



# PAIA Manual

Of

# Keep It Together Manufacturers (Pty) Ltd

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, No 2 of 2000 (the "PAIA") and the Protection of Personal Information Act, No 4 of 2013 ("POPIA")

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## 1. Introduction

The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability in South Africa. This manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 (POPIA). POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. This Manual provides and outlines the type of records held by Keep It Together Manufacturers (Pty) Ltd and explains how requestors may submit requests to these records in terms of PAIA. It further allows requestors to access, object to and request a correction of personal information in terms of sections 23 and 24 of POPIA.

### Nature of Business

Keep It Together Manufacturers (Pty) Ltd are Manufacturers and Distributors of Foam Inserts/wadding, Silica gel for the Pharmaceutical Industry, Baby Accessories and Pet beds.

## 2. Contact Details

The responsibility for administration of and compliance with PAIA and POPIA, has been delegated by the Chief Executive Officer of the Company to the Information Officer of the Company.

Name of Company: Keep It Together Manufacturers (Pty) Ltd  
Chief Executive Officer: Leon Jacobs  
Information Officer: Elise English  
Physical Address: 18 Cypress Drive, Glen Anil, Durban 4000  
Postal Address: P.O. Box 20593, Durban North, 4016  
Telephone Number: +27 861 654 654  
Email address: [elise@kitsa.co.za](mailto:elise@kitsa.co.za)  
Website: [www.kitsa.co.za](http://www.kitsa.co.za)

## 3. South African Human Rights Commission Guide Details

A guide to the Act (as contemplated under section 10 of the Act) 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 the Act. Any enquiries regarding this guide and its contents should be directed to:

The South African Human Rights Commission: PAIA Unit  
Postal address: Private Bag 2700, Houghton, 2041  
Telephone: +27 11 877 3600  
Fax: +27 11 484-7146  
Website: [www.sahrc.org.za](http://www.sahrc.org.za)

## 4. Applicable Legislation

Records of the Company that may be kept in accordance with the following legislation.

Basic Conditions of Employment Act 75 of 1997  
Broad-based Black Economic Empowerment Act 53 of 2003  
Companies Act 71 of 2008  
Compensation for Occupational Injuries and Diseases Act 130 of 1993  
Consumer Protection Act 68 of 2000  
Currencies and Exchanges Act 9 of 1993

Electronic Communications and Transactions Act 25 of 2002  
 Employment Equity Act 55 of 1998  
 Income Tax Act 58 of 1967  
 Labour Relations Act 66 of 1995  
 Occupational Health and Safety Act 85 of 1993  
 Promotion of Access to Information Act 2 of 2000  
 Protection of Personal Information Act, 4 of 2013  
 Protected Disclosures Act 26 of 2000  
 Skills Development Act 97 of 1998  
 Skills Development Levy Act 9 of 1999  
 Unemployment Insurance Act 63 of 2001  
 Unemployment Insurance Contributions Act 4 of 2002  
 Value Added Tax Act 89 of 1991

### 5. Records available without request

We do not have any category of records which are automatically available.

### 6. Category of Records held by the Company on request

The list below depicts records of information held by the company. Access thereto may be restricted to protect the privacy and private information of the Data Subject. These records may be available on request.

<b>Companies Act Records</b>	<b>Financial Records</b>
Company Incorporation Names of Directors Minutes of Board Meetings Records relating to the appointment of Directors.	Financial Statements Documents relating to taxation of the Company Accounting Records Financial Agreements Credit Agreements Banking Records Rental Agreements Invoices PAYE/UIF/SDL Records VAT Workmen's Compensation Insurances Internal Audit Records
<b>Sales</b>	<b>Supplier Information</b>
Customer Agreements Customer Details Contact details of individuals within Customers Communications with Customers Pricing information Sales Forecast Sales/Marketing procedure Design & Development	Supplier Details Contact details of individuals within the Supplier Company. Communication with Suppliers Purchasing Records
<b>Human Resources</b>	<b>Health Safety &amp; Quality</b>

Personal Information of Employees Employee Contracts of Employment Salaries of Employees Provident Fund Records Leave Records Disciplinary Records Disciplinary Code New Job Applications CCTV Recordings Access Control Records Training Records Policies	Health & Safety Records Health and Safety Policy Health & Safety Minutes of Meetings Incident Records Quality Records
<b>Information Technology</b>	
Licence Agreement	

## 7. Processing of Personal Information in Terms Of POPIA

The Company takes privacy and the protection of personal information seriously and will only process personal information in accordance with POPIA.

### Purpose of Processing

The Company processes Personal Information, which includes but is not limited to:

- Rendering of services to our customers
- Conducting credit reference checks
- Employee administration
- Providing or managing any information on products
- Transacting with our suppliers
- Maintaining customer records
- Recruitment purposes
- General administration
- Financial and tax purposes
- Legal and statutory purposes
- Health and safety purposes
- Managing the premises and facilities

## 8. Categories of Data Subjects and their Personal Information

The company may possess records relating to suppliers, employees, and customers:

Data Subject	Information processed
Customers	Entity name, contact person's name and contact number, vat number, Company registration number, physical and postal address, financial information
Suppliers/ Service Providers	Entity name, contact details for representative persons, BBB-EE certificates

Employees	ID number, contact details, physical and postal address, date of birth, age, marital status, race, disability information, employment history, fingerprints, CVs, education history, banking details, income tax reference number, remuneration and benefit information (provident fund information), details related to employee performance, employee contracts, employee performance records, payroll records, electronic access records, physical access records, CCTV records, health and safety records, training records, employment history
New Job Application	Name, surname, address, contact details, email address, telephone number, details of qualifications, skills, experience and employment history, information about current level of remuneration, including benefit entitlements.

## 9. Access to Records Held by The Company

Records held by the Company may be accessed on request only once the requirements for access have been met. A requester is any person making a request for access to a record of the Company and in this regard, the Act distinguishes between two types of requesters:

### Personal Requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester. Subject to the provisions of the Act and applicable law, the Company may provide the requested information, or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged by the Company.

### Other Requester

This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, the Company is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act. The prescribed fee for reproduction of the information requested will be charged by the Company.

### Request Procedure

A requester must comply with all the procedural requirements contained in the Act relating to a request for access to a record. A requester must complete the prescribed form: [See annexure A – Information access form.](#)

The requester must submit the form as well as payment of a request fee and a deposit, if applicable, to the information officer at the postal or physical address, or electronic mail address stated herein. The prescribed form must be filled in with enough particularity to at least enable the information officer to identify:

The record or records requested;

The identity of the requester;

What form of access is required; and

The postal address, electronic mail or fax number of the requester.

A requester must state that he or she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is to be exercised or protected. The requester must also provide an explanation of why the requested record is required for the exercise or protection of that right. The

Company will process a request within 30 (thirty) days, unless the requestor has stated special reasons which would satisfy the Information Officer that circumstances dictate that this time period not be complied with.

The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the manner and the particulars so required.

If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.

The Company will, within 30 (thirty) days of receipt of a request, decide whether to grant or decline a request and give notice with reasons (if required) to that effect. The 30 (thirty) day period within which the Company has to decide whether to grant or refuse a request, may be extended for a further period of not more than 30 (thirty) days if the request is for a large quantity of information, or the request requires a search, and the information cannot reasonably be obtained within the original 30 (thirty) day period. The Information Officer will notify the requester in writing should an extension be necessary.

If records cannot be found or do not exist, the Information Officer will notify the requester by way of an affidavit or affirmation that it is not possible to give access to the requested record.

## **10. Grounds for refusal**

The Information Officer may refuse a request for information for the following reasons:

- a) Where the disclosure would amount to an unreasonable disclosure of personal information.
- b) Where the disclosure would amount to disclosure of the trade secrets of a third party.
- c) Where the disclosure would lead to a revelation of financial, commercial, scientific or technical information of a third party.
- d) Where such information was supplied in confidence by a third party.
- e) Where the disclosure would breach the duty of confidence owed to a third party.
- f) Where the disclosure would endanger the life or physical safety of an individual.
- g) If the disclosure is prohibited under the Criminal Procedure Act.
- h) If the disclosure is privileged under legal proceedings or research conducted by or on behalf of a third party; and
- i) Where the disclosure would compromise the investigation where proceedings are pending.
- j) The commercial activities of the Keep It Together Manufacturers, which may include:
  - Trade secrets.
  - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests.
  - Information which, if disclosed could put Keep It Together Manufacturers at a disadvantage in negotiations or commercial competition.

## **11. Remedies Available If Request for Information Is Refused**

### **Internal Remedies**

The Company does not have internal appeal procedures. As such, the decision made by the Information Officer pertaining to a request is final, and requestors will have to exercise such external remedies at their disposal if a request is refused, and the requestor is not satisfied with the response provided by the information officer.

### **External Remedies**

A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a court for relief. Likewise, a third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a court for relief. For purposes of the Act, courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.

## **12. Fees**

The Act provides for two types of fees:

A request fee, (which will be a standard fee) and an access fee, which must be calculated by taking into account reproduction costs, search and preparation time and cost, as well as postal costs where applicable. When a request is received by the Information Officer of the Company, the Information Officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee (if any) before further processing of the request. If a search for the record is necessary and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted – [See Annexure B - Fee for records of Private Body](#)

The Information Officer shall withhold a record until the requester has paid the fee or fees as indicated. A requester whose request for access to a record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form. If a deposit has been paid in respect of a request for access, which is refused, then the information officer shall repay the deposit to the requester.

## **13. Transborder flow of personal information**

The Company may from time to time share personal information with another country for the purposes of rendering services to customers. The Company will take the necessary steps to ensure that third-party operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.

## **14. The Company's security measures to protect personal information.**

The Company takes the security of your data seriously and therefore reasonable technical and organisational measures have been implemented to protect personal information. The Company has

internal policies and controls in place to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. The Company will take steps to ensure that third party providers who process personal information on behalf of the Company apply adequate safeguards as required in terms POPIA.

#### **15. Retention of Records**

The Company will retain personal records to the extent permitted or required by law.

#### **16. Objection to the Processing of Personal Information by a Data Subject**

Subject Section 11 (3) of POPI and regulation 2 of the POPI Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual. [See Annexure C - Objection to the Processing of Personal Information Form](#)

#### **17. Request for Correction or Deletion of Personal Information**

Section 24 of POPI and regulation 3 of the POPI Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached to this manual. [See Annexure D - Request for Amendment, Correction or Deletion of Personal Data Form](#)

#### **18. Availability of The Manual**

The manual is available for inspection, on reasonable prior notice, at the office of the Company free of charge. Copies of the Company's manual can be obtained from the Company and is available on the Company's website.



**ANNEXURE A**

**Information Access Request Form  
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY  
Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)  
[Regulation 10]**

**A. Particulars of private body**

The Head:

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**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: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Fax No. \_\_\_\_\_

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

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

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**C. Particulars of person on whose behalf request is made**

*This section must be completed ONLY if a request for information is made on behalf of another person.*

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

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

**D. Particulars of record**

- (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:

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2. Reference number, if available:

**ANNEXURE A**

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.

1. Reason for exemption from payment of fees:

**F. Form of access to record**

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

*Disability: Form in which record is required*  
 Mark the appropriate box with an X.  
 NOTES:  
 (a) Compliance with your request in the specified form may depend on the form in which the record is available.  
 (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.  
 (c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.

<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 (this includes photographs, slides, video recordings, computer generated images, sketches, etc):</b>			
View 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>			

**ANNEXURE A**

Printed copy of record*		Printed copy of information derived from the record*		Copy in computer readable form *(Compact Disk)	
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*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:

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

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**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?

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

\_\_\_\_\_  
SIGNATURE OF REQUESTER /  
PERSON ON WHOE BEHALF REQUEST IS MADE

**ANNEXURE A**

**ANNEXURE B**

**FEES FOR RECORDS OF PRIVATE BODY**

- 1) The “request fee” payable upfront by a requester, other than a personal requester, referred to in section 54(1) of the Act, is R50.00.
- 2) The “fees for reproduction” referred to in section 52(3) and “access fees” payable by a requester referred to in section 54(7), unless exempted under section 54(8) of the Act, are as follows:

a)	For every photocopy of an A4-size page or part thereof	R 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	R 0.75
c)	For a copy of a readable form on a compact disc	R70.00
d)	For a transcription of visual images, for an A4-size page or part thereof.	R40.00
e)	for a copy of visual images	R60.00
f)	for a copy of an audio record	R20.00
g)	To search for and prepare the record for disclosure, for each hour or part on an hour.	R30.00 per hour

The actual postal fee is payable when a copy of a record must be posted to a requester.

Exemptions from paying “access fees” Person or persons exempted from paying access fees: (i) A single person whose annual income does not exceed R14,712.00; or (ii) Married persons or a person and his/her life partner whose annual income does not exceed R27,192.00



**ANNEXURE A**

**ANNEXURE C**

**Object to the processing of personal information form**

***Objection To the Processing of Personal Information in Terms of Section 11(3) Of the Protection of Personal Information Act***

- a) *Please note: Affidavits or other documents evidence in support of the objection needs to be attached to this form.  
(If more space is required add additional pages as an appendix to this form)*

<b>Details of Data Subject</b>	
Name and Surname	
Address	
Phone Number	
Fax Number	
e-mail address	
<b>Details of Responsible Party</b>	
Name and Surname of the Responsible person, Public or Private Body	
Address	
Phone Number	
Fax Number	
e-mail address	
<b>Reason for Objection (Please provide Full Details)</b>	

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

Signature of Application (Data Subject) \_\_\_\_\_

**ANNEXURE D**

**Request for Amendment, Correction or Deletion of Personal Data Form**

*Section 24 of the POPIA provides that a Data Subject may request a responsible party to correct or delete personal information about the data subject.*

<b>Details of The Person Requesting Amendment, Correction or Deletion</b>	
Full Name	
Address	
Date of Birth	
e-mail address	
<b>Your Role</b>	
<input type="checkbox"/>	I am the data subject.
<input type="checkbox"/>	I am not the data subject, though I am acting on behalf of the data subject by virtue of a power of attorney
<b>Proof of Identity and Authority Submitted</b>	
<input type="checkbox"/>	Passport
<input type="checkbox"/>	Identity Document
<input type="checkbox"/>	Power of Attorney
<b>Amendment</b>	
<input type="checkbox"/>	I wish to amend my personal data.
<input type="checkbox"/>	I wish to amend personal data concerning a data subject that I am acting on behalf of.
Type of personal data you wish to amend	
Describe the amendment	
<b>Correction</b>	
<input type="checkbox"/>	I wish to correct my personal data.
<input type="checkbox"/>	I wish to correct personal data concerning a data subject that I am acting on behalf of.
Type of data you wish to correct	

Describe the correction	
<b>Deletion</b>	
<input type="checkbox"/>	I wish to delete my personal data.
<input type="checkbox"/>	I wish to delete personal data concerning a data subject that I am acting on behalf of.
Describe the type of personal data you wish to delete	

*By signing this form, you certify that the information you have provided is correct to the best of your knowledge and you are the person to whom it relates to or that you are legally entitled to act on behalf of such person. You understand that it may be necessary to obtain further information in order to comply with this request.*

Signature: \_\_\_\_\_

Date: \_\_\_\_\_