

Company Name: JWN Marketing (Pty) Ltd
T/A Jewellers Network

Registration Number: 2011/121397/07

Information Officer: Jacoline Nelson

1. Introduction

This Manual is compiled in accordance with Section 51 of the Promotion of Access to Information Act, 2000 ("PAIA"). The purpose of the Manual is to provide information regarding the categories of records held by JWN Marketing (Pty) Ltd T/A Jewellers' Network ("the Company"), the manner in which access to those records may be requested, and the processes followed by the Company in considering such requests. The Manual further supports the Company's commitment to transparency, accountability and compliance with applicable legislation, including the Protection of Personal Information Act, 2013 ("POPIA"). This Manual should be read by any person seeking access to records held by the Company or seeking information regarding the manner in which personal information is processed.

2. Company Details

The Company is a specialist jewellery industry publication and business networking platform operating within South Africa. The Company provides industry news, educational content, advertising opportunities, membership services, referral networking services, newsletter communications and digital engagement through its website and social media channels. Through these activities, the Company creates and maintains various records required for the operation and administration of its business.

Physical Address: Plot 19 Portion 2 Watercome Road, Chartwell West, Farmall.

Postal Address: PO BOX 525, Fourways North, 2055.

Website: www.jewellersnetwork.co.za

Email Address: sales@jewellersnetwork.co.za

Telephone Number: (010) 030-0888

3. Information Officer

The Company has appointed an Information Officer in accordance with the requirements of PAIA and POPIA. The Information Officer is responsible for ensuring compliance with applicable legislation relating to access to information and the lawful processing of personal information. The Information Officer receives and manages requests for access to records, oversees the Company's privacy compliance programme, attends to complaints and enquiries relating to personal information and serves as the Company's liaison with the Information Regulator.

Information Officer: Jacoline Nelson

Position: Information Officer

Email Address: sales@jewellersnetwork.co.za

Telephone Number: (010) 030-0888

4. Information Regulator

The Information Regulator is responsible for monitoring compliance with PAIA and POPIA and for assisting members of the public in exercising their rights under these Acts. Individuals who require guidance regarding access to information, personal information requests or complaints relating to privacy matters may contact the Information Regulator directly.

Website: www.inforegulator.org.za

Email: enquiries@inforegulator.org.za

Email: PAIAComplaints@inforegulator.org.za

A guide explaining how to exercise rights under PAIA is available from the Information Regulator.

5. Records Held by the Company

In the ordinary course of its business operations, the Company creates, receives, stores and maintains various categories of records. These records are retained in both electronic and physical formats and are used for operational, commercial, legal and regulatory purposes.

The Company maintains corporate records relating to its incorporation, governance, statutory obligations, regulatory compliance, licences, policies and operational procedures. These records support the ongoing management and administration of the business.

Records relating to members and subscribers are maintained to facilitate membership services, newsletter distribution, industry communications and engagement activities. Such records may include membership applications, subscription details, contact information, communication preferences, payment records and correspondence between the Company and its members.

The Company maintains records relating to advertisers, sponsors and business partners who utilise the Company's print, digital and promotional platforms. These records may include advertising agreements, artwork approvals, campaign information, invoices, correspondence and records relating to promotional activities.

Financial and accounting records are maintained to support the Company's commercial operations and legal obligations. These records may include invoices, quotations, receipts, bank records, accounting ledgers, tax records, financial statements and audit documentation.

Supplier and service provider records are retained in order to manage relationships with third parties who support the Company's operations. Such records may include contracts, quotations, service agreements, procurement records, payment information and business communications.

Where applicable, the Company maintains employment and human resources records relating to employees, contractors and consultants. These records may include employment contracts, payroll records, leave records, recruitment documentation, performance records and disciplinary records.

The Company also maintains information technology, cybersecurity and operational records relating to the management of its digital platforms, systems and services. These records may include website logs, security reports, access records, cookie information, analytics data, backup records and system maintenance documentation.

6. Records Relating to Digital Platforms, Membership Services and Referral Activities

As part of its business model, the Company operates digital platforms that facilitate interaction between jewellery industry professionals, members, advertisers and other stakeholders. The Company therefore maintains records associated with online registrations, profile creation, member participation, referral opportunities and digital communications.

Records may include member profiles, referral submissions, networking interactions, introductions, recommendations, contact requests, event registrations, webinar registrations, online enquiry submissions and communications exchanged through the Company's platforms.

The Company may also maintain records relating to newsletter subscriptions, campaign engagement data, website interactions and responses to marketing communications.

Where referrals are facilitated through the Company's platforms, records relating to those referrals may be retained for operational, administrative, quality assurance and dispute resolution purposes.

7. Records Available Without a Formal Request

Certain records and information are made publicly available and may be accessed without the need to submit a formal request in terms of PAIA. Such information generally includes content published on the Company's website, publicly available magazine articles, newsletters, media releases, marketing materials, company policies that are made public, social media content and general corporate information.

The availability of public information does not create any obligation on the Company to disclose confidential, proprietary or legally protected information.

8. Records Available Upon Request

Access to records that are not publicly available may be requested in accordance with the provisions of PAIA. Requests are considered on a case-by-case basis and will be assessed in light of the nature of the record requested, the rights of affected parties and any legal restrictions applicable to the requested information.

Records that may be requested include certain membership records, subscriber information relating to the requester, transaction records, communications, agreements, supplier records and operational records. Access to such records will only be granted where the requirements of PAIA have been satisfied and where no lawful grounds for refusal exist.

The Company reserves the right to withhold records where disclosure is prohibited by law, where disclosure would infringe the rights of another person, where confidential commercial information may be compromised, or where disclosure would prejudice the legitimate interests of the Company or another party.

9. Processing of Personal Information

Jewellers' Network recognises the importance of protecting personal information and processes such information in accordance with POPIA.

Personal information is collected and processed only for lawful and legitimate purposes relating to the operation of the Company's business activities.

The Company may process personal information for purposes including membership administration, newsletter and publication distribution, referral facilitation, networking services, event management, advertising and sponsorship services, customer relationship management, industry communications, marketing activities, website administration, regulatory compliance and the fulfilment of contractual obligations.

Appropriate technical and organisational safeguards are implemented to protect personal information against loss, unauthorised access, misuse, alteration or unlawful disclosure. Personal information is retained only for as long as necessary to fulfil the purpose for which it was collected or as required by law.

10. Request Procedure

A person wishing to obtain access to a record held by the Company must submit a request in writing using the prescribed request form attached as Appendix A to this Manual. The request should contain sufficient information to enable the Information Officer to identify both the requester and the specific records being requested.

Upon receipt of a valid request, the Information Officer will evaluate the application and determine whether the requested records may be disclosed in terms of PAIA. The Company shall acknowledge and process requests within the periods prescribed by law. Applicable request fees and reproduction fees may be charged where permitted by PAIA.

11. Grounds for Refusal of Access

The Company may refuse access to records where the requested information falls within a ground for refusal recognised by PAIA. Refusal may be necessary where disclosure would result in an unreasonable invasion of personal privacy, reveal confidential commercial information, disclose trade secrets, prejudice contractual obligations, compromise intellectual property rights or undermine legal proceedings.

Access may also be refused where disclosure would threaten the security of the Company's systems, expose confidential business information, prejudice regulatory compliance obligations or otherwise adversely affect the legitimate interests of the Company or a third party.

12. Remedies Available to Requesters

Where a requester is dissatisfied with the outcome of a request for access to information, the requester may lodge a complaint with the Information Regulator. A requester may also exercise any remedies available through a court of competent jurisdiction as provided for under PAIA.

The Company encourages requesters to engage with the Information Officer in order to address concerns or obtain clarification before pursuing formal dispute-resolution mechanisms.

13. Availability of this Manual

This Manual is available on the Company's website and may be obtained directly from the Information Officer upon request. Electronic copies may be supplied where requested and where reasonably practicable.

The Company reserves the right to amend or update this Manual from time to time in order to ensure continued compliance with legislative requirements and alignment with its operational activities.

Contact Details

All requests for access to information and all enquiries relating to this Manual should be directed to:

Information Officer: Jacoline Nelson

JWN Marketing (Pty) Ltd

T/A Jewellers Network

Plot 19 Portion 2 Watercome Road, Chartwell West, Farmall.

Email: sales@jewellersnetwork.co.za

Tel: (010) 030-0888

Website: www.jewellersnetwork.co.za

Appendix A – PAIA Request for Information Form

In terms of the Promotion of Access to Information Act, 2000 (Act 2 of 2000)

Company Name: JWN Marketing (Pty) Ltd

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Registration Number: 2011/121397/07

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1. Particulars of Requester:

Full Name/Registered Name:	
Identity Number/Registration Number:	
Contact Number:	
Email Address:	

If request is made on behalf of another person, proof of authority must be attached.

2. Particulars of Records Requested:

Please provide sufficient details to identify the records requested:

3. Form of Access Required (tick applicable)

- ☐ Inspection of record
- ☐ Paper copy
- ☐ Electronic copy
- ☐ Other (please specify) _____

4. Preferred Language

- ☐ English
- ☐ Afrikaans
- ☐ Other: _____

5. Notice of Decision

Please notify me of the decision regarding this request at:

- ☐ Email _____
- ☐ Postal Address _____

6. Declaration

I declare that the information provided is accurate and that I am aware that access to certain records may be refused in terms of applicable legislation.

Signature: _____

Date: _____