RUMIKA GROUP

PAIA MANUAL

Rumika (Pty) Ltd | Rumika Consulting and Rumika Industry

Version	1.0
Effective date	06th November 2026
Next review	Annually, or sooner if any information in this manual changes

1. INTRODUCTION AND PURPOSE

The Promotion of Access to Information Act 2 of 2000 (PAIA) gives effect to the constitutional right of access to any information held by another person that is required for the exercise or protection of any rights (section 32 of the Constitution). Section 51 of PAIA, as amended by the Protection of Personal Information Act 4 of 2013 (POPIA), requires every private body to compile a manual that explains how this right may be exercised.

This manual:

- identifies Rumika (Pty) Ltd and its Information Officer;
- describes the subjects and categories of records Rumika holds and which records are available without a formal request;
- explains the procedure and fees for requesting access to a record and the grounds on which access may be refused; and
- describes how Rumika processes personal information, as required by POPIA.

Listing a category of record in this manual does not mean that access will be granted. Every request is assessed on its own merits in terms of PAIA.

2. ABBREVIATIONS

Information Officer	The head of Rumika (Pty) Ltd for the purposes of PAIA and POPIA, or a person duly authorised by them
PAIA	Promotion of Access to Information Act 2 of 2000
PAIA Regulations	Regulations relating to PAIA published under Government Notice R757 of 27 August 2021
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	The Information Regulator established under section 39 of POPIA
Requester	Any person (including a public body or its official) requesting access to a record held by Rumika, or a person acting on their behalf
Rumika	Rumika (Pty) Ltd, including when trading as Rumika Group, Rumika Consulting or Rumika Industry

3. COMPANY PROFILE AND CONTACT DETAILS

Rumika Group is the trading identity of Rumika (Pty) Ltd, a private company registered in the Republic of South Africa. Rumika Consulting and Rumika Industry operate as business divisions or trading activities of Rumika (Pty) Ltd and do not constitute separate legal entities.

Rumika connects capital, industry and international markets. **Rumika Consulting** provides investment and strategic advisory, sustainable finance, governance and risk management, transaction structuring, commodity sourcing and international trade facilitation services. **Rumika Industry** supplies industrial equipment, manufacturing solutions, engineering technologies and modular industrial systems.

All requests in terms of this manual must be addressed to the Information Officer of Rumika (Pty) Ltd. The divisions do not have separate Information Officers.

Registered name	Rumika (Pty) Ltd
Head of private body and Information Officer	Rudesh Balvantrai Patel, Chief Executive Officer
Deputy Information Officer	None designated
Physical address	24 Brittany,18 Kent Road, Dunkeld West, Johannesburg, South Africa, 2196
Postal address	As above
Telephone	+27-(0)-82-305-2380
Email	info@rumika.co.za
Website	www.rumika.co.za

4. GUIDE ON HOW TO USE PAIA

The Regulator has published a guide, in each official language, that explains how to exercise any right under PAIA and POPIA (section 10 of PAIA). The guide contains, among other things, the objects of PAIA and POPIA, contact details of Information Officers, the procedure for making a request, available assistance and remedies, and the prescribed fees.

The guide is available on the Regulator's website. Members of the public may also inspect it, or request a copy using PAIA Form 1, from Rumika's Information Officer during normal business hours.

Information Regulator	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 (toll-free 0800 017 160)
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website and forms	https://inforegulator.org.za and https://inforegulator.org.za/paia-forms/

5. RECORDS AVAILABLE WITHOUT A REQUEST

No notice has been published in terms of section 52(2) of PAIA. The following records are, however, freely available without a formal request:

Record	How to obtain
Website content, company profile and published brochures	On the website or on request
Privacy Policy and Website Terms of Use	On the website
This PAIA Manual	On the website, at Rumika's offices, or by email on request
Public company information (name, registration number, directors)	From the Companies and Intellectual Property Commission (CIPC)

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Rumika keeps records in line with the following legislation, to the extent that it applies to Rumika's activities. Access is subject to PAIA and to the provisions of the relevant Act. This list is not exhaustive and does not mean that Rumika holds a licence or registration under any of these Acts.

Legislation	Typical records
Companies Act 71 of 2008	Memorandum of incorporation, registers of directors and securities, minutes, resolutions, annual financial statements
Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991	Tax returns, assessments, VAT records, invoices and supporting documents
Customs and Excise Act 91 of 1964	Import and export documents, customs declarations, bills of entry

Legislation	Typical records
Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998	Employment contracts, payroll and leave records, disciplinary records
Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002; Skills Development Levies Act 9 of 1999; Compensation for Occupational Injuries and Diseases Act 130 of 1993	Registrations, contributions and returns
Occupational Health and Safety Act 85 of 1993	Health and safety records, incident registers
Broad-Based Black Economic Empowerment Act 53 of 2003	B-BBEE certificates or affidavits and supporting records
Financial Intelligence Centre Act 38 of 2001 (where applicable)	Client identification and verification records
Electronic Communications and Transactions Act 25 of 2002	Website and electronic transaction records
Protection of Personal Information Act 4 of 2013	Records of processing, consents, data subject requests, operator agreements

7. SUBJECTS AND CATEGORIES OF RECORDS HELD

The table below describes the main subjects and categories of records held by Rumika. Not every category will exist at all times, and records may be held in paper or electronic form.

Subject	Categories of records
Corporate and governance	Incorporation documents, statutory registers, shareholder and board resolutions, minutes, policies, delegations of authority, CIPC filings

Subject	Categories of records
Finance and tax	Annual financial statements, management accounts, general ledger, budgets, bank statements, invoices, debtors and creditors records, tax and VAT records
Human resources	Employment and associate contracts, personnel files, payroll, leave records, CVs and recruitment records, training records
Rumika Consulting – clients and engagements	Enquiries, proposals, engagement letters, mandates, confidentiality agreements, working papers, models, reports and deliverables, correspondence
Rumika Industry – equipment and projects	Customer enquiries, quotations and pro-forma invoices, supply agreements, manufacturer and supplier price lists and specifications, factory acceptance and inspection reports, shipping and customs documents, installation and commissioning reports, warranty and service records
Commodity sourcing and trade facilitation	Mandates, agency and commission agreements, confidentiality agreements, counterparty verification files, product and inspection documents, logistics and port documentation
Suppliers and service providers	Supplier contracts, operator agreements, due diligence records, purchase orders
Marketing and communications	Website content, brochures, presentations, marketing consents and opt-out records
Information technology	IT policies, system access records, website logs, backup records, software licences
Legal and compliance	Contracts, legal opinions, litigation records, insurance policies, POPIA records, register of PAIA requests

8. HOW TO REQUEST ACCESS TO A RECORD

1. Complete PAIA Form 2 (Request for Access to Record), available on the Regulator's website or from the Information Officer.

2. Submit the form to the Information Officer by email, by hand or by post, using the details in section 3.
3. Provide enough detail to enable the Information Officer to identify the record(s) requested and the requester.
4. State the form in which you would like access (for example a copy, inspection or electronic copy) and your preferred language.
5. Identify the right you want to exercise or protect, and explain why the record is required for that purpose (section 53(2)(d) of PAIA).
6. If you are acting on behalf of someone else, provide proof of the capacity in which you are making the request.
7. Pay the request fee, if applicable (see section 9), and provide proof of payment.

If you are unable to read or write, or have a disability, you may make the request orally and the Information Officer will help you complete the form.

What happens next

- The Information Officer will decide on the request within 30 days of receiving it and will notify you of the outcome using PAIA Form 3.
- The 30-day period may be extended once by a further period of up to 30 days in the circumstances set out in section 57 of PAIA (for example where a large number of records must be searched). You will be notified in writing of any extension and your right to lodge a complaint about it.
- If the request concerns information about a third party, Rumika must take reasonable steps to notify that third party, who may make representations within 21 days, in line with sections 71 to 73 of PAIA.
- If the Information Officer does not respond within the required period, the request is regarded as refused (section 58 of PAIA).
- If access is granted, it will be given once any access fee has been paid.

PAIA does not apply to a record requested for criminal or civil proceedings once those proceedings have commenced, where the record can be obtained under the rules of court (section 7 of PAIA).

9. FEES

The fees below are prescribed in Annexure B of the PAIA Regulations for private bodies. Rumika may not charge more than the prescribed fees. If the prescribed fees are amended, the amended fees will apply.

Item	Fee
Request fee (payable by every requester other than a personal requester seeking their own personal information)	R140.00
Photocopy or printed copy of an A4 page	R2.00 per page
Copy on a flash drive or compact disc provided by the requester	R40.00
Copy on a flash drive or compact disc provided by Rumika	R60.00
Transcription of visual images	Quoted by service provider
Transcription of an audio record	R24.00 per A4 page
Search for and preparation of the record, for each hour or part of an hour after the first hour	R145.00
Maximum search and preparation fee per request	R435.00
Postage, email or other electronic transfer	Actual cost, if any

Where the search and preparation is expected to take more than six hours, a deposit of one third of the estimated access fee is payable before the search begins. If access is refused, the deposit will be refunded.

Payment details will be provided by the Information Officer. To avoid fraud, please confirm the banking details telephonically with Rumika before making any payment.

10. GROUNDS FOR REFUSAL OF ACCESS

Rumika may or must refuse access to a record on the grounds set out in Chapter 4 of Part 3 of PAIA, including where disclosure would involve:

- the unreasonable disclosure of personal information about a third party who is a natural person (section 63);
- commercial information of a third party, such as trade secrets or financial, commercial, scientific or technical information that would harm their commercial or financial interests (section 64);
- information supplied in confidence by a third party, where disclosure would breach a duty of confidence (section 65);
- endangering the life or physical safety of an individual, or the security of property or systems (section 66);
- records that are privileged from production in legal proceedings (section 67);
- Rumika's own trade secrets, or financial, commercial, scientific or technical information that would likely harm its commercial or financial interests, or prejudice it in contractual or other negotiations (section 68); or
- research information of Rumika or a third party, where disclosure would seriously disadvantage the researcher or the subject matter (section 69).

Despite these grounds, access must be granted where disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm (section 70). Where part of a record may be refused, the remainder will be disclosed if it can reasonably be severed (section 59).

11. REMEDIES

Rumika does not have an internal appeal procedure, as PAIA does not provide one for private bodies. If you are not satisfied with a decision of the Information Officer (including a refusal, the fees charged, an extension of time or the form of access), you may, within 180 days of being notified of the decision:

- lodge a complaint with the Information Regulator using PAIA Form 5 (section 77A of PAIA), sent to PAIAComplaints@inforegulator.org.za; or
- apply to a court with appropriate jurisdiction for relief (section 78 of PAIA).

12. PROCESSING OF PERSONAL INFORMATION

12.1 Purposes of processing

Rumika processes personal information to:

- respond to enquiries and prepare proposals, quotations and pro-forma invoices;
- conclude and carry out consulting engagements, equipment supply agreements and sourcing or trade facilitation mandates;
- verify and screen clients, suppliers and counterparties, and prevent fraud and corruption;
- arrange shipping, customs clearance, inspection, installation and commissioning;
- manage employees, associates and recruitment;
- keep financial, tax and statutory records;
- operate and secure its website and IT systems;
- send marketing to persons who have consented or are existing clients; and
- comply with the law and establish, exercise or defend legal claims.

12.2 Categories of data subjects and personal information

Data subjects	Categories of personal information
Clients and prospective clients (natural and juristic persons) and their representatives	Names, contact details, job titles, organisation details, enquiry and project information, contractual and payment records, verification documents
Suppliers, manufacturers, logistics providers and service providers	Company details, contact persons, contracts, banking details, B-BBEE and tax information, verification records
Commercial counterparties, investors, funders and referral partners	Company details, beneficial ownership, contact persons, mandates and agreements, due diligence and screening results
Employees, associates and job applicants	Identity and contact details, qualifications, employment history, remuneration, tax and banking details, references
Directors and shareholders of Rumika	Identity and contact details, statutory records

Data subjects	Categories of personal information
Website visitors	IP address, device and browser information, usage data, cookie preferences, details submitted in forms

12.3 Recipients of personal information

Personal information may be shared, on a need-to-know basis, with Rumika's staff and associates; operators such as hosting, email, cloud, IT and accounting providers; professional advisers; manufacturers, suppliers, freight forwarders, clearing agents and inspection agencies; banks; transaction counterparties (with the data subject's knowledge and, where appropriate, under confidentiality agreements); and regulators, SARS, courts and law enforcement where required by law. Rumika does not sell personal information.

12.4 Planned cross-border transfers

Because of the international nature of its work, Rumika transfers personal information to manufacturers, buyers, investors and service providers outside South Africa, including in China, India, the United Arab Emirates, the United Kingdom, the European Union and the United States, and uses cloud service providers that may store data abroad. Transfers take place only as permitted by section 72 of POPIA.

12.5 Security measures

Rumika applies appropriate technical and organisational measures in terms of section 19 of POPIA, including encrypted website connections, role-based access controls, multi-factor authentication on email and cloud systems, restricted sharing of transaction documents, confidentiality undertakings, backups, anti-malware protection, operator agreements and a procedure for notifying the Regulator and data subjects of security compromises in terms of section 22 of POPIA.

12.6 Data subject requests under POPIA

Data subjects may request confirmation of whether Rumika holds their personal information free of charge, and may request access to it using the procedure in this manual. Objections to processing may be made using Form 1, and requests for correction or deletion using Form 2, of the Regulations relating to the Protection of Personal Information, 2018. These forms should be

sent to the Information Officer. More information is available in Rumika's Privacy Policy.

13. AVAILABILITY AND UPDATING OF THIS MANUAL

This manual is available:

- on Rumika's website at www.rumika.co.za/paia
- for inspection at Rumika's principal place of business during normal business hours, free of charge; and
- on request from the Information Officer, on payment of the prescribed fee for copies, where applicable.

Rumika will review this manual at least once a year and update it whenever its contact details, records or processing activities change materially.

14. APPROVAL

Approved by	Rudesh Balvantrai Patel Chief Executive Officer and Information Officer Rumika (Pty) Ltd
Signature	
Date	06/11/2026