

PAIA Manual

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

Introduction of PAIA

PAIA gives effect to the constitutional right to access information held by the State and information held by another person that is required for the exercise or protection of any rights and to provide for matters connected therewith. Thus, natural and/or juristic persons have the right of access to data records held by either a Private or Public body, subject to certain limitations. This right is extended in POPIA as it grants data subjects the right to request access to information or data records, in accordance with the provisions of PAIA from any responsible party. Section 32(1)(a) of the Constitution of the Republic of South Africa provides that everyone has a right of access to information held by the state and any other person that is required for the exercise or protection of any rights.

ZHERO LIMITED conducts its operations in compliance with all legal and regulatory requirements. This document “the PAIA Manual” is intended to ensure that ZHERO LIMITED complies with Section 51 of the Promotion of Access to Information Act 2 of 2000 (Private Body). The Manual relates to records and information in the possession of ZHERO LIMITED and the publication or release of any of these records and information to the public and a copy can be requested from our offices.

Purpose of the PAIA Manual

This PAIA Manual serves the following purposes for the public:

Check the categories of subject held by ZHERO LIMITED which are available without a person having to submit a formal PAIA request.

- Understand how to make a request for access to a record or information held by ZHERO LIMITED.
- Know the description of the records held by ZHERO LIMITED which are available in accordance with any other legislation.
- Access all the relevant contact details of the Information Security Officer who will assist the public with the record ZHERO LIMITED intend to access.
- Provide a list of information, records, and other details held by ZHERO LIMITED.

- Know the description of the Guide on how to exercise any right contemplated in PAIA and POPIA (“the Guide”), as updated by the Regulator and how to obtain access to it.
- Know if ZHERO LIMITED will process personal information, the purpose of processing personal information, and the description of the categories and of the information or categories of information relating thereto.
- Know the identity of recipients or categories of recipients to whom the personal information may be supplied.
- Know if ZHERO LIMITED has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.
- Know whether ZHERO LIMITED has appropriate security measures to ensure the confidentiality, integrity, and availability of the personal information which is to be processed.

Records of ZHERO LIMITED available in accordance with other legislation:

- Auditing Profession Act No. 26 of 2005, as amended.
- Basic Conditions of Employment Act No. 75 of 1997, as amended.
- Companies Act No. 71 of 2008, as amended.
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993, as amended.
- Consumer Protection Act No. 68 of 2008, as amended.
- Electronic Communications Act No. 36 of 2005, as amended.
- Electronic Communications and Transactions Act No. 25 of 2002, as amended.
- Employment Equity Act No. 55 of 1998, as amended.
- Financial Advisory and Intermediary Services Act No. 37 of 2002, as amended.
- Financial Intelligence and Centre Act No. 38 of 2001, as amended.
- Labour Relations Act No. 66 of 1995, as amended.
- Occupational Health and Safety Act No. 85 of 1993, as amended.
- Pension Funds Act No. 24 of 1956, as amended.
- Prevention and Combating of Corrupt Activities Act No. 12 of 2004, as amended.
- Prevention of Organized Crime Act No. 121 of 1998, as amended.
- Skills Development Act No. 97 of 1998, as amended.
- Skills Development Levies Act No. 9 of 1999, as amended.
- Unemployment Insurance Act No. 30 of 1996

Description of the subjects and categories of records held by ZHERO LIMITED:

The PAIA provides that a person may only request information from a private body if the requested information is required for the exercise or protection of a right. Further, POPIA provides that a data subject may, upon proof of identity, request the responsible party to confirm, free of charge, all the information it holds subject about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information. POPIA further provides that where the data subject is required to pay a fee for services provided to them by the responsible party, the responsible party:

- Must provide the data subject with a written estimate of the payable amount before providing the service.

Application to access to the following data records subject are needed may be subject to certain limitations.

ZHERO LIMITED holds records on various subjects, and the categories of records held on each subject are as follows:

Personal Data records:

- Personal Data records supplied by the employees.
- Data records provided by a third party relating to employees.
- Conditions of employment and other personnel-related contractual and quasi-legal data records.
- Internal pricing data records subject and other internal data records.
- Correspondence related to personnel.
- Training data records subject and material.
- Employment Equity Plans.

Client Data records may include:

- Media releases and meeting minutes.
- Financial Documents.
- Contracts / Agreements.
- Disaster recovery Documents.
- IT governance Documents.
- Licensing and Procurement.

- Communication.
- Business Information.
- Contact Details.
- Information Technology Data records.

Recipients to whom the PI may be supplied to:

We would like to draw particular attention to the fact that in certain jurisdictions, ZHERO LIMITED has a legal obligation to report suspicious transactions and other activities to relevant regulatory authorities under anti-money laundering, terrorist financing, insider dealing, or related legislation. ZHERO LIMITED also reports suspected criminal activity to the police and other law enforcement bodies. We are not always permitted by the law to inform you about this in advance of the disclosure, or at all.

ZHERO LIMITED does not sell, trade, or rent your personal information to others.

Other recipients may include:

- With our affiliates and subsidiaries.
- With business partners, vendors, or contractors to provide requested services or facilitate transactions.
- In connection with any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition.
- In response to a request for information by a competent authority.
- Where necessary to comply with judicial proceedings, court orders, or government orders.
- To protect the rights, property, or safety of ZHERO LIMITED, its business partners, you, or others, or as otherwise required by applicable law.
- Where you consent to the sharing of your personal data.
- On our website www.zhero.co.uk

Transborder flows of PI

As a global company, ZHERO LIMITED may transfer your personal data to countries where we do business in connection with the purposes.

Where we transfer your personal data from a location within the European Economic Area (the EEA) or Switzerland to a country outside the EEA or Switzerland and that country does not provide a level of protection for personal data which the European Commission (“Commission”) deems adequate, we adhere to the standard contractual clauses (“SCCs”) approved by the Commission and applicable data protection laws in the EEA which give you the following rights:

- Where ZHERO LIMITED processes your personal data based on your consent, you may withdraw your consent at any time for future processing.
- You may request access to and correction of your personal data which is held by us at any time.
- You may object to the processing of your personal data at any time.
- You may lodge a complaint with a data protection authority if you believe that your rights relating to the protection of your personal data have been breached or that your personal data has been compromised.
- Where ZHERO LIMITED transfers your personal data to third parties, ZHERO LIMITED requires those third parties to sign agreements which include the SCCs (or other data transfer mechanism approved by the Commission).

Security of your personal data

ZHERO LIMITED is committed to protecting your personal data from misuse, loss, unauthorized access, modification, or disclosure by using a combination of physical, administrative, and technical safeguards and contractually requiring that third parties to whom we disclose your personal data do the same.

ZHERO LIMITED adopts appropriate data collection, storage, and processing practices and security measures to protect against unauthorized access, alteration, disclosure, or destruction of your personal information, username, password, transaction information, and data stored on our site.

Sensitive and confidential data exchange between our website and its users happens over an SSL secured communication channel and is encrypted and protected with digital signatures, same can be applied for data transfer and electronic communications.

When you submit or post personal data online, you should be aware that the internet is not completely secure. ZHERO LIMITED cannot guarantee the security of any personal data that you submit or post online.

Requesting your PI

Any request for information must comply with all procedural requirements contained in PAIA for the request of access to a record.

The Requester must complete the request for information in using Annexure 1 in this Manual in full, in order for their request to be processed.

The Requester must submit, in addition to the completed access form, a copy of their identity or any other legal means of identification, via conventional mail, e-mail, addressed to the Information Security Officer as indicated below.

This fee is not applicable to personal requesters, referring to any person seeking access to data records that contain their personal information.

An initial request fee of R140.00 (incl. VAT) is payable on submission.

Charges imposed for a request for PI data records

According to Section 54 of PAIA, private bodies have the right to charge a prescribed request fee to a requester before processing the request for information or data records. The fees imposed are determined and published by the Minister, and the current fees are listed below. It is important to note that the Minister's published fees are subject to change, and the fees listed below were accurate at the time of publishing.

Access Fees for FI:

- For every black and white photocopy of an A4-size page or part thereof: R2.00
- For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form: R2.00
- For a copy in a computer-readable form on flash drive (provided by DATA SUBJECT): R40.00
- For a copy in a computer-readable form on compact disc:
 - If provided by requester: R40.00
 - If provided to the requester: R60.00
- For a transcription of an audio record for an A4-size page: R24.00
- For a copy of an audio record on:
 - Flash drive (to be provided by DATA SUBJECT): R40.00

Access fees for time spent by us:

Please contact our FI Department for current fees relating to compiling and preparing these documents.

Granting or refusal of requests:

All requests that adhere to the aforementioned requirements will be promptly processed and reviewed. If access to the requested information is granted, ZHERO LIMITED will inform the requester of the following:

- The prescribed fee for accessing the information or documentation.
- The appropriate form to be completed to gain access.
- The right to lodge a complaint with the Information Regulator or file an application with a court regarding the tender or payment of the request fee, along with the procedure (including the timeframe) for filing the complaint or application.
- If access to the requested information is denied, ZHERO LIMITED will provide the requester with the reasons for refusal. Any money paid by the requester (if applicable) will be refunded, and the requester may be advised to file an application with the court to contest the refusal of the request.

Please note the following grounds subject for refusing requests for information:

- Protection of the privacy of a third party who is a natural person
- Protection of commercial information of a third party
- Protection of certain confidential information of a third party
- Protection of safety of individuals and protection of property
- Protection of data records subject privileged from production in legal proceedings
- Commercial information of the private body
- Protection of research information of a third party and of the private body.

ZHERO LIMITED will provide the requester with a written notice of the decision within 30 days after a decision is made on their request for information. In cases where a request is refused, the notification will include the reasons for the refusal.

ZHERO LIMITED may extend the 30-day notice period for an additional period not exceeding 30 days after receiving the request, depending on the nature of the request and the time required to gather the requested information. The requester will be informed of the extension before the expiry of the 30-day period and provided with reasons for the extension.

Complaints

PAIA allows for the filing of a complaint with the Information Regulator or an application to court in case access to information is refused:

- ZHERO does not have an internal appeals process for denied requests for access to information.
- ZHERO will notify the requester as soon as reasonably possible, but within 30 days after the decision to deny access to information has been made.
- ZHERO will furnish the requester with sufficient reasons for the refusal, including the provisions relied upon, without disclosing details of the record.
- ZHERO will provide the requester with the procedure (including the timeframe) for filing a complaint with the Information Regulator or making an application to court.

Changes to our manual

ZHERO LIMITED has the discretion to update this manual at any time. We encourage everyone to frequently check our website for any changes to stay informed about how we are helping to protect the personal information we collect.

Information Security Officer

Information Security Officer

Nico Thiart

1B Grosvenor Square, Parklane, Century City, Cape Town, 7441

nt@zhero.co.uk

nb@zhero.co.uk

+442071830234

Annexure 1

REQUEST FOR ACCESS TO RECORD

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.
3. All pages must be signed by the requester.

TO: Information Security Officer – Nico Thiar

1B Grosvenor Square, Parklane, Century City, Cape Town, 7441

Or

nb@zhero.co.uk

Mark with an "X"



Request is made in my own name



Request is made on behalf of another person.

Personal information

Full Names	
ID Number Address Postal Address Email Contact number	
Full names of person on whose behalf request are made (if applicable):	
ID Number Address Postal Address Email Contact number	

Details of the record requested:

Please provide comprehensive information about the record you are seeking access to, including any known reference numbers, to facilitate its location. If additional space is needed, please continue on a separate page and attach it to this form. All supplementary pages must be signed.

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

Fees

- A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- You will be notified of the amount required to be paid as the request fee.
- The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
(d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees	
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Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided, please state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
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PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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

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:	Electronic communication:
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Signed at this day of 20

Signature of requester / person on whose behalf request is made

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FOR OFFICIAL Use: Print name of Responsible person:

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Reference number:	
Date received:	
Access fees:	