



PAIA MANUAL

This manual was prepared to address the requirements of the Promotion of Access to Information Act, No. 2 of 2000.

This manual applies to

JEC Technologies Group

Company Registration Number: 2007/012347/23

12 Somerset Office Park, 5 Libertas Road, Bryanston, Sandton, 2191

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INTRODUCTION

The Promotion of Access to Information Act, No. 2 of 2000 (the “PAIA”) aims to give effect to the right of access pledged by the Constitution to information as contained in section 32 of the Bill of Rights. The PAIA seeks to advance the values of transparency and accountability.

This document serves as the Company information manual and provides a reference to the records held by the Companies as well as the personal information processed by the Company in the ordinary course of operations.

ABOUT THE COMPANY

In our capacity as a managed service provider, JEC Technologies Group helps clients resolve critical issues through managed services, cloud migration, and IT optimization. By providing a range of simplified services and solutions, we enable organizations to facilitate change, achieve their vision, and maximize performance by adding quantifiable value that makes us successful.

AVAILABILITY OF THE MANUAL

This manual must be available for inspection at:

Physical location - 12 Somerset Office Park, 5 Libertas Road, Bryanston, iFactory Building, Sandton, 2191, South Africa

Website - www.jectech.co.za

CONTACT PERSON – INFORMATION OFFICER - SECTION 51 (1)(A)(I)

The responsibility for the administration of, and compliance with the Acts, has been delegated to the Deputy Information Officer of JEC Technologies Group. Requests pursuant to the provisions of the Acts should be directed as follows:

Deputy Information Officer: Antwanette Currie

Postal address: 12 Somerset Office Park, 5 Libertas Road, Bryanston, iFactory Building, Sandton, 2191, South Africa

Street address: 12 Somerset Office Park, 5 Libertas Road, Bryanston, iFactory Building, Sandton, 2191, South Africa

Business Phone: +27 (0) 10 88000-70

E-mail address: Antwanette.Currie@jectech.co.za

HUMAN RIGHTS COMMISSION / INFORMATION REGULATOR GUIDE - SECTION 51(1) (B) (I)

A Guide has been compiled in terms of Section 10 of the PAIA by the Human Rights Commission. It contains information required by a person wishing to exercise any right contemplated by the PAIA. It is available in all the South African official languages.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:

Postal Address:	Private Bag 2700, Houghton, 2041
Telephone Number:	+27-11-877 3600
Fax Number:	+27-11-403 0625
Website:	www.sahrc.org.za

RECORDS AUTOMATICALLY AVAILABLE TO THE PUBLIC - SECTION 51(1)(B)(II)

No records will automatically be made available to the public, all access requests must be facilitated via the use of access request forms (Annexure A Form C).

RECORDS – CATEGORIES AND SUBJECT OF RECORDS - SECTION 51(1) (B) (IV)

The information contained in this section is intended to make clear the main categories of records held by the Companies and to help those who seek to request information in order to gain a better understanding of the main business activities of the Company. Further assistance in identifying the records held by the Companies is obtainable from the Information Officer.

COMPANY RECORDS	FINANCIAL RECORDS	INCOME TAX RECORDS	PERSONNEL / EMPLOYEE DOCUMENTS AND RECORDS	SAFETY, HEALTH AND ENVIRONMENT (SHE) RECORDS
Documents of incorporation	Annual Financial Statements	PAYE Records	Employment contracts	SHE Policy
Memorandum of Incorporation	Tax Returns	Documents issued to employees for income tax purposes	Employment Equity Plan	Mandatory SHE Records
Records relating to the appointment of directors/auditors/secretary	Accounting Records	Records of payments made to SARS on behalf of employees	Medical Aid records	
Public officers and other officers	Banking Records	All other statutory compliances: - VAT; - Skills Development Levies; - UIF; and - Workmen's Compensation	Pension Fund records	
Share Register and other statutory registers	Bank Statements		Disciplinary records	
	Paid Cheques		Salary records	
	Electronic banking records		SETA records	
	Asset Register		Disciplinary code	
	Rental Agreements		Leave records	
	Invoices		Training records	
			Training Manuals	

ACCESS REQUESTS

ACCESS REQUEST PROCEDURE - SECTION 53

COMPLETION OF ACCESS REQUEST FORM

To facilitate a timely response to requests for access, all requesters should take note of the following when seeking to obtain access:

- The Access Request Form, (attached as Annexure A – Form C), must be completed and submitted.
- Proof of identity is required to authenticate the identity of the requester – in addition to submission of the completed Access Request Form. Consequently, requesters will be required to supply a certified copy of their identification document or a valid passport document, or if a legal entity, a certified copy of the Company Registration Certificate.

Please take note of the following when completing the Access Request Form:

- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state “N/A” in response to that question.
- If there is nothing to disclose in reply to a particular question, state “NIL” in response to that question.
- If there is insufficient space on the printed form, additional information may be provided in an additional attached folio.
- When the use of an additional folio is required, precede each answer with the applicable title.

Please note that the successful completion and submission of an Access Request Form does not automatically constitute an approval of access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within PAIA.

If it is reasonably suspected that the requester has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

SUBMISSION OF ACCESS REQUEST FORM

The completed Access Request Form, together with a certified copy of the requestor's identity document, must be addressed to the Deputy Information Officer and submitted via the contact details stated above.

PAYMENT OF FEES

JEC Technologies does not charge the legally allowable fee to facilitate access requests.

NOTIFICATION

The Deputy Information Officer will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

These thirty days may be extended for a further period of not more than thirty days, if the request is for a large volume of information, or the request requires a search for information held at other offices of one or more of the Companies and the information cannot reasonably be obtained within the original thirty-day period. The requester will be notified in writing should an extension be sought.

GROUNDINGS FOR REFUSAL OF ACCESS TO RECORDS

The main grounds for refusal of a request for information if the request process was followed are:

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that party;
 - Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that party;
 - Information disclosed by a third party to any of the Companies if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement – the provisions of the PAIA to apply in relation to the rights of the relevant third parties;
- Mandatory protection of the safety of individuals and the protection of property;
- Mandatory protection of records that could be regarded as privileged in legal proceedings;
- The commercial activities of the Companies, which may include:
 - Trade secrets of the Companies; and
 - Financial, commercial, scientific, or technical information that, if disclosed, would likely cause harm to the financial or commercial interests of the Companies.

APPEAL AGAINST REFUSAL TO GRANT ACCESS

If a requester is aggrieved by the refusal of the Information Officer to grant a request for a record, the requester may, upon notification of the Information Officer's decision (or upon deemed refusal in terms of Section 58 of the PAIA), lodge a complaint to the Information Regulator or apply to court for appropriate relief within the timeframes as prescribed by the PAIA.

PERSONAL INFORMATION

PURPOSE OF PROCESSING - SECTION 51(1) (C) (I)

In general, personal information is processed by the Companies for business administration purposes and in the ordinary course of operation, which would include:

- Provision of our goods and services
- Keep our data subject records up to date
- Manage employees in general
- Manage supplier contracts in general
- Manage customers in general
- Manage customer credit in general
- Enforce debts
- Market goods and services to prospects
- Process customer requests or complaints
- Process personal information of employees for administrative purposes.

CATEGORIES OF DATA SUBJECTS AND INFORMATION - SECTION 51(1) (C) (II)

Personnel/ employees	Consultants	Contractors	Customers	Service providers	Suppliers	Other third parties
Gender	Name	Name	Company name	Name	Company Details	
Race	Surname	Surname	Company reg. name	Surname	Billing contacts	
Disabilities	Contact Details		VAT Number		Billing details	
Name			Telephone number			
Surname			Address			
ID Number			Billing contact name			
Income tax number			Billing contact number			

Marital status			Billing contact email			
Physical address			Technical contact name			
Cell phone number			Technical contact number			
Telephone number			Technical contact email			
Email address			Name			
Bank account number			Address			
Bank details			Cell phone number			
Medical aid membership no.			Bank account number			
Spouse's name			Bank details			
Spouse's ID number			Card number			
Spouse's contact details			Card details			
Next of Kin's Name & Surname						
Next of Kin's Contact details						
Photograph						

CATEGORIES OF INFORMATION

In respect of natural persons may include:

- Name;
- Identifying number (identity or passport number);
- Date of birth;
- Citizenship;
- Age;
- Gender;
- Race;
- Marital status;
- Language;
- Telephone number(s);
- Email address(es);
- Physical and postal addresses;
- Income tax number;
- Disability information;
- Employment history;
- Background checks;
- Fingerprints;
- CVs;
- Education history;
- Remuneration and benefits information;
- Details related to employee performance as well as disciplinary procedures.

In respect of juristic persons may include:

- Name;
- registration number;
- Tax information;
- Contact details;
- Physical and postal addresses;
- FICA documentation;
- BEE certificates;
- Payment details (including bank accounts);
- Invoices as well as contractual agreements.

**CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED -
SECTION 51(1)(C)(III)**

The categories of recipients to whom the Company may supply the data subject's personal information will depend on the nature of the information. In general, such categories of recipients would include:

- Agents and suppliers, including those who provide technology services such as data analytics, hosting, and technical support;
- Professional advisors, auditors, and business partners;
- Regulators, governments, and law enforcement authorities; and
- Other third parties in connection with the development and enhancement of our business model.
- Service providers;
- Medical aid, pension, or provident funds;
- Auditing and accounting bodies (internal and external);

Third parties with whom the Companies have contracted for the retention of data may include:

- Relevant authorities,
- Government departments,
- Statutory bodies or regulators;
- A court, administrative or judicial forum,
- Arbitration or statutory commission making a request in terms of the applicable laws or rules.

ANNEXURE A – FORM C

Form C, the document which is to be completed and submitted as part of the access request procedure, is an additional document to this PAIA manual, which we will make available to you.

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 the private body

The Head:

B. Particulars of the 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 number: (.....)

E-mail address:

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

C. Particulars of the person on whose behalf the 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:

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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:

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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 a record

If you are prevented by a disability to read, viewing, or listening to the record in the form of access provided for in 1 to 4 below, 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 for access 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) (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If the 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 the record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If the record is held on a computer or in an electronic or machine-readable form:					
	A printed copy of the record*		A 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
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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:

.....

.....

.....

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

.....
.....
.....

H. Notice of decision regarding a 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..... ofyear

.....
SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF
THE REQUEST IS MADE