

## PAIA MANUAL

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### MANUAL

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## 1. INTRODUCTION

Southern Ropes (Pty) Ltd conducts business in rope manufacturing and related.

General information about Southern Ropes can be accessed via the internet on [www.southernropes.com](http://www.southernropes.com) which is available to all persons who have access to the internet.

This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and the personal information it holds and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“the Act”). In addition, it explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPI Act”).

The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in section 5.

### 1.1 Availability of this manual

This manual is published on the Company website at [www.southernropes.com](http://www.southernropes.com) alternatively, a copy can be requested from Southern Ropes (see contact details in section 2).

## 1.2 Availability of guides to the PAIA and POPI Acts

Guides to the PAIA and POPI Acts can be obtained and queries directed to:

PAIA Act  
South African Human Rights Commission  
Promotion of Access to Information Act  
Unit  
Research and Documentation  
Department

Private Bag 2700  
Houghton  
Johannesburg  
2041  
[mnyuswa@sahrc.org.za](mailto:mnyuswa@sahrc.org.za)  
[www.sahrc.org.za](http://www.sahrc.org.za)

POPIA Act  
Information Regulator

PO Box 31533  
Braamfontein  
Johannesburg  
2017  
[infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)  
<https://www.justice.gov.za/infoereg/>

## 2. COMPANY DETAILS

Company contact details in terms of PAIA section 51:

Southern Ropes (Pty) Ltd  
PO Box 65  
Woodstock  
7915

Physical Address  
4 Beach Road  
Woodstock  
7925

Telephone number: +27 (21) 448 4978 (switchboard)  
Website: [www.southernropes.com](http://www.southernropes.com)

Duly authorised persons:  
Name: Marcelle Bauermeister  
Email: [marcelle@sropes.co.za](mailto:marcelle@sropes.co.za)

## 3. RECORDS AUTOMATICALLY AVAILABLE

No notice has been submitted by Southern Ropes 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.

## 4. RECORD SUBJECTS AND CATEGORIES AVAILABLE IN TERMS OF THE ACT

### 4.1 Company records availability

The Schedule of Records as contained in Appendix 1 of this Manual details the Records that are held and/or processed by Southern Ropes for the purposes of PAIA and POPIA respectively. Such Access to such Records may not be granted if they are subject to the grounds of refusal specified in Sections 62 to 70 of the Act.

### 4.2 List of applicable legislation

Southern Ropes retains records which are required in terms of legislation other than PAIA. Legislation. Certain legislation provides that private bodies shall allow certain persons access to specified records, upon request. Legislation that may be consulted to establish whether the Requester has a right of access to a record other than in terms of the procedure set out in the PAIA is set out in Appendix 2.

## 5. PROCESSING OF PERSONAL INFORMATION

### 5.1 The purpose of processing of personal information by Southern Ropes

Southern Ropes processes personal information for a variety of purposes, including but not limited to the following:

- For recruitment purposes
- For employment and management purposes
- For apprenticeship purposes
- For travel purposes
- For general administration, financial and tax purposes
- For legal or contractual purposes
- For health and safety purposes
- To monitor access, secure and manage its premises and facilities
- To transact with its suppliers, customers and business partners
- To support engagement with the general public
- To support engagement with investors and the media

5.2 Categories of data subjects and personal information processed by Southern Ropes. Categories of data subjects and personal information processed by Southern Ropes include the following:

### Categories of data subjects

Customers and potential customers

Business partners

Suppliers

Employees

Job applicants

Visitors

### Personal information processed

Personal information of customer's employees

Customer contact information

Customer location information

Personal Information of business partner's employees

Business partners contact information.

Business partners information

Personal Information of suppliers' employees

Suppliers contact information.

Suppliers information

Employee personal information

Employee medical information

Employee disability information

Employee Pension and Provident Fund Information

Employee contracts

Employee performance records

Payroll records

Electronic access records

Physical access records

Surveillance records

Health and safety records

Training records

Employment history

Time and attendance records

Curriculum vitae and application forms

Criminal checks

Background checks

Physical access records

Electronic access records and scans

Surveillance records

5.3 Recipients or categories of recipients with whom personal information is shared

Southern Ropes may share the personal information of its data subjects for any of the purposes outlined in Section 4.1, with the following:

- Any associated company of Southern Ropes
- Any consultant or advisor to Southern Ropes
- Any relevant regulatory authorities
- Any service provider, contractor or supplier with whom Southern Ropes has an agreement and
- Any business partners who provide products and services to Southern Ropes

Southern Ropes does not share the personal information of its data subjects with any third parties, except if it is:

- Obligated to provide such information for legal or regulatory purposes
- Required to do so for purposes of existing or future legal proceedings
  - Selling one or more of its businesses to someone to whom it may transfer its rights under any customer agreement
- Involved in the prevention of fraud, loss, bribery, or corruption
- Performing services and process personal information on its behalf or
- Is required to provide or manage any information, products and / or services to data subjects

Southern Ropes will send its data subjects notifications or communications if it is obliged by law, or in terms of contractual relationship with them.

Southern Ropes will only disclose personal information to government authorities if it is required to do so by law.

Southern Ropes' employees are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

#### 5.4 Information security measures to protect personal information

Southern Ropes employs up to date technology to ensure the confidentiality, integrity, and availability of the Personal Information under its care. Measures include:

- Firewalls
- Virus protection software and update protocols
- Logical and physical access control
- Secure setup of hardware and software making up the IT infrastructure

#### 5.5 Trans-border flows of personal information

When making authorised disclosures or transfers of personal information in terms of section 72 of POPIA, Personal Data may be disclosed to recipients located in countries which do not offer a level of protection for those data as high as the level of protection as South Africa.

## 6. DETAILS ON HOW TO MAKE A REQUEST

To facilitate the processing of a request, a requestor must:

- Use the prescribed form to the Information Officer as contained in Appendix 3.
- Provide sufficient detail to enable Southern Ropes to identify:
  - The record(s) requested.
  - The requestor (and, if an agent is lodging the request, proof of capacity).
  - The South African postal address or email address of the requestor.
  - The form of access required.
  - The South African postal address or email address of the requestor.
- If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.

The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

Southern Ropes has the right to reject any request for information submitted in terms of Sections 62 to 70 of Chapter 4 of the PAIA Act.

## 6.1 Prescribed fees

The following applies to requests (other than personal requests):

- i. A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.
- ii. If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- iii. A requestor may lodge an application with a court against the tender / payment of the request fee and / or deposit.
- iv. Records may be withheld until the fees have been paid.
- v. The detailed Fee Structure is as contained in Appendix 4.

## 7. REMEDIES

The company does not have internal appeal procedures regarding PAIA and POPI Act requests. As such, the decision made by the duly authorised persons in section [2](#), is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator (once established), for relief.

## Appendix A - Company records

The following is a list of the records which Southern Ropes holds and the categories into which they fall. The procedure in terms of which such records may be requested from Southern Ropes is set out in Section 6 of this manual.

- 1.1 Administration
  - 1.1.1 Memorandum of incorporation
  - 1.1.2 Minutes of meeting of the board of directors
  - 1.1.3 Proxy forms
  - 1.1.4 Register of directors' shareholdings
  - 1.1.5 Share certificates and
  - 1.1.6 Share register and other statutory registers and / or records and / or documents
  - 1.1.7 Special resolutions / resolutions passed at general and class meetings
  - 1.1.8 Records relating to the appointment of Auditors, Directors, Prescribed Officer, Public Officer and Company Secretary
  - 1.1.9 Minutes of meetings of Executive Committee
  - 1.1.10 Internal correspondence and
  - 1.1.11 Resolutions of the Directors of Southern Ropes
  
- 1.2 Finance
  - 1.2.1 Accounting records
  - 1.2.2 Annual financial reports
  - 1.2.3 Interim and annual financial statements
  - 1.2.4 Asset registers
  - 1.2.5 Banking records
  - 1.2.6 Debtors / creditors statements and invoices
  - 1.2.7 Invoices issued in respect of debtors and billing information
  - 1.2.8 Policies and procedures
  - 1.2.9 Insurance records
  - 1.2.10 Tax records and
  - 1.2.11 Auditors reports
  
- 1.3 Human resources
  - 1.3.1 List of employees
  - 1.3.2 Statistics regarding employees
  - 1.3.3 Employment contracts
  - 1.3.4 Conditions of employment
  - 1.3.5 Information relating to prospective employees including curricula vitae and application forms
  - 1.3.6 Personnel records including personal details, disciplinary records, performance and internal evaluation records
  - 1.3.7 Employee tax information
  - 1.3.8 Records of unemployment
  - 1.3.9 Insurance fund contributions
  - 1.3.10 Records regarding Group life assurance and disability income protection
  - 1.3.11 Provident fund records
  - 1.3.12 Payroll records
  - 1.3.13 Health and safety records
  - 1.3.14 Employment equity plan
  - 1.3.15 Skills development plan



- 1.3.16 SETA records
- 1.3.17 Codes of conduct
- 1.3.18 Disciplinary code and procedure
- 1.3.19 Remuneration policy
- 1.3.20 Training schedules and material and
- 1.3.21 Correspondence relating to personnel
  
- 1.4 Customers and suppliers
  - 1.4.1 List of customers and details of customers
  - 1.4.2 Customer and supplier agreements
  - 1.4.3 Standard terms and conditions for supply of services and products and
  - 1.4.4 Standard operating procedures
  
- 1.5 Property
  - 1.5.1 Asset registers
  - 1.5.2 Lease agreements in respect of immovable property
  - 1.5.3 Records regarding insurance in respect of movable property and
  - 1.5.4 Records regarding insurance on respect of immovable property
  
- 1.6 Risk management and audit
  - 1.6.1 Audit reports
  - 1.6.2 Risk management frameworks
  - 1.6.3 Risk management plans and risk registers
  
- 1.7 Safety, health and environment
  - 1.7.1 Complete safety, health and environment risk assessment
  - 1.7.2 Environmental managements plans and
  - 1.7.3 Inquiries, inspections, examinations by environmental authorities
  
- 1.8 Information technology
  - 1.8.1 Computer / mobile device usage policy documentation
  - 1.8.2 Disaster recovery plans
  - 1.8.3 Hardware asset registers
  - 1.8.4 Information security policies / standards / procedures
  - 1.8.5 Information technology systems and user manuals
  - 1.8.6 Information usage policy documentation
  - 1.8.7 Project implementation plans
  - 1.8.8 Software licensing and
  - 1.8.9 System documentation and manuals

## Appendix B - Records available in terms of any other legislation

Southern Ropes retains records which are required in terms of legislation other than PAIA. Certain legislation provides that private bodies shall allow certain persons access to specified records upon request. Legislation that may be consulted to establish whether the Requester has a right of access to a record other than in terms of the procedure set out in the PAIA is set out below. This list is not exhaustive.

Basic Conditions of Employment Act 75 of 1997  
Broad Based Black Economic Empowerment Act 53 of 2003  
Companies Act 71 of 2008  
Compensation for Occupational Injuries and Diseases Act 130 of 1993  
Competition Act 89 of 1998  
Customs and Excise Act 91 of 1964  
Electronic Communications Act 36 of 2005  
Employment Equity Act 55 of 1998  
Financial Markets Act 19 of 2012  
Income Tax Act 58 of 1962  
Labour Relations Act 66 of 1995  
National Environmental Management Act 107 of 1998  
National Minimum Wage Act 9 of 2018  
Occupational Health and Safety Act 85 of 1993  
Prevention and Combating of Corrupt Activities Act 12 of 2004  
Promotion of Equality and Prevention of Unfair. Discrimination Act 4 of 2000  
Protected Disclosures Act 26 of 2000  
Protection of Personal Information Act 4 of 2013  
Insurance Act 18 of 2017  
Skills Development Act 97 of 1998  
Skills Development Levies Act 9 of 1999  
Tax Administration Act 28 of 2011  
Unemployment Insurance Act 63 of 2001  
Unemployment Insurance Contributions Act 4 of 2002  
Value Added Tax Act 89 of 1991

## Appendix 3 - Prescribed form

### REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

#### [Regulation 10]

#### A. Particulars of private body

The Head / designated person \_\_\_\_\_  
\_\_\_\_\_

#### B. Particulars of person requesting access to the record

The particulars of the person who requests access to the record must be given below.  
The address and/or fax number in the Republic to which the information is to be sent must be given.  
Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname \_\_\_\_\_

Identity number \_\_\_\_\_

Postal address \_\_\_\_\_

Fax number \_\_\_\_\_

Telephone number \_\_\_\_\_

E-mail address \_\_\_\_\_

Capacity in which request is made, when made on behalf of another person \_\_\_\_\_  
\_\_\_\_\_

#### 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 and surname \_\_\_\_\_

Identity number \_\_\_\_\_

## D. Particulars of record

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record \_\_\_\_\_

2. Reference number, if available \_\_\_\_\_

3. Any further particulars of record \_\_\_\_\_

## E. Fees

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. You will be notified of the amount required to be paid as the request fee.

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.

If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees \_\_\_\_\_

## F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability \_\_\_\_\_

Form in which record is required \_\_\_\_\_

Mark the appropriate box with an **X**.

### NOTES

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access to the record, if any, will be determined partly by the form

#### 1. If the record is in written or printed form

	copy of record*		inspection of record
--	-----------------	--	----------------------

#### 2. If record consists of visual images

(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):

	View the images		Copy of the images*		Transcription of the images*
--	-----------------	--	---------------------	--	------------------------------

#### 3. If record consists of recorded words or information which can be reproduced in sound

	Listen to the soundtrack (audio cassette)		Transcription of soundtrack* (written or printed document)
--	--	--	---

#### 4. If record is held on computer or in an electronic or machine-readable form

	Printed copy of record*		Printed copy of information derived from the record*		Copy in computer readable form* (stiffy or compact disc)
--	-------------------------	--	--	--	---

\*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?

**Postage is payable.**

YES

NO

## 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 the additional folios.**

1 Indicate which right is to be exercised or protected \_\_\_\_\_

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

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### Notice of decision regarding request for access.

You will be notified in writing whether your request has been approved / denied. If you wish to be informed 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?

---

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20

---

Signature of requester / person  
on whose behalf request is made

## Appendix 4 - Prescribed fees

The following applies to requests (other than personal requests):

- 1.1 A requestor is required to pay the prescribed fees (R50.00) before a request will be processed
- 1.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted)
- 1.3 A requestor may lodge an application with a court against the tender / payment of the request fee and / or deposit
- 1.4 Records may be withheld until the fees have been paid
- 1.5 Payments should be made to Southern Ropes (Pty) Ltd

### Fees in respect of private bodies.

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4 size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows

	R
(a) For every photocopy of an A4 size page or part thereof	1,10
(b) For every printed copy of an A4 size page or part thereof held on a computer or in electronic or machine- readable form	0,75
(c) For a copy in a computer-readable form on -	
(i) Compact disc	70,00
(ii) Other Removable disc	150,00
(d) (i) For a transcription of visual images, for an A4 size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(i) For a transcription of an audio record, for an A4 size page or part thereof	20,00
(ii) For a copy of an audio record	30,00

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.

4. The access fees payable by a requester referred to in regulation 11(3) are as follows:

	R
(1) (a) For every photocopy of an A4 size page or part thereof	1,10
(b) For every printed copy of an A4 size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c) For a copy in a computer-readable form on -	
(i) Compact disc	70,00
(ii) Other Removable disc	150,00
(d) (i) For a transcription of visual images, for an A4 size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(e) (i) For a transcription of an audio record, for an A4 size page or part thereof	20,00
(ii) For a copy of an audio record	30,00
(f) To search for and prepare the record for disclosure, for each hour or part of an hour reasonably required for such search and preparation.	30,00

(2) For purposes of section 54(2) of the Act, the following applies

- (a) Six hours as the hours to be exceeded before a deposit is payable and
- (b) One third of the access fee is payable as a deposit by the requester

(3) The actual postage is payable when a copy of a record must be posted to a requester.