

PROMOTION OF ACCESS TO INFORMATION MANUAL

Prepared in accordance with section 51 of the
Promotion of Access to Information Act 2 of 2000

DSM NUTRITIONAL PRODUCTS SOUTH AFRICA (PTY) LTD

Registration number 2002/004181/07

Information Officer

WAKHESIVE DLAMINI

2026 EDITION

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Public availability

Copies of this Manual are available for inspection, free of charge, at the offices of DSM Nutritional Products South Africa (Pty) Ltd's principal place of business and on the relevant company website and supplied to any person on request in accordance with PAIA.

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1. Introduction and purpose

The Promotion of Access to Information Act 2 of 2000 ("PAIA") gives effect to the constitutional right of access to information. In relation to a private body, access may be requested where the record is required for the exercise or protection of a right, subject to PAIA and any applicable grounds of refusal.

The Protection of Personal Information Act 4 of 2013 ("POPIA") regulates the processing of personal information by responsible parties and amended certain provisions of PAIA. This Manual explains how requests for access to records of DSM Nutritional Products South Africa (Pty) Ltd ("DNPSA") may be made and records the information required for a private body under section 51 of PAIA.

This Manual also explains how a data subject may object to processing, or request correction, deletion or destruction of personal information, using the prescribed POPIA forms included as appendices.

2. Company and Information Officer details

Item	Details
Company	DSM Nutritional Products South Africa (Pty) Ltd
Registration number	2002/004181/07
Information Officer	Wakhesive Dlamini
Deputy Information Officer	Stella Bansah
Postal address	PO Box 2, Isando, Kempton Park, 1600
Physical address	16 Brewery Road, Isando, Johannesburg, South Africa, 1600
Telephone	(27) 11 398 6900
Email	wakhesive.dlamini@dsm-firmenich.com stella.bansah@dsm-firmenich.com

PAIA and POPIA requests addressed to DNPSA should be submitted to the Information Officer using the details above.

3. Guide on how to use PAIA

The Information Regulator has published a guide under section 10(1) of PAIA to assist persons who wish to exercise rights under PAIA and POPIA. The guide is available in the official languages and in braille and explains, among other matters, the objects of PAIA and POPIA, how requests are made, assistance available, applicable remedies, voluntary disclosure and fees.

Information Regulator contact details:

Channel	Details
Telephone	010 023 5200

Email	enquiries@inforegulator.org.za
Website	inforegulator.org.za

[Access the Information Regulator PAIA Guide](#)

4. Records available without a request

No notice identifying categories of DNPSA records automatically available under section 51(1)(b)(ii) of PAIA is recorded in this Manual. Information freely available on the dsm-firmenich website may be accessed without submitting a formal PAIA request.

Visit www.dsm-firmenich.com

5. Description of Records of DNPSA available under other legislation

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

This list is not exhaustive. Availability of a record remains subject to applicable law and any lawful restriction on disclosure.

6. Categories of records held by DNPSA

The following is a list of the subjects on which DNPSA holds records and the categories into which these records fall. The procedure in terms of which such records may be requested from DNPSA is set out in Section 7 of this manual

Category	Typical records
Corporate governance and statutory	Memorandum of incorporation; registers; director, auditor, company secretary and public officer records; board and shareholder records; statutory returns.
Finance and tax	Annual financial statements; accounting records; tax returns; PAYE, VAT, UIF and levy records; asset registers; invoices; payment and banking records; rental agreements.
Human resources	Employment contracts; remuneration and benefit records; leave, training, disciplinary and employment equity records; medical aid and pension fund administration records; policies, codes and manuals, address and internal telephone lists.
Commercial and procurement	Customer and supplier agreements; service agreements; purchase orders; tenders; quotations; pricing; distribution, logistics and warehousing records; due diligence records.
Operations, quality and safety	Manufacturing and product records; quality management records; specifications; health and safety records; incident records; environmental and site records.
Legal, compliance and risk	Legal advice and privileged records; litigation and dispute records; compliance reviews; licences and permits; insurance; investigations; data protection and information governance records.
Information technology	System inventories; software and licence records; access-control records; cybersecurity and incident records; support and change-management records.
Marketing and communications	Product information; website content; promotional material; corporate communications;

	stakeholder and event records.
Research and intellectual property	Research, development and innovation records; trade secrets; know-how; formulations; trademarks; copyright; patents and related licence records.

It should be noted that the records listed above will not, in all instances, be provided to a requester who requests them in terms of PAIA. The Requester has to show that he or she has the right, in terms of PAIA, to be given access to the records in question.

7. Requesting access to a record

7.1 Who may request access

A requester may seek access to a record of DNPSA if the record is required for the exercise or protection of a right. A request may be made personally or on behalf of another person, provided adequate proof of authority is supplied.

7.2 Prescribed form and submission

1. Complete the prescribed PAIA Form 2 in Appendix 1.
2. Provide sufficient particulars to identify the requester and the record requested.
3. Identify the right to be exercised or protected and explain why the record is required for that purpose.
4. State the preferred form and manner of access.
5. Attach proof of identity and, where applicable, proof of authority to act for another person.
6. Submit the completed form to the Information Officer at the physical, postal or email address in section 2.
7. Pay any prescribed request fee, unless exempt. The requester will be notified of any further access fee or deposit payable.

7.3 Assistance and accessibility

A person who requires assistance to complete a request, or who cannot make a written request because of illiteracy or disability, may approach the Information Officer or the Information Regulator for assistance in accordance with PAIA.

7.4 Decision period

DNPSA will notify the requester of its decision within 30 days after receipt of a valid request, subject to any lawful extension of not more than a further 30 days. Where the period is extended, the requester will be notified of the extension and reasons.

8. Grounds for refusing access

Access may be refused only on a ground permitted by PAIA. Depending on the record and circumstances, the grounds may include:

- unreasonable disclosure of the personal information of a third party who is a natural person;
- protection of third-party commercial, scientific or technical information, trade secrets or confidential information, the disclosure of which would be likely to cause harm to the commercial or financial interest of that third party;
- protection of confidential information supplied by a third party in terms of a confidentiality undertaking;
- protection of the safety of individuals or security of property;
- protection of records privileged from production in legal proceedings;
- protection of DNPSA's commercial information, trade secrets, computer programmes, negotiations or competitive position;
- protection of research information where disclosure could cause serious disadvantage to DNPSA; and
- any other mandatory or discretionary ground of refusal provided for in PAIA.

Where reasonably possible, access may be granted to a severable part of a record after information lawfully withheld has been removed. The public-interest override in PAIA will be applied where its statutory requirements are met.

9. Decision, fees and forms of access

9.1 Notification of outcome

The Information Officer will notify the requester in writing whether access is granted or refused. A refusal notice will identify the applicable ground and inform the requester of available remedies.

9.2 Fees

Fees are payable in accordance with PAIA and the regulations. The applicable request fee, access fee and any permitted deposit may be required before access is provided. A personal requester and any other requester exempted by law will not be charged a request fee where the exemption applies.

Under POPIA, a data subject may request confirmation, free of charge, whether DNPSA holds personal information about that data subject. Where a fee may lawfully be charged for access or copies, DNPSA will provide a written estimate before providing the service. The fee structure in respect of fees payable to Private Bodies can be accessed on the Regulator's website.

9.3 Form of access

Subject to PAIA, access may be provided by inspection, a copy or reproduction, transcript, electronic delivery or another reasonable form requested, taking into account the nature of the record and any need to protect the record or third-party rights.

10. Remedies and complaints

DNPSA is a private body and does not have an internal appeal procedure under PAIA. A requester or third party dissatisfied with a decision may lodge a complaint with the Information Regulator or apply to a competent court for appropriate relief, within the periods and in the manner prescribed by PAIA.

Information Regulator

Complaints and enquiries may be directed to the Information Regulator. Current contact details and prescribed complaint forms are available from the Regulator's website.

11. POPIA information

11.1 Purposes of processing

DNPSA processes personal information for lawful purposes connected with its business and legal obligations. Depending on the relationship and context, purposes may include employment administration; customer and supplier management; contracting; payment and finance; regulatory compliance; product, quality and safety management; security; information technology; communications; legal claims; and legitimate operational requirements.

11.2 Categories of data subjects

- employees, former employees, applicants and other personnel;
- customers and prospective customers;
- suppliers, service providers, contractors and their personnel;
- business partners, professional advisers and representatives;
- directors, officers, shareholders and other corporate stakeholders;
- visitors, website users and persons who communicate with DNPSA; and
- any other person whose personal information is processed in connection with DNPSA's activities.

11.3 Categories of personal information

- identity, contact and demographic information;
- employment, education, professional and remuneration information;
- financial, tax, banking and transaction information;

- contractual, procurement and commercial information;
- health, safety and security information where lawfully processed;
- electronic identifiers, device, access and usage records;
- correspondence, complaints, enquiries and legal records; and
- other information required for lawful business or regulatory purposes.

11.4 Recipients

Depending on the nature of the data, DNPSA may supply information or records to the following categories of recipients:-

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data;
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules (i.e. the Competition Commission in terms of the Competition Act No. 89 of 1998);
- South African Revenue Services, or another similar authority;
- Anyone making a successful application for access in terms of PAIA;
- Subject to the provisions of POPI and the National Credit Act No. 34 of 2005, DNPSA may share information about a customer's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which DNPSA operates;
- Personal information may be supplied, where lawful and appropriate, to group companies; service providers and operators; professional advisers; banks and payment providers; benefit providers; auditors; insurers; and other recipients authorised by law or by the data subject.

11.5 Cross-border transfers

If a data subject visits the dsm-firmenich website from a country other than the country where DNPSA's servers are located, the various communications will necessarily result in the transfer of information across international boundaries. DNPSA may need to transfer a data subject's information to other group companies or service providers in countries outside South Africa, in which case DNPSA will fully comply with applicable data protection legislation. Such transfers will be handled in accordance with POPIA and other applicable data-protection requirements, including section 72 of POPIA where applicable.

11.6 Security safeguards

DNPSA is committed to implementing leading data security safeguards.

DNPSA has specialised security teams who constantly review and improve DNPSA's measures to protect data subject's personal information from unauthorised access, accidental loss, disclosure or destruction.

If DNPSA has a contract with another organisation to provide DNPSA with services or a service on DNPSA's behalf to process a data subject's personal information, DNPSA will ensure that they have appropriate security measures and only process the information in the way DNPSA has authorised them to. These organisations won't be entitled to use a data subject's personal information for their own purposes. If necessary, DNPSA's security teams will check them to make sure they meet the security requirements DNPSA has set.

Communications over the internet (such as emails) are not secure unless they have been encrypted. A data subject's communications may go through a number of countries before being delivered – as this is the nature of the internet. DNPSA cannot accept responsibility for any unauthorised access or loss of personal information that is beyond DNPSA's control. DNPSA applies reasonable technical and organisational safeguards designed to protect personal information against loss, damage, unauthorised destruction, unlawful access or unlawful processing.

11.7 Data-subject requests

Subject to POPIA, a data subject may request access to personal information, object to processing on applicable grounds, or request correction, deletion or destruction of personal information. The prescribed forms are included in Appendices 2 and 3 and must be submitted to the Information Officer.

12. Updating and availability of this Manual

The Information Officer will review this Manual regularly and update it when necessary to reflect changes in law, regulation, guidance, organisational details or categories of records and processing activities.

This Manual is available for inspection at DNPSA's physical address during normal business hours, on the relevant company website, and from the Information Officer on request.

Signed at Isando on this 28th day of August 2026.

DocuSigned by:

Wakhesive Dlamini

377DC90A696B448
WAKHESIVE DLAMINI
INFORMATION OFFICER
DSM NUTRITIONAL PRODUCTS SOUTH AFRICA (PTY) LTD

Appendix 1

PAIA Form 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

Note:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The information officer: Wakhesive Dlamini

(Address)

E-mail address: Fax number:

Mark with an "X"

☐ Request is made in my own name

☐ Request is made on behalf of another person.

PERSONAL INFORMATION			
Full names:			
Identity number:			
Capacity in which request is made (when made on behalf of another person):			
Postal Address:			
Street Address:			
E-mail Address:			
Contact numbers:	Tel. (B):		Facsimile:
	Cellular:		

Full names of person on whose behalf request is made (if applicable):			
Identity number:			
Postal Address:			
Street Address:			
E-mail Address:			
Contact numbers:	Tel. (B):		Facsimile
	Cellular:		
PARTICULARS OF RECORD REQUESTED			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			

Reference number, if available:		
Any further particulars of record:		
TYPE OF RECORD		
<i>(Mark the applicable box with an "X")</i>		
Record is in written or printed form		
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)		
Record consists of recorded words or information which can be reproduced in sound		
Record is held on a computer or in an electronic, or machine-readable form		
FORM OF ACCESS		
<i>(Mark the applicable box with an "X")</i>		
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)		
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)		
Transcription of soundtrack (written or printed document)		
Copy of record on flash drive (including virtual images and soundtracks)		
Copy of record on compact disc drive (including virtual images and soundtracks)		
Copy of record saved on cloud storage server		

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>

Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
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:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason:	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (state rank, name and surname of information officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of information officer

APPENDIX 2

**FORM 1 OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF
SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	

	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of 20.....

.....
Signature of data subject/designated person

Appendix 3

POPIA Form 2: Request for correction or deletion

Request under section 24(1) of POPIA and regulation 3. Mark the applicable request and attach supporting documents where appropriate.

- ☐ Correction or deletion of personal information
- ☐ Destruction or deletion of a record of personal information that DNPSA is no longer authorised to retain

A. Data subject: full name / registered name

Unique identifier / identity number

Residential, postal or business address

Contact number and email

B. Responsible party: DSM Nutritional Products South Africa (Pty) Ltd

C. Information to be corrected, deleted or destroyed

D. Detailed reasons for the request

Signed at _____ on _____

Signature of data subject / designated person: _____