

# SuperDrive Investments (RF) Limited

Registration Number: 2011/000895/06

## PAIA Manual

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

1. DEFINITIONS .....	1
2. LIST OF ACRONYMS AND ABBREVIATIONS .....	2
3. INTRODUCTION .....	3
4. PURPOSE OF PAIA MANUAL .....	4
5. CONTACT DETAILS FOR ACCESS TO INFORMATION REQUESTS MADE TO SDI .....	5
6. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE .....	6
7. CATEGORIES OF RECORDS OF SDI WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS BY COMPLETING FORM 2 'REQUEST FOR ACCESS TO RECORD' .....	8
8. DESCRIPTION OF THE RECORDS OF SDI WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION .....	9
9. DESCRIPTION OF THE SUBJECTS ON WHICH SDI HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY SDI .....	10
10. PROCESSING OF PERSONAL INFORMATION .....	11
11. AVAILABILITY OF THE PAIA MANUAL .....	19
12. UPDATING OF THE PAIA MANUAL.....	19

## **1. Definitions**

**"SDI" "Our" "We"** means SuperDrive Investments (RF) Limited (Registration Number: 2011/000895/06).

**"Appointed 3<sup>rd</sup> Parties"** means our agents, service providers, suppliers, consultants and any other third party with whom we have an agreement to render products or services to us, both inside and outside the Republic of South Africa.

**"Information Regulator"** means the Information Regulator established in terms of section 39 of the Protection of Personal Information Act 2013.

## 2. List of Acronyms and Abbreviations

IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No.2 of 2000 (as Amended)
PoPIA	Protection of Personal Information Act No.4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa

### **3. Introduction**

The Promotion of Access to Information Act No.2 of 2000 ("PAIA") is a South African law that gives effect to the constitutional right of access to information held by both public and private bodies. It allows individuals to request information to exercise or protect their rights, promoting transparency and accountability within the country's democratic processes.

## **4. Purpose of PAIA Manual**

This manual can be used by members of the public to –

- 4.1. Check the categories of records held by SDI which are available without a person having to submit a formal PAIA request.
- 4.2. Understand how to make a request for access to a record of SDI.
- 4.3. Know the description of the records of SDI which are available in accordance with any other legislation.
- 4.4. Access all the relevant contact details of the Information Officer and Administrators who will assist the public with the records they intend to access.
- 4.5. Know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 4.6. Know if SDI 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.
- 4.7. Know the recipients or categories of recipients to whom the personal information may be supplied.
- 4.8. Know if SDI has plans to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 4.9. Know whether SDI has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 5. Contact Details for Access to Information requests made to SDI

<b>Information Officer</b>	
Name	Roger Rooden
Telephone	0800 600 555 (Switchboard)
E-mail	<a href="mailto:PAIA_Request@bmwfinance.co.za">PAIA_Request@bmwfinance.co.za</a>

<b>Administrator</b>	
Name	Amith Patel
Telephone	0800 600 555 (Switchboard)
E-mail	<a href="mailto:PAIA_Request@bmwfinance.co.za">PAIA_Request@bmwfinance.co.za</a>

<b>Administrator</b>	
Name	Brendan Bouwer
Telephone	0800 600 555 (Switchboard)
E-mail	<a href="mailto:PAIA_Request@bmwfinance.co.za">PAIA_Request@bmwfinance.co.za</a>

<b>Head Office</b>	
Physical Address	01 Bavaria Avenue, Randjespark Ext.17, Midrand, 1685
Postal Address	PO Box 2955, Pretoria, 0001
Telephone	0800 600 555 (Switchboard)
E-mail	<a href="mailto:PAIA_Request@bmwfinance.co.za">PAIA_Request@bmwfinance.co.za</a>
Website	<a href="http://www.bmw.co.za">www.bmw.co.za</a>

## **6. Guide on How to Use PAIA and How to Obtain Access to the Guide**

- 6.1. 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.
- 6.2. The Guide is available in each of the official languages and in braille.
- 6.3. The aforesaid Guide contains the description of-
  - 6.3.1. The objective of PAIA and PoPIA
  - 6.3.2. The postal and street address, phone, and fax number and, if available, electronic mail address of-
    - 6.3.2.1. The Information Officer of every public and private body, and
    - 6.3.2.2. The Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 6.3.3. The manner and form of a request for-
    - 6.3.3.1. Access to a record of a public body contemplated in section 11<sup>3</sup> and
    - 6.3.3.2. Access to a record of a private body contemplated in section 50<sup>4</sup>
  - 6.3.4. The assistance available from the IO of a public body in terms of PAIA and PoPIA;
  - 6.3.5. The assistance available from the Regulator in terms of PAIA and PoPIA;

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<sup>1</sup> Section 17(1) of PAIA- For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>2</sup> 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.

<sup>3</sup> Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) 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 and ground for refusal completed in Chapter 4 of this part.

6.3.6. 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-

6.3.6.1. an internal appeal;

6.3.6.2. a complaint to the Regulator; and

6.3.6.3. an application with a court against a decision by the Information Officer 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.

6.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

6.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

6.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and

6.3.10. the regulations made in terms of section 92<sup>11</sup>.

6.4. A copy of the Guide can be obtained from the website of the Regulator <https://inforegulator.org.za/>

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding -

a) any matter which is required or permitted by this Act to be prescribed;

b) any matter relating to the fees contemplated in sections 22 and 54;

c) any notice required by this Act;

d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and any administrative or procedural matter necessary to give effect to the provisions of this Act.”

**7. Categories of Records of SDI which are available without a person having to request access by completing FORM 2 'Request for Access to Record'**

<b>Category</b>	<b>Type of Record</b>	<b>Available on Website</b>	<b>Available on Request</b>
Regulatory	Promotion of Access to Information Act ("PAIA") Manual	X	
Regulatory	Broad Based Black Economic Empowerment ("BBBEE") Certificate	X	

**8. Description of the records of SDI which are available in accordance with any other legislation**

8.1. None

**9. Description of the subjects on which SDI holds records and categories of records held on each subject by SDI**

Subjects on which SDI holds records <sup>12</sup>	Categories of Records <sup>13</sup>
Financial	Financial Statements Loan and Lease Portfolios Payment Records Accounts Receivable and Payable Budgeting and Forecasting Data Tax Records Asset and Liability Records Risk and Credit Exposure Data Investment Records Statutory Audit Reports Expense and Revenue Records Regulatory Filings
Legal and Compliance	Contracts and Agreements Litigation Files Intellectual Property Records Corporate Governance Documents Data Privacy and Protection Records Audit and Investigation Reports Legal Correspondence Risk Management and Compliance Reports Risk Assessments and Monitoring Incident and Violation Reports Regulatory Filings and Correspondence Third-Party Due Diligence Records Whistleblower Reports
Sales	Customer Sales Records Sales Agreements and Contracts Lead and Prospect Data Pricing and Financing Terms Sales Performance Reports Dealer and Partner Records Customer Communication Logs
Marketing	Marketing Campaign Plans and Strategies Customer and Market Research Data

<sup>12</sup> Not exhaustive and may include other subjects on which SDI holds records.

<sup>13</sup> Not exhaustive and may include other categories of records

Subjects on which SDI holds records <sup>12</sup>	Categories of Records <sup>13</sup>
	Customer Segmentation Records Marketing Materials Digital Marketing Analytics Campaign Performance Reports Lead Generation Records Budget and Expense Records Partnership and Sponsorship Records Customer Feedback and Sentiment Analysis

## 10. Processing of Personal Information

Protecting the personal information of its customers and suppliers is a priority for SDI. To do so, SDI follows data privacy principles in accordance with applicable data privacy legislation such as the Protection of Personal Information Act No.4 2013 ("PoPIA").

### 10.1 Purpose of Processing Customer Personal Information

We process customer personal information as part of the customer relationship with SDI including but not limited to the following purposes:

- **Service Provision and Account Management**  
To open, manage, and maintain customer accounts, including financing and leasing services.
- **Credit Assessment and Risk Management**  
To evaluate credit worthiness, perform risk assessments, and make lending or leasing decisions. (Note: Performed at onboarding when data subject makes finance application to BMW Financial Services (South Africa) (Pty) Ltd.
- **Billing and Payments**  
To process payments, invoicing, and manage collections.
- **Customer Support and Communication**  
To handle inquiries, provide support, send notifications, and communicate important information related to products and services.

- **Compliance with Legal and Regulatory Requirements**  
To fulfil obligations related to anti-money laundering (AML), fraud prevention, tax reporting, and other regulatory duties.
- **Marketing and Customer Relationship Management**  
To send personalized offers, promotions, and information about new products or services, subject to customer consent where required.
- **Contractual Obligations**  
To fulfil terms of contracts and agreements with customers.
- **Fraud Prevention and Security**  
To detect, prevent, and investigate fraud or unauthorized activities.
- **Data Analytics and Business Improvement**  
To analyse customer data for improving products, services, and customer experience, while ensuring data privacy.

## 10.2 Purpose of Processing Supplier Personal Information

We process supplier personal information as part of the supplier relationship with SDI including but not limited to for the following purposes:

- **Supplier Relationship Management**  
To establish, manage, and maintain relationships with suppliers, including communication and coordination.
- **Contract Management and Procurement**  
To negotiate, execute, and manage contracts, purchase orders, and procurement activities.
- **Payment Processing**  
To process invoices, payments, and financial transactions related to goods and services provided by suppliers.
- **Compliance and Regulatory Requirements**  
To comply with legal obligations such as tax reporting, anti-corruption measures, and auditing requirements.
- **Risk Management and Due Diligence**  
To conduct background checks, assess supplier reliability, and manage risks related to supplier engagement.

- **Performance Monitoring and Evaluation**  
To monitor supplier performance, quality of goods or services, and adherence to contractual terms.
- **Security and Fraud Prevention**  
To detect and prevent fraud, unauthorized access, or other security incidents related to supplier interactions.
- **Record Keeping and Reporting**  
To maintain accurate records for internal reporting, audits, and governance purposes.

### 10.3 Description of the categories of data subjects and the information on which SDI holds records

Subjects on which SDI holds records	Categories of Records <sup>14</sup>
Customer	<p><b>1. Identification Information</b></p> <ul style="list-style-type: none"> <li>▪ Full name</li> <li>▪ Date of birth</li> <li>▪ Nationality</li> <li>▪ Government-issued identification numbers (e.g., passport, driver's license, national ID)</li> </ul> <p><b>2. Contact Details</b></p> <ul style="list-style-type: none"> <li>▪ Address (billing and correspondence)</li> <li>▪ Phone numbers</li> <li>▪ E-mail addresses</li> </ul> <p><b>3. Financial Information</b></p> <ul style="list-style-type: none"> <li>▪ Bank account or payment details</li> <li>▪ Debit Order Authorizations</li> <li>▪ Credit history and creditworthiness assessments</li> </ul>

<sup>14</sup> Not exhaustive and may include other categories of records held by SDI

Subjects on which SDI holds records	Categories of Records <sup>14</sup>
	<ul style="list-style-type: none"> <li>▪ Financing, leasing, or loan agreement details</li> </ul> <p><b>4. Account and Contract Information</b></p> <ul style="list-style-type: none"> <li>▪ Customer account numbers and contract documentation</li> <li>▪ Details of products and services purchased or leased</li> <li>▪ Payment history and transaction records</li> </ul> <p><b>5. Communication Records</b></p> <ul style="list-style-type: none"> <li>▪ Correspondence via e-mail, phone, or other channels</li> <li>▪ Customer service interactions and support requests</li> </ul> <p><b>6. Vehicle Information</b></p> <ul style="list-style-type: none"> <li>▪ Details of vehicles financed or leased (e.g., VIN, make, model, etc.)</li> <li>▪ Insurance information related to the vehicle</li> </ul> <p><b>7. Usage and Behaviour Data</b></p> <ul style="list-style-type: none"> <li>▪ Data related to product usage or service interactions (where applicable)</li> <li>▪ Marketing preferences and consent status</li> </ul> <p><b>8. Compliance and Risk Management Data</b></p> <ul style="list-style-type: none"> <li>▪ Information for anti-money laundering (AML) and fraud prevention</li> <li>▪ Credit checks and risk assessments</li> </ul>
Supplier	<p><b>1. Identification Details</b></p> <ul style="list-style-type: none"> <li>▪ Full name of supplier contacts and representatives</li> </ul>

Subjects on which SDI holds records	Categories of Records <sup>14</sup>
	<p><b>2. Contact Information</b></p> <ul style="list-style-type: none"> <li>▪ Phone numbers</li> <li>▪ E-mail addresses</li> <li>▪ Business and mailing addresses</li> </ul> <p><b>3. Financial and Payment Information</b></p> <ul style="list-style-type: none"> <li>▪ Bank account details for payment processing</li> <li>▪ Tax identification numbers and VAT information</li> <li>▪ Invoice and payment records</li> </ul> <p><b>4. Contract and Agreement Records</b></p> <ul style="list-style-type: none"> <li>▪ Signed contracts, agreements, and related correspondence</li> <li>▪ Purchase orders and delivery documentation</li> </ul> <p><b>5. Compliance and Due Diligence Data</b></p> <ul style="list-style-type: none"> <li>▪ Background checks and risk assessments</li> <li>▪ Certifications, licenses, and regulatory compliance documents</li> </ul> <p><b>6. Communication Records</b></p> <ul style="list-style-type: none"> <li>▪ E-mails, meeting notes, and other correspondence related to supplier management</li> </ul> <p><b>7. Performance and Quality Data</b></p> <ul style="list-style-type: none"> <li>▪ Records related to supplier performance evaluations and quality assessments</li> </ul> <p><b>8. Security and Access Information</b></p>

Subjects on which SDI holds records	Categories of Records <sup>14</sup>
	<ul style="list-style-type: none"><li data-bbox="858 405 1474 517">▪ Credentials or access permissions related to company systems or premises (if applicable)</li></ul>

## 10.4 The recipients or categories of recipients to whom the personal information may be supplied

Data Subject	Category of Records <sup>15</sup>	Recipients or Categories of Recipients to whom the personal information may be supplied <sup>16</sup>
Customer	<ul style="list-style-type: none"> <li>▪ Identification Information</li> <li>▪ Contact Information</li> <li>▪ Financial Information</li> <li>▪ Account and Contract Information</li> <li>▪ Communication Records</li> <li>▪ Vehicle Information</li> <li>▪ Usage and Behaviour Data</li> <li>▪ Compliance and Risk Management Data</li> </ul>	BMW Financial Services SA, BMW Group SA, BMW Group SA Agents, Affiliates, Appointed 3 <sup>rd</sup> Parties, Regulatory Authorities, and Government Agencies/Departments provided a valid legal basis exists and other requirements of PoPIA are satisfied to enable the sharing of personal information with such recipients.
Supplier	<ul style="list-style-type: none"> <li>▪ Identification Information</li> <li>▪ Contact Information</li> <li>▪ Financial and Payment Information</li> <li>▪ Contract and Agreement Records</li> <li>▪ Compliance and Due Diligence Data</li> <li>▪ Communication Records</li> <li>▪ Performance and Quality Data</li> <li>▪ Security and Access Information</li> </ul>	BMW Financial Services SA, BMW Group SA, BMW Group SA Agents, Affiliates, Appointed 3 <sup>rd</sup> Parties, Regulatory Authorities, and Government Agencies/Departments provided a valid legal basis exists and other requirements of PoPIA are satisfied to enable the sharing of personal information with such recipients.

## 10.5 Cross-border Transfer of Personal Information

We may from time-to-time transfer Customer and Supplier personal information outside the Republic of South Africa to Affiliates and/or Appointed 3<sup>rd</sup> Parties for processing including but not limited for the following purposes -

- Service Provision and Account Management

<sup>15</sup> Not exhaustive and may include other categories of records held by SDI.

<sup>16</sup> Not exhaustive and may include other recipients or categories of recipients to whom the personal information may be supplied.

- Credit Assessment and Risk Management
- Billing and Payments
- Customer Support and Communication
- Marketing and Customer Relationship Management
- Data Analytics and Business Improvement
- Supplier Relationship Management
- Contract Management and Procurement
- Payment Processing
- Risk Management and Due Diligence
- Record Keeping and Reporting
- Contractual Obligations and Collaboration
- Service Delivery and Support
- Financial Transactions and Payments
- Legal and Regulatory Compliance
- Security and Fraud Prevention

Any transfer of personal information outside the Republic of South Africa will be done in accordance with the requirements of PoPIA.

## **10.6 Security Measures of SDI to ensure confidentiality, integrity, and availability of information**

SDI implements appropriate technical and organizational measures that ensures the confidentiality, integrity, and availability of its information while enabling efficient business operations which include -

- Information Classification and Handling
- Access Control and Rights Management
- Encrypted Exchange of Information
- Physical Security
- Incident Management

## **11. Availability of the PAIA Manual**

A copy of the PAIA Manual is available –

- 11.1. On the BMW website <http://www.bmw.co.za/>
- 11.2. At the Head Office of BMW Financial Services South Africa for public inspection during normal business hours
- 11.3. From SDI upon request and payment of a reasonable prescribed fee as published by the Department of Justice (Appendix 1)
- 11.4. From the Information Regulator upon request.

## **12. Updating of the PAIA Manual**

SDI will periodically review the PAIA Manual and update it if required.

## APPENDIX 1

Item	Description	Amount
1.	The request fee payable by every requestor	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: <ul style="list-style-type: none"> <li>i. Flash drive (to be provided by requestor)</li> <li>ii. Compact disc <ul style="list-style-type: none"> <li>▪ If provided by requestor</li> <li>▪ If provided to the requestor</li> </ul> </li> </ul>	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service Provider
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: <ul style="list-style-type: none"> <li>i. Flash drive (to be provided by requestor)</li> <li>ii. Compact disc <ul style="list-style-type: none"> <li>▪ If provided by the requestor</li> <li>▪ If provided to the requestor</li> </ul> </li> </ul>	R40.00 R40.00 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. To not exceed a total cost of	R145.00 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.