PRIVATE BODY MANUAL OF MELTWATER PREPARED IN TERMS OF THE
PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 ("PAIA")
1. CONTACT DETAILS

1.1 Name of Bodies: Meltwater South Africa Pty Ltd (Company Registration Number: ●)
Meltwater News SA1 Pty Ltd (Company Registration Number: )

1.2 Physical Address: 3 Dock Rd, Victoria & Alfred Waterfront, Cape Town, 8001

1.3 Postal Address: See 1.2 above.

1.4 Telephone: +27218385100

1.5 E-mail: privacy@meltwater.com

2. OVERVIEW AND OBJECTIVES OF THE MANUAL

2.1 PAIA gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State, as well as information held by another person (or private body) when such privately held information is required for the exercise and protection of rights.

2.2 More broadly, PAIA aims to underline the importance of access to information in a democratic society by fostering a culture of transparency and accountability. PAIA does this by requiring public (government) and private (non-government) bodies to create both a manual describing the type of records they hold, and procedures for others to access that information.

2.3 PAIA also sets limits on the types of information that can be accessed.

2.4 This manual is compiled in accordance with Section 51 of PAIA and offers an outline of information held by Meltwater, which is accessible to the public.

3. INTRODUCTION TO MELTWATER

Meltwater was founded in Oslo, Norway, in 2001. We are a global online media monitoring company. Meltwater helps companies make better, more informed decisions based on
insights from online data. We have 50 offices across six continents, and we are dedicated to personal, global service, built on local expertise.

4. INFORMATION OFFICER

4.1 Matthew Barclay, is in terms of PAIA and the Protection of Personal Information Act, 4 of 2013 (“POPIA”), Meltwater’s Information Officer.

4.2 The Deputy Information Officer can be contacted at:
Postal Address : 3 Dock Rd, Victoria & Alfred Waterfront, Cape Town, 8001
Physical address: 3 Dock Rd, Victoria & Alfred Waterfront, Cape Town, 8001
Telephone: +27218385100
E-mail: privacy@meltwater.com

5. SECTION 10 GUIDE

5.1 The South African Human Rights Commission (SAHRC) has published a guide as prescribed by Section 10 of PAIA. This guide will be available from the SAHRC until 30 June 2021, in each official language, at the offices of the SAHRC and on its website, listed below. Please direct any queries regarding the guide to:

South African Human Rights Commission:

PAIA Unit
The Research and Documentation Department
Private Bag X2700, Houghton, 2041
Telephone Number: (011) 877 3600
Telefax Number: (011) 403 0684
Website: www.sahrc.org.za
email: info.sahrc.org.za

5.2 From 1 July 2021 onwards, the above guide, as updated by the Information Regulator, will be available at the offices of the Information Regulator and on its website as prescribed by Section 10 of PAIA and in accordance with the Protection of Personal Information Act, 2013 (“POPIA”). From 1 July 2021, please direct any queries regarding this guide to:
6. RECORDS THAT ARE AVAILABLE IN TERMS OF OTHER LEGISLATION

6.1 Where applicable and insofar as the requester complies with the requirements set out in the relevant Act, the requester may request information which is available in terms of the following legislation, as amended:

6.1.1 Basic Conditions of Employment Act 75 of 1997
6.1.2 Broad Based Black Economic Empowerment Act 53 of 2003
6.1.3 Companies Act 61 of 1973, 75 of 2008
6.1.4 Compensation for Occupational Injuries and Diseases Act 130 of 1993
6.1.5 Competition Act 89 of 1998
6.1.6 Copyright Act 98 of 1978
6.1.7 Drugs Control Amendment Act 65 of 1964
6.1.8 Electronic Communications and Transactions Act 25 of 2002
6.1.9 Employment Equity Act 55 of 1998
6.1.10 Gas Act 48 of 2001
6.1.11 Gas Regulator Levies Act 2002 Act 75 of 2002
6.1.12 Hazardous Substances Act 15 of 1973
6.1.14 Insolvency Act 24 of 1936
6.1.15 Labour Relations Act 66 of 1995
6.1.16 Medical Schemes Act 131 of 1998
6.1.17 Medicines and Related Substances Control Act 101 of 1965
6.1.18 Mineral and Petroleum Resources Development Act 28 of 2002
6.1.19 Occupational Health and Safety Act 85 of 1993
6.1.20 Patents Act 57 of 1987
6.1.21 Pension Funds Act 24 of 1956
6.1.23 Petroleum Products Act 120 of 1997
6.1.25 Regional Services Councils Act 109 of 1985
6.1.26 SA Securities Act 36 of 2004
6.1.27 Skills Development Act 97 of 1998
6.1.28 Skills Development Levies Act 9 of 1999
6.1.29 Trade Marks Act No 194 of 1993
6.1.30 Unemployment Insurance Act 63 of 2001
6.1.31 Unemployment Insurance Contributions Act 4 of 2002
6.1.32 Value Added Tax Act 89 of 1991

7. SUBJECTS AND CATEGORIES OF INFORMATION HELD

This section of the Manual sets out the subject and categories of records held by Meltwater. The inclusion of any subject or category of records should not be taken as an indication that records falling within those subjects and/or categories will be made available under the Act. In particular, certain grounds of refusal as set out in the Act may be applicable to a request for such records. The following information should be formally requested as set out in 8 below:

7.1 Financial records, including:
7.1.1 statutory books of account;
7.1.2 budget reports;
7.1.3 bank reports;
7.1.4 audited financial statements;
7.1.5 audit reports; and
7.1.6 insurance records.

7.2 Operational Information, including:
7.2.1 budget reports;
7.2.2 monthly reports; and
7.2.3 minutes of management meetings.

7.3 Business Strategy Information, including:
7.3.1 business plan;
7.3.2 budget reports;
7.3.3 minutes of board meetings;
7.3.4 monthly reports; and
7.3.5 annual reports.

7.4 Assets, including:
7.4.1 asset register;
7.4.2 bank account reconciliations;
7.4.3 debtors’ information; and
7.4.4 share certificates.

7.5 Liabilities, including:
7.5.1 general ledger; and
7.5.2 loan agreements.

7.6 Marketing, including:
7.6.1 business plan; and
7.6.2 communication plans.

7.7 Information Technology, including:
7.7.1 asset register;
7.7.2 IT usage register;
7.7.3 software licenses;
7.7.4 repair and maintenance records;
7.7.5 software programmes; and
7.7.6 software records.

7.8 Human Resources, including:
7.8.1 HR policies and procedures;
7.8.2 employment equity reports;
7.8.3 skills development reports;
7.8.4 contracts of employment;
7.8.5 payroll data; and
7.8.6 employee records.

7.9 Management, including:
7.9.1 records of management meetings.

7.10 Client care, including:
7.10.1 client contracts;
7.10.2 client review records;
7.10.3 status reports; and
7.10.4 call reports.

7.11 Contractual relationships, including:
7.11.1 contracts with clients;
7.11.2 leases;
7.11.3 HP agreements; and
7.11.4 shareholders’ agreements.

7.12 Quality, including:
7.12.1 ISO accreditation and manuals.

7.13 Company Organisational structure, including:
7.13.1 organogram; and
7.13.2 shareholders’ agreements.

7.14 Company secretarial, including:
7.14.1 statutory documents;
7.14.2 board resolutions;
7.14.3 share certificates;
7.14.4 minute book;
7.14.5 company registers; and
7.14.6 audited results.

7.15 Investor Relations, including:
7.15.1 general investor relations communications.

8. THE REQUEST PROCEDURE
8.1 Forms and fees

8.1.1 A request for information must be made in the prescribed form, a copy of which is annexed hereto as Appendix 1, must be addressed to the head of the private body and must be submitted with the prescribed fee.

8.1.2 The prescribed request form and details regarding the prescribed fees are available from the head of the private body and from the South African Human Commission and from the Information Regulator, whose contact details are set out above.

8.2 Form of request

8.2.1 The requester must use the prescribed form to make the request for access to a record. This must be made to the head of the private body. This request must be made to the address, facsimile number or electronic mail address of the body concerned.

8.2.2 The requester must provide sufficient detail on the request form to enable the head of the private body to identify the record and the requester. The requester should also indicate which form of access is required. The requester should indicate if it requires notice of the decision of the head of the private body in any manner, other than in writing.

8.2.3 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
8.2.4 If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the head of the private body.

8.3 Fees

8.3.1 A requester who seeks access to a record containing personal information must pay the required request fee, if any.

8.3.2 The head of the private body must by notice, require the requester to pay the prescribed fee, if any, before further processing the request.

8.3.3 The requester may lodge an application to the high court relating to the payment of the request fee.

8.3.4 After the head of the private body has made a decision on the request, the requester must be notified in the required form.

8.3.5 If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.

**PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013**

We process personal information that is necessary to enable us to provide our various products and services. Below are the various categories of personal information we collect and who we share personal information with.

**Meltwater South Africa Pty Ltd**

<table>
<thead>
<tr>
<th>Category</th>
<th>Data subject categories and their personal information</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>General public: general enquiries and viewing the company website; name, e-mail address</td>
</tr>
<tr>
<td></td>
<td>Media: records of media interactions</td>
</tr>
<tr>
<td></td>
<td>Recipients of personal information</td>
</tr>
<tr>
<td></td>
<td>Law enforcement</td>
</tr>
<tr>
<td></td>
<td>Purchasers on the sale or other substantial transfer of all of the business of Meltwater or the Meltwater group of companies</td>
</tr>
<tr>
<td></td>
<td>Operators (service providers)</td>
</tr>
<tr>
<td>Subject</td>
<td>Category</td>
</tr>
<tr>
<td>---------</td>
<td>----------</td>
</tr>
<tr>
<td>Data subject categories and their personal information</td>
<td>Employees (potential, current and previous)</td>
</tr>
<tr>
<td>Recipients of personal information</td>
<td>Operators (service providers)</td>
</tr>
<tr>
<td></td>
<td>Pension funds</td>
</tr>
<tr>
<td></td>
<td>Insurance companies</td>
</tr>
<tr>
<td></td>
<td>Medical aid schemes</td>
</tr>
<tr>
<td></td>
<td>Industry bodies</td>
</tr>
<tr>
<td></td>
<td>Statutory authorities</td>
</tr>
<tr>
<td></td>
<td>Meltwater affiliates</td>
</tr>
<tr>
<td></td>
<td>Purchasers on the sale or other substantial transfer of all of the business of Meltwater or the Meltwater group of companies</td>
</tr>
<tr>
<td></td>
<td>Law enforcement</td>
</tr>
</tbody>
</table>

Security measures to protect personal information

We use reasonable security methods to protect data that is provided to us and resides on our servers. Our security measures include:

- Physical security measures
- Access control measures
- Internal security measures
- Cyber security measures
- Anti-virus measures
- Installing security firewalls
- Password control
- Training programmes on information security
- Information security audits
- IT-related company policies
- Cyber security measures
- Anti-virus measures
- Installing security firewalls
- Password control
- Training programmes on information security
- Information security audits
- IT-related company policies

For more information on how we process personal information, please see our privacy policy available at https://www.meltwater.com/en/privacy.

9. OTHER INFORMATION REQUIRED BY LEGISLATION
The Minister of Justice and Constitutional Development has not made any regulations in this regard.

10. AVAILABILITY OF THE MANUAL
10.1 This manual is available for inspection at Meltwater’s physical address (principal place of business) and website, free of charge.

10.2 A copy of this manual can be obtained from the South African Human Rights Commission, until 30 June 2021.

10.3 The request forms and fee structure can be obtained via the South African Human Rights Commission’s website until 30 June 2021 and from the Information Regulator from 1 July 2021, details of which are set out above, or via the website of the Department of Justice and Constitutional Development, which website can be accessed using the universal resource locator: www.doj.gov.za.
APPENDIX 1

FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

Section 53(1) of the Promotion of Access to Information Act 2 of 2000

A. PARTICULARS OF PRIVATE BODY

<table>
<thead>
<tr>
<th>Name of Private Body:</th>
<th>Meltwater</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration No:</td>
<td>[●]</td>
</tr>
</tbody>
</table>

| The Head:          | [●]       |
| Physical Address:  | [●]       |
| Postal Address:    | [●]       |
| Telephone:         | [●]       |
| Telefacsimile:     | [●]       |
| E-Mail:            | [●]       |

B. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD

| Full names and surname: | ____________________________ |
| Identity Number:        | ____________________________ |
| Postal Address:         | ____________________________ |
| Telephone Number:       | ____________________________ |
| E-Mail address:         | ____________________________ |
| Capacity in which request is made, when made on behalf of another person: | ____________________________ |
C. PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: ________________________________________________
Identity Number: _______________________________________________________

D. PARTICULARS OF RECORD

(a) 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.

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

Description of record or relevant part of the record: ________________________________
Reference number, if available: ________________________________
Any further particulars of record: ____________________________________________

E. FEES

(a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.

(b) You will be notified of the amount required to be paid as the request fee.

(c) 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.

(d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees: __________________________________________
______________________________________________________________________________
______________________________________________________________________________
______________________________________________________________________________
F. FORM OF ACCESS TO RECORD

If you are prevented by an impediment or disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

<table>
<thead>
<tr>
<th>Disability:</th>
<th>Form in which record is required:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Mark the appropriate box with an “X”:

NOTES:

(a) Compliance with your request in the specified form may depend on the form in which the record is available.

(b) Access in the form requested may be refused in certain circumstances. In such case you will be informed if access will be granted in another form.

(c) 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
   (this includes photographs, slides video recordings, computer-generated images, sketches, etc.):
   - View the images
   - Copy of the images*
   - Transcription of the images*

3. If record consists of recorded words or information which can be reproduced in sound:
   - Listen to the soundtrack
     (audio cassette)
   - Transcription of soundtrack
     (written or printed document)*

4. If record is held on computer or in an electronic or machine-readable form:
   - Printed copy of record*
   - Printed copy of information derived from the record*
   - Copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?

**Postage is payable.**

YES | NO
G. PARTICULARS OF 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 the additional folios.

1. Indicate which right is to be exercised or protected:

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

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

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

H. NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved/denied. If you wish to be informed 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?

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

Signed at ___________________________ this ______ day of __________________ 20__.

________________________________________________________________________

SIGNATURE OF REQUESTER/PERSON ON WHOSE BEHALF REQUEST IS MADE