

PAIA MANUAL

VEHICLE RENTAL

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|-----------------|--|----------------------------------|
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| SECTION | COMPANY SECRETARIAT | Halfway Group Holdings (Pty) Ltd |
| SUB-SEC | PAIA MANUAL | |
| SUBJECT | INFORMATION MANUAL FOR HALFWA IN TERMS OF THE PROMOTION OF AC | . , |

1. LIST OF ACRONYMS AND ABBREVIATIONS

- "CEO" Chief Executive Officer;
- "DIO" Deputy Information Officer;
- "Halfway" Shall mean Halfway Group Holdings (Pty) Ltd (registration number: 2015/274007/07), a private body incorporated in South Africa with subsidiaries and associates as set out in Annexure C;
- "IO" Information Officer;
- "Minister" Minister of Justice and Correctional Services;
- "PAIA" Promotion of Access to Information Act No. 2 of 2000 (as Amended);
- "POPIA" Protection of Personal Information Act No.4 of 2013;
- "Regulator" Information Regulator; and
- "Republic" Republic of South Africa.

2. PURPOSE OF PAIA MANUAL

The purpose of this PAIA Manual is to assist you with the following:

- Provide you with the categories of records held by the various operating entities within the Halfway Group which are available without you having to submit a formal PAIA request;
- Enable you to have a sufficient understanding of how to make a request for access to a record of any operating entity within the Halfway Group, by providing a description of the subjects on which an entity within the Halfway Group holds records and the categories of records held on each subject;

- Provide you with a description of the records held by the various entities within the Halfway Group which are available in accordance with legislation;
- Provide you with a description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- To assist you to understand, that where the entities within the Halfway Group processes personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- Provide you with a description of the categories of data subjects and the information or categories of information relating thereto;
- Provide you with the recipients or categories of recipients to whom the personal information may be supplied;
- To make you aware of instances where an entity within the Halfway Group has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- To make you aware of appropriate security measures the entities within the Halfway Group has in place to ensure the confidentiality, integrity and availability of the personal information which is to be processed.
- This Policy must be read with the Halfway Group Privacy Policy and in particular the details of the Information Officers and Deputy Information Officers will apply to this Policy.

3. SCOPE

The Scope of this policy include entities within the Halfway Group as provided for in Annexure C. Please refer to the Halfway Group Privacy Policy for specific contact details for each operating entity and their respective Information and Deputy Information Officers.

The following entities are expressly excluded from the ambit of this policy:

- Entities in which the Halfway Group holds a minority interest; and
- Entities which are dormant.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION ABOUT THE HALFWAY GROUP

The Chief Executive Officer for Halfway Group Holdings (Pty) Ltd is Mr. J G Baikie.

| HEAD OFFICE | - | |
|----------------|------------------|---|
| Postal Address | Physical Address | Contact Details |
| PO Box 1585 | 31 Stevens Road | Tel no: (039) 978 7500 |
| Scottburgh | Park Rynie | Fax no: (086) 694 2311 |
| 4180 | 4182 | Email: As set out in the Privacy Policy |
| | | Website: www.halfwaygroup.co.za |
| | | |

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guideon how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages and in braille.

The aforesaid Guide contains the description of-

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of-
- the Information Officer of every public body, and
- every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for-
- \cdot access to a record of a public body contemplated in section 11; and
- · access to a record of a private body contemplated in section 50;
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
- an internal appeal;
- $\boldsymbol{\cdot}$ a complaint to the Regulator; and
- an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

- the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.
- Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal business hours.
- · The Guide can also be obtained-
- · upon request to the Information Officer of any of the entities within the Halfway Group;
- from the website of the Regulator (https://www.justice.gov.za/inforeg/).
- A copy of this Guide is also available in the following two official languages namely English and IsiZulu, for public inspection during office hours.

6. AVAILABILITY OF RECORDS

Entities within the Halfway Group maintain the following categories of records and related subject matter. The status of the record's availability, the purpose for its processing and the relevant data subject category to who the record relates are set out below:

| Category: | Record: | Availability: | Purpose: | Data Subject: |
|----------------|----------------------------|------------------|------------------------------|---------------|
| Public Affairs | Public Product Information | Freely Available | Convey Public Information | Organisation |
| | Public Corporate Records | Freely Available | Convey Public Information | Organisation |
| | Media Releases | Freely Available | Convey Public Information | Organisation |
| | Published Newsletters | Freely Available | Convey Public Information | Organisation |
| | Magazine Articles | Freely Available | Convey Public Information | Organisation |

| Category: | Record: | Availability: | Purpose: | Data Subject: |
|--------------------------------|--|------------------|----------------------------|--|
| Regulatory & Administrative | FSP license | Freely Available | Statutory Requirement | Organisation |
| | Promotion of Access to Information Manual | Freely Available | Statutory Requirement | Organisation |
| | Website & Email Disclaimers | Freely Available | Statutory Requirement | Organisation |
| | Privacy Policy | Freely Available | Statutory Requirement | Organisation |
| | Conflict of Interest Management Policy | Freely Available | Statutory Requirement | Zanro Brokers (Pty) Ltd / Aston Financial Services (Pty) Ltd |
| | Complaint's resolution Policy | Freely Available | Statutory Requirement | Zanro Brokers (Pty) Ltd / Aston Financial Services (Pty) Ltd |
| | Suspicious and unusual transactions Policy | PAIA Request | Statutory Requirement | Zanro Brokers (Pty) Ltd / Aston Financial Services (Pty) Ltd |
| | Health & Safety Plan | PAIA Request | Statutory Requirement | Organisation |
| | Memorandum of Incorporation | PAIA Request | Statutory Requirement | Organisation |
| | Register of Board of Directors | PAIA Request | Statutory Requirement | Organisation |
| | Internal correspondence (e-mails/memos) | PAIA Request | Internal Communications | Employees |
| | Insurance Policies held by organization | PAIA Request | Risk Management | Organisation |

| Category: | Record: | Availability: | Purpose: | Data Subject: |
|--------------------|--------------------------------------|---------------|--------------------------|---------------|
| Human Resources | Employment Applications | PAIA Request | Internal Referencing | Employees |
| | Employment Contracts | PAIA Request | Contractual Agreement | Employees |
| | Personal Information of Employees | PAIA Request | Internal Referencing | Employees |
| | Employment Equity Plan | PAIA Request | Statutory Requirement | Organisation |
| | Medical Aid Records | PAIA Request | Internal Referencing | Employees |
| | Pension Fund Records | PAIA Request | Internal Referencing | Employees |
| | Disciplinary Records | PAIA Request | Statutory Requirement | Employees |
| | Performance Management Records | PAIA Request | Internal Referencing | Employees |
| | Salary Records | PAIA Request | Internal Referencing | Employees |
| | Employee Benefit Records | PAIA Request | Internal Referencing | Employees |
| | PAYE Records | PAIA Request | Statutory Requirement | Employees |
| | Seta Records | PAIA Request | Statutory Requirement | Employees |

| Category: | Record: | Availability: | Purpose: | Data Subject: |
|-----------|-------------------|---------------|--------------------------|---------------|
| | Disciplinary Code | PAIA Request | Statutory Requirement | Organisation |
| | Leave Records | PAIA Request | Internal Referencing | Employees |
| | Training Records | PAIA Request | Internal Referencing | Employees |
| | Training Manual | PAIA Request | Internal Referencing | Organisation |

| Financial | Financial Statements | PAIA Request | Statutory Requirement | Organisation |
|-----------|-------------------------------------|--------------|--------------------------|--------------|
| | Financial and Tax Records | PAIA Request | Statutory Requirement | Organisation |
| | Asset Register | PAIA Request | Internal Referencing | Organisation |
| | Management Accounts and Reports | PAIA Request | Internal Referencing | Organisation |
| | Vouchers, Cash Books and Ledgers | PAIA Request | Internal Referencing | Organisation |
| | Banking Records and Statements | PAIA Request | Internal Referencing | Organisation |
| | Electronic Banking Records | PAIA Request | Internal Referencing | Organisation |

| Category: | Record: | Availability: | Purpose: | Data Subject: |
|-----------|------------------------------------|---------------|-------------------------|---------------|
| Marketing | Market Information | PAIA Request | Internal Referencing | Organisation |
| | Product Brochures | PAIA Request | Internal Referencing | Organisation |
| | Advertisement policy | PAIA Request | Internal Referencing | Organisation |
| | Performance Records | PAIA Request | Internal Referencing | Organisation |
| | Product / Service Sales Records | PAIA Request | Internal Referencing | Organisation |
| | Marketing Strategies | PAIA Request | Internal Referencing | Organisation |

| Client / Customer | Customer / Client Database | PAIA Request | Internal Referencing | Customers |
|----------------------|-------------------------------------|--------------|----------------------------|-----------|
| | Customer / Client agreements | PAIA Request | Internal Referencing | Customers |
| | Customer / Client Files | PAIA Request | Internal Referencing | Customers |
| | Customer / Client Instructions | PAIA Request | Internal Communications | Customers |
| | Customer / Client Correspondence | PAIA Request | External Communications | Customers |

| Category: | Record: | Availability: | Purpose: | Data Subject: |
|-------------|--------------------------------|---------------|--------------------------|--|
| Third Party | Intermediary agreements | PAIA Request | Contractual Agreement | Zanro Brokers (Pty) Ltd / Aston Financial Services (Pty) Ltd |
| | Binder agreements | PAIA Request | Risk Management | Zanro Brokers (Pty) Ltd / Aston Financial Services (Pty) Ltd |
| | Referral agreements | PAIA Request | Contractual Agreement | Zanro Brokers (Pty) Ltd / Aston Financial Services (Pty) Ltd |
| | Outsource agreements | PAIA Request | Contractual Agreement | Third Party |
| | Non-disclosure agreements | PAIA Request | Contractual Agreement | Third Party |
| | Lease agreements | PAIA Request | Contractual Agreement | Third Party |
| | Service Provider agreements | PAIA Request | Contractual Agreement | Third Party |

7. STATUTORY RECORDS

- Administrative Adjudication of Road Traffic Offences
- Basic Conditions of Employment Act
- Broad Based Black Economic Empowerment Act
- Companies Act
- Competition Act
- $\cdot\,$ Compensation for Occupational Injuries and Diseases Act
- Constitution of the Republic of South Africa
- Copyright Act
- Disaster Management Act
- Electronic Communications Act
- Electronic Communications and Transactions Act
- Employment Equity Act
- Financial Advisory and Intermediary Services Act
- Financial Sector Regulation Act
- Health and Safety Regulations
- Income Tax Act
- Insurance Act
- Labour Relations Act
- National Minimum Wage Act
- National Payment System Act
- National Qualifications Framework Act
- $\cdot\,$ Occupational Health and Safety Act
- Policyholder Protections Rules 2017 Short Term Insurance
- Prescription Amendment Act
- Promotion of Equality and Prevention of Unfair Discrimination Act
- Promotion of Access to Information Amendment Act
- Protected Disclosures Act
- Protection of Personal Information Act
- Rental Housing Act
- Skills Development Act
- Skills Development Levies Act
- Short Term Insurance Act
- \cdot Tax Administration Act
- Unemployment Insurance Act
- Unemployment Insurance Contributions Act
- Value-Added Tax Act

8. DESCRIPTION OF THE CATEGORIES OF DATA SUBJECTS AND THE INFORMATION OR CATEGORIES OF INFORMATION RELATING THERETO

Below is a description of all data subjects and the description of the nature or category of personal information to be processed.

| Category of Data Subjects | Types of Information processed |
|---|---|
| Individuals (customer, policyholders etc.) | Name, surname, South African identity number or other identifying number (e.g., passport), date of birth, age, marital status, citizenship, telephone numbers, email address, physical and postal addresses, drivers' licence, income tax number, employment information, occupation, financial information (e.g., remuneration), banking information including account numbers, claims and payment history, FICA documentation. |
| Entities (Corporate Customers, Companies, Close Corporations, Trusts and Partnerships) | Entity name, registration number, tax-related information, contact details for representatives, FICA documentation, beneficial owners' personal information (as for Individuals). |
| Directors, Members, Partners & Trustees | Identity numbers, names, physical and postal address, contact numbers, email address & FICA documentation. |
| Employees (potential employees, new recruitments, independent contractors) | Name, surname, South African identity number or other identifying number (e.g., passport number), contact details, physical and postal address, date of birth, age, marital status, race, disability, information, employment history, criminal background checks, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information, drivers' licence, health information, details related to employee performance, disciplinary procedure information. May also include the personal information of children / minors, if they are listed as beneficiaries or dependants. |
| Service providers (including outsourced or hosted services, auditors, etc.) | Company registration details, identity numbers, BEE certificates, tax clearance, income tax and VAT registration details, payment information including bank account numbers, invoices, contractual agreements, addresses, contact details. |

9. THE CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED

Below is a description of recipients to whom your personal information may be shared:

- Service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.
- Entities within the Group. We only do this, in instances where we have received your express consent to do so.
- Insurers, intermediaries, administrators, and Underwriting Managers.
- Provident Funds and their Trustees and Principal Officers.
- Medical aid companies.
- Recruitment organisations that may collect information on our behalf.
- · Regulators and Law Enforcement Agencies.
- Motor Licencing Bureau.
- Original Equipment Manufacturers (OEMs).
- Banks and other financing Institutions.
- The South African Revenue Service (SARS).
- Auditors and External Compliance Practices

10. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

- Entities within the Halfway Group make use of hosted services provided by third parties. These operations may be hosted in various countries resulting in the transfer of personal information.
- In general, entities within the Halfway Group try as far as possible to ensure that these service providers are located in jurisdictions with strong data protection legislation, such as the European Union or the United Kingdom. Where this is not possible, data protection requirements are enforced by means of contractual agreement.

11. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY THE RESPONSIBLE PARTY TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF THE INFORMATION.

Entities within the Halfway Group take every reasonable precaution to protect your personal information (including information about your activities) from theft, unauthorized access, and disruption of services.

Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, and availability. We regularly test our website, data centers, systems, and other assets for security vulnerabilities.

Our security policies and procedures cover:

- · Physical and environmental security controls.
- Network security.
- Protection from viruses and other malware.
- Restricted access and password control to personal information.
- · Secure communications (email encryption).
- Secure remote working (VPN access only to the networks).
- Acceptable usage of IT equipment and mobile devices (Exit and entry procedures for staff).
- Clean Desk Policy.
- · Lockable cabinets for physical storage of records with restricted access.
- IT disaster recovery and backup procedures.
- Training and awareness initiatives.
- Retention and disposal of information (Shred it).
- · Cyber Security Incident Response.
- · Active monitoring and review of the IT and business environment.
- When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

12. REQUEST FOR INFORMATION PROCEDURE

To facilitate the processing of your information request, kindly complete the form marked Annexure A. The form must be submitted to the Information Officer or Deputy Information Officer whose details appear in the Halfway Group Privacy Policy.

The Information Officer or Deputy Information Officer will notify you that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure B for a full breakdown of fees payable.

Please be advised that PAIA provides a number of grounds on which a request for access to information may be refused. These grounds mainly comprise instances where:

- $\cdot\,$ the privacy and interests of other individuals are protected.
- where such records are already otherwise publicly available.
- · instances where public interest are not served.
- the mandatory protection of commercial information of a third party.
- the mandatory protection of certain confidential information of a third party.

When completing the form below please:

- indicate the identity of the person seeking access to the information.
- provide sufficient particulars to enable the Information or Deputy Information Officer to identify the information requested.
- specify the format in which the information is required.
- · indicate the contact details of the person requiring the information.
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right.
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed.
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

13. AVAILABILITY OF THE MANUAL

A copy of the Manual is available:

- On the various operating entities websites as well as on <u>halfwaygroup.co.za;</u>
- at each entity's physical place of business for public inspection during normal business hours;
- \cdot to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.
- A fee for a copy of the Manual, as contemplated in Annexure B, shall be payable per each A4-size photocopy made.

14. POLICY REVIEW

This policy will be reviewed on an ad hoc basis if there are any changes to the business operations or legislation that warrant such change. Alternatively, the policy will be reviewed once annually.

| Name of policy | Version No | Reason for change | Author | Approver | Approver | Effective Date |
|-------------------|------------|------------------------|--------------------|------------------|----------|-------------------|
| PAIA MANUAL | CoSEC01V1 | Amendment to Policy | Craig Humphreys | George Baikie | | 1 January 2022 |

ANNEXURE A: REQUEST FOR INFORMATION PROCEDURE

A. Particulars of Private Body

The Head:

B. Particulars of person requesting access to the record

(i) The particulars of the person who requests access to the record must be recorded below(ii) Furnish an address and/or fax number in the Republic to which information must be sent(iii) Proof of the capacity in which the request is made, if applicable, must be attached

Full names & surname:

| Identity number: | |
|-------------------|--|
| Postal address: | |
| | |
| | |
| | |
| Fax number: | |
| Telephone number: | |
| Email address: | |
| Capacity: | |

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person

Full names & surname:

Identity number:

D. Particulars of Record

(i) Provide full particulars of the record to which access is requested, including the reference number if that is known to you

(ii) If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages

Description of record:

Reference number:

Any further particulars:

E. Fees

(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 has been paid

(ii) You will be notified of the amount required to be paid as the request fee

(iii) 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 and prepare a record

(iv) If you qualify for exemption of the payment of any fee, please state the reason therefore

Reason for exemption:

F. Form of access to record

Financial Statements

If you are prevented by a disability to read, view or listen to the record in the form of access provided hereunder, please state your disability and indicate in which form the record is required

Disability:

Form in which required:

Mark the appropriate area with an "X"

(i) Your indication as to the required form of access depends on the form in which the record is available(ii) Access in the form requested may be refused in certain circumstances, In such a case you will be informed of access will be granted in another form

(iii) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested

1) If the record is in written or printed form:

| Copy of record | |
|----------------|--|
|----------------|--|

Inspection of record

2) If record consists of visual images:

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

Transcription of the soundtrack

4) If the record is held on computer or in an electronic or machine-readable form:

Printed copy of record

Copy in computer readable form

By hand

Post

Email

Fax

G. 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 additional folios.

Indicate which right is to be exercised or protected:

Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. NOTICE OF DECISION REGARDING THE 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.

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

I. SIGNATURE PAGE

Signed at:

Date:

Signature of Requester / Person on whose behalf request is made:

ANNEXURE B: PRESCRIBED FEES

| No. | Description | Fee |
|-----|--|--|
| 1. | The request fee payable by every requester | R140.00 |
| 2. | Photocopy/printed black & white copy of A4-size page | R2.00 |
| 3. | Printed copy of an A4 size page | R2.00 |
| 4. | For a copy in a computer-readable form on: | |
| | i. Flash drive (to be provided by requester) | R40.00 |
| | ii. Compact disc:If provided by requestorIf provided to the requestor | R40.00 R60.00 |
| 5. | For a transcription of visual images per A4-size page | |
| | | Service to be outsourced. Will depend on quotation |
| 6. | Copy of visual images | from Service provider. |
| 7. | Transcription of an audio record, per A4-size page | R24.00 |
| 8. | Copy of an audio record on: | |
| | i. Flash drive (to be provided by requester) | R40.00 |
| | ii. Compact disc:If provided by requestorIf provided to the requestor | R40.00 R60.00 |
| 9. | To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. | R145.00 |
| | To not exceed a total cost of | R435.00 |

| 10. | Deposit: If search exceeds 6 hours | One third of amount per request ito items 2-8. |
|-----|--|--|
| 11. | Postage, e-mail or any other electronic transfer | Actual expense, if any. |

ANNEXURE C: OPERATING ENTITIES INCORPORATED INTO THIS MANUAL

Please refer to the Halfway Group Privacy Policy for the names and contact details of the Information and Deputy Information Officers.

| Legal entity name: | Trading as: | Registration no: |
|---|--|------------------|
| 30-34 Rockview (Pty) Ltd | | 2015/378191/07 |
| 4 Wheel Drive Motor Distributors (Pty) Ltd | Halfway Toyota Honeydew / Hino Honeydew | 1984/010172/07 |
| 4 Wheel Drive Property Holdings (Pty) Ltd | | 2015/371475/07 |
| Alfred County Auto (Pty) Ltd | Halfway Ford Port Shepstone / Halfway Ford Waterfall / Halfway Ford Goodwood / Halfway Ford Kuils River | 2015/363372/07 |
| Aston Development (Pty) Ltd | | 2017/420483/07 |
| Aston Financial Services (Pty) Ltd | | 2013/233809/07 |
| Big Bus Transport (Pty) Ltd | | 2018/319793/07 |
| Bodyshack (Pty) Ltd | | 2013/043964/07 |
| Gillock Motors (Pty) Ltd | Halfway Toyota Malanda / BP Malanda | 2013/043724/07 |

| Gold Reef Motors (Pty) Ltd | Halfway Toyota Howick / Engen Howick | 2012/106066/07 |
|---|--|----------------|
| Gotya Protection Services (Pty) Ltd | Gotya Protection Services | 2018/530053/07 |
| Group Red Sky (Pty) Ltd | Hey Halfway (online vehicle sales) | 2014/000574/07 |
| Halfway Auto Holdings (Pty) Ltd | | 2015/270886/07 |
| Halfway Fleet Services KZN (Pty) Ltd | | 2017/061833/07 |
| Halfway Group Holdings (Pty) Ltd | | 2015/274007/07 |
| Halfway Motor Holdings (Pty) Ltd | | 2015/270810/07 |
| Halfway Service Station (Pty) Ltd | Halfway Toyota Park Rynie / Caltex Park Rynie | 2013/043993/07 |
| Halfway Truck Centre (Pty) Ltd | Hino Shelley Beach | 2013/044027/07 |
| Halfway Vehicle Hire (Pty) Ltd | | 2015/380432/07 |
| Hambanathi Vehicle Rental (Pty) Ltd | | 2013/071632/07 |
| JGB Properties (Pty) Ltd | | 2013/043940/07 |
| JMPH Finance Corporation (Pty) Ltd | | 1960/004165/07 |
| Locross (George) (Pty) Ltd | Halfway Toyota George | 1991/006380/07 |
| Murray and Daddy (Pty) Ltd | Halfway Hyundai Port Shepstone | 2017/012272/07 |

| New Age Logistics (Pty) Ltd | Mark White Nissan Amanzimtoti | 2015/383688/07 |
|---|-------------------------------|----------------|
| Oluhle Cleaning Services (Pty) Ltd | The Fairies | 2015/381459/07 |
| Parkhill Panelbeaters CC | | 1995/048872/23 |
| Randtip 91 (Pty) Ltd | | 2018/641047/07 |
| Red Wall Motors Port Shepstone (Pty) Ltd | Halfway Mazda Port Shepstone | 2015/380470/07 |
| Renu Finance (Pty) Ltd | | 2012/171422/07 |
| Renu Holdings (Pty) Ltd | | 2008/028623/07 |
| Rockview Property Holdings (Pty) Ltd | | 2015/270661/07 |
| RV Centre CC | Honeydew Panel Shop | 1995/051294/23 |
| Sanarth (Pty) Ltd | | 1956/001403/07 |
| Scottburgh Motors (Pty) Ltd | | 2015/377671/07 |
| Scottfin Financial Services (Pty) Ltd | | 2013/189233/07 |
| Scottfin Holdings (Pty) Ltd | | 2015/270954/07 |
| Stony River Properties 74 CC | | 2005/067618/23 |
| Thutha Motors (Pty) Ltd | Halfway Toyota Ottery | 2013/048620/07 |

| Uvongo Motors (Pty) Ltd | | 1949/033202/07 |
|-----------------------------|---|----------------|
| Village Mall Auto (Pty) Ltd | Halfway Toyota Fourways / Lexus Fourways | 2013/043983/07 |
| Zanro Brokers (Pty) Ltd | | 2020/831682/07 |