CLICKS GROUP

LIMITED

REG. NO. 1996/000645/06

THE CLICKS GROUP

PAIA MANUAL

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

DATE OF COMPILATION: MAY 2024

DATE OF REVISION: NOVEMBER 2026

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	"Clicks Group Limited"	shall mean Clicks Group Limited, and its subsidiaries. Clicks Group subsidiaries include 180 Degrees Services (Pty) Ltd, H Mallach and Associates (Pty) Ltd, Clicks Investments (Pty) Ltd, K2021423995 (South Africa) (Pty) Ltd, New Clicks South Africa (Pty) Ltd, Clicks Retailers (Pty) Ltd, Clicks Centurion (Pty) Ltd, Sorbet Holdings (Pty) Ltd and 180 Degrees Marketing (Pty) Ltd. UPD and The Body Shop are divisions of New Clicks South Africa. Clicks Group Limited is a holding company and is listed on The JSE Limited. It also administers the Clicks Group Retirement Fund, Clicks Group Negotiated Pension Fund and Clicks Group Negotiated Provident Fund. Clicks Group Limited is a private body as defined in PAIA.
1.2	"this Manual"	this PAIA Manual, including its annexures, as amended from time to time
1.3	"PAIA"	Promotion of Access to Information Act 2 of 2000 (as amended)
1.4	"POPIA"	Protection of Personal Information Act No.4 of 2013
1.5	"Regulator"	Information Regulator
1.6	"Republic"	Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This Manual is intended to assist members of 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 Information Officer and Deputy Information Officer who will assist the public with the records 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 description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 know if the body has planned to transfer or process personal information outside the Republic and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10 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 CLICKS GROUP LIMITED

Name	:	Clicks Group Limited
Registration Number	:	1996/000645/06
Head Office Registered Address	:	Cnr. Searle & Pontac Streets, Cape Town, 8001
Postal Address	:	P.O. Box 5142, Cape Town, 8000
Telephone Number	:	+27 (0)21 460 1911
Fax Number	:	+27 (0)21 460 1805
Head/Chief Executive Officer	:	Bertina Engelbrecht
Designated Information Officer	:	Ross Forgan
Designated Deputy Information Officer	:	Ilze Luttig Hattingh
Email Address of Information Officer	:	popia@clicksgroup.co.za
Website	:	http://www.clicksgroup.co.za; www.clicks.co.za

Name	Clicks Negotiated Provident Fund
Registration number	12/8/25816
Name	Clicks Negotiated Pension Fund
Registration number	12/8/25815
Name	Clicks Group Retirement Fund
Registration number	12/8/9883/2
Information Officer:	Sunilduth Harilall
Street Address:	Cnr. Searle & Pontac Streets, Cape Town, 8001
Postal Address:	P.O. Box 5142, Cape Town, 8000
Telephone:	+27 (0)21 460 1911
Fax Number:	+27 (0)21 460 1805
E-mail:	principalofficer@clicksgroup.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

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

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

4.3 The aforesaid Guide contains the description of

4.3.1 The objects of PAIA and POPIA;

4.3.2 The postal and street address, phone and fax number, and if available, electronic mail address of:

4.3.2.1 The Information Officer of every public body; and

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

4.3.3 The manner and form of request for

4.3.3.1 Access to a record of a public body contemplated in section 11 of PAIA; and

4.3.3.2 Access to a record of a private body contemplated in section 50 of PAIA.

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

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

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

4.3.6.1 An internal appeal;

4.3.6.2 A complaint to the Regulator

4.3.6.3 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;

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

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

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

4.3.10 The regulations made in terms of section 92.

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

4.5 The Guide can also be obtained

4.5.1 Upon request to the Information Officer;

4.5.2 From the website of the Regulator (https://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 isiXhosa

4.6.3 isiZulu

5. CATEGORIES OF RECORDS OF CLICKS GROUP LIMITED WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following records are generally available without a formal PAIA request, subject to applicable law and any access controls: information published on the Clicks Group and Clicks websites; annual and interim reports; SENS announcements; shareholder notices and circulars; corporate governance documents; policies and statements published for external use; product, service, store and promotional information; career opportunities; and other records that Clicks Group Limited elects to make publicly available.

Publicly available records may be accessed at www.clicksgroup.co.za and www.clicks.co.za. The availability of a record on a website does not mean that all related or underlying records are automatically available.

6. DESCRIPTION OF THE RECORDS OF CLICKS GROUP LIMITED WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Records are kept in accordance with legislation applicable to Clicks Group Limited, including the legislation listed below, as amended from time to time. This list is not exhaustive, and the inclusion of legislation does not imply that every record is available under PAIA.

Category of Records	Applicable Legislation
PAIA Manual, PAIA Requests, PAIA Register and Access to Information Records	Promotion of Access to Information Act 2 of 2000
Records containing Personal Information and Special Personal Information	Protection of Personal Information Act 4 of 2013
Health Records, Patient Records, Clinical Notes, Prescriptions, Referrals and Healthcare Information	National Health Act 61 of 2003; HPCSA Guidelines on the Keeping of Patient Records; Protection of Personal Information Act 4 of 2013
Company registration documents, Memorandum of Incorporation, Incorporation Records and Corporate Governance Records	Companies Act 71 of 2008
Statutory Registers including Registers of Members, Directors, Officers, Mortgages,	Companies Act 71 of 2008

Category of Records	Applicable Legislation
Debentures and Shareholdings	
Board Minutes, Committee Minutes, Shareholder Resolutions and Corporate Secretarial Records	Companies Act 71 of 2008
Financial Statements, Accounting Records, Books of Account, Ledgers, Journals and Supporting Schedules	Companies Act 71 of 2008; Tax Administration Act 28 of 2011
Income Tax Records, Tax Returns, Assessments and Related Tax Documentation	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011
VAT Records, Tax Invoices, Credit Notes, Debit Notes and VAT Documentation	Value Added Tax Act 89 of 1991
Customs, Shipping and Import / Export Documentation	Customs and Excise Act 91 of 1964
Supplier Records, Commercial Contracts, Guarantees, Indemnities and Licence Agreements	Companies Act 71 of 2008; Prescription Act 68 of 1969
Employee Records, Personnel Files, Payroll Records and Remuneration Records	Basic Conditions of Employment Act 75 of 1997
Collective Agreements, Labour Disputes, Arbitration Awards and Industrial Relations Records	Labour Relations Act 66 of 1995
Employment Equity Plans, Workforce Profiles and Employment Equity Reporting Records	Employment Equity Act 55 of 1998
Unemployment Insurance Contribution Records	Unemployment Insurance Act 63 of 2002
Occupational Health and Safety Records and Workplace Health Records	Occupational Health and Safety Act 85 of 1993
Workmen's Compensation and Occupational Injury Records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Pension Fund, Provident Fund and Retirement Fund Records	Pension Funds Act 24 of 1956
Financial Intelligence and Client Verification Records	Financial Intelligence Centre Act 38 of 2001
Consumer Records and Customer Transaction Records	Consumer Protection Act 68 of 2008
Credit Assessment and Related Credit Records	National Credit Act 34 of 2005
Pharmacy Records and Regulatory Pharmacy Documentation	Pharmacy Act 53 of 1974
Medicines, Prescriptions and Related Pharmaceutical Records	Medicines and Related Substances Act 101 of 1965
Hazardous Substance Licences, Authorisations	Hazardous Substances Act 15 of 1973

Category of Records	Applicable Legislation
and Radiation Worker Registers	
Driver Permit Records and Transport Documentation	National Road Traffic Act 93 of 1996; National Land Transport Act 5 of 2009
Electronic Communications, Electronic Transactions and Electronically Stored Records	Electronic Communications and Transactions Act 25 of 2002
Payment Card Records, Cardholder Data and PCI Security Records	PCI DSS Standards
Investment Records, Securities Records and Share Registration Records	Companies Act 71 of 2008; Securities Transfer Tax Act 25 of 2007
Property Records, Lease Agreements and Title Deeds	Companies Act 71 of 2008
Legal Files, Litigation Records, Complaints, Pleadings, Investigations and Settlement Agreements	Applicable South African legislation; PAIA; Companies Act
Information Retention, Disposal and Destruction Records	Protection of Personal Information Act 4 of 2013; Promotion of Access to Information Act 2 of 2000

7. DESCRIPTION OF THE SUBJECTS ON WHICH CLICKS GROUP LIMITED HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

7.1 Statutory company information

7.1.1 Memorandum of Incorporation;

7.1.2 Certificate of Change of Name (if any);

7.1.3 Certificate to Commence Business;

7.1.4 Proxy Forms;

7.1.5 Register of Members;

7.1.6 Index of Members;

7.1.7 Register of Mortgages and Debentures and Fixed Assets;

7.1.8 Register of Directors' shareholdings;

7.1.9 Register of Directors and Officers;

7.1.10 Directors' Attendance Register;

7.1.11 Annual Financial Statements including:

7.1.11.1 Annual accounts;

7.1.11.2 Directors' reports;

7.1.11.3 Auditor's report

7.1.12 Books of Account regarding information required by the Companies Act, 2008;

7.1.13 Supporting schedules to books of account and ancillary books of account;

7.2 Accounting records

7.2.1 Books of Account including journals and ledgers;

7.3 Agreements and contracts

7.3.1 Agreements with shareholders, officers or directors;

7.3.2 Employment agreements

7.3.3 Acquisition or disposal documentation;

7.3.4 Agreements with contractors and suppliers;

7.3.5 Restraint of trade agreements

7.4 Taxation

7.4.1 Copies of all Income Tax Returns and other tax returns and documents.

7.5 Legal

7.5.1 Complaints, pleadings, briefs and other documents pertaining to any actual, pending or threatened litigation, arbitration or investigation;

7.5.2 Settlement agreements;

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.1.1 Clicks Group Limited processes personal information to provide customers and patients with services they have requested, to administer customer rewards earned from participating in our loyalty programmes, to fulfil its statutory and regulatory obligations and to maintain and improve its products and services.

8.1.2 Clicks Group Limited may use personal information to:

8.1.2.1 comply with regulatory reporting obligations, including submissions to the regulators that govern the operations of Clicks Group Limited (as a retailer, healthcare provider and processor of personal information);

8.1.2.2 comply with its statutory obligations, including submissions to the relevant government departments;

8.1.2.3 facilitate the provision of services to customers and patients, which may be provided by Clicks Group Limited or by its third-party service providers, which includes virtual healthcare services;

8.1.2.4 enable customers to access third party software platforms or applications in order to participate in the services offered by Clicks Group Limited’s affinity partners;

8.1.2.5 conduct Clicks Group Limited's recruitment and hiring processes, which includes the conducting of criminal record and credit checks, referrals, the capturing of a job applicant's details and the providing of status updates to job applicants;

8.1.2.6 retain and make information available to customers on the Clicks website and applications ("web apps");

8.1.2.7 create user account and allow use of the web apps, and to analyse and compare how customers use web apps, including (without limitation) customer habits, click-patterns, preferences, frequency and times of use, trends and demographic information;

8.1.2.8 establish and verify customers' identity on the web apps;

8.1.2.9 operate, administer, maintain, secure and develop the web apps and the performance and functionality of the web apps;

8.1.2.10 detect, prevent or manage actual or alleged fraud, security breaches or the abuse, misuse or unauthorised use of the web apps and contraventions of its Privacy Policy or any terms and conditions;

8.1.2.11 provide customers with marketing material that they requested;

8.1.2.12 diagnose and deal with technical issues and customer support queries and other user queries;

8.1.2.13 protect Clicks Group Limited's legal rights;

8.1.2.14 communicate with customers and retain a record of communications;

8.1.2.15 comply with labour legislation and BBBEE legislation;

8.1.2.16 ensure the health and safety of customers, patients, visitors and employees;

8.1.2.17 perform its obligations and rights in terms of employment, service and supplier contracts;

8.1.2.18 verify and manage vendor information;

8.1.2.19 comply with listing requirements of the JSE; and

8.1.2.20 for other lawful purposes that are relevant to our business activities or regulatory functions.

8.2 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, patients, and application end users	Name, contact details, health information, identity number, opinions and preferences, correspondence, transaction records, online identifier, medical aid information, application

	usage information, online identifier
Suppliers and vendors	Name, contact details, banking details, tax and VAT number, identity number, BBBEE certificates
Employees	Name, contact details, tax number, banking details, health information, work permit and residence status, work and education history, training records, disciplinary records, beneficiaries and dependants, criminal history, emergency contact, biometric information, correspondence, conflict of interest declarations, medical aid information, pension and provident fund information
Shareholders	Name, identity number, contact details, number and class of shares held, extent of beneficial interest or ownership
Directors	Name, contact details, identity number, conflict of interest declarations
Visitors	Name, contact details, biometric information
Consultants	Name, contact details, tax and banking details, identity number
Government bodies and Regulators	Correspondence

8.3 Categories of recipients to whom personal information may be supplied

Category of personal information	**Categories of recipients to whom personal information may be supplied**
Patient name, contact information, medical aid and health information	Healthcare providers, medical schemes and regulators
Employee information	Family members, regulators, contracted service providers, pension and provident fund
Customer information related to criminal investigations	SAPS
Complaints and reporting	Regulators
Information necessary for providing goods and services and the carrying on of business	Vendors, suppliers, loyalty partners, and customers
Company records, financial transactions, compliance records	Auditors
Company and compliance records	Government departments

8.4 Planned transborder flows of personal information

8.4.1 Clicks Group Limited may transfer personal information to service providers, suppliers, vendors, group companies or other recipients outside South Africa where this is necessary for a lawful business purpose. Any transfer will be undertaken in accordance with section 72 of POPIA, including by ensuring that the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection, or that another lawful basis for the transfer applies. Recipients may process the information only for authorised purposes and must implement appropriate safeguards.

8.5 General description of Information Security Measures implemented to ensure the confidentiality, integrity and availability of the information

8.5.1 Clicks Group Limited implements reasonable and appropriate technical and organisational safeguards designed to protect personal information against loss, damage, unauthorised destruction, unlawful access or unlawful processing. Measures include, where appropriate, access controls, authentication, monitoring, security testing, incident-management procedures, contractual safeguards, staff awareness and training, physical security, backup and recovery controls, and supplier security requirements. Safeguards are reviewed having regard to generally accepted information security practices, the nature of the information and the risks presented by the processing. Clicks Group Limited maintains payment-card security controls aligned to applicable PCI DSS requirements.

8.5.2 Clicks Group Limited has implemented procedures to address actual and suspected data breaches.

9. REQUEST PROCESS

9.1 A requester must submit the prescribed Form 2 to the Information Officer or Deputy Information Officer using the contact details in this Manual and must provide sufficient particulars to identify the requester, the requested record, the preferred form of access and the right the requester seeks to exercise or protect.

9.2 A request made on behalf of another person must include proof of the capacity in which the requester acts. Clicks Group Limited may request proof of identity, authority or any further information reasonably required to process the request.

9.3 Access is subject to PAIA, the payment of any prescribed request or access fee, and the grounds for refusal in Chapter 4 of PAIA. A requester will be notified of any fee payable and, where applicable, any deposit required before the request is processed further.

9.4 Access may or must be refused where a ground in PAIA applies, including the protection of personal information, commercial information, confidential information, safety and security, legally privileged records, research information, or records whose disclosure would prejudice Clicks Group Limited in commercial competition or negotiations.

9.5 Where reasonably possible, access will be granted to any part of a record that can be severed from information that must or may be refused.

9.6 Clicks Group Limited will notify the requester of its decision within the period prescribed by PAIA, subject to any lawful extension. If access is refused, the notice will provide adequate reasons, excluding any reference to the content of the record, and will explain the requester's available remedies.

9.7 A requester who is dissatisfied with a decision of a private body may lodge a complaint with the Regulator in the prescribed manner or apply to a competent court, subject to the requirements and time periods in PAIA.

9.8 Requests may be made on the following prescribed forms:

FORM	DESCRIPTION
Form 01	Request for a Guide from the Information Regulator
Form 01	Request for a copy of the Guide from the Information Officer of Clicks
Form 02	Request for access to a record from Clicks
Form 03	Outcome of request and fees payable
Form 05	Complaint Form

10. AVAILABILITY OF THE MANUAL

10.1 A copy of this Manual is available

10.1.1 On www.clicks.co.za and www.clicksgroup.co.za;

10.1.2 At the Clicks Group Limited Head Office for public inspection during normal business hours;

10.1.3 To any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.4 To the Regulator upon request

10.2 A fee for a copy of this Manual may be charged in accordance with the prescribed fees applicable under PAIA.

11. UPDATING THE MANUAL

The Information Officer will update this Manual on a regular basis.

Issued by:

Ross Forgan

Ross Forgan

Information Officer

Signature certificate

Document details

Title	20261106_Clicks Group Limited_PAIA Manual
File name	20261106_Clicks Group Limited_PAIA Manual.pdf
Document ID	pFYO29Zj3aHbm-ddhCoTK
Final signature date	2026-11-06 13:11:50.344 +02:00
Status	complete

Signature trail

2026-11-06
13:11:47.128
+02:00

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b746c18b630abd6c3c6dca