	PAIA MANUAL	
	COMPILATION DATE	3 August 2026
	REVISION DATE	3 August 2027
	VERSION	1.0
SECTION	INFORMATION COMPLIANCE	
SUBJECT	PAIA MANUAL	

WILDLIFE PHARMACEUTICALS (PTY) LTD
Registration number 1997/017062/07

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

Date of compilation: 3 August 2026
Next revision due: 3 August 2027

1 Definitions

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

Term	Definition
Writing	As referred to in section 12 of the Electronic Communications and Transactions Act, 2002 (Act No. 25 of 2002)

2 Purpose of the PAIA Manual

This PAIA Manual is useful for the public to:

2.1 Check the categories of records held by a body which are available without a person having to submit a formal PAIA request.

2.2 Have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.

2.3 Know the description of the records of the body which are available in accordance with any other legislation.

2.4 Access all the relevant contact details of the IO and DIO who will assist the public with the records that they intend to access.

2.5 Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.

2.6 Know if the body will process personal information, the purpose of processing of personal information, and the description of the categories of data subjects and of the information or categories of information relating thereto.

2.7 Know the recipients or categories of recipients to whom the personal information may be supplied.

2.8 Know if the body has planned to transfer or process personal information outside of the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.

2.9 Know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3 Key Contact Details for Access to Information of Wildlife Pharmaceuticals

3.1 Information Officer

Name	Cobus du Plessis
Contact number	011 675 5331
Email address	cobus.du.plessis@fagron.co.za

3.2 Deputy Information Officer

Name	Bianca Jordaan
Contact number	011 675 5331
Email address	bianca.jordaan@fagron.co.za

3.3 General contacts for access to information

Email address	cobus.du.plessis@fagron.co.za

3.4 National or head office

Registered name	Wildlife Pharmaceuticals (Pty) Ltd
Postal address	38 Wilken Street Rocky Drift White River 1240
Physical address	38 Wilken Street Rocky Drift White River 1240
Contact number	013 751 2328
Email	vetsupplies@wildpharm.co.za
Website	www.wildpharm.co.za

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

4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised guide on how to use PAIA ("guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2 The guide is available in each of the official languages and in braille.

4.3 The aforesaid guide contains the description of:
- 4.3.1 The objects of PAIA and POPIA;
- 4.3.2 The postal and street address, phone and fax number and, if available, email address of:
  - 4.3.2.1 The IO of every public body, and
  - 4.3.2.2 Every DIO of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA[1];
- 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[2].
  - 4.3.3.2 Access to a record of a private body contemplated in section 50[3].
  - 4.3.3.3 An internal appeal.
  - 4.3.3.4 A complaint to the Regulator.

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

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

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

4.3.3.5 An application with a court against a decision by the IO of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.

4.3.4 The provisions of sections 14[4] and 51[5] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.5 The provisions of sections 15[6] and 52[7] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.6 The notices issued in terms of sections 22[8] and 54[9] regarding fees to be paid in relation to requests for access;

4.3.7 The regulations made in terms of section 92[10];

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

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

4.3.10 All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging.

4.4 Members of the public can inspect or make copies of the guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The guide can also be obtained:

4.5.1 Upon request to the IO.

4.5.2 From the website of the Regulator (www.inforegulator.org.za.)

4.6 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:

4.6.1 English.

4.6.2 Afrikaans.

4.6.3 Zulu.

5 Guide of Information Regulator

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

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

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

5.4 You may also inspect the guide at Wildlife Pharmaceuticals' offices during ordinary working hours.

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

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

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

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

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

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

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

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

Postal address	P O Box 31533, Braamfontein, Johannesburg, 2017
Contact number	+27 (10) 023-5200
Website	www.inforegulator.org.za
Email	PAIAComplaints@inforegulator.org.za.

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

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

7 Availability of Certain Records in terms of PAIA

7.1 Categories of records of the Wildlife Pharmaceuticals which are available without a person having to request access:

Category of Records	Types of the Record	Available on Website	Available on Request
PAIA Manual	Company's current PAIA Manual	X	X
Company overview	Company profile, business activities, animal pharmaceutical / veterinary pharmaceutical manufacturing activities, products and services, company contact details	X	X
Policies (public-facing)	Privacy policy, website cookies policy	X	X
Legal disclosures	Legal notices, disclaimers, terms and conditions, regulatory notices and other public disclosures applicable to the company's operations	X	X
Regulatory and Compliance Information	Publicly available regulatory, accreditation and certification information relating to the company's animal pharmaceutical manufacturing operations, where disclosure is permitted	-	X
Product and Service Information	Public product information, product categories, veterinary pharmaceutical / animal health product information, brochures and descriptions of services	X	X
News and announcements	Company announcements, news, product-related announcements, regulatory or operational updates and other public communications	X	X
Public marketing materials	Brochures, product catalogues, company presentations, promotional materials and descriptions of animal health /	X	X

Category of Records	Types of the Record	Available on Website	Available on Request
	pharmaceutical products and services		
Supplier / Tender Information	Supplier registration information, public tender information and applicable accreditation or certification documents, where disclosure is permitted	X	X
POPIA and PAIA awareness training certificates	Records of internal or external training / awareness sessions on data protection (POPIA) and access to information (PAIA)	-	X
Contact information for IO	Name, designation, email address, telephone / fax / physical address	X	X

7.2 Subjects on which records are held and the categories of records held on each subject

Subject	Categories of records held
Corporate and governance	Memorandum of incorporation, company registration documents, board and shareholder minutes and resolutions, share register, statutory returns, insurance policies
Manufacturing and production	Batch manufacturing records, batch packing records, in-process records, equipment logs, cleaning and maintenance records, calibration records, validation and qualification records
Quality assurance and quality control	Standard operating procedures, specifications, analytical test records, certificates of analysis, stability data, deviations, investigations, corrective and preventive actions, internal and external audit records, supplier and vendor qualification records
Regulatory affairs	Product registration applications and certificates, product dossiers, variations, renewals, regulatory correspondence, licences and permits, product labelling and package inserts, pharmacovigilance and adverse event records
Research and development	Formulation development records, laboratory notebooks, trial and study records, technical reports
Sales, marketing and customers	Customer records and accounts, quotations, orders, invoices, delivery records, contracts and distribution agreements, complaint records, marketing material and website records
Procurement, supply chain and warehouse	Supplier records and contracts, purchase orders, goods received records, stock and inventory records, import and export documentation, customs records, transport and delivery records
Human resources	Employment contracts, personnel files, payroll and remuneration records, leave and attendance records, disciplinary and grievance records, training records, employment equity records, skills development records
Occupational health, safety and environment	Health and safety committee records, risk assessments, incident and injury on duty reports,

Subject	Categories of records held
	occupational health assessment records, waste and environmental records
Finance and tax	Financial statements, accounting records, general ledger, tax returns and assessments, banking records, budgets, audit files
Information technology and site services	System access records, user account records, security and access control records, closed circuit television footage, maintenance and facility records
Access to information and data protection	This manual, PAIA request records and registers, data subject request records, records of information security incidents, records of processing activities, awareness training records

7.3 Description of the records/subjects of Wildlife Pharmaceuticals which are available in accordance with any other legislation:

Category of Records	Applicable Legislation	Department/ Subject Area
Memorandum of Incorporation, company registration documents, minutes of board meetings, share register	Companies Act, 71 of 2008	Finance
Employment contracts, employee attendance records, payroll information, leave records	Basic Conditions of Employment Act, 75 of 1997	People and Culture
Disciplinary records, grievance procedures, union agreements, Commission for Conciliation, Mediation and Arbitration (CCMA) documentation	Labour Relations Act, 66 of 1995	People and Culture
Employment Equity (EE) plans, EE reports, committee meeting minutes	Employment Equity Act, 55 of 1998	People and Culture
Tax returns, IRP5 certificates, Pay-As-You-Earn (PAYE) records, employee tax submissions	Income Tax Act, 58 of 1962	Finance
Workplace Skills Plans (WSPs), annual training reports, learnership agreements	Skills Development Act, 97 of 1998	People and Culture
Unemployment Insurance Fund (UIF) contribution records, declarations, employee benefit claim records	Unemployment Insurance Act, 63 of 2001	People and Culture
Health and safety audits, incident reports, risk	Occupational Health and Safety Act, 85 of 1993	Site Services

Category of Records	Applicable Legislation	Department/ Subject Area
assessments, safety committee records		
Value-Added Tax (VAT) returns, input/output tax records, SARS correspondence	Value-Added Tax Act, 89 of 1991	Finance
Workers Compensation Assistance (WCA) claims, injury-on-duty reports, compensation records	Compensation for Occupational Injuries and Diseases Act, 130 of 1993	Site Services
B-BBEE certificates, ownership and supplier development records	Broad-Based Black Economic Empowerment Act, 53 of 2003	Warehouse and Logistics
Client contracts, complaint records, marketing disclaimers, product/ service terms and conditions	Consumer Protection Act, 68 of 2008	Regulatory Affairs and Sales Support
Veterinary medicine registration applications, registration certificates, product dossiers, product information, regulatory submissions, variations and regulatory correspondence	Medicines and Related Substances Act, 101 of 1965, (and applicable regulations)	Regulatory Affairs and Quality Assurance
Data subject consent forms, privacy notices, PAIA Manual, operator agreements, processing activity records	Protection of Personal Information Act, 4 of 2013	Regulatory Affairs
PAIA Manual, access request logs, training records	Promotion of Access to Information Act, 2 of 2000	Regulatory Affairs
Electronic communications policies, e-signature consents, website terms and conditions	Electronic Communications and Transactions Act, 25 of 2002	Site Services
Import/export documentation, customs records and records relating to international movement of veterinary pharmaceutical products	Customs and Excise Act, 91 of 1964	Warehouse and Logistics
Pharmacy premises licence, recording of the pharmacy and of the pharmacy owner, responsible pharmacist records, pharmacy inspection reports and related correspondence	Pharmacy Act, 53 of 1974	Quality Assurance and Regulatory Affairs
Employer tax records, employee tax certificates, records retained for tax purposes and correspondence with the South African Revenue Service	Tax Administration Act, 28 of 2011	Finance

Category of Records	Applicable Legislation	Department/ Subject Area
Skills development levy returns and supporting payroll records	Skills Development Levies Act, 9 of 1999	Finance and People and Culture
Unemployment insurance contribution returns and declarations	Unemployment Insurance Contributions Act, 4 of 2002	Finance and People and Culture

**Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.*

7.4 Wildlife Pharmaceuticals holds and/or processes the following records for the purposes of PAIA and POPIA:

7.4.1 PAIA: PAIA Manual; PAIA guides; PAIA records; PAIA submission records; awareness training.
7.4.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.
7.4.3 Further information which may be made available upon request.

7.5 The above-mentioned records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

8 Request Process

8.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.

8.2 The requester must complete Form 02 of PAIA Forms (Request for Access to Record) and submit it to the IO at the details specified herein.

8.3 The prescribed form as well as payment of a request fee and a deposit (if applicable) must be submitted to the IO at/via the postal or physical address, fax number or email address as is stated herein.

8.4 The prescribed form must be completed with enough particularity to enable the IO to determine:
8.4.1 The record(s) requested;
8.4.2 The identity of the requestor;
8.4.3 What form of access is required; and
8.4.4 The postal address or fax number of the requestor.

8.5 The requestor must state that the records are required for the requestor to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records are requested is required to exercise or protect the right.

8.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the IO that the request be dealt with sooner.

8.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or if the request requires a search for information held at another office of Wildlife Pharmaceuticals and the information cannot be reasonably obtained within 30 (thirty) days. The IO will notify the requestor in writing should an extension be necessary.

8.8 The IO must communicate a response to the request for access using Form 03 of PAIA Forms (Outcome of Request and of Fees Payable), available at the link in the applicable forms section. This communication shall inform the requestor of:
8.8.1 The decision; and
8.8.2 Fees payable.

8.9 In the event that the IO is of the opinion that the searching and preparation of the record for disclosure would amount to more than six (6) hours, he/she shall inform the requestor to pay a deposit not exceeding one third of the amount payable.

8.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the IO for assistance.

8.11 An oral request can be made to the IO should the requestor be unable to complete the form due to illiteracy or a disability. The IO will then complete the form on behalf of the requestor and provide a copy of the form to the requestor.

8.12 Form 2 of POPIA Forms (Request for Correction or Deletion), available at the link in the applicable forms section, is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data.

8.13 Form 3 of POPIA Forms (Application for the Issue of a Code of Conduct), available at the link in the applicable forms section, is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing.

8.14 Form 4 of POPIA Forms (Request for Consent – Direct Marketing), available at the link in the applicable forms section, enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to.

8.15 Form 5 of POPIA Forms (Complaint Regarding Interference with Personal Information), available at the link in the applicable forms section, allows a data subject or complainant to submit a complaint to the IR concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations.

9 Grounds for Refusal

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

9.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.

9.2 Mandatory protection of the commercial information of a third party, if the records contain:
- 9.2.1 Trade secrets of that third party;
- 9.2.2 Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
- 9.2.3 Information disclosed in confidence by a third party to Wildlife Pharmaceuticals, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.

9.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.

9.4 Mandatory protection of the safety of individuals and the protection of property.

9.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.

9.6 Protection of the commercial information of Wildlife Pharmaceuticals, which may include:
- 9.6.1 Trade secrets;
- 9.6.2 Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of Wildlife Pharmaceuticals;
- 9.6.3 Information which, if disclosed, could put Wildlife Pharmaceuticals at a disadvantage in contractual or other negotiations or prejudice Wildlife Pharmaceuticals in commercial competition; and/or
- 9.6.4 Computer programs which are owned by Wildlife Pharmaceuticals, and which are protected by copyright and intellectual property laws.

9.7 Research information of Wildlife Pharmaceuticals or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.

9.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10 Remedies Should a Request be Refused

10.1 If Wildlife Pharmaceuticals does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO are final.

10.2 A requester who is aggrieved by a decision of the head of Wildlife Pharmaceuticals to refuse a request, or by a decision taken under section 54, 57(1) or 60 of PAIA, must first submit a complaint to the Information Regulator in terms of section 77A of PAIA, within 180 (one hundred and eighty) days of the decision. Only once that complaints procedure has been exhausted may the requester apply to a court for appropriate relief in terms of sections 78 and 82 of PAIA, within 180 (one hundred and eighty) days. Complaints to the Information Regulator are submitted on Form 05, and the Regulator's contact details appear in section 5 of this manual.

11 Fees

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

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by Wildlife Pharmaceuticals)	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by Wildlife Pharmaceuticals)	R60.00 once-off
Search for and preparation of the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Postage, email or any other electronic transfer	Actual expense, if any

12 Processing of Personal Information

12.1 The purposes for processing personal information include:

12.1.1. To respond to enquiries, complaints, requests, claims and other communications received from customers, suppliers, employees, applicants, visitors and other relevant data subjects.
12.1.2. To establish and manage relationships with customers, suppliers, service providers, contractors and other business partners.
12.1.3. To process payments, invoicing, billing, accounts, reconciliations and other financial and administrative activities.
12.1.4. To recruit, appoint, manage and administer employees, job applicants, contractors and other personnel.
12.1.5. To conduct pre-employment screening and verification, where applicable, including verification of qualifications, employment history, references and other information relevant to recruitment.
12.1.6. To administer employee remuneration, benefits, leave, training, performance management, disciplinary matters and other employment-related processes.

12.1.7. To administer employee health, occupational health and safety and related workplace requirements, where applicable.
12.1.8. To manage physical access to company premises, including visitor management, access control, CCTV monitoring and, where applicable, biometric access control.
12.1.9. To maintain the security of company premises, personnel, information, systems and assets and to investigate security incidents or suspected unauthorised access.
12.1.10. To communicate with customers, suppliers, service providers, regulatory authorities and other relevant stakeholders in relation to the company's business and operational activities.
12.1.11. To comply with applicable legal, regulatory and industry requirements relating to the company's animal pharmaceutical / veterinary pharmaceutical operations.
12.1.12. To communicate with regulatory authorities and respond to regulatory, compliance, audit and reporting requirements, including where applicable requirements associated with the regulation of animal pharmaceutical products.
12.1.13. To manage contracts and agreements with employees, customers, suppliers, contractors, service providers and other third parties.
12.1.14. To manage information processed through third-party service providers, IT systems, cloud services and other technology platforms used in the company's operations.
12.1.15. To conduct internal investigations, audits, dispute resolution, claims management and incident investigations.
12.1.16. To conduct direct marketing and communicate information regarding the company's products, services or business activities, where permitted by applicable law and subject to the relevant data subject rights.
12.1.17. To maintain records and information necessary for business continuity, governance, risk management, quality management and regulatory compliance.
12.1.18. To transfer or disclose personal information to authorised third parties where necessary for the purposes described above and where permitted by applicable law.
12.1.19. To operate the company's website and online ordering facility, including registering and verifying users as veterinary or medical professionals, processing orders and payments, and providing customer support.

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

Categories of Data Subjects	**Personal Information that may be Processed**
Customers/clients	Names and surnames, contact details, business contact information, physical/business addresses, identification or registration information where applicable, correspondence, account information, transaction information and payment-related information.
Suppliers / Service providers	Names and surnames, contact details, business contact information, physical/business addresses, company registration information, VAT information, banking/payment details, contractual information, correspondence and other information required to manage the supplier relationship.
Employees	Names and surnames, identity or passport number, date of birth, contact details, residential address, next of kin and dependant details, tax reference number, banking details, remuneration and benefit information, medical aid and retirement fund membership information, qualifications, employment history, references, employment contract and terms of employment, attendance, leave and time records,

	performance and disciplinary records, training records, occupational health and safety records including injury on duty and occupational health assessment information where applicable, access control records including biometric access information and CCTV footage where applicable, IT system access and usage information, and correspondence.
Dependants and next of kin of employees	Names and surnames, relationship to the employee, contact details, date of birth and identity number where required, and other information required to administer employee benefits, medical aid, insurance and leave.
Job Applicants	Names and surnames, contact details, CVs, qualifications, employment history, references, identification information and, where applicable, declarations made by the applicant regarding previous criminal convictions.
Contractors / Freelancers	Names and surnames, identification information, contact details, residential/business address, banking details, tax information, contractual information, qualifications, experience and work-related information.
Visitors / Guests	Names and surnames, contact details, visitor registration information, vehicle registration information where recorded, access records, CCTV footage and, where applicable, biometric access information.
Regulatory Bodies / Authorities	Names and contact details of relevant officials and representatives, correspondence, regulatory submissions, compliance information and other information required for regulatory or statutory purposes.
Shareholders / Investors	Names and surnames, contact details, identification information, banking information where applicable, shareholding information, corporate records, correspondence and other information required for governance and statutory purposes.
IT / System Users	Names and surnames, employee/user identification information, usernames, login and authentication information, access permissions, system and access logs, device information, IP addresses and other security-related information.
Marketing / Newsletter Subscribers	Names and surnames, business contact details, email address, telephone number, marketing preferences, communication history, consent/objection records and interaction history.
Website users and registered customers	Names and surnames, contact details, business or delivery address, login and account credentials, professional registration or qualification declaration, order and transaction history, payment related information, marketing preferences, and website usage information including internet protocol address and browsing activity collected through cookies and analytics.

12.3. Special Personal Information

Wildlife Pharmaceuticals processes the following categories of special personal information as contemplated in section 26 of the Protection of Personal Information Act, 4 of 2013:

12.3.1. Biometric information, being fingerprint or other biometric data used for physical access control to company premises and restricted areas. The prohibition in section 26 does not apply because the information is processed in terms of section 33(1) of the Act by a responsible party that has obtained that information in accordance with the law. Processing of this information in respect of personnel in the service of the company takes place in accordance with rules established in compliance with labour legislation, as required by section 33(2) of the Act.

12.3.2. Information concerning the health of employees, contractors and visitors, being occupational health assessment information, injury on duty records and related medical information. The prohibition in section 26 does not apply because the information is processed in terms of section 32(1)(f) of the Act by an employer, where processing is necessary for the implementation of the provisions of laws which create rights dependent on the health of the data subject, and for the reintegration of or support for workers entitled to benefit in connection with sickness or work incapacity, read with the company's obligations under the Occupational Health and Safety Act, 85 of 1993 and the Compensation for Occupational Injuries and Diseases Act, 130 of 1993. Such information is processed subject to the duty of confidentiality contemplated in section 32(2) of the Act.

12.3.3. Information concerning the criminal behaviour of a data subject, being declarations made by employees and job applicants regarding previous criminal convictions, and any related information obtained in accordance with the law. The prohibition in section 26 does not apply because the information is processed in terms of section 33(1) of the Act by a responsible party that has obtained that information in accordance with the law.

No other category of special personal information referred to in section 26 of the Act is processed. Special personal information is subject to the security safeguards described in this manual and to more restrictive access controls.

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

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be Supplied
Qualifications, for qualification verifications	South African Qualifications Authority
Driver's licence and vehicle details, for driver verification	Road Traffic Management Corporation (RTMC), Department of Transport
Banking details	Financial institutions, payment processors
Health information (for occupational health assessments)	Occupational health service providers, medical professionals

Customs and import/export documentation (for cross-border logistics)	South African Revenue Service (SARS) Customs Division, international customs authorities
Regulatory and compliance information	South African Health Products Regulatory Authority (SAHPRA), Department of Health, Department of Employment and Labour, SARS, auditors, accreditation bodies and other relevant regulatory or governmental authorities
Security clearance information (for restricted access areas)	Security service providers, regulatory bodies
Skills development and training records	Sector Education and Training Authorities (SETAs)
CCTV footage and security incident records	Authorised security service providers; law enforcement authorities (if required)
Employee name, identity number, contact details, banking and remuneration information for participating employees	Allan Gray, as administrator of the retirement annuity fund that employees may join through the company.
All categories of personal information held in the company's electronic systems	Fagron BV and other companies in the Fagron group, and their information technology personnel, in their capacity as administrators of the group information technology environment in which the company's systems operate.
Customer, contact and sales pipeline information; website user and order information; email and document content	Third party technology providers that host or process information on behalf of the company, being the customer relationship platform monday.com, the company's website hosting and online shop platform, website analytics provided by Google, and the Microsoft 365 environment.
Employee personal information, including identity, contact, remuneration, benefit and employment records	The Microsoft 365 environment, the People Inc group human resources system, and Sage Business Cloud Payroll, as the systems in which employee records are held and processed.

14. Planned Transborder Flows of Personal Information

Wildlife Pharmaceuticals may transfer or store certain categories of personal information outside the Republic of South Africa, primarily through the use of cloud-based service providers, payment gateways, marketing platforms, and IT hosting providers. These service providers may be located in the jurisdictions listed in the table below.

The country in which personal information will be stored
South Africa. Records held on the company's own premises and on locally hosted systems, including physical access control, clocking and closed circuit television records.
Netherlands and other member states of the European Union. Email, documents, Teams messages and SharePoint content held in the Fagron group Microsoft 365 environment, and customer, contact and sales pipeline information held in the monday.com customer relationship platform.

14.1. Wildlife Pharmaceuticals may share personal information with third parties and in certain instances this may result in transborder flow of the personal information. The personal

information will always be subject to protection, not less than the protection it is afforded under the Protection of Personal Information Act No.4 of 2013.

14.2. General description of information security measures to ensure the confidentiality, integrity and availability of the information:

14.2.1. Access to information systems, electronic records and personal information is restricted through user access controls and authentication mechanisms;
14.2.2. Physical and electronic records are stored in controlled environments with access restricted to authorised personnel;
14.2.3. Access to company premises is controlled through appropriate physical security measures, including visitor management, security systems, CCTV and, where applicable, biometric access control;
14.2.4. Personal information is subject to retention and secure destruction requirements in accordance with applicable legal, regulatory and business requirements;
14.2.5. Employees and relevant personnel receive data protection and information security awareness training to promote appropriate handling of personal information;
14.2.6. Third-party service providers that process personal information on behalf of the company are subject to appropriate contractual and information security requirements;

14.3. In addition, the following technical security safeguards have been implemented to support these objectives:

14.3.1. Technical access controls and authentication mechanisms are used to restrict access to systems and information based on authorised user access and business requirements.
14.3.2. Anti-virus and anti-malware protections are implemented on applicable company devices and systems.
14.3.3. Network security controls, including firewall protections and other applicable security measures, are used to protect company systems and information from unauthorised access.
14.3.4. Multi-factor authentication and access permissions are implemented for applicable systems and users to reduce the risk of unauthorised access.
14.3.5. Electronic information is stored and processed using applicable security and encryption measures, including protections available within the company's Microsoft 365 environment.
14.3.6. Backups and recovery mechanisms are implemented to support the availability and integrity of business information.
14.3.7. System and access activity may be logged and monitored to assist with the identification and investigation of suspicious or unauthorised activity.
14.3.8. Physical security measures, including visitor controls, secure storage, CCTV, security systems and access controls, are used to protect premises, equipment and information.
14.3.9. Electronic and physical records are securely disposed of when they are no longer required, subject to applicable retention requirements.
14.3.10. The company's information security safeguards are reviewed and updated as appropriate to address changes in technology, business processes, identified risks and applicable legal or regulatory requirements.
14.3.11. Employee records are held electronically with access controls rather than in physical files.
14.3.12. Certain of these safeguards are operated within the Fagron group information technology environment rather than by the company directly.

15. Availability of the Manual

15.1. A copy of the manual is available:

15.1.1. On www.wildpharm.co.za and at any head office of Wildlife Pharmaceuticals for public inspection during normal business hours;
15.1.2. To any person upon request and upon the payment of a reasonable prescribed fee; and
15.1.3. To the Information Regulator upon request.

15.2. A fee for a copy of the manual, as contemplated in Annexure B of the Regulations, shall be payable per each A4-size photocopy made.

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

16.1. A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) or section 11(3)(b) of the Act, must submit the objection to a responsible party at any time during office hours of a responsible party and free of charge.

16.2. A data subject who wishes to object to the processing of personal information must do so on a form substantially similar to Form 3 of POPIA Forms, available at the link in the applicable forms section, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, or WhatsApp and or in any manner expedient to a data subject in terms of section 11(3)(a) of the Act.

16.3. A responsible party must, when collecting personal information of a data subject, notify the data subject, in terms of section 18(1)(h)(iv) of the Act, of their right to object, as referred to in section 11(3) of the Act.

16.4. If an objection to the processing of personal information of a data subject is made telephonically, such an objection shall be electronically recorded by a responsible party and upon request, be made available to the data subject in any manner, including the transcription thereof.

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

17.1. A data subject has the right, in terms of section 24 of the Act, to request, where necessary, the correction, destruction, or deletion of his, her or its personal information.

17.2. A data subject, who wishes to request a correction or deletion of his, her, or its personal information, as provided for in section 24(1)(a) of the Act, has the right to request correction or deletion of personal information at any time and free of charge, if the personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

17.3. A data subject who wishes to request the destruction or deletion of a record of his, her, or its personal information in terms of section 24(1)(b) of the Act, has the right to request the destruction or deletion of a record of his, her or its personal information at any time and free of charge, if a responsible party is no longer authorised to retain such information in terms of section 14 of the Act.

17.4. A request for correction to or deletion of personal information, as referred to in clause 17.2 or a request for the destruction or deletion of a record of personal information, as

referred to in clause 17.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms, available at the link in the applicable forms section, free of charge and reasonably accessible to a data subject by hand, fax, post, email, SMS, WhatsApp message or in any manner expedient to a data subject.

17.5. A request for a correction or deletion of personal information by telephonic means shall be recorded by a responsible party and such recording must, upon request, be made available to a data subject in any manner, including the transcription thereof which shall be free of charge.

17.6. A responsible party must, within 30 (thirty) days of receipt of the outcome of the request referred to in clause 17.2 or 17.3, notify a data subject, in writing, of the action taken as a result of the request.

18. Updating of the Manual

The head of Wildlife Pharmaceuticals will review and, where necessary, update this manual annually. The next review is due on 3 August 2027. The Information Officer is responsible for the review.

Head of the private body	Cobus du Plessis
Title of the head of the body	Director
Information Officer	Cobus du Plessis
Deputy Information Officer	Bianca Jordaan

APPLICABLE FORMS

Each form below links to the current version published by the Information Regulator. Copies are also available on request from the Information Officer at the details in section 3 of this manual.

PAIA Forms

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

POPIA Forms

Form 1: Objection to the Processing of Personal Information
Form 2: Request for Correction or Deletion of Personal Information or Deletion of Record of Personal Information
Form 3: Application for the Issue of a Code of Conduct
Form 4: Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing
Form 5: Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing