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# PAIA MANUAL

**Prepared in terms of section 51 of the Promotion of Access  
to Information Act 2 of 2000 (as amended)**

**DATE OF COMPILATION: 08/10/2021**

**DATE OF REVISION: 08/10/2022**

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

- |     |                    |  |
|-----|--------------------|--|
| 1.1 | <b>“CEO”</b>       | Chief Executive Officer  |
| 1.2 | <b>“DIO”</b>       | Deputy Information Officer;  |
| 1.3 | <b>“IO”</b>        | Information Officer;   |
| 1.4 | <b>“Minister”</b>  | Minister of Justice and Correctional Services;                       |
| 1.5 | <b>“PAIA”</b>      | Promotion of Access to Information Act No. 2 of 2000<br>(as amended) |
| 1.6 | <b>“POPIA”</b>     | Protection of Personal Information Act No.4 of 2013;                 |
| 1.7 | <b>“Regulator”</b> | Information Regulator; and   |
| 1.8 | <b>“Republic”</b>  | Republic of South Africa   |

## 2. 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.

### **3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF COMPANY**

#### **3.1. Chief Information Officer**

Name: Barbara Moore  
Tel: 011 976 3063  
Email: bmoore@techedge.co.za  
Fax number: NA

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: NA  
Tel:  
Email:  
Fax number:

- 3.3 Access to information general contacts

Email: techedge@techedge.co.za

#### **3.4 National or Head Office**

Postal Address: PO Box 2289, Highlands North, 2037  
Physical Address: Unit 21, 2nd floor, 1 Melrose Boulevard, Melrose Arch, 2196  
Telephone: 011 976 3063  
Email: bmoore@techedge.co.za  
Website: <http://techedge.co.za/>

#### 4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. 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.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
  - 4.3.1. the objects of PAIA and POPIA;
  - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
    - 4.3.2.1. the Information Officer of every public body, and
    - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 4.3.3. the manner and form of a request for-
    - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
    - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
  - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
  - 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

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<sup>1</sup> 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.*

<sup>2</sup> 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.*

<sup>3</sup> 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.*

<sup>4</sup> 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.*

- 4.3.6. 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-
- 4.3.6.1. an internal appeal;
  - 4.3.6.2. a complaint to the Regulator; and
  - 4.3.6.3. 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;
- 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92<sup>11</sup>.

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<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

4.4. 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.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English and [please state your 2<sup>nd</sup> language preference]

**5. CATEGORIES OF RECORDS OF COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

*NB: Please specify the categories of records held by the body which are available without a person having to request access by completing Form C, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.*

Category of records	Types of the Record	Available on Website	Available upon request
Public	Public Product Information	X	X
	Public Corporate Records		X
	Media Releases		X
	Market Information	X	X
	Customer Information		X
	Product Brochures / Information	X	X

**6. DESCRIPTION OF THE RECORDS OF COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

*NB: Please specify all the records which are created and available in accordance with any of the South African 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
Employment Equity Plan	Employment Equity Act No 55 of 1998
Company Tax Certificate	Income Tax Act No 95 of 1967
Company VAT registration Certificate	Value Added Tax Act No 89 of 1991
Company Policies & Procedures	Labour Relations Act No 66 of 1995
Company Policies & Procedures	Basic Conditions of Employment Act No 75 of 1997
Company Policies & Procedures	Electronic Communications and Transactions Act No 25 of 2002
Company Policies & Procedures	Unemployment Insurance Act No 30 of 1996
Company Policies & Procedures Workplace Skills Plan Annual Training Report	Skills Development Act 97 of 1998
Company Levy Number	Skills Development Levies Act 9 of 1999
Membership Certificate	Industry: Main Agreement
Company Policies & Procedures	National Minimum Wage Act
Compliance documents Proof of TERS Claims	Unemployment Insurance Act No 30 of 1996
COID Registration Company Policies & Procedures	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Scorecard	Broad-based Black Economic Empowerment (BBBEE)

**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY COMPANY**

*NB: Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject.*



Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	<ul style="list-style-type: none"> <li>- Annual Reports</li> <li>- Strategic Plan</li> <li>- Annual Performance Plan</li> <li>- BBBEE Scorecard</li> <li>-</li> </ul>
Operations	<ul style="list-style-type: none"> <li>- Vendor / Service Providers / Supplier information</li> <li>- Client / Customer information</li> <li>- Project plans</li> <li>- Budgets</li> <li>- Delivery and collection sheets</li> <li>- Risk Assessments</li> <li>- Health and Safety (inc covid) related risk assessment</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>- HR policies and procedures</li> <li>- Advertised posts</li> <li>- Employees records</li> <li>- Contractor information</li> <li>- Employment history</li> <li>- Employee Training and Development</li> <li>- Employee emergency contact information</li> <li>- Employee POPI Consent</li> <li>- Employee Covid-19 related information</li> <li>- Employee Medical Information</li> <li>- Employment Equity Information (movements, recruitment, terminations, promotions &amp; succession planning)</li> <li>- Health and Safety records</li> </ul>
Payroll	<ul style="list-style-type: none"> <li>- Employee remuneration</li> <li>- Employee deductions</li> <li>- Employee benefits</li> </ul>

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> <li>- Pension / Provident</li> <li>- Workman's Compensation Claims</li> <li>- UIF Claims</li> <li>-</li> </ul>
Statutory Returns	<ul style="list-style-type: none"> <li>- VAT</li> <li>- COID</li> <li>- PAYE</li> <li>- UIF</li> <li>- Skill Levies</li> </ul>
Industry	<ul style="list-style-type: none"> <li>- Collective Bargaining Levies</li> <li>- Copies of Collective Agreements</li> <li>-</li> </ul>

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

The lawful processing of personal information is required for

- (a) Recruiting, on-boarding of employees, issues relating to the on-going employment of employees and details relating to the termination of employees
- (b) External, purpose-specific business or operational reporting to relevant responsible parties, to perform the contract agreement
- (c) Internal, purpose-specific business or operational reporting to identified responsible parties
- (d) Information & Communication Technology
- (e) Complying with the law and/or for a purpose that is ancillary to compliance with the law

### 8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

*NB: Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.*

Categories of Data Subjects	Personal Information that may be processed
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Categories of Data Subjects	Personal Information that may be processed
Customers / Clients & their employees	<ul style="list-style-type: none"> <li>- Company name, addresses, contact details and website information and / social media information</li> <li>- Company registration numbers</li> <li>- Employee contact details, including landline numbers, emails &amp; cell phone numbers</li> </ul>
Service Providers & their employees	<ul style="list-style-type: none"> <li>- Company name, addresses, contact details and website information and / social media information</li> <li>- Company registration numbers</li> <li>- Banking details</li> <li>- Employee contact details, including landline numbers, emails &amp; cell phone numbers</li> <li>- Scorecard, tax certificates</li> <li>-</li> </ul>
Company Employees	<ul style="list-style-type: none"> <li>- Personal contact details, race and gender, marital, family status and emergency contact details,</li> <li>- Payroll / Salary Information, Financial Information, including garnishees and other statutory deductions, SARS Information</li> <li>- Medical Aid and health status Information, including Special personal information and extending to family</li> <li>- Pension / Provident Information (extending to family)</li> <li>- Employee Special Personal information</li> <li>- Employee Remuneration &amp; Financial information</li> <li>- Employee Family contact, special personal information &amp; status information</li> <li>- Membership to organisations,</li> </ul>

Categories of Data Subjects	Personal Information that may be processed
	<ul style="list-style-type: none"> <li>Trade union membership</li> <li>- Photos, voice recording, CCTV footage, biometric data and reporting methods attached to these.</li> <li>- Special personal information - Aspects of beliefs, religion, political persuasion, philosophical ideas, values related to their sex, sex life and or gender, biometric information</li> <li>- Alleged criminal behaviour and processing relating to proceedings relating to said allegations</li> <li>-</li> </ul>
External / Independent Contractors	<ul style="list-style-type: none"> <li>- Company name, addresses, contact details and website information and / social media information</li> <li>- Company registration numbers</li> <li>- Banking details</li> <li>- Employee contact details, including landline numbers, emails &amp; cell phone numbers</li> <li>- Scorecard, tax certificates</li> </ul>

**8.3 The recipients or categories of recipients to whom the personal information may be supplied**

*NB: Specify the person or category of persons to whom the body may disseminate personal information.*

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
<p>All aforementioned employee personal information and special personal information (purpose-specific only), including personal information and special personal information of immediate family members</p>	<ul style="list-style-type: none"> <li>- merSETA grant applications</li> <li>- Department of Labour - Unemployment Fund, Workman's compensation (COID / RMA), Employment Equity reporting, Covid-19 TERS</li> <li>- CCMA / CDR</li> <li>- Company-engaged external service providers and associations (HR / Payroll / Accountants etc)</li> <li>- Medical Aid service Providers</li> <li>- Auditors, external business consultants, BBBEE Auditors</li> <li>- Internal company POPI Operators (Bookkeeper / Accounts Department employees etc)</li> <li>- Company clients / customers</li> </ul>

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
	<ul style="list-style-type: none"> <li>- Pension / Provident Funds</li> </ul>
Identity number, names, employment history, associations and memberships (purpose specific) for credit, recruitment or criminal checks, with prior consent of the employee or prospective employee	<ul style="list-style-type: none"> <li>- South African Police Services</li> <li>- Other accredited bodies</li> <li>- Credit Bureaus</li> <li>- Any Legally authorised external bodies</li> </ul>
Qualifications, for qualification verifications	<ul style="list-style-type: none"> <li>- South African Qualifications Authority</li> <li>- Umalusi</li> <li>- Department of Education</li> <li>- Other relevant educational institutions (eg training providers)</li> </ul>
Health & Safety Records	Specific as required by clients / customers for compliance with their workplace, or in terms of a project
Name, ID, Job function, employment confirmation, confirmation of pay date	With prior consent from employees, to companies requiring confirmation of employment eg for the purposes of opening an account
Name and confirmation of pay date	On receipt of legal documentation, Garneshee orders
Client / Customer / Vendor / Service Provider Information (purpose-specific) contact details	With prior consent from relevant organisation or organisation's individual, for reasons relating to business or income generation specifically for the organisation in mind (eg business referrals)

#### 8.4 Planned transborder flows of personal information

*NB: Indicate if the body has planned transborder flows of personal information. For example, some personal information may be stored in the cloud outside the Republic. Please specify the country in which personal information will be stored and categories of personal information.*

#### 8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

*NB: Specify the nature of the security safeguards to be implemented or under implementation to ensure the confidentiality and integrity of the personal information under the care of the body. This may, for example, include Data Encryption; Anti-virus and Anti-malware Solutions.*

- (a) Created and implemented company POPI Policy, including providing training to employees and company identified Operators & Sub-Operators regarding awareness & practical privacy protection tips for employees in and out of the workplace, internet privacy and cybercrimes and how they are committed
- (b) Created & published Customer Privacy Policy & website Policy
- (c) Appointed an Information Officer, Operator's & Sub-Operators who have a written agreement as to their roles and responsibilities.
- (d) Established a database of all personal information of clients, vendors, service providers
- (e) Shredded any physical documents that no longer needed and that contains sensitive employee information (regulated by SAICA Guide on the Retention of Records)
- (f) Established company best practices for the sharing of personal information via email, postal service, telephonically, electronic device, person-to-person & implemented social media & sms (Short Message Service) rules
- (g) Engaged with our IT and website service providers to ensure that they are providing us with the best security for our data
- (h) Restricted who has access to private information on the company network and the cloud, using encryption
- (i) Implemented a plan for all processing of personal information, including
  - i. Protecting and safeguarding personal information when processed
  - ii. Regulating the way personal protection is processed
  - iii. Establishing a means to protect individuals from unauthorised access to or processing of personal information
  - iv. Identify recourse to remedy the unlawful processing of personal information

### 9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

- 9.1.1 on <http://techedge.co.za/>;
  - 9.1.2 head office of Winches and Winders (Pty) Ltd for public inspection during normal business hours;
  - 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
  - 9.1.4 to the Information Regulator upon request.
- 9.2 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.

## **10. UPDATING OF THE MANUAL**

The head of Winches and Winders (Pty) Ltd will on a regular basis update this manual.

*Issued by*

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**MRS BARBARA MOORE**  
**DIRECTOR**