

**GRACE INTEGRATED SYSTEMS (PTY) LTD**

REGISTRATION NUMBER: 2015/160549/07

**PAIA / POPI MANUAL**

# **GRACE INTEGRATED SYSTEMS (PTY) LTD**

THIS MANUAL WAS PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 ("The Act") AND TO ADDRESS REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 ("POPI")

This manual applies to Grace Integrated Systems (Pty) Ltd t/a  
Titan Technologies

Registered Office address:

20 Connor Road  
Chasedene  
Pietermaritzburg  
3201

(the "Company")

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## DOCUMENT MANAGEMENT

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## INTRODUCTION

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The Promotion of Access to Information Act, 2000 (the "Act") gives third parties the right to approach private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the private body or government is obliged to release such information unless the Act expressly states that the records containing such information may or may not be released.

This manual informs requestors of procedural and other requirements which a requestor must meet as prescribed by the Act.

### **NATURE OF BUSINESS:**

Grace Integrated Systems, t/a Titan Technologies offers access control to all sectors of the community to assist in security of their properties and person, whether in a domestic environment or whether on a large estate, or in business premises.

The services we provide are gate automation, electric fencing, installation and automation of garage doors. CCTV cameras, gate automation, burglar bars and security gates, together with booms and finger access.

### **Contact Details:**

Name of Business	:	Grace Integrated Systems (Pty) Ltd t/a Titan Technologies
Director of company	:	Mark Naidoo
Information Officer	:	Mark Naidoo / Jean Davy
Address	:	20 Connor Road; Chasedene; Pietermaritzburg 3201
Telephone	:	033-3943776
Email	:	<a href="mailto:jean@titantech.co.za">jean@titantech.co.za</a>
Website	:	<a href="http://www.titanttechnologies.co.za">www.titanttechnologies.co.za</a>

## **GUIDE OF HUMAN RIGHTS COMMISSION / INFORMATION REGULATOR**

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 (The Research and Documentation Department)

Postal Address:: Private Bag 2700. Houghton 2041

Telephone: +27 114 84 8300

Fax: +27 11484 7146

Website: [WWW.SAHRC.ORG.ZA](http://WWW.SAHRC.ORG.ZA)

Alternatively, its successor.

### **The Information Regulator (South Africa)**

SALU Building, 316 Thabo Sehume Street, Pretoria

Ms Mmamoroke Mphelo

Tel: 012-4064818

Fa: 086 500 3351

[infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

## **ACCESS FOR 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 requestor 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 requestors:

### **Personal Requestor:**

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

### **Other Requestor:**

This requestor (other than a personal requestor) 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 requestor must comply with all the procedural requirements contained in the Act relating to a request for access to a record. A requestor must complete the prescribed form enclosed herewith in appendix 1 and submit same as well as payment of a request fee and a deposit, if applicable, to the information officer at the postal or physical address, fax number 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 requestor
- What form of access is required, and
- The postal address or fax number of the requestor

A requestor 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 so to be exercised or protected. The requestor 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 days, unless the requestor has stated special reasons which would satisfy the information officer that circumstances dictate that the time period cannot be complied with.

The requestor shall be informed in writing whether access has been granted or denied. If, in addition, the requestor 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 requestor, must then submit proof of the capacity in which the requestor 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.

**Decision:**

The Company will within 30 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 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 days if the request is for a large quantity of information, or the request requires a search for information that cannot reasonably be obtained within the original 30 day period, the information officer will notify the requestor in writing should an extension be necessary.



## **FEES:**

The Act provides for two types of fees:

A request fee, (which will be a standard fee) and an access fee, which is to 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 requestor to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

The information officer shall withhold a record until the requestor has paid the fee or fees as indicated. A requestor 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 on 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.

## **PRESCRIBED FEES:**

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

- A requestor is required to pay the prescribed fees (R50.00) 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 was granted)
- A requestor 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 AFRICAN HUMAN RIGHTS COMMISSION at [www.sahrc.org.za](http://www.sahrc.org.za).

**CATEGORIES OF RECORDS HELD BY THE COMPANY: Section 51(1)(E)**

**Companies Act Records:**

- Documents of Incorporation
- Memorandum of Incorporation

**Financial Records:**

- Annual Financial Statements }
- Tax Returns }
- Accounting Records } Our financials are outsourced
- Banking Records }
- Bank Statements }
- Electronic Banking Records }
- Rental Agreements }
- Invoices }

**Tax Records:**

- PAYE Records }
- Records of payments made to SARS on behalf of employees }
- Vat } These are outsourced to our
- UIF } Accountant
- Workmen's compensation }

**Personnel Documents and Records:**

- Employment contracts
- Disciplinary Records
- Salary Records
- Disciplinary Code
- Leave Records

## **PROCESSING OF PERSONAL INFORMATION:**

The Company uses the Personal Information under its' care in the following ways:

- Rendering service according to instructions given by client
- Staff Administration
- Keeping of accounts and records
- Complying with tax laws

**CATEGORIES OF DATA SUBJECTS AND THEIR PERSONAL INFORMATION:**

The Company may possess records relating to suppliers, shareholders, contractors, service providers, staff and clients:

<b>ENTITY TYPE</b>	<b>PERSONAL INFORMATION PROCESSED</b>
Clients – Juristic Persons / Entities	Names of contact person; Names of Legal Entity; Physical and Postal address; Authorised signatories, Beneficiaries.
Clients	Names; Addresses; Contact details; physical and postal addresses; Confidential correspondence
Intermediary / Advisor	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details.
Employees / Directors	Physical and Postal address; contact details; Limited Medical records; ID Numbers; Financial Information; Employment History; Disciplinary history
Documents	Limited information available on website; Website. All above to be requested in writing in terms of PAIA.

## **CATEGORIES OF RECIPIENTS FOR PROCESSING THEIR PERSONAL INFORMATION:**

The Company keeps the basic Personal information in house for the following services:

- Capturing and organising of data
- Storing of data
- Sending of emails and other correspondence to clients
- Conducting due diligence checks

## **Actual or Planned Trans-Border Flows or Personal Information:**

- This does not apply to our company

## **General Description of Information Security Measures:**

- Firewalls
- Virus protection software and updated protocols
- Logical and Physical access control
- Secure setup of hardware and software making up the IT infrastructure
- Outsourced Service Providers who process Personal Information on behalf of the Company are contracted to implement security control.

## **REMEDIES AVAILABLE IF REQUEST FOR INFORMATION IS REFUSED:**

### **Internal Remedies:**

The Company does not have internal appeal procedure. 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 days of the 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 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.

**LIST OF APPLICABLE LEGISLATION:**

Records of the Company's and other legal entities in which the Company has a direct controlling interest or an indirect controlling interest, through its subsidiaries, may be kept by or on behalf of the Company, in accordance with the following legislation (some of which may not be applicable to the Company) as well as with other legislation that may apply to the Company and/or its subsidiaries from time to time.

<b>NO.</b>	<b>ACT</b>
1.	Basic conditions of Employment
2.	BBBEE Act 53 of 2003 – Companies Act 71 of 2008
3.	Compensation for Occupational Injuries and Diseases Act 130 of 1993; copyright Act 98 of 1978
4.	Employment Equity Act of 1998
5.	Income Tax Act 58 of 1995
6.	Occupational Health and Safety Act 85 of 1993
7.	Value added tax Act 89 of 1991
8.	Labour Relations Act 66 of 1995
9.	Unemployment Insurance Act of 63 of 2001

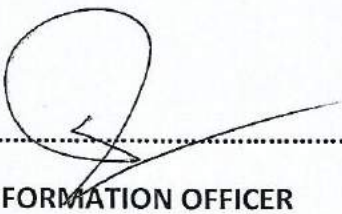
**AVAILABILITY OF THE MANUAL:**

The availability of the manual for inspection, on reasonable prior notice, can be viewed in our offices. There is also a copy on our website and manual copies are available at the Company offices, and are also available from the SAHRC.

**ASSENTED TO ON BEHALF OF THE COMPANY ON THIS 7 DAY OF JUNE 2021.06.18**

  
.....  
**DIRECTOR**

21/06/21  
.....  
**DATE**

  
.....  
**INFORMATION OFFICER**

21/06/21  
.....  
**DATE**



## FORM C

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:

### 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:

Fax number:

Telephone number:

E-mail address:

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

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

This section must be completed <i>ONLY</i> 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:
- 2 Reference number, if available:
- 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.

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</b> this includes photographs, slides, video recordings, computer-generated images, sketches, etc)					
	view the 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>					
	printed copy of record*	printed copy of information derived from the record"	copy in computer readable form* (stiffy or compact disc)		
*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.			<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center; border: none;">YES</td> <td style="width: 50%; text-align: center; border: none;">NO</td> </tr> </table>	YES	NO
YES	NO				

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

**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?

Signed at..... This..... day of .....20

SIGNATURE OF REQUESTER / PERSON ON  
WHOSE BEHALF REQUEST IS MADE