



PROMOTION OF ACCESS ACT

Manual

SpecCon Holdings (Pty) Ltd

Promotion of Access to Information Act Manual (PAIA)

This manual has been prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 and to address the requirements of the Protection of Personal Information Act 4 of 2013.

Classification: Public

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POPIA Compliance

The Protection of Personal Information Act (POPIA) is South Africa's data protection law. SpecCon Holdings (Pty) Ltd complies with "the act" and has put in place a regulated Policy for the protection of data. Our appointed POPIA officer is a registered information officer with the regulator. None of the staff and client information listed in these documents may be used without our written consent. None of our staff may be contacted without our written consent.

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Version History and Approvals

Date	Version	Document Author/ Reviser
April 2026	2	Hettie Mills

List of Abbreviations and Definitions

Acronym	Descriptions
Client	Any natural or juristic person that received or receives services from the Company
Company	SpecCon Holdings (Pty) Ltd
Conditions for Lawful Processing	The conditions for the lawful processing of Personal Information as fully set out in Chapter 3 of POPI and in paragraph 12 of this Manual
Data Subject	The person to whom personal information relates
EXCO	Executive Committee
Information Officer	The individual who is identified in paragraph 3 of this Manual
Manual	This manual
PAIA	The Promotion of Access to Information Act 2 of 2000
Personal Information	Information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including but not limited to: a. Race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth b. Education, medical, financial, criminal or employment history c. Identifying number, symbol, email, address, telephone number, location or online identifier d. Biometric information e. Personal opinions, views or preferences f. Private or confidential correspondence g. Views or opinions of another individual about the person h. Name when linked with other personal information
Personnel	Any person who works for or provides services to or on behalf of the Company and receives or is entitled to remuneration,

	including directors, permanent, temporary, part-time staff and contract workers
POPI	The Protection of Personal Information Act 4 of 2013
POPI Regulations	Regulations promulgated in terms of section 112(2) of POPI
Private Body	a. A natural person carrying on a trade, business or profession in that capacity b. A partnership carrying on a trade, business or profession c. Any former or existing juristic person, excluding a public body
Processing	Any operation or activity concerning personal information, including a. Collection, recording, storage, updating, retrieval, use b. Dissemination by transmission or distribution c. Merging, linking, restriction, erasure or destruction
SAHRC	South African Human Rights Commission
SpecCon Holdings (Pty) Ltd	The Company

Any other terms not described herein will have the meaning as ascribed to it in terms of PAIA or POPI.

1 INTRODUCTION

- 1.1 For POPI and PAIA, the Company is defined as a private body. In accordance with the Company's obligations in terms of POPI and PAIA, the Company has produced this manual.
- 1.2 This manual sets out all information required by both PAIA and POPI.
- 1.3 This manual also deals with how requests are to be made in terms of PAIA.
- 1.4 This manual also establishes how compliance with POPI is to be achieved.

2 CONTACT DETAILS

Business Name	SpecCon Holdings (Pty) Ltd
Registration Number	2013/101544/07
Registered Office	Midlands Office Park, Suite W003 & W004, 1 Mount Quray Str Midstream 1692
Postal Address	Midlands Office Park, Suite W003 & W004, 1 Mount Quray Str Midstream 1692
Contact Number	+27 (0) 82 855 0750 +27 (0) 12 667 4962
CEO	Heinrich van der Westhuizen
Information Officer	Hettie Mills
Admin Officer	Lynne Jones
Email address	info@speccon.co.za
Web Page:	www.speccon.co.za

3 GUIDE OF SAHRC

- 3.1 A guide to PAIA and how to access information in terms of PAIA has been published pursuant to section 10 of PAIA.
- 3.2 The guide contains information required by an individual who may wish to exercise their rights in terms of PAIA.
- 3.3 Should you wish to access the guide you may request a copy from the Information Officer by submitting **ANNEXURE "A"**, attached hereto, to the details specified above.
- 3.4 You may also inspect the guide at the Company's offices during ordinary working hours.
- 3.5 You may also request a copy of the guide from Information Regulator at the following details

3.1 INFORMATION REGULATOR

Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone:	(010) 023 5200
Website:	www.inforegulator.org.za
Email:	PAIAComplaints@inforegulator.org.za

4 LATEST NOTICES IN TERMS OF SECTION 52(2) OF PAIA

At this stage no Notice(s) has / have been published on the categories of records that are available without having to request access to them in terms of PAIA.

5 AVAILABILITY OF CERTAIN RECORDS IN TERMS OF PAIA

- The Company holds and/or process the following records for the purposes of PAIA and POPI.
- The following records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

5.1 Products and/or Services

- All products and/or services are available freely on the Company' website as set out above.

5.2 Human Resources

- Employment Contracts.
- Employee benefits.
- Personnel records and correspondence.
- Training records.
- Internal policies.
- Information pertaining to share options, share incentives, bonus or profit-sharing agreements of each employee.
- Pension and provident fund records.

5.3 Legal

- Agreements with Clients.
- Agreement with Suppliers.
- Shareholder agreements.
- Partnership agreements.
- Licenses and Permits.
- Power of Attorneys.
- Sale agreements.
- Lease agreements.

5.4 Company Secretarial

- Memorandum of Incorporation.
- Secretarial records.
- Tradename and Trademark registrations.
- Company registration documents.
- Statutory registers.
- Minutes of Shareholder's meetings.
- Minutes of Director's meetings.
- Register of Directors.
- Share Certificates.

5.5 Financial

- Accounting records.
- Annual reports.
- Interim reports.
- Auditor details and reports.
- Tax returns.
- Insurance records.

5.6 Client

- Client database.
- Correspondence with Clients.

- Documentation prepared for Clients.
- Invoices, receipts, credit and debit notes.

5.7 Marketing

- Published Marketing material.

5.8 Miscellaneous

- Internal Correspondence.
- Information technology records.
- Trade secrets.
- Domain name registrations.
- Website information.
- Asset registers.
- Title deeds.

6 RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

6.1 The Company may be in possession of records in terms of the following legislation as and when applicable:

- Basic Conditions of Employment Act, No. 75 of 1997.
- Companies Act, No. 71 of 2008.
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993.
- Competition Act, No. 89 of 1998.
- Constitution of the Republic of South Africa Act, No. 108 of 1996.
- Credit Agreement Act, No. 75 of 1980.
- The Criminal Procedure Act, No. 51 of 1977.
- Debt Collectors Act, No. 114 of 1998.
- Deed Registries Act, No. 47 of 1937.
- Employment Equity Act, No. 55 of 1998.
- Financial Intelligence Centre Act, No. 38 of 2001.
- Identification Act, No. 68 of 1997.

- National Credit Act, No. 34 of 2005.
- Insolvency Act, No. 24 of 1936.
- Inspection of Financial Institutions Act, No. 18 of 1998.
- The Labour Relations Act, No. 66 of 1995.
- The Long-Term Insurance Act, No. 52 of 1998.
- Pension Funds Act, No. 24 of 1956.
- Short Term Insurance Act, No. 53 of 1998.
- Skills Development Levies Act, No. 9 of 1999.
- Unemployment Insurance Act, No. 63 of 2001.
- Unit Trust Control Act, No. 54 of 1981.
- Value Added Tax Act, No. 89 of 1991.
- Electronic Communication and Transactions Act, No. 25 of 2002.
- Financial Advisory and Intermediary Service Act, No. 37 of 2002.
- Patents, Designs and Copyright Merchandise Marks Act, No. 17 of 1941.
- Income Tax Act, No. 58 of 1962.
- Occupational Health and Safety Act No. 85 of 1993.
- Co-operatives Act No. 14 of 2005.
- Customs and Excise Act No. 91 of 1964.
- Insider Trading Act No. 135 of 1998.
- Prevention of Organised Crime Act No. 121 of 1998.
- Road Transportation Act No. 74 of 1977.
- Stock Exchanges Control Act No. 54 of 1995.
- Transfer Duty Act No. 40 of 1949.
- Machinery and Occupational Safety Amendment Act No. 181 of 1993.
- National Payment Systems Act No. 78 of 1998.
- National Water Act No. 36 of 1998.
- Prescription Act No. 68 of 1969.
- Trademark Act No. 194 of 1993.
- Intellectual Property Laws Amendment Act No.38 of 1997.
- Financial Markets Act No. 19 of 2012.

*Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

7 REQUEST PROCESS

- 7.1 An individual who wishes to place a request must comply with all the procedures laid down in PAIA.
- 7.2 The requester must complete **ANNEXURE "B"**, which is attached hereto and submit it to the Information Officer at the details specified above.
- 7.3 The prescribed form must be submitted 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 as is stated herein.
- 7.4 The prescribed form must be completed with enough particularity to enable the information officer to determine:
- The record(s) requested.
 - The identity of the requestor.
 - What form of access is required.
 - The Postal address or fax number of the requestor
- 7.5 The requestor must state that the records are required for the requestor to exercise or protect a right and clearly state what the nature of the right is so to be exercised or protected. An explanation of why the records requested is required to exercise or protect the right.

- 7.6 The request for access will be dealt with within 30 (thirty) days from date of receipt, unless the requestor has set out special grounds that satisfies the Information Officer that the request be dealt with sooner.
- 7.7 The period of 30 (thirty) days may be extended by not more than 30 (thirty) additional days, if the request is for a large quantity of information, or the request requires a search for information held at another office of the Company and the information cannot be reasonably obtained within 30 (thirty) days. The information officer will notify the requestor in writing should an extension be necessary.
- 7.8 The requestor will be informed in writing whether access to the records have been granted or denied. If the requestor requires a reason for the decision the request must be expressed in the prescribed form, the requestor must be further stated what particulars of the reasoning the requestor requires.
- 7.9 If a requestor has requested the records on another individual's behalf, the requestor must submit proof of the capacity the requestor submits the request in, to the satisfaction of the information officer.
- 7.10 Should the requestor have any difficulty with the form or the process laid out herein, the requestor should contact the Information Officer for assistance.
- 7.11 An oral request can be made to the Information Officer should the requestor be unable to complete the form due to illiteracy or a disability. The Information Officer will complete the form on behalf of the requestor and provide a copy of the form to the requestor.

8 GROUNDS FOR REFUSAL

- 8.1 The following are grounds upon which the Company may, subject to the exceptions in Chapter 4 of PAIA, refuse a request for access in accordance with Chapter 4 of PAIA:
- a) Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable.

- b) Mandatory protection of the commercial information of a third party, if the Records contain:
 - o Trade secrets of that third party.
 - o Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party.
 - o Information disclosed in confidence by a third party to the Company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
- 8.2 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 8.3 Mandatory protection of the safety of individuals and the protection of property.
- 8.4 Mandatory protection of Records that would be regarded as privileged in legal proceedings.
- 8.5 Protection of the commercial information of the Company, which may include:
 - Trade secrets:
 - o Financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Company.
 - o Information which, if disclosed, could put the Company at a disadvantage in contractual or other negotiations or prejudice the Company in commercial competition.
 - o Computer programs which are owned by the Company, and which are protected by copyright and intellectual property laws.
- 8.6 Research information of the Company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage.

- 8.7 Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

9 REMEDIES SHOULD A REQUEST BE REFUSED

- 9.1 The Company does not have an internal appeal procedure considering a denial of a request, decisions made by the information officer is final.
- 9.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 days of notification of the decision for appropriate relief.

10 FEES

The following fees shall be payable upon request by a requestor:

Request	Fee
Request fee (payable on every request)	R 140-00
Photocopy of an A4 page or part thereof	R 2-00
Printed copy of an A4 page or part thereof	R 2-00
Hard copy on flash drive (flash drive to be provided by requestor)	R 40-00
Hard copy on a compact disc (compact disc to be provided by requestor)	R 40-00
Hard copy on a compact disc (compact disc to be provided by the Company)	R 60-00
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record per A4 page	R 24-00
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R 40-00
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R 40-00
Copy of an audio on a compact disc (compact disc to be provided by the Company)	R 60-00

Request	Fee
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	R 145-00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)	R 435-00
Postage, email or any other electronic transfer	Actual expense, if any.

11 POPI

11.1 Conditions for lawful processing:

- POPI has eight conditions for lawful processing and includes:
 - o Accountability.
 - o Processing limitation.
 - o Purpose specification.
 - o Further processing limitation.
 - o Information quality.
 - o Openness.
 - o Security safeguards.
 - o Data subject participation.

11.2 The Company is involved in the following types of processing:

- Collection.
- Recording.
- Organization.
- Structuring.
- Storage.
- Adaptation or alteration.
- Retrieval.
- Consultation.
- Use.
- Disclosure by transmission.

- Dissemination or otherwise making available.
- Alignment or combination.
- Restriction.
- Erasure.
- Destruction.

11.3 The Company processes information for the following purposes:

- To fulfil agreements in relation to its employees.
- To provide services to its clients in accordance with terms agreed to by the Clients.
- To undertake activities related to the provision of services, such as.
- To fulfil domestic legal, regulatory and compliance requirements.
- To verify the identity of Customer representatives who contact the Company or may be contacted by the Company.
- For risk assessment, information security management, statistical, trend analysis and planning purposes.
- To monitor and record calls and electronic communications with the Client for quality, training, investigation and fraud prevention purposes.
- To enforce or defend the Company or the Company affiliates' rights.
- To manage the Company's relationship with its clients, which may include providing information to its clients and its clients affiliates about the Company' and the Company affiliates' products and services.

11.4 The purposes related to any authorised disclosure made in terms of agreement, law or regulation:

- Any additional purposes expressly authorised by the Company' client.
- Any additional purposes as may be notified to the Client or Data Subjects in any notice provided by the Company.

11.5 The Company processes personal information the following categories of Data Subjects:

- Juristic persons.
- Corporate clients.
- Suppliers.
- Natural persons.

- Individuals.
- Staff.
- Clients.
- Suppliers.

11.6 The Company process the following categories personal information:

- Client profile information.
- Bank account details.
- Payment information.
- Client representatives.
- Names.
- Email Addresses.
- Telephone number.
- Facsimile numbers.
- Physical addresses.
- Tax numbers.
- Identity Numbers.
- Passport Numbers.

11.7 Recipients of Personal Information:

- The Company, the Company's affiliates, their respective representatives
- When making authorised disclosures or transfers of personal information in terms of Section 72 of POPI, personal information may be disclosed to recipients in countries that do not have the same level of protection for personal information as South Africa does.

11.8 The following Security measures are implemented by the Company:

- The Company implements numerous Security measures to protect personal information that is stored electronically and physically.
- The Company ensures that appropriate security measures are taken and updates these measures on a regular basis.
- The Company have also implemented various policies for additional security for personal information stored both physically and electronically.

- 11.9 The personal information that is stored physically is protected as follows:
- Where physical records of the data exist, such records will be stored in a secure area that can be 'locked-away' as to avoid a breach of the personal information.
 - Such physical data records will be 'locked-away' and secured when not in use.
 - The Company may share personal information with third parties and in certain instances this may result in cross border flow of the personal information. The personal information will always be subject to protection, not less than the protection it is afforded under the Protection of Personal Information Act No.4 of 2013.
- 11.10 Objection to the processing of personal information by a data subject:
- Section 11(3) of POPI and regulation 2 of the POPI regulations provides that a data subject may, at any time object to the processing of their personal information in the prescribed form attached to this manual as **ANNEXURE "C"**.
- 11.11 Request for correction or deletion of personal information:
- Section 24 of POPI and regulation 3 of the POPI regulations provides that a data subject may request for their personal information to be corrected and/or deleted in the prescribed form attached hereto as **ANNEXURE "D"**.
 - Regulation 8 of the POPI regulations provides for requests the outcomes of requests and of fees payable in the prescribed form attached hereto as **ANNEXURE "E"**.

12 PERSONAL DATA HANDLING SPEC CON GROUP OF COMPANIES

SpecCon Holdings (Pty) Ltd, including all subsidiaries and affiliates within the SpecCon Group, is committed to the protection of personal information in accordance with the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA). As a leading provider of accredited training, learnerships, and e-learning solutions, SpecCon processes a significant volume of personal information belonging to learners, corporate clients, employees, and service providers.

Listed below is the PAIA Modules implemented into SpecCon Holdings (Pty) Ltd.

12.1 Module 1 - Defining Personal Information in the Training Environment

12.1.1 At SpecCon, personal information is actively processed as part of delivering accredited training, learnerships, and digital learning solutions.

12.1.2 Personal information processed by SpecCon includes, but is not limited to:

- **Learner Information:** Names, identity numbers, contact details, demographic information required for SETA reporting, academic records, assessment outcomes, and certification data.
- **Client Information:** Company registration details, VAT numbers, authorized representatives, and contractual documentation
- **Employee Information:** Payroll data, tax information, employment records, and performance-related information
- **Digital Information:** Login credentials, IP addresses, system activity logs, and LMS usage data

12.1.3 All personal information processed by SpecCon is linked to operational requirements and service delivery.

12.2 Module 2: Principles of Lawful Processing and Online Behaviour

12.2.1 SpecCon processes personal information in accordance with the eight conditions for lawful processing as required by POPIA.

12.2.2 In practice, this means:

- Personal information is **collected only where necessary** for defined operational purposes.
- Processing activities are **aligned with contractual, legal, and regulatory requirements**.
- Information collected is **relevant, accurate, and limited to what is required**.
- Data subjects are **informed of processing activities where required**.
- Processing activities are **documented and controlled internally**.

12.2.3 SpecCon ensures that all departments managing personal information apply these principles consistently in their day-to-day operations.

12.3 Module 3: Data Retention and Disposal

12.3.1 SpecCon retains personal information only for as long as required to fulfil:

- Training and certification obligations.
 - SETA and regulatory reporting requirements.
 - Contractual obligations with clients and partners.
 - Legal and compliance requirements.
- 12.3.2 Retention periods are determined based on applicable legislation and operational needs.
- 12.3.3 Once information is no longer required:
- Records are securely destroyed, deleted, or de-identified.
 - Physical documents are disposed of in a controlled manner.
 - Electronic records are permanently removed from systems where applicable.
- 12.3.4 SpecCon ensures that retained data remains protected throughout its lifecycle.

12.4 Module 4: Information Security Measures

- 12.4.1 SpecCon implements and maintains appropriate technical and organizational measures to safeguard personal information.
- 12.4.2 These measures include:
- **Access Control:** Access to personal information is restricted to authorized personnel based on role and responsibility.
 - **System Security:** Learning platforms and internal systems are protected through secure authentication and controlled access.
 - **Physical Security:** Hard copy records are stored in secured environments with restricted access.
 - **Monitoring:** System usage and access to information are monitored where necessary.
 - **Incident Management:** Procedures are in place to identify, assess, and respond to potential data breaches.
- 12.4.3 Security measures are reviewed periodically to ensure continued effectiveness.

12.5 Module 5: Data Subjects & Device Security

- 12.5.1 SpecCon recognises and facilitates the rights of all data subjects whose information is processed.
- 12.5.2 In practice:
- Data subjects may request access to their personal information.

- Requests for correction, deletion, or restriction are processed in accordance with legal requirements.
 - Objections to processing are assessed and implemented where applicable.
 - Data subjects may lodge complaints with the Information Regulator if required.
- 12.5.3 All such requests are managed through defined internal processes to ensure compliance and consistency.

12.6 Module 6: Data Breaches Management

- 12.6.1 SpecCon maintains procedures to manage data breaches effectively.
- 12.6.2 Where a breach occurs:
- The incident is identified and contained as soon as possible.
 - The scope and impact of the breach are assessed internally.
 - Affected systems and data are secured to prevent further exposure.
 - Notifications are made to the Information Regulator and affected data subjects, where required by law.
- 12.6.3 All incidents are documented and reviewed to improve future controls.

12.7 Module 7: Children's Privacy

- 12.7.1 SpecCon processes personal information relating to learners, which may include minors.
- 12.7.2 In such cases:
- Processing is conducted in accordance with POPIA requirements for children's information.
 - Information is collected and used **only for training and compliance purposes.**
 - Appropriate safeguards are implemented to **protect the privacy and security of minors.**
 - Where required, **consent is obtained from a competent person.**

12.8 Module 8: Privacy Rights Awareness

- 12.8.1 SpecCon ensures that employees and relevant stakeholders are aware of privacy obligations.

12.8.2 This is achieved through:

- Internal policies and procedures.
- Ongoing communication and awareness initiatives.
- Defined processes for handling personal information.

12.8.3 Privacy awareness forms part of operational responsibility across all departments.

12.9 Module 9: Cybersecurity and Privacy

12.9.1 SpecCon incorporates cybersecurity controls into its operations to protect personal information.

12.9.2 These include:

- Use of secure systems and platforms.
- Controlled access to networks and data.
- Regular system updates and maintenance.
- Monitoring for unauthorized access or suspicious activity.

12.9.3 Employees are expected to adhere to internal security protocols when handling company systems and data.

12.10 Module 10: The Risks of Data Profiling

12.10.1 SpecCon does not engage in unlawful or intrusive data profiling practices.

12.10.2 Where data is analyzed:

- It is done for **legitimate business purposes**, such as improving delivery service or reporting.
- Processing is conducted in a **lawful and transparent manner**.
- Personal information is **not used in a way that unfairly impacts data subjects**.

12.11 Module 11: Digital Footprint Management

12.11.1 SpecCon recognizes that digital platforms form part of its service delivery.

12.11.2 Accordingly:

- Systems are managed to limit unnecessary data exposure.
- Information shared through platforms is controlled and monitored.
- Users are provided with secure access to systems.

12.12 Module 12: Communication Security

12.12.1 SpecCon ensures that communication involving personal information is conducted securely.

12.12.2 This includes:

- Use of controlled communication channels.
- Protection of sensitive information during transmission.
- Limiting access to authorized recipients only.

12.13 Module 13: Emerging Privacy Threats

12.13.1 SpecCon monitors developments in technology and privacy risks.

12.13.2 Where new risks are identified:

- Internal controls are reviewed and updated.
- Processing practices are adjusted where required.
- Additional safeguards are implemented to maintain compliance.

13 IMPLEMENTATION AND ENFORCEMENT

The outlined rules and procedures in this document are implementation and enforced on the date of the final signature. It is the responsibility of learners to familiarise themselves with company policies.

14 SIGNATURE OF APPROVAL

Hein van der Westhuizen
CEO
Date

Lynne Jones
HR
Date

Hettie Mills
Compliance
Date

End of Policy

APPENDIX A – FORM 1 (REG 3)

REQUEST FOR A COPY OF THE GUIDE (REGULATION 3)

APPENDIX B – FORM 2 (REG 7)

REQUEST FOR ACCESS TO RECORD (REGULATION 7)

APPENDIX C – FORM 1 (REG 2.1)

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

APPENDIX D – FORM 2 (REG 3.2)

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APPENDIX E – FORM 3 (REG 8)

OUTCOME OF REQUEST AND FEES PAYABLE

APPENDIX – F

PAIA MANUAL COMPLIANCE

15 PAIA MANUAL COMPLIANCE

No	Regulation/ Question	Compliant	
		Yes	No
1	Has the information officer or head of the organisation compiled a PAIA Manual?	☒	
2	Does the PAIA Manual of the organisation contain key contact details (the postal and street address, phone and fax number and, if available, electronic mail address) of the head of the body and of every deputy information officer of the body designated and/or delegated in terms of section 56 of POPIA and 17 of PAIA?	☒	
3	Does the PAIA Manual of the organisation contain a description of the PAIA Guide, as developed by the Regulator and how to obtain access to the guide?	☒	
4	Does the PAIA Manual of the organisation contain the latest notice, if any, regarding the categories of record of the body which are available without a person having to request access in terms of PAIA?	☒	
5	Does the PAIA Manual of the organisation contain description of the records of the body which are available in accordance with any other legislation?	☒	
6	Does the PAIA Manual of the organisation contain description of the subjects on which the body holds records and the categories of records held on each subject?	☒	

16 PROCESSING OF PERSONAL INFORMATION

No	Regulation/ Question	Compliant	
		Yes	No
1	Does the Manual describe the purpose or reasons for processing personal information in your organisation?	☒	
2	Does the Manual specify the categories of data subject in which the body processes their personal information and the nature of the personal information being processed?	☒	
3	Does the Manual specify the person or category of persons who the body may disseminate personal information?	☒	
4	Does the Manual specify if the body has planned transborder flows of personal information?	☒	
5	Does the manual specify the nature of the technology used to ensure the suitable and optimum security, confidentiality, integrity and availability of the personal information under the care of the body?	☒	

17 AVAILABILITY OF PAIA MANUAL

No	Regulation/ Question	Compliant	
		Yes	No
1	Is the PAIA Manual of the organisation available, as prescribed in section 51(3)(a) and (b) of PAIA?	☒	
2	Is it available on the website, if any, of the organisation?		☒
3	Is it available at the principal place of business of the organisation for public inspection during normal business hours?	☒	
4	Has it been uploaded on the Regulator eServices portal?		

18 NOTICE OF CATEGORIES

RECORDS THAT ARE AUTOMATICALLY AVAILABLE WITHOUT A REQUEST HAVING THE REQUEST ACCESS THERETO

No	Regulation/ Question	Compliant	
		Yes	No
1	Does the organisation have a notice of categories of records that are automatically available?	☒	
2	Is the notice made available, as prescribed in Regulation 5(2)(b) to the Regulator by uploading it on the eServices portal?	☒	
3	Is the notice made available, as prescribed in Regulation 5(2)(b) on the website of the organisation?	☒	
4	Is the notice made available, as prescribed in Regulation 5(2)(b) for inspection, at the registered head office of the organisation during normal office hours?	☒	

19 DESIGNATION AND DELEGATION

DEPUTY INFORMATION OFFICER (SECTION 56 OF POPIA AND SECTION 17(1) AND SECTION 17(3) OF PAIA)

No	Regulation/ Question	Compliant	
		Yes	No
1	Has the Information Officer or any person duly authorised by that leader designated and/or delegated any Deputy Information Officer(s)?	☒	
2	Has the Information Officer, in writing, authorised any person as Information Officer of the organisation?	☒	

20 ANNUAL REPORT IN TERMS OF SECTION 32 OF PAIA

No	Regulation/ Question	Compliant	
		Yes	No
1	Has the Information Officer submitted its Annual Report to the Regulator, in the previous financial year?	☒	

21 AVAILABILITY OF A COPY OF THE PAIA GUIDE (PAIA REGULATION 3(1))

No	Regulation/ Question	Compliant	
		Yes	No
1	Has the Information Officer made available a copy of the PAIA Guide, in at least two (2) of the official languages, at his or her registered head office, for public inspection during normal office hours? - PAIA Regulation 3(1)	☒	

22 PERSONAL DATA HANDLING

No	Regulation/ Question	Compliant	
		Yes	No
1	Do you only collect and keep the personal data you truly need?	☒	
2	Do you regularly check and delete personal data you no longer need?	☒	
3	Do you make sure the personal data you have is accurate and up to date?	☒	
4	Do you store personal data securely to prevent unauthorised access?	☒	
5	Do you use strong passwords and encryption to protect personal data?	☒	
6	Are you vigilant against phishing attacks?	☒	
7	Do you regularly review and update your contact lists to remove unnecessary personal data?	☒	

23 ONLINE BEHAVIOUR

No	Regulation/ Question	Compliant	
		Yes	No
1	Do you regularly review and update the privacy settings on your online accounts?	☒	
2	Are you careful about sharing personal information online, especially on public forums?	☒	
3	Do you avoid using public Wi-Fi for sensitive transactions?	☒	
4	Do you use multi-factor authentication (MFA) for your online accounts?	☒	

No	Regulation/ Question	Compliant	
		Yes	No
5	Do you use strong, unique passwords for each of your online accounts?	☒	
6	Do you regularly monitor your online accounts for suspicious activity?	☒	

24 SOCIAL MEDIA USAGE

No	Regulation/ Question	Compliant	
		Yes	No
1	Do you think before posting information about others on social media?	☒	
2	Do you avoid posting sensitive personal information about yourself or others?	☒	
3	Do you avoid posting pictures and videos of other people on social media without their consent?	☒	
4	Do you verify information before sharing it online to avoid spreading misinformation?	☒	
5	Do you review and manage your social media privacy settings regularly?	☒	
6	Do you limit the visibility of your social media posts to friends and family?	☒	
7	Do you use privacy settings to control who can see your location information on social media?	☒	

25 SHARING INFORMATION

No	Regulation/ Question	Compliant	
		Yes	No
1	Do you get consent before sharing someone else's personal data with third parties?	☒	
2	Do you know what to do in case of a data breach involving personal information you control?	☒	
3	Do you avoid sharing personal data over unsecured channels like SMS or non-encrypted emails?	☒	
4	Do you understand the implications of sharing personal data on social media platforms?	☒	
5	Do you carefully review privacy policies before sharing personal data with apps and websites?	☒	

26 DEVICE SECURITY

No	Regulation/ Question	Compliant	
		Yes	No
1	Do you keep your phone and PC operating systems up to date with the latest security patches?	☒	
2	Do you ensure all your apps are updated as soon as new updates are available?	☒	
3	Do you use antivirus and anti-malware software on your devices?	☒	
4	Do you regularly back up important personal data?	☒	
5	Do you avoid downloading apps or software from untrusted sources?	☒	
6	Do you use biometric authentication (like fingerprint and facial recognition) to protect your devices?	☒	
7	Do you have a backup plan for your mobile device in case it is lost or stolen?	☒	

27 DATA BREACHES

No	Regulation/ Question	Compliant	
		Yes	No
1	Do you know what steps to take if you suspect you have been a victim of identity theft or fraud?	☒	
2	Do you regularly monitor your credit report for signs of identity theft?	☒	

28 CHILDREN PRIVACY

No	Regulation/ Question	Compliant	
		Yes	No
1	Do you have age-appropriate privacy settings for your children's online accounts? (If you don't have children, answer how you would if you did.)	☒	
2	Do you discuss online safety and privacy with your children? (If you don't have children, answer how you would if you did.)	☒	

29 PRIVACY RIGHTS AWARENESS

No	Regulation/ Question	Compliant	
		Yes	No
1	Are you aware that people have the right to access their personal data held by others?	☒	
2	Do you know that people can request correction of inaccurate personal data?	☒	

No	Regulation/ Question	Compliant	
		Yes	No
3	Are you aware that people can object to the processing of their personal data in certain circumstances?	☒	
4	Do you know your rights if your personal data is misused?	☒	

SpecCon Holdings (Pty) Ltd

FORM 1

REQUEST FOR A COPY OF THE GUIDE

[Regulations 3]

To: Information Officer

Full Names:	
In my capacity as (mark with "x"):	
Name of *public/private body (if applicable)	
Postal Address:	
Street Address:	
E-mail address:	
Facsimile:	
Contact numbers:	

Hereby request the following copy(ies) of the guide:

Language (mark with "X")		No of copies	Language (mark with "X")		No of copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			isiXhosa	
	isiZulu				

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

SpecCon Holdings (Pty) Ltd

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

Note:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form

To: Information Officer

Reference number:

(Address)

E-mail address: _____

Fax number: _____

Mark with an "X"

☐

Request is made in my own name.

☐

Request is made on behalf of another person.

PERSONAL INFORMATION	
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	Tel. (B):		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				
Street Address				
E-mail address:				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular			
PARTICULARS OF RECORD REQUESTED <i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>				
Description of record or relevant part of the record:				
Reference number, if available				
Any further particulars of record				
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>				
Record is in written or printed 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 in an electronic, or machine-readable form				

FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
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 <i>(Mark the applicable box with an "X")</i>	
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)	
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 If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.	
Indicate which right is to be exercised or protected	

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

FEES	
a) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. 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	

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 (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

SpecCon Holdings (Pty) Ltd

FORM 1

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)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 2(1)]

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.

Reference number: _____

A	DETAILS OF THE DATA SUBJECT	
Name and surname of data subject:		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		

B	DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (if the responsible party is a natural person):		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		
Name of public or private body (if the responsible party is not a natural person):		
Business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		

C	REASONS FOR OBJECTION (Please provide detailed reasons for the objection)

Signed at _____ this _____ day of _____ 20 _____

Signature of data subject (applicant)

SpecCon Holdings (Pty) Ltd

FORM 2

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)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 3(2)]

Note:

1. Affidavits or other documentary evidence in support of the request 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.

Reference number: _____

Mark the appropriate box with an "x".

Request for:

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

A	DETAILS OF THE DATA SUBJECT
Surname	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number:	
E-mail address:	

B	DETAILS OF RESPONSIBLE PARTY	
Name and surname of responsible party (if the responsible party is a natural person):		
Residential, postal or business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		
Name of public or private body (if the responsible party is not a natural person):		
Business address:		
	Code ()	
Contact number(s):		
Fax number:		
E-mail address:		

C	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY. (Please provide detailed reasons for the request)

* Delete whichever is not applicable.

Signed at _____ this _____ day of _____ 20 _____

Signature of Data subject

SpecCon Holdings (Pty) Ltd

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

1. If your request is granted the—
 (a) amount of the deposit, (if any), is payable before your request is processed; and
 (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

To: _____

Reference number: _____

Your request dated _____, refers.

1. You requested:

Personal inspection of information 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) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
--	--

OR

2. You requested:

Printed copies of the information (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 information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive(including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

3. You requested:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language: (<i>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</i>)	

Kindly note that your request has been:

☐

Approved

☐

Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on: i) Flash drive • To be provided by requestor ii) Compact disc • If provided by requestor • If provided to the requestor			
For a transcription of visual images per A4-size page			
Copy of visual images			
Transcription of an audio record, per A4-size			
Copy of an audio record i) Flash drive • To be provided by requestor ii) Compact disc • If provided by requestor • If provided to the requestor			
Postage, e-mail or any other electronic transfer:			
Total:			

5. Deposit payable (if search exceeds six hours):

☐

Yes

☐

No

Hours of search		Amount of deposit (<i>calculated on one third of total amount per request</i>)	
-----------------	--	--	--

The amount must be paid into the following bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer