



**TRONOX MINERAL SANDS PROPRIETARY LIMITED
TRONOX KZN SANDS PROPRIETARY LIMITED
("TRONOX")**

PAIA AND POPIA MANUAL

December 2024

A copy of the manual will be available for inspection at Tronox South Africa's Corporate Office and is available on the company website at www.tronox.com

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1 INTRODUCTION

Tronox Holdings plc is a vertically integrated mining and inorganic chemical business. The company mines and processes titanium ore, zircon, and other minerals, and manufactures titanium dioxide pigments that add brightness and durability to paints, plastics, paper, and other everyday products. Tronox KZN Sands (Pty) Ltd and Tronox Mineral Sands (Pty) Ltd are wholly owned subsidiaries of Tronox Holdings plc, operating the

Tronox Mineral Sands (Pty) Ltd - TC01 (CPC Smelter & Services), HM02 (Centurion) & NS01 (All of Namakwa) Tronox KZN Sands (Pty) Ltd - HM01 (FB Mine & CPC MSP).

The South African Tronox entities mine and beneficiate heavy minerals to produce titanium dioxide feedstock (chloride and sulphate grades), zircon, rutile, and high-purity iron products. Final products are dispatched globally to either Tronox's pigment operations or third-party customers.

All references to Tronox in this manual should be considered as references to the entities, Tronox KZN Sands (Pty) Ltd and Tronox Mineral Sands (Pty) Ltd respectively.

2 TRONOX DETAILS

(Information to be provided in terms of section 51(1)(a) of PAIA)

Name:	Tronox Mineral Sands Pty Ltd and Tronox KZN Sands Pty Ltd
Physical Address:	262 Rose Avenue, Wild Pear Office Park, Dooringkloof, 1597, South Africa.
Information officer:	Bronwyn Parker
	General Counsel Tronox South Africa
	bronwyn.parker@tronox.com
	+27 83 253 76 58

3 GUIDE ON HOW TO USE PAIA & POPIA MANUAL

- 3.1** As part of its operations and services, Tronox holds certain records (information and documents), including personal information. The Promotion of Access to Information Act 2 of 2000 ("PAIA") and the Protection of Personal Information Act 4 of 2013 ("POPIA") provide for certain records and/or information to be accessed where certain circumstances are met and in accordance with certain procedures and at prescribed fees, giving effect to the right of access to information in terms of the Constitution of the Republic of South Africa.
- 3.2** This PAIA and POPIA Manual ("the Manual") (which includes all annexures and amendments thereto as made available by Tronox from time to time) has been prepared in accordance with section 51 of PAIA as read with POPIA. It provides an overview of the records (information and documents) held by Tronox and details of how such records may be accessed, including in relation to giving effect to the rights granted under POPIA terms of which a data subject may access its personal information, object to processing and request the correction of any of its personal information held by Tronox.
- 3.3** Tronox may amend this manual from time to time. It is available and accessible at www.tronox.com or on request to Tronox's designated Information Officer (being the person duly authorised by Tronox to act in this capacity).
- 3.4** Tronox has appointed an Information Officer in accordance with POPIA. In addition to its obligations prescribed under POPIA, the designated Information Officer is also responsible for assessing any requests to Tronox for access to information in terms of PAIA as well as to oversee any other obligations that Tronox may have under PAIA. The Information Officer may appoint Deputy Information Officers to assist it in the fulfillment of its obligations.
- 3.5** PAIA establishes the following statutory rights of requesters to any record of a private body if -
- 3.5.1** that record is required for the exercise or protection of any of his or her legal rights;
- 3.5.2** that requester complies with all the procedural requirements; and

3.5.3 access is not refused in terms of any ground referred to in the Act.

3.5.4 In terms of the Act, private bodies are required to publish a manual to assist requesters who request access to a record.

3.6 Availability of the Tronox Manual and Entry Point for Access

3.6.1 A copy of this Manual is available to the public in a PDF ("**Portable Document Format**") version on the website of Tronox at www.tronox.com or on request from the Information Officer referred to in this Manual.

3.6.2 Tronox endorses the spirit of PAIA and POPIA and believes that this Manual will assist requesters in exercising their rights.

3.7 Who May Request Information?

3.7.1 The Act provides that a requester is only entitled to access to a record if the record is required for the exercise or protection of a right. Only requests for access to a record, where the requester has satisfied the Information Officer that the record is required to exercise or protect a right, will be considered.

3.7.2 A requester may act in different capacities in requesting a record. This will influence the amount to be charged when a request has been lodged.

3.7.3 Requesters may make a request as –

3.7.3.1 a personal requester who requests a record about him/herself;

3.7.3.2 an agent requester who requests a record on behalf of someone else;

3.7.3.3 a third-party requester who requests a record about someone else; and

3.7.3.4 a public body that may request a record if -

- it fulfills the requirements of procedural compliance.

- the record is required for the exercise or protection of a right; and
- no grounds for refusal exist in the Act.

3.8 Policy concerning Confidentiality of Information

Tronox will protect the confidentiality of all information belonging to third parties that is in Tronox's possession or under its control. Before divulging any such third-party information, Tronox will provide the third party the opportunity to (i) consent to the access (in whole or subject to redaction of sensitive information) or (ii) deny access to the information in terms of any applicable law.

3.9 SAHRC Guidance to Requesters

3.9.1 The South African Human Rights Commission (SAHRC) has issued a guide on how to use the Act (as prescribed by section 10 of PAIA) and is available on the SAHRC website (<https://www.sahrc.org.za/index.php/understanding-paia>). This Manual complies with the requirements of the guide and recognises that the Information Regulator established under POPIA will be responsible for regulating compliance with PAIA, POPIA, and their regulations.

3.9.2 You may also request any additional information to assist you in making a request from the SAHRC or the Information Regulator.

PAIA	POPIA
South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041 Telephone: +27 11 887 3600 Email: paia@sahrc.org.za	Information Regulator Physical address: JD House 27 Siemens Street Braamfontein, Johannesburg 2001 Postal address: P.O Box 31533 Braamfontein Johannesburg 2017 Email Complaints: complaints.IR@justice.gov.za General enquiries: inforeq@justice.gov.za

3.9.3 You may also request any additional information to assist you in making a request from the SAHRC.

4 CLASSES OF RECORDS

4.1 RECORDS WHICH ARE FREELY AVAILABLE (SECTION 51(1)(C) OF PAIA)

The following records are automatically available to the general public and need not be requested in accordance with the procedure outlined in this Manual:

- brochures;
- information available on Tronox's website
- documentation and information relating to Tronox which is held by the Companies and Intellectual Properties Commission in accordance with the requirements set out in set out in section 25 of the Companies Act 71 of 2008.

4.2 RECORDS HELD BY TRONOX IN TERMS OF OTHER LEGISLATION (SECTION 51(1)(D) OF PAIA)

Records are kept in accordance with such other legislation as applicable which includes, but is not limited to –

- Basic Conditions of Employment Act, No. 75 of 1997;
- Companies Act, No. 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993;
- Consumer Protection Act, No. 68 of 2008;
- Copyright Act, No. 98 of 1978;
- Electronic Communications and Transactions Act, No. 25 of 2002;
- Employment Equity Act, No. 55 of 1998;
- Financial Intelligence Centre Act, No. 38 of 2001;
- Income Tax Act, No. 58 of 1962;
- Labour Relations Act, No. 66 of 1995;
- Medical Schemes Act, No. 131 of 1998;
- National Credit Act, No. 34 of 2005;
- Occupational Health and Safety Act, No. 85 of 1993; Pension Funds Act, No. 24 of 1956;

- Long Term Insurance Act 52 of 1998;
- Magistrates Court Act 32 of 1944;
- Mine Health and Safety Act 29 of 1996;
- Mineral Petroleum Resources Development Act 28 of 2002;
- National Environmental Management Act 107 of 1998;
- Non-Profit Organisations Act 71 of 1997;
- Occupational Diseases in Mines and Works Act 78 of 1973;
- Occupational Health and Safety Act 85 of 1993;
- Patents Act 57 of 1987;
- Protection of Personal Information Act, No.4 of 2013;
- Prevention of Organised Crime Act 14 of 1998;
- Regulation of Interception of Communications and Provision of Communication Related Information Act 70 of 2002;
- Securities Services Act 36 of 2004;
- Short Term Insurance Act. 53 of 1998;
- Skills Development Act 97 of 1998;
- Skills Development Levies Act 97 of 1999;
- South African Revenue Service Act 34 of 1997;
- Statistics Act 6 of 1999;
- Supreme Court Act 59 of 1959;
- Unemployment Insurance Act 63 of 2001; and
- Value Added Tax Act 89 of 1991.

4.2.1 Although we have used our best endeavours to supply you with a list of applicable legislation the above list may be incomplete.

4.2.2 Wherever it comes to our attention that existing or new legislation allows a requester access on a basis other than that set out in the Act, we shall update the list accordingly.

4.3 RECORDS HELD BY TRONOX (SECTION 51(1)(E) OF PAIA)

4.3.1 Corporate Affairs and Investor Relations / Communications

- Media Releases;
- Newsletters and Publications.

4.3.2 Secretariat and Governance

- Applicable Statutory Documents;
- Annual Reports;
- Board of Directors identity and contact information;
- Codes of Conduct;
- Legal Compliance Records;
- Memorandum of Incorporation;
- Minutes of Board of Directors Meetings;
- Minutes of Shareholders' Meetings;
- Policies and Procedures;
- Share Certificates;
- Shareholder Agreements;
- Share Registers;
- Statutory Returns to Relevant Authorities;

4.3.3 Corporate Social Investment ("CSI")

- Charitabe Request;
- CSI Projects and Investments;
- CSI Performance Information;

4.3.4 Finance and Taxation

- Accounting Records;
- Annual Financial Statements;
- Audit Reports;
- Capital Expenditure Records;
- Investment Records;
- Invoices and Statements;
- Management Reports;
- PAYE Records;
- Purchasing Records;
- Sale Records;
- Supply Records;
- Tax Records and Returns;
- Treasury Dealing;
- Transactional Records;
- VAT Records.

4.3.5 Human Resources

- Education and Training Records;
- Employee Benefit Records;
- Employment Contracts;
- Employment Equity Records;
- Group HR Policies and Procedures;
- Labour Relations Records;
- Leave Records;
- Medical Records;
- Personnel Information;
- Retirement Benefit and Medical Aid Records;
- UIF Returns;
- Statutory Employee Records.

4.3.6 Information Management

- Contracts and Agreements;
- Information Policies, Standards, Procedures and Guidelines

4.3.7 Insurance

- Claim Records;
- Details of insurance coverages, limits, and insurers;
- Insurance Policies.

4.3.8 Legal

- General legal correspondence;
- Leases;
- Licenses and Approvals;
- Property Records;
- Trademarks;

4.3.9 Marketing and Communication

- Marketing Brochures;
- Marketing Strategies;

4.3.9.1 Operations and Technical

- Access Control Records;

- Administration Documentation;
- Agreements;
- Divisional Accounting Records;
- Production Statistics;
- Resource and Reserve Statements;
- Strategic and Mine Plans;
- Technical Records;

4.3.10 Safety, Health, Environment And Sustainability

- Environmental Assessment Records;
- Incident reports and investigations;
- Licenses and Approvals;
- Charter Compliance Information;
- Safety, Health, Environment and Sustainability Policies and Management Standards;
- Philosophy and Strategy;
- Safety and Environmental Statistics;
- Sustainability Information;
- Training Records;

4.3.11 Supply Chain Management

- Agreements with Contractors and Suppliers;
- Contractor and Supplier Data.

5 PROCESS FOR REQUESTING ACCESS TO INFORMATION

5.1 Any requests for access to records of Tronox are subject to PAIA and, in respect of personal information, POPIA.

5.2 In terms of PAIA, an access request is to be made on the prescribed form accessible at <https://inforegulator.org.za/> with a copy being set out in Annexure A to this Manual. The request is to be made to the Information Officer addressed to the contact details set out above (section 53(1) of PAIA).

5.3 The requester must provide sufficient detail on the form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required and specify a postal address, fax number in the Republic, or email address. The requester should also indicate if, in addition to a written reply, any other

manner is to be used to inform the requester and state the necessary particulars to be so informed (section 53(2)(a) and (b) and (c) and (e) of PAIA).

- 5.4** The requester must identify the right that is sought to be exercised or protected and explain why the requested record is required for the exercise or protection of that right (section 53(2)(d) of PAIA).
- 5.5** In circumstances where the access request is being made on behalf of another person, the requestor is obliged to prove the capacity in which the request is being made, with any submissions in support thereof being subject to the satisfaction of Tronox (section 53(2)(f) of PAIA).
- 5.6** Section 71 of the PAIA makes provision for a request for information or records about a third party. In considering such a request, Tronox will adhere to the provisions of sections 71 to 74 of the Act.
- 5.7** The requestor is to note the provisions of Chapter 5 of Part 3 of PAIA in terms of which Tronox is obliged, in certain circumstances, to advise third parties of requests lodged in respect of information applicable to or concerning such third parties.
- 5.8** In addition, the provisions of Chapter 2 of Part 4 of PAIA entitle third parties to dispute the decisions of Tronox by referring the matter to the High Court.
- 5.9** The Information Officer will decide on whether or not to grant the request as soon as is reasonably possible and notify the requester accordingly.

5.10 Guidance On Completion Of Prescribed Access Form (Section 51(1)(E))

- 5.10.1 For Tronox to facilitate your access to a record you need to complete the prescribed access form attached as Annexure A.
- 5.10.2 Please take note that the prescribed form must be completed in full, failure to do so will result in the process being delayed. Tronox will not be held liable for delays caused by incomplete forms. Due cognisance should be taken of the following instructions when completing the access form because the Information Officer will not process a request for access to a record until satisfied that all requirements have been met –
 - 5.10.2.1 the Access Request Form must be completed in the English language;
 - 5.10.2.2 proof of identity is required to authenticate the identity of the requester. If the requester acts as an agent, the requester must provide proof of the identity of the person on whose behalf the request is made, the authority or mandate given to the requester by such person, and proof of the identity of the requester as provided above;
 - 5.10.2.3 type or print in BLOCK LETTERS an answer to every question;

- 5.10.2.4 if a question does not apply, state "N/A" in response to that question;
- 5.10.2.5 if there is nothing to disclose in reply to a particular question, state "nil" in response to that question;
- 5.10.2.6 if there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional attached folio;
- 5.10.2.7 when the use of an additional folio is required, precede each answer thereon with the title applicable to that question.
- 5.10.3 Submission Of Prescribed Access Form: The completed access form may be submitted either via conventional mail, e-mail, or fax and must be addressed to the Information Officer.

5.11 Payment Of Prescribed Fees

5.11.1 Payment details can be obtained from the Information Officer and payment can be made either via a direct deposit, by bank-guaranteed cheque, or by postal order (no credit card payments are accepted). Proof of payment must be supplied.

5.11.2 The Act provides for four types of fees –

- **Request fee:** an initial, non-refundable R57.00 (incl. VAT) is payable on submission. This fee does not apply to Personal Requesters, referring to any person seeking access to records that contain their personal information;
- **Reproduction fee:** this fee is payable with respect to all records that are automatically available;
- **Access fee:** if the request for access is successful an access fee may be required to reimburse Tronox for the costs involved in the search, reproduction, and/or preparation of the record and will be calculated based on the Prescribed Fees;

Deposit: a deposit of one-third (1/3) of the amount of the applicable access fee, is payable if Tronox receives a request for access to information held on a person other than the requester himself/herself and the preparation for the record will take more than six (6) hours. If access is refused to the requested record, the full deposit will be refunded to the requester.

5.11.3 Reproduction fees

The applicable fees (excluding VAT) for reproduction as referred to above are:	Rand
For every photocopy of an A4–size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic form	0.75
For a copy in a computer-readable form on Compact disc	70.00
A transcription of visual images, for an A4-size page or part thereof	40.00
For a copy of visual images	60.00
A transcription of an audio record, for an A4-size page or part thereof	20.00
For a copy of an audio record	30.00

5.11.4 Request fee

A request fee of R57.00 (excluding VAT) is payable upfront when a requestor submits a request for access to information on behalf of anyone else.

5.11.5 Access fee

The applicable fees (excluding VAT) which will be payable are:	Rand
For every photocopy of an A4–size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic form	0.75
For a copy in a computer-readable form on Compact disc	70.00
A transcription of visual images, for an A4-size page or part thereof	40.00
For a copy of visual images	60.00
A transcription of an audio record, for an A4-size page or part thereof	20.00
For a copy of an audio record	30.00
To search a record that must be disclosed, per hour or part of the hour	30.00

5.11.6 Postage fee

Where a requester requires that a copy of the record needs to be posted to him/her, the actual postal fee is payable in addition to the applicable fees.

6 NOTIFICATION

- 6.1** Tronox will within thirty (30) days of receipt of the request decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 6.2** The thirty (30) day period within which Tronox has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty (30) days, if the request is for a large volume of information, or the request requires a search for information held at another office of Tronox and the information cannot be reasonably be obtained within the original thirty (30) day period. Tronox will notify the requester in writing should an extension be sought.
- 6.3** If the request for access to a record is **successful** the requester will be notified of the following –
- 6.3.1 the amount of the access fee payable upon gaining access to the record;
- 6.3.2 an indication of the form in which the access will be granted.
- 6.3.3 If the request for access to a record is **not successful** the requester will be notified of the following –
- adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal); and
 - that the requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.
- 6.4 Records that cannot be found** or do not exist: If Tronox has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

7 REFUSAL OF ACCESS TO RECORDS

- 7.1** The thirty (30) day period within which the Information Officer is required to reply to a request, as stipulated in the Act, shall commence only once a requester has complied with all the requirements of the Act in requesting access to a record, to the satisfaction of the Information Officer.
- 7.2** Requests may be refused on the following grounds, as set out in the Act –

- 7.2.1 mandatory protection of privacy of a third party who is a natural person, including a deceased person, which would involve the unreasonable disclosure of personal information of that natural person;
- 7.2.2 mandatory protection of commercial information of a third party or Tronox, if the record contains –
 - 7.2.2.1 trade secrets of the third party;
 - 7.2.2.2 financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party or Mineral Sands; and
 - 7.2.2.3 information disclosed in confidence by a third party to Tronox if the disclosure could put that third party at a disadvantage in negotiations or commercial competition:
- 7.2.3 mandatory protection of certain confidential information of a third party if disclosure of the record would result in a breach of a duty of confidence owed to that party in terms of an agreement;
- 7.2.4 mandatory protection of the safety of individuals, and the protection of property;
 - 7.2.4.1 mandatory protection of records privileged from production in legal proceedings, unless the legal privilege has been waived; and
- 7.2.5 mandatory protection of research information of a third party and Tronox.

8 APPEAL

If a requester is aggrieved by the refusal of the Information Officer to grant a request for a record, the requester may, within thirty (30) days of notification of the Information Officer's decision, apply to court for appropriate relief.

9 PROTECTION OF PERSONAL INFORMATION

- 9.1 Chapter 3 of POPIA provides for the minimum conditions for lawful "processing" of "personal information" by a "responsible party" (as such terms are defined under POPIA). These conditions may not be derogated unless specific exclusions apply as outlined in POPIA.
- 9.2 Tronox requires personal information relating to both natural and legal persons to carry out its business and organisational functions. The manner in which this information is processed and the purpose for which it is processed is determined by Tronox. Accordingly, Tronox is a responsible party for the purposes of POPIA and will ensure that the personal information of a "data subject" (as defined in POPIA), amongst other things as prescribed by POPIA:

- 9.2.1 is processed lawfully, fairly, and transparently. This includes the provision of appropriate information to data subjects when their data is collected by Tronox, in the form of privacy or data collection notices. Tronox must also have a legal basis (for example, but not limited to consent) to process personal information;
- 9.2.2 is processed only for the purposes for which it was collected;
- 9.2.3 will not be processed for a secondary purpose unless that processing is compatible with the original purpose;
- 9.2.4 is adequate, relevant, and not excessive for the purposes for which it was collected;
 - 9.2.4.1 is accurate and kept up-to-date
 - 9.2.4.2 will not be kept for longer than necessary
 - 9.2.4.3 is processed in accordance with integrity and confidentiality principles – this includes physical and organisational measures to ensure that personal Information, in both physical and electronic form, is subject to an appropriate level of security when stored, used, and communicated by Tronox, to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage
 - 9.2.4.4 is processed in accordance with the rights of data subjects, where applicable.

9.3 Data Subject Rights

Data Subjects have the right to:

- 9.3.1 be notified that their personal information is being collected by Tronox. The data subject also has the right to be notified in the event of a data breach;
- 9.3.2 know whether Tronox holds personal information about them and to access that information. Any request for information must be handled in accordance with the provisions of this PAIA Manual;
- 9.3.3 request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained personal information;
- 9.3.4 object to Tronox's use of their personal information and request the deletion of such personal information (deletion would be subject to Tronox's record keeping requirements);
- 9.3.5 object to the processing of personal information for purposes of direct marketing by means of unsolicited electronic communications; and
- 9.3.6 complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or their personal information.

9.4 Purpose of the Processing of Personal Information by Tronox

As noted above, personal information held by Tronox can only be processed for a specific purpose. The purpose for which Tronox processes or will process personal information is set out in section of **A of Annexure B** to this Manual, provided however that this is not an exhaustive list.

9.5 Categories of Data Subjects and Personal Information relating thereto

In terms of section 1 of POPIA, a data subject may either be a natural or a juristic person. The various categories of Data Subjects that Tronox processes personal information in respect of and the types of personal information relating thereto including but is not limited to those detailed in **section B of Annexure B** to this Manual.

9.6 Sharing of Personal Information

Tronox may share a data subject's Personal Information in accordance with **section C of Annexure B** to this Manual.

9.7 Cross-border flows of Personal Information

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- 9.7.1 recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
- 9.7.2 data subjects' consent to the transfer of their personal information;
- 9.7.3 or transfer is necessary for the performance of a contractual obligation between the data subject and the responsible party; or
- 9.7.4 transfer is necessary for the performance of a contractual obligation between the responsible party and a third party, in the interests of the data subject; or
- 9.7.5 the transfer is for the benefit of the data subject, and it is not reasonably practicable to obtain the consent of the data subject, and if it were, the data subject, would in all likelihood provide such consent.

Planned cross-border transfers of personal information and the justifications therefor includes but is not limited to those detailed in **section D of Annexure B** to this Manual.

9.8 Description of information security measures to be implemented by Tronox

Section E of Annexure B to this Manual sets out the types of security measures to be implemented by Tronox in order to ensure that personal information is respected and protected. This is not an exhaustive list and is subject to change. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by Tronox may be conducted in order to ensure that the personal information that is processed by Tronox is safeguarded and processed in accordance with the Conditions for Lawful Processing under POPIA.

9.9 Objection to the Processing of Personal Information by a Data Subject

Section 11(3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the processing of his/her/its personal information in the prescribed form attached to this manual as **Annexure C** subject to exceptions contained in POPIA.

9.10 Request for correction or deletion of Personal Information

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a data subject may request for their personal information to be corrected/deleted in the prescribed form attached as **Annexure D**.

ANNEXURE A –

ACCESS FORM

REQUEST FOR ACCESS TO A RECORD OF MINERAL SANDS

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

A. Particulars of private body

Contact details:	
Chief Executive Officer (as defined in the Act)	
Information Officer	
Postal address	
Physical address	
Phone number	
Fax number	
E-mail address	

B. Particulars of person requesting access to the record

(a)	<i>The particulars of the person who requests access to the record must be recorded below.</i>
(b)	<i>Furnish an address and/or fax number in the Republic of South Africa to which information must be sent.</i>
(c)	<i>Proof of identity is required from both the requester and any person or any party acting on behalf of the requester. The original identity document or such other proof satisfactory to the Chief Executive Officer or Information Officer will need to be presented with this request by the requester or the requester's representative before the request will be processed.</i>
(d)	<i>If the request is made on behalf of another person, proof of the capacity in which the request is made, is also to be presented with this request.</i>

Details of requester

Surname	
Full names	
Identity number	
Postal address	
Telephone number	
Fax number	
E-mail address	

If a request is made on behalf of another person the requester is obliged to identify him/herself and to provide proof of the mandate under which the request is made, to the satisfaction of the Information Officer.

C. Particulars of person on whose behalf request is made

Surname	
Full names	
Identity number	

D. Particulars of record

(a)	<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.</i>
(b)	<i>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.</i>
(c)	<p><i>The requester's attention is drawn to the grounds on which the private body must or may refuse access to a record (in certain instances this may be mandatory, in others it may be discretionary) –</i></p> <ul style="list-style-type: none"> <i>• mandatory protection of the privacy of a third party who is a natural person (human being);</i> <i>• mandatory protection of commercial information of third party;</i> <i>• mandatory protection of certain confidential information of a third party;</i> <i>• mandatory protection of the safety of individuals, and the protection of property;</i> <i>• mandatory protection of records privileged from production in legal proceedings;</i> <i>• commercial information of a private body;</i>

	<ul style="list-style-type: none"> • <i>mandatory protection of research information of a third party and a private body.</i>
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E. Description of record or relevant part of the record

Category	Description of record

F. Fees

<i>(a)</i>	<i>A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee (currently R50.00) has been paid.</i>
<i>(b)</i>	<i>If the prescribed request fee is amended you will be notified of the amount required to be paid as the request fee.</i>
<i>(c)</i>	<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 an prepare a record.</i>
<i>(d)</i>	<i>If you qualify for exemption of the payment of any fee, please state the reason therefore.</i>

The requester qualifies for an exemption in payment of fees (mark the appropriate box)	Yes	No
Reason		

G. Form of access to record

<i>If you are prevented by a 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.</i>	
Disability	
Form in which record is required?	
<p><i>Mark the appropriate box with an "X". Notes:</i></p> <p>(a) <i>Your indication as to the required form of access depends on the form in which the record is available.</i></p> <p>(b) <i>Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</i></p> <p>(c) <i>The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</i></p>	

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 the 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 the record is held on computer or in an electronic or machine-readable form -					
	printed copy of record*		printed copy of information derived		copy in computer readable format*
* If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? A postal fee is payable.				Yes	No

H. 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 requested record is required for the exercising or protection of the aforementioned right

3. 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 thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

4. How would you prefer to be informed of the decision regard your request for access to the record?

Signed at _____ this _____ day of _____ 20_____

**SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE**

ANNEXURE B

A. Purpose of processing:

The purposes for which Tronox processes personal information include but is not limited to:

- (a) rendering of services to our clients;
- (b) employee administration;
- (c) transacting with our suppliers and third party service providers;
- (d) maintaining records;
- (e) recruitment;
- (f) general administration;
- (g) financial requirements;
- (h) compliance with legal and regulatory requirements; and (i) facilities management.

B. Categories of data subjects and associated personal information

Data subject	Personal Information Processed
Employees	ID number, contact details, physical and postal address, date of birth, age, marital status, race, employment history, criminal/background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (including medical aid, pension/ provident fund information), details related to employee performance, disciplinary procedures, employee disability information, employee pension, and provident fund information, employee contracts, employee performance records, payroll records, electronic access records, physical access records, CCTV records, health and safety records, training records, employment history, time and attendance records.

Clients	Natural persons: ID number, information required for FICA compliance, contact details, physical and postal address. Legal persons: Entity name, registration number, VAT number, contact details for representative persons, FICA documentation
Supplier and Service provider	Entity name, registration number, income tax number, tax information, contact details for representative persons, FICA documentation, BBB-EE certificates, invoices, agreements
Directors and Shareholders	Name, surname, ID numbers, other information as required for reporting purposes
Job Applicants	Name, surname, address, contact details, email address, telephone number, details of qualifications, skills, experience and employment history, current remuneration
Website Visitors	Name, email address, company name, job title and telephone number
Visitors	Physical access records, electronic access records, and CCTV records

C. Sharing of Personal Information

Tronox may share personal information with: (a) other companies forming part of Tronox's group of companies located outside of South Africa; (b) service providers who perform services on behalf of Tronox; and (c) third party suppliers.

D. Cross Border Transfer

Tronox may from time to time need to transfer personal information to its group companies, service providers, and other third parties located in a country outside of South Africa, including for the purposes of rendering services to clients or for Tronox administration purposes (including employee administration). Where personal information is transferred outside of

South Africa, Tronox will take steps to ensure that such transfer is subject to laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

E. Information Security Measures

Tronox implements and maintains reasonable technical and organisational measures to protect personal information, including by way of the implementation of policies, procedures, and controls aimed at preventing any unauthorised access to, loss or destruction of personal information. Tronox has a wide range of security measures designed to mitigate data security breaches, accidental loss or destruction of, or damage to, personal information. These include the storage of personal information relating to clients and employees in locked cabinets within the Tronox offices; IT systems such as encryption software, password protection software. Restricted access, levels of authority, and separation of duties are in place for dealing with all personal information. Tronox has and will continue to take steps to ensure that third party providers who process personal information on behalf of Tronox apply appropriate safeguards in compliance with POPIA.

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF
SECTION 11(3) OF POPIA BY DATA SUBJECTS**

Regulations relating to the Protection of Personal Information, 2018

- 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: Data Subjects Details	
Name and Surname	
Residential/Postal Address	
Contact number	
Email Address	
B: Details of Responsible Person	
Name and Surname	
Residential/Postal Address	
Contact number	
Email Address	
C: REASONS FOR OBJECTON IN TERMS OF SECTION 11(1)(D) TO (F)	

Signed at:
Date:
Signature of Requester/person on who's behalf the request is made:

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS
OF SECTION 24(1) OF POPIA**

Regulations relating to the Protection of Personal Information, 2018

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.

Request for: (Mark the appropriate box with an "X".)

- Correction or deletion of the Personal Information about the Data Subject which is in possession or under the control of the Responsible Party.
- Destroying or deletion of a record of Personal Information about the Data Subject which is in possession or under the control of the Responsible Party and who is no longer authorized to retain the record of information.

A: Data Subjects Details	
Name and Surname	
Residential/Postal Address	
Contact number	
Email Address	
B: Details of Responsible Person	
Name and Surname	
Residential/Postal Address	
Contact number	
Email Address	

C: REASONS CORRECTION/DELETION

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Signed at:

Date:

Signature of Requester/person on who's behalf the request is made: