



PROMOTION OF ACCESS TO INFORMATION ACT (PAIA) MANUAL

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1. “Company” Prochain Best Practice Supply Chain Solutions (Pty) Ltd (registration no.: 2014/252844/07)
- 1.2. “DIO” Deputy Information Officer
- 1.3. “IO” Information Officer
- 1.4. “PAIA” Promotion of Access to Information Act No. 2 of 2000 (as amended)
- 1.5. “POPIA” Protection of Personal Information Act No.4 of 2013
- 1.6. “Regulator” Information Regulator

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1. check the categories of records held by the Company which are available without a person having to submit a formal PAIA request;
- 2.2. have a sufficient understanding of how to make a request for access to a record of the Company, by providing a description of the subjects on which the Company holds records and the categories of records held on each subject.
- 2.3. know the description of the records of the Company which are available in accordance with any other legislation.
- 2.4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- 2.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 2.6. know if the Company will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.7. know the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.8. know the recipients or categories of recipients to whom the personal information may be supplied.
- 2.9. know if the Company transfers or processes personal information outside the Republic of

South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

- 2.10. know whether the Company has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. CONTACT DETAILS

3.1. Information Officer

Name: Prof Abraham Daniel Bosman Grobler
Email: awie.grobler@prochain.co.za
Tel: 010 823 4777

3.2. Deputy Information Officer

Name: Lizelle Visser
Email: Lizelle.visser@prochain.co.za
Tel: 010 823 4777

3.3. General Contact Information

Telephone: 010 823 4777
Email: info@prochain.co.za

3.4. Head Office

Physical Address: 557 Jacqueline Drive, Garsfontein, Pretoria, 0081
Postal Address: 557 Jacqueline Drive, Garsfontein, Pretoria, 0081
Telephone: 010 823 4777
Email: info@prochain.co.za
Website: www.prochain.co.za

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

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

- 4.2. The aforesaid Guide contains the description of-

- 4.2.1. the objects of PAIA and POPIA.

- 4.2.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

- 4.2.2.1. The Information Officer of every public body, and
- 4.2.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA.
- 4.2.3. the manner and form of a request for-
 - 4.2.3.1. access to a record of a public body contemplated in section 11; and
 - 4.2.3.2. access to a record of a private body contemplated in section 50.
- 4.2.4. the assistance available from the IO of a public body in terms of PAIA and POPIA.
- 4.2.5. the assistance available from the Regulator in terms of PAIA and POPIA.
- 4.2.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.2.6.1. an internal appeal.
 - 4.2.6.2. a complaint to the Regulator; and
 - 4.2.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.
- 4.2.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.
- 4.2.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- 4.2.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- 4.2.10. the regulations made in terms of section 92.
- 4.3. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.4. The Guide can also be obtained-
 - 4.4.1. upon request to the Information Officer;
 - 4.4.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

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

The categories of records held by the Company which are available without a person having to request access by completing Form 2. Records not available on the website can be requested telephonically or via email.

Category of Records	Type of Record	Available on website	Available on Request
Marketing	Company Profile and marketing information		x
Compliance	PAIA Manual	x	
Compliance	End User License Agreement for VCM	x	x
Compliance	Privacy Policy		x
Compliance	Company Registration Certificate		x
Compliance	Tax compliance Status Pin Document		x
Compliance	Bank Account Confirmation Letter		x
Compliance	B-BBEE Affidavit, Beneficial Ownership Certificate and Confirmation of Turnover		x
Human Resources	Organogram		x
Human Resources	CVs of employees for the purpose of tenders		x

6. RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH LEGISLATION

The categories of records held by the Company are available without a person having to request access by completing Form 2. Records not available on the website can be requested telephonically or via email.

Category of Records	Type of Record
-	-

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

The subjects in respect of which the Company holds records and the categories of records held on each subject is set out below and access can be requested by completing Form 2.

Subjects on which the Company holds records	Categories
Regulatory	<ul style="list-style-type: none"> • Memorandum of Incorporation • Company registration certification • Beneficial Ownership Certificate and share register • Minutes of shareholder meetings • Board resolutions • Other regulatory documentation (tax compliance status pin document, letter of goods standing (COID), B-BBEE affidavit)

Governance	<ul style="list-style-type: none"> • Code of Conduct • Disciplinary Code
Sales and Marketing	<ul style="list-style-type: none"> • Marketing Strategy • List of clients and prospects • Client agreements • Client correspondence • Sales records
Human Resources	<ul style="list-style-type: none"> • HR policies and procedures • Employment contracts • Employee records (including personal information) • Leave Records • Performance management records • Payroll records (including PAYE) • SARS records (e.g. IRP5's) • UIF records • Training attendance register • Disciplinary and grievance records
Finance	<ul style="list-style-type: none"> • Financial statements • Management accounts • Quotations • Creditors' Invoices, statements and credit notes • Debtors' invoices and statements • Banking Records and Statements • Supplier agreement • Insurance Policies
Operations	<ul style="list-style-type: none"> • Client proposals and contracts • Commercial agreements (NDAs) • Supplier vetting documentation and information • Commercial work provided to the Company's clients such as tenders, contracts, amendments, reports, policies, procedures and templates • Destruction Certificates

8. PROCESSING OF PERSONAL INFORMATION

8.1. Purpose of Processing Personal Information

Personal information is collected, stored, and used in compliance with the requirements of POPIA for lawful purposes, and in the usual course of the Company's vetting and screening services, with consent. Data is gathered and stored in a secure, confidential manner, and destroyed once the purpose for which it was collected has been fulfilled.

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, address, registration numbers or identity numbers, contact details, contract information
Service Providers / Suppliers of the company	Company name, registration numbers, VAT numbers, addresses, bank details and other information which a service provider / supplier may share with the Company
Employees	Names, identity numbers, contact details, addresses, qualifications, gender and race, banking details, tax numbers
Candidate applying for vacant positions	CVs, qualifications and other details supplied by the candidate
Subjects of Screening / vetting (vendors / individuals)	<p>Records procured during the course of vetting or screening suppliers or individuals including:</p> <ul style="list-style-type: none"> a) company details: company name, company registration number, addresses, municipal area and contact details. b) directors / members / trustee information: names, identity numbers and documents. c) shareholding information: names, identity numbers and documents, shareholder ownership information, shareholder certificates and shareholder percentages. d) bank account information. e) tax information: tax compliance status pin document and tax numbers. f) B-BBEE information: B-BBEE certificate / affidavit and confirmation of turnover (i.e. turnover letter); g) letter of good standing for workmans compensation. h) contact information. i) other information such as joint venture agreements and certifications. j) technical capability and traceability information, including the supplier's technical assessment scorecard (if applicable); k) any other Personal Information provided in the Software; and l) Special Personal Information of the supplier's directors and/or shareholders such as gender, race, credit history, criminal offences or convictions, political exposure and/or sanctions imposed.
Individuals	Name and surname, identity number, qualifications

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

Categories of Data Subjects	Personal Information that may be processed
Identity numbers and names for identity verification or criminal record checks	<i>Inter alia</i> , South African Police Services
Qualifications, for qualification verifications	<i>Inter alia</i> , South African Qualifications Authority
Credit and payment history, for credit information	<i>Inter alia</i> , Credit Bureaus
Regulatory documentation of suppliers for vetting and screening	<i>Inter alia</i> , publicly available platforms such as BizPortal, SARS, Department of Labour, Financial Institutions (banks), Home Affairs

- 8.4. Planned trans-border flows of personal information

Our vendor compliance management system is hosted on servers located in Europe.

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

8.5.1. The Company utilizes SharePoint as its document control system. Only the Company directors are authorised to configure and manage access to folders within SharePoint. Employees only have access to SharePoint folders directly relevant to their job responsibilities.

8.5.2. The Company's Vendor Compliance management system is hosted on a Microsoft Azure Platform with Rijndael 256-bit encryption to encrypt API data.

9. AVAILABILITY OF THE MANUAL

- 9.1. A copy of the Manual is available-

9.1.1. on www.prochain.co.za;

9.1.2. at the Company's premises for public inspection during Company operating hours.

9.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4. to the Information Regulator upon request.

- 9.2. A fee for a copy of the Manual, shall be payable per each A4-size photocopy made and shall be charged in accordance with the fees prescribed by the Regulator.

10. REASONS FOR REFUSING ACCESS

- 10.1. The Company may refuse access to certain categories of information including:
 - 10.1.1. Disclosure of a natural or juristic person's information without their express consent.
 - 10.1.2. The commercial activities (section 68 of PAIA) of the Company which may include:
 - 10.1.2.1. Confidential information of the Company trade secrets, pricing strategies, marketing plans, and financial information, coding and functionality used in the Company's software.
 - 10.1.2.2. financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of the Company
 - 10.1.2.3. Mandatory protection of commercial information: Access can be denied if the record contains trade secrets, financial, commercial, scientific, or technical information, and disclosure could harm the financial or commercial interests of a third party or the Company. Also, if the record contains information disclosed in confidence by a third party and its disclosure could harm their competitive position.
 - 10.1.2.4. Mandatory protection of confidential information: Records may be refused if their disclosure would breach a duty of confidence owed to a third party as part of an agreement.
 - 10.1.2.5. Mandatory protection of safety and property: Access may be denied ensuring the safety of individuals and the protection of property.
 - 10.1.2.6. Mandatory protection of privileged records: Records that are privileged from production in legal proceedings are protected, unless the legal privilege has been waived.
 - 10.1.2.7. Mandatory protection of research information: Access may be denied for research information belonging to a third party or the Company.
 - 10.1.2.8. Mandatory protection of privacy: Refusal may occur when revealing personal information of a natural person, including a deceased person, would unreasonably invade their privacy.
- 10.2. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

11. RECORDS OF REQUESTS

The Company will maintain records of all requests and responses in compliance with PAIA.

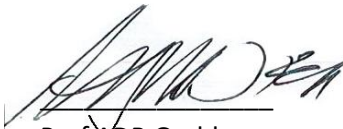
12. INFORMATION OR RECORDS NOT FOUND

- 12.1. If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the head of the company or management shall notify the requestor, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.
- 12.2. The affidavit or affirmation shall provide a full account of all the steps taken to find the record or to determine the existence thereof, including details of all communications by the head of the company or the request liaison officer with every person who conducted the search.
- 12.3. The notice shall be regarded as a decision to refuse a request for access to the record concerned for the purposes of the Act.
- 12.4. If the record in question should later be found, the requestor shall be given access to the record in the manner stipulated by the requestor in the prescribed form unless access is refused by the head of the company or the request liaison officer.
- 12.5. The attention of the requestor is drawn to the provisions of Chapter 4 of Part 3 of the Act in terms of which the company may refuse, on certain specified grounds, to provide information to a requestor.

13. REVIEW OF THE MANUAL

This PAIA Manual will be reviewed periodically to ensure compliance with PAIA and any relevant amendments to the law.

Issued by:



Prof ADB Grobler
Managing Director