

**ACCESS SYSTEMS SOLUTIONS PROPRIETARY LIMITED PAIA MANUAL -
UPDATED (Section 51)**

ACCESS SYSTEMS SOLUTIONS (PTY) LTD

PAIA MANUAL

*Prepared in terms of the Promotion of Access to Information Act 2 of 2000 (PAIA)
and aligned with POPIA (Act 4 of 2013).*

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1. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.2 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;
- 1.3 know the description of the records of the body which are available in accordance with any other legislation;
- 1.4 access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- 1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6 know if the body will process personal information, the purpose of processing personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9 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
- 1.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

2. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Name of the private body	ACCESS SYSTEM SOLUTIONS (PTY) LTD
Registration number	2018/584684/07
Information Officer	SAMUEL MARCOS DOS REIS ROCHA
Registered street address	9 Kinross Street, Germiston South, 1401
Postal address	PO BOX 4119, Germiston South, Germiston South, 3370, 1411
Telephone number	0118730234
E-mail address	marcos.reis@access-pty.com
Person duly authorized to assist in all requests for access to information.	SAMUEL MARCOS DOS REIS ROCHA

3. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 3.1 The Information 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.
- 3.2 The Guide is available in English.
- 3.3 The aforesaid Guide contains the description of-
 - 3.3.1 the objects of PAIA and POPIA;
 - 3.3.2 the postal and street address, phone and electronic mail address of the Information Officer;
 - 3.3.3 the request forms and submission procedures-
 - 3.3.3.1 assistance available in terms of PAIA and POPIA;
 - 3.3.3.2 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 3.3.4 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-
 - 3.3.4.1 an internal appeal;
 - 3.3.4.2 a complaint to the Regulator;
 - 3.3.4.3 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; and
 - 3.3.4.4 regulations and fees.
- 3.4 The Guide can also be obtained-
 - 3.4.1 upon request to the Information Officer;
 - 3.4.2 from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4. CATEGORIES OF RECORDS AVAILABLE

- 4.1 Records of a public nature, typically those disclosed on the Company's website and annual reports may be accessed by the public without the need to submit a formal application in terms of PAIA.
- 4.2 Access to all other non – public records held by the Company, should be formally applied for in terms of the provisions of PAIA.
- 4.3 Where applicable the Company holds records as required in accordance with the legislation listed below. Take note that accessibility to documents and records kept in accordance with legislation may be refused in accordance with the grounds of refusal as set out in this Manual and/or PAIA.
 - 4.3.1 Companies Act 71 of 2008;
 - 4.3.2 Basic Conditions of Employment Act 75 of 1997;

- 4.3.3 Labour Relations Act 66 of 1995;
 - 4.3.4 Employment Equity Act 55 of 1998;
 - 4.3.5 Employment Services Act 4 of 2014;
 - 4.3.6 Skills Development Act 97 of 1998;
 - 4.3.7 Skills Development Levies Act 9 of 1999;
 - 4.3.8 Unemployment Insurance Act 63 of 2001;
 - 4.3.9 Unemployment Insurance Contributions Act 4 of 2002;
 - 4.3.10 Compensation for Occupational Injuries and Diseases Act 130 of 1993;
 - 4.3.11 Occupational Health and Safety Act 85 of 1993;
 - 4.3.12 Immigration Act 13 of 2002;
 - 4.3.13 Income Tax Act 58 of 1962;
 - 4.3.14 Value-Added Tax Act 89 of 1991;
 - 4.3.15 Tax Administration Act 28 of 2011;
 - 4.3.16 Broad-Based Black Economic Empowerment Act 53 of 2003;
 - 4.3.17 Financial Intelligence Centre Act 38 of 2001 (where applicable);
 - 4.3.18 Protection of Personal Information Act 4 of 2013;
 - 4.3.19 Promotion of Access to Information Act 2 of 2000;
 - 4.3.20 Regulations Relating to the Protection of Personal Information, 2018;
 - 4.3.21 Electronic Communications and Transactions Act 25 of 2002;
 - 4.3.22 Cybercrimes Act 19 of 2020;
 - 4.3.23 Consumer Protection Act 68 of 2008;
 - 4.3.24 Constitution of the Republic of South Africa, 1996;
 - 4.3.25 Mineral and Petroleum Resources Development Act 28 of 2002;
 - 4.3.26 Upstream Petroleum Resources Development Act 23 of 2024 (where applicable);
 - 4.3.27 Petroleum Products Act 120 of 1977 (where applicable);
 - 4.3.28 Mine Health and Safety Act 29 of 1996 (where applicable);
 - 4.3.29 National Environmental Management Act 107 of 1998 (where applicable); and
 - 4.3.30 Pension Funds Act 24 of 1956 (where applicable).
- 4.4 the Company also holds the following categories of information detailed below. A request made in terms of PAIA for records in any of the categories may be refused in accordance with the grounds of refusal in this manual and/or PAIA.
- 4.4.1 Client-related records:
 - 4.4.1.1 Records provided by clients;

- 4.4.1.2 Records provided by clients to third parties acting on behalf of the Company;
- 4.4.1.3 Records generated by or within the Company relating to its clients, including consulting mandates, proposals, service level agreements and transactional records;
- 4.4.1.4 Records provided by a third party relating to the Company's clients.
- 4.4.2 Candidate, contractor and placement records:
 - 4.4.2.1 Curricula vitae, qualifications, professional certifications and competency records;
 - 4.4.2.2 Recruitment, screening, vetting and background verification records;
 - 4.4.2.3 Work permits, visas, immigration and cross-border mobility documentation;
 - 4.4.2.4 Placement contracts, assignment records and timesheets;
 - 4.4.2.5 Medical fitness, safety induction and site clearance records;
 - 4.4.2.6 Remuneration, invoicing and payment records relating to placed personnel.
- 4.4.3 Human resource records:
 - 4.4.3.1 Personal records;
 - 4.4.3.2 Employment contracts;
 - 4.4.3.3 Medical aid records;
 - 4.4.3.4 Retirement annuity fund records;
 - 4.4.3.5 Workplace policies;
 - 4.4.3.6 Disciplinary records;
 - 4.4.3.7 Leave records;
 - 4.4.3.8 Training records;
 - 4.4.3.9 Skills development / levy records;
 - 4.4.3.10 Employee addresses and contact lists;
 - 4.4.3.11 Performance management records;
 - 4.4.3.12 Employee correspondence.
- 4.4.4 Business / Statutory related records:
 - 4.4.4.1 Company incorporation documents;
 - 4.4.4.2 Minutes of meetings of the board of directors;
 - 4.4.4.3 Records relating to the appointments of directors, auditors and other officers;
 - 4.4.4.4 Receipts and payments;
 - 4.4.4.5 Bank statements;

- 4.4.4.6 List of debtors and creditors;
- 4.4.4.7 Management accounts;
- 4.4.4.8 Asset registers;
- 4.4.4.9 Invoices;
- 4.4.4.10 Trade marks and intellectual property;
- 4.4.4.11 Internal and external correspondence;
- 4.4.4.12 Marketing material, newsletters and brochures;
- 4.4.4.13 Policies and procedures;
- 4.4.4.14 Company secretarial records;
- 4.4.4.15 Supplier contracts;
- 4.4.4.16 Lease agreements.
- 4.4.5 Information technology records:
 - 4.4.5.1 IT usage, equipment and security details;
 - 4.4.5.2 Software licenses and supplier agreements;
 - 4.4.5.3 Information policies and procedures.

5. PROCESSING OF PERSONAL INFORMATION

5.1 POPIA

- 5.1.1 the Company processes personal information in accordance with Chapter 3 of POPIA for business operations, human resources, client services, recruitment and placement, and legal compliance.
- 5.1.2 Security safeguards are implemented to protect data.

5.2 Processing of personal information by the Company

- 5.2.1 the Company processes personal information in the ordinary course of business. Personal information is processed for several reasons, including–
 - 5.2.1.1 the provision of consulting services to clients;
 - 5.2.1.2 the sourcing, screening, placement and management of specialised human resources for clients in the oil and gas sector;
 - 5.2.1.3 creating and managing commercial relationships with clients;
 - 5.2.1.4 creating and managing supplier and candidate relationships;
 - 5.2.1.5 facilitating work permits, visas and the cross-border mobility of personnel;
 - 5.2.1.6 general human resource and payroll functions – including obligations imposed by legislation;
 - 5.2.1.7 recruitment and procurement processes;
 - 5.2.1.8 analysis, evaluation, review and collation of information to provide advice and prepare or comment on opinions, memoranda, agreements,

correspondence, reports, publications, documents and other related business records;

5.2.1.9 safety and security measures.

5.3 Categories of data subjects and types of personal information processed

5.3.1 Personal information of both natural and juristic persons is processed by the Company in relation to – employees, clients and potential clients, candidates and contractors placed with clients, service providers, visitors, interviewees, and attendees of the Company events (seminars, training sessions, etc.).

5.4 Disclosure of personal information to third parties

5.4.1 the Company may disclose personal information processed to third parties for legitimate business purposes, in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality.

5.4.2 Where the Company discloses information to third parties - the latter will be obliged to use such information for the reasons and purpose the personal information was disclosed for.

5.4.3 the Company may be obliged to disclose personal information where a duty to disclose is necessary, as required by legislation, or to protect the rights of the Company.

5.5 Data security

5.5.1 the Company takes reasonable technical and organizational measures to protect and secure personal information from unauthorised or unlawful processing or access, accidental loss, alteration, damage or disclosure.

5.5.2 the Company regularly reviews security controls and processes to secure personal information. Where reasonable grounds exist that personal information has been accessed or acquired unlawfully by a third party, the Company will notify the Information Regulator and the data subject concerned – unless the Regulator or other investigative body informs the Company that such a notification will impede a criminal investigation.

5.6 Objecting to processing of personal information – correction, deletion or destruction of personal information

5.6.1 For POPIA – related requests to object to the processing, correction, deletion or destruction of personal information held by the Company, the requester must complete either Annexure A (objection) or Annexure B (correction, deletion or destruction) attached to this Manual and submit same to the Information Officer at the addresses provided for in paragraph 2 of this Manual.

5.6.2 Data subjects have the right to request the Company to confirm:

5.6.2.1 whether it holds personal information about the subject;

5.6.2.2 the nature / description of the personal information held;

5.6.2.3 the details of third parties who have or have had access to the personal information.

5.6.3 the Company may charge the prescribed fees for reproduction of the personal information requested.

5.6.4 PAIA related requests may also be made by submitting the prescribed forms available on the website of the South African Human Rights Commission at www.sahrc.org.za

6. ACCESS TO A RECORD / INFORMATION

6.1 Procedural requirements

6.1.1 To request a record / information in terms of PAIA the requester must complete Annexure C to this Manual and submit same to the Information Officer at the address provided in paragraph 2 of this Manual. The prescribed forms available on the website of the South African Human Rights Commission at www.sahrc.org.za may also be utilized.

6.1.2 All information requested in Annexure C must be provided, failing which the process will be delayed until the required information is provided. The requester must provide sufficient detail on:

6.1.2.1 the record / information being required;

6.1.2.2 the nature or form of access that is required;

6.1.2.3 the right that the requester is seeking to exercise and protect;

6.1.2.4 the reason why access to information is required to exercise or protect the right;

6.1.2.5 the identity and contact details of the requester.

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

6.2 Fees Payable

6.2.1 PAIA provides for two types of fees payable, namely

6.2.1.1 a request fee – which is a standard non-refundable fee, payable to the Company prior to the request being considered; and

6.2.1.2 an access fee – payable to the Company when access is granted and calculated with reference to reproduction costs, search, preparation and postal costs.

6.2.2 the Company may withhold a record / information until a requester has paid the fees applicable in terms of 6.2.1.1 and 6.2.1.2.

6.2.3 The fee structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za.

6.3 Applicable time periods

6.3.1 the Company will inform the requester within 30 days after receipt of the request - of its decision to either grant or refuse the request. The 30-day period will start once the Company receives all required information in the application request.

6.3.2 In addition, the 30-day period may be extended by a further period of not more than 30 days if the request:

6.3.2.1 requires reviewing an extensive amount of information;

6.3.2.2 would unreasonably interfere with the activities of the Company;

6.3.2.3 relates to records sought that are not located at the Company's offices / premises.

7. OUTCOME OF REQUEST FOR INFORMATION

7.1 Granting of information request

7.1.1 In circumstances where the Company grants a request for access to information, the Company shall advise the requester of such decision and disclose the record of information only when payment of the access and reproduction fees has been received.

7.2 Refusal of request for information

7.2.1 the Company is entitled in terms of the provisions of PAIA to refuse access to information on the following grounds:

7.2.1.1 mandatory protection of the privacy of a third party who is a natural person, a deceased person or a juristic entity – which would involve the unreasonable disclosure of personal information;

7.2.1.2 mandatory protection of personal information and disclosure of personal information to comply with the provisions of POPIA;

7.2.1.3 mandatory protection of the commercial information of a third party, if the record of information requested, contains:

7.2.1.3.1 trade secrets of the third party;

7.2.1.3.2 financial, scientific, commercial or technical information - the disclosure of which could likely cause harm to the financial or commercial interests of a third party;

7.2.1.3.3 information disclosed in confidence by a third party to the Company – if the disclosure of such information could put such party at a disadvantage in negotiations and commercial competition;

7.2.1.3.4 mandatory protection of confidential information of third parties protected in terms of an agreement;

7.2.1.3.5 mandatory protection of the safety of individuals and protection of property;

7.2.1.3.6 mandatory protection of records which would be regarded as privileged in legal proceedings;

7.2.1.3.7 the commercial dealings of the Company, which may include (but are not limited to):

7.2.1.3.7.1 trade secrets;

7.2.1.3.7.2 financial, commercial, scientific, technical or research information which disclosure could likely cause harm to its financial or commercial interest;

7.2.1.3.7.3 requests for information that are frivolous and vexatious or require an unreasonable diversion of resources.

7.2.2 In circumstances where a record cannot be found by the Company or a record does not exist, the Information Officer shall, by way of affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be deemed to be a decision to refuse a request for access to the record for purposes of PAIA. If the record should later be found, the requester shall be given access to the record – unless the Information Officer refuses access to such record.

7.3 Remedies for refusal of request for information

7.3.1A requester or third party that is dissatisfied with the Information Officer's refusal to grant access to the requested information, may within 30 (thirty) days of notification of the decision, apply to a Court with competent jurisdiction, for relief.

8. AVAILABILITY OF PAIA MANUAL

8.1 This Manual is available in English in electronic and hard copy format. The hard copies are available at the head office of the Company as contained in paragraph 2. The electronic version of this Manual is available on the Company's website.

ANNEXURE A

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT 2013 (ACT NO. 4 OF 2013)

Note:

1. Affidavits or other documentary evidence in support of the objection must be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. The completed form and annexures (if any) must be addressed and sent to the Company's Information Officer using the address and contact details specified in the Company's PAIA Manual.

DETAILS OF DATA SUBJECT

Surname	
Full Names	
Residential, postal or business address	
Contact Numbers	
E-mail address	

REASONS FOR OBJECTION TO PROCESSING PERSONAL INFORMATION

.....
Data Subject Signature

.....
Date

ANNEXURE B

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT 2013 (ACT NO. 4 OF 2013)

Note:

1. Affidavits or other documentary evidence in support of the objection must be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. The completed form and annexures (if any) must be addressed and sent to the Company's Information Officer using the address and contact details specified in the Company's PAIA Manual.

Mark the appropriate box with an X. Request for:

Correction or deletion of personal information about the data subject which is in possession or under control of the Company.	
Destroying or deletion of a record of personal information about the data subject which is in possession or under control of the Company and who is no longer authorised to retain the record of information.	

DETAILS OF DATA SUBJECT

Surname	
Full Names	
Residential, postal or business address	
Contact Numbers	
E-mail Address	

REASONS FOR REQUEST

.....
Data Subject Signature

.....
Date

ANNEXURE C

REQUEST FOR ACCESS TO A RECORD

Note:

1. Proof of identity must be attached by the requester.
2. If request is made on behalf of another person, proof of such authorization must be attached to this Form.
3. The completed Form and annexures (if any) must be addressed and sent to the Company's Information Officer using the address and contact details specified in the Company's PAIA Manual.

Mark the appropriate box with an X

Request is made in my own name	
Request is being made on behalf of another person	

PERSONAL INFORMATION

Surname	
Full Names	
Identity Number	
Capacity in which request is made (when made on behalf of another person)	
Postal Address	
Street Address	
E-mail address	
Contact Numbers	
Full name of person on whose behalf request is made (if applicable)	
Identity number	
Postal Address	
Street Address	
E-mail Address	
Contact numbers	

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is required, including the reference number if that is known to you, to enable the record to be located. (If there is not enough space, please use an additional page and attach it to this form. All additional pages to the Form must be signed.)

Description of record or relevant part of record	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD (Mark with an X)

Record is in printed or written 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 an electronic, or machine-readable form	

FORM OF ACCESS (Mark 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 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)	
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Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share / file transfer	

Preferred Language:

(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available.)

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the right	

FEES

- A request fee must be paid before the request is considered.
- You will be notified of the amount of the access fee to be paid.
- The fee payable for access to the record depends on the form in which access is required, and the reasonable time required to search for and prepare a record.
- If you qualify for an exemption of the payment of any fee, please state the reason for exemption below:

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:

Postal Address	
Facsimile	
Electronic Communication	

Signed at _____ this _____ day of _____ 20____

.....

Signature of Requester / person on whose behalf request is made