in terms of PAIA to a record that is under the control of Beam Suntory or any Data Subject requesting details of any Personal Information relating to that Data Subject or a copy of the personal information in terms of POPIA;
<b>SAHRC</b>	means the South African Human Rights Commission;
<b>Special Personal Information</b>	has the meaning given in section 1 of POPIA and includes any Personal Information of a Data Subject, concerning – <ul style="list-style-type: none"> <li>(a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of the Data Subject; or</li> <li>(b) the criminal behaviour of the Data Subject to the extent that such information relates to – <ul style="list-style-type: none"> <li>i. the alleged commission by the Data Subject of any offence; or</li> <li>ii. any proceedings in respect of any offence allegedly committed by the Data Subject or the disposal of such proceedings</li> </ul> </li> </ul>

2. **Contact details (section 51(1)(a)(i) of PAIA)**

Requests for access to records or Personal Information in terms of either PAIA or POPIA should be addressed to the Information Officer using the following contact details:

**Physical address:**

Letterstedt House,  
4<sup>th</sup> Floor,  
Newlands on Main 178 Campground Road,  
Newlands,  
Western Cape,  
7700

**Postal address:**

P.O. Box 28  
Rondebosch  
Cape Town  
Western Cape  
7701

Telephone:

Email: [Manu.Bal@BeamSuntory.com](mailto:Manu.Bal@BeamSuntory.com)

3. **Section 10 Guide on how to use PAIA (section 51(1)(b)(i) of PAIA)**

The Information Regulator must, in terms of section 10 of PAIA, update and make available the Guide on how to use PAIA to assist persons wishing to exercise any rights in terms of PAIA.

A request for the Guide can made to the Information Regulator in the prescribed form (Form 1 of Annexure A). A copy of the form is attached as **Annexure B** to this manual. Any person wishing to obtain the Guide may either access it through the website of the Information Regulator at [www.justice.gov.za/inforeg/docs.html](http://www.justice.gov.za/inforeg/docs.html) or should contact:

## The Information Regulator

### Postal address:

P.O. Box 31533  
Braamfontein  
Johannesburg  
2017

Telephone: (012) 406 4818  
Fax: (086) 500 3351  
Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

Alternatively, members of the public can inspect or make copies of the Guide from the offices of the Information Regulator, at no fee, during normal working hours (regulation 2(3) of the PAIA Regulations).

The Information Officer has a copy of the Guide available in at least two of the official languages in South Africa at its address available for inspection, at no fee, during normal working hours (regulation 3(3) of the PAIA Regulations).

The Information Officer must make available the Guide, upon request in the prescribed form (Form 1 of Annexure A), the number of copies of the Guide requested (regulation 3(2) of the PAIA Regulations). A copy of the form is attached as **Annexure B** to this manual.

#### 4. Records available in terms of any other legislation (section 51(1)(b)(iii) of PAIA)

Certain records held by are available in terms of legislation other than PAIA. The specific records which are available in terms of such legislation are set out therein and these records may in certain instances only be accessed by the persons specified in the relevant legislation. The legislation includes, amongst others:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Medical Schemes Act 131 of 1998
- Occupational Health and Safety Act 85 of 1993
- Pension Funds Act 24 of 1956
- 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
- Value Added Tax Act 89 of 1991

#### 5. Description of the subjects on which Beam Suntory holds records and the categories of records held on each subject (section 51(1)(b)(iv) of PAIA)

The following is a list of the subjects on which Beam Suntory holds records and the broad categories into which these records fall. The procedure in terms of which such records may be requested from Beam Suntory is set out in Section 7 of this manual. The records listed below will not in all instances be provided to a requester who requests them in terms of PAIA. The requester must show that he or she has the right in terms of PAIA to be given access to the records in question.

Categories of records	Description of records held
<b><u>Administration</u></b>	<ul style="list-style-type: none"> <li>• Shareholder records</li> <li>• Share register</li> <li>• Minutes of meetings of shareholder meetings</li> <li>• Directors' records</li> <li>• Minutes of board meetings</li> <li>• Records relating to the incorporation of Beam Suntory</li> </ul>
<b><u>Management</u></b>	<ul style="list-style-type: none"> <li>• Minutes of meetings of committees and sub-committees</li> <li>• Minutes of meetings of Executive Committee</li> <li>• Internal correspondence</li> <li>• Resolutions of the directors of Beam Suntory</li> </ul>
<b><u>Finance</u></b>	<ul style="list-style-type: none"> <li>• Accounting records</li> <li>• Tax records</li> <li>• Debtors' records</li> <li>• Creditors' records</li> <li>• Insurance records</li> <li>• Auditors' reports</li> <li>• Interim and annual financial statements</li> <li>• Bank statements and other banking records for business and trust accounts</li> <li>• Invoices issued in respect of debtors and billing information</li> <li>• Records regarding Beam Suntory's financial commitments</li> </ul>
<b><u>Human Resources</u></b>	<ul style="list-style-type: none"> <li>• List of employees</li> <li>• Statistics regarding employees</li> <li>• Employment contracts</li> <li>• Conditions of employment</li> <li>• Curriculum vitae of employees, including qualifications</li> <li>• Information relating to prospective employees, including their curriculum vitae</li> <li>• Personnel records including personal details, disciplinary records, performance, and internal evaluation records</li> <li>• Employee tax information</li> <li>• Records of Unemployment Insurance Fund contributions</li> <li>• Records regarding group life assurance and disability income protection</li> <li>• Pension fund records</li> <li>• Payroll records</li> <li>• Health and safety records</li> <li>• Workplace skills plans</li> <li>• Codes of conduct</li> <li>• Disciplinary code and procedure</li> <li>• Grievance procedure</li> <li>• Appeal procedure</li> <li>• Remuneration policy</li> <li>• Internal policies and procedures</li> <li>• Training schedules and material</li> <li>• Correspondence relating to personnel</li> </ul>
<b><u>Suppliers</u></b>	<ul style="list-style-type: none"> <li>• Supplier lists and details of suppliers</li> <li>• Agreements with suppliers</li> </ul>
<b><u>Information Technology</u></b>	<ul style="list-style-type: none"> <li>• Computer software</li> <li>• Support and maintenance agreements</li> <li>• Records regarding computer systems and programmes</li> </ul>

Categories of records	Description of records held
<u>Property</u>	<ul style="list-style-type: none"> <li>• Asset registers</li> <li>• Lease agreements in respect of immovable property</li> <li>• Records regarding insurance in respect of movable property</li> <li>• Records regarding insurance in respect of immovable property</li> </ul>
<u>Miscellaneous</u>	<ul style="list-style-type: none"> <li>• Internal correspondence</li> <li>• Firm publications</li> <li>• Legal correspondence</li> </ul>

6. **Processing of Personal Information by Beam Suntory (section 51(1)(c) of PAIA)**

Details about the Processing of Personal Information undertaken by Beam Suntory are set out in **Annexure A**.

7. **Categories of records which are available without request (section 51(1)(b)(ii) of PAIA)**

No notices relating to Beam Suntory have been published by the Minister in terms of section 52(2) of PAIA.

Certain records are available without needing to be requested in terms of the request procedures set out in PAIA and detailed in Section 7 of this manual. This information may be inspected, collected, purchased, or copied (at the prescribed fee for reproduction) at the offices of Beam Suntory. Certain information is also available on Beam Suntory's website [www.beamsuntory.com](http://www.beamsuntory.com). The records include:

- Marketing brochures
- Contact information
- Corporate Responsibility
- Product information
- Career information
- Media releases

8. **Request procedure in terms of PAIA (section 53 of PAIA)**

A request for access to records held by Beam Suntory in terms of section 50 of PAIA must be made in the prescribed form (Form 2 of Annexure A) the **PAIA Regulations** (section 53(1) of PAIA). A copy of the form is attached as **Annexure C** to this manual. The request must be made to Beam Suntory at the address, or email address, specified in Section 2 above.

A requester must provide sufficient detail on the prescribed form to allow Beam Suntory to identify the record or records which have been requested and the identity of the requester (section 53(2) of PAIA). If a request is made on behalf of another person or entity, the requester must submit details and proof of the capacity in which the requester is making the request, which must be reasonably satisfactory to Beam Suntory (section 53(2)(f) of PAIA). The requester is also required to indicate the form of access to the relevant records that is required, and to provide his, her or its contact details in the Republic of South Africa (sections 53(2)(b) and (c) of PAIA).

The requester must identify the right that he, she or it is seeking to exercise by accessing records held by Beam Suntory and must explain why the particular record or records requested is or are required for the exercise or protection of that right (section 53(2)(d) of PAIA).

Beam Suntory may, and must in certain instances, refuse access to records on any of the grounds set out in Chapter 4 of Part 3 of PAIA which include:

- that access would result in the unreasonable disclosure of Personal Information about a third party,
- to protect the commercial information of a third party or of Beam Suntory itself, that it is necessary to protect the confidential information of a third party,

- to protect the safety of individuals or property,
- that a record constitutes privileged information for the purpose of legal proceedings,
- to protect the research information of a third party or Beam Suntory itself.

Access to documents may also be refused on the basis of professional privilege.

Beam Suntory is required to inform a requester in writing of its decision in relation to a request (section 56 of PAIA). If the requester wishes to be informed of Beam Suntory's decision in another manner as well, this must be set out in the request and the relevant details included, to allow Beam Suntory to inform the requester in the preferred manner.

Beam Suntory will make a decision in relation to a request for records within 30 days of receiving it, unless third parties are required to be notified of the request or the 30-day period is extended as provided for in PAIA. Beam Suntory will notify the requester if the 30-day period for processing a request is to be extended.

Where a request is refused, a requester may apply to the High Court within 30 days of being informed of the refusal of the request, for an order compelling the record or records requested to be made available to the requester or for another appropriate order. The High Court will determine whether the records should be made available or not.

Any request to be made under PAIA should be provided to the Information Officer using the following email address:

[privacy@beamsuntory.com](mailto:privacy@beamsuntory.com).

Pursuant to POPIA, data subjects may have the following rights:

- Right to be notified that personal information about him / her / it is being collected, and that his / her / its personal information has been unlawfully accessed.
- Right to access to confirm whether a responsible party holds personal information about him / her / it, and to request a responsible party to correct, destroy or delete personal information about him / her / it.
- Right to object on reasonable grounds, to the processing of his / her / it's personal information in certain circumstances, and to object, at any time, to the processing his / her / it's personal information for purposes of direct marketing.
- Right to reject unsolicited electronic communications for purposes of direct marketing, and not to be subject to a decision based solely on the automated processing of his / her / it's personal information and that is intended to provide a certain profile about him / her / it (e.g., credit worthiness, location, health, personal preferences, or conduct).
- Right to submit a complaint to the Information Regulator in the event of any alleged interference with his or her personal information.
- Right to institute civil proceedings for damages in the event of any alleged interference with his or her personal information.

Data subjects in South Africa may exercise any of these rights, free of charge, by using the "[Make a request](#)" option.

#### 9. Fees payable (section 54 of PAIA read with regulation 8 and Annexure B of the PAIA Regulations)

A requester has to pay a **request fee** of R140.00. This request fee may be paid at the time a request is made, or the person authorised to deal with such requests on Beam Suntory's behalf may notify the requester that he, she or it needs to pay the request fee before processing the request any further. A requester may apply to Court to be exempted from the requirement to pay the request fee.

Where a request for access to a record or records held by Beam Suntory is granted, the requester also has to pay an **access fee** for the reproduction of the record or records, and for the search for and the preparation of the records for disclosure. Beam Suntory is entitled to withhold a record until the required access fees have been paid. The access fees which are payable are as follows:



	Action taken	Fee
i.	The request fee payable by every requester	R140.00
ii.	Photocopy / printed black & white copy of an A4-size page	R2.00 per page or part thereof
iii.	Printed copy of an A4-size	R2.00 per page or part thereof
iv.	For a copy in a computer-readable form on - Flash drive (to be provided by requestor)	R40.00
	compact disc: o if provided by requestor o if provided to the requestor	R40.00 R60.00
v.	For a transcription of visual images, per A4-size page	Service to be outsourced. Will depend on quotation from service provider.
vi.	Copy of visual images	
vii.	Transcription of an audio record, A4-size page	R24.00
viii.	Copy of an audio record on:	
	• Flash drive (to be provided by requestor)	R40.00
	• Compact disc o If provided by the requestor o If provided to the requestor	R40.00 R60.00
ix.	To search for an prepare and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed the total cost of:	R435.00
x.	Deposit: if search exceeds 6 hours	One third of amount per request calculated in terms of items ii to viii.
xi.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

If Beam Suntory is of the opinion that the search for and the preparation of the records requested will require more than six hours, Beam Suntory is entitled to ask for a deposit of one third of the access fees which will be payable in respect of the records requested by the requester. The requester may make an application to the Court or lodge a complaint with the Information Regulator to be exempted from the requirement to pay this deposit. If a deposit is made and access to the records requested is subsequently refused, the deposit will be repaid to the requester.

**10. Information or records not found (section 55 of PAIA)**

If all reasonable steps have been taken to find a record that is requested under PAIA, and the requested record cannot be found or does not exist, then Beam Suntory will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

The affidavit or affirmation will provide a full account, of all the steps taken to find the record or to determine the existence thereof, including details of all communications by Beam Suntory with every person who conducted the search.

If the record in question should later be found, the requester will be given access to the record in the manner stipulated by the requester unless access is refused by Beam Suntory as permitted by PAIA (as dealt with in Section 8 above).

**11. Information requested about a third party (Chapter 5 of Part 3 of PAIA)**

Where any information that relates to a third party is requested in terms of PAIA from Beam Suntory, Beam Suntory is required to notify the third party of the request (section 71 of PAIA). The third party has an opportunity to grant their consent to the disclosure of the record or to make representations as to why the requested record should not be disclosed to the requester (section 72 of PAIA). If Beam Suntory decides to grant access to the record, it will notify the affected third party again (section 73 of PAIA). The third party is entitled to apply to court in relation to that decision. The court will then determine whether the record should be disclosed by Beam Suntory or not.

12. **Other prescribed information** (section 51(1)(a)(ii) of PAIA)

The Minister has not prescribed that any further information must be contained in this manual.

**ANNEXURE A: PROCESSING OF PERSONAL INFORMATION**

Beam Suntory takes the privacy and protection of Personal Information seriously and will only Process Personal Information in accordance with POPIA or any other applicable legislation which deals with privacy rights. Accordingly, the relevant Personal Information privacy conditions and requirements relating to the Processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion of Personal Information) will be applied to any Personal Information Processed by Beam Suntory.

Categories of Data Subjects and their Personal Information that Beam Suntory Processes

Data Subjects	Personal Information Processed
<p><u>Clients – Juristic Persons/Entities</u></p>	<ul style="list-style-type: none"> <li>• Names of contact persons;</li> <li>• Name of legal entity;</li> <li>• Physical and postal address and contact details;</li> <li>• Financial information;</li> <li>• Registration number;</li> <li>• Tax related information;</li> <li>• Authorized signatories;</li> <li>• Ultimate beneficial owners</li> <li>• Marketing data</li> </ul>
<p><u>Clients - other</u></p>	<ul style="list-style-type: none"> <li>• Names;</li> <li>• Registration number;</li> <li>• Contact details;</li> <li>• Physical and postal addresses;</li> <li>• Tax related information;</li> <li>• Confidential correspondence</li> <li>• Marketing data</li> </ul>
<p><u>Intermediary/Advisor</u></p>	<ul style="list-style-type: none"> <li>• Names of contact persons;</li> <li>• Name of legal entity;</li> <li>• Physical and postal address and contact details;</li> <li>• Financial information;</li> <li>• Registration number;</li> <li>• Tax related information;</li> <li>• Authorized signatories;</li> <li>• Ultimate beneficial owners</li> </ul>
<p><u>Contractors</u></p>	<ul style="list-style-type: none"> <li>• Names of contact persons;</li> <li>• Name of legal entity;</li> <li>• Physical and postal address and contact details;</li> <li>• Financial information;</li> <li>• Registration number;</li> <li>• Tax related information</li> <li>• Authorized signatories;</li> <li>• Ultimate beneficial owners</li> <li>• Marketing data</li> </ul>
<p><u>Employees/Directors</u></p>	<ul style="list-style-type: none"> <li>• Name and title</li> <li>• Gender;</li> <li>• Date of birth</li> <li>• Marital status;</li> <li>• Race;</li> <li>• Age;</li> <li>• Language;</li> <li>• Education information;</li> <li>• Financial information;</li> <li>• Employment history;</li> <li>• ID number;</li> <li>• Physical and postal address;</li> </ul>

Data Subjects	Personal Information Processed
	<ul style="list-style-type: none"> <li>• Contact details;</li> <li>• Opinions;</li> <li>• Criminal behavior;</li> <li>• Well-being</li> <li>• Photographs and CCTV footage</li> </ul>

#### Purpose of Processing Personal Information

Beam Suntory uses the Personal Information for the following purposes:

- To perform a contract to which the data subject is a party
- To pursue its legitimate interests or that of a third party
- To administer the client, customer, supplier and employment relationships
- To provide products and services
- To market and promote its products and services
- To improve and develop its business and products
- To provide and administer its loyalty programs
- To monitor and analyze trends, usage and activities in connection with its products and services
- For consumer support
- For website administration and enhanced user experience
- To comply with various laws and regulations
- Furtherance of business activities
- To participate in procurement processes
- For client registration processes

#### Categories of Recipients to whom Personal Information may be supplied

Beam Suntory may supply or share the Personal Information to service providers who render the following services:

- Capturing and organizing data;
- Storing data;
- Sending of emails and other correspondence to clients;
- Conducting due diligence checks.
- In order to manage business consultancies

Beam Suntory will conclude appropriate agreements with any service providers that Process Personal Information on its behalf to require service providers to protect Personal Information in line with the requirements of POPIA.

Beam Suntory does not share the Personal Information of its Data Subjects with any third parties, except if:

- It or the third party has a legitimate interest in the Personal Information being shared, and an appropriate balance has been struck between that interest and protecting Data Subjects rights
- It is necessary to conclude or implement a contract with a Data Subject
- It is obliged to provide such information for legal or regulatory purposes;
- It is required to do so for purposes of existing or future legal proceedings;
- It is involved in the prevention of fraud, loss, bribery or corruption; the third party performs services and Processes Personal Information on Beam Suntory's behalf as its Operator
- The third party performs services and Processes Personal Information on Beam Suntory's behalf as its Operator

Beam Suntory will send its Data Subjects appropriate notifications or communications of its Processing if it is obliged to do so by law, or in terms of its contractual relationship with Data Subjects.

#### Actual or planned transfers of Personal Information outside of South Africa

As part of the Beam Suntory Group operations, Beam Suntory may transfer Personal Information under its control to organizations in other countries in order to:

- liaise with other Beam Suntory affiliates and/or organizations,
- provide information to prospective clients,
- store data with third party cloud storage providers,

**Provide business updates**

Beam Suntory will take steps to ensure that Operators in foreign countries are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection of Personal Information and uphold the principles for reasonable and lawful processing of Personal Information, in terms of POPIA.

Beam Suntory also stores certain Personal Information, in particular HR information, in a cloud situated outside of South Africa, namely in the United States.

Beam Suntory has appropriate contracts in place with service providers to ensure that Personal Information is appropriately secured.

General description of information security measures implemented by Beam Suntory

Beam Suntory employs up to date technology to ensure the confidentiality, integrity and availability of the Personal Information under its care. Such measures include:

- Firewalls
- Secure web gateways
- Regular vulnerability scans of IT networks and systems
- Cybersecurity awareness training for all employees
- Virus protection software and update protocols
- Logical and physical access control
- Secure setup of hardware and software making up the IT infrastructure
- Requiring Operators who Process Personal Information on behalf of Beam Suntory to implement security controls in terms of Beam Suntory's contract with them

**ANNEXURE B**

**FORM 1**

**REQUEST FOR A COPY OF THE GUIDE**

[Regulations 2 and 3 of the PAIA Regulations]

**TO:** \*The Information Regulator  
 P.O Box 31533  
 Braamfontein  
 2017  
 Email address: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)  
 Tel. number: +27 (0) 10 023 5200

**OR**

The Information Officer

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I,

Full names:				
In my capacity as (mark with "X"):	Information Officer		Other	
Name of *public / private body (if applicable)				
Postal address				
Street address				
Email address				
Facsimile				
Contact numbers	Tel (W):		Cellular:	

hereby request the following copy(ies) of the Guide:

Language (mark with "X")		No of copies	Language (mark with "X")		No of copies
<input type="checkbox"/>	Sepedi		<input type="checkbox"/>	Sesotho	
<input type="checkbox"/>	Setswana		<input type="checkbox"/>	siSwati	
<input type="checkbox"/>	Tshivenda		<input type="checkbox"/>	Xitsonga	
<input type="checkbox"/>	Afrikaans		<input type="checkbox"/>	English	
<input type="checkbox"/>	isiNdebele		<input type="checkbox"/>	isiXhosa	
<input type="checkbox"/>	isiZulu				

Manner of collection (mark with "X"):

<input type="checkbox"/> Personal collection	<input type="checkbox"/> Postal address	<input type="checkbox"/> Facsimile	<input type="checkbox"/> Electronic communication (Please specify)
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Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

**SIGNATURE OF REQUESTER**

*\*Delete whichever is not applicable*

**ANNEXURE C**

**FORM 2**

**REQUEST FOR ACCESS TO RECORD**

[Regulation 7 of the PAIA Regulations]

Note:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation must be attached to this form.

**TO:** The Information Officer

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Email address:

Fax number:

Mark with an "X":

Request is made in my own name

Request is made on behalf of another person

PERSONAL INFORMATION			
Full names:			
Identity number:			
Capacity in which request is made (when made on behalf of another person):			
Postal address			
Street address			
Email address			
Contact numbers	Tel (W):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable)			
Identity number			
Postal address			
Street address			
Email address			
Contact numbers	Tel (W):		Tel (W):
	Cellular:		
<b>PARTICULARS OF RECORD REQUESTED</b>			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			

Description of record or relevant part of the record	
Reference number, if available	
Any further particulars of record	
<b>TYPE OF RECORD</b> (Mark the applicable box with an "X")	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
<b>MANNER OF ACCESS</b> (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public / private body (including listening to recorded words, information, which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
Email of information (including soundtracks if possible)	
Cloud share / file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	
<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.	
Indicate which right is to be exercised or protected	



<b>FEES</b>	
<p>(a) A request fee must be paid before the request will be considered.</p> <p>(b) You will be notified of the amount of the access fee to be paid.</p> <p>(c) The <b>fee payable for access</b> to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</p> <p>(d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.</p>	
Reason	

You will be notified in writing whether your request has been approved or denied and, if approved, the costs relating to your request, if any. Please indicate your preferred manner of correspondence (mark with an "X").

Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
**SIGNATURE OF REQUESTER / PERSON  
ON BEHALF OF WHOM REQUEST IS MADE**

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**FOR OFFICIAL USE**

Reference number:	
Request received by: (state rank, name, and surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
**SIGNATURE OF INFORMATION  
OFFICER**

**FORM 3**  
**OUTCOME OF REQUEST AND OF FEES PAYABLE**  
 [Regulation 8]

Note:

1. If your request is granted the—
  - (a) amount of the deposit, (if any), is payable before your request is processed; and
  - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

Personal inspection of information at registered address of public/private body ( <i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i> ) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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**OR**

**2. You requested:**

Printed copies of the information ( <i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i> )	
Written or printed transcription of virtual images ( <i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i> )	
Transcription of soundtrack ( <i>written or printed document</i> )	
Copy of information on flash drive ( <i>including virtual images and soundtracks</i> )	
Copy of information on compact disc drive ( <i>including virtual images and soundtracks</i> )	
Copy of record saved on cloud storage server	

**3. To be submitted:**

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format ( <i>including transcriptions</i> )	
E-mail of information ( <i>including soundtracks if possible</i> )	
Cloud share/file transfer	
Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

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**4. Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

**5. Deposit payable (if search exceeds six hours):**

Yes

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_  
 Name of account holder: \_\_\_\_\_  
 Type of account: \_\_\_\_\_  
 Account number: \_\_\_\_\_  
 Branch Code: \_\_\_\_\_  
 Reference Nr: \_\_\_\_\_  
 Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
 Information officer