

PAIA MANUAL OF SAFETY SA GROUP ("PAIA MANUAL")

Prepared in accordance with Section 51 of the Promotor of Access to
Information Act, Number 2 of 2000 ("the Act")

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1. Safety SA Group Companies

- 1.1. Safety SA Holdco (Pty) Ltd ("herein referred to as Safety SA Group") is a registered legal entity established within the laws of South Africa with CIPC Registration Number: 2017/254215/07. The PAIA Manual is relevant and has application for the major subsidiaries of Safety SA as set out in the list below.
- 1.2. In this PAIA Manual, any reference to Safety SA Group includes any of the entities and / or brand names as listed below:
 - 1.2.1. Safety SA Holdco (Pty) Ltd, registration number 2017/254215/07.
 - 1.2.2. **SafetyCloud**, brand name, the legal entities listed below forms part of the SafetyCloud brand;
 - 1.2.3. NOSA (Pty) Ltd, registration number 2003/029513/07
 - 1.2.4. NOSA Logistics (Pty) Ltd, registration number 2003/010541/07
 - 1.2.5. NQA (Pty) Ltd, registration number 2001/023856/07; and
 - 1.2.6. NOSA Auditing and Inspection Services (Pty) Ltd, registration number 2005/013629/07.
 - 1.2.7. **AssureCloud**, brand name, the legal entities listed below forms part of the AssureCloud brand
 - 1.2.8. Aspirata Auditing Testing and Inspection (Pty) Ltd, registration number 2013/00208/07;
 - 1.2.9. World of Ethics (Pty) Ltd, registration number 2019/461436/07;
 - 1.2.10. Ethical Excellence (Pty) Ltd, registration number 2019/405347/07;
 - 1.2.11. Ethikos Academy (Pty) Ltd, registration number 2020/143585/07; and
 - 1.2.12. Quality and Safety Risk Professional Services International (Pty) Ltd, registration number 2002/016110/06.
 - 1.2.13. This PAIA Manual of Safety SA Group can be viewed on the website: www.safetysa.com.

2. Background

- 2.1. The Safety SA Group holds records pertaining to its customers which are required to provide the necessary services to its customers.
- 2.2. PAIA provides for the right of access to information held by another person which is required for the exercise or protection of any rights.
- 2.3. This Manual has been prepared in accordance with section 51 of PAIA in order to provide for the manner and procedure in which records held by the Safety SA Group can be requested.

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3. Right to Access Records of Private Body

- 3.1. In terms of PAIA, a person requesting records of a private body must be granted such access if:
 - 3.1.1. the record is required for the exercise or protection of any rights;
 - 3.1.2. the requesting person complies with the procedural requirements of PAIA; and
 - 3.1.3. access is not refused in terms of a ground for refusal contained in PAIA.

4. Records which can be accessed without a formal request

- 4.1. The Safety SA Group is required to hold records in terms of the following Acts:
 - 4.1.1. Basic Conditions of Employment Act, No. 75 of 1997;
 - 4.1.2. Companies Act, No. 71 of 2008;
 - 4.1.3. Compensation for Occupational Injuries and Diseases Act No. 130 of 1993;
 - 4.1.4. Consumer Protection Act No. 68 of 2008;
 - 4.1.5. Currency and Exchanges Act No. 9 of 1933;
 - 4.1.6. Electronic Communications and Transactions Act No. 25 of 2002;
 - 4.1.7. Employment Equity Act No. 55 of 1998;
 - 4.1.8. Financial Intelligence Centre Act No. 38 of 2001;
 - 4.1.9. Income Tax Act, No. 58 of 1962;
 - 4.1.10. Labour Relations Act No. 66 of 1995;
 - 4.1.11. National Credit Act No. 34 of 2005;
 - 4.1.12. Occupational Health and Safety Act No. 85 of 1993;
 - 4.1.13. Regulation of Interception of Communications Act, No. 70 of 2002;
 - 4.1.14. Skills Development Act No. 97 of 1998;
 - 4.1.15. Skills Development Levies Act No. 9 of 1999;
 - 4.1.16. Trade Marks Act No. 194 of 1993;
 - 4.1.17. Unemployment Insurance Act No. 63 of 2001;
 - 4.1.18. Unemployment Insurance Contributions Act No. 4 of 2002; and
 - 4.1.19. Value Added Tax Act No. 89 of 1991.

5. Request for Records

- 5.1. A request for records in terms of PAIA must be made formally by way of e-mail or registered mail and in the prescribed format (refer to Form C of this document).

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- 5.2. Requests for records must be directed to the Information Officer who shall consider the request and provide a decision within 30 (thirty) days of having received the request or having received the prescribed particulars in terms of section 53(2) of PAIA.
- 5.3. A request for information may be refused by the Safety SA Group if it does not comply with PAIA or if the Safety SA Group believes that there is a valid ground for objection in terms of PAIA.
- 5.4. The person requesting the information must provide the Safety SA Group with sufficient information for the Information Officer to identify the record and the person requesting the record.
- 5.5. The person requesting information must indicate the type of access required and his/her contact details including e-mail address, and postal address.
- 5.6. Should the requesting person prefer a certain means of communication, such means of communication must be included in the request for information.
- 5.7. Should a request for records be made on behalf of a third party, authority to do so must be provided to the Information Officer.

6. Granting of Request for Information

- 6.1. Should a request be granted, the Safety SA Group shall provide the requesting person with the following information:
 - 6.1.1. the access fee payable by the requesting person;
 - 6.1.2. the type of access which will be granted; and
 - 6.1.3. notice that the requesting person may approach a competent court to dispute the access fee or the type of access to be granted.
- 6.2. Once a request has been granted, the records shall be made available to the requesting person once the relevant fee has been paid.

7. Denial of Request for Information

- 7.1. A request for access to information may be refused in the following circumstances:
 - 7.1.1. protecting Personal Information that the Safety SA Group holds regarding a third party from unreasonable disclosure;
 - 7.1.2. protecting commercial information that the Safety SA Group holds regarding a third party which may harm the commercial or financial interests of such third party;
 - 7.1.3. if the disclosure would result in a breach of a duty of confidence owed to a third party;

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- 7.1.4. if the disclosure would jeopardise the safety or life of natural person;
- 7.1.5. if disclosure would prejudice or impair the security of property or means of transport of a person;
- 7.1.6. if disclosure would prejudice or impair the protection of a person who is subject to a witness protection scheme;
- 7.1.7. if disclosure would prejudice or impair the protection of the safety of the public;
- 7.1.8. the record is privileged from production in legal proceedings unless privilege in relation to such record has been waived;
- 7.1.9. if the record is a computer programme;
- 7.1.10. disclosure of the record will put the Safety SA Group at a disadvantage in contractual or other negotiations or prejudice the Safety SA Group in commercial competition;
- 7.1.11. disclosure of the record would harm the commercial or financial interests of the Safety SA Group; and
- 7.1.12. records containing information about research being carried out or about to be carried out on behalf of a third party or a company which is related to the Safety SA Group, and which have not been made public by the Safety SA Group.
- 7.2. Should a request be refused, the Safety SA Group shall provide the requesting person with the following information –
 - 7.2.1. adequate reasons for the refusal including the relevant sections of PAIA; and
 - 7.2.2. notice that the requesting person may lodge an application with a competent court against the refusal and against the procedure including the period for lodging the application.

8. Fees

- 8.1. A non-refundable request fee is payable to the Safety SA Group upon the submission of the request.
- 8.2. A requesting party who has made a request for access to records and such request has been granted must pay an access fee to the Safety SA Group for the search and preparation of the records and any time reasonably required which exceeds the prescribed hours for searching and preparation arrangements.
- 8.3. The prescribed forms and fees are available on the website of the Department of Justice and Constitutional Development.

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9. Request for Records Containing Third Party Information

- 9.1. Should records be requested that contain information pertaining to a third party, the Safety SA Group is obliged to attempt to contact the third party to inform it of the request and to provide it with the opportunity to respond to the request by consenting or providing reasons why the access should be refused.
- 9.2. Should the third party provide reasons for the support of or against providing access, the Information Officer will consider such reasons in determining whether access should be granted.
- 9.3. The requesting party may appeal the decision of the Information Officer to a competent court in the Republic of South Africa in accordance with PAIA.

10. Records that cannot be found or do not exist

- 10.1. Should all reasonable steps be taken by the Safety SA Group to find a requested record and there are reasonable grounds to believe that the record:
 - 10.1.1. is in the Safety SA Group's possession but cannot be found; or
 - 10.1.2. does not exist,
 - 10.1.3. then the Information Officer shall notify the requesting party that it is not possible to provide the requesting party access to such record.

11. Details of Information and Deputy Information Officer

11.1. Information Officer and Deputy Information Officers

Designation	Name	Contact Number	Email Address
Information Officer	Pieter Erasmus	+27872868222	compliance@safetysa.com
Deputy Information Officer	Karen de Jager		

11.2. Safety SA Group Head Office

Attention:	Compliance Department
Physical Address:	Porta Nova Building, Gazelle Close, Corporate Park South, Old Pretoria Road, Randjesfontein, Midrand, 1683
Postal Address	Porta Nova Building, Gazelle Close, Corporate Park South, Old Pretoria Road, Randjesfontein, Midrand, 1683
Telephone Number:	+27872868222
E-mail:	compliance@safetysa.com

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Form C: Request for Access to Record of Private Body

In terms of 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 (Name of Body).....

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:

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 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:

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3. Any further particulars of record:

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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:

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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:

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Form in which record is required:

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 to the record, if any, will be determined partly by the form in which access is requested.

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Mark the appropriate choice with an X.

1. If the record is in written or printed form:

- copy of record
- inspection of record

2. If record consists of visual images

(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):

- view the images copy of the images
- transcription of the images

3. If record consists of recorded words or information which can be reproduced in sound:

- listen to the soundtrack (audio file)
- transcription of soundtrack (written or printed document)

4. If record is held on computer or in an electronic or machine-readable form:

- 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.

- 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:

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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____

Sign Here

**SIGNATURE OF REQUESTER / PERSON ON WHOSE
BEHALF REQUEST IS MADE**
