
PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

Prepared in accordance with Section 51 of The Promotion of Access to Information Act
2/2000 (the "Act").

June 2021

Information, data and drawings embodied in this document are strictly confidential and are supplied on the understanding that they will be held confidentially and not disclosed to third parties without prior written permission and without consent of Sintrex Integration Services (Pty) Ltd

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2. Introduction

The Promotion of Access Information Act, No. 2 of 2000 (the “Act”) was enacted on 3 February 2000, giving effect to the constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 (‘the Constitution’) of access to any information held by the State and any information that is held by another person that is required for the exercise of protection.

In terms of Section 51 of the Act, all Private Bodies are required to compile an Information Manual (“PAIA Manual”). This PAIA manual provides an outline of the type of records 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.

Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements, except where the Act expressly provides that the information may or must not be released. The Act sets out the relevant procedure to be adopted when requesting information from a public or private body.

Sintrex Integration Services (Pty) Ltd (hereinafter referred to as “**Sintrex**”) are fully committed to the implementation of a PAIA Policy positively and proactively to ensure that information under its control is available and accessible, and thus to give effect to the letter and spirit of the fundamental right of access to information and of the constitutional principles.

3. Contact Details of the Managing Director (Section 51(1)(a))

Managing Director:	Adrienne Kotzè
Registered address:	The Vineyard Office Estate 99 Jip de Jager Bellville 7530
Postal address:	PO Box 6878 Welgemoed 7538
Telephone number:	+27 21 913 9202
Website:	https://www.sintrex.com

4. The Information Officer (Section 51(1)(b))

The Information Officer is responsible to, inter alia, assess requests for access to information.

The Head of private body fulfils such function in terms of Section 51 of the Act. Sintrex has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act.

The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013 (“POPI Act”). The Information Officer oversees the functions and responsibilities as required in terms of both this Act as well as the duties and responsibilities in terms of Section 55 of the POPI Act after registering with the Information Regulator.

The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of Section 17 of the Act as well as Section 56 of the POPI Act.

All requests for information in terms of the Act must be addressed to the Information Officer.

Contact details of the Information Officer	
Information Officer:	Elizabeth Hamman
Physical Address:	The Vineyard Office Estate 99 Jip de Jager Bellville 7530
E-mail:	Elzeth.hamman@sintrex.com

5. Guide of all Manuals in the Republic of South Africa (Section 10)

The South African Human Rights Commission has published the Guide as is prescribed by Section 10 of the Promotion of Access to Information Act. The Guide is available at the offices of the South Africa Human Rights Commission

Any enquiries regarding this Guide should be directed to:

The South Africa Human Rights Commission, at: PAIA Unit (The Research and Documentation Department),

Physical Address:	27 Stiemens Street, Braamfontein
Postal address:	Private Bag X2700, Houghton, 2041.
Telephone:	+27 11 877 3803
Facsimile:	+27 11 403 0625
Website:	www.sahrc.org.za
E-mail:	section51.paia@sahrc.org.za

6. The Latest Notice in Terms of Section 52(2) (If any)

At the time of publication of this PAIA Manual no notice has been published on the categories of records that are automatically available without a person having to request access in terms of the Act.

7. Applicable Legislation

Where applicable to its operations, Sintrex also retains records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act. A request to access information must be done in accordance with the prescriptions of the Act.

No	Act
1.	Basic Conditions of Employment Act No. 75 of 1997
2.	Broad-Based Black Economic Empowerment Act, 2003
3.	Business Act No. 71 of 1991
4.	Companies Act no. 71 of 2008
5.	Compensation of Occupational Injuries and Diseases Act No. 130 of 1993
6.	Competition Act No.98 of 1978
7.	Constitution of the Republic of South Africa 2008
9.	Copyright Act no.98 of 1978
10.	Electronic Communications Act No.36 of 2005
11.	Electronic Communications and Transaction Act No. 25 of 2002
13.	Income Tax Act No. 58 of 1962
14.	Intellectual Property Laws Amendments Act 38 of 1997
15.	Labour Relations Act no.66 of 1995
17.	Occupational Health and Safety Act No.85 of 1993
18.	Promotion of Access to Information Act No. 2 of 2000
19.	Protection of Personal Information Act No. 4 of 2013
20.	Unemployment Contributions Act 63 of 2001
21.	Unemployment Insurance Act No. 30 of 1996
22.	Value Added Tax Act 89 of 1991

8. Automatically Available Information

Information of a public nature, typically those disclosed on the **Sintrex** website and in its various annual reports may be accessed without the need to submit a formal application.

Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such information will still have to be made with the Information Officer.

9. Schedule Of Records (Section 51(1)(D))

Sintrex holds and maintains records on the following categories of information. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a "case by case" basis in accordance with the provisions of the Act.

SUBJECT	DESCRIPTION OF CATEGORIES OF RECORDS
Company Secretarial records	<ul style="list-style-type: none"> • Memorandum of Incorporation * (automatically available from CIPC) • Directors' names *(automatically available from CIPC) • Memorandum and Articles of Association* (automatically available from CIPC) • Company Register • Shareholders Agreements • Share Certificates • Board Meetings: <ul style="list-style-type: none"> ○ Attendance Register ○ Resolutions ○ Minute Books • Delegation of Authorities • General Correspondence • Other Statutory Information
Finance	<ul style="list-style-type: none"> • Financial Statements • Corporate tax records/returns • Other documents related to taxation of the company. • Accounting records <ul style="list-style-type: none"> ○ Journals, Ledgers and Balance Sheets ○ Income Statements ○ Trial Balance Statements ○ Cash Flow Statements • Banking records • Banking statements • Asset register • Invoices • Debtors and Creditors • Credit/Debit Notes • Salary information <ul style="list-style-type: none"> ○ PAYE records ○ IRP5 records • UIF payments • Skills levies • Insurance policies • Auditors' reports • General correspondence
Human Resources	<ul style="list-style-type: none"> • Employee's personal information • Employee contracts • Human Resource policies and procedures • Remuneration Information and Employee Benefits • Employees' Travel Records • Leave records. • Disciplinary and grievance records • Performance evaluations • Training records • Employment Equity Plan and reports • Job profiles • Remuneration • Medical Aid • General correspondence

Customer <i>(Customer refers to any natural or juristic entity that receives services from Sintrex)</i>	<ul style="list-style-type: none"> • Customer details (Identity, addresses, contact, banking, debit orders etc.) • Contact details of individuals representing a corporate customer. • Communications with customers • Transactional information • Debt and debtor information • Customer liaison, complaints, and queries • General correspondence
Marketing	<ul style="list-style-type: none"> • New product development information • Advertising • General Correspondence
Operations	<ul style="list-style-type: none"> • Service orders • Installation and maintenance of products and services- <ul style="list-style-type: none"> ○ Proof of delivery ○ Proof of installation
Information Technology	<ul style="list-style-type: none"> • Hardware • Operating Systems • Telephone Exchange Equipment • Telephone lines, leased lines and data lines. • LAN Installations • Software Packages • Disaster Recovery • Internal Systems Support and Programming / Development • Capacity and Utilisation of Current Systems • Agreements • Licenses • Audits
Legal and regulatory	<ul style="list-style-type: none"> • Contracts/Agreements <ul style="list-style-type: none"> ○ Customer agreements ○ Non-Disclosure agreements ○ Letters of Intent and Memoranda of Understanding ○ Supplier/service provider contracts ○ Independent contractors/agent agreements ○ Lease agreements • Litigation Records • Regulatory <ul style="list-style-type: none"> ○ Electronic Communications Licence ○ Submissions to the Independent Communications Authority of South Africa ○ Administration of Legislation ○ Annual report and licence fees • General correspondence
Corporate Social Responsibility (CSR)	<ul style="list-style-type: none"> • Records and contracts of agreement with funded organisations.
R&D	<ul style="list-style-type: none"> • Information relating to Sintrex's commercial activities; and • Research carried out on behalf of a client by Sintrex or commissioned from a third party for a client. • Research information belonging to Sintrex, whether carried out itself or commissioned from a third party.

10. Protection Of Personal Information That Is Processed By Sintrex

Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated unless specific exclusions apply as outlined in POPIA.

Sintrex needs Personal Information relating to both individual and juristic persons to carry out its business and organisational functions. The way this information is processed and the purpose for which it is processed is determined by Sintrex. Sintrex is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- is processed lawfully, fairly, and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by Sintrex, in the form of privacy or data collection notices. Sintrex must also have a legal basis (for example, consent) to process Personal Information.
- is processed only for the purposes for which it was collected.
- will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- is adequate, relevant, and not excessive for the purposes for which it was collected.
- is accurate and kept up to date.
- will not be kept for longer than necessary.
- is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, is subject to an appropriate level of security when stored, used, and communicated by Sintrex, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage.
- is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - be notified that their Personal Information is being collected by Sintrex. The Data Subject also has the right to be notified in the event of a data breach.
 - know whether Sintrex holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual.
 - request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained personal information.
 - object to Sintrex's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to Sintrex's record-keeping requirements).
 - object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications.

11. Third-Party Disclosures

Sintrex might, in the ordinary course of business, have to disclose personal information of Sintrex Customers to third parties, such as Contractors, Service providers and Software developers, Agents, and other licensed electronic communications operators (who are also responsible parties as defined in the legislation) etc.

Sintrex commits to only disclose personal information to third parties where it is necessary to ensure continued quality provisioning of its products and services to its customers.

Sintrex shall also contractually ensure that such third parties undertake to deploy and manage adequate safeguards pertinent to the lawful processing and protection of such personal information.

12. Cross-Border Transfers

Sintrex does not generally do cross border information transfers.

However, in the unlikely event that cross border transfer of personal information is necessary and/or unavoidable, Sintrex shall ensure that the data protection and privacy laws of such countries to which personal information is transferred are like the legislation in South Africa and that the recipients of the personal information commit to the same standard of data protection as that which Sintrex has committed to.

13. Safeguarding

Personal information of data subjects in Sintrex's possession is safeguarded against unauthorised access and use, disclosure, alteration, damage and/or loss, by the deployment of reasonably practicable organisational and technological safeguards. Sintrex also takes reasonable steps to ensure the integrity, accuracy and updating of personal information held by it. Sintrex has implemented adequate encryption, access controls and other best practices to protect personal data.

We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information is secure.

14. Procedure For Requesting Access to Information (Section 51(1)(E))

In terms of POPIA, a data subject may make a request to Sintrex for access to or updating of personal information that Sintrex holds.

The right to access personal information also includes the right to object to or request the limitation of the processing of personal information on specific grounds.

Requests for access to records held by Sintrex must be made on the prescribed form that is attached as Annexure A hereto. The prescribed form is available at https://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf

- Note that requests will only be processed upon payment of the prescribed fees.
- The standard form that must be used for the making of requests. Not using this form could cause your request to be refused (if you do not provide sufficient information or otherwise) or delayed.

Requests for access to records must be made to our Information Officer at the address or electronic mail address provided for in clause 4 above.

Provide sufficient details to enable Sintrex to identify:

- The record(s) requested.
- The requester (and if an agent is lodging the request, proof of capacity).
- The form of access required.
- The postal address or electronic email of the requester in the Republic of South Africa.
- If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
- The requester must specify the right which he/she is seeking to exercise or protect. The requester must provide a reason for the requested record to exercise or protect the right.

Kindly note that all requests to Sintrex will be evaluated and considered in accordance with the Act. Publication of this manual and describing the categories and subject matter of information held by Sintrex does not give rise to any rights (in contract or otherwise) to access such information or records except in terms of the Act.

15. Turn Around Times for Attending to Requests

Sintrex will within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

The 30 (thirty) days' period within which Sintrex must decide whether to grant or refuse the request for a further period of not more than 30 (thirty) days if the request is for many information, or the request requires a search for information and the information cannot reasonably be obtained within the original 30 (thirty) day period.

Sintrex will notify the requester in writing should an extension be sought.

16. Prescribed Fees (Section 51(1)(F))

There are two types of fees to be paid in terms of the Act, namely:

- The request fee, and
- The access fees.

Refer to Annexure B attached hereto for the prescribed fee schedule.

A requester who seeks access to a record containing their personal information (a "personal requester") is not required to pay the request fee.

A requester is required to pay the prescribed fees before a request will be processed.

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).

A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit.

Records may be withheld until the fees have been paid. The fee structure is available on the website of the South Africa Human Rights Commission at www.sahrc.org.za.

17. Payment Of Fees

The initial request fee must be deposited into the bank account below and a copy of the deposit slip, application form and other correspondence/documents must be forwarded to the Information Officer via e-mail.

All fees must be deposited into the following bank account.

Banking Institution:	Nedbank Limited
Account Name:	Sintrex Integration Services (Pty) Ltd
Account Number:	1164873695

Branch Code:	198765
Reference:	Requesters Name

All fees are subject to change as allowed for in the Act and consequently, such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any changes in the fees prior to making a payment.

18. Availability and updating of PAIA Manual

Sintrex will update this manual at such intervals as may be deemed necessary. This manual of Sintrex can be viewed on its website www.sintrex.com.

19. Approval of this PAIA Manual

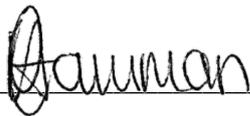
This PAIA Manual of Sintrex is approved and signed by the Managing Director and Information Officer of Sintrex, on this 17th day of June 2021.



Approved by Adrienne Kotzè
(Managing Director)

29 June 2021

Date



Approved by Elizabeth Hamman
(Information Officer)

29 June 2021

Date

Contact Information

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