

	Quality - PAIA Manual COMPANY PROCEDURE Quality Management System Owner & Approver – Group COO & Group CEO	Unique No: QM-POL-05
		Rev. No: 4
		Effective Date: 08/06/2026
		Review Date: 08/06/2026

LIGHTWARE OPTOELECTRONICS (PTY) LTD

PAIA MANUAL

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

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This manual has been prepared in terms of the section 51 of the Promotion of Access to Information Act 2 of 2000 and to address the requirements of the Protection of Personal Information Act 4 of 2013 as required under South African laws.

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1 Definitions

Term	Definition
CEO	Chief Executive Officer
Client	Any natural or juristic person that received or receives services from the company
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 the company 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

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

Any other terms not described herein will have the meaning as ascribed to it in terms of the Promotion of Access to Information Act 2 of 2000. Additionally, all reference to LightWare shall extend to its subsidiaries.

2 Purpose of the PAIA Manual

This Manual is applicable to LightWare Optoelectronics (Pty) Ltd ("LightWare") and which for the purpose of the Protection of Personal Information Act 4 of 2013 and the Promotion of Access to Information Act 2 of 2000, is defined as a private body.

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.

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- 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 LightWare

3.1 Chief Information Officer

Name	Nadia Nilsen
Contact number	+27-12-942-0408
Email address	info@lightwarelidar.com

3.2 Deputy Information Officer

Name	Anneke Grond
Contact number	+27-12-942-0408
Email address	info@lightwarelidar.com

3.3 General contacts for access to information

Email address	popi@lightwarelidar.com
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3.4 National or head office

Company	2016/138232/07
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registration number	
Postal address	1 st floor, Tugela House, Riverside Office Park, 1303 Heuwel road, Centurion Central, Gauteng, 0157, Republic of South Africa
Physical address	1 st floor, Tugela House, Riverside Office Park, 1303 Heuwel road, Centurion Central, Gauteng, 0157, Republic of South Africa
Contact number	+27 12 942 0408
Email	popi@lightwarelidar.com
Website	https://lightwarelidar.com

3.5 Subsidiaries and affiliates:

Company name	LightWare LiDAR Inc.
Company registration number	Incorporated in Delaware
Registered Address	600 17th Street, Suite 2800 South, Denver, Colorado, 80202, United States of America
Information Officer	Nadia Nilsen
Email	info@lightwarelidar.com
Contact number	+27-12-942-0408

4 Guide on how to use the 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 on request 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

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- 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 POPIA¹;
- 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 11².
- 4.3.3.2 Access to a record of a private body contemplated in section 50³.
- 4.3.3.3 An internal appeal.
- 4.3.3.4 A complaint to the Regulator.
- 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 14⁴ and 51⁵ 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 15⁶ and 52⁷ 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 22⁸ and 54⁹ regarding fees to be paid in relation to requests for access;

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 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.

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- 4.3.7 The regulations made in terms of section 92¹⁰;
- 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 the company's offices during ordinary working hours.

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.

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- 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 LightWare 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	LightWare current PAIA Manual	X	X
Company overview	Company profile, business activities, LiDAR technology solutions, autonomy and robotics applications, drone sensing solutions, product innovation information, contact details	X	X
Product information and technical resources	Product brochures, LiDAR sensor specifications, user manuals, technical datasheets, integration guides, application notes, SDK/API documentation	X	X
Policies (public-facing)	Privacy policy, website cookies policy, terms of website use	X	X
Legal disclosures	Disclaimers, warranty terms, terms and conditions of sale, export control notices, consumer notices, intellectual property notices	X	X
News and announcements	Product launches, technology updates, press releases, media publications, company	X	X

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Category of Records	Types of the Record	Available on Website	Available on Request
	announcements, innovation updates, event participation		
Public marketing materials	Marketing brochures, videos, product application examples, trade show materials, product demonstration content	X	X
Research and development publications	Public-facing whitepapers, technology articles, product testing summaries, innovation publications, engineering insights	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
Public supplier or compliance information (if applicable)	Supplier onboarding documentation, compliance certifications, accreditation records, quality assurance certifications	-	X
Career opportunities	Vacancies, recruitment notices, internship opportunities, employment application information	-	X
Website and customer support information	Customer support contact details, FAQs, service and repair procedures, software update notices	X	X
Corporate governance information	Company registration details, corporate contact information, governance disclosures (where publicly available)	X	X
Contact information for IO	Name, designation, email address, telephone number, physical address	X	X

7.2 Description of the records/subjects 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, shareholder records, governance documentation	Companies Act, 71 of 2008	Legal and Compliance

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Category of Records	Applicable Legislation	Department/ Subject Area
Financial Statements, Accounting Records, Transactional Data	Companies Act, 71 of 2008	Finance
Employment contracts, payroll records, attendance registers, leave records, employee benefits records	Basic Conditions of Employment Act, 75 of 1997	Human Resources (HR)
Disciplinary records, grievance procedures, union agreements, Commission for Conciliation, Mediation and Arbitration (CCMA) documentation	Labour Relations Act, 66 of 1995	HR
Employment Equity (EE) plans, EE reports, committee meeting minutes	Employment Equity Act, 55 of 1998	HR
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	HR
Unemployment Insurance Fund (UIF) contribution records, declarations, employee benefit claim records	Unemployment Insurance Act, 63 of 2001	HR
Health and safety audits, incident reports, risk assessments, safety committee records	Occupational Health and Safety Act, 85 of 1993	Occupational Health and Safety
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	Occupational Health and Safety
Client contracts, complaint records, marketing disclaimers, product/ service terms and conditions	Consumer Protection Act, 68 of 2008	Technical Support / Marketing
Data subject consent forms, privacy notices, PAIA Manual, operator agreements, processing activity records	Protection of Personal Information Act, 4 of 2013	Legal and Compliance

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Category of Records	Applicable Legislation	Department/ Subject Area
PAIA Manual, access request logs, training records	Promotion of Access to Information Act, 2 of 2000	Legal and Compliance
Cybersecurity records, access logs, network monitoring reports, backup and disaster recovery records	Cybercrimes Act, 19 of 2020	Information Technology (IT)
Electronic communications policies, e-signature consents, website terms and conditions	Electronic Communications and Transactions Act, 25 of 2002	Information Technology (IT)
Product development documentation, engineering specifications, technical drawings, firmware/software development records	Copyright Act, 98 of 1978 and Patents Act, 57 of 1978	Engineering
Trademark registrations, intellectual property records, branding documentation	Trademarks Act, 194 of 1993	Marketing
Product certification records, compliance testing documentation, quality assurance records, manufacturing standards documentation	National Regulator for Compulsory Specifications Act, 5 of 2008 (where applicable)	Quality Assurance / Production / Supply Chain
Import and export documentation, customs declarations, international shipping records	Customs and Excise Act, 91 of 1964	Supply Chain / Finance
Supplier contracts, procurement records, inventory records, import/export logistics documentation	Electronic Communications Act, 36 of 2005 and related commercial legislation	Supply Chain / Operations
Visitor access registers, security incident reports	Private Security Industry Regulation Act, 56 of 2001 (where applicable)	Security
Research collaboration agreements, technical publications, innovation records, product testing records	Intellectual Property Laws Amendment Act, 38 of 1997	Engineering
Environmental compliance records, hazardous material handling records, waste disposal documentation (if applicable)	National Environmental Management Act, 107 of 1998	Operations / Compliance

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Category of Records	Applicable Legislation	Department/ Subject Area
Document retention and disposal schedules, archive logs	National Archives and Records Service Act, 43 of 1996	Quality

**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.*

- 7.3 The company holds and/or processes the following records for the purposes of PAIA and POPIA:
- 7.3.1 PAIA: PAIA Manual; PAIA records; PAIA submission records; awareness training.
- 7.3.2 POPIA: Including, but not limited to, the following: IO Registration Certificate; data breach records; retention records; awareness training.
- 7.3.3 Further information which may be made available upon request.
- 7.4 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 2 of PAIA Forms (Request for Access to Record) herein, is attached hereto 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:

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- 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 the company 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) herein. 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, they 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.

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- 8.12 Form 2 of POPIA Forms (Request for Correction or Deletion) herein, 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) herein 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) herein 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) herein 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 LightWare 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

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- 9.2.3 Information disclosed in confidence by a third party to the company, 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 the company, 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 the company;
- 9.6.3 Information which, if disclosed, could put the company at a disadvantage in contractual or other negotiations or prejudice the company in commercial competition; and/or
- 9.6.4 Computer programs which are owned by the company, and which are protected by copyright and intellectual property laws.
- 9.7 Research information of the company 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 the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.
- 10.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

11 Fees

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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 the company)	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 the company)	R60.00 once-off
Search and preparation fee (excluding the first hour reasonably required)	R145.00 per hour or part thereof, excluding the first hour reasonably required, subject to a maximum fee of R435.00 per request.
Maximum search and preparation fee per request	R435.00 per request (maximum total search and preparation fee).
Postage, email or any other electronic transfer	Actual expense, if any

12 Processing of personal information

LightWare operates in the technology and manufacturing industry and specialises in the design, development, manufacture, distribution, support, and integration of LiDAR (Light Detection and Ranging) sensors and related technologies for use in autonomy, robotics, drones, industrial automation, mapping, navigation, and precision measurement applications.

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- 12.1 The purposes for processing personal information include
- 12.1.1. To respond to enquiries, product support requests, technical support queries, complaints, warranty claims, and service-related requests.
 - 12.1.2. To process quotations, sales orders, invoicing, billing, payments, reconciliations, refunds, and financial transactions relating to products and services rendered.
 - 12.1.3. To manufacture, assemble, configure, test, distribute, repair, maintain, and support LiDAR sensors, laser rangefinders, and related technology products.
 - 12.1.4. To communicate with clients, distributors, suppliers, resellers, logistics providers, service providers, and business partners regarding products, orders, technical support, repairs, software updates, and operational matters.
 - 12.1.5. To verify identities, perform security checks, manage access control, and maintain the security and integrity of company premises, systems, devices, intellectual property, and confidential information.
 - 12.1.6. To conduct research and development activities, product testing, engineering analysis, innovation projects, quality assurance processes, and product improvement initiatives.
 - 12.1.7. To maintain product certification records, compliance documentation, calibration records, and quality management system records.
 - 12.1.8. To facilitate local and international shipping, customs clearance, import/export activities, logistics coordination, and supply chain management.
 - 12.1.9. To manage employment relationships, recruitment processes, payroll administration, employee benefits, training, occupational health and safety obligations, and workforce management.
 - 12.1.10. To manage supplier onboarding, procurement processes, contractor management, due diligence assessments, and vendor relationships.
 - 12.1.11. To monitor and maintain information technology systems, software platforms, cloud-based services, cybersecurity infrastructure, and network security.

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- 12.1.12. To monitor and record electronic communications, support tickets, and system activity for quality assurance, training, security monitoring, fraud prevention, and dispute resolution purposes.
- 12.1.13. To conduct customer satisfaction surveys, marketing campaigns, product awareness initiatives, newsletter communications, and promotional activities relating to the company's products and services.
- 12.1.14. To comply with legal, regulatory, contractual, taxation, export control, customs, employment, health and safety, and corporate governance obligations applicable to the company.
- 12.1.15. To investigate incidents, disputes, complaints, security breaches, warranty matters, or legal claims and to exercise or defend legal rights.
- 12.1.16. To maintain records required for audit purposes, corporate governance, business continuity, disaster recovery, and risk management processes.
- 12.1.17. To facilitate transborder business operations, international distribution arrangements, and support relationships with subsidiaries, partners, resellers, and service providers located outside the Republic of South Africa.
- 12.1.18. To process personal information for any additional purpose that is directly related to the company's operational activities, products, services, or legal obligations, where such processing is permitted or required by applicable law.
- 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	Full names, company names, registration numbers, identity numbers, billing information, delivery addresses, contact details, banking details, VAT numbers, purchase history, warranty information, technical support records, product registration information, communications records.
Distributors / Resellers	Company registration details, contact person information, banking details, tax information, distribution agreements, sales records, logistics information, import/export documentation.
Suppliers / Service Providers	Company names, registration numbers, VAT numbers, addresses, banking details, contact details, procurement

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	records, contracts, compliance documentation, confidentiality agreements, trade-related information.
Employees	Name, surname, identity number, passport number (if applicable), tax number, contact details, residential address, banking details, employment contracts, payroll records, leave records, disciplinary records, performance reviews, qualifications, training records, health and safety records, biometric or access control data (if applicable), race and gender information for Employment Equity purposes.
Job Applicants / Candidates	Full names, contact details, CVs, qualifications, employment history, references, interview notes, background screening results, criminal or credit checks (where applicable and lawful), identity documentation.
Contractors / Consultants / Freelancers	Full name, identity number, contact details, tax information, banking details, contracts, qualifications, project records, timesheets, access control records.
Website Users / Online Customers	IP addresses, cookies, browsing activity, website usage analytics, online enquiry information, device identifiers, user account information, email addresses, communication preferences
Research and Development Partners	Contact details, technical collaboration information, project documentation, communications records, agreements, intellectual property-related information
Visitors / Guests	Name, contact details, company name, visitor logs, vehicle registration details, access control records.
Regulatory Bodies / Authorities	Contact person details, regulatory correspondence, compliance submissions, registration documentation, audit records.
Shareholders / Investors / Directors	Identity numbers, contact details, shareholding information, banking details, investment records, governance documentation, statutory disclosures.
Logistics / Shipping Contacts	Delivery addresses, customs documentation, import/export records, contact details, shipment tracking information.
IT / System Users	Login credentials, usernames, passwords (encrypted where applicable), access logs, network activity records, device information, IP addresses, cybersecurity monitoring records, authentication data.
Marketing / Newsletter Subscribers	Full names, contact details, email addresses, communication preferences, consent records, marketing interaction history.
Training Participants	Attendance registers, training records, certificates, assessment results, acknowledgement forms.

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Information Officers / Deputy Information Officers	Identity information, appointment documentation, registration records, contact details, training records, regulatory correspondence.
Business Partners / Affiliates	Contact details, contractual records, communication records, compliance information, operational information relating to collaborative projects.
Security Monitoring Subjects	Access control records, security incident records, visitor logs, vehicle registration information
Data Subjects submitting PAIA or POPIA requests	Identity information, contact details, request documentation, correspondence records, proof of identity, objection or correction requests

The categories of personal information processed by LightWare are dependent on the nature of the services rendered, operational requirements, contractual obligations, legal requirements, and the specific relationship between the data subject and the company. Personal information is processed in accordance with applicable data protection and access to information legislation.

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
Identity numbers, names, and background verification information	South African Police Service (SAPS), accredited background screening and verification service providers
Qualifications, certifications, and professional credentials	South African Qualifications Authority (SAQA), Manufacturing, Engineering and Related Services Sector Education and Training Authority (merSETA), educational institutions, accreditation bodies
Credit and payment information	Financial institutions, banks, payment processors, credit bureaus, auditors
Employment records, references, and recruitment information	Recruitment agencies, previous employers, background screening service providers
Payroll and employee tax information	South African Revenue Service (SARS), payroll administrators, employee benefit providers
Banking details and financial records	Banking institutions, payment service providers, auditors, accounting service providers

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Occupational health and safety records	Occupational health practitioners, medical professionals, compensation authorities, health and safety consultants
Product delivery information, shipping records, customs documentation, import/export records	Courier companies, freight forwarders, logistics providers, customs authorities, SARS Customs Division, international customs and border authorities
Security clearance information (for restricted access areas)	Suppliers, procurement service providers, legal advisors, auditors
Product registration information, warranty claims, technical support records	Authorised distributors, resellers, repair centres, technical support providers, warranty administration providers
Technical and system information, cloud-based records, cybersecurity logs	Cloud service providers, IT service providers, cybersecurity consultants, managed service providers
Website user information, cookies, analytics information	Website hosting providers, analytics providers, digital marketing service providers
Visitor records, access control records	Authorised security service providers, security monitoring companies, law enforcement authorities where legally required
Skills development, training, and employee development records	Sector Education and Training Authorities (SETAs), training providers, certification bodies
Regulatory compliance records, governance documentation, statutory submissions	Information Regulator, Companies and Intellectual Property Commission (CIPC), South African Revenue Service (SARS), Department of Employment and Labour, foreign tax authorities (where legally required), regulatory authorities
Marketing and communication information	Marketing agencies, email communication platforms, customer relationship management (CRM) providers
Research and development information, collaboration records	Research partners, authorised technology partners, testing laboratories, certification bodies, engineering consultants
Information required for legal proceedings, investigations, or dispute resolution	Legal advisors, attorneys, advocates, courts, regulatory bodies, dispute resolution forums
Employee benefit and insurance information	Pension fund administrators, insurers, medical aid providers, employee wellness service providers
Access control and authentication records	Security providers, IT administrators, authentication service providers

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Information Officer and compliance-related records	Information Regulator, compliance consultants, legal advisors, authorised auditors
International business and distributor information	International subsidiaries, authorised distributors, resellers, logistics partners, foreign regulatory authorities (where legally required), foreign tax authorities (where legally required), and cross-border service providers, subject to applicable data protection requirements.

Personal information may also be disclosed where required by law, court order, contractual obligation, regulatory requirement, or where disclosure is necessary for the legitimate operational requirements of LightWare, in accordance with applicable data protection and access to information legislation.

14 Planned transborder flows of personal information

LightWare may transfer, access, process, or store certain categories of personal information outside the Republic of South Africa through the use of international business operations, cloud-based systems, software platforms, technical support services, distributors, logistics providers, communication platforms, and third-party service providers utilised in the ordinary course of business operations.

As a technology and manufacturing company operating within the global LiDAR, robotics, drone, and autonomy industries, certain operational, technical, customer support, logistics, and information technology functions may involve transborder flows of personal information. Such transfers may occur where necessary for legitimate business operations, contractual performance, technical support, product distribution, cloud hosting, cybersecurity, communications, or legal and regulatory obligations.

The country in which personal information will be stored
South Africa - Employee information, customer information, supplier records, operational records, financial records, compliance documentation
United States of America - Cloud-hosted information, website analytics, technical support records, CRM records, marketing platform information, IT system and cybersecurity records
European Union Member States - Cloud storage, software hosting services, communications platforms, customer support systems, operational and technical records
United Kingdom - Business communications, customer and supplier relationship management records, cloud-based collaboration tools

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International jurisdictions utilised by authorised cloud and software providers - User account information, authentication data, system logs, electronic communications, support ticket information

Countries where international distributors, subsidiaries, resellers, or logistics providers operate - Customer contact details, shipping information, customs/import-export documentation, product support records

- 14.1 The Company 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. General description of information security measures to ensure the confidentiality, integrity and availability of the information:
- 14.1.1 Keeping our systems secure through access controls, system monitoring, and usage tracking;
 - 14.1.2 Storing physical and digital records in secure, access-controlled environments;
 - 14.1.3 Restricting access to buildings, systems, and records to authorised personnel only;
 - 14.1.4 Securely destroying or deleting personal information once it is no longer required;
 - 14.1.5 Ensuring compliance with relevant data protection standards, legal requirements, and industry codes of conduct.
- 14.2 In addition, the following technical security safeguards have been implemented to support these-objectives:
- 14.2.1 Data encryption (at rest and in transit) to protect sensitive information from unauthorised access;
 - 14.2.2 Anti-virus and anti-malware software to detect, prevent, and mitigate cyber threats;
 - 14.2.3 Firewalls and intrusion detection/prevention systems (IDS/IPS) to monitor and safeguard network traffic;
 - 14.2.4 Multi-factor authentication (MFA) and role-based access controls to limit access based on job function and business need;
 - 14.2.5 Secure backup and disaster recovery solutions to ensure business continuity and data integrity;
 - 14.2.6 Ongoing system monitoring and access logging to detect and respond to suspicious activity;

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- 14.2.7 Physical security controls such as keycard access, secure storage, and visitor management procedures;
- 14.2.8 Employee training and awareness programmes to promote secure data handling and prevent human error;
- 14.2.9 Secure disposal of physical and electronic records when no longer needed or when required by law.
- 14.2.10 These safeguards are continuously reviewed and enhanced to address new risks, changing business processes, and advancements in technology.

15 Availability of the Manual

- 15.1 A copy of the manual is available:
 - 15.1.1 On www.lightwarelidar.com or at any head office of LightWare 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 herein, 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.

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- 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 sub-regulation 12.11.2 or a request for the destruction or deletion of a record of personal information, as referred to in sub-regulation 12.11.3 must be submitted to a responsible party on a form which is substantially similar to Form 2 of POPIA Forms herein 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.

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- 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 sub-regulation 12.11.2 or 12.11.3, notify a data subject, in writing, of the action taken as a result of the request

18 Updating of the Manual

The head of LightWare will update this manual on a regular basis.

Name of IO	Nadia Nilsen
Title of the head of the body	Chief Executive Officer

Applicable forms

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 of 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](#)