

FRJ-PAIA-001

Promotion of Access to Information Manual

Free Range Jewels (Pty) Ltd

Document Information

Item	Details
Document Title	Promotion of Access to Information Manual
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Disclaimer

This Manual has been prepared in accordance with the requirements of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"). Its purpose is to facilitate access to information held by Free Range Jewels (Pty) Ltd in accordance with the provisions of PAIA.

Nothing contained in this Manual creates contractual rights or obligations beyond those imposed by applicable legislation.

1. Purpose

The purpose of this Manual is to:

- give effect to the constitutional right of access to information held by private bodies where such information is required for the exercise or protection of any rights;
- describe the categories of records held by Free Range Jewels (Pty) Ltd;
- explain how requests for access to records may be made;
- provide sufficient information to assist persons wishing to request access to records held by the Company; and
- promote transparency and accountability in the Company's information management practices.

This Manual has been prepared in accordance with the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and should be read together with other applicable legislation, including the Protection of Personal Information Act, 4 of 2013 ("POPIA"), where relevant.

2. Company Details

Item	Details
Company Name	Free Range Jewels (Pty) Ltd
Registration Number	2019/080443/07
VAT Number	4370249007
Physical Address	24 Somerset Square, Highfield Road, Green Point
Telephone	021 418 3607
Email	info@freerangejewels.co.za
Website	www.freerangejewels.co.za

3. Information Officer

The Information Officer appointed in terms of PAIA and POPIA is:

Item	Details
Name	Marelé Lamprecht
Position	Director
Telephone	021 418 3607
Email	info@freerangejewels.co.za

No Deputy Information Officer has been appointed.

The Information Officer is responsible for:

- overseeing compliance with PAIA and POPIA;
 - receiving and processing requests for access to records;
 - dealing with privacy-related enquiries;
 - promoting responsible information management within the Company; and
 - ensuring that this Manual is maintained and reviewed periodically.
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4. Guide on How to Use PAIA

Section 10 of PAIA requires the Information Regulator to make available a guide to assist persons wishing to exercise their rights under the Act.

The guide explains, among other things:

- the purpose of PAIA;

- how to submit a request for access to records;
- the assistance available from the Information Regulator;
- the remedies available where access is refused; and
- any applicable fees or prescribed forms.

The current guide and related information are available from the official website of the Information Regulator.

5. Nature of Business

Free Range Jewels (Pty) Ltd is engaged in the design, manufacture and sale of fine jewellery to direct retail customers, trade clients and its online store.

In the ordinary course of business, the Company processes personal information relating to employees, customers, suppliers, contractors and other persons where reasonably necessary to conduct its operations and comply with applicable legal obligations.

6. Records Available in Terms of Other Legislation

The Company maintains records in accordance with various South African laws applicable to its operations. Access to these records will be granted where required by the relevant legislation and subject to any applicable restrictions.

Legislation that may require the Company to retain records includes, where applicable:

- Basic Conditions of Employment Act, 75 of 1997
- Companies Act, 71 of 2008
- Compensation for Occupational Injuries and Diseases Act, 130 of 1993
- Employment Equity Act, 55 of 1998
- Income Tax Act, 58 of 1962
- Labour Relations Act, 66 of 1995
- Occupational Health and Safety Act, 85 of 1993
- Promotion of Access to Information Act, 2 of 2000
- Protection of Personal Information Act, 4 of 2013
- Skills Development Act, 97 of 1998
- Tax Administration Act, 28 of 2011
- Unemployment Insurance Act, 63 of 2001
- Value-Added Tax Act, 89 of 1991

This list is not exhaustive and may change as legislation is amended or new legislation becomes applicable.

7. Categories of Records Held by the Company

The Company maintains records in the ordinary course of business, including but not limited to the following categories.

7.1 Corporate Records

1. Certificate of Incorporation
2. Memorandum of Incorporation
3. Company registration documents
4. Statutory records
5. Minutes and resolutions
6. Shareholder records
7. Director records

7.2 Financial and Accounting Records

1. Annual financial statements
2. Accounting records
3. Bank records
4. Tax records
5. VAT records
6. Invoices
7. Payment records

7.3 Employment and Human Resources Records

1. Employment contracts
2. Payroll records
3. Leave records
4. Personnel files
5. Disciplinary records
6. Training records
7. Health and safety records
8. Employment-related correspondence

7.4 Customer Records

1. Customer account information

2. Quotations
 3. Sales records
 4. Orders
 5. Customer contracts
 6. Delivery information
 7. Customer correspondence
 8. Warranty and repair records, where applicable
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7.5 Supplier and Contractor Records

1. Supplier information
 2. Contractor information
 3. Supplier agreements
 4. Purchase records
 5. Service agreements
 6. Related correspondence
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7.6 Operational Records

1. Product information
 2. Inventory records
 3. Manufacturing records
 4. Operational procedures
 5. Business correspondence
 6. Marketing records
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7.7 Information Technology Records

1. Website records
 2. Website enquiries
 3. System logs
 4. Electronic communications
 5. User access records, where applicable
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8. Records Available Without a PAIA Request

Certain information may be made available without the need to submit a formal request under PAIA.

Such information may include:

1. information published on the Company's website;
2. publicly available product and service information;
3. promotional and marketing material;
4. publicly available contact details; and
5. any other information that the Company voluntarily makes available.

The availability of such information may change from time to time without notice.

9. Processing of Personal Information

In the ordinary course of its business, the Company processes personal information relating to:

1. employees;
2. customers;
3. suppliers;
4. contractors; and
5. website visitors.

Personal information is processed only where reasonably necessary for legitimate business purposes or where required by law.

The Company processes personal information for purposes that include:

1. supplying products and services;
2. processing customer orders;
3. managing customer relationships;
4. administering employment relationships;
5. managing supplier relationships;
6. complying with legal and regulatory obligations;
7. maintaining financial and accounting records; and
8. operating and improving its business.

Where personal information is transferred outside South Africa, the Company will do so only where permitted by applicable law and where reasonably necessary for its business operations.

10. Request Procedure

A person requesting access to a record held by the Company must submit a request to the Information Officer in the manner prescribed by PAIA.

A request should contain sufficient information to enable the Information Officer to:

1. identify the record being requested;
2. identify the requester;
3. determine the form of access required;
4. establish the right that the requester seeks to exercise or protect, where applicable; and
5. communicate the outcome of the request.

Requests should be submitted using the prescribed PAIA request form together with any information reasonably required to process the request.

Completed requests may be submitted to:

Information Officer

Free Range Jewels (Pty) Ltd

Email: info@freerangejewels.co.za

Telephone: 021 418 3607

The Company will consider each request in accordance with PAIA and will respond within the time periods prescribed by the Act.

11. Fees

Request fees and access fees may be payable in accordance with PAIA where applicable.

The Information Officer will advise a requester if any prescribed fee is payable before the request is processed.

No fee will be charged where PAIA provides otherwise.

12. Grounds for Refusal of Access

Access to records may be refused where permitted by PAIA.

Grounds for refusal may include, but are not limited to:

1. protection of the privacy of another person;
2. protection of confidential commercial information;
3. protection of legally privileged information;
4. protection of the safety of individuals or property;
5. protection of records relating to legal proceedings; or
6. where disclosure is otherwise prohibited by law.

Each request will be considered on its own merits in accordance with PAIA.

13. Availability of this Manual

This Manual is available:

1. on the Company's website;
2. from the Information Officer upon request; and
3. in any other manner required by applicable legislation.

Reasonable charges may apply for printed copies where permitted by law.

14. Review of this Manual

The Company may review and update this Manual from time to time to reflect:

1. changes in legislation;
2. changes in business operations;
3. changes in record-keeping practices; or
4. any other matter considered necessary.

The latest version of the Manual will replace all previous versions.

15. Complaints

Any person who believes that their rights under PAIA or POPIA have not been properly observed may contact the Information Officer in the first instance.

Where appropriate, complaints may also be referred to the Information Regulator in accordance with applicable legislation.

Information regarding complaint procedures is available from the official website of the Information Regulator.

Appendix A

How to Request Access to Records

1. Complete the prescribed PAIA request form.
2. Submit the completed request to the Information Officer using the contact details contained in this Manual.
3. Provide sufficient information to identify:
 1. the requester;
 2. the record requested; and
 3. the right to be exercised or protected, where applicable.
4. Pay any prescribed request fee if applicable.

5. The Company will consider the request in accordance with PAIA and communicate its decision within the prescribed time period.
 6. If access is granted, arrangements will be made for access to the record in the form permitted by PAIA.
 7. If access is refused, the requester will be informed of the reasons for the refusal and of any remedies available under PAIA.
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Contact Details

Free Range Jewels (Pty) Ltd

24 Somerset Square
Highfield Road
Green Point

Telephone: 021 418 3607

Email: info@freerangejewels.co.za

Website: www.freerangejewels.co.za

FRJ-PRIV-001

Privacy Policy

Free Range Jewels (Pty) Ltd

Document Information

Item	Details
Document Title	Privacy Policy
Document Number	FRJ-PRIV-001
Document Owner	Information Officer
Classification	Public
Effective Date	30 June 2026
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1. Introduction

Free Range Jewels (Pty) Ltd ("the Company", "we", "our" or "us") respects the privacy of every individual whose personal information it processes.

This Privacy Policy explains how we collect, use, store, disclose and protect personal information in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA") and other applicable South African laws.

By using our website, purchasing our products, making enquiries or otherwise interacting with us, you acknowledge that your personal information may be processed as described in this Privacy Policy.

2. Company Details

Item	Details
Company Name	Free Range Jewels (Pty) Ltd
Registration Number	2019/080443/07
Physical Address	24 Somerset Square, Highfield Road, Green Point
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Email	info@freerangejewels.co.za
Website	www.freerangejewels.co.za

3. Information We Collect

Depending on your interaction with us, we may collect and process personal information including:

- name and surname;
- identity or passport number where required;
- date of birth where required;
- telephone number;
- email address;
- physical and postal address;
- delivery address;
- billing information;
- payment information processed through authorised payment service providers;
- order history;
- communication records;
- preferences relating to products or services; and
- any other information voluntarily provided by you.

We may also collect certain technical information when you visit our website, including:

- IP address;
 - browser type;
 - device information;
 - website usage information; and
 - cookies and similar technologies.
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4. How We Collect Information

Personal information may be collected when you:

- purchase products;
- request quotations;
- create an online account;
- subscribe to communications;
- contact us by telephone or email;
- complete website forms;
- participate in promotions or competitions;
- apply for employment; or
- otherwise communicate with us.

We may also receive information from service providers or other third parties where permitted by law.

5. Why We Process Personal Information

We process personal information for purposes including:

- providing products and services;
- processing and delivering customer orders;
- communicating with customers;
- responding to enquiries;
- administering customer accounts;
- processing payments;
- managing warranties, repairs and returns;
- complying with legal and regulatory obligations;
- maintaining accounting and business records;
- improving our products and services;
- managing employment relationships; and
- protecting our legitimate business interests.

Personal information will only be processed where there is a lawful basis for doing so.

6. Sharing of Personal Information

The Company does not sell personal information.

Personal information may be shared where necessary with:

- payment service providers;
- banks and financial institutions;
- courier and delivery service providers;
- information technology service providers;
- professional advisers, including accountants, auditors and legal advisers;
- regulatory authorities;
- government departments; and
- other service providers where reasonably necessary for the operation of the Company's business.

The Company will take reasonable steps to ensure that third parties processing personal information on its behalf do so in accordance with applicable legal requirements.

7. International Transfers

From time to time, the Company may process orders for customers located outside South Africa.

Where necessary, personal information may be transferred outside South Africa for the purpose of fulfilling customer orders or where otherwise permitted by applicable law.

The Company will take reasonable steps to ensure that any such transfers are carried out in accordance with POPIA.

8. Security of Personal Information

The Company takes reasonable technical and organisational measures to protect personal information against:

- unauthorised access;
- loss;
- misuse;
- alteration;
- disclosure; and
- destruction.

Although reasonable safeguards are implemented, no method of electronic transmission or storage is completely secure. Accordingly, the Company cannot guarantee absolute security.

9. Retention of Personal Information

Personal information is retained only for as long as:

- required for the purpose for which it was collected;
- required by law;
- necessary for legitimate business purposes; or
- required to protect or exercise legal rights.

When personal information is no longer required, it will be securely deleted or destroyed where reasonably practicable.

10. Your Rights

Subject to applicable law, you may have the right to:

- request access to your personal information;
- request correction of inaccurate or incomplete information;
- request deletion of personal information where appropriate;
- object to certain processing activities;
- withdraw consent where processing is based on consent; and
- lodge a complaint with the Information Regulator.

Requests relating to personal information should be directed to the Information Officer using the contact details contained in this Policy.

11. Marketing Communications

The Company may send marketing communications where permitted by law.

You may opt out of receiving marketing communications at any time by following the unsubscribe instructions contained in the communication or by contacting the Company directly.

The Company will honour such requests as soon as reasonably practicable.

12. Cookies

The Company's website may use cookies and similar technologies to improve functionality, analyse website usage and enhance the user experience.

You may configure your browser to refuse cookies, although certain features of the website may not function correctly if cookies are disabled.

13. Third-Party Websites

The Company's website may contain links to third-party websites.

The Company is not responsible for the privacy practices or content of those websites and encourages users to review the privacy policies of any third-party websites they visit.

14. Changes to this Privacy Policy

The Company may amend this Privacy Policy from time to time.

Any updated version will replace previous versions and will become effective from the date of publication.

The latest version will be available on the Company's website.

15. Contact Information

If you have any questions regarding this Privacy Policy or the processing of your personal information, please contact:

Information Officer

Free Range Jewels (Pty) Ltd

24 Somerset Square
Highfield Road
Green Point

Telephone: 021 418 3607

Email: info@freerangejewels.co.za

Website: www.freerangejewels.co.za