

Our **Innovation**  
Your **Intelligence**

# PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) - Manual

Version 4

8 April 2026

© This document and its contents are the property of GeoTerra Image (Pty) Ltd  
No part of this policy may be copied, reproduced, distributed, or disclosed—whether in electronic, mechanical, photocopying, recording, or any other form—without the prior written permission of GEOTERRAIMAGE Group of Companies. All rights reserved.



**GEOTERRA**  
IMAGE

<b>POLICY NAME</b>	<b>PROTECTION OF PERSONAL INFORMATION (PAIA) - Manual</b>		
<b>DOCUMENT ID</b>	<b>GO-8</b>		
<b>EFFECTIVE DATE</b>	08 April 2026	<b>DATE OF LAST REVISION</b>	8 April 2026
<b>ADMINISTRATOR RESPONSIBLE</b>	Elsa Van Zyl	<b>CONTACT INFORMATION</b>	Elsa.vanzyl@geoterraimage.com
<b>Applicable To:</b>	Employees and Management, Third Parties and Contractors, Partners and Affiliates		

<b>VERSION HISTORY</b>				
<b>VERSION</b>	<b>APPROVED BY</b>	<b>REVISION DATE</b>	<b>DESCRIPTION OF CHANGE</b>	<b>AUTHOR</b>
V1	Directors	1 April 2016	New	Alet Henning
V2	Directors	19 August 2025	Revision	Alet Henning
V3	Dr. Corné Elof	5 September 2025	Align with ISO9001 Policy Structure	Elsa Van Zyl
V4	Dr. Corné Elof	8 April 2026	Align with ISO9001 Policy Structure	Elsa Van Zyl

<b>APPROVAL AND REVIEW</b>
The <b>GEOTERRAIMAGE</b> POPIA Manual is regularly reviewed in line with legislation by our Deputy Information Officer and approved by our Information Officer and Executive Management. This process ensures that the policy remains current, effective, and backed by top-level commitment to security and compliance.

<b>COMPANY OVERVIEW</b>
<p><b>GeoTerralmage Group of companies:</b> GeoTerra Image (Pty) Ltd, GeoTerralmage Holdings (Pty)LTD, GeoTerralmage SA (Pty) Ltd (GTI-SA), GeoTerralmage Education NPC, and, in addition, as its European incorporated company GEOTIPT INTERNATIONAL, UNIPESSOAL LDA (GeoTerra360).</p> <p><i>Hereafter referred to as "The Group"</i></p> <p><i>"The Group" is a well-regarded organisation, recognised for its strong commitment to regulatory compliance. It has earned a reputable standing among clients and competitors alike by consistently conducting its business in line with high moral, ethical, and legal standards. "The Group" remains firmly committed to ethical and transparent business practices, actively upholding this commitment through the implementation and enforcement of comprehensive corporate governance frameworks, internal controls, and codes of conduct that guide all employees and stakeholders in their professional responsibilities.</i></p>

## CONTACT DETAILS

**Physical address:** 477 Witherite Street, The Willows, Pretoria, 0184.

**Postal address:** PO Box 295, Perseuorpark, Pretoria 0001.

**Telephone number:** 012 807 9480.

**The Information Officer is Dr. Corné Eloff:**

Email address: [corne.eloff@geoterraimage.com](mailto:corne.eloff@geoterraimage.com)

**The Deputy Information Officer is Alet Henning:**

Email address: [alet.henning@geoterraimage.com](mailto:alet.henning@geoterraimage.com)

Website: <https://www.geoterraimage.com/>

## PURPOSE

MANUAL in terms of Section 51 of the Promotion of Access to Information Act No. 2 of 2000 ("Act")

The purpose of this Plan is to set out **GEOTERRAIMAGE's** approach to complying with the Protection of Personal Information Act (POPIA), ensuring lawful, fair, and responsible processing of personal information. This Plan provides a framework for safeguarding personal information, maintaining accountability, and building trust with stakeholders.

## SCOPE

This Plan applies to all personal information processed by **GEOTERRAIMAGE**, including information related to employees, clients, service providers, suppliers, and any other third parties. It covers all business units, subsidiaries, and operations in South Africa where personal information is collected, stored, used, shared, or disposed of.

- This manual does not create any right or entitlement to receive access to any information held by **GEOTERRAIMAGE**.
- This manual is not intended to deal comprehensively with every aspect of and procedure provided for in the Act.
- This manual is subject to change and may be amended from time to time, in **GEOTERRAIMAGE's** discretion.

## THE ACT

The Act grants a requester access to records of a private body if the record is required for the exercise or protection of any rights, subject to certain requirements or limitations. If a public body lodges a request, the public body must be acting in the public interest.

Requesters are referred to the Guide in terms of section 10 of the Act which has been compiled by the Information Regulator, which contains information for the purposes of exercising rights. The Guide is available from the Information Regulator and on its website. A copy is available from the Company, upon request.

The details of the Information Regulator are:

Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

Tel: 010 023 5200

Email: [enquiries@info regulator.org.za](mailto:enquiries@info regulator.org.za)

Website: <https://info regulator.org.za/>

### LATEST SECTION 52(2) NOTICE

At this stage, a notice on the categories of records that are automatically available without a person having to request access in terms of the Act has not been published

## LEGISLATION

To the extent applicable, **GEOTERRAIMAGE** may keep records as required in accordance with the following legislation (not an exclusive list):

Reference	Name
71 of 2008	Companies Act
58 of 1962	Income Tax Act
66 of 1995	Labour Relations Act
89 of 1991	Value Added Tax Act
75 of 1997	Basic Conditions of Employment Act
28 of 2011	Tax Administration Act
55 of 1998	Employment Equity Act
63 of 2001	Unemployment Insurance Act
26 of 2005	Auditing Profession Act

To the extent applicable, certain information may be available in terms of the provisions of the above legislation.

### RECORDS PUBLICLY AVAILABLE

Some of our statutory records are available for inspection, without the need for a request under the Act, at <https://www.bizportal.gov.za/>

These may include:

- Memorandum of Incorporation;
- Directors' names.

In addition, some of our marketing brochures and publications may be available on our website.

## RECORDS HELD

The following is a non-exclusive list of categories and subjects on which the Company holds records. These may be held for the Company to function effectively and/or to comply with the law:

### Company Secretarial:

- Memorandum of Incorporation
- Rules
- Certificate of Incorporation
- Minutes and resolutions
- Annual returns

### Finance:

- Financial statements
- Tax records

### Personnel/Human Resources:

- Employment contracts
- Internal policies and procedures
- Staff records

Legal: Various contracts and records

Marketing and Public Relations: Brochures and publications

General: Insurance records & Correspondence

## APPLICABLE LAWS

### PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013 (POPIA)

The following relates to the POPIA, as required in terms of section 51(1)(c) of the Act. Please refer to the Company's privacy policy, available on its website or on request, for more information related to POPIA.

The Company processes personal information for a number of reasons, including (but not limited to) the following:

- To perform its services;
- For employment and recruitment purposes;
- To maintain its records;
- To comply with its legal obligations; and
- Generally, pursuant to any other lawful purpose.

Categories of Data Subjects and Information:

- Clients and potential clients: Personal information required to perform services, to comply with the law and pursuant to any other legitimate purpose;
- Suppliers, consultants and third-party contractors: Personal information required for the performance of any contract, to comply with the law and pursuant to any other legitimate purpose;
- Employees: Personal information required in terms of the relationship between employer and employee, including (but not limited to) financial information, employment history, special personal information such as race, gender and health, to comply with any law and pursuant to any other legitimate purpose;
- Job applicants: Personal information required to effectively recruit employees, such as CV and background checks, to comply with any law and pursuant to any other legitimate purpose;
- Visitors: Personal information required to comply with any law and pursuant to any other legitimate purpose.

Personal information may be supplied to the following recipients pursuant to any of the reasons described in clause 8.1 above (this is not an exclusive list):

- The Company's directors, officers, employees, agents, consultants, and third-party contractors engaged by the Company.
- Any third party as required by law or regulation, or pursuant to a lawful basis.
- Transborder flows of personal information will be dealt with in accordance with POPIA and our privacy policy.

Information Security Measures:

- Reasonable technical, organisational and contractual measures will be implemented and monitored for the protection of personal information processed by the Company.
- 

## HOW TO REQUEST

Requests for access to records held by the Company must be made by the requester using the prescribed form (Form 02: Request for Access to Record).

This form is available on the Information Regulator's website at <https://inforegulator.org.za/paia-forms/> or on our website.

The prescribed form and request must be submitted to the Information Officer using the details herein. In lodging the request, the requester must:

- Provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester;
- Indicate which form of access is required and specify a postal address, fax number and/or email address within the Republic;
- Indicate whether, in addition to a written response, the requester requests to be informed in any other manner and state the necessary particulars thereof;
- Identify the right that the requester is seeking to exercise or protect and provide an explanation of the reason the record is required to exercise or protect such right.

If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request, to the satisfaction of the Information Officer.

The Company, as soon as is reasonably practicable after the request has been received, will respond to the request and will decide whether or not to grant the request.

**PRESCRIBED FEES IN TERMS OF THE ACT**

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on:	
	Flash drive (to be provided by requestor)	R40.00
	Compact disc	
	If provided by requestor	R40.00
	If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced.
6.	Copy of visual images	Will depend on quotation from Service provider.
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	Flash drive (to be provided by requestor)	R40.00
	Compact disc	
	If provided by requestor	R40.00
	If provided to the requestor	R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00
	To not exceed a total cost of	R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any.

Note: Fees are subject to change. Accuracy cannot be guaranteed. Up-to-date fees can be obtained from Information Regulator.

**ROLES AND RESPONSIBILITIES**

ROLE	RESPONSIBILITY
OPERATIONS MANAGER	Maintain and develop POPIA policies and procedures.
INFORMATION OFFICER	Ensures compliance with POPIA and reports concerns. Acts as liaison with the Information Regulator
DEPUTY INFORMATION OFFICER	Supports the Information Officer with POPIA compliance and reports concerns
EMPLOYEES AND CONTRACTORS	Follow internal procedures for handling personal information
BOARD OF DIRECTORS	Monitor the effectiveness and review the implementation of this policy. Provide oversight, resources, and governance to enforce compliance.

**APPROVAL SIGNATURES**

TITLE	NAME	EMAIL
CEO	Corné Eloff	corne.eloff@geoterraimage.com
SIGNATURE		