



# **PAIA MANUAL**

# Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

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## 1. DEFINITIONS

Acronym	Definition
ASBIS Africa	ASBIS Africa (PTY) Limited
CEO	Chief Executive Officer
DIO	Deputy Information Officer
EMEA	Europe, the Middle East and Africa
GDPR	General Data Protection Regulation adopted by the European Parliament and the European Council on April 27th, 2016
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
Republic	Republic of South Africa

#### 2. PURPOSE OF THIS PAIA MANUAL

This PAIA Manual serves as a guide for the public and our clients on how to access information held by ASBIS Africa in accordance with PAIA. It outlines the procedures, fees, and grounds for refusal related to information requests. Additionally, it provides information on how we manage and protect personal information in compliance with POPIA.

This Promotion of Access to Information Manual ("PAIA Manual") provides an outline of the type of records and personal information that ASBIS Africa holds and explains how to submit requests to ASBIS Africa for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 ("PAIA Act"). It also explains how to object to, or to correct personal information held by ASBIS Africa, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 ("POPI Act").

Section 51(1) of the Act provides that within six months after the commencement of this section, the head of a private body must compile a manual that must contains information regarding the subjects and categories of records held by such private bodies. In this context, a "private body" is defined as any natural person who carries or has carried on any trade, business or profession, but only in such capacity or any partnership, which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g., any company, close corporation or business trust). ASBIS Africa falls within the definition of a "private body" and this Manual has been compiled in accordance with the said provisions and to fulfil the requirements of the Act.

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. In this context, Section 9 of the Act recognises that access to information can be limited. The limitation relates to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance. Accordingly, this manual provides a reference to the records held by ASBIS Africa and the process that needs to be adopted to access such records.

If you are accessing this Manual on our website, you can also get a copy from our Information Officer by writing to the address in section 4 or emailing the Information Officer directly.



All requests for access to information (other than information that is available to the public) must be addressed to the Head of the Business named in section 4 of this Manual.

# 3. ABOUT ASBIS AFRICA (PTY) LTD.

ASBIS Africa (PTY) Ltd. is part of the ASBIS Group, one of the leading distributors of Information & Communications Technology in EMEA markets and a creator of custom business solutions and consumer electronics for the public.

We are committed to transparency, accountability, and the responsible management of information. As part of our commitment to good governance, we comply with the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA).

## 4. Key Contact details for access to information of ASBIS Africa (PTY)

#### LIMITED.

#### **Information Officer:**

Name: Tsepo Mathebula Tel: +27606541386

Email: t.mathebula@asbis.africa

### Access to information general contacts

**Email**: <u>t.mathebula@asbis.africa</u>

#### **National or Head Office:**

Postal Address: Unit 7 Gosforth Business Park,

Corner of Van Riebeeck Road & Silverstone St,

Gosforth Park, Germiston,1401

Physical Address: Unit 7 Gosforth Business Park,

Corner of Van Riebeeck Road & Silverstone St,

Gosforth Park, Germiston, 1401

**Telephone**: +27 010 824 6960

**Email**: t.mathebula@asbis.africa

Website: www.asbis.co.za

#### 5. PAIA RESOURCES AND ACCESS TO THIS GUIDE

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.

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



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. A copy of the Guide is also available in two official languages, for public inspection during normal office hours.

The Guide can also be obtained:

- upon request to the Information Officer,
- from the website of the Regulator.

#### The Information Regulator (South Africa)

**Postal Address:** PO Box 31533, Braamfontein, 2017

Street Address: Woodmead North Office Park,

54 Maxwell Drive,

Woodmead,

Johannesburg, 2191

Website: https://inforegulator.org.za/

POPIA complaints: POPIAComplaints@inforegulator.org.za

PAIA complaints: PAIAComplaints@inforegulator.org.za

# 6. 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.
- 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 5 and 516 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 9211.

# 7. THE PROMOTION OF ACCESS TO INFORMATION ACT (PAIA)

PAIA is South Africa's legislation that promotes transparency and access to information held by public and private bodies. Its primary objectives are to foster a culture of openness, accountability and democracy by granting individuals and entities the right to access information.

PAIA grants individuals and entities the right to request access to records held by private and public bodies. These records can include documents, reports, data, and other forms of information. ASBIS Africa is committed to complying with PAIA and providing access to information in a responsible and transparent manner.



# 8. ASBIS AFRICA RECORDS AVAILABLE IN TERMS OF PAIA

Department	Data Subject Type	Processing Purpose	Personal Information Categor
Marketing	Customers /	Promotions, Launches,	Company Name
	Clients	Event Invitations	Email address
		Lawful basis:	Name, together with other
		S11 - We have the data subject's consent.	identifying information
		Retention Period:	Physical address
		Until consent withdrawn	Telephone number
Marketing	Major	Promotions, Launches,	Company Name
	Retailers	<b>Event Invitations</b>	Email address
		Lawful basis:	Name, together with other
		S11 - To conclude or perform a contract to	identifying information
		which the data subject is party.	Telephone number
		Retention Period:	
		Until contract completed	
Customer Service	Customers / Clients	Customer sales,	Email address
Service	Clients	service and support  Lawful basis:	Identification Number
		S11 - We have the data	Name, together with other identifying information
		subject's consent.	Physical address
		Retention Period:	Telephone number
		Until consent withdrawn	
Customer Service	Customers / Clients	Account Creation	Name, together with other identifying information
Sci vice	Circuits	Lawful basis:	Telephone number
		S11 - We have the data subject's consent.	Email address
		Retention Period:	Physical address
		Until consent withdrawn	Special Personal
		onen consent withdrawn	Information:
			Biometric information
			Lawful basis:
			S33 - We comply with provisions concerning a data subject's criminal behaviour or biometric information



Department	Data Subject Type	Processing Purpose	Personal Information Category
Information	Employees	Employee monitoring	Email address
Technology		Lawful basis:	Name, together with other
		S11 - To conclude or perform a contract to which the data subject is party.	identifying information Telephone number
		Retention Period:	
		Until contract completed	
Information Technology	Employees	Site management and security	Special Personal Information:
		Lawful basis:	Biometric information
		S11 - It protects a	Lawful basis:
		legitimate interest of the data subject.	S33 - We comply with
		Retention Period:	provisions concerning a data subject's criminal behaviour or
		Until no longer needed for purposes of data subject's access.	biometric information
Information	Employees	Account Creation	Name, together with other
Technology		Lawful basis:	identifying information
		S11 - To conclude or	Online identifier
		perform a contract to which the data subject is	Telephone number
		party.	Email address
		Retention Period:	Special Personal Information:
		Until no longer needed for	Biometric information
		purposes of data subject's access	Lawful basis
			S33 - We comply with provisions concerning a data subject's criminal behaviour or biometric information
Finance	Suppliers	<b>Payment Processing</b>	Certificate of Incorporation
		Lawful basis:	Certificate of Vat
		S11 - To conclude or	Company Name
		perform a contract to which the data subject is	Confidential Correspondence
		party.	Email address
		Retention Period:	Financial & banking details
		Until tax or other legal retention period expires	Location information



Department	Data Subject Type	Processing Purpose	Personal Information Category
			Name, together with other identifying information
			Physical address
			Signature
			Telephone number
Finance	Customers /	Payment Processing	Certificate of Incorporation
	Clients		Certificate of Vat
		Lawful basis:	Company Name
		S11 - To conclude or	Confidential Correspondence
		perform a contract to which the data subject is	Email address
		party.	Financial & banking details
			Location information
		Retention Period: Until contract completed	Name, together with other identifying information
		·	Physical address
			Signature
			Telephone number
Finance	Employees	Employment and	Personal Information Category
		performance management	Confidential Correspondence
		Lawful basis:	Education history
		S11 - To conclude or	Email address
		perform a contract to which the data subject is	Employment history
		party.	Financial & banking details
		Retention Period:	Identification Number
		Until tax or other legal	Job Title
		retention period expires	Location information
			Name, together with other identifying information
			Passport Number
			Physical address
			Signature
			Telephone number
			Special Personal Information:



Department	Data Subject Type	Processing Purpose	Personal Information Category
			Race or ethnic origin
			Lawful basis:
			S29 - We comply with provisions concerning a data subject's race or ethnic origin
Finance	Service	<b>Operational Services</b>	Certificate of Incorporation
	Providers	Lawful basis:	Certificate of Vat
		S11 - To conclude or	Company Name
		perform a contract to which the data subject is	Confidential Correspondence
		party.	Email address
		Retention Period:	Financial & banking details
		Until tax or other legal retention period expires	Location information
		retention period expires	Name, together with other identifying information
			Physical address
			Signature
			Telephone number
Sales - Rest of	Prospective	Sales	Company Name
Africa	Customers	Lawful basis:	Email address
		S11 - We have the data	Identification Number
		subject's consent.	Location information
		Retention Period: Until consent withdrawn	Name, together with other identifying information
			Physical address
			Telephone number
			Job Title
			Signature
			Passport Number
			Certificate of Incorporation
			Certificate of Vat
Sales -	Customers /	Sales	Company Name
Regional	Clients	Lawful basis:	Email address
		S11 - We have the data	Job Title
		subject's consent.  Retention Period:	Name, together with other identifying information



Department	Data Subject Type	Processing Purpose	Personal Information Category
		Until consent withdrawn	Physical address
			Signature
			Telephone number
Sales -	Prospective	Customer sales,	Company Name
Independent Channel	Customers	service and support	Email address
		Lawful basis:	Job Title
		S11 - We have the data subject's consent.	Name, together with other identifying information
		Retention Period:	Physical address
		Until consent withdrawn	Telephone number
Sales - Mass	Customers /	Customer sales,	Company Name
Retail	Clients	service and support	Email address
		Lawful basis:	Job Title
		S11 - We have the data subject's consent.	Physical address
		Retention Period:	Telephone number
		Until consent withdrawn	
Sales - Mass	Prospective	Sales - Mass Retail	Email address
Retail	Customers	Lawful basis: S11 - We have the data	Name, together with other identifying information
		subject's consent.	Physical address
		Retention Period:	Telephone number
		Until consent withdrawn	Company Name
Sales - Retail	Customers /	Sales	Company Name
	Clients	Lawful basis:	Email address
		S11 - We have the data	Job Title
		subject's consent.  Retention Period:	Name, together with other identifying information
		Until consent withdrawn	Physical address
			Telephone number
Sales - Retail	Prospective	Sales	Company Name
	Customers	Lawful basis:	Email address
		S11 - We have the data subject's consent.	Job Title



Department	Data Subject Type	Processing Purpose	Personal Information Category
		Retention Period: Until consent withdrawn	Name, together with other identifying information
		onen consent wiendrawn	Physical address
			Telephone number
Product Line	Customers /	Sales and Distribution	Certificate of Incorporation
Sales	Clients	Lawful basis:	Certificate of Vat
		S11 - We have the data	Company Name
		subject's consent.	Confidential Correspondence
		Retention Period:	Email address
		Until consent withdrawn	Financial & banking details
			Location information
			Name, together with other identifying information
			Physical address
			Signature
			Telephone number
Product Line	Prospective	Account Creation and	Certificate of Incorporation
Sales	Customers	Sales	Certificate of Vat
		Lawful basis:	Company Name
		S11 - We have the data subject's consent.	Confidential Correspondence
		Retention Period:	Email address
		Until consent withdrawn	Financial & banking details
			Location information
			Name, together with other identifying information
			Physical address
			Signature
			Telephone number
Logistics	Employees	<b>Account Creation</b>	Certificate of Vat
		Lawful basis:	Company Name
		S11 - We have the	Email address
		competent person's consent.	Financial & banking details
		Retention Period:	Identification Number
		Until contract completed	Job Title
		,	



Department	Data Subject Type	Processing Purpose	Personal Information Category
			Location information
			Name, together with other identifying information
			Physical address
			Signature
			Telephone number
Human	Employees	Employment and	Biometric Information
Resources		performance management	Confidential Correspondence
		Lawful basis:	Education history
		S11 - To conclude or perform a contract to	Email address Employment history
		which the data subject is	Financial & banking details
		party.  Retention Period:	Identification Number
			Job Title
		Until tax or other legal retention period expires.	Location information
			Name, together with other identifying
			information
			Physical address
			Signature
			Telephone number
			Special Personal Information Category:
			Disability
			Lawful basis:
			S32 - We comply with provisions concerning a data subject's health or sex life.
Human	Employee	Payment Processing	Confidential Correspondence
Resources		Lawful basis:	Email address
		S11 - To conclude or	Financial & banking details
	perform a contract to which the data subject is	Identification Number	
		party.	Job Title
	Retention Period: tax or other legal	Retention Period: Until	Location information
		retention period expires.	Name, together with other identifying



Department	Data Subject Type	Processing Purpose	Personal Information Category
			information
			Physical address
			Tax Reference Number
			Telephone number
			Special Personal
			Information Category:
			Disability
			Lawful Basis:
			S32 - We comply with provisions concerning a data subject's health or sex life.
			Lawful Basis:
			Race or ethnic origin
			S29 - We comply with provisions concerning a data subject's race or ethnic origin
Human	Employee	Provident Fund	Email address
Resources	. ,	Lawful basis:	Financial & banking details
		S11 - To conclude or	Identification Number
		perform a contract to	Job Title
		which the data subject is party.	Name, together with other
		Retention Period:	identifying
		Until tax or other legal	information
		retention period expires	Tax Reference Number
			Telephone number
Human	Employee	Medical Aid	Identification Number
Resources		Lawful basis: S11 - To conclude or	Name, together with other identifying
		perform a contract to which the data subject is party.	Information
			Special Personal
		Retention Period:	Information Category
		Until tax or other legal	Medical History
		retention period expires.	Lawful basis:



Human Resources    Employee   Psychometric Testing Lawful basis:   Confidential Correspondence Email address   Job Title   Name, together with other identifying information   Physical address   Signature   Tax Reference Number   Telephone number   Special Personal   Information Category: Disability   Lawful basis:   S32 - We comply with provisions concerning a data subject's health or sex life.   Race or ethnic origin   Lawful basis:	Department	Data Subject Type	Processing Purpose	Personal Information Category
Lawful basis:   Email address   Job Title   Name, together with other identifying   Information				provisions concerning a data
Lawful basis:  S11 - To conclude or perform a contract to which the data subject is party.  Retention Period: Until tax or other legal retention period expires  Employee  Statutory Reporting Lawful basis: Confidential Correspondence Email address Financial & banking details Identification Number Job Title Until tax or other legal retention period expires.  Retention Period: Until tax or other legal retention period expires.  Retention Period: Until tax or other legal retention period expires.  Retention Period: Until tax or other legal retention period expires.  Retention Period: Until tax or other legal retention period expires.  Retention Period: Until tax or other legal retention period expires.  Identification Number Location information Name, together with other identifying information Physical address Signature Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin		Employee	<b>Psychometric Testing</b>	Confidential Correspondence
perform a contract to which the data subject is party.  Retention Period: Until tax or other legal retention period expires  Employee Statutory Reporting Lawful basis: S11 - To conclude or perform a contract to which the data subject is party. Retention Period: Until tax or other legal retention period expires.  Retention Period: Until tax or other legal retention period expires.  Retention Period: Until tax or other legal retention period expires. Signature Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin	Kesources		Lawful basis:	Email address
which the data subject is party.  Retention Period: Until tax or other legal retention period expires  Employee  Statutory Reporting Lawful basis: S11 - To conclude or perform a contract to which the data subject is party. Retention Period: Until tax or other legal retention information  Retention Period: Until tax or other legal retention period expires.  Retention Period: Until tax or other legal retention period expires.  Signature Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin				Job Title
Human Resources  Employee Statutory Reporting Lawful basis:  S11 - To conclude or perform a contract to which the data subject is party.  Retention Period: Until tax or other legal retention period expires.  Retention period expires.  Retention period expires.  Financial & banking details Identification Number Job Title Location information Name, together with other identifying information Physical address Signature Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin			which the data subject is	
Human Resources  Employee Statutory Reporting Company Name  Lawful basis: Confidential Correspondence  S11 - To conclude or perform a contract to which the data subject is party.  Retention Period: Job Title  Until tax or other legal retention period expires.  Name, together with other identifying information  Physical address  Signature  Tax Reference Number  Telephone number  Special Personal  Information Category:  Disability  Lawful basis:  \$32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin			Retention Period:	information
Resources  Lawful basis:  S11 - To conclude or perform a contract to which the data subject is party.  Retention Period:  Until tax or other legal retention period expires.  Name, together with other identifying information  Physical address  Signature  Tax Reference Number  Telephone number  Special Personal  Information Category:  Disability  Lawful basis:  S32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin				
Lawful basis:  S11 - To conclude or perform a contract to which the data subject is party.  Retention Period: Until tax or other legal retention period expires.  Until tax or other legal retention period expires.  Which the data subject is party.  Retention Period: Until tax or other legal retention period expires.  Until tax or other legal retention period expires.  Information Physical address Signature  Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis:  S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin		Employee	Statutory Reporting	Company Name
perform a contract to which the data subject is party.  Retention Period:  Until tax or other legal retention period expires.  Until tax or other legal information  Name, together with other identifying information  Physical address  Signature  Tax Reference Number  Telephone number  Special Personal  Information Category:  Disability  Lawful basis:  \$32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin	Resources		Lawful basis:	Confidential Correspondence
which the data subject is party.  Retention Period: Until tax or other legal retention period expires.  Name, together with other identifying information Physical address Signature Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin				Email address
Retention Period:  Until tax or other legal retention period expires.  Name, together with other identifying information  Physical address  Signature  Tax Reference Number  Telephone number  Special Personal  Information Category:  Disability  Lawful basis:  S32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin				Financial & banking details
Until tax or other legal retention period expires.  Location information Name, together with other identifying information Physical address Signature Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin			party.	Identification Number
retention period expires.  Name, together with other identifying information Physical address Signature Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin			Retention Period:	Job Title
Name, together with other identifying information Physical address Signature Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin				Location information
Physical address  Signature  Tax Reference Number  Telephone number  Special Personal  Information Category:  Disability  Lawful basis:  S32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin			recention period expired.	
Signature  Tax Reference Number  Telephone number  Special Personal  Information Category:  Disability  Lawful basis:  S32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin				information
Tax Reference Number Telephone number Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin				Physical address
Telephone number  Special Personal  Information Category:  Disability  Lawful basis:  S32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin				Signature
Special Personal Information Category: Disability Lawful basis: S32 - We comply with provisions concerning a data subject's health or sex life. Race or ethnic origin				Tax Reference Number
Information Category:  Disability  Lawful basis:  S32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin				Telephone number
Disability  Lawful basis:  \$32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin				Special Personal
Lawful basis:  S32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin				Information Category:
S32 - We comply with provisions concerning a data subject's health or sex life.  Race or ethnic origin				Disability
provisions concerning a data subject's health or sex life.  Race or ethnic origin				Lawful basis:
				provisions concerning a data
Lawful basis:				Race or ethnic origin
				Lawful basis:



Department	Data Subject Type	Processing Purpose	Personal Information Category
			S29 - We comply with provisions concerning a data subject's race or ethnic origin.
Human	Prospective	<b>Psychometric Testing</b>	Email address
Resources	Employees	Lawful basis:	Identification Number
		S11 - We have the data subject's consent.	Name, together with other identifying Information.
		Retention Period:	
		Until consent withdrawn.	

# 9. DESCRIPTION OF THE RECORDS OF ASBIS AFRICA WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

APPLICABLE LEGISLATION	CATEGORY OF RECORDS
BASIC CONDITIONS OF EMPLOYMENT ACT, 1997:	Employment contracts and records
BROAD-BASED BLACK ECONOMIC EMPOWERMENT (B-BBEE) ACT, 2003:	Ownership and equity records B-BBEE records
COMPANIES ACT, 2008:	Memorandum of Incorporation Financial records Director and officer information
COMPANIES REGULATIONS, 2011:	Financial records Corporate governance records
CONSUMER PROTECTION ACT, 2008:	Consumer complaints Contracts & terms and conditions of sale
CUSTOMS AND EXCISE ACT, 1964:	Import and Export documentation Customs declarations
DATA PROTECTION AND PRIVACY LAWS: POPIA	Data protection policies and procedures
EMPLOYMENT EQUITY ACT, 1998:	Equity plans and reports Employee demographic profiles
EXPORT CONTROL REGULATIONS:	Export and import records, licenses and permits
FINANCIAL SECTOR REGULATION ACT, 2017:	Financial sector regulation compliance records
INCOME TAX ACT, 1962:	Financial records Employment records Tax returns and supporting documents Tax clearance certificates
LABOUR RELATIONS ACT, 1995:	Employment contracts and employee records
NATIONAL CREDIT ACT, 2005:	Consumer credit agreement and payment records



APPLICABLE LEGISLATION	CATEGORY OF RECORDS
OCCUPATIONAL HEALTH AND SAFETY ACT, 1993:	Health and safety policies Incident and accident reports
SKILLS DEVELOPMENT ACT, 1998:	Skills development plans and skills training records
VALUE-ADDED TAX (VAT) ACT, 1991:	Vat related Financial records
LOCAL GOVERNMENT REGULATIONS:	
ENVIRONMENTAL LAWS AND REGULATIONS:	
INTELLECTUAL PROPERTY LAWS:	

## 10. How to Request Access to Records (Private Body)

- 1. Complete Form 2 (Regulation 7) and submit it to the Information Officer / Deputy Information Officer using the contact details in section 3. If a requester is unable to complete the form due to illiteracy or disability, the IO must assist to complete Form 2 on the requester's behalf. (See Annexure A of this document)
- 2. Attach proof of identity and, if applicable, authority to act on behalf of another person or entity.
- 3. Pay the prescribed request fee of R140 (unless exempt in terms of section 54(1) of PAIA for a personal requester). You will be advised of any additional access fee for reproduction, search and preparation, postage or electronic transfer (see Annexure A: Fees).
- 4. Decision period: You will receive a written outcome (Form 3) as soon as reasonably possible, but within 30 days of receiving a complete request (and payment of the request fee, where applicable). The period may be extended once for up to a further 30 days in the circumstances allowed by PAIA (e.g. large volume, off-site search, consultations).
- 5. If access is granted, the record will be made available in the form requested where reasonable. Access will be given after payment of the applicable access fee.
- 6. If your request is refused or deemed refused, you may lodge a complaint with the Information Regulator using Form 5 (see section 4.3 for contact details).

#### **Grounds For Refusal**

- Mandatory protection of privacy of third parties (including personal information).
- Mandatory protection of confidential information of third parties or the private body (trade secrets, commercial information).
- Mandatory protection of safety of individuals and property; law-enforcement records; legal privilege.
- Protection of research information; records containing security measures.
- Severability applies disclosable parts of a record must be provided where possible.



#### 11. PROCESSING OF PERSONAL INFORMATION

ASBIS Africa do not currently process Personal Information.

## 12. SHARING OF PERSONAL INFORMATION

We disclose personal information to the following recipients:

Category of Recipient	Туре	Category	Country
Collection and Delivery Service	Responsible	Couriers	South
	Party		Africa
Security	Responsible	Security Service	South
	Party	Provider	Africa
Shipping	Responsible	Freight Forwarders	South
	Party		Africa
Benefit Service Provider	Responsible	Broker	South
	Party		Africa
Software Provider	Responsible	Software Vendor	South
	Party		Africa
SARS, Department of Labour and Sita	Responsible	Government	South
Registration Authority	Party		Africa

### 13. TRANSBORDER FLOW OF PERSONAL INFORMATION

Some personal information may be stored in the cloud outside of the Republic of South Africa and on the servers of the ASBIS Group.

Countries to which we transfer your data may not have the same data protection laws as your jurisdiction. We take reasonable cyber security measures and/or apply standard contractual clauses (e.g., Standard Clauses, Data Processing Agreement) to ensure that your data is adequately protected.

#### 14. SECURITY MEASURES

Through regular risk assessment, we can identify security measures necessary to secure the confidentiality and integrity of processing of personal information.

#### 15. AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

- on www.asbis.co.za.
- At ASBIS Africa head office for public inspection during normal business hours.
- to any person upon request and upon the payment of a reasonable prescribed fee.
- to the Information Regulator upon request.

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.

### 16. UPDATING OF THE MANUAL

The head of ASBIS Africa will on a regular basis update this manual.

<b>ASBIS</b>
SUCCESS THROUGH FOCUS

Issued b	٧
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Tsepo Mathebula

Financial Manager ASBIS Africa (PTY) Limited.



# 17. ANNEXURE A



## FORM 2

# REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE: 1. Proof of identity mu 2. If requests made of form.				ich authorisation	, must be attached to this
TO: The Information	Officer				
(Addres	ss)				
E-mail address:	1000				
Fax number:			100		
Mark with an "X"					
Request is mad	le in my own	name	Requ	uest is made on	behalf of another person.
		PERSONA	LINFORMAT	TION	
Full Names					
Identity Number					
Capacity in which request is made (when made on behalf of another person)					
Postal Address					
Street Address	3				
E-mail Address	0.				
Contact Numbers	Tel. (B):			Facsimile:	
	Cellular:				
Full names of person on whose behalf request is made (if applicable):					
Identity Number	3				
Postal Address	95				

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Street Address		
E-mail Address		
Contact Numbers	Tel. (B)	Facsimile
	Cellular	
that is known to you, to	of the record to whic enable the record to	OF RECORD REQUESTED  h access is requested, including the reference number if be located. (If the provided space is inadequate, please his form. All additional pages must be signed.)
Description of record or relevant part of the record:	-	
Reference number, if available		
Any further particulars of record		
		PE OF RECORD  pplicable box with an "X")
Record is in written or p	orinted form	
Record comprises virt computer-generated im		ludes photographs, slides, video recordings,
Record consists of reco	orded words or informa	tion which can be reproduced in sound
Record is held on a cor	nputer or in an electro	nic, or machine-readable form

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FORM OF ACCESS  (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and informa held on computer or in an electronic or machine-readable form)	tion
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive(including virtual images and soundtracks)	_
Copy of record saved on cloud storage server	_

MANNER OF ACCESS (Mark the applicable box with an "X")		
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)		
Postal services to postal address		
Postal services to street address		
Courier service to street address		
Facsimile of information in written or printed format (including transcriptions)		
E-mail of information (including soundtracks if possible)		
Cloud share/file transfer		
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)		

PARTIC	CULARS OF RIGHT TO BE EXERCISED OR PROTECTED
If the provided space is in	adequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.
Indicate which right is to be exercised or protected	

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equested is required for			
ne exercise or rotection of the			
forementioned right:			
	- III	FEES	
a) A request fee must b	a anid bafasa tha sa	arrand will be assessed	and.
b) You will be notified of The fee payable for a the reasonable time d) If you qualify for exer	f the amount of the a access to a record d required to search fo	eccess fee to be paid epends on the form or and prepare a rec	d. in which access is required and
Reason			
ou will be notified in writing			ved or denied and if approved
Postal address	Facsimile	Elect	tronic communication (Please specify)
			10-2 10-5 1-5 11-5 10-5 10-5 11-5 11-5 11-5
Signed at	this	day of	20
Signature of Requester / pe	erson on whose be	half r <mark>e</mark> quest is mad	_ le
	FOR C	OFFICIAL USE	
Reference number:			
Surname of Information Office	And er)		
Date received:			
Access fees:			
Deposit (if any):			
	- 1		

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