

PHYSICAL ADDRESS

Linbro Business Park
31 Milkyway Avenue
(corner of Milkyway Ave
& Voyager Str), Linbro Park
Sandton, South Africa, 2065

POSTAL ADDRESS

P.O. Box 76461
Wendywood,
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www.sterkinekor.com

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Promotion of Access to Information Act (PAIA MANUAL)

This policy is owned by Ster Kinekor Theatres Proprietary Limited.

The processes contained herein forms part of the organisation's internal control structures and procedures.

As the Chief Executive Officer of the aforementioned organisation, I Mark Sardi hereby confirm the adoption of the processes set out in this document.

Signed by:

5B83AA07465742A...

CEO Signature

02 December 2025

Date

STER KINEKOR THEATRES (PTY) LTD (REG. NO. 2018/482630/07)

Directors: A Marshall (Chairman), M Sardi (CEO), CJ Kujenga, D Place, R Williams, R Wood-Collier, N Van Zyl

Executive Management: A Ashker, K Bogatsu, H Martin, N Scheepers, L Wylie, M Broome

1) DEFINITIONS

PAIA means the Promotion of Access to Information Act 2 of 2000

POPI means the Promotion of Personal Information Act 4 of 2013

Information Regulator means the Regulator established in terms of Section 39 of POPI

Person means a natural person or a juristic person

Private body means:

- a natural person who carries or has carried on any trade, business, or profession, but only in such capacity\
- a partnership which carries or has carried on any trade, business, or profession; or
- any former or existing juristic person, but excludes a public body

Public body means:

- any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- any other functionary or institution when:
 - exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - exercising a public power or performing a public function in terms of any legislation

Head, in relation to, a private body means:

- in the case of a natural person, that natural person or any person duly authorised by that natural person;
- in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- in the case of a juristic person:
 - the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or the person who is acting as such or any person duly authorised by such acting person

Information Officer means the head of a private body.

Deputy Information Officer means the person to whom any power or duty conferred or imposed on an Information Officer by POPI has been delegated.

Requester in relation to a private body, means any person, including, but not limited to public body or an official thereof, making a request for access to a record of the organisation or a person acting on behalf of such person.

Personal Requester means a requester seeking access to a record containing personal information about the requester.

Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person, the biometric information of the person; the personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; the views or opinions of another individual about the person; and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Request for access means a request for access to a record of the organisation in terms of section 50 of PAIA.

Record means any recorded information regardless of the form or medium, in the possession or under the control of the organisation irrespective of whether or not it was created by the organisation

Data Subject means the person to whom personal information relates.

Third Party in relation to a request for access to a record held by the organisation, means any person other than the requester.

Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information

2)PURPOSE OF A PAIA MANUAL

The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.

The purpose of PAIA is to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to
- actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights.

The organisation recognizes everyone's right to access to information and is committed to providing access to the organisation's records where the proper procedural requirements as set out by PAIA and POPI have been met.

The organisation's PAIA manual is compiled in accordance with section 51 of the Act and contains the following provisions:

Annexure A: Contact Details & Business Type

This section provides the organisation's postal and street address, phone, and fax number and, if available, the e-mail address of the head of the organisation

Annexure B: Section 10 PAIA Guide

This section provides a description of the guide referred to in Section 10 of PAIA and how you may obtain access to it.

Annexure C: Automatically Available Information

Lists information that is automatically available without a formal PAIA request, such as public product information, public corporate records, media releases, newsletters, magazine articles, permits, licences, and the B-BBEE certificate.

Annexure D: Categories of Information Available Upon Request

Provides categories and records that require a formal PAIA request, including regulatory, administrative, human resources, financial, marketing, client/customer, and third-party information.

Annexure E: Information Available in Terms of Other Legislation

Lists statutes under which the organisation is required to maintain records, such as the Companies Act, Employment Equity Act, and Protection of Personal Information Act.

Annexure F: Information in Terms of POPIA

Details how the organisation processes personal information, including purposes of processing, categories of data subjects, types of personal information, recipients, transborder flows, and security measures.

Annexure G: Request Procedure

Sets out the procedure for submitting a PAIA request, including required particulars, fees, and forms of access.

Annexure H: Fees Payable

Specifies the prescribed fees for processing requests, copies, and searches.

3) DUTIES OF THE INFORMATION OFFICER

The Information Officer and/or the Deputy Information Officer of the organisation are responsible for:

- Publishing and proper communication of the manual i.e., creating policy awareness.
- The facilitation of any request for access
- Providing adequate notice and feedback to the requester
- Determining whether to grant a request for access to a complete/full record or only part of a record
- Ensuring that access to a record, where so granted, is provided timeously and in the correct format.
- Reviewing the policy for accuracy and communicating any amendments

Right of Access

The Information Officer and/or Deputy Information Officer may only provide access to any record held by the organisation to a requester if:

- The record is required for the exercise or protection of any right, and
- The requester complies with the procedural requirements relating to a request for access to that record, and
- Access to that record is not refused in terms of any of the grounds for refusal listed below.

Grounds for Refusal

The Information Officer and/or Deputy Information Officer must assess whether there are any grounds for refusing a request for access. Where any grounds for refusal are found, a request for access will not be granted. However, despite finding any grounds for refusal, access to the record(s) will be provided where:

- the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law or imminent and serious public or environmental risk, and
- The public interest in disclosing record, will clearly outweigh the harm contemplated in the provision in question.

Where there are no grounds for refusal, request for access will be granted. If a request for access is made with regards to a record containing information that would justify a ground for refusal, every part of the record which.

- does not contain, and
- can reasonably be severed from any part that contains, any such information must, despite any other provision of PAIA, also be disclosed.

The grounds for refusal, or absence thereof, are set out below:

Notice

Where a request for access has been received the Information Officer and/or Deputy Information Officer will notify the requester of receipt and the prescribed fee (if any) that is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

The notice must state:

- The amount of the deposit payable (if any)
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be.
- The procedure (including the period) for lodging the complaint with the Information Regulator or the application.

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and/or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- Decide in accordance with PAIA whether to grant the request, and
- Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible.

If the request for access is granted, the notice must state:

- The access fee (if any) to be paid upon access.
- The form in which access will be given, and
- That the requester may lodge a complaint with the Information Regulator or an application with a court against the access fee to be paid or the form of access granted, and the procedure, including the period allowed, for lodging a complaint with the Information Regulator or the application

If the request for access is refused, the notice must:

- State adequate reasons for the refusal, including the relevant provision of PAIA that was relied on.
- Exclude, from any such reasons, any reference to the content of the records' and
- State that the requester may lodge a complaint with the Information Regulator or an application with a court against the refusal of the request, and the procedure (including the period) for lodging a complaint with the Information Regulator or the application.

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- Is in the organisation's possession, but cannot be found, or
- Simply does not exist,
- The head of the organisation must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to those records.
- The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

ANNEXURE A: CONTACT DETAILS & BUSINESS TYPE

A. Organisation Contact Details

Postal address: PO Box 76461 Wendywood, Johannesburg, 2144

Street address: Linbro Business Park 31 Milkyway Avenue, Sandton, South Africa, 2065

Phone number: 011 445 7700

Contact Centre: 0861668437

B. Head of Organisation

Full names & surname: Mark Sardi

Email address: MarkS@sterkinekor.com

C. Deputy Information Officers

1. Full name & surname: Hilton Martin
Email address: HiltonM@sterkinekor.com
Phone number: (011) 445 7700

2. Full name & surname: Khumo Bogatsu
Email address: KhumoB@sterkinekor.com
Phone number: (011) 445 7700

D. Business Type

The exhibition of films and advertising at cinema complexes

ANNEXURE B: SECTION 10 PAIA GUIDE

PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. Where a public body lodges a request, the public body must be acting in public interest.

Requests in terms of PAIA shall be made in accordance with the prescribed procedures at the rates provided.

Requesters are referred to the guide in terms of section 10 of the Act which has been compiled by the South African Human Rights Commission. The guide contains information for the purposes of exercising Constitutional rights.

The guide is available in all South African official languages free of charge and any person may request a copy of the guide. A copy of the guide may be obtained by contacting the South African Human Rights Commission at:

- Postal Address: **The South African Human Rights Commission, PAIA Unit, Private Bag 2700, Houghton, 2041**
- Telephone Number: **+27(0)118773600**
- Fax Number: **+27(0)114030625**
- Website: **www.sahrc.org.za**

ANNEXURE C: AUTOMATICALLY AVAILABLE INFORMATION

Public Product Information

Public Corporate Records

Media Releases

Published Newsletters

Magazine Articles

Permits, Licenses and Authorities

B-BBEE Certificate

ANNEXURE D: CATEGORIES OF INFORMATION AVAILABLE

1. Public Affairs

- Public Product Information
- Public Corporate Records
- Media Releases
- Published Newsletters
- Magazine Articles

2. Regulatory & Administrative

- Permits, Licenses or Authorities
- FICA Internal Rules
- Health & Safety Plan
- Memorandum of Incorporation
- Minutes of Board or Directors Meetings
- Register of Members
- Register of Board of Directors
- Internal correspondence (e-mails/memos)
- Insurance Policies held by organisation

3. Human Resources

- Employment Applications
- Employment Contracts
- Personal Information of Employees
- Employment Equity Plan
- Medical Aid Records
- Pension Fund Records
- Disciplinary Records
- Performance Management Records
- Salary Records
- Employee Benefit Records
- PAYE Records
- Seta Records
- Disciplinary Code
- Leave Records
- Training Records
- Training Manual

4. Financial

- Financial Statements
- Financial and Tax Records
- Asset Register
- Management Accounts and Reports
- Vouchers, Cash Books and Ledgers
- Banking Records and Statements
- Electronic Banking Records

5. Marketing

- Market Information
- Product Brochures
- Advertisements
- Field Records
- Performance Records
- Product/ Service Sales Records
- Marketing Strategies

6. Client Customer

- Customer/ Client Database
- Customer/ Client agreements
- Customer/ Client Files
- Customer/ Client Instructions
- Customer/ Client Correspondence

7. Third Party

- Rental agreements
- Supplier Contracts
- Non-disclosure agreements
- Letters of Intent

ANNEXURE E: INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Basic Conditions of Employment Act
Broad-Based Black Economic Empowerment Act
Companies Act
Compensation for Occupational Injuries and Diseases Act
Competition Act
Consumer Protection Act
Electronic Communications Act
Copyright Act
Customs and Excise Act
Electronic Communications and Transactions Act
Employment Equity Act
Financial Advisory & Intermediary Services Act
Financial Institutions (Protection of Funds) Act
Financial Intelligence Centre Act
Income Tax Act
Labour Relations Act
long-Term Insurance Act
Medical Schemes Act
National Credit Act
Occupational Health and Safety Act
Patents Act
Prevention of Organised Crime Act
Protection of Personal Information Act
Prevention And Combating of Corrupt Activities Act
Promotion of Access to Information Act
Promotion of Equality and Prevention of Unfair Discrimination Act
Protected Disclosures Act
Short-Term Insurance Act
Skills Development Act
Trademarks Act
Unemployment Insurance Act
Value-Added Tax Act

ANNEXURE F: INFORMATION IN TERMS OF POPIA:

1. Purpose of Processing Personal Information

Ster Kinekor processes personal information for purposes including (but not limited to):

- Marketing, customer engagement and promotional communications
- Managing bookings, customer enquiries and customer service interactions
- Employment and human-resources administration
- Supplier and service-provider management
- Security, fraud prevention and incident reporting
- Compliance with legal, regulatory and audit requirements
- Financial transactions, billing, invoicing and payment processing
- Managing cinema access, safety and CCTV monitoring

2. Categories of Data Subjects

Ster Kinekor processes personal information relating to:

- Customers
- Loyalty members
- Website users
- Employees
- Suppliers
- Business partners
- Visitors
- Competition entrants

3. Categories of Personal Information Processed

Includes:

- Identifying info
- Contact details
- Financial info
- Loyalty programme info
- Online identifiers
- CCTV footage
- Employment-related info
- Supplier details
- Correspondence records

4. Recipients or Categories of Recipients of Personal Information

Includes:

- Authorised employees
- IT providers
- Loyalty partners
- Payment processors
- Marketing providers
- Legal professionals
- Insurers
- Law enforcement
- Consultants

5. Planned Transborder Flows of Personal Information

Ster Kinekor may transfer personal information outside South Africa (in compliance with POPIA section 72) for:

- Cloud hosting
- Backups
- Analytics
- Communications
- Loyalty systems

6. Information Security Measures

Includes:

- Access control
- Encryption
- Secure networks
- Vulnerability assessments
- Backups
- Policies
- Employee training
- Contractual obligations

ANNEXURE G: REQUEST PROCEDURE:

To facilitate the processing of your request, kindly complete and submit the form below to the e-mail address of the Deputy Information Officer indicated in Annexure A.

The Deputy Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

Once the request has been processed, the Deputy Information Officer will inform you of the outcome of your request and any additional fees that may fall due.

Please be advised that PAIA provides several grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- The privacy and interests of other individuals are protected.
- Where such records are already otherwise publicly available
- Instances where public interest are not served.
- The mandatory protection of commercial information of a third party
- The mandatory protection of certain confidential information of a third party

When completing the form below please:

- Indicate the identity of the person seeking access to the information.
- Provide sufficient particulars to enable the deputy information officer to identify the information requested.
- Specify the format in which the information is required.
- Indicate the contact details of the person requiring the information.
- Indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will;
- Enable the person to protect and/or exercise the right.
- Where the person requesting the information wishes to be informed of the decision of the request
- If the request for information is made on behalf of another person, submit proof that the person submitting the request,
- Has obtained the necessary authorisation to do so.

A. Particulars of Private Body

The Head:

B. Particulars of Person Requesting Access to the Record

- (i) The particulars of the person who requests access must be recorded below.
- (ii) Provide an address and/or fax number in the Republic to which information must be sent.
- (iii) Attach proof of capacity, if applicable.

Full names & surname:

Identity number:

Postal address:

Fax number:

Telephone number:

Email address:

Capacity:

C. Particulars of Person on Whose Behalf Request is Made

Complete only if the request is made on behalf of another person.

Full names & surname:

Identity number:

D. Particulars of Record

- (i) Provide full details of the record to which access is requested, including reference number if known.
- (ii) If more space is required, attach additional pages and sign them.

Description of record:

Reference number:

Any further particulars:

E. Fees

- (i) Requests for access to records (excluding personal information) will be processed only after payment of the request fee.

- (ii) You will be advised of the fee amount.
- (iii) The fee depends on the form of access and time required to locate/prepare the record.
- (iv) If you qualify for fee exemption, state reason:

Reason for exemption:

F. Form of Access Required

If you are unable to read/view/listen to the record in the provided form, state below.

Disability:

Form in which required:

Mark the appropriate box with an "X"

- (i) Your indication as to the required form of access depends on the form in which the record is available
- (ii) Access in the form requested may be refused in certain circumstances, In such a case you will be informed of access will be granted in another form
- (iii) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested

1) If the record is in written or printed form:

- copy of record
- inspection of record

2) If record consists of visual images:

- view the images
- copy of the images
- transcription of the images

3) If the record consists of recorded words or information which can be reproduced in sound:

- listen to the soundtrack
- transcription of the soundtrack

4) If the record is held on computer or in an electronic or machine-readable form:

- printed copy of record
- copy in computer readable form

Please indicate the preferred method of delivery

- By hand
- Email
- Post
- Fax

G. Particulars of the Right to be Exercised or Protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all additional folios.

Indicate which right is to be exercised or protected:

Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding the request for access

You will be notified in writing whether your request has been approved/ denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

I. Signature Page

Signed at:

Date:

Signature of Requester / Person on whose behalf the request is made:

ANNEXURE H: FEES PAYABLE:

The fees payable for requests for information are the following:

1. Request fee payable by a requester, other than a personal requester referred to in section 54 (1) of the Act - R140,00
2. For every photocopy of an A4 -sized page or part thereof - R2,00
3. For every printed copy of an A4 -sized page or part thereof - R2,00
4. For copy in a computer readable form on:
 - a. Flash drive or CD provided by requestor - R40,00
 - b. CD provided by the organization - R60,00
5. Transcription of visual images, for an A4 -sized page or part thereof - The service will be sought. The fee will depend on the quotation provided from the service provider.
6. A copy of visual images – R60,00 The service will be outsourced. The fee will depend on the quotation provided from the service provider.
7. A transcription of an audio record, for an A4 -sized page or part thereof - R24,00
8. A copy of an audio record - R40,00
9. To search for the record for disclosure (for each hour or part thereof, but excluding the first hour) - R145,00, to not exceed a total cost of R 435,00
10. The actual postal fee is payable when a copy of the record must be posted to a requester.