

PAIA Manual

ACCESS TO INFORMATION MANUAL

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

1. INTRODUCTION

- 1.1. Rivers Labour Consultants (“RLC”) Promotion of Access to Information Manual (“Manual”) is published in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”) and section 23 -25 of the Protection of Personal Information Act No.4 of 2014 (“POPIA”).
- 1.2. PAIA gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information. This is information held by the State but also information held by any another person. A person that is entitled to exercise a right or who needs information for the protection of any right, is entitled to access that information, subject to certain restraints.
- 1.3. Section 51 of PAIA creates a legal right to access records (as defined in section 1 of PAIA) of a private body (both natural and juristic), however this right may be negated in circumstances as set out under Chapter 4 of Part 3 of PAIA. In addition, in compliance with POPIA a responsible party who processes personal information must notify the person to whom personal information relates (“Data Subject”) of the manner in which the Data Subject can access their personal information held by the responsible.

2. MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT (ACT 2 OF 2000)

2.1 DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10

A Guide has been compiled in terms of Section 10 of PAIA by Rivers Labour Consultants (RLC). It contains information required by a person wishing to exercise any right, contemplated by PAIA. The Guide is available for inspection, *inter alia*, at the office of Rivers Labour Consultants (Pty) Ltd at:

Physical address: 3 Mansfield Road, Greendale Park, Howick, 3290

Postal address: 3 Mansfield Road, Greendale Park, Howick, 3290

www.riverslabourconsultants.co.za

For further information please contact RLC

E-mail: admin@riversconsultancy.co.za

Telephone: +27 81 898 9127

3. PURPOSE

- 3.1. The purpose of this manual is to facilitate requests for access to records (including records containing Personal Information (as defined in terms of the RLC Privacy Policy) of RLC.
- 3.2. Where this Manual does not deal with a procedure provided for in PAIA, the Requester or any other interested party is to look at the Act for guidance in relation thereto. Same is to be included as part of the Manual.
- 3.3. A person requesting access to records from RLC (“the Requester”) is advised to familiarise themselves with the provisions of PAIA before making any requests to RLC in terms of PAIA.
- 3.4. RLC makes no representation and gives no undertaking or warranty that any record(s) provided by it to a Requester is complete or accurate, or that such record is fit for any purpose. All users of such records shall use such records entirely at their own risk, and RLC shall not be liable for any loss, expense, liability, or claims, howsoever arising, resulting from the use of this Manual or of any record provided by RLC or any error therein.
- 3.5. All users and Requesters irrevocably agree to submit to the law of the Republic of South Africa and to the exclusive jurisdiction of the Courts of South Africa in respect of any dispute arising out of the use of this Manual or any records provided by RLC.
- 3.6. This manual will assist people wishing to access information in terms of PAIA from RLC.
- 3.7. This PAIA Manual is useful for the public to:
 - 3.6.1.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
 - 3.6.1.2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
 - 3.6.1.3. know the description of the records of the body which are available in accordance with any other legislation;
 - 3.6.1.4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
 - 3.6.1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
 - 3.6.1.6. know if the body will process 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;
 - 3.6.1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
 - 3.6.1.8. know the recipients or categories of recipients to whom the personal information may be supplied;
 - 3.6.1.9. know if the body 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

3.6.1.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. REQUEST FOR ACCESS TO INFORMATION

4.1 In the event that a person or entity requires access to information as contemplated in the Act, the requester must contact the Deputy Information Officer as per this document. In terms of section 25(2) states that:

- 4.1.1 If the request for access is granted, the notice in terms of subsection (4.1.1.2) must state—
- (a) **the access** fee (if any) to be paid upon access.
 - (b) the form in which access will be given; and
 - (c) that the requester may lodge an internal appeal or an application with a court, as the case may be, against the access fee to be paid or the form of access 15 granted, and the procedure (including the period) for lodging the internal appeal or application, as the case may be.
 - (d) If the request for access is refused, the notice in terms of subsection (4.1.1.2) must state:
 - a. adequate reasons for the refusal, including the provisions of this Act relied upon;
 - b. exclude, from such reasons, any reference to the content of the record; and
 - c. state that the requester may lodge an internal appeal or an application with a court, as the case may be, against the refusal of the request, and the procedure (including the period) for lodging the internal appeal or application, as the case may be.

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

5.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated, and made available the revised Guide on 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

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

5.3 The aforesaid Guide contains the description of-

5.3.1 the objects of PAIA and POPIA

5.3.2 the postal and street address, phone, and fax number and, if available, electronic mail address of -

5.3.2.1 the Information Officer of every public body, and

- 5.2.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 5.3.3 the manner and form of a request for-
 - 5.3.3.1 access to a record of a public body contemplated in section 11³; and
 - 5.3.3.2 access to a record of a private body contemplated in section 50⁴;
- 5.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 5.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
- 5.3.6 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-
 - 5.3.6.1 an internal appeal
 - 5.3.6.2 a complaint to the Regulator; and
 - 5.3.6.3 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;
- 5.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 5.3.8 the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.3.9 the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁵ Section 14(1) of PAIA- *The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

⁶ Section 51(1) of PAIA- *The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

⁷ Section 15(1) of PAIA- *The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

⁸ Section 52(1) of PAIA- *The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*

⁹ Section 22(1) of PAIA- *The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

¹⁰ Section 54(1) of PAIA- *The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

5.3.10 the regulations made in terms of section 92¹¹.

- 5.4 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 working hours.
- 5.5 The Guide can also be obtained-
 - 5.5.1 upon request to the Information Officer
 - 5.5.2 from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 5.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 5.6.1 English
 - 5.6.2 Isizulu

6 RIVERS LABOUR CONSULTANTS (PTY) LTD

- 6.1 Rivers Labour Consultants was established in 2012 by Gordon Belton as HR company focusing on assisting clients with Payroll and other HR functions.

Gerhard Botha joined the company as director in 2016 and together Gerhard Botha and Gordon Belton took this company to a professional service delivery company dealing with small, medium and big companies as ‘outsourced HR company’

RLC is the perfect solution for employers who don’t have an HR department or who need additional employment expertise to maintain legal compliance.

Our aim is to provide an easy, outsourced solution to maintaining high standards in employment practices, protecting your business and employees from the risks associated with common mistakes in HR administration.

We are a nationally active People Management Consultancy located in the picturesque KZN Midlands in Howick. Currently we have clients throughout KZN and different other regions. Operating across various industries: including Agriculture, Forestry, Security, Contractors & many other business sectors.

We offer individual attention and continued maintenance. With more than 35 years of Corporate, Commercial and Business experience, offer practical labour & HR advice in tune with your requirements.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

We also specialize in Payroll Solutions, offering advice & services to ensure cost effective and suitable methods of managing Salaries & Wages.

6.2 ORGANISATION DETAILS

Name: River Labour Consultants (Pty) Ltd

Physical address: 3 Mansfield Road, Greendale Park, Howick

Postal address: 3 Mansfield Road, Greendale Park, Howick, 3290

Contact details: 081 898 9127

Website address of your organization: www.riverslabourconsultants.co.za

6.3 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF RLC

6.3.1 Chief Information Officer

Name: Gordon Belton

Tel: 081 898 9127

Email: gordon@riversconsultancy.co.za

6.3.2 Deputy Information Officer

Name: Odea Botha

Tel: 082 441 6983

Email: odea@riversconsultancy.co.za

7 RECORDS OF RLC WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

7.1 Notice in terms of section 52(2) of the PAIA:

At this stage RLC does not have any categories of records which are automatically available without a person having to request access in terms of PAIA, and as such no notice has been published. All categories of records of the IoDSA require a formal request to access such records.

No notice has been submitted by the practice to the Minister of Justice and Constitutional Development regarding the categories of records, which are available without a person having to request access in terms of Section 52(2) of PAIA. However, the information on the website of the business is automatically available without having to request access in terms of PAIA.

8. RECORDS OF RLC WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

PAIA requires that sufficient detail be provided to facilitate a request for access to a record of RLC

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Policy	Protection of Personal Information Act, No 4 of 2013
Employment Contract	Basic Conditions of Employment Act 75 of 1997
Employment Job Descriptions	Basic Conditions of Employment Act 75 of 1997
Employment Policies	Basic Conditions of Employment Act 75 of 1997
Health and Safety Policy & Manual	Compensation for Occupational Injuries and Diseases Act 130 of 1993
	Competition Act 89 of 1998
	Consumer Protection Act 68 of 2008
	Copyright Act 61 of 1978
	Electronic Communications and Transactions Act 25 of 2002
	Employment Equity Act 55 of 1998
	Income Tax Act 58 of 1962
	Intellectual Property Laws Amendments Act 38 of 1997
	Labour Relations Act 66 of 1995
Health and Safety Policy & Manual	Occupational Health and Safety Act 85 of 1993
	Protection of Businesses Act 99 of 1978
Employment Contract	Skills Development Act 97 of 1998
	Skills Development Levies Act 9 of 1999
	Unemployment Insurance Act 63 of 2001
Employment Contract	Unemployment Insurance Contributions Act 4 of 2002
	Value Added Tax Act 89 of 1991
	Constitution of the Republic of South Africa Act, No 108 of 1996
	Promotion of Access to Information Act, No 2 of 2000
	Promotion of Equality & Prevention of Unfair Discrimination Amendment Act, No 52 of 2002
	Rental Housing Act, No 50 of 1999

Such records will be made available to only those individuals/entities authorised to request access to such records in terms of the particular legislation. Any other persons must follow the request for access of records procedure as outlined in this Manual.

9 SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

The subjects on which the private body holds records and the categories on each subject in terms of Section 51(1)(e) are as listed below. Please note that a requester is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the Act:

Subjects on which the body holds records	Categories of records
Administration Records	- Annual Reports - Strategic Plan - Annual Performance Plan. - Client Database - Company directorships - Company registrations - Membership to Industry Bodies - Minutes of Board of Directors Meetings - Records relating to the appointment of directors/ auditors/ secretary/ public office and other officers - Rental Agreements
Accounting Records	- Annual Reports - Budgets - Creditors Control - Debtors Control - Insurance Documentation - Management Accounts - Bank Statements - Invoices - Documents issued to employees for income tax purposes - PAYE Records

Subjects on which the body holds records	Categories of records
	- Records of payments made to SARS on behalf of employees - Value Added Tax Clearance Certificate - All other statutory compliances: - Value Added Tax - Skills Development Levies - Unemployment Insurance Fund
Sales and Marketing Records	- Prospective Client Database
Employee Records	- Contracts of Employment - Employee Details - Payroll - Job Descriptions - Disciplinary Records - Training and Skills Development - Performance Management
Human Resources	- HR policies and procedures - Advertised posts - Employee records - Minutes of Meetings - Leave Records - Records containing all employees' names and occupation - Salary Records - Sector Education and Training Authority Records - Training Manuals - Training Records
Client Records	- Contracts - Policies - Payroll - Strategic plans - Job Descriptions - Disciplinary Records - Training and Skills Development - Performance Management - Receipts - Correspondence - Service Agreements
Information Technology	- Information systems

Subjects on which the body holds records	Categories of records
	- Network security - Software licences - Technology assets
Supplier Records	- The name of the supplier - The address of the supplier - A description of the goods - The quantity or volume of the goods - Proof of date of payment
Insurance Records	- General Insurance - Professional Indemnity Insurance - Directors and Officers Insurance

9. DETAILS ON HOW TO MAKE A REQUEST FOR ACCESS

- 9.1 The requester must complete Form C and submit this form together with a request fee, to the person delegated to deal with requests (for “the designated head”). The form must be submitted using any of the methods noted below to:

Name: River Labour Consultants (Pty) Ltd

Physical address: 3 Mansfield Road, Greendale Park, Howick

Postal address: 3 Mansfield Road, Greendale Park, Howick, 3290

Contact details: 081 898 9127

Website address of your organization: www.riverslabourconsultants.co.za

9.2 Form of request:

- 9.2.1 The requester must use the prescribed form, as attached, to make the request for access to a record. This must be made to the designated head. This request must be made to the address, or electronic mail address of RLC [s 53(1)].
- 9.2.2 In terms of section 23(1) of POPIA, adequate proof of identity is required from the Requestor/Data Subject. Therefore, in addition to the prescribed access form, the Requestor will be required to supply a certified copy of their identification document or any other legally acceptable form of identification.
- 9.2.3 The request form and proof of identity must be provided to the Information Officer of RLC at the physical address or e-mail set out above. RLC may, in its sole discretion request that original certified copies be provided in certain circumstances such as if the electronic copies provided are not clear or are questionable.
- 9.2.4 The requester must provide sufficient detail on the request form to enable the designated head to identify the record and the requester.

- 9.2.5 The requester should indicate which form of access is required.
- 9.2.6 The requester should indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)].
- 9.2.7 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [s 53(2)(d)].
- 9.2.8 If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the designated head of the private body [s 53(2)(f)].
- 9.2.9 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.
- 9.2.10 Every other requester, who is not a personal requester, must pay the required request fee.
- 9.2.11 The designated head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [s 54(1)].
- 9.2.12 The fee that the requester must pay to a private body is currently R50,00. The requester may lodge an application to the court against the tender or payment of the request fees 54(3)(b)].
- 9.2.13 After the designated head of the private body has made a decision on the request, the requester must be notified in the required form.
- 9.2.14 If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 54(6)].
- 9.2.15 RLC may refuse access to the requested record of parts thereof as allowed in terms of Chapter 4, namely section 62 till 70 (inclusive) of PAIA.
- 9.2.16 In instances whereby a third party needs to be notified of request in order to authorise or decline access – RLC undertakes to request same from the third party within 21 (twenty-one) days of receipt of the request and to include the required information provided for in terms of section 71(3) of PAIA.
- 9.2.17 In the event that the request is declined by the third party – RLC cannot be held responsible for same.

9.3 Notification of refusal or granting of access to information

- 9.3.1 Requestors will be informed within 30 (thirty) days of receipt of the prescribed access form if RLC's decision is to refuse access to the information requested based on any of the grounds for refusal as contemplated in Chapter 4 of Part 3 of the PAIA. Take note that the 30 (thirty) day period may be extended for a further 30 (thirty) day period should more time be required to gather the requested information. The Requester

will, however, be notified if the initial 30 (thirty) day notice period is to be extended for a further 30 (thirty) days.

9.4 Refusal where the record cannot be found

- 9.4.1 If all reasonable steps have been taken by RLC to find the record requested by the Requester and same cannot be found for reasons justifiable as per section 55 of PAIA, the Information Officer shall provide an affidavit or affirmation to the Requester advising that it is not possible to give access to the record requested.
- 9.4.2 The affidavit or affirmation will comply with all the requirements provided for in terms of section 55(2) of the Act.
- 9.4.3 In the event the record is found subsequently, RLC undertakes to contact the Requester in order to gain access to same, subsequent to the payment of the applicable access fee.

10 AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available:

- 10.1.1 On the website: www.riverslabourconsultants.co.za;
- 10.1.2 head office of RLC for public inspection during normal business hours
- 10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 10.1.4 to the Information Regulator upon request.
- 10.1.5 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

11 FEES

11.1 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fees. Any other requester who is not a personal requester must pay the required fee:

- 11.1.1 A fee will be required by the head before further processing of the request in terms of S54 of the Act
- 11.1.2 A requester fee of R 50.00 should be paid, this amount will be refunded should the request for access be refused
- 11.1.3 A portion of the access fee (not more than one third) may be required before the request is considered
- 11.1.4 The requester may lodge an application with a court against the payment of the request fee in terms of S54(3)(b) of the Act
- 11.1.5 The head may withhold a record until the requester has paid the applicable fees

11.2 There are two basic types of fees applicable in terms of PAIA – “request” and “access” fees.

Request Fee:

The request fee is an administration fee that is payable on submission of the request for access to a record and must be paid before the request is considered (unless the request is to access the requestor's personal information in which event there is no applicable fee). The request fee is not refundable if the request for access has been granted however it is refundable if the request for access has been denied by RLC

- The request fee is currently statutorily set at R50-00 (fifty rand) for a private body.
- In line with section 23(1)(a) of POPIA, a Data Subject (i.e., personal requestor) has a right to request RLC to confirm, free of charge, whether or not RLC holds personal information about the Data Subject.

Access Fee

- The access fee is payable prior to the Requester actually gaining of access to the records in the required form.
- The access fee is intended to reimburse RLC for the costs involved in reproduction of documents, searching, and preparing the record requested and for any time reasonable required (in excess of the prescribed hours) to search and prepare the record.
- Should the preparation of the required record take more than 6 (six) hours, a deposit (which is 1/3 (one third)) of the access fee is payable before the request will be processed by RLC as a deposit.
- RLC may withhold a record until the Requester has paid the applicable fees (if any).
- In accordance with Section 23(3) of the POPIA, RLC may charge an access fee to the Data Subject to enable RLC to respond to the request. In such instances RLC must provide the Data Subject with a written estimate of the fee before providing the service.

PROCESSING OF PERSONAL INFORMATION

12. Purpose of Processing Personal Information

12.1 We collect, process and disclose your personal data only for specific and limited purposes. We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

- For example, to process your payments, to assess and handle any complaints, to develop and improve our products, services, communication methods and the functionality of our websites, to provide personalized products, communications and targeted advertising as well as product recommendations to you.

12.2 Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- goods or services purposes – *such as collecting orders or requests for and providing our goods or services; To process your payments, if you purchase our products, to provide you with your order status, deal with your enquiries and requests*
- marketing purposes – *such as pursuing lawful related marketing activities; To develop and improve our products, services, communication methods and the functionality of our websites;*
- business purposes – *such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; For internal training and quality assurance purposes; and*
- legal purposes – *such as handling claims, complying with regulations, or pursuing good governance.*

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website or do business with us;
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.
- Contact you with information on our business such as introducing new services, informing you of changes in our business or industry, keeping you abreast of new developments relating to our business

12.3 When we collect and use your personal data for purposes mentioned above or for other purposes, we will inform you before or at the time of collection.

12.4 Where appropriate, we will ask for your consent to process the personal data. Where you have given consent for processing activities, you have the right to withdraw your consent at any time.

12.5 Other than listed we will also use data for the following purposes:

- To support engagement with service providers
- To support engagement with the general public
- To support engagement with industry bodies
- To support recruitment and management of staff
- To support relationships with statutory and other authorities
- To support sales and marketing activities

13. CONSENT TO COLLECTION

13.1 We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

14. USE

14.1 Our obligations

We may use your personal information to fulfil our obligations to you.

14.2 Messages and Updates

We may send administrative messages and email updates to you about our products or services. We may wish to provide you with information about new goods or services in which we think you may be interested. This means that in some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

14.3 Targeted Content

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your personal information.

15. CATEGORIES OF DATA SUBJECTS AND OF THE RELATING THERETO

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	- Name, - Address, - Registration numbers or Identity Numbers, Employment status, - Bank details, - Payroll information - VAT Numbers
Service Providers	- Names, - Registration Number, - VAT Numbers, - Address, - Bank details

Categories of Data Subjects	Personal Information that may be processed
Employees	- Address, - Qualifications, - Gender and Race - ID Number - Bank Details - Payroll Information - SARS PAYE Number

15.2 Other than listed we will also process data for the following purposes:

- Employees: record of employee life cycle
- General public: tracking general enquiries and web site visits
- Industry bodies: membership records
- Media: records of media interactions
- Service providers: record of service provider life cycle
- Statutory and other authorities: contact details

16. CATEGORIES OF RECIPIENTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
ID Number Address	South African Police Services
ID Number Gender Race Payroll Information	Department of Labour
Qualifications ID Number Gender Race Payroll Information	South African Qualifications Authority & SETA

16.2 Other planned recipients of information could be:

- Employee pension fund
- Financial institutions
- Funders and donors

- Industry bodies
- International exchange partners
- Law enforcement
- Medical schemes
- Operators (service providers)
- Statutory authorities

17 PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION.

- 17.1 We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country.
- 17.2 Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country South Africa.
- 17.3 You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.
- 17.4 Personal information might flow:
- to operators (service providers)
 - through the use of social media
 - to international exchange partners

18. SECURITY

- 18.1 The Company takes the security of your personal data very seriously. We take every effort to protect your personal data from misuse, interference, loss, unauthorised access, modification or disclosure.
- 18.2 Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. Our measures include implementing appropriate access controls, investing in Information Security Capabilities to protect the IT environments we leverage, and ensuring we encrypt, personal data wherever possible.
- 18.3 Other Cyber security measures:
- Anti-spam measures
 - Anti-virus measures
 - Firewalls
 - Password controls

18.3 Access to your personal data is only permitted among our employees and agents on a need-to-know basis and subject to strict contractual confidentiality obligations when processed by third parties.

18.4 Training in information security is done with key staff

18.5 We implement disaster recover procedures where appropriate.

19. GENERAL

19.1 No addition to, variation, novation or waiver of this Policy Document shall be of any force or effect unless reduced to writing and signed.

19.2 This Policy Document is to be interpreted and implemented in accordance with the laws of South Africa.

Signature of Information Officer

Date of signature _____