

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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Access to Information Manual

As required by Section 51 of the Promotion to Access of Information Act No. 2 of 2000 ("PAIA")

Eerste Flambeau Huur (Pty) Ltd

("EFH ")

1. List of acronyms and abbreviations

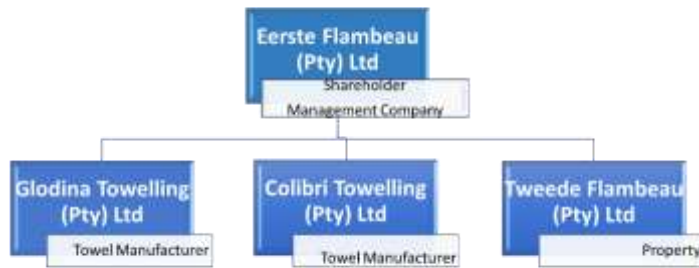
1.1	"CEO"	Chief Executive Officer
1.2	"DIO"	Deputy Information Officer
1.3	"IO"	Information Officer
1.4	"PAIA"	Promotion of Access to Information Act No. 2 of 2000 (as Amended)
1.5	"POPIA"	Protection of Personal Information Act No.4 of 2013
1.6	"Regulator"	Information Regulator; and
1.7	"Republic"	Republic of South Africa

2. Introduction

This manual is compiled in terms of the Promotion of Access to Information Act, No 2 of 2000 ("the Act"). The Act gives effect to the constitutional right of access to information contained in section 32 of the Constitution of the Republic of South Africa.

In terms of the Act, private bodies are required to compile a manual as a guide to requesters of information. This manual further serves to indicate the kind of records held by EFH and its Subsidiaries and the availability of such records from EFH, as a private body.

3. EFH Subsidiaries



4. EFH Management Structure

EFH is managed by a dynamic team:

- Chief Executive Officer
- Chief Financial Officer
- Chief Operations Officer
- Group HR Manager
- Executive: Sales and Marketing

5. 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.

6. Key Contact details for access to information of EFH and Subsidiaries

6.1. Chief Information Officer

Name: Dave D Govender
Tel: 031 763 7600
Email: glodina@glodina.co.za

6.2. Deputy Information Officer

Name: Andrew Broughton
Tel: 031 763 7600
Email: glodina@glodina.co.za

6.3. Access to information general contacts

Email: glodina@glodina.co.za

6.4. National or Head Office

Postal Address: 1 Anderson Road, Hammarsdale
KwaZulu Natal, South Africa 3700

Physical Address: 1 Anderson Road, Hammarsdale
KwaZulu Natal, South Africa 3700

Telephone: 031 736 7600
Email: glodina@glodina.co.za
Website: www.glodina.co.za

7. Guide on how to use PIAA and how to obtain access to the guide

- 7.1. 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.
- 7.2. The Guide is available in English as a business language.
- 7.3. The aforesaid Guide contains the description of-
 - 7.3.1. the objects of PAIA and POPIA;
 - 7.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 7.3.2.1. the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 7.3.3. the manner and form of a request for-
 - 7.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 7.3.3.2. access to a record of a private body contemplated in section 50⁴;
 - 7.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 7.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 7.3.6. 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-
 - 7.3.6.1. an internal appeal;
 - 7.3.6.2. a complaint to the Regulator; and
 - 7.3.6.3. 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;

¹ 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.*

² 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.*

³ 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.*

⁴ 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.*

- 7.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 7.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 7.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 7.3.10. the regulations made in terms of section 92¹¹.
- 7.4. 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.
- 7.5. The Guide can also be obtained-
 - 7.5.1. upon request to the Information Officer;
 - 7.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6 A copy of the Guide is also available in the for public inspection during normal office hours-

8. Records available in terms of other legislation: Section 51(1)(d)

Records available in terms of other legislation are as follows:

- Labour Relations Act 66 of 1995
- Employment Equity Act 55 of 1998
- Basic Conditions of Employment Act 75 of 1997
- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Companies Act 61 of 1973
- Unemployment Insurance Act 63 of 2001

⁵ 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.

⁶ 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.

⁷ 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

⁸ 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

⁹ 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.

¹⁰ 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.

¹¹ 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.”

- Value Added Tax Act 89 of 1991
- Income Tax Act 58 of 1962 P
- Skills Development Act 9 of 1999

9. Categories of records of the Organisation which are available with / without request

Category of records	Types of Record	Available on Website	Available on request
Compliance	Terms of use for the website	X	
Compliance	Privacy policy for the website	X	
Compliance	SARS tax clearance certificate		X
Compliance	BBBEE certificate		X
Compliance	Company registration document (CIPC)		X
Compliance	VAT registration		X
Compliance	Company profile		X
Compliance	Public product Information		X
Compliance	Newsletters		X

10. Categories of records of EFH which are available in accordance with legislation

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
PAIA Guides (issued by Regulator and available on request)	Promotion of Access to Information Act 2 of 2000

11. Subjects and categories of subjects on which EFH holds records

Section 51(1)(e)

Records held by EFH and its subsidiaries are generated through the administration of its core functions and processes. These records include strategic records and those of various support functions within EFH and its subsidiaries.

The functions and categories of records held by EFH and its subsidiaries are listed and classified below according to the respective EFH divisions.

Subjects on which the body holds records	Categories of records
Compliance	- Policies and procedures - Minutes of board of directors meetings - Register of board of directors - Health and safety plan - Personal Information impact assessment - Covid register
Human Resources	- HR policies and procedures - Advertised posts

Subjects on which the body holds records	Categories of records
	- Employment contracts - Employees records (including Special Personal Information) - Employment equity plan - Medical aid records - Pension fund records - Performance management records - Employee benefit records - Payroll records (including PAYE) - SARS records (e.g. IRP5's) - UIF records - Training attendance register - Disciplinary and grievance records
Financial Record	- Finance policies - Annual budgets - Variance reports (budget vs actual) - Financial statements - Monthly management accounts - VAT schedules - SARS tax clearance - Monthly journals - Annual journals - Cash book - General ledger - Financial reconciliations - Debtors including invoices, statement and credit notes - Creditors, including invoices, statements, credit notes, BBBEE certificates, BBBEE affidavits, SARS tax clearance and asset register - Banking records and statements - Electronic banking records - Insurance policies
Technology	- Information security policies - Register of hardware - Register of software - Record of access to systems
Sales and Marketing	- Marketing strategy - List of clients and prospects - CRM system with details of clients - Client agreements - Client files - Client correspondence - Sales records
Operations	- Rental agreements

Subjects on which the body holds records	Categories of records
	- Credit Bureau records - Non-disclosure agreements - Supplier agreements - Distributor Agreements - Internal correspondence (emails / memos)

12. Processing of Personal Information

12.1. Purpose of Processing Personal Information

The purposes for which we process personal information includes but not limited to:

- 12.1.1. rendering of services to our customers;
- 12.1.2. employee administration;
- 12.1.3. transacting with our suppliers and third-party service providers;
- 12.1.4. maintaining records;
- 12.1.5. recruitment;
- 12.1.6. general administration;
- 12.1.7. financial requirements;
- 12.1.8. compliance with legal and regulatory requirements; and
- 12.1.9. facilities management

12.2. Categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed	Purpose
Customers / Clients (including debtors)	Name, ID number, date of birth, email address, physical address, postal address, contact number, company registration number, BBBEE rating, financial data	To service our clients and to invoice them for the products sold or services rendered
Service providers (including suppliers/ vendors/ creditors)	Name, registration number, VAT number, physical address, email address, postal address, contact number, company registration information, BBBEE status documents, SARS tax clearance, bank details, financial data	To engage and pay service providers for products received or services that they have performed
Employees and contractors	Name and surname, ID number, passport, date of birth, marital	To employ staff and contractors; to maintain

Categories of Data Subjects	Personal Information that may be processed	Purpose
	status, next of kin and family details, email address, physical address, postal address, education and qualifications, gender and race, contact numbers, bank details, salary / remuneration amount, tax details and criminal record checks	employee records; to pay the employees and contractors; to comply with the necessary legislation and with company policies and procedures

12.3. 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

12.4. Planned transborder flows of personal information

EFH will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only in accordance with the provisions of POPIA.

EFH will take steps to ensure that 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 the POPIA.

We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in POPIA.

12.5. Information Security Measures to be implemented by the EFH to ensure the confidentiality, integrity and availability of the information

EFH is committed to protecting the integrity and confidentiality of Personal Information in its possession or under its control and has taken ***appropriate technical and organisational measures*** to prevent, loss of, damage to or unauthorised destruction of Personal Information and unlawful access to or processing of Personal Information

12.5.1. Organisational Measures

- EFH has created and implemented various policies, procedures, and guidelines to protect Personal Information in its possession.
- Where third parties are required to process any Personal Information in relation to the purposes set out in this Manual and for other legal requirements, we ensure that they are contractually bound to apply the appropriate security practices.

12.5.2. Technical Measures

12.5.2.1. EFH has implemented the following technical measure to safeguard Personal Information:

- Firewalls
- Virus protection software and update protocols
- Physical access control
- Wireless access control
- Secure configuration of hardware and software

12.5.2.2. EFH also engages outsourced service providers who process Personal Information on behalf of Eerste Flambeau, contracted to implement the necessary security controls and to process certain Personal Information on behalf of EFH.

12.5.2.3. IT Security User awareness training workshops and programmes.

12.5.2.4. All use of our website and transactions through it are protected by encryption (secret codes) in line with international standards.

13. Access, Correction, Deletion OR Restriction of Personal Information

- EFH has established and implemented various policies and procedures to comply with, and to give effect to conditions for lawful processing of Personal Information under Chapter 3 of the POPIA.
- A Data Subject may at any time contact EFH Information Officer or Deputy Information Officer, in the details provided in this Manual, and may in accordance with the various policies and procedures request access, object to processing of their Personal Information or request to his/her/its Personal Information to be corrected or deleted.

14. Request Procedure

8.1 A Requester must comply with all the procedural requirements contained in section 53 of PAIA relating to the request for access to a record.

8.2 A Requester must complete the prescribed Request for Access Form C attached to this Manual as Appendix A

15. Availability of the Manual

8.3 A copy of the Manual is available-

8.3.1 on www.glodina.co.za and www.colibri.co.za if any;

8.3.2 head office of EFH at Glodina Towels for public inspection during normal business hours;

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

8.3.4 to the Information Regulator upon request.

8.4 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.

16. Updating of the Manual

The head of EFH on a regular basis updates this manual.

This manual of EFH and its Subsidiaries is approved and signed by the Information Officer on 11-Aug-26

Dave Govender

Chief Executive Officer

Appendix A
PRESCRIBED FORM C

EFH REQUEST FOR ACCESS TO RECORD (Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)	
NOTE: 1. Proof of identity must be attached by the requester. 2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form	
TO: The Information Officer _____ _____ _____ (Address) E-mail address: _____ Mark with an "X" <input style="width: 40px; height: 20px; border: 1px solid black;" type="checkbox"/> Request is made in my own name <input style="width: 40px; height: 20px; border: 1px solid black;" type="checkbox"/> Request is made on behalf of another person.	
PERSONAL INFORMATION	
Full Names	
Identity Number	
Capacity in which request is made (when made on behalf of another person)	
Physical Address	
Postal Address	
E-mail Address	

Contact Numbers	Tel. (B):	
	Cellular:	
	Facsimile:	
Full names of person on whose behalf request is made (if applicable):		
Identity Number		
Capacity in which request is made (when made on behalf of another person)		
Physical Address		
Postal Address		
E-mail Address		
Contact Numbers	Tel. (B):	
	Cellular:	
	Facsimile:	
PARTICULARS OF RECORD REQUESTED 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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)		
Description of record or relevant part of the record:		
Reference number, if available		
Any further particulars of record		

TYPE OF RECORD (Mark the applicable box with an "X")	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive(including virtual images and soundtracks)	
Copy of record saved on cloud storage server	
MANNER OF ACCESS (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
E-mail of information (including soundtracks if possible)	
PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.	
Indicate which right is to be exercised or protected Page 4 of 4 Explain why the record requested is required for the exercise or protection of the aforementioned right:	
FEES	

- a) A request fee must be paid before the request will be considered.
b) You will be notified of the amount of the access fee to be paid.
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

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Electronic communication
(Please specify)

Postal services to Physical/street
address

Postal address

Signed at _____ this _____ day of _____ 20_____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:

Request received by:
(State Rank, Name And
Surname of Information Officer

Access fees:

Deposit (if any):

Signature of Information Officer