

**PLP GROUP PROPRIETARY LIMITED**

REGISTRATION NUMBER : 1992/006568/07

& its Subsidiaries

PLP Namibia: 2010/0325

PLP Indian Ocean:192434

PLP Africa Pty Ltd: 2011/00743/07

PLP SA Pty Ltd: 2016/114127/07

STRATITUDE Pty Ltd: 2007/105791/07

REWARDEDCO Pty Ltd: 2004/012951/07

NEXT ENGAGE Pty Ltd: 2002/002780/07

TCT DIGITAL Pty Ltd: 2016/190054/07

INZONE TECH Pty Ltd: 2007/010461/07

# **PAIA MANUAL**

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

**DATE OF COMPILATION: 14 August 2023**

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## **1. LIST OF ACRONYMS AND ABBREVIATIONS**

- |     |                    |   |
|-----|--------------------|---|
| 1.1 | <b>“CEO”</b>       | Chief Executive Officer   |
| 1.2 | <b>“DIO”</b>       | Deputy Information Officer;                                       |
| 1.3 | <b>“IO”</b>        | Information Officer;  |
| 1.4 | <b>“Minister”</b>  | Minister of Justice and Correctional Services;                    |
| 1.5 | <b>“PAIA”</b>      | Promotion of Access to Information Act No. 2 of 2000( as Amended; |
| 1.6 | <b>“POPIA”</b>     | Protection of Personal Information Act No.4 of 2013;              |
| 1.7 | <b>“Regulator”</b> | Information Regulator; and  |
| 1.8 | <b>“Republic”</b>  | 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 THE**

#### **3.1. Chief Information Officer/ Information Officer**

Name: Jabulani Khumalo  
Tel: +27 11 4497300  
Email: pjkhumalo@plp.co.za

#### **3.3 Access to information general contacts**

Email: legal@plp.co.za

### **3.4 National or Head Office**

Postal Address: P.O Box 2629  
Randburg  
2124

Registered Address: 15 York street  
Kensington B  
Randburg  
2194

Telephone: +2711 4497300

Email: legal@plp.co.za

Website: <https://www.plp.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 English.

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<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 4.3.3. the manner and form of a request for-
  - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-
  - 4.3.6.1. an internal appeal;
  - 4.3.6.2. a complaint to the Regulator; and
  - 4.3.6.3. 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;

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<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<sup>3</sup> Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

<sup>4</sup> Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
  - 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
  - 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
  - 4.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
- 4.5.1. upon request to the Information Officer;
  - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

## **5. CATEGORIES OF RECORDS OF PLP GROUP PROPRIETARY LIMITED & ITS SUBSIDIARIES AS DESCRIBED IN THE COVER PAGE WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

- 5.1 Information of a public nature, typically those disclosed on the PLP Group website and or its Subsidiaries as the case may be and its various reports may be accessed without the need to submit a formal application.
- 5.2 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.

## **6. APPLICABLE LEGISLATION**

Where applicable to its operations, PLP Group and or its subsidiaries as the case may be 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.

<b>Number</b>	<b>Applicable Legislation South Africa</b>
1	Basic Conditions of Employment Act No. 75 of 1997
2	Companies Act no. 71 of 2008
3	Compensation of Occupational Injuries and Diseases Act No. 130 of 1993
4	Copyright Act no.98 of 1978
5	Electronic Communications Act No.36 of 2005
6	Income Tax Act No. 58 of 1962
7	Intellectual Property Laws Amendments Act 38 of 1997
8	Labour Relations Act no.66 of 1995
9	Promotion of Access to Information Act No. 2 of 2000
10	Protection of Personal Information Act No. 4 of 2013



Number	Applicable Legislation - Namibia
1	Namibian Labour Act, Act 6 of 1992
2	Companies Act of 2004
3	Income Tax Act , 1981
4	Industrial Property Act 2012
5	Rights of Information Act , Act 8 of 2022
Number	Applicable Legislation – Mauritius
1	Data Protection Act 2017
2	Companies Act 2001
3	Employment Rights Act 2008
4	Copyright Act 2014

**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE PLP GROUP PROPRIETARY LIMITED & ITS SUBSIDIARIES AS LISTED ON THE COVER PAGE**

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none"> <li>- Employee's personal information</li> <li>- Employee contracts</li> <li>- Human Resource policies and procedures</li> <li>- Remuneration Information and Employee Benefits</li> <li>- Employees' Travel Records</li> <li>- Leave records</li> </ul>

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> <li>- Disciplinary and grievance records</li> <li>- Performance evaluations</li> <li>- Training records</li> <li>- Employment Equity Plan and reports</li> <li>- Job profiles</li> <li>- Remuneration</li> <li>- Medical Aid</li> <li>- Job competency profiles</li> <li>- General correspondence</li> </ul>
Companies Act Records	<ul style="list-style-type: none"> <li>- Memorandum of Incorporation * (automatically available from CIPC)</li> <li>- Directors' names *(automatically available from CIPC)</li> <li>- Company Register</li> <li>- Shareholders Agreements</li> <li>- Share Certificates</li> <li>- Board Meetings:</li> <li>- Attendance Register</li> <li>- Resolutions</li> <li>- Minute Books</li> <li>- Delegation of Authorities</li> <li>- General Correspondence</li> <li>- Other Statutory Information</li> </ul>
Financial Records	<ul style="list-style-type: none"> <li>- Financial Statements</li> <li>- Corporate tax records/returns</li> <li>- Other documents related to taxation of the company</li> <li>- Accounting records</li> <li>- Journals, Ledgers, and Balance Sheets</li> <li>- Income Statements</li> <li>- Trial Balance Statements</li> <li>- Cash Flow Statements</li> </ul>

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> <li>- Banking records</li> <li>- Banking statements</li> <li>- Asset register</li> <li>- Invoices</li> <li>- Debtors and Creditors</li> <li>- Credit/Debit Notes</li> <li>- Salary information</li> <li>- PAYE records</li> <li>- IRP5 records</li> <li>- UIF payments</li> <li>- Skills levies</li> <li>- Insurance policies</li> <li>- Auditors reports</li> <li>- General correspondence</li> </ul>
Customer	<ul style="list-style-type: none"> <li>- Customer details (Identity, addresses, contact, banking, debit orders etc.)</li> <li>- Contact details of individuals representing a corporate customer s</li> <li>- Communications with customers</li> <li>- Transactional information</li> <li>- Market intelligence information</li> <li>- Customer liaison, complaints, and queries</li> <li>- General correspondence</li> </ul>
Marketing	<ul style="list-style-type: none"> <li>- New product development information</li> <li>- Advertising</li> <li>- General Correspondence</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>- Network architecture Information</li> <li>- IT Policies and Procedures</li> <li>- Network Diagrams</li> <li>- User Manuals</li> <li>- Network Quality information</li> <li>- Data Management System information</li> </ul>

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> <li>- System security</li> </ul>
Legal and regulatory	<ul style="list-style-type: none"> <li>- Contracts/Agreements</li> <li>- Customer agreements</li> <li>- Non-Disclosure agreements</li> <li>- Letters of Intent and Memoranda of Understanding</li> <li>- Supplier/service provider contracts</li> <li>- Independent contractors/agent agreements</li> <li>- Lease agreements</li> <li>- Litigation Records</li> <li>- Regulatory</li> <li>- Administration of Legislation</li> <li>- General correspondence</li> </ul>

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

8.1.1 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.

8.1.2 PLP Group and or its Subsidiaries as the case may be needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by PLP Group and or its Subsidiaries as the case may be . PLP Group and or its Subsidiaries as the case may be is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

8.1.2.1 is processed lawfully, fairly, and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by PLP Group and or its Subsidiaries as the case may be , in the form of privacy or data collection notices. PLP Group and or its Subsidiaries as the case may be must also have a legal basis (for example, consent) to process Personal Information;

8.1.2.2 is processed only for the purposes for which it was collected;

8.1.2.3 will not be processed for a secondary purpose unless that processing is compatible with the original purpose;

8.1.2.4 is adequate, relevant, and not excessive for the purposes for which it was collected;

8.1.2.5 is accurate and kept up to date;

8.1.2.6 will not be kept for longer than necessary;

8.1.2.7 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, are subject to an appropriate level of security when stored, used, and communicated by PLP Group and or its Subsidiaries as the case may be , in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;

8.1.2.8 is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:

- a) be notified that their Personal Information is being collected by PLP Group and or its Subsidiaries as the case may be . The Data Subject also has the right to be notified in the event of a data breach;

- b) know whether PLP Group and or its Subsidiaries as the case may be 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;
- c) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained personal information;
- d) object to PLP Group and or its Subsidiaries as the case may be use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to PLP Group and or its Subsidiaries as the case may be record keeping requirements);
- e) object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications.

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender, and race

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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

#### **8.4 Planned transborder flows of personal information**

In the event that cross border transfer of personal information is necessary and/or unavoidable, PLP Group and or its Subsidiaries as the case may be shall ensure that the data protection and privacy laws of such countries to which personal information is transferred, are similar to the legislation in South Africa and that the recipients of the personal information commit to the same standard of data protection as that which PLP Group and or its Subsidiaries as the case may be has committed to.

#### **8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information**

8.5.1 Personal information of data subjects in PLP Group and or its Subsidiaries as the case may be possession is safeguarded against unauthorised access and use, disclosure, alteration, damage and/or loss, by the deployment of reasonably practicable organisational and technological safeguards. PLP Group and or its Subsidiaries as the case may be also take reasonable steps to ensure the integrity, accuracy and updating of personal information held by it. PLP Group and or its Subsidiaries as the case may be has implemented adequate encryption, access controls and other best practices to protect personal data.

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

## **9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

9.1.1 on <https://plp.co.za> if any;

9.1.2 at the head office of the PLP GROUP PROPRIETARY LIMITED for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

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

## **10. UPDATING OF THE MANUAL**

The Chief Information Officer or head of PLP GROUP PROPRIETARY LIMITED will on a regular basis update this manual.

### **Issued by**

**Mr. Jabulani Khumalo**  
**Chief Information Officer**