

PROMOTION OF ACCESS TO INFORMATION 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.
This manual applies to SpecCon Holdings (Pty) Ltd, its South African subsidiaries and their divisions (collectively referred to in this manual as "SpecCon").

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List of Abbreviations and Definitions

Acronym	Descriptions
Child	A natural person under the age of 18 who is not legally competent, without the assistance of a competent person, to take any action or decision about any matter concerning themselves.
Client	Any natural or juristic person that received or receives services from the Company.
Conditions for Lawful Processing	The conditions for the lawful processing of personal information are set out in Chapter 3 of POPIA.
Data Subject	The person to whom personal information relates.
Deputy Information Officer	A person designated as deputy information officer under section 56 of POPIA read with section 17 of PAIA, identified in paragraph 2 of this Manual.
Guide	The guide on how to use PAIA, published by the Information Regulator under section 10 of PAIA.

Acronym	Descriptions
Information Officer	The information officer of SpecCon, being the head of SpecCon as defined in section 1 of PAIA (see the definition of "information officer" in section 1 of POPIA), as registered with the Information Regulator and identified in paragraph 2 of this Manual.
Information Regulator	The Information Regulator established under section 39 of POPIA.
Manual	This manual.
Operator	A person who processes personal information for SpecCon under a contract or mandate, without coming under SpecCon's direct authority.
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.
Personal Requester	A requester who asks for access to a record containing personal information about themselves.
Personnel	Any person who works for or provides services to or on behalf of the Company receives or is entitled to remuneration, including directors, permanent, temporary, part-time staff and contract workers.
POPIA	The Protection of Personal Information Act 4 of 2013.
POPIA Regulations	The regulations are made under section 112(2) of POPIA.
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.

Acronym	Descriptions
	b) Dissemination by transmission or distribution. c) Merging, linking, restriction, erasure or destruction.
Requester	A person who asks for access to a record under PAIA, or a person acting on their behalf.
Responsible Party	The person or body that decides the purpose of and means for processing personal information.
SpecCon or the Company	SpecCon Holdings (Pty) Ltd, registration number 2013/101544/07, its South African subsidiaries and their divisions listed in Part 1 of Annexure F.
Special Personal Information	Personal information about a person's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behavior.

Any other terms not defined here have the meaning given to them in PAIA or POPIA.

1 INTRODUCTION

SpecCon Holdings (Pty) Ltd and each of its South African subsidiaries is a private body under PAIA. This Manual is published under section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended by the Protection of Personal Information Act 4 of 2013 (POPIA).

1.1 Purpose of this Manual

This Manual:

- Explains how to ask for access to records that SpecCon holds.
- Describes the subjects on which SpecCon holds records and the categories of records held on each subject.
- Explains how to obtain the Information Regulator's Guide on how to use PAIA.
- Describes how SpecCon processes personal information, including the purposes, the people it holds information about, who receives it, information sent outside South Africa and the security measures in place.
- Explains the rights of data subjects under POPIA and how to exercise them.

1.2 Who this Manual covers

This Manual applies to SpecCon Holdings (Pty) Ltd, its South African subsidiaries and their divisions (collectively referred to in this Manual as "SpecCon"). The subsidiaries and divisions are listed in Part 1 of **Annexure F**.

Each company within SpecCon is a separate private body under PAIA and a separate responsible party under POPIA, and this Manual is published by the head of each of those companies under section 51 of PAIA. Part 1 of **Annexure F** sets out, for each company, its registration number, the name of its head, its Information Officer and Deputy Information Officer, each of whom is registered with the Information Regulator, and its contact details. A requester should state in the request which company holds the record, if known.

1.3 About SpecCon

SpecCon provides accredited training, learnerships, skills programmes and e-learning. It also runs digital platforms, including SpecCon Academy for school learners and Passport2Work for job seekers, and provides business software that client organisations use to manage their own information. SpecCon operates from its head office in Midstream and from learning centres in Centurion, Bellville (Cape Town) and Mbombela. Its brands, websites and learning centres are listed in **Annexure F**.

2 CONTACT DETAILS

Requests under PAIA and POPIA must be sent to the Information Officer, using the details below. The head, Information Officer and Deputy Information Officer of each subsidiary are listed in Part 1 of **Annexure F**. Requests relating to any SpecCon company or division may be sent to privacy@speccon.co.za.

Business name	SpecCon Holdings (Pty) Ltd
Registration number	2013/101544/07
Physical address	Midlands Office Park, Suites W003 and W004, 1 Mount Quray Street, Midstream, 1692
Postal address	Midlands Office Park, Suites W003 and W004, 1 Mount Quray Street, Midstream, 1692
Telephone	+27 (0)12 667 4962
Email for PAIA and POPIA requests	privacy@speccon.co.za
Website	www.speccon.co.za
Head of the private body	Heinrich van der Westhuizen, duly authorised by the Chief Executive Officer, Joe Niemand
Information Officer	Heinrich van der Westhuizen
Deputy Information Officer	Hettie Mills, Group Compliance privacy@speccon.co.za +27 (0)12 667 4962

The Deputy Information Officer is designated under section 56 of POPIA read with section 17 of PAIA, is registered with the Information Regulator, and deals with requests on behalf of the Information Officer.

3 THE INFORMATION REGULATOR'S GUIDE TO PAIA

The Information Regulator has published a Guide on how to use PAIA, as required by section 10 of PAIA. The Guide is available in English and other official languages. It explains, among other things:

- The purpose of PAIA and POPIA.
- How to ask for access to a record, and which form to use.
- The help available from the Information Officer of a body and from the Information Regulator.
- The remedies available, including complaints to the Information Regulator and applications to court.
- The fees payable for requests.

You can obtain the Guide:

- On the Information Regulator's website, www.inforegulator.org.za.
- From SpecCon's Information Officer, free of charge, by completing Form 1, Request for a Copy of the Guide (**Annexure A**).
- By inspecting it, free of charge, at SpecCon's office during normal business hours (08:00 to 16:00). SpecCon keeps a copy of the Guide in English and at least one other official language at its office, as regulation 3(1) of the PAIA Regulations requires.

3.1 Information Regulator contact details

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 · Toll-free 0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

4 RECORDS AVAILABLE WITHOUT A REQUEST

SpecCon has not published a notice under section 52(2) of PAIA on categories of records that are automatically available.

The following records are available without a formal request, on the website or from the Information Officer:

- Information about SpecCon's products and services.
- Published marketing material and brochures.
- This Manual and **Annexures A to F**.
- SpecCon's Privacy Notice and Cookie Policy.
- SpecCon's B-BBEE certificate and accreditation letters.

5 RECORDS HELD BY SPECCON

SpecCon holds records on the subjects below. Access to these records is not automatic: each request is considered under PAIA and may be refused on the grounds in paragraph 8 of this Manual.

5.1 Company secretarial

- Memorandum of Incorporation and company registration documents.
- Statutory registers, including the register of directors and the securities register.
- Minutes of shareholders' and directors' meetings.
- Share certificates.
- Board and committee resolutions.
- Codes of conduct and governance frameworks.
- Trade name and trademark registrations.

5.2 Financial and tax

- Accounting records and bank records.
- Annual financial statements and interim reports.

- Auditor's reports.
- Income tax, VAT, PAYE and skills development levy records.
- Insurance records.
- Debtors and creditors records.
- Learner stipend payment records.

5.3 Human resources

- Employment contracts and personnel records.
- Payroll, benefits, and pension and provident fund records.
- Leave, performance and disciplinary records.
- Staff training records.
- Employment Equity records and reports.
- Health and safety records.
- Internal policies.
- Attendance and access control records.
- Workplace skills plans and annual training reports.

5.4 Learners and training

- Applications for learnerships and other programmes.
- Learner enrolment and registration records.
- Learnership agreements.
- Attendance registers.
- Assessment, moderation and portfolio of evidence records.
- Certification and achievement records.
- Copies of identity documents and qualifications submitted by learners.
- Learner stipend and banking records.
- Records of learner registrations and uploads to SETA and QCTO systems.

5.5 Accreditation and regulatory reporting

- Accreditation records with SETAs and the QCTO.
- Reports submitted to SETAs, the QCTO and government departments.
- B-BBEE verification records.
- Programme and qualification approvals.
- Facilitator, assessor and moderator registrations.
- Quality management system records, and audit and monitoring reports.
- ISO certification records.

5.6 Clients and suppliers

- Client and supplier agreements.
- Contact details of client and supplier representatives.
- Correspondence.
- Quotations, invoices, receipts, and credit and debit notes.
- Documents prepared for clients.
- Service level agreements.
- Employment Equity, B-BBEE and skills development facilitator service records.
- Proposals, quotations and tender documents.
- Marketing material and campaigns, and consents to publish images and testimonials.
- Complaints and their resolution.

5.7 Digital platforms

- User accounts and profiles on SpecCon's learning and job platforms, including SpecCon Academy and Passport2Work.
- Learning progress and assessment results.
- CVs and job applications submitted through Passport2Work.
- System access and activity logs.

5.8 Legal

- Shareholder, partnership, lease and sale agreements.
- Licences and permits.
- Powers of attorney.
- Records of legal proceedings.

5.9 Information technology and other

- Information technology policies and records.
- Domain name registrations and website content.
- Asset registers.
- Title deeds.
- Internal correspondence.
- Software licence and support agreements.
- Security incident register.
- Backup and disaster recovery records.
- Supplier and operator agreements.
- CCTV footage and physical access control records.
- Telephone system records.
- Trade secrets and intellectual property.

6 RECORDS AVAILABLE UNDER OTHER LEGISLATION

Records of SpecCon may be available in accordance with the following legislation, to the extent that it applies to SpecCon (section 51(1)(d) of PAIA). Where legislation gives a person a right of access to a record, for example the right of shareholders and other persons to inspect company records under section 26 of the Companies Act, or the right of an employee to particulars of their remuneration under section 33 of the Basic Conditions of Employment Act, access may be obtained in terms of that legislation.

- Basic Conditions of Employment Act 75 of 1997.
- Broad-Based Black Economic Empowerment Act 53 of 2003.

- Companies Act 71 of 2008.
- Compensation for Occupational Injuries and Diseases Act 130 of 1993.
- Consumer Protection Act 68 of 2008.
- Copyright Act 98 of 1978.
- Deeds Registries Act 47 of 1937.
- Electronic Communications and Transactions Act 25 of 2002.
- Employment Equity Act 55 of 1998.
- Employment Services Act 4 of 2014.
- Income Tax Act 58 of 1962.
- Labour Relations Act 66 of 1995.
- National Credit Act 34 of 2005.
- National Qualifications Framework Act 67 of 2008.
- Occupational Health and Safety Act 85 of 1993.
- Protection of Personal Information Act 4 of 2013.
- Skills Development Act 97 of 1998.
- Skills Development Levies Act 9 of 1999.
- Tax Administration Act 28 of 2011.
- Trademarks Act 194 of 1993.
- Unemployment Insurance Act 63 of 2001.
- Unemployment Insurance Contributions Act 4 of 2002.
- Value-Added Tax Act 89 of 1991.

This list may not be complete. If you believe you have a right of access to a record under other legislation, please say so in your request.

7 HOW TO REQUEST ACCESS TO A RECORD

7.1 Making a request

- Complete Form 2, Request for Access to Record (**Annexure B**).
- Send it to the Information Officer by email to privacy@speccon.co.za, or by post or by hand to the addresses in paragraph 2 of this Manual.

- Attach proof of your identity. If you are asking on behalf of someone else, attach proof of your authority to do so.
- Describe the record in enough detail for the Information Officer to identify it and say in which form and language you want access (for example a copy by email, or inspection at our office).
- State which right you want to exercise or protect and explain why you need the record to exercise or protect that right.
- If you want to be told of the decision in another way as well as in writing, say how.

If you cannot complete the form because of illiteracy or a disability, you may make the request orally. The Information Officer will complete the form for you and give you a copy. The Information Officer will also help you if you have any difficulty with the form or the process.

7.2 Fees and payment

You must pay the request fee before your request is processed. The Information Officer will tell you, by notice, of the fee payable and of your right to lodge a complaint with the Information Regulator about the fee (section 54(1) and (3) of PAIA). A personal requester, who asks only for records about themselves, does not pay the request fee.

If access is granted, an access fee is payable for copies, transcriptions and the time reasonably needed to search for and prepare the record. If the search for and preparation of the record is likely to take more than six hours, you will be asked to pay a deposit of not more than one third of the access fee that would be payable if the request is granted (section 54(2) of PAIA). If the request is then refused, the deposit will be refunded (section 54(4)). SpecCon may withhold the record until the access fee has been paid (section 54(5)). The fees are set out in paragraph 10 of this Manual. Payment is made by electronic funds transfer to the account the Information Officer gives you.

7.3 Time to respond

The Information Officer will decide on your request within 30 days of receiving it (section 56 of PAIA) and tell you about the outcome in writing using Form 3 (**Annexure E**).

This period may be extended once, by up to 30 days, if the request is for, or requires a search through, a large number of records and meeting the 30-day period would unreasonably interfere with SpecCon's activities; the records are held at an office in another town or city; consultation within SpecCon or with another body is needed to decide the request; or you agree in writing to the extension (section 57 of PAIA). You will be told of the extension and the reasons for it, and that you may complain to the Information Regulator about it.

If you do not receive a decision within the time allowed, your request is regarded as refused (section 58 of PAIA).

7.4 Records about other people

If a record contains information about a third party, SpecCon will take reasonable steps to tell that person within 21 days of receiving your request and give them 21 days to make representations or to consent to the disclosure, before deciding (sections 71 and 72 of PAIA). SpecCon will decide the request within 30 days after every third party has been told of it and will notify the third party of the decision (section 73).

7.5 Partial access

If part of a record may be refused, SpecCon will give access to the rest of the record (section 59 of PAIA).

Access will be given in the form you ask for, unless that would interfere unreasonably with SpecCon's operations, damage the record or infringe copyright not owned by SpecCon, in which case access may be given in another form (section 60 of PAIA).

7.6 Records that cannot be found

If SpecCon has taken all reasonable steps to find a record and believes that the record cannot be found or does not exist, the Information Officer will tell you so by affidavit or affirmation, giving a full account of the steps taken to find it. This is treated as a refusal of your request (section 55 of PAIA). If the record is found later, you will be given access to it unless it may be refused on a ground in paragraph 8.

8 GROUNDS FOR REFUSAL

SpecCon may, and in some cases must, refuse access to a record on the grounds set out in Part 3, Chapter 4 of PAIA. These are:

- Protecting the privacy of a third party who is a natural person, including a deceased person (section 63).
- Protecting the commercial information of a third party, such as trade secrets or financial, commercial, scientific or technical information (section 64).
- Protecting confidential information of a third party, where disclosure would breach a duty of confidence owed under an agreement (section 65).
- Protecting the safety of individuals and the protection of property (section 66).
- Protecting records that would be privileged from production in legal proceedings (section 67).
- Protecting SpecCon's own commercial information, including trade secrets, information that could harm its commercial or financial interests or prejudice its negotiations or competitive position, and computer programs it owns (section 68).
- Protecting research information of SpecCon or a third party (section 69).

SpecCon must nevertheless give access if disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm (section 70 of PAIA).

If access is refused, the Information Officer will give adequate reasons for the refusal, including the provisions of PAIA relied on, and will tell you of your right to lodge a complaint with the Information Regulator or apply to court (section 56(3) of PAIA).

9 REMEDIES IF A REQUEST IS REFUSED

SpecCon does not have an internal appeal procedure. The decision of the Information Officer is final within SpecCon.

If you are not satisfied with a decision on your request, including a refusal, the fees charged, an extension of time or the form of access, you may:

- Lodge a complaint with the Information Regulator within 180 days of being told of the decision (section 77A of PAIA), on Form 5 prescribed by the PAIA Regulations (available at www.inforegulator.org.za), sent to PAIAComplaints@inforegulator.org.za.
- After the complaint procedure before the Information Regulator has been exhausted, apply to court for appropriate relief within 180 days (section 78 of PAIA).

Section 78(1) of PAIA provides that a requester may apply to court only after the complaint procedure in section 77A has been exhausted. A court may condone an application brought outside the 180-day period where the interests of justice require it (section 82 of PAIA). A third party who is aggrieved by a decision to grant access to a record that concerns them has the same remedies.

10 FEES

The fees below are prescribed for private bodies in the PAIA Regulations, 2021. The amounts are the maximum amounts prescribed and include VAT, where applicable; no VAT is added to them.

Request	Fee
Request fee (not payable by a personal requester)	R140.00
Photocopy or printed black-and-white copy of an A4 page	R2.00 per page
Printed copy of an A4 page	R2.00 per page
Copy on a flash drive provided by the requester	R40.00
Copy on a compact disc provided by the requester	R40.00
Copy on a compact disc provided by SpecCon	R60.00
Transcription of visual images, per A4 page	Service provider's quotation
Copy of visual images	Service provider's quotation
Transcription of an audio record, per A4 page	R24.00
Copy of an audio record on a flash drive provided by the requester	R40.00
Copy of an audio record on a compact disc provided by the requester	R40.00
Copy of an audio record on a compact disc provided by SpecCon	R60.00

Request	Fee
Search for and prepare the record, for each hour or part of an hour after the first hour	R145.00
Maximum search and preparation fee per request	R435.00
Deposit, if search and preparation is likely to take more than six hours	Not more than one third of the access fee payable if the request is granted
Postage, email or other electronic transfer	Actual cost, if any

11 PROCESSING OF PERSONAL INFORMATION

SpecCon processes personal information in line with the eight conditions for lawful processing in POPIA: accountability, processing limitation, purpose specification, further processing limitation, information quality, openness, security safeguards and data subject participation. More detail is set out in SpecCon's Privacy Notice on www.speccon.co.za.

11.1 Purposes of processing

SpecCon processes personal information to:

- Enrol, train, assess, certify and support learners, including on learnerships, skills programmes and online courses.
- Administer learner stipends and host-employer placements.
- Consider applications for learnerships and other programmes.
- Report learner registrations, progress and achievements to SETAs, the QCTO and other bodies, as the law or funding agreements require.
- Provide its digital platforms, including SpecCon Academy and Passport2Work, and the services users sign up for.
- Provide services to clients under its agreements with them.
- Recruit, employ and manage its staff.
- Manage its relationships with suppliers and service providers.
- Meet its legal, tax, regulatory and reporting obligations, including Employment Equity and B-BBEE reporting.
- Verify the identity of people who contact SpecCon or use its services.
- Keep its systems and information secure, prevent fraud and investigate incidents.

- Secure SpecCon's premises, including through access control and CCTV.
- Record calls for quality, training, meetings and fraud prevention purposes.
- Communicate with clients and users, including direct marketing in accordance with section 69 of POPIA and only where the person has not objected.
- Protect or defend SpecCon's legal rights.

11.2 People SpecCon hold information about, and what it holds

People	Personal information
Learners and learnership applicants	Name, ID or passport number, date of birth, gender, race, nationality, disability status and support needs, contact details and address, banking details (for stipends), photographs, home language, education and employment history, attendance, assessment results, portfolios of evidence and certificates. Race, gender and disability information is needed for SETA and QCTO reporting.
Children, including learners on SpecCon Academy	Name, grade, school, learning progress and results, and the name and contact details of the parent or guardian.
Job seekers on Passport2Work	Name, contact details and address, ID number, date of birth, gender, nationality, languages, CV, qualifications, work history, assessment results and job applications. If a job seeker chooses to add them: race and disability information. If a job seeker chooses to verify their identity: photos of their ID document and a selfie, and the result of the automated comparison of the two (biometric information, processed only with the job seeker's explicit consent).
Employees, contractors and job applicants	Name, ID number, contact details and address, banking and tax details, remuneration and benefits, race, gender and disability (for Employment Equity reporting), health information where needed (for example sick leave and occupational injuries), qualifications, performance and disciplinary records, next of kin and, where biometric access control is used, biometric data.
Clients and their representatives	Company name, registration and VAT numbers, B-BBEE information, names and contact details of representatives, banking and payment details, agreements and correspondence.

People	Personal information
People whose information clients load onto SpecCon's business software	Whatever the client loads, for example its employees' records. SpecCon processes this information only on the client's instructions, as an operator. The client is the responsible party.
Suppliers and service providers	Company details, names and contact details of representatives, banking details, B-BBEE information and agreements.
Facilitators, assessors and moderators (contractors)	Name, ID number, contact details, qualifications and SETA and QCTO registrations, banking and tax details, and agreements.
Website visitors and people who contact SpecCon	Name, contact details and message; IP address, browser details and website use, collected through cookies with consent where required.
Visitors to SpecCon's premises	Name, contact details and access records and, where applicable, CCTV footage and biometric access data.

11.3 Special personal information and children

Some of this information is special personal information, such as race, health and disability information and, where identity verification is used, biometric information. SpecCon processes special personal information only where POPIA allows it, namely:

- Information about race or ethnic origin, where it is needed to comply with laws and measures designed to protect or advance persons disadvantaged by unfair discrimination, such as Employment Equity, B-BBEE, and SETA and QCTO reporting (section 29(b) of POPIA).
- Health and disability information about employees and learners, where it is needed to meet obligations under labour, skills development and tax legislation, to make reasonable accommodation, or to manage sick leave and occupational injuries (sections 27(1)(b) and 32(1)(f) of POPIA).
- Where processing is otherwise necessary to establish, exercise or defend a right or obligation in law (section 27(1)(b)).
- With the person's consent, for example disability support needs that a learner chooses to disclose, race and disability information that a job seeker chooses to add to their Passport2Work profile, and biometric information used for identity verification or access control to SpecCon's premises (section 27(1)(a)).

SpecCon does not ask learners, learnership applicants or job seekers for information about criminal behaviour. Criminal checks are done on request of the client and for absorption leaders at cost to the client.

SpecCon processes the personal information of children only with the prior consent of a parent or guardian, or where POPIA otherwise allows it (section 35 of POPIA). On SpecCon Academy, a parent or guardian registers the child and gives that consent. A parent or guardian may exercise a child's rights under POPIA on the child's behalf.

11.4 Who receives personal information

SpecCon shares personal information only where it is needed for the purposes above, where the law requires it, or where the person has agreed. Recipients include:

- SETAs and the QCTO, and through them the South African Qualifications Authority's National Learners' Records Database.
- Client employers that fund or host learners, for learnership administration and progress reports.
- Assessors, moderators and workplace providers who work with SpecCon.
- Government bodies such as SARS, the Department of Employment and Labour and the Unemployment Insurance Fund, where the law requires it.
- Potential employers, when a Passport2Work job seeker applies for a job or chooses to make their CV visible to them.
- B-BBEE verification agencies, auditors and professional advisers.
- Service providers (operators) that process information for SpecCon, such as cloud hosting, email, AI and payment providers, under written agreements that require them to keep it secure and confidential.
- Other companies in the SpecCon Group.
- Law enforcement agencies, regulators and courts, where the law requires it.

11.5 Information sent outside South Africa

Some of SpecCon's service providers store or process personal information outside South Africa. SpecCon sends personal information outside South Africa only where section 72 of POPIA allows it,

for example where the recipient is bound by a law, binding corporate rules or a binding agreement that gives protection substantially like POPIA.

Country	What is sent, and why it is allowed
Germany (European Union)	Microsoft Azure (Germany West Central) hosts SpecCon's platforms and business software, including The Accelerator Platform, SpecCon Academy and Passport2Work, with their databases and stored files, and runs Passport2Work identity verification (Azure Document Intelligence and Face). Hetzner hosts SpecCon's online learning system (Moodle). Protected by the EU General Data Protection Regulation and each provider's data processing agreement.
Ireland (European Union)	AI services used in some features that process personal information (Amazon Web Services Bedrock), for example reading CVs, marking the answers of learners and job seekers, and analysing HR incidents and disciplinary matters. Protected by the EU General Data Protection Regulation and each provider's data processing agreement.
United States	Email delivery (Twilio SendGrid); WhatsApp messages (Meta); Google sign-in, reCAPTCHA and website analytics (Google); in-app subscriptions (Apple, Google Play and RevenueCat); and accounting records (Xero). Protected by a binding agreement with each provider that provides an adequate level of protection, as section 72(1)(a) of POPIA requires.

SpecCon does not transfer special personal information or the personal information of children to a third party in a foreign country that does not provide an adequate level of protection, unless the Information Regulator has authorised it in advance (section 57(1)(d) of POPIA).

11.6 Information security measures

SpecCon protects personal information with technical and organisational measures that suit the risk, including:

- Limiting access to personal information to staff and service providers who need it for their role.
- Secure sign-in to SpecCon's systems.
- Encrypting information in transit.
- Regular backups and recovery procedures.

- Monitoring and logging access to systems.
- Firewalls, anti-malware protection and regular patching.
- A register of security incidents.
- Secure off-site storage of physical records.
- An information security management system aligned with ISO/IEC 27001. Certificate issued 6th Oct 2026 Certificate Number SAIT1042. Renewal date 6th Oct 2027.
- Written agreements with operators that require them to keep personal information secure and confidential.
- Confidentiality obligations and privacy training for staff.
- Keeping paper records in locked storage.
- A procedure for responding to security compromises, including notifying the Information Regulator and affected people as section 22 of POPIA requires.

These measures are reviewed regularly.

11.7 How long SpecCon keeps personal information / Retention

SpecCon keeps personal information only for as long as it is needed for the purpose it was collected for, or for as long as the law, SETA and QCTO requirements or SpecCon's agreements require. It is then destroyed, deleted or de-identified.

When the retention period ends, we destroy, delete or de-identify the record as soon as reasonably practicable, in a way that prevents its reconstruction in an intelligible form (section 14(4)). In the circumstances listed in section 14(6) we restrict processing instead of deleting.

Record Category	Retention Period / Criteria	Basis
Learner data and POE file	Up to 5 years against SETA and QCTO requirements	Legal / SETA requirement
Employee and HR records	5 years after the last entry under the Basic Conditions of Employment Act, section 31.	Legal obligation in conjunction with the Employment Equity Act and the occupational Health and Safety Act.
Financial and tax records	5 years under the Tax Administration Act 28 of 2011, section 29.	Legal obligation

Record Category	Retention Period / Criteria	Basis
Company secretarial records	7 years under the Companies Act 71 of 2008, section 24, unless a longer period applies.	Legal obligation
Client and contract records	Duration of the agreement.	Contract
Enquiries and contact-form data	30 days after last contact.	Consent
Marketing preferences	Until you withdraw consent or opt out, then a suppression record so we do not contact you again.	Consent
Website logs and cookie data	See section 11.8 for cookie lifespans	Legitimate interest; consent
Biometric access records	Deleted when a learner leaves the learnership or an employee leaves the company.	Depart / Deployment Basis

11.8 Cookies

Like most websites, we use cookies. A cookie is a small file stored on your device. Cookies and other online identifiers can identify you, so they are personal information (section 1) and the POPIA conditions apply to them. We use cookies to store visitors' preferences and the pages they visited, and we use that information to improve your experience by tailoring our page content to your browser type and other information.

Cookie category	Purpose	Your choice
Strictly necessary	Security, page loading, and remembering your cookie choices	No consent needed; cannot be switched off
Preferences	Remember settings such as language or form entries	Opt-in
Analytics	Understand how visitors use the website so we can improve it	Opt-in

Cookie category	Purpose	Your choice
Advertising and third-party	Allow ad networks and other third parties to measure and personalise advertising	Opt-in

Log files

Like most hosting services, our websites record log files. These record IP addresses, browser type, Internet Service Provider, date, and time stamp, referring and exit pages and the number of clicks. We use them to analyse trends, administer the site, track movement on the site and gather demographic information. Log files are only accessible to one product owner for security reasons.

11.9 Your rights under POPIA

If SpecCon holds your personal information, you may:

- Ask whether SpecCon holds personal information about you, free of charge, and ask for a copy or description of it and of the identity of the third parties, or categories of third parties, who have or have had access to it (section 23 of POPIA). A request for a copy is made on Form 2 (**Annexure B**) (section 25 of POPIA). The fees in paragraph 10 may apply to copies, and SpecCon will give you a written estimate of the fee before providing the service.
- Ask SpecCon to correct or delete personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, or to destroy or delete a record it is no longer allowed to keep, using Form 2 (**Annexure D**) (section 24).
- Object, on reasonable grounds, to processing based on section 11(1)(d) to (f) of POPIA, including SpecCon's legitimate interests, and object at any time to direct marketing, using Form 1 () (section 11(3)).
- Withdraw your consent **Annexure C**, where SpecCon relies on your consent (section 11(2)(b)).
- Ask not to be subject to a decision based only on automated processing that has legal consequences for you or affects you substantially, subject to the exceptions in section 71.
- Complain to the Information Regulator (section 74).
- Institute civil proceedings for damages for interference with the protection of your personal information (section 99).

Send requests to privacy@speccon.co.za. SpecCon will respond within 30 days of receiving your request.

To complain to the Information Regulator, use the Regulator's POPIA complaint form and send it to POPIAComplaints@inforegulator.org.za. We encourage you to contact SpecCon first so that we can try to resolve the matter.

12 AVAILABILITY AND UPDATING OF THIS MANUAL

This Manual is available:

- On SpecCon's website, www.speccon.co.za.
- For inspection at SpecCon's head office and at the principal place of business of each SpecCon company during normal business hours, free of charge.
- From the Information Officer on request, at the copying fees in paragraph 10; and
- To the Information Regulator on request.

SpecCon reviews this Manual at least once a year and whenever the information in it changes. The latest version is always on SpecCon's website. https://speccon.co.za/paia-manual.html

13 ANNEXURES

The annexures below form part of this Manual. The prescribed forms in **Annexures A to E** are also available on SpecCon's website.

- **Annexure A:** Form 1, Request for a Copy of the Guide (PAIA Regulation 3).
- **Annexure B:** Form 2, Request for Access to Record (PAIA Regulation 7).
- **Annexure C:** Form 1, Objection to the Processing of Personal Information (POPIA Regulation 2).
- **Annexure D:** Form 2, Request for Correction or Deletion of Personal Information or Destruction or Deletion of Record of Personal Information (POPIA Regulation 3).
- **Annexure E:** Form 3, Outcome of Request and of Fees Payable (PAIA Regulation 8).
- **Annexure F:** SpecCon Group companies, brands and sites covered by this Manual.

14 APPROVAL

This Manual was approved on the date of the last signature below and takes effect from that date.

Heinrich van der Westhuizen
Information Officer
Date: 18 Nov 2026

Joe Niemand
CEO
Date: 18 Nov 2026

Hettie Mills
Deputy Information Officer
Date: 18 Nov 2026

Hermias Nieuwoudt
Digital Solutions
Date: 18 Nov 2026

ANNEXURE A

FORM 1

REQUEST FOR A COPY OF THE GUIDE FROM AN INFORMATION OFFICER

[Regulation 3(2) of the Regulations relating to the Promotion of Access to Information, 2021]

To: The Information Officer
SpecCon Holdings (Pty) Ltd
Midlands Office Park, Suites W003 and W004,
1 Mount Quray Street, Midstream, 1692

Email: privacy@speccon.co.za

Full names and surname	
Identity number	
Postal address	
Telephone number	
Email address	

I request _____ copy/copies of the Guide on how to use the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), in the following official language(s):

_____

Manner in which the Guide is to be provided (mark with an "X"):

☐ Collection at SpecCon's office	☐ Email	☐ Post

Note: No fee is payable for a copy of the Guide or for inspecting it at SpecCon's office (regulation 3(3)).

Signed at _____ this _____ day of _____ 20____

_____

Signature of requester

ANNEXURE B

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7 of the Regulations relating to the Promotion of Access to Information, 2021]

NOTE:

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

To: The Information Officer
SpecCon Holdings (Pty) Ltd
Midlands Office Park, Suites W003 and W004,
1 Mount Quray Street, Midstream, 1692

Email: privacy@speccon.co.za

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			
Email address			
Contact numbers	Tel. (B):	Cellular:	Facsimile:
Full names of person on whose behalf request is made (if applicable)			
Identity number			

Postal address	
Street address	
Email address	
Contact numbers	Tel. (B): Cellular: Facsimile:

PARTICULARS OF RECORD REQUESTED

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 space provided is inadequate, please continue a separate page and attach it to this form. All additional pages must be signed.)

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

TYPE OF RECORD (mark the applicable box with an "X")

☐	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
☐	Records are held on a computer or in an electronic or machine-readable form

FORM OF ACCESS (mark the applicable box 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 the applicable box with an "X")

☐	Personal inspection of records at registered address of public or 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)
☐	Email of information (including soundtracks if possible)
☐	Cloud share or 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 space provided is inadequate, please continue 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 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 from 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, of 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 or person on whose behalf the request is made

FOR OFFICIAL USE

Reference number	
Request received by (name and surname of Information Officer or Deputy Information Officer)	
Date received	
Access fees	
Deposit (if any)	
Signature of Information Officer	

ANNEXURE C

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, 2018

[Regulation 2(1)]

Note:

1. Affidavits or other documentary evidence in support of the objection may 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. Complete as is applicable.

Reference number: _____

A. DETAILS OF DATA SUBJECT

Name(s) and surname / registered name of data subject	
Unique identifier / identity number	
Residential, postal or business address	
Contact number(s)	
Fax number / email address	

B. DETAILS OF RESPONSIBLE PARTY

Name of public or private body (if the responsible party is not a natural person)	SpecCon Holdings (Pty) Ltd
Business address	Midlands Office Park, Suites W003 and W004, 1 Mount Quray Street, Midstream, 1692
Contact number(s)	+27 (0)12 667 4962
Email address	privacy@speccon.co.za

C. REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) TO (f) (please provide detailed reasons for the objection)

Signed at _____ this _____ day of _____ 20____

_____

Signature of data subject or designated person

ANNEXURE D

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, 2018

[Regulation 3(2)]

Note:

1. Affidavits or other documentary evidence in support of the request may 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. Complete as is applicable.

Reference number: _____

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

A. DETAILS OF THE DATA SUBJECT

Name(s) and surname / registered name of data subject	
Unique identifier / identity number	
Residential, postal or business address	
Contact number(s)	
Fax number / email address	

B. DETAILS OF RESPONSIBLE PARTY

Name of public or private body (if the responsible party is not a natural person)	SpecCon Holdings (Pty) Ltd
Business address	Midlands Office Park, Suites W003 and W004, 1 Mount Quray Street, Midstream, 1692
Contact number(s)	+27 (0)12 667 4962
Email address	privacy@speccon.co.za

C. INFORMATION TO BE CORRECTED, DELETED OR DESTROYED

D. REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN (please provide detailed reasons for the request)

**Delete whichever is not applicable.*

Signed at _____ this _____ day of _____ 20____

_____

Signature of data subject or designated person

ANNEXURE E

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8 of the Regulations relating to the Promotion of Access to Information, 2021]

Note:

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

Reference number: _____

To: _____

_____

Your request dated _____ refers.

1. You requested personal inspection

Personal inspection of information at the registered address of SpecCon (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 of the Regulations.

OR

2. You requested a copy or transcription of the information

☐	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. To be submitted by

☐	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)
☐	Email of information (including soundtracks if possible)
☐	Cloud share or 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.)

Kindly note that your request has been:

☐	Approved
☐	Denied, for the following reasons:

4. Fees payable related to your request

Item	Cost per A4-size page or part thereof / item	Number of pages / items	Total
Photocopy or printed black and white copy of A4-size page	R2.00		
Printed copy of A4-size page	R2.00		
Copy in computer-readable form on flash drive (provided by requester)	R40.00		
Copy in computer-readable form on compact disc (provided by requester)	R40.00		

Item	Cost per A4-size page or part thereof / item	Number of pages / items	Total
Copy in computer-readable form on compact disc (provided to requester)	R60.00		
Transcription of visual images, per A4-size page	Quotation of service provider		
Copy of visual images	Quotation of service provider		
Transcription of an audio record, per A4-size page	R24.00		
Copy of an audio record on flash drive (provided by requester)	R40.00		
Copy of an audio record on compact disc (provided by requester)	R40.00		
Copy of an audio record on compact disc (provided to requester)	R60.00		
Search for and preparation of the record, per hour or part of an hour, excluding the first hour (not to exceed R435.00)	R145.00		
Postage, email or any other electronic transfer	Actual expense, if any		
TOTAL			

5. Deposit payable (if search exceeds six hours)

Yes ☐ No ☐	Hours of search:	Amount of deposit (not more than one third of the total amount per request):

The amount must be paid into the following bank account:

Name of bank	First National Bank
Name of account holder	SpecCon Holdings (Pty) Ltd
Type of account	Enterprise Business Account
Account number	63148274698
Branch code	210835
Reference number	

Submit proof of payment to	privacy@speccon.co.za

Signed at _____ this _____ day of _____ 20____

_____

Information Officer

ANNEXURE F

SPECCON GROUP COMPANIES, BRANDS AND SITES COVERED BY THIS MANUAL

[Paragraphs 1.2 and 1.3 of this Manual]

Part 1: Companies

Company	Registration number	Head of the private body	Information Officer and Deputy Information Officer (as registered)	Physical and postal address, telephone and email
SpecCon Holdings (Pty) Ltd	2013/101544/07	Heinrich van der Westhuizen	Heinrich van der Westhuizen (Information Officer). Hettie Mills (Deputy Information Officer)	As in paragraph 2
Megro Gold 295 (Pty) Ltd	2005/004452/07	Heinrich van der Westhuizen	Heinrich van der Westhuizen (Information Officer). Hettie Mills (Deputy Information Officer)	16 Russel Street, Nelspruit, 1200
Andebe Group (Pty) Ltd	2012 / 058359 / 07	Heinrich van der Westhuizen	Heinrich van der Westhuizen (Information Officer). Hettie Mills (Deputy Information Officer)	14 South Street, Die Hoewes, Centurion, 0157

Company	**Registration number**	**Head of the private body**	**Information Officer and Deputy Information Officer (as registered)**	**Physical and postal address, telephone and email**
TAP eLearning (Pty) Ltd	2023 / 883043 / 07	Heinrich van der Westhuizen	Heinrich van der Westhuizen (Information Officer). Hettie Mills (Deputy Information Officer)	1 Mount Quray Street, Midlands Office Park, Midstream, 1692
Infinity Training Group (Pty) Ltd	2016 / 163673 / 07	Heinrich van der Westhuizen	Heinrich van der Westhuizen (Information Officer). Hettie Mills (Deputy Information Officer)	As in paragraph 2

Part 2: Brands, platforms and websites operated by SpecCon

Companies	**Website**
SpecCon Holdings	speccon.co.za
Megro Gold	megrolowveld.com
Andebe Group	andebe.co.za
Infinity Training Group	infinitylearn.co.za
TAP eLearning	elearning.co.za
Education Brands	**Website**
SpecCon Academy	specconacademy.co.za
Passport2Work	passport2work.co.za
The Accelerator Platform (TAP)	tap.co.za
SpecCon LMS (white-labelled learning management systems)	specconlms.co.za
Compliance Solutions	**Website**
Employment Equity Act solutions	employmentequityact.co.za
B-BBEE solutions	bbbee.co.za
Skills development solutions	skillsdevelopment.co.za
Continuous Professional Teacher Development	cptd.co.za

Part 3: Learning Centres

Learning Centre	**Address**
Centurion	182 Cradock Avenue, Lyttleton Manor, 0157
Cape Town	Sunbel Building, 12th Floor, 3 Old Paarl Road, Bellville, 7530
Mbombela	16 Russel Street, Nelspruit, 1200

End of Manual