



# PAIA and POPI Manual

**THIS MANUAL WAS PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 AND TO ADDRESS REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013**

**This manual applies to SGT SOLUTIONS (PTY) LTD**

**Registration number: 1963/006462/07**

**("Company")**

**Registered office address:**

**58 Oak Avenue, Highveld Techno Park, Centurion, 0157, South Africa**

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**"UNCONTROLLED IF PRINTED"**

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## Document Management

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## 1. INTRODUCTION

The **Promotion of Access to Information Act 2 of 2000 (“PAIA”)**, gives third parties the right to approach private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the private body or government is obliged to release such information unless PAIA expressly states that the records containing such information may or must not be released. This manual informs requestors of procedural and other requirements which a request must meet as prescribed by PAIA as read together with the **Protection of Personal Information Act 4 of 2013 (“PoPI”)**.

### **Nature of Business**

SGT is an end-to-end high-technology solution provider focused on emerging opportunities throughout the telecommunications and power technologies industry. It is also a private company duly incorporated in terms of and operating under the Laws of South Africa, owned by Main Street 1653 (Pty) Ltd, a subsidiary of African Equity Empowerment Investments Ltd.

### **Contact Details ITO Section 51(1)(a) of PAIA**

Name of body: SGT Solutions (Pty) Ltd

Head of body: Dr A V Scholtz (CEO)

Information Officer: Adv J Kruger

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## **2. GUIDE OF THE HUMAN RIGHTS COMMISSION ITO SECTION 10 OF PAIA [READ TOGETHER WITH SECTION 51(1)(b)]**

A guide to PAIA (as compiled in terms of Section 10 of PAIA by the Human Rights Commission) is available from the South African Human Rights Commission. The guide contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA. Any enquiries regarding this guide and its contents should be directed to:

The South African Human Rights Commission:

PAIA Unit (the Research and Documentation Department)

Postal address: Private Bag 2700, Houghton, 2041

Telephone: +27 11 484 8300

Fax: +27 11 484 7146

Website: [www.sahrc.org.za](http://www.sahrc.org.za)

Email: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

### 3. TERMS AND DEFINITIONS OF ABBREVIATIONS IN THIS MANUAL

<b>SGT</b>	:	SGT Solutions (Pty) Ltd
<b>BU</b>	:	Business Unit
<b>CEO</b>	:	Chief Executive Officer
<b>GM</b>	:	General Manager

#### **Company:**

SGT Solutions (Pty) Ltd

#### **CEO:**

Chief Executive Officer of SGT Solutions (Pty) Ltd

#### **EXCO**

Executive Committee Member

#### **Group**

Main Street 1653 (Pty) Ltd, a subsidiary of African Equity Empowerment Investments Ltd (AEEI)

### 3.1 WORDS BEARING THE SAME MEANING AS UNDER PAIA

**Private body:** means any former or existing juristic person, but excludes a public body.

**Public body:** means-

- (a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
- (b) any other functionary or institution when-
  - i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
  - ii) exercising a public power or performing a public function in terms of any legislation.

**Record:** of, or in relation to, a public or private body, means any recorded information-

- a) regardless of form or medium;

- b) in the possession or under the control of that public or private body, respectively; and whether or not it was created by that public or private body, respectively.

**Requester:** in relation to a private body, means-

- a) any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or
- b) or any person acting on behalf of the person contemplated in subparagraph (a).

**Third party:** in relation to a request for access to a record of a private body, means any person (including, but not limited to, a public body) other than the Requester.

### 3.2 WORDS BEARING THE SAME MEANING AS UNDER POPI

**Consent:** means a voluntary, specific and informed expression of will in terms of which a DS agrees to the processing of PI relating to him or her.

**Data Subject:** or “**DS**” means the person to whom personal information relates.

**Minister:** means the Minister of Justice and Constitutional Development.

**Personal information:** or “**PI**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including but not limited to:

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
- d) the blood type or any other biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g) the views or opinions of another individual about the person; and
- h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

**Private body:** means a natural person, partnership or any former or existing juristic person (excluding a public body), who carries or has carried on any trade, business or profession in that capacity.

**Processing:** means any operation or activity or any set of operations, whether by automatic means,

concerning personal information, including:

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or
- c) merging, linking, as well as blocking, degradation, erasure or destruction of information.

**Public body:** means any department or state or administration in the national, provincial or local sphere of government or functionary exercising public power.

**Responsible Party:** or “RP” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information.

**Submit:** means submit by—

- a) registered post;
- b) electronic mail;
- c) facsimile; or
- d) personal delivery.

#### **4. REFERENCE DOCUMENTS**

Company Policies / Processes / Procedures

Quality Manual

Delegation of Authority

#### **5. NOTICE IN TERMS OF SECTION 52(2) OF PAIA [READ TOGETHER WITH SECTION 51(1)(c)]**

At this stage no notices have been published in terms of Section 51(1)(c) on the categories of records that are automatically available without a person having to request access in terms of PAIA.

#### **6. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION: SECTION 51(1)(d) OF PAIA**

*The Requester may also request information that is available in terms of the following legislation:*

Basic Conditions of Employment Act 75 of 1997

Broad-Based Black Economic Empowerment Act 53 of 2003

Compensation for Occupational Injuries and Disease Act 61 of 1997

Companies Act 71 of 2008

Employment Equity Act 55 of 1998

Financial Intelligence Centre Act 38 of 2001

Financial Markets Act 19 of 2012

Income Tax Act 58 of 1962

Labour Relations Act 66 of 1995  
Occupational Health and Safety Act 85 of 1993  
Promotion of Access to Information Act 2 of 2000  
Protected Disclosures Act 26 of 2000  
Skills Development Act 97 of 1998  
Skills Development Levy Act 9 of 1999  
Securities Transfer Tax Act 25 of 2007  
Securities Transfer Tax Administration Act 26 of 2007  
Trade Marks Act 194 of 1993  
Unemployment Insurance Act 63 of 2001  
Unemployment Insurance Contributions Act 4 of 2002  
Value Added Tax Act 89 of 1991

## **7. SCHEDULE OF RECORDS HELD ITO SECTION 51(1)(d) OF PAIA**

Section 3 of PAIA states that the Act applies to a record of a private body, regardless of when it came into existence.

The information is classified and grouped according to records relating to the following subjects and categories:

It is recorded that the accessibility of the documents listed herein below, may be subject to the grounds of refusal set out in Chapter 4 of PAIA.

### **7.1 COMPANY SECRETARIAL RECORDS**

Company Secretarial Records

Documents of incorporation and association i.e. Memorandum and Articles of Association

Documents lodged at the Registrar of Companies subsequent to incorporation

Minutes of meetings

Records relating to the appointment of directors/auditor/secretary/public officer and other officers

Share register and other statutory registers

Share certificates

### **7.2 FINANCIAL RECORDS**

Annual Financial Statements

Accounting Records

Banking Records

Bank Statements

Paid Cheques

Electronic Banking Records

Asset Register

Invoices

### **7.3 INCOME TAX RECORDS**

PAYE Records

Income Tax Records

Documents issued to employees for income tax purposes

Records of payments made to SARS on behalf of employees

All other statutory compliances:

VAT returns

Skills Development Levies

UIF returns

Workmen's Compensation

### **7.4 PERSONNEL DOCUMENTS AND RECORDS**

Employment contracts

Forms and applications

Standard letters and notices

Payroll reports

Pay slips

IRP5's

Medical Aid records

Pension Fund records

Disciplinary Code and Grievance Procedure

Salary records

SETA records

Leave records

Training records

Employee benefits arrangements rules and records

Health and Safety & Environment records

### **7.5 RECORDS RELATING TO CUSTOMERS AND BROKERS**

Policy applications

Policy schedule

Correspondence

Information regarding policies

Quotes

Medical reports

Acknowledgement of policy documents

Broker contracts

### **7.6 MOVABLE AND IMMOVABLE PROPERTY**

Title deeds

Lease agreements

Sale agreements

## **8. PERSONS WHO MAY REQUEST INFORMATION OR RECORDS**

### **8.1 PURPOSE FOR WHICH INFORMATION IS REQUIRED**

PAIA provides that a person may only request information, if that information is required for the exercise or protection of a right.

Further, Section 23 of PoPI provides that a DS may, upon proof of identity, request the RP to confirm, free of charge, all the information it holds about the DS and may request access to such information, including information about the identity of third parties who have or have had access to such information.

PoPI further provides that where the DS is required to pay a fee for services provided to him/her/it the RP:

- Must provide the DS with a written estimate of the payable amount before providing the service; and
- May require that the Requester pay a deposit for all or part of the fee.

### **8.2 CATEGORIES OF REQUESTERS**

The capacity under which a Requester requests a record of documentation/ information will determine the category he or she falls in, noting that the Requester category has a bearing on the conditions of access to the information.

Requesters have been classified into four categories:

- Personal Requester: requests information about himself/herself/itself.
- Representative Requester: requests information relating to and on behalf of someone else.
- Third-Party Requester: requests information about another person.
- Public Body: requests information in the public interest.

## **9. REQUEST PROCEDURE ITO SECTION 51 (1) (e) OF PAIA**

The Requester must complete Form C (attached to this Manual as **Appendix 1**) and submit this form together with a request fee as per the table at Section 12 below, to the Information Officer of SGT.

The form must be submitted to the Information Officer of SGT at the address, fax number, or electronic mail address as provided in this Manual.

The form must:

- provide sufficient particulars to enable the Head of SGT to identify the record/s requested and to identify the Requester;
- indicate which form of access is required;
- specify a postal address or fax number of the Requester in the Republic;
- identify the right that the Requester is seeking to exercise or protect, and provide an

explanation of why the requested record is required for the exercise or protection of that right;

- if in addition to a written reply, the Requester wishes to be informed of the decision on the request in any other manner, to state that manner and the necessary to be informed in the other manner; and
- if the request is made on behalf of another person, to submit proof of the capacity in which the Requester is making the request, to the reasonable satisfaction of the Head of SGT.

The Information Officer of SGT may refuse a request for access to a record if its disclosure would involve the unreasonable disclosure of personal information about a third party, including a deceased individual.

Furthermore, the Information Officer of SGT may refuse a request for access to a record of the company if the record contains trade secrets, financial, commercial, scientific and technical information, the disclosure of which could harm the interests of SGT.

Similarly, the above refusal grounds apply in respect of the commercial information of third parties held by SGT. Access to such records will require the written permission of the third party concerned before the company will permit access to the specified records.

In accordance with the above mandatory refusal grounds, the Information Officer will decide whether to accede to a request for access to information.

Any search, reproduction, and document preparation necessitated by requests for information will be undertaken in accordance with the prescribed fees.

## **10. DECISION ON REQUEST AND NOTICE THEREOF ITO SECTION 56 OF PAIA**

The CEO of SGT or his designated Information Officer to whom the request is made must, as soon as reasonably possible, and within 30 days, after the request has been received decide in accordance with PAIA whether to grant the request; and notify the Requester of the decision.

## **11. GRANTING OR REFUSAL OF REQUESTS**

All requests that comply with the requirements of PAIA and PoPI will be processed and considered timeously, once the prescribed fees have been provided.

If the request for access is granted then will advise the Requester on the following:

- the prescribed fee for accessing the information or documentation;
- payable deposit fee and balance outstanding;
- the form in which access will be given; and
- the right to lodge an internal appeal against the access fee to be paid or the form of

access to be granted.

SGT will give the Requester a written notice of the decision within 30 days after the decision has been made. In case of a request being refused, the notification will include the reasons for the refusal.

## **12. EXTENSION OF PERIOD TO DEAL WITH A REQUEST ITO SECTION 57 OF PAIA**

In terms of Section 57, the Information Officer to whom a request for access has been made or transferred, may extend the original 30-day period in which to provide the record if:

- The request is for a large number of records or requires a search through a large number of records that would unreasonable interfere with the activities of SGT;
- The records requested are held at an off-site location where the request cannot reasonably be completed within the original period; and
- Consultations with the Board of Directors of SGT is necessary or desirable to decide upon the request that cannot reasonably be completed within the original period.

SGT, through its Information Officer, must deliver a notice to the Requester to notify the Requester of the extension, stating the period for the extension, adequate reasons for the extension and that the Requester may lodge an appeal against the extension, if it so deemed necessary by the Requester.

## **13. DEEMED REFUSAL OF A REQUEST ITO SECTION 58 OF PAIA**

Section 58 requires that where the Information Officer of SGT fails to give the decision on a request for access to the Requester within the original or extended period, the request must be regarded as having been refused.

## **14. SEVERABILITY ITO SECTION 59 OF PAIA**

Section 59 states that where a request for access is made to a record containing information which may or must be refused on any of the grounds under Chapter 4, every part of the record which does not contain and can reasonably be severed from any part that contains any such information must be disclosed.

## **15. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS ITO SECTIONS 62 – 70 OF PAIA**

If the request for access is refused then SGT will advise the Requester about the reasons for refusal of access and may advise the Requester to lodge an application with the court against the refusal of the request after the Requester has exhausted all the internal appeal processes. Chapter 4 of PAIA, Sections 62 to 70, stipulate the following grounds for refusing requests for information:

- protection of the privacy of a third party who is a natural person;
- protection of commercial information of a third party;

- protection of certain confidential information of a third party;
- protection of safety of individuals and protection of property;
- protection of records privileged from production in legal proceedings;
- commercial information of SGT; and
- protection of research information of a third party and of SGT.

These grounds of refusal are also endorsed under PoPI.

### **15.1 MANDATORY PROTECTION OF PRIVACY OF THIRD PARTY WHO IS A NATURAL PERSON ITO SECTION 63 OF PAIA**

Section 63 states that a Head of a private body or his designated Information Officer must refuse a request for access to a record of the body if its disclosure would involve the unreasonable disclosure of Personal Information about a third party, including a deceased individual.

The record may not be refused where -

- the natural person has consented to the disclosure or the record;
- the record is already publicly available;
- the record was given to the Head of SGT by the individual to whom it relates and the individual was informed by or on behalf of SGT, that the information belongs to a class of information that would or might be available to the public;
- the record is about the mental or physical health, or well-being, of an individual who is under the care of the Requester, and where giving access would be in the individual's best interests;
- the record is about an individual who is deceased and the Requester is the individual's next of kin or the request is made with the written consent of the deceased individual's next of kin; or
- the individual is or was an official of SGT and relates to the position or functions of the individual.

### **15.2 MANDATORY PROTECTION OF COMMERCIAL INFORMATION OF THIRD-PARTY ITO SECTION 64 OF PAIA**

The CEO of SGT or his designated Information Officer may refuse a request for access to a record if the record contains:

- trade secrets of a third party;
- financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of the third party; or
- information supplied in confidence by a third party, the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations; or to prejudice that third party in commercial competition.

A record may not be refused insofar as it consists of information about a third party who has consented in terms of Section 72 or otherwise in writing to its disclosure to the Requester concerned; or the results of any product or environmental testing or other investigation supplied by a third party or the results of any such testing or investigation carried out by or on behalf of a third party and its disclosure would reveal a serious public safety or environmental risk.

### **15.3 MANDATORY PROTECTION OF CONFIDENTIAL INFORMATION OF THIRD-PARTY ITO SECTION 65 OF PAIA**

Whilst SGT will make every reasonable effort to assist a Requester to access a record, access must be refused where disclosure of the record will constitute a breach of a duty of confidence owed to a third party in terms of an agreement, as per Section 65.

### **15.4 MANDATORY PROTECTION OF SAFETY OF INDIVIDUALS AND PROTECTION OF PROPERTY ITO SECTION 66 OF PAIA**

The Head of a private body must refuse a request for access to a record of the body if its disclosure could reasonably be expected to endanger the life or physical safety of an individual; or may refuse a request for access to a record of the body if its disclosure would be likely to prejudice or impair the security of any buildings, structures or computer and communication system, a means of transport or any other property.

### **15.5 MANDATORY PROTECTION OF RECORDS PRIVILEGED FROM PRODUCTION IN LEGAL PROCEEDINGS ITO SECTION 67 OF PAIA**

The Head of a private body must refuse a request for access to a record of the body if the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege, as per the requirements of Section 67.

### **15.6 COMMERCIAL INFORMATION OF PRIVATE BODY ITO SECTION 68 OF PAIA**

The Head of SGT or his designated Information Officer may refuse a request for access to a record if the record contains:

- trade secrets of SGT;
- financial, commercial, scientific or technical information, other than trade secrets of SGT and the disclosure of which would be likely to cause harm to the commercial or financial interests of the body;
- contains information, the disclosure of which could reasonably be expected to put SGT at a disadvantage in contractual or other negotiations; or to prejudice SGT in commercial competition; or

- is a computer program and is owned by SGT.

A record may not be refused insofar as it consists of information about the results of any product or environmental testing or other investigation supplied by SGT or the results of any such testing or investigation carried out by or on behalf of SGT and its disclosure would reveal a serious public safety or environmental risk.

#### **15.7 MANDATORY PROTECTION OF RESEARCH INFORMATION OF THIRD PARTY, AND PROTECTION OF RESEARCH INFORMATION OF PRIVATE BODY ITO SECTION 69 OF PAIA**

The Head of a private body must refuse a request for access to a record of the body if the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose-

- a) the third party;
- b) a person that is or will be carrying out the research on behalf of the third party; or
- c) the subject matter of the research, to serious disadvantage.

Similarly, SGT may refuse the request on the above grounds where a serious disadvantage may follow the private body.

#### **15.8 MANDATORY DISCLOSURE IN PUBLIC INTEREST ITO SECTION 70 OF PAIA**

The Head of SGT must grant a request for access to records that are:

- Commercial information of a third party;
- Certain confidential information of a third party;
- The safety of individuals and the protection of property;
- Records privileged from production in legal proceedings;
- Commercial information of private body and of a third party; or
- Information of third party and protection of research information of private body.

This must be done if the disclosure of the record in the categories above would reveal evidence of a substantial contravention of or failure to comply with the law or there is an imminent and serious public safety or environmental risk and the public interest clearly outweighs the harm contemplated in the provisions above in question.

### **16. PRESERVATION OF RECORDS UNTIL FINAL DECISION IS MADE**

Where the Information Officer of SGT receives a request for access to a record, we will take those steps which are reasonably necessary to preserve the record, without deleting any information contained in it, until the Requester has been notified of the decision regarding the request.

## **17. RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST ITO SECTION 55 OF PAIA**

Section 55 states that where all reasonable steps have been taken to find a record requested and there are reasonable grounds to believe that the record is in SGT's possession but cannot be found or does not exist, the Information Officer will, by way of an affidavit or affirmation, notify the Requester that it is not possible to give access to that record.

The affidavit or affirmation must give a full account of all the reasonable steps taken to find the record or to determine if the record exists. The affidavit will then be deemed to be a refusal to the request to access of the said record.

Where the record is later found, after the notice of refusal has been given, the Requester must be notified and provided access to the record, unless such access must again be refused on a ground of refusal contained in Chapter 4 of PAIA.

## **18. MANNER OF OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION**

Section 2(1) and (2) of the latest PoPI Regulations of 2018 have recently amended Section 23 of PoPI to indicate that a DS may object in writing to the processing of PI, by submitting the objection on **Form 1** (attached to this manual) to the RP.

The RP (or a person designated for that purpose by the RP) must then proceed to assist the DS to the best of his or her ability with the completion of **Form 1**.

## **19. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION**

Section 24 of PoPI states that a DS may request a RP, on the prescribed form, to correct or delete any information about the DS that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or that which was obtained unlawfully. Further, the RP must delete or destroy the information of a DS that it is no longer authorised to retain.

Section 3(1) of the latest PoPI Regulations of 2018 indicate that a DS must submit a request on **Form 2** (attached to this manual) to the RP.

The RP (or a person designated for that purpose by the RP) must then proceed to assist the DS to the best of his or her ability with the completion of **Form 2**.

## **20. APPEAL/LODGING OF COMPLAINT PROCEDURE**

PAIA makes provision for the lodging of a complaint against:

- Access fee charged or the form of access granted;
- Refusal of the request to grant access;
- Decision to extend the 30 days' period for granting the requested access; or
- Form in which access is granted.

A Requester aggrieved by SGT's decision or who wishes to lodge a complaint or appeal must follow this process:

A compliant or an internal appeal must:

- be lodged within 30 days after the decision is communicated to the Requester;
- be delivered or sent to the address, fax or electronic mail address contained in Section 3 above;
- identify the subject of the complaint or internal appeal and state the reasons for the complaint or internal appeal;
- be accompanied by the prescribed appeal fee as prescribed; and
- specify a postal address, fax number or electronic mail for the return of the decision.

Where, in addition to a written reply, the complainant/appellant wishes to be informed of the decision in any other manner he/she/it must state that manner and provide the necessary particulars to be so informed.

The complainant/appellant who is not happy with the decision of the internal process may lodge an application with a court against the decision made within 30 days after the decision was communicated to him/her/it. Where the compliant or internal appeal is lodged after the expiry of the 30-day period the information Officer may, on good cause shown, allow the late lodging of the complaint or internal appeal.

## 21. FEES IRO PRIVATE BODIES ITO SECTION 54 OF PAIA

Section 54 of PAIA entitles a private body to levy a prescribed request fee to a Requester before further processing the request. The fees that may be charged have been published by the Minister of Justice and Constitutional Development and are displayed below.

According to PoPI a RP is entitled to levy a prescribed fee for the provision of PI about the DS in its possession.

FEE	R
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.	
The fees for reproduction referred to in regulation 11(1) are as follows:	
(a) For every photocopy of an A4-size page or part thereof	2.20

FEE	R
(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) memory stick	89.00
(ii) compact disc	70.00
(d) For a transcription of visual images	
(i) For an A4-size page or part thereof	40.00
(ii) For a copy of visual images	60.00
(e) For a transcription of an audio record	
(i) For an A4-size page or part thereof	20.00
(ii) For a copy of an audio record	30.00
The request fee payable by a Requester, other than a personal Requester, referred to in regulation 11(2)	50.00
The access fees payable by a Requester referred to in regulation 11(3) are as follows:	
(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) memory stick	89.00
(ii) compact disc	
(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, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	
(2) For purposes of Section 54(2), 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.	

## 22. ADDITIONAL INFORMATION ITO SECTION 51(1)(f) OF PAIA

Section 51(1)(f) grants the Minister powers to publish a notice prescribing any other information that companies will have to disclose.

## **23. OTHER CONSIDERATIONS**

### **23.1 KING IV REPORT ON CORPORATE GOVERNANCE**

It is SGT's policy to conduct its business in compliance with all legal and regulatory requirements and as such we govern our business based on sound corporate governance principles. The King IV Report requires that all governing bodies must ensure that their organisations protect the privacy of personal information, as an integral part of the company's information technology governance.

## **24. MANUAL AVAILABILITY ITO SECTION 51(3) OF PAIA**

In addition to the availability of this Manual at the South African Human Rights Commission, this Manual is also available from the Information Officer of SGT, by means of the different forms of request as detailed above.

Furthermore, as per the requirements of Section 4(e) of the Regulations of 2018, this manual is available at the SGT Information Officer and is available for inspection during normal business hours, free of charge.

## Appendix 1: Prescribed Form C To Be Completed By A Requester

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:

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

- |     |   |
|-----|---|
| (a) | The particulars of the person who requests access to the record must be given below.                |
| (b) | The address and/or fax number in the Republic to which the information is to be sent must be given. |
| (c) | 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 <i>ONLY</i> if a request for information is made on behalf of <i>another</i> person.
---

Full names and surname:

Identity number:

### D. Particulars of record

- |     |  |
|-----|--|
| (a) | 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. |
| (b) | 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) 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.
- (b) You will be *notified of* the amount required to be paid as the request fee.
- (c) 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.
- (d) 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
Form in which record is required: Mark the appropriate box with an X.	
<p>NOTES:</p> <ul style="list-style-type: none"> <li>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</li> <li>(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.</li> <li>(c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.</li> </ul>	

<b>1. If the record is in written or printed form:</b>			
	copy of record*		inspection of record
<b>2. If record consists of visual images</b> this includes photographs, slides, video recordings, computer-generated images, sketches, etc)			
	view the images	copy of the images"	transcription of the images*
<b>3. If record consists of recorded words or information which can be reproduced in sound:</b>			
	listen to the soundtrack audio cassette	transcription of soundtrack* written or printed document	
<b>4. If record is held on computer or in an electronic or machine-readable form:</b>			
	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

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**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:

**H. 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

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**FORM 1**  
**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF**  
**SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.**  
**4 OF 2013)**  
  
**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
[Regulation 2]

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

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Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject/designated person*

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**FORM 2**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR  
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF  
SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.  
4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018  
[Regulation 3]**

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

**Request for:**

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	

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Fax number/ E-mail address:	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED</b>
<b>D</b>	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i>

Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject/ designated person*