THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 (“THE ACT” OR “PAIA”)

PAIA PRIVATE BODY MANUAL

Woolworths Holdings Limited

DATE OF REVISION: JUNE 2026

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MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 ("the Manual")

1. Introduction

The Promotion of Access to Information Act (hereinafter referred as "the Act") gives effect to section 32 of the Constitution of the Republic of South Africa 1996, which provides that everyone has the right of access to information. Section 51 of the Act requires that all private bodies to prepare and make available a Manual to the public regarding the procedure which the public must follow when submitting a request to access the private bodies' records. The Manual has been compiled for Woolworths Holdings Limited and the following subsidiaries, and other juristic persons and joint ventures in which it has a direct or indirect interest: Woolworths (Pty) Ltd ("**WSA**"); E-Com Investments 16 (RF) (Pty) Ltd; Woolworths Developments (RF) (Pty) Ltd; Universal Product Networks (RF) (Pty) Ltd; Virtual Market Place (RF) (Pty) Ltd ("**VMP"**); Witchery Fashions SA (Pty) Ltd; Country Road Ventures (Pty) Ltd (incorporated in Australia); Woolworths Financial Services (Pty) Ltd ("**WFS"**); and NowNow Foods (Pty) Ltd (collectively referred to as the "**Woolworths Group**").

2. Woolworths Holdings Limited

Woolworths Holdings Limited is a public listed company which carries on the business of an investment holding company focusing on the direct or indirect investment in retail operations throughout South Africa, Africa, Australia and New Zealand, through its various subsidiaries and other juristic persons mentioned above.

Head of Private Body	:	Samuel Ngumeni
Registration number	:	1929/001986/06
Registered Address	:	Woolworths House 93 Longmarket Street Cape Town 8001
Postal Address	:	P O Box 680 Cape Town 8000

3. Contact details for PAIA requests for all Woolworths Group companies

The Information Officer may appoint where it is deemed necessary Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of PAIA. This is in order to render the Company as accessible as reasonable possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of PAIA.

All requests made in terms of the Act relating to any Woolworths Group entities as identified in this Manual should be directed to the following Deputy Information Officers who have been appointed to deal with these requests:

Information Officers:

WSA Information Officer	Chantel Reddiar
WFS Information Officer	Sivi Pillay

Deputy Information Officers:

WSA Deputy Information Officer	Viren Jagarnath
WSA Deputy Information Officer	Percy Mmolotsi
WFS Deputy Information Officer	Anina Potgieter
WFS Deputy Information Officer	Alistair Purvis

Access to Information General Contacts:

Physical Address	Woolworths House 93 Longmarket Street Cape Town 8001
Postal Address	PO box 680 Cape Town 8000
Telephone Number	+27 21 407 9111
Fax Number	+27 21 407 2191
Email	WSA: compliance@woolworths.co.za WFS: privacyrequest@wfs.co.za
Website	http://www.woolworthsholdings.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, electronic mail address of-

4.3.2.1 the Information Officer of every public body, and

4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA

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 11; and

4.3.3.2 access to a record of a private body contemplated in section 50;

4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6 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-

4.3.6.1 an internal appeal;

4.3.6.2 a complaint to the Regulator; and

4.3.6.3 an application with a court against a decision by the information officer 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;

4.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

4.3.10 the regulations made in terms of section 92.

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 A copy of the Guide is also available in English and Xhosa, for public inspection at our registered address during normal office hours.

4.6 The Guide can also be obtained at the Regulator's email and physical address below. A requester or data subject has the right to lodge a complaint with the Information Regulator regarding the processing of personal information or access to records in terms of PAIA and POPIA.

Information Regulator (South Africa)

Woodmead North Office Park, 54 Maxwell Drive, Woodmead,

Johannesburg, 2191, Gauteng Province, South Africa

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Email: enquiries@inforegulator.org.za

Website: www.inforegulator.org.za

Toll Free: +27 80 001 7160

5. Records held in terms of applicable legislation (Section 51(1)(b)(iii) of the Act)

All of the Woolworths Group entities are required by law to keep certain records. These records are enumerated in various Acts of Parliament. The Woolworths Group holds the records in terms of the acts as set out in Annexure "I".

6. Records held as a matter of standard practice (Section 51(1)(b)(iv) of the Act)

The Woolworths Group keeps certain records in the conduct of day-to-day business and as a matter of standard practice and good governance. The subjects and categories of the records held by the Woolworths Group identified above are set out in Annexure "II".

7. Records which are automatically available without having to make a request in the prescribed form (Section 51(1)(b)(ii) of the Act)

7.1 Woolworths Group does not have a separate notice of records automatically available to requesters. The provisions of this paragraph 7 constitute the entire list of records automatically available for purposes of section 51(1)(b)(ii) of the Act; these records being:

7.1.1 Woolworths Group in-house brochures, newspapers and newsletters;

7.1.2 Product information and promotional material intended for public viewing;

7.1.3 Annual Reports; and

7.1.4 All information contained on each of the Woolworths Group websites.

8. Description of personal information processing in terms of the Protection of Personal Information Act, 4 of 203 ("POPIA")

The Woolworths Group processes personal information lawfully and in a manner that does not infringe on your privacy. More specifically, the Woolworths Group processes personal information in accordance with POPIA and for reasons set out in our privacy policy, which is available on our website **[Here]** and is also attached hereto, marked "**Annexure III**").

8.1 The Woolworths Group processes personal information for the following purposes:

8.1.1 to facilitate the sale of products and services, which includes handling transactions, processing payments, managing orders, and delivering products;

8.1.2 to provide comprehensive customer service and support, such as handling inquiries, complaints, returns, and after-sales assistance;

8.1.3 for our marketing and promotional activities;

8.1.4 for compliance with statutory obligations;

8.1.5 for recruitment and management of employee relationships;

8.1.6 for payroll processing, benefits administration, performance evaluations, and compliance with labor laws;

8.1.7 for customer relations;

8.1.8 for operational needs, including management of relationships with suppliers and vendors;

8.1.9 to ensure the security and safety of customers, employees, and property;

8.1.10 for administrative and legal purposes, including handling internal operations, complying with legal processes, and addressing any legal disputes or claims; and

8.1.11 for data analytics and business development activities.

8.2 Categories of data subjects and personal information

8.2.1 Employees/prospective employees: personal details, health and financial information, employment history, payroll information, and performance evaluations throughout the employee life cycle.

8.2.2 Shareholders: personal details.

8.2.3 Customers/prospective customers: personal details, transaction history, and feedback are processed to facilitate sales, customer service, and personalised marketing efforts.

8.2.4 Visitors: personal details, physical and electronic access records, surveillance records.

8.2.5 General public: information from general inquiries and interactions on our website is processed to manage public relations and provide information.

8.2.6 Suppliers and vendors: contact details, contracts, and transaction history.

8.2.7 Industry bodies: membership records are maintained to facilitate compliance with industry standards and regulations.

8.2.8 Service providers: records of service providers, including contact details and contractual agreements.

8.2.9 Media: interaction records with media personnel are maintained to manage media relations and public communications.

8.3 Recipients of the personal information

8.3.1 Members of Woolworths Group, including employees, subsidiary companies, associates, assignees and successors in title for any of the purposes specified in our privacy policy;

8.3.2 Service providers, suppliers, business partners and vendors;

8.3.3 Credit reporting bodies and credit providers;

8.3.4 Employee pension funds;

8.3.5 Financial institutions;

8.3.6 Industry bodies;

8.3.7 Law enforcement agencies;

8.3.8 Medical aid schemes;

8.3.9 Service providers or operators;

8.3.10 Statutory authorities; and

8.3.11 Courts of law and/or tribunals that require the personal information to adjudicate referrals, actions or applications.

8.4 Planned trans-border flows of personal information

8.4.1 Personal information may be transferred to operators located outside South Africa for processing services provided on behalf of the Woolworths Group.

8.4.2 Personal information may be shared with other members within Woolworths Holding Limited group situated in different countries to ensure seamless business operations and management.

8.4.3 Personal information may be disseminated through social media platforms, which often involve transborder data flows, to engage with customers and the public.

8.4.4 We will only transfer personal information outside of South Africa (i) after we have made sure there are arrangements in place to adequately protect the personal information under the recipients' applicable country laws or in terms of an agreement with the recipient; (ii) where the transfer of the personal information is necessary for Woolworths Holdings Limited or any member of the Woolworths Group to conclude, or perform, under a contract with the data subject or a contract with a third party that is in the data subject's interest; (iii) where the data subject has consented to the transfer of the personal information; and/or (iv) where it is not reasonably practical to obtain the data subject's consent but the transfer is for the data subject's benefit.

8.5 Security measures to protect personal information

8.5.1 Physical security measures, including access control measures and internal security protocols, are implemented to protect personal information from unauthorised physical access.

8.5.2 Cybersecurity measures such as anti-spam, anti-virus protections, and the installation of security firewalls are used to protect information from cyber threats.

8.5.3 Password control policies are enforced to ensure that only authorised personnel can access sensitive information.

8.5.4 Regular training programs on information security are conducted to educate employees on best practices and compliance requirements.

8.5.5 Information security audits are carried out periodically to assess and improve the effectiveness of security measures.

8.5.6 Comprehensive IT-related company policies are established to govern the use, management, and protection of personal information within Woolworths Group.

9. Making a request in terms of the Act

9.1 The first step in the process is to obtain "**Request Form 2**".

9.2 You are also able to get the form together with a list of applicable fees from the Head Office of Woolworths Group, indicated in the street address, or via the email address provided above. These fees must be paid before access to a record will be allowed. You will be informed of the amount of your fees once you have submitted your request. The Minister may exempt certain persons from having to pay the fees referred to in the Act. To date, no such exemptions have been published. If the request is made orally as a result of illiteracy or a disability of a requester, the Information Officer will assist you to complete the prescribed form.

9.3 Once you have filled in the form you need to submit it to the Information Officer at the postal address, fax number listed above or electronic mail: compliance@woolworths.co.za / privacyrequest@wfs.co.za

9.4 If the record you have requested exists and allowing access to it does not affect a third party your request will be processed within 30 days.

9.5 This period may be extended once for a further 30 days if:

9.5.1 the request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of the Woolworths Group;

9.5.2 the request requires a search for records in, or collection thereof from, an office of the Woolworths Group not situated in the same town or city as the office of the Information Officer and this search cannot reasonably be completed within the original 30 days;

9.5.3 consultation among divisions of the Woolworths Group or with another private body is necessary or desirable to decide upon the request and this consultation cannot reasonably be completed within the original period;

9.5.4 more than one of the circumstances contemplated in the prior paragraphs exist in respect of the request making compliance with the original period not reasonably

possible; or

9.5.5 you, as the requester, consent in writing to such extension.

10. Grounds for Refusal

10.1 There are various grounds upon which your request for access to a record may be refused. They are:

10.1.1 the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;

10.1.2 the protection of commercial information of a third party (for example trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);

10.1.3 refusing access to a record if disclosure would result in the breach of a duty of confidence owed to a third party;

10.1.4 refusing access to a record if it would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;

10.1.5 refusing access to a record that was produced during legal proceedings, unless that legal privilege has been waived;

10.1.6 refusing access to a record containing trade secrets, financial or sensitive information or any information that would put the Woolworths Group at a disadvantage in negotiations or prejudice it in commercial competition;

10.1.7 refusing access to a record containing information about research being carried out or about to be carried out on behalf of a third party or by the Woolworths Group;

10.1.8 Section 70 of the Act contains an overriding provision. Disclosure is compulsory if it would reveal a substantial contravention of, or failure to comply with the law, or imminent and serious public safety or environmental risk and the public interest in the disclosure of the record clearly outweighs the harm contemplated by its disclosure; and

10.1.9 if your request does affect a third party then we will first need to inform the third party within 21 days of us receiving your request. By this we mean that if the record you request affects any third party in any way, that third party will have to be informed that you are requesting access to the above record. The third party then has 21 days to make representations and/or submissions regarding the granting of access to the record.

11. The Information Officer's Decision and Requester's Recourse

11.1 Once the Information Officer of the Woolworths Group has heard all the submissions, he or she will make a decision as to whether or not access to the record will be granted. If the request is granted, you will then be granted access to the record within 30 days of being informed of the decision.

11.2 If the Information Officer does decide to grant you access to the record, but the request affects a third party, the third party that has been affected has 30 days in which to appeal the decision, also in the High Court. If no appeal is lodged within 30 days, you must be granted access to the record.

11.3 If the Information Officer does not grant you access to the record you are entitled to appeal the decision and will need to lodge your appeal in the High Court. You will receive reasons as to why the request was refused.

12. Other information

The schedule below outlines the time-periods, which are applicable to the Act. This will enable you to understand the process whereby requests for access to records are considered and the time periods involved.

Act Section	Description of Activity	Time Period
10	The Guide published by the Information Regulator (South Africa) to assist in the use of this Act must be published.	Available from the Information Regulator website since 2021
51	Preparation of Company Manual	Available after 28 February 2003
56	Information Officer to decide whether to grant request for access to record that does not relate to a third party and notify requestor	Within 30 days after the request has been received
57	Information Officer to notify third party of an extension of the 30-day time period with reasons for the extension	Within 30 days of receiving the request (this may only be done **once** and only for the reasons in this section)
71	Information Officer to notify third party of request for access to information that relates to him/her	Within 21 days of request for access to record affecting the third party has been received
71	Third party to give written consent or written/oral submissions to Information Officer	Within 21 days of being informed by the Information Officer of the request for access to the record
73	Information Officer to make a decision about the granting of access to a record which relates to a third party and notify third party and requestor	30 days after every third party has been informed of the request
73	Information Officer to give requestor access to the record if a decision has been made to grant access	Within 30 days of notifying requestor of the decision to allow access
74	If access to a record is denied, the requestor has 30 days in which to lodge an application at court to appeal against the refusal	30 days from date of notification by Information Officer of decision
74	If access to a record which affects a third party is granted, third party may lodge an application to court to appeal decision of Information Officer within 30 days	Within 30 days of notification by the Information Officer of the decision
71	If no appeals lodged by third party, Information Officer must give access to the record	Within 30 days of notification by Information Officer of third party

The Woolworths Group strives to be a leader in its industry in all fields, including its practical subscription to the guiding principles in our Constitution such as transparency and the free flow of information. Should you have any queries regarding the use of this Manual, please do not hesitate to contact the Deputy Information Officers or myself.

Issued by:

_____

Mr Samuel Ngumeni | Group Chief Executive Officer

PRESCRIBED FEES

The requester is required to pay an access fee as prescribed by the Minister for Justice and Constitutional Development to enable the company to recover the cost of processing a request and giving access to records in terms of PAIA. Other fees apply depending on the request.

Payment details can be obtained from the Information Officer. A request shall not be processed until the prescribed fees have been paid and where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

Section 51(1)(f)) of the Act

When the request is received by the Information Officer he/she shall by notice require the requester to pay the prescribed request fee of R140,00, before further processing of the request. The access and reproduction fees payable by a requester are as of date hereof as follows:

• For every photocopy of an A4 size page or part	R2,00
• For every printed copy of an A4 size page or part thereof held on a computer or in electronic or machine-readable form	R2,00
• For a copy in a computer readable form on:	
• compact disc	R40,00
• For a transcription of visual images, for an A4 size page or part thereof	TBC
• For a copy of visual images	TBC
Services to be outsourced and depend on quotation from service provider.	
• For a transcription of an audio record, for an A4 size page or part thereof	R24,00
• For a copy of an audio record on:	
Flash drive (proved by the requestor)	R40,00
Compact disc	
If provided by the requestor	R40,00
If provided to the requestor	R60,00

To search for and prepare the record for disclosure, R145,00 for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation which may not exceed R435,00.

If a search for the record has been made and the preparation of the record for disclosure, including arrangements to make it available in the requested form, requires more than the six hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed one third portion of the access fee, which would be payable if the request is granted.

The actual postage is payable when a copy of a record must be posted to a requester.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

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

_____

_____

_____

_____

(Address)

E-mail 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				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made *(if applicable):*				
Identity Number				
Postal Address				

Street Address				
E-mail Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			

PARTICULARS OF RECORD REQUESTED

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.)*

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD
*(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	

FORM OF ACCESS *(Mark the applicable box with an "**X**")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(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)*	
E-mail 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)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *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	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

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

Postal address	**Facsimile**	**Electronic communication** ***(Please specify)***

Signed at _____ this _____ day of _____ 20 _____

_____

Signature of Requester / person on whose behalf request is made

---

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 *(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)* 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.	

OR

2. You requested:

Printed copies of the information *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of information on flash drive *(including virtual images and soundtracks)*	
Copy of information on compact disc drive *(including virtual images and soundtracks)*	
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 *(including transcriptions)*	
E-mail 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)*	

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

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 • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 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 • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60. 00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

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

INTERNAL APPEAL FORM

FORM 4

[Regulation 9]

Reference Number: **……..**

PARTICULARS OF PUBLIC BODY				
Name of Public Body				
Name and Surname of Information Officer:				
PARTICULARS OF COMPLAINANT WHO LODGES THE INTERNAL APPEAL				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				
Is the internal appeal lodged on behalf of another person?	Yes	☐	No	☐
If answer is "yes", capacity in which an internal appeal on behalf of another person is lodged: *(Proof of the capacity in which appeal is lodged, if applicable, must be attached.)*				
PARTICULARS OF PERSON ON WHOSE BEHALF THE INTERNAL APPEAL IS LODGED ***(If lodged by a third party)***				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				

DECISION AGAINST WHICH THE INTERNAL APPEAL IS LODGED *(mark the appropriate box with an "X")*	
Refusal of request for access	
Decision regarding fees prescribed in terms of section 22 of the Act	
Decision regarding the extension of the period within which the request must be dealt with in terms of section 26(1) of the Act	
Decision in terms of section 29(3) of the Act to refuse access in the form requested by the requester	
Decision to grant request for access	

GROUNDS FOR APPEAL *(If the provided space is inadequate, please continue on a separate page and attach it to this form. all the additional pages must be signed)*	
State the grounds on which the internal appeal is based:	
State any other information that may be relevant in considering the appeal:	

You will be notified in writing of the decision on your internal appeal. Please indicate your preferred manner of notification:

Postal address	Facsimile	Electronic communication *(Please specify)*

Signed at _____ this _____ day of _____ 20 _____

_____

Signature of Appellant/Third party

FOR OFFICIAL USE

OFFICIAL RECORD OF INTERNAL APPEAL

Appeal received by: *(state rank, name and surname of Information Officer)*				
Date received:				
Appeal accompanied by the reasons for the information officer's decision and, where applicable, the particulars of any third party to whom or which the record relates, submitted by the information officer:		Yes ☐ No ☐		
OUTCOME OF APPEAL				
Refusal of request for access. Confirmed?	Yes No	☐ ☐	New decision *(if not confirmed)*	
Fees (Sec 22). Confirmed?	Yes No	☐ ☐	New decision *(if not confirmed)*	
Extension (Sec 26(1)). Confirmed?	Yes No	☐ ☐	New decision *(if not confirmed)*	
Access (Sec 29(3)). Confirmed?	Yes No	☐ ☐	New decision *(if not confirmed)*	
Request for access granted. Confirmed?	Yes No	☐ ☐	New decision *(if not confirmed)*	

Signed at _____ this _____ day of _____ 20 _____

_____

Relevant Authority

ANNEXURE "I"

RECORDS KEPT IN TERMS OF APPLICABLE LEGISLATION

Section 51(1)(b)(iii) of the Act

Records are kept in accordance with such other legislation as is applicable to Woolworths Holdings Limited and the Woolworths Group. Where applicable and insofar as the requester complies with the requirements set out in the relevant legislation, this Manual and the Act, the requester may request information held by the Woolworths Group companies which is available in terms of the following legislation, as amended:

Applicable legislation	**Category of records**
Companies Act No 71 of 2008	Company documents and Legal Records
Employment Equity Act No. 55 of 1998	Employment Records / Human Resources
Basic Conditions of Employment Act No. 75 of 1997	Employment Records / Human Resources
Labour Relations Act No. 66 of 1995	Employment Records / Human Resources
Occupational Health and Safety Act No. 85 of 1993	Employment Records / Human Resources
Compensation for Occupational Injuries and Diseases Act No. 130 of 1993	Employment Records / Human Resources
Broad Based Black Economic Empowerment Act No. 53 of 2003	Company documents and Legal Records Share Registration Documents
Skills Development Act No. 97 of 1998	Employment Records / Human Resources
Skills Development Levies Act No. 9 of 1999	Employment Records / Human Resources
Unemployment Insurance Act No. 63 of 2001	Employment Records / Human Resources
Pension Funds Act No. 24 of 1956	Employment Records / Human Resources
Income Tax Act No. 58 of 1962	Financial and Accounting Records
Value Added Tax Act No. 89 of 1991	Financial and Accounting Records
National Credit Act No. 34 of 2005	Customer Records and Credit Services
Electronic Communications and Transactions Act No. 25 of 2002	Communication
Competition Act No. 89 of 1998	Supplier Records Product Records Franchise Records
The Liquor Products Act No. 60 of 1989	Product Records
Regulation of Interception of Communications and Provision of	Communication Information Technology

Communication Related Information Amendment Act No. 48 of 2008	
The Liquor Act No. 27 of 1989	Product Records
Legal Metrology Act No. 9 of 2014	Product Records
Standards Act No.8 of 2008	Product Records
Merchandise Marks Act No. 17 of 1941	Product Records
Agricultural Products Standards Act No. 119 of 1990	Product Records
Foodstuffs, Cosmetics and Disinfectants Act No. 54 of 1972	Product Records
Businesses Act No. 71 of 1991	Company documents and Legal Records
Patents Act No. 57 of 1978	Company documents and Legal Records
Trademarks Act No. 194 of 1993	Company documents and Legal Records
Designs Act No. 195 of 1993	Company documents and Legal Records
Consumer Protection Act No. 68 of 2008	Product Records Customer Records and Credit Services
Promotion of Access to Information Act No. 2 of 2000	Legal Records
Protection of Personal Information Act No.4 of 2013	Customer Records and Credit Services

ANNEXURE "II"

RECORDS KEPT AS A MATTER OF GENERAL PRACTICE
Section 51(1)(b)(iv) of the Act

The subjects and categories of official and/or confidential information on which the private body holds records are as follows:

1. Company documents and Legal Records

- Company policies
- Company directives
- Records of all local subsidiaries and other juristic persons in which it has a direct or indirect interest
- Names of Directors
- Operational records
- Trademarks and patents
- Registered designs, including all visual presentations and store designs
- Legal records
- Domain name registration
- Insurance policies

2. Employment Records / Human Resources

- Recruitment records
- Employment contracts
- Service Agreements
- Employment Conditions and Policies
- Confidentiality Agreements
- Restraints of Trade Agreements
- Commission Agreements
- Casual employee records
- Employee records – employment history, health records, third party records provided to the company on its personnel, internal evaluation records
- Disciplinary records
- CCMA records
- Pension Fund records
- Retirement records
- Remuneration and benefits records
- Medical Aid records
- Agreements with Trade Unions
- Training schedules and material

3. Share Registration Documents

- Allotment letters
- Share Register
- Share Certificates
- Redemption / conversion / discharge forms or endorsed certificates
- Share / stock transfer forms
- Scrip, certificate, warrant or like instrument representing any share, stock of debenture
- Dividend and Interest payment list

4. Property Records

- Title deeds
- Lease Agreements

- Contracts in respect of properties

5. Customer Records and Credit Services

- Customer records
- Transaction records
- Sales records
- Suretyship Agreements
- Terms and conditions of purchase
- Debtors' information
- Debtors with ITC/Lawyers for collection
- Records which customers have provided to a third party acting for and on behalf of the company

6. Supplier Records

- Contracts with suppliers
- Purchase order information
- Records pertaining to all distribution centres
- Records generated by or within the company pertaining to suppliers including transactional record

7. Product Records

- Fabric test reports
- Garment data sheet
- Red Seal and Black seal reports
- Product specification records in respect of all food products, including recipes, approved ingredients, final products and standards
- Reports of chemical and micro testing of all food products
- General product testing results
- Records of the costs of goods acquired for resale and the selling price of such goods

8. Franchise Records

- All franchise records pertaining to local and foreign franchises

9. Communication

- Internal correspondence and memorandums
- Correspondence to persons outside of the company
- Minutes of meetings

10. Financial and Accounting Records

- Financial records and reports
- Accounting records
- Audit records and reports
- Sundry debtors' records
- Company risk and controls profile
- Legal records
- Banking details
- Treasury related records
- Shipping records
- Fraud information

11. Marketing

- Marketing and advertising records

12. Information Technology

- Business and data information
- IT Technology capabilities
- Systems and User manuals

PROTECTING YOUR PRIVACY

PROTECTING YOUR PRIVACY

Last updated: June 2025

Protecting your privacy is as important to us as it is to you. For us, it's more than just making sure we comply with the relevant legislation; you trust us with your personal information and we respect that trust. This privacy notice explains why and how we collect, use and store your personal information. If you have any questions please contact us at 0860 022 002 or at custserv@woolworths.co.za.

All of the provisions of this privacy notice are important, but please pay special attention to the parts that are in bold writing. These parts contain information about provisions that have special consequences for you. These parts are only intended to bring such provisions to your attention, and, where necessary, to explain their fact, nature and effect. Where explanations are given, they may be contained in a box. Such boxed explanations are aids to understanding only and are not provisions themselves. They do not limit the meaning or application of the provisions, and do not apply only to the situations and examples described in the boxes or only to similar situations or examples.

What is this notice about?

We want you to understand who you are sharing your information with, what kind of information we are collecting and how we use the information.

In your day-to-day dealings with Woolworths we obtain information about you. We want you to know exactly what that information is and what we do with it. After all, trust is nothing without transparency.

We need your information to deliver the right product, at the right time and in the right place.

We ask for your information to make sure that we can offer the right product at the right time and in the right place. This includes making sure that you can receive the benefit of the MyDifference programme, analysing your data to better understand what your needs are, and sending you promotional information.

The Protection of Personal Information Act protects you.

The Protection of Personal Information Act (POPI) is aimed at protecting your personal information and prescribes what we must and must not do with it. POPI created an Information Regulator who checks that companies like Woolworths manage personal information in a responsible manner that respects your privacy.

Other legislation applies to your personal information.

Other legislation also applies to your personal information. For instance, if you are applying for a Credit Card, a Store Card or a Personal Loan the Financial Intelligence Centre Act and the National Credit Act have to be complied with. This means that from time to time we will be obligated to process your personal information in a certain way (or keep it for a certain period).

This privacy notice is part of our agreement with you.

This privacy notice forms part of our agreement with you. You should read it along with the terms and conditions that apply. These terms and conditions can be accessed **here**.

This notice may change from time to time.

From time to time we may have to amend this notice to accommodate changes in our business or services or if legal requirements change.

Your consent to the processing of your personal information

By agreeing to this privacy notice, you provide us with your express consent and agreement that we may collect, get, receive, record, organise, collate, store, update, change, retrieve, read, process, consult, use and share your personal information in the manner set out in this privacy notice.

If you do not agree with this privacy notice, or are concerned about any aspect as it relates to your personal information, please do not continue to use the Woolworths website or any services offered by us.

In the paragraph above you expressly give your permission to us to process your personal information in the manner and for the purposes set out in this privacy notice. By doing this, you know and accept that you are giving up certain parts of your right to privacy.

Who you are sharing your information with

Woolworths is a group of companies.

You know us just as Woolworths, but in fact we are a group of companies that includes Woolworths (Proprietary) Limited and Woolworths Financial Services (Proprietary Limited). When you share your information with one of these companies, subject to your marketing and/or communication preferences selected in your application form or as otherwise indicated by you to us, you may also be sharing it with one of the others. **This notice relates to the following three companies:**

- **Woolworths (Pty) Ltd:** If you join the MyDifference programme Woolworths requires your personal information. In addition, your personal information may also be used in the day-to-day business of providing Woolworths products to you.
- **Woolworths Financial Services (Pty) Ltd (WFS)**: Woolworths Financial Services (WFS) provides the Woolworths in-store card, credit card, insurance and personal loans and the MyDifference Plus programme. If you use one of these services WFS require your personal information. Your information will also be shared with our banking partner, **Absa Group Ltd.** For more on the company click **here**

In some instances you may also be sharing your information with other companies that are part of Woolworths Holdings Limited or other companies that help us provide services to you. This notice does not apply to them.

What information we collect

When you join MyDifference, MyDifference Plus or apply for a Woolworths Store Card, Credit Card, loan or insurance, we collect the personal information we need to make it happen.

If you are a member of the MyDifference or MyDifference Plus programme, or have a Store Card or Woolworths Credit Card or an online account we collect your personal information. Depending on what you apply for we require information such as your name, e-mail address, contact numbers, ID or passport number, gender, date of birth, physical address, billing address, payment card details, financial information and history, employment information, communication preferences, language preferences, signature and eventually a Woolworths card number. We collect this information to process your application so you can have a customer record with us. This is how we provide all the services as set out in the terms and conditions for these programmes and cards.

Only your email address, name and surname, contact details and such other information as we specify from time to time, constitutes compulsory information. All other information is optional. If you do not agree to share compulsory information with us, then you will not be able to make full use of the features that are offered to Woolworths customers. If you do not agree to share your optional information with us, then you might not be able to enjoy all of the features and functionality on our website or offered through any Woolworths services.

In the paragraph above, you agree and accept that there is certain compulsory information you must provide us with if you want to enjoy all of the features and functionality on the Website. If you decide not to provide us with such compulsory information, you agree that we may limit certain features and functionality on the website or our services.

We collect information to analyse purchasing patterns.

If you swipe any Woolworths card, we collect some more information, such as your shopping preferences. Analysing information like this helps us ensure we do the best possible job of meeting your needs.

We conduct surveys from time to time.

We send out surveys from time to time. You can choose to respond or not, and you can unsubscribe from receiving them.

We collect information while you use our website.

When you shop on our Woolworths app or www.woolworths.co.za we collect standard information about your internet connection and website use. We collect this information from registered and unregistered users. We use this information to help us improve our APP, website and online services.

The type of information we collect includes the URL you came from, IP address, domain type, browser type, the country and telephone code where your device is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered on our website (user information).

When you place an online order with us, we may offer to store your payment card details for your convenience, so you do not have to re-enter these details in future.

We use cookies to optimise your website experience, but you can opt out.

A cookie is a small piece of information stored by your browser on your device. It may contain some personal details, the contents of your shopping basket, and date and time information in an encrypted format, which can be recalled when you return to the Woolworths website. This speeds up our identification, ordering and delivery processes.

We use cookies to identify the device you use to connect to our website. We use anonymous cookies to collect data about how you use our website, so that we can improve and optimise your website experience. We use the anonymous DoubleClick cookie and Google Analytics cookie to optimise your web experience and deliver relevant advertising on the Google Display Network based on the activity of visitors to our website.

You may disable the use of cookies by configuring your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do so, you may not be able to enjoy all of the features and functionality of the website. You can opt out of Google Analytics for Display Advertisers and out of customized Google Display Network advertising by visiting Google's Ad Preferences Manager.

We collect information when you contact our Call Centre to respond to your query.

When you contact our customer support services, we collect information that helps us to categorise your query, respond to it and, if applicable, investigate what went wrong. We also use this information to track potential problems and trends to customise our support responses to provide a better service to you.

We don't collect the information of persons under 18.

We do not collect the information of persons under 18 without the consent of their parents or guardians. If you are under the age of 18 you must not provide personal information to us without the consent of your parent or guardian.

Our facilities are monitored by CCTV cameras.

Our facilities are monitored by CCTV cameras for public safety, crime prevention and quality control.

Lay-by agreements, WConnect, Gift Cards, beauty counters and other services.

We have to collect some of your information when you enter into a lay-by agreement, purchase a cell phone, replace a lost or stolen gift card or transfer a gift card to another branch and other services.

Why we need your personal information

We use your personal information to provide our products and services to you.

We use your personal information to provide our products and services to you. This includes:

- processing your payment card details in order to complete any purchase,
- delivering products that you order online,
- calculating your MyDifference and/or MyDifference Plus Rewards level, and ensuring that you receive your MyDifference and/or MyDifference Plus benefits which could include instant savings, information about preview sales, free W magazines and exclusive personalised vouchers and other loyalty benefits.
- sending statements and any other legal documents,
- any other purpose relating to providing products and services, and
- when we have a legal duty to use or disclose your information.

Here are some of the more specific purposes for which your personal information is used by Woolworths Financial Services. For more details check the financial terms and conditions.

In addition to the general uses listed here, Woolworths Financial Services (WFS) processes your information if you apply for a credit card, store card, loans or insurance. If you have applied for one of these products, the WFS **terms and conditions** will apply.

If you have applied for a Woolworths Store Card,Credit Card or Personal Loan your personal information will also be used for the following purposes:

- WFS will need to use your financial information, including your credit history, which WFS will obtain from a credit bureau and the South African Fraud Prevention Services, to decide whether you qualify for a credit facility.

- WFS will provide the following information to any registered credit bureaux and the South Africa Fraud Prevention Services:
    - information about your agreement with WFS;
    - information about your WFS account;
    - details of any default should you not comply with your credit agreement;
    - any false information which you provide to WFS
- WFS must comply with all regulations relating to credit and insurance. This will involve processing your personal information. In particular, WFS must comply with the National Credit Act 34 of 2005.
- WFS is required to process your information for purposes of local and international crime prevention. One example of this is the Financial Intelligence Centre Act 38 of 2001 or 'FICA'.
- WFS will provide information to credit bureaux and the SA Fraud Prevention Services about your agreement, about your WFS account, details of any default should you not comply with the terms of your credit agreement and any false information which you have provided to credit bureaux and the South African Fraud Prevention Services.
- If you have a Woolworths Credit Card or Store Card you will automatically be a member of the MyDifference and MyDifference Plus programmes and your personal information will be used to ensure that you receive your benefits.
- WFS may use your personal and transactional information, together with information relating to your use of our products and services, to calculate rewards, determine your personalised earn rate, allocate actions, personalise offers and administer the MyDifference Plus programme. These processes are carried out in accordance with predetermined programme criteria and are subject to appropriate governance and oversight.

Our call centres record their calls for quality control and record-keeping purposes.

When you contact our call centres, the information you give us will be used to investigate and resolve your query, complaint or request. Calls are recorded for quality control and record-keeping purposes.

Our call centres are committed to keeping your personal information safe and secure. Please take care not to provide more information than what we ask for. Never give us your banking details, credit card details or any passwords. Any unnecessary information you give us will not be retained.

We only share your personal information with companies that help us to provide our services to you and who have agreed to keep your information secure, confidential and to only use it for authorised purposes.

Your privacy is important to us, which is why it is our policy not to share your personal information with other companies. We will never sell your personal information.

We use suppliers or service providers who we trust to provide services to us and sometimes that involves sharing your information with them. They operate under strict requirements aimed at keeping your personal information secure and confidential and they will only use it for the purpose for which we have sent it to them.

Sometimes we have to send your personal information to other countries.

Some of these service providers may be located in other countries that may not have the same levels of protection of personal information as South Africa. If this is the case, we require that they undertake to protect the personal information of our customers to the same level that we do.

Your rights and preferences

You have the right to know what personal information we have about you, to correct it and to opt out of any marketing.

You have the right to:

- ask what personal information we hold about you;
- ask what information was sent to our suppliers, service providers or any other third party;
- ask us to update, correct or delete any out-of-date or incorrect personal information we hold about you;
- unsubscribe from any direct marketing communications we may send you;
- object to the processing of your personal information.

It can take us up to 21 days to respond to your request.

If you want us to delete all personal information we have about you, you will probably have to terminate all agreements you have with us in respect of your Store Card, Credit Card or Personal Loan, MyDifference programme and MyDifference Plus programme. We cannot maintain our relationship with you without having some of your personal information.

We can refuse to delete your information if we are required by law to retain it or if we need it to protect our rights.

You can request access to the information we hold about you by contacting our call centres.

Some of your information is available online.

You are able to view and correct some of your information online by creating an online profile. Other information can be corrected via the call centre.

Security

We take your privacy and the security of your personal information seriously.

We have implemented reasonable security safeguards to protect the personal information that you provide. For example sensitive data (such as your credit card information) is protected by SSL encryption when it is exchanged between your web browser and our website.

We regularly monitor our systems for possible vulnerabilities and attacks. **As no system is perfect we cannot guarantee that information may not be accessed, disclosed, altered or destroyed by breach of any of our physical, technical or managerial safeguards.**

In this paragraph, you acknowledge that you know and you accept that technology is not absolutely secure and there is a risk that your personal information will not be secure when processed by means of technology. We do not promise that we can keep your personal information completely secure. You will not be able to take action against us if you suffer losses or damages in these circumstances.

Please note that any e-mail you send to us is not encrypted and may be monitored by us. Please do not send us sensitive or confidential personal information by means of e-mail. Instead, contact our call centre on 0860 022 002 or send a message via our website.

We will inform you if your privacy is ever compromised.

Although we cannot prevent all security threats, we have measures in place to minimise the threat to your privacy. We will let you know of any breaches which affect your personal information.

You have a right to lodge a complaint to the Information Regulator (POPIAComplaints@inforegulator.org.za) for any contravention of POPI.

Third Party sites

To the extent allowed by law, we are not responsible for the privacy practices of a third party site to which there may be a link on the website, or for any claims, loss or damage arising from these.

We advise you to read the privacy policy of each site which you visit and to determine your privacy settings in accordance with your personal preferences.

We are not liable if you suffer losses or damages when visiting third party websites by following a link to that website from the Website. You accept that there may be risks when you use such third party websites, and you do so at your own risk.

Protection of Personal Information Act and other laws

If this privacy notice or any provision in this privacy notice is regulated by or subject to POPI or other laws, it is not intended that any provision of this privacy notice contravenes any provision of POPI or such other laws. Therefore all

provisions of this privacy notice must be treated as being qualified, to the extent necessary, to ensure that the provisions of POPI and such other laws are complied with.

No provision of this privacy notice:

- does or purports to limit or exempt us from any liability (including, without limitation, for any loss directly or indirectly attributable to our gross negligence or wilful default or that of any other person acting for or controlled by us) to the extent that the law does not allow such a limitation or exemption;
- requires you to assume risk or liability for the kind of liability or loss, to the extent that the law does not allow such an assumption of risk or liability; or
- limits or excludes any warranties or obligations which are implied into this privacy notice by POPI (to the extent applicable), or other applicable laws or which we give under POPI (to the extent applicable), or other applicable laws, to the extent that the law does not allow them to be limited or excluded.

General

You agree that this privacy notice, our relationship and any dispute of whatsoever nature relating to or arising out of this privacy notice whether directly or indirectly, shall be governed by the laws of the Republic of South Africa without giving effect to any principle of conflict of laws.

You agree that we may, at any time, transfer, cede, delegate or assign any or all of our rights and obligations under this privacy notice without your consent. We will notify you if we transfer, cede, delegate or assign any rights or obligations to a third party, but we do not have to notify you if we transfer, cede, delegate or assign any rights or obligations to any of our affiliates or to any person which acquires all or part of our business and/or assets. We may also sub-contract our obligations without your consent and we do not have to notify you if we sub-contract any of our obligations.

Our failure to exercise or enforce any right or provision of this privacy notice shall not constitute a waiver of such right or provision.

Each provision of this privacy notice, and each part of any provision, is removable and detachable from the others. As far as the law allows, if any provision of this privacy notice, or part of a provision, is found by a court or authority of competent jurisdiction to be invalid, illegal or unenforceable (including, without limitation, because such provision is inconsistent with the laws of another jurisdiction), it must be treated as if it was not included in this privacy notice and the rest of this privacy notice will still be valid and enforceable.