



PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

Version 1.0

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Promotion of Access to Information (PAIA) Manual compiled in terms of Section 51 of the Promotion of Access to Information Act, 2000 (as amended)

» 1. DEFINITIONS, ABBREVIATIONS AND ACRONYMS

Unless the context clearly indicates otherwise, the following terms shall have the meanings assigned to them hereunder, namely –

1.1 Organisations and Roles

Abbreviation / Word	Definition
DIO	Deputy Information Officer
Information Officer	The Information Officer of Scan Global Logistics duly appointed and authorised in terms of PAIA and POPIA, responsible for ensuring compliance with the provisions of these Acts.
Scan Global Logistics	Scan Global Logistics SA (Pty) Ltd

1.2 Legislation and Regulatory Authorities

Abbreviation / Word	Definition
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

1.3 POPIA Terminology

Abbreviation / Word	Definition
Data Subject	The person to whom personal information relates, as defined in POPIA.
Personal Information	Has the meaning assigned to it in section 1 of POPIA and includes any information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person.
Processing	Any operation or activity concerning personal information, including collection, receipt, recording, organisation, storage, updating, retrieval, use, dissemination, distribution or destruction, as contemplated in POPIA.
Record	Any recorded information, regardless of form or medium, in the possession or under the control of Scan Global Logistics, whether created by Scan Global Logistics or not.

1.4 Access Requests

Abbreviation / Word	Definition
Manual	Manual published in compliance with Section 51 of the Act.
Request	A request for access to a record held by Scan Global Logistics in terms of PAIA.
Requester	Any person making a request for access to a record held by Scan Global Logistics and includes a person acting on behalf of another person.

Unless a contrary intention clearly appears:

- words importing the singular include the plural and vice versa;
- words importing any gender include all genders; and
- references to natural persons include juristic persons and vice versa.

Any term not defined in this Manual shall have the meaning ascribed to it in PAIA and, where applicable, POPIA.

» 2. INTRODUCTION

This Manual is prepared in accordance with Section 51 of PAIA and incorporates the requirements introduced by POPIA.

The purpose of this Manual is to:

- Provide information regarding the records held by Scan Global Logistics;
- Explain how a Requester may request access to Records held by Scan Global Logistics;
- Identify categories of Records that are available without the need to submit a formal PAIA request;
- Describe categories of Records available in terms of applicable legislation;
- Provide the contact details of the Information Officer responsible for administering requests under PAIA and POPIA;
- Explain how to access the PAIA Guide published by the Regulator;
- Describe the categories of Personal Information Processed by Scan Global Logistics;
- Identify the categories of Data Subjects whose Personal Information is Processed;
- Identify recipients or categories of recipients to whom Personal Information may be disclosed;
- Describe any cross-border transfers of Personal Information, where applicable; and

- Provide information regarding the measures implemented by Scan Global Logistics to safeguard the confidentiality, integrity and availability of Personal Information.

» 3. COMPANY PARTICULARS

Company Name:	Scan Global Logistics SA (Pty) Ltd
Registration Number:	2021/607092/07
Legal Form:	Private Company ((Pty) Ltd)
Physical Address and Postal Address:	20 Woodlands Drive Building 18, Ground Floor Woodlands Office Park Woodmead Johannesburg 2196 South Africa
Telephone number:	+45 32 48 00 00
Website:	https://www.scangl.com/

» 4. DESCRIPTION OF THE COMPANY

We are a global, asset-light freight forwarding and logistics provider operating across multiple transport modes, including air, ocean, road and rail. We deliver end-to-end supply chain solutions supported by value-added logistics services and project-based operations.

Founded in 1975, we employ more than 5,100 employees and serve approximately 29,000 customers globally across a wide range of industries, including Aid and Relief, Automotive, Fashion and Retail, Pharma and Healthcare, and Renewables.

We operate through a global network spanning 61 countries across Europe, the Middle East and Africa, Asia, the Pacific, North America, Latin America, and the Nordics. This global footprint enables us to support international supply chains by combining local expertise with global reach.

» 5. INFORMATION OFFICER

Information Officer

Name:	Pernille Andersen
Position:	Group Compliance Officer
Email:	peand@scangl.com
Telephone:	+45 78713445

Appointment Date: August 15, 2026

Deputy Information Officer

Name:	Ranvir Gopichund
Email:	ragop@scangl.com
Telephone:	+27 842252493

» 6. INFORMATION REGULATOR GUIDE

Under PAIA, the Regulator has published a guide to help people understand their rights under PAIA and the procedures to follow when requesting access to Records.

The guide contains information regarding:

- the purpose of PAIA;
- how to submit a request for access to Records;
- the assistance available from the Regulator;
- the remedies available where a request for access is refused; and
- other rights and obligations contemplated in PAIA.

The PAIA Guide is available from the Regulator and may be obtained from:

Information Regulator (South Africa)

Website: <https://info regulator.org.za>

» 7. RECORDS AVAILABLE WITHOUT FORMAL REQUEST

The following records are generally available without the need to submit a formal PAIA request, subject to availability and applicable legal restrictions:

Corporate Information

- Company profile and corporate information
- Company brochures and marketing material
- Information published on the Company's website
- Public announcements and press releases

Governance and Compliance Information

- Published policies and notices
- Privacy notices and data protection information
- Regulatory disclosures required by law
- Published ESG, sustainability and corporate responsibility information

Services Information

- Information relating to services offered by Scan Global Logistics

- General information relating to logistics, freight forwarding and supply chain services

Publicly Available Information

- Information made publicly available through the Company's website
- Information filed with regulatory authorities where public access is permitted
- Any other information expressly made available to the public by Scan Global Logistics

» 8. RECORDS HELD IN TERMS OF OTHER LEGISLATION

Scan Global Logistics maintains records in accordance with, amongst others, the following legislation:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Competition Act 89 of 1998
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Customs and Excise Act 91 of 1964
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- National Environmental Management Act 107 of 1998
- National Road Traffic Act 93 of 1996
- Occupational Health and Safety Act 85 of 1993
- PAIA
- POPIA
- Skills Development Act 97 of 1998
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

The above list is not exhaustive and may be amended from time to time to reflect applicable legal and regulatory requirements.

» 9. RECORDS HELD BY THE COMPANY**Corporate Records**

- Registration documents
- Corporate governance documentation
- Board, shareholder and management records

- Policies and procedures

Financial Records

- Accounting records
- Banking records
- Financial statements
- Tax documentation

Human Resources Records

- Employee files
- Employment contracts
- Payroll records
- Recruitment records
- Training records

Customer Records

- Customer contracts
- Customer communications and correspondence
- Freight forwarding and logistics records
- Shipment documentation

Supplier Records

- Procurement records
- Supplier agreements
- Supplier due diligence records

Compliance and Legal Records

- Regulatory compliance records
- Risk management records
- Litigation and dispute records
- Records relating to PAIA and POPIA compliance

Customs and Trade Compliance Records

- Customs declarations
- Import and export documentation
- Trade compliance records
- Sanctions screening records

Information Technology Records

- Business continuity and disaster recovery records
- Information security records
- Network and system monitoring logs

- System audit logs
- User access records
- Website and application logs
- IT asset and software licensing records
- Records relating to electronic communications and system usage

Marketing Records

- Customer communications
- Marketing materials
- Newsletter subscriptions

» 10. REQUEST PROCEDURE UNDER PAIA**10.1 How to Make a Request for Access to Records**

Any Requester may request access to Records held by Scan Global Logistics in accordance with PAIA and the applicable regulations.

10.2. Submission of Requests

Requests for access to Records must:

- be submitted using the prescribed PAIA Request Form (Form 2);
- contain all information required in terms of PAIA; and
- be submitted to the Information Officer using the contact details set out in this Manual.

The prescribed Form 2 is available from the Regulator's website:

Website: <https://info regulator.org.za>

10.3. Response Timeframes**10.3.1. Initial Response Time**

The Information Officer shall, within 30 days of receipt of a Request, decide whether to grant or refuse access to the requested Record and notify the Requester accordingly.

10.3.2. Extension of Time

The 30-day period may be extended for an additional period permitted under PAIA where:

- the request relates to a large number of Records;
- the search for the requested Records requires additional time;
- consultation with a third party is required; or
- additional time is necessary to determine whether to grant access.

The Requester will be notified in writing of any extension and the reasons therefor.

10.4. Third-Party Records

Where a request relates to a Record containing information relating to a third party, the Information Officer may be required to consult with the relevant third party before making a decision on the request.

10.5. Request fees

Fees may be payable for requests for access to Records in accordance with PAIA and the applicable regulations.

Where a fee is payable, the Requester will be notified of the amount and payment method before processing the request.

» 11. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

Access to Records may be refused where permitted by PAIA, including where disclosure would result in:

- Unreasonable disclosure of Personal Information relating to a third party;
- Disclosure of confidential commercial information;
- Disclosure of legally privileged information;
- Prejudice to the safety of individuals or the protection of property;
- Prejudice to commercial, financial or operational interests of Scan Global Logistics; or
- Any other ground for refusal contemplated in PAIA.

Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

» 12. REMEDIES AVAILABLE IN CASES WHERE A REQUEST WAS REFUSED

Where a request for access to a Record is refused, whether in whole or in part, the Requester will be notified in writing of the decision and the reasons for such refusal, unless PAIA provides otherwise.

- A Requester who is dissatisfied with the decision may:
- Lodge a complaint with the Regulator in accordance with the procedures prescribed under PAIA and POPIA;
- Request further information regarding the reasons for the refusal, where permitted by law; or
- Apply to a court of competent jurisdiction for appropriate relief in accordance with PAIA.

The Regulator may investigate complaints and, where appropriate, make findings or recommendations under its statutory powers.

Nothing in this Manual limits a Requester's right to seek any remedy available under PAIA, POPIA or any other applicable law.

Further information regarding complaints may be obtained from the Regulator through its website: <https://info regulator.org.za>

» 13. RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

If Scan Global Logistics is unable to locate a Record requested under PAIA, the Information Officer shall take all reasonable steps to locate the Record.

Where the Record cannot be found or does not exist, the Requester will be notified accordingly and provided with such information as may be available regarding the circumstances under which the Record could not be located.

A statement or affidavit may be provided by the Information Officer confirming that the Record cannot be found or does not exist, where required by PAIA.

Records are retained and disposed of in accordance with applicable legal, regulatory and business requirements.

» 14. PROCESSING OF PERSONAL INFORMATION POPIA

Scan Global Logistics Processes Personal Information for the following purposes:

- Provision of logistics and freight forwarding services;
- Customer administration and relationship management;
- Customs clearance and customs brokerage services;
- Supplier and vendor management;
- Human resources and employment administration;
- Compliance with legal and regulatory obligations;
- Information security and fraud prevention;
- Financial administration and accounting;
- Business operations and management.

Categories of Data Subjects whose Personal Information may be Processed include:

- Employees and job applicants;
- Customers and customer representatives;

- Suppliers, service providers and their representatives;
- Visitors to Company premises;
- Website users; and
- Other business contacts.

Categories of Personal Information that may be Processed include:

- Identification and contact information;
- Employment-related information;
- Financial and banking information;
- Customer and supplier information;
- Communication records;
- Information relating to logistics and freight forwarding services; and
- Electronic information, including system access and website usage information.

Personal Information may be disclosed to:

- Carriers;
- Customers;
- Suppliers and service providers;
- Customs authorities and other regulatory authorities;
- Professional advisers;
- Insurance Providers;
- External Legal Advisors;
- IT Service Providers;
- Financial institutions;
- Members of the Scan Global Logistics Group; and
- Other parties where required by law or necessary for business operations.

Section 15 of this Manual sets out further information on cross-border transfers.

Scan Global Logistics implements reasonable technical and organisational measures to protect Personal Information against loss, unauthorised access, disclosure, alteration or destruction.

»» 15. CROSS-BORDER TRANSFERS

Where necessary for business, operational, legal or administrative purposes, Personal Information may be transferred to recipients located outside South Africa.

Recipients may include:

- Scan Global Logistics Group entities;
- Cloud service providers;
- Technology service providers;
- Logistics partners;
- Professional advisers; and
- Other third parties engaged in connection with the provision of services or business operations.

Such transfers may take place to countries where Scan Global Logistics Group operates, including countries within the European Union, the United States, and other jurisdictions where business activities are conducted.

Where Personal Information is transferred outside South Africa, Scan Global Logistics will take appropriate steps to ensure that such transfers are undertaken in accordance with POPIA and that adequate safeguards are in place to protect the Personal Information.

» 16. SECURITY SAFEGUARDS

Scan Global Logistics has implemented appropriate technical and organisational measures to protect Personal Information against accidental or unlawful destruction, loss, unauthorised access, disclosure, alteration or use.

Such measures include:

- Access controls;
- Encryption technologies;
- Data backup and recovery procedures;
- Confidentiality obligations applicable to employees and service providers;
- Information security policies and standards;
- Incident management and breach response procedures; and
- User access monitoring and system audit controls.

» 17. RIGHTS OF DATA SUBJECTS

Subject to applicable law, Data Subjects may exercise the following rights in relation to their Personal Information:

- The right to request access to Personal Information;
- The right to request correction of inaccurate or incomplete Personal Information;

- The right to request the deletion or destruction of Personal Information where permitted by law;
- The right to object to the Processing of Personal Information in certain circumstances;
- The right to withdraw consent where Processing is based on consent; and
- The right to lodge a complaint with the Regulator.

Requests relating to the exercise of these rights may be submitted to the Information Officer using the contact details provided in this Manual.

»» 18. PROOF OF IDENTITY

To protect Personal Information and prevent unauthorised disclosure, Scan Global Logistics may require proof of identity before granting access to a Record or responding to a request relating to Personal Information.

»» 19. AVAILABILITY OF THIS MANUAL

This Manual is available:

- at the offices of Scan Global Logistics;
- on the Company's website;
- upon request from the Information Officer;
- in electronic format upon request; and
- to the Regulator upon request.

A copy of this Manual may be obtained by contacting the Information Officer using the contact details provided in this Manual.

»» 20. VERSION CONTROL

Compiled on: September 2026

Review Frequency: Annual

Next Scheduled Review: September 2027

Date: 10.09.2026



Pernille Andersen
Information Officer