

**PROMOTION OF ACCESS TO INFORMATION ACT
SECTION 51 MANUAL
FOR
PRIMEDIA LIMITED
AND
THE PRIMEDIA GROUP**





1 INTRODUCTION

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000. The Act gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and / or protection of any right.

The reference to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

This manual applies in respect of each member of the **Primedia Group**. The Information Officer named below is appointed in respect of the **Primedia Group** as a whole and in respect of each of the private bodies constituting the **Primedia Group**.

The **Primedia Group** includes various non-South African entities. Only requests for records of the South African incorporated members of the **Primedia Group** are covered by the Manual and requests for information or records of, or relating to, non-South African entities will not be considered.

2 DEFINITIONS

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

- “**Act**” means the Promotion of Access to Information Act, Act 2 of 2000, as amended from time to time;
- “**Information Officer**” means the person acting on behalf of the **Primedia Group** and discharging the duties and responsibilities assigned to the “head” of the **Primedia Group** by the Act. The Information Officer is duly authorised to act as such and such authorisation has been confirmed by the “head” of the **Primedia Group** in writing;
- “**Manual**” means this manual published in compliance with Section 51 of the Act;
- “**Primedia Group**” means the **Primedia Group**, comprising of Primedia Limited and its South African subsidiary and associated companies and associated entities. The South African entities comprising the **Primedia Group** are listed in Annexure 1 to this Manual and this Manual applies to all such South African entities, both jointly and severally, and such entities are referred to both individually and collectively as the “**Primedia Group**”;
- “**Personnel**” means any person who works for or provides services to or on behalf of the **Primedia Group** and receives or is entitled to receive any remuneration. This includes, without limitation, directors (both executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;
- “**Record**” means any recorded information, regardless of form or medium, which is in the possession or under the control of the **Primedia Group**, irrespective of whether it was created by the **Primedia Group**;
- “**Request**” means a request for access to a record of the **Primedia Group**;
- “**Requestor**” means any person, including a public body or an official thereof, making a request for access to a record of the **Primedia Group** and includes any person acting on behalf of that person;
- “**SAHRC**” means the South African Human Rights Commission.



Unless a contrary intention clearly appears, words signifying:-

- the singular includes the plural and vice versa;
- any one gender includes the other genders and vice versa; and
- natural persons include juristic persons.

Terms defined in the Act shall have the same meaning in this Manual.

3 **PRIMEDIA GROUP OVERVIEW**

The **Primedia Group** vision is to develop a world-class media group. It is composed of three coherent business segments. These segments are constituted on the basis of similar target markets and business models.

The three business segments are Advertising (comprising Broadcasting and Internet, Out of Home, Cinema and Print, Commuter Media and Sport) Filmed Entertainment (comprising Cinema Exhibition, Film Distribution and Home Entertainment) and One to One marketing (comprising Online Communications Database Marketing and Fulfilment and Telephony).



The simplified view of the **Primedia Group** and its primary brands is as follows:

ADVERTISING	FILMED ENTERTAINMENT	ONE TO ONE MARKETING
BROADCASTING AND INTERNET 94.7 Highveld Stereo 702 Talk Radio 567 Cape Talk iafrica.com	CINEMA EXHIBITION Ster-Kinekor Theatres FILM DISTRIBUTION Ster-Kinekor Pictures	CLIENT INSIGHT SERVICES Knowledge Factory
OUT OF HOME Primedia Outdoor Primedia Face2Face Primedia Instore	HOME ENTERTAINMENT Ster-Kinekor Home Entertainment	
CINEMA AND PRINT CineMARK Primedia @ Home Primedia Publishing		
COMMUTER MEDIA ComutaNet Rank TV Rank Branding		
SPORT MegaPro Marketing Kaizer Chiefs		

The **Primedia Group** supports the constitutional right of access to information and we are committed to provide you access to our records in accordance with the provisions of the Act, the confidentiality we owe third parties and the principles of our law.



4 AVAILABILITY OF THIS MANUAL

A copy of this Manual is available on our website (www.primedia.co.za) or by sending a request for a copy to the Information Officer by email. The Manual may also be inspected at our head office and the SAHRC at the respective addresses set out below. This Manual will be updated from time to time, as and when required.

5 HOW TO REQUEST ACCESS TO RECORDS HELD BY THE PRIMEDIA GROUP

Requests for access to records held by the **Primedia Group** must be made on the request forms that are available from the SAHRC website (www.sahrc.org.za) or the Department of Justice and Constitutional Development (www.doj.gov.za) (under "regulations").

For the convenience of requestors, copies of such forms are included in the version of this Manual available at our head office and on our website. Please note that requestors are also required to make payment of the prescribed fees. This issue is dealt with more fully below.

Requests for access to records must be made to our Information Officer at the address, fax number or electronic mail address provided for below.

The requester must provide sufficient detail on the request 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 indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

Where you know which company in the **Primedia Group** holds the record/s you are requesting, please indicate the name of the company. Where you are unsure which company holds the record/s please provide as much detail as possible about the record to facilitate our search and to avoid any possible delays.

The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.

If a request is made on behalf of a person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the **Primedia Group** Information Officer.

The standard form that must be used for the making of requests is attached as Annexure 2. . Not using this form could cause your request to be refused (if you do not provide sufficient information or otherwise) or delayed.

The requester is required to pay a fee for evaluating the request and then providing the records requested, including the requirement to pay a deposit in certain circumstances. **The list detailing the prescribed fees payable to the Primedia Group in respect of requests and the fees in respect of access to records (if the request is granted) is attached as Annexure 3.**

Annexures 2 and 3 are included in copies of this Manual available on the **Primedia Group** website and head office but need not and are not included in the copy of this Manual delivered to the SAHRC.

Kindly note that all requests to the **Primedia Group** or any of its constituent companies will be evaluated and considered in accordance with the Act. Publication of this manual and describing the categories and subject matter of information held by the Primedia Group does not give rise to any rights (in contract or otherwise) to access such information or records except in terms of the Act.

6 CONTACT DETAILS

Name of Private Body	The Primedia Group
Designated Information Officer	Paige Atkins
Email address of Information Officer	info@primedialtd.co.za
Postal address	P O Box 652110 Benmore 2010
Street address	Primedia Place 5 Gwen Lane (Cnr Fredman Drive) Sandton 2196
Phone number	011 506 3045
Fax number	011 506 3185

7 HOW TO ACCESS THE GUIDE AS DESCRIBED IN SECTION 10 OF THE ACT

The Guide is in the process of preparation and is expected to be available in August 2003. When available, it can be obtained from the South African Human Rights Commission. Please direct any queries to:

The South African Human Rights Commission:

PAIA Unit

The Research and Documentation Department

Postal address: Private Bag 2700
Houghton
2041

Telephone: +27 11 484-8300

Fax: +27 11 484-0582

Website: www.sahrc.org.za

E-mail: paia@sahrc.org.za

8 VOLUNTARY DISCLOSURE

The **Primedia Group** is not obliged to and has not published a notice in terms of Section 52(2) of the Act. Nevertheless the **Primedia Group** does make certain information freely available, including the most recent Annual Report of Primedia Limited. Other information relating to the **Primedia Group** is freely available on the **Primedia Group** website at www.primedia.co.za. Certain other information relating to the **Primedia Group** is also made available on such website from time to time as well as on various of the other websites operated by the **Primedia Group**.

Certain information is also made available to employees of the **Primedia Group**, which is not generally made available to the public. To avoid confusion, these items of information are not listed here but may be obtained by **Primedia Group** employees from any group HR office.



9 RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

Information is retained in terms of the following legislation and is **usually available only to the persons or entities specified in such legislation:**

Companies Act 61 of 1973

Income Tax Act 58 of 1962

Value Added Tax Act 89 of 1991

Labour Relations Act 66 of 1995

Basic Conditions of Employment Act 75 of 1997

Employment Equity Act 55 of 1998

Skills Development Act 97 of 1998

Skills Development Levies Act 9 of 1999

Unemployment Insurance Act 63 of 2001

Unemployment Contributions Act 4 of 2002

Compensation for Occupational Injuries and Health Diseases Act 130 of 1993

Occupational Health & Safety Act 85 of 1993

Protection of Businesses Act 99 of 1978

Regional Services Councils Act 109 of 1985

Stamp Duties Act 77 of 1968

Stock Exchanges Control Act 1 of 1985 and the rules and listings requirements of the JSE Securities Exchange authorised in terms thereof

Trade Marks Act 194 of 1993

The Independent Broadcasting Authority Act 153 of 1993, the Broadcasting Act 4 of 1999 and the licences issued and the regulations prescribed thereunder.

10 RECORDS HELD BY THE PRIMEDIA GROUP

The **Primedia Group** maintains records on the following categories and subject matters. **However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured.**

All requests for access will be evaluated on a case by case basis in accordance with the provisions of the Act.

The records are divided into those that are generic to the **Primedia Group** and those that relate to specific businesses. Notwithstanding that records relate to a specific business, you must still make your request to the **Primedia Group** Information Officer at the address set out above and not to the business directly.

GENERIC RECORDS

10.1 Internal records

The following are records pertaining to the **Primedia Group's** own affairs and those of its constituent companies:

- Memorandum and Articles of Association
- Financial records
- Operational records
- Intellectual property



- Marketing records;
- Internal correspondence;
- Product records;
- Statutory records;
- Internal policies and procedures;
- Records held by officials of the **Primedia Group**.

10.2 **Personnel records**

Personnel records include the following:

- Any personal records provided to the **Primedia Group** by its personnel;
- Any records a third party has provided to the **Primedia Group** about any of its personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

10.3 **Other Parties**

Records are kept in respect of other parties, including without limitation contractors, Commercial Banks, auditors and consultants, suppliers, joint venture companies and service providers, and general market conditions. In addition, such other parties may possess records which can be said to belong to the **Primedia Group**. The following records fall under this category:

- Personnel, customer, or **Primedia Group** records which are held by another party as opposed to being held by the **Primedia Group**; and
- Records held by the **Primedia Group** pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers.

10.4 **Other Records**

Further records are held including:-

- Information relating to the **Primedia Group**'s own commercial activities; and
- Research information belonging to the **Primedia Group** or carried out on behalf of a third party.

ADVERTISING RELATED RECORDS

10.5 **Listener/Reader/Viewer-related Records**

Listener/Reader/Viewer-related information includes the following:

- Any records a Listener/Reader/Viewer has provided to the **Primedia Group** or a third party acting for or on behalf of the **Primedia Group**;
- Any credit records or other research conducted by the **Primedia Group** in respect of its Listeners/Readers/Viewers or research derived by the **Primedia Group** from its Listeners/Readers/Viewers and their activities;
- Any records a third party has provided to the **Primedia Group** either directly or indirectly; and
- Records generated by or within the **Primedia Group** pertaining to the Listeners/Readers/Viewers.



10.6 **Radio Related Records**

Specific records are held regarding:

- Schedules;
- Content;
- Listener provided records.

10.7 **Publishing Related Records**

Specific records are held regarding:

- Content (for both own and client publications);
- Subscriber provided information.

FILMED ENTERTAINMENT RELATED RECORDS

10.8 **Cinema-attendee-related Records**

Cinema-attendee related information includes the following:

- Any records a cinema-attendee has provided to the **Primedia Group** or a third party acting for or on behalf of the **Primedia Group**;
- Any research conducted by the **Primedia Group** in respect of its cinema-attendees or research derived by the **Primedia Group** from its cinema-attendees and their activities;
- Any records a third party has provided to the **Primedia Group** either directly or indirectly; and
- Records generated by or within the **Primedia Group** pertaining to the cinema-attendees.

10.9 **Filmed Entertainment Related Records**

- Release schedules;
- Products;
- Stock.

ONE TO ONE MARKETING RELATED RECORDS

10.10 **Marketing Related Records**

- Advertisers;
- Prospects.



ANNEXURE 1

THE PRIMEDIA GROUP
Primedia Limited
Primedia Broadcasting (Proprietary) Limited
Cape Talk (Proprietary) Limited
Africa On Air (Proprietary) Limited
Primovie Management (Proprietary) Limited
Primovie Finance (Proprietary) Limited
Ster-Kinekor Films (Proprietary) Limited
Cinemark (Proprietary) Limited
Cinevation (Proprietary) Limited
In-Line Indoor Media (Proprietary) Limited
Beatrixstraat Beleggings (Proprietary) Limited
Primedia Pictures (Proprietary) Limited
VWV Productions (Proprietary) Limited
Itransi (Proprietary) Limited
Look South Records (Proprietary) Limited
Tri-Leisure Communications (Proprietary) Limited
Never Never Land (Proprietary) Limited
Ster-Kinekor Home Entertainment (Proprietary) Limited
Consumer Motivation (Proprietary) Limited
Ster- Moribo Investments (Proprietary) Limited
Ster- Moribo (Proprietary) Limited
Velskoen Inry-teaters (Proprietary) Limited
Western Province Cinemas (Proprietary) Limited
VWV Interactive (Proprietary) Limited
VWV Studios (Proprietary) Limited
Stand 65 Kyalami Park (Proprietary) Limited
Validtrade 168 (Proprietary) Limited
Fresh Water Films (Proprietary) Limited
TCH Visual Communications (Proprietary) Limited
Metropolis Transactive Holdings Limited



Metropolis Transactive (Proprietary) Limited
Kaizer Chiefs (Proprietary) Limited
Chiefs Village Centre (Proprietary) Limited
Chiefs Village (Proprietary) Limited
Motor Inns (Proprietary) Limited
Knowledge Factory (Proprietary) Limited
Intact Solutions (Proprietary) Limited
Fincor Leasing (Proprietary) Limited
Primedia @ Home (Proprietary) Limited
Pamphlets Africa (Proprietary) Limited
Jacaranda Pamphlet Distributors (Proprietary) Limited
Encounter Marketing (Proprietary) Limited
Currie Motors Property Investments (Proprietary) Limited
North Ridge Country Club (Proprietary) Limited
Primedia Publishing (Proprietary) Limited
Trade Up-Front 151 (Proprietary) Limited
George Warman Publications (Proprietary) Limited
VWV Events (Proprietary) Limited
Comuta Net (Proprietary) Limited
Rank Branding (Proprietary) Limited
Go Transit (Proprietary) Limited
Tailormade Creative Media (Proprietary) Limited
Rank TV (Proprietary) Limited
Primedia Sport (Proprietary) Limited
Newshelf 153 (Proprietary) Limited
MegaPro Marketing (Proprietary) Limited
MegaPro Africa (Proprietary) Limited
Tactique Computers (Proprietary) Limited
Signet Licensing & Marketing (Proprietary) Limited
PSM Marketing (Proprietary) Limited
Primedia Outdoor (Proprietary) Limited
Ad Displays Electronic (Proprietary) Limited
Nu-Lite Illuminated Signs (Proprietary) Limited



Primedia Shelter Advertising (Proprietary) Limited
Cartad In-Store Media (Proprietary) Limited
Primedia Face2Face (Proprietary) Limited
DORMANT
Ster-Kinekor Mobile (Proprietary) Limited
lafrica.com (Proprietary) Limited
Newsshelf 611 (Proprietary) Limited
South African Property Transfer Guide (Proprietary) Limited
Spatial Decisions (Proprietary) Limited
Primedia On-Line (Proprietary) Limited
Advantage On-Line (Proprietary) Limited
Property Price Check (Proprietary) Limited
Profound Strategic Information (Proprietary) Limited
Bitglue Software Development (Proprietary) Limited
Atlas Ster Inryteater (Proprietary) Limited
Entertainment Investments (Proprietary) Limited
Fox Holdings (Proprietary) Limited
Germiston Drive-In (Proprietary) Limited
Hunter Street Mansions (Proprietary) Limited
Kempton Inryteater (Proprietary) Limited
Lantern Inryteater (Proprietary) Limited
Rayzelle Investments (Proprietary) Limited
Roslyn Inryteater (Proprietary) Limited
Ster Inryteater Amanzimtoti (Proprietary) Limited
Ster Inryteater Kimberley (Proprietary) Limited
Ster Inryteater Vereeniging (Proprietary) Limited
Ster Teater Eiendomme (Proprietary) Limited
Tweefontein Inry-Teater (Proprietary) Limited
Wonderboom Beleggings (Proprietary) Limited
Newsshelf 527 (Proprietary) Limited
Sextet Investments One (Proprietary) Limited



Sextet Investments Two (Proprietary) Limited
Sextet Investments Three (Proprietary) Limited
Sextet Investments Four (Proprietary) Limited
Sextet Investments Five (Proprietary) Limited
Sextet Investments Six (Proprietary) Limited
ASSOCIATED ENTITIES
Primedia Skills Development, a company incorporated in terms of Section 21 of the Companies Act
The Alexandra Motswedi Centre, a company incorporated in terms of Section 21 of the Companies Act

Please note that several of the above named entities are dormant. In some circumstances the **Primedia Group** continues to trade using the trading name of such dormant entity, but as a division of the **Primedia Group** or one of its constituents. When submitting a request, please provide the Information Officer with as much information as possible about the record and the entity to which it relates when making your request to enable the record to be located quickly and efficiently, should your request be granted.