

GreatSoft Proprietary Limited

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. LIST OF ACRONYMS AND ABBREVIATIONS

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| 1.1 | “IO” | Information Officer; |
| 1.2 | “Minister” | Minister of Justice and Correctional Services; |
| 1.3 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.4 | “POPIA” | Protection of Personal Information Act No. 4 of 2013; |
| 1.5 | “Regulator” | Information Regulator; |
| 1.6 | “Republic” | Republic of South Africa. |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to –

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF GREATSOFT PROPRIETARY LIMITED

3.1 Chief Information Officer

Name: Jean Pick
Tel: +27837821666
Email: jeanp@greatsoft.co.za

3.2 Deputy Information Officer

Name: Michael Smit
Tel: +27727993648
Email: michaels@greatsoft.co.za

3.3 Access to Information general contact

Email: natashaw@greatsoft.co.za

3.4 Head Office

Postal Address: C7 Pinelands Business Park
Avonduur Road
Pinelands
Cape Town
7405

Physical Address: C7 Pinelands Business Park
Avonduur Road
Pinelands
Cape Town
7405

Telephone: +27215317180

Email: jeanp@greatsoft.co.za

Website: www.greatsoft.co.za

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

- 4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (Guide), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2 The Guide is available in each of the official languages and in braille
- 4.3 The aforesaid Guide contains the description of-
 - 4.3.1 the objects of PAIA and POPIA;
 - 4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1 the Information Officer of every public body, and
 - 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA ;
 - 4.3.3 the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.4 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.5 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-
 - 4.3.5.1 an internal appeal;
 - 4.3.5.2 a complaint to the Regulator; and
 - 4.3.5.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
 - 4.3.6 the provisions of sections 14[5] and 51[8] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.3.7 the provisions of sections 15[1] and 52[2] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.3.8 the notices issued in terms of sections 22[1] and 54[2] regarding fees to be paid in relation to requests for access; and
 - 4.3.9 the regulations made in terms of section 92[11].

5. CATEGORIES OF RECORDS OF GREATSOFT PROPRIETARY LIMITED WHICH MAY BE AVAILABLE UPON REQUEST

(Records that are not automatically available must be requested via the “Request to Access Process” outlined in this manual)

- 5.1 Administration Records
- 5.2 Human Resource Records
- 5.3 Operation Records
- 5.4 Finance Records
- 5.5 Information Technology Records

6. RECORDS HELD IN ACCORDANCE WITH ANY OTHER APPLICABLE LEGISLATION

Basic Conditions of Employment 75 of 1997
Companies Act 71 of 2008
Compensation for Occupational Injuries and Disease Act 130 of 1993
Consumer Protection Act 68 of 2008
Copyright Act 98 of 1978
Electronic Communications Act 36 of 2005
Electronic Communications and Transactions Act 25 of 2002
Employment Equity Act 55 of 1998
Financial Intelligence Centre Act 38 of 2001
Income Tax Act 58 of 1962
Labour Relations Act 66 of 1995
National Credit Act 34 of 2005
Occupational Health and Safety Act 85 of 1993
Protection of Personal Information Act 4 of 2013
Skills Development Act 97 of 1998
Skills Development Levies Act 9 of 1999
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. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY GREATSOFT PROPRIETARY LIMITED

7.1 Administration Records

- Attendance registers
- Correspondence
- Founding Documents
- Licences (categories)
- Minutes of Management Meetings
- Minutes of Staff Meetings
- Shareholder Register

7.2 Human Resource Records

- Conditions of Service
- Employee Records
- Employment Contracts
- Employment Equity Records
- General Correspondence
- Industrial and Labour Relations Records
- Information relating to Health and Safety Regulations
- Pension and Provident Fund Records
- Medical Aid Records
- Performance Appraisals
- Personnel Guidelines, Policies and Procedures
- Remuneration Records and Policies
- Skills Requirements
- Staff Recruitment Policies
- Statutory Records
- Training Records

7.3 Operation Records

- Brochures on Company Information
- Client and Customer Registry
- Contracts
- General Correspondence
- Information relating to Employee Sales Performance
- Information relating to Work-In-Progress
- Marketing and Future Strategies

- Marketing Records
- Production Records
- Sales Records
- Suppliers Registry

7.4 Finance Reports

- Annual Financial Statements
- Asset Register
- Banking Records
- Budgets
- Contracts
- Financial Transactions
- General Correspondence
- Insurance Information
- Internal Audit Records
- Management Accounts
- Purchase and Order Information
- Tax Records (company and employee)

7.5 Information Technology Records

- IT Policies and Procedures
- Network Diagrams
- User Manuals

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Personal Information that may be processed

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

8.2.1 Purpose of Processing

- Fulfilling statutory obligations in terms of applicable legislation
- Historical record keeping, research and recording statistics necessary for fulfilling your business objectives
- Keeping of accounts and records
- Marketing and advertising

- Monitoring, maintaining and managing our contractual obligations to customers, clients, suppliers, service providers, employees, directors and other third parties
- Obtaining information necessary to provide contractually agreed services to clients
- Resolving and tracking complaints
- Staff administration
- Verifying information provided to us

8.2.2 Data Subjects

- Clients and client's employees, representatives, agents, contractors and service providers
- Existing and former employees (including contractors, agents, temporary and casual employees)
- Our stakeholders
- Suppliers and service providers and their respective authorised employees, representatives, agents, contractors and service providers of such suppliers and service providers

8.2.3 Natural Persons

- Confidential correspondence
- Date of birth
- Email address
- Gender
- ID number
- Names
- Nationality
- Physical and postal addresses
- Tax related information
- Telephone number

8.2.4 Juristic Persons

- Authorised signatories, beneficiaries, ultimate beneficial owners
- BBBEE information
- Financial information
- Founding documents
- Name of Legal Entity
- Names of contact persons
- Physical and Postal address and contact details
- Registration Number
- Tax related information

8.2.5 Special Information

- Racial / ethnic origin
- Religious or other beliefs

8.3 The recipients or categories of recipients to whom the personal information may be supplied

- Acceptable usage of personal information
- Auditors
- Banks and other financial institutions
- Employees of the organisation
- Employment and recruitment agencies
- Regulatory, statutory and government bodies
- Suppliers, service providers, vendors, agents and representatives of such entities
- Trade unions

8.4 General description of Information Security Measures by the responsible party to ensure the confidentiality, integrity and availability of the information

We have implemented generally accepted standards of technology and operational security in order to protect personal information from loss, misuse, alteration or destruction. We also take reasonable steps to keep personal information accurate, current, complete, confidential and reliable for its intended use.

9. REQUEST TO ACCESS PROCESS

To request access to a record, below process is to be followed:

- 9.1 Use the prescribed Form C, which is available from SAHRS website at this link:
<http://www.sahrc.org.za/home/21/files/Form%20C.doc%20August%202013.doc>
- 9.2 Submit your request with the completed form and relevant prescribed fee to our Information Officer via email or physical address (details provided above);
- 9.3 Please ensure that your application provides sufficient details and information to enable the Information Officer to identify:
 - The record/s requested;
 - The requester;
 - Form of access required;
 - Postal address or email address of requester (or provide any other way you would like to be informed of our decision other than in writing);
 - The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

If the standard form is not used, we may reject the request due to lack of compliance and refuse application if insufficient information is provided.

Prescribed fees can be found on the SAHRS website at this link:

<http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

Notification of our decision shall be done in writing within 30 (thirty) days after receiving completed form with all relevant information.

Grounds for refusal

We are entitled as a Private Body to refuse a request for information. Access may have to be refused to certain records in terms of PAIA to protect:

- Privacy of a third party who is a natural person or a juristic (including personal information);
- Company's confidential information;
- Commercial information of a third party;
- Safety of individuals and property;
- Records regarded as privileged in legal proceedings; or
- Research information.

Should the request for access be denied, you may apply to a court or lodge a complaint with the Information Regulator for relief.

10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available in English –

10.1.1 on our website;

10.1.2 our Head Office for public inspection during normal business hours;

10.1.3 to the Information Regulator upon request;

10.1.4 to any person upon request and upon the payment of a reasonable prescribed fee.

10.2 A fee for the copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

11. UPDATING OF THE MANUAL

The head of GreatSoft Proprietary Limited will update this manual at such intervals as may be deemed necessary.

Issued by



Jean Pick

Chief Information Officer