



PAIA AND POPI MANUAL



This manual was prepared in line with section 15 of the Promotion of Access to Information Act, 2000. It also addresses requirements of the Protection of Personal Information Act, 2013.

The manual applies to:
Axis House Group (Pty) Ltd
Registration no: 4150306340

Head Office Address:
Suite 21
Katherine and West Building, 3rd Floor
114 West Street
Sandown, Sandton

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1. Introduction

The Promotion of Access to Information Act came into effect in November 2001. According to the Act, Axis House Group (Pty) Ltd is required to compile a manual outlining how the company promotes access to records, the protection of personal information, IT systems measures to prevent data loss and the procedure to be followed when requesters request access to information. Upon request, the company has a duty to release such information unless the Act directly states that the records holding such information must not be released.

1.1 Requesters have statutory rights to information held by private bodies if:

- the information is required for the exercise or protection of any of his/her rights.
- the requester complies with all the procedural requirements for requesting information.

2. Nature of Business

Axis House Group (Pty) Ltd is a leading supplier of mineral processing reagents. In addition to the manufacture and supply of chemicals, Axis House Group (Pty) Ltd has committed resources internationally to add value to the mineral processing plants that it has partnered with. We take an integrated approach to each client and achieve successful partnerships with our clients by providing a complete solution. Alongside our reagent offering, is the technical services provided by our laboratory based in Cape Town, South Africa.

Laboratory test work is a service offered to clients of Axis House Group (Pty) Ltd and assists them with specific problem solving on ore samples provided by customers to optimise reagent selection. The team continuously strive to develop products for the industry through continuous research and development. The aim of working on new technologies is to not only optimise reagent selection but ensure economic viability. We are a problem-



solving solution driven company that applies our technology, knowledge and expertise to increase our clients' recoveries and grades resulting in financial benefit.

3. Company Contact Details

Company Name: Axis House Group (Pty) Ltd
Company Head: Kerstin Stubbs
Physical Address: Suite 21, Katherine & West Building
3rd Floor, 114 West Street
Sandown, Sandton
Postal Address: P.O.BOX 26265
Hout Bay, 7806
Telephone: 011 463 4888
Email: justines@axishouse.co.za
Website: www.axishouse.co.za

3.1 Information Officer

Name: Yvonne Yates
Occupation: Training/Stage & Gate Manager
Telephone: 011 463 4888
Email: yvonney@axishouse.co.za

3.2 Deputy Information Officers

Name: Tanya Hoekstra
Occupation: Executive Secretary/Board Liaison Officer
Telephone: 011 463 4888
Email: tanyat@axishouse.co.za

Name: Heather Barham

Occupation: Financial Manager
Telephone: 011 463 4888
Email: heatherb@axishouse.co.za

4. Availability of PAIA and POPI manual

This manual is available at the offices of Axis House Group (Pty) Ltd. Any person or body who wish to access it may contact the Information Officer to make prior arrangements. The manual is also available for inspection related purposes during office hours.

5. South African Human Rights Commission Guide

The South African Human Rights Commission has made available a guide containing information to assist those who wish to access information and exercise a right in terms of Section 10 of the Promotion for Access to Information (PAIA) Act.

5.1 Enquiries regarding the guide and people's rights can be directed to:

Physical Address

The South African Human Rights Commission
PAIA Unit
27 Stiemens Street
Braamfontein

Telephone Number

011 877 3600

6. Confidentiality and Access to Information

Axis House Group (Pty) Ltd will maintain and protect the confidentiality of information provided by third parties. Information requestors requesting access to personal information

for any of the Company's third parties are required to oblige with the procedure for requesting information. The Company will get the necessary permission before granting access to third parties information.

7. Access to records - procedure and request

Section 50 (1) of the PAIA Act states that a requester must be given access to information of a private body if the information is required for the protection or exercise of any rights or if the requester has complied with the procedural requirements of the Act. The following is the procedure to be followed by requesters when requesting access to records held by Axis House Group (Pty) Ltd:

7.1 Personal Requester – person requesting access to own personal information

Requesters requiring access to personal information held by Axis House Group (Pty) Ltd should complete the form in Annexure 1 and send it to the Information Officer. After receiving the request form, the Information Officer will advise if the request has been approved and how or when the requester will get access to the records.

7.2 Other Requester - person requesting access to any records of the Company

People requiring access to any other records held by the Company must complete part 2 of Annexure 1 and send it to the Information Officer. After receipt of the form, the Information Officer will assess the request and respond within 7 working days.

7.3 Decision

The final decision for approval of requests lies with the Information Officer. The Information Officer will notify the requester in writing if the request is approved or not, stating reasons thereof if access is denied.

7.4 Grounds for refusal of access

As per the Act and depending on the reasons for access to records, the Information Officer may after careful consideration refuse to provide access based on the following grounds:

- the disclosure will involve the unreasonable disclosure of personal information about an employee or third party.
- the record contains trade secrets, financial, commercial, or technical information of Axis House Group (Pty) Ltd.
- the record will put the Company at a disadvantage in contractual or other negotiations.
- the records contain any other information that the company deems very confidential and unreasonable to disclose.

7.5 Remedies available if information is refused

If information is refused, the Information Officer must notify the requester in writing and state reasons and the procedure to follow should the requester wish to lodge a complaint with the court.

Axis House Group (Pty) Ltd does not have an internal appeal procedure. The decision made by the Information Officer is final.

8. Fees

Axis House Group (Pty) Ltd may charge a prescribed fee for access to records. The fee will be determined from time to time depending on the information requested. Requesters will be required to make payment and send proof of payment to the Information Officer before access is granted.

The fee will be determined according to the two types of fees (request and access fee) as provided by the Act. Upon request, a requester maybe required to pay a request fee before the request is processed. Access fee will be determined by the reproduction of information.

9. Records held by the Company

9.1 Records automatically available

Section 51 (c) requires the Company to avail a list of records that are available without a requester having to request access.

- Company policies
- Employment Equity Records
- Training records
- Company/Product brochures

9.2 Records available on request

Section 14 (1) of the Promotion of Access to Information requires Axis House Group (Pty) Ltd to provide details of records held by the Company to accommodate requests for access to information.

The following is a list of records held per department:

9.2.1 Companies Act Information

Board minutes of meetings, Resolutions, Company Registration certificates, Memorandum of Incorporation, Directors and Shareholders, Management Account.

9.2.2 Sales and Marketing

Client agreements, invoices and quotations, tender documents, sales and marketing communication, marketing strategies, trademark applications.

9.2.3 Technical

Trade secrets and/or technical information, research information, test work and test work results, proposals, intellectual property pertaining to product developed including usage of products

9.2.4 Supply Chain

Suppliers and transporters agreement, quotations, and invoices, etc.

9.2.5 Finance

Bank reconciliations, financial statements, audited financials, banking details, invoices, and proof of payments, SARS, PAYE, UIF, income tax, workman's compensation, etc.

9.2.6 Office Administration

Information such as credit applications, service provider agreements, confidentiality deeds & agreements, etc.

9.2.7 Human Resources

Employment Contracts, identity documents, Leave records, Performance Management records, Disciplinary, Salaries and benefits, Job Descriptions, CVs and other application details, SETA Information, Health & Safety, etc.

10 Processing of personal information as per the POPI Act

10.1 Purpose of the processing of personal information

Personal information is processed for the purpose for which it is collected. Axis House Group (Pty) Ltd processes information for the following purposes:

- Staff employment administration
- Providing products and services to customers
- Marketing and sales
- Conducting market or customer satisfaction research
- Procurement of products
- Shipping of goods
- Conducting credit reference checks and assessments

10.2 Categories of data subjects and Personal Information

10.2.1 Staff members

Name & Surname, gender, race, marital status, physical and postal addresses, banking details, identity number, Curriculum Vitae, income tax number.

10.2.2 Clients and Suppliers

Company name & address, contact person & details, vat numbers, registration numbers, banking details,

10.2.3 Service Providers

Company name & address, contact person & details, vat numbers, registration numbers, banking details,

10.3 Recipients of Personal Information

Axis House Group (Pty) Ltd may share information with the following parties:

- Employee benefits service providers
- Product suppliers

10.4 Cross Border flows of Personal Information

Section 72 of the POPI Act states that responsible parties may not transfer personal information about data subjects outside South Africa unless protection of such information is in place and the owner of such information has granted permission.

The Company does not do cross border flow of employees personal information.

10.5 Description of information security measures

Axis House Group (Pty) Ltd has implemented various measures to protect and prevent loss of information as outlined in Appendix 2.

10.6 Objection of personal information processing by a Data Subject

Anyone wishing to retract their consent to processing of personal information has a right to do so in writing to the Information Officer.

10.7 Request for correction or deletion of personal information

Requests must be forwarded by email to the Information Officer at yvonney@axishouse.co.za. The Information Officer will send a confirmation once corrections or deletion has been done.

11. Direct Marketing

All direct marketing communications shall contain the Company's details and a method to opt out of receiving further marketing communication.

11.1 Consent

The Company may send electronic direct marketing communication to customers who have consented to receiving it. Consent may be requested once, and this covers consent for all communication that may be sent.

11.2 Record Keeping

- The Company will keep records of:
- Date of consent
- Wording of the consent
- Who obtained the consent
- Proof of option to opt out on each marketing contact

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: The Information Officer

| |
|--|
| |
| |
| |
| |

(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 <i>(when made on behalf of another person)</i> | | | | |
| Postal Address | | | | |
| Street Address | | | | |
| E-mail Address | | | | |
| Contact Numbers | Tel. (B): | | Facsimile: | |
| | Cellular: | | | |
| Full names of person on whose behalf request is made <i>(if applicable)</i> : | | | | |
| Identity Number | | | | |
| Postal Address | | | | |

| | | | |
|-----------------|----------|--|-----------|
| Street Address | | | |
| E-mail Address | | | |
| Contact Numbers | Tel. (B) | | Facsimile |
| | Cellular | | |

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 provided space is inadequate, please continue on 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 <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i> | |
| 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 <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i> | |
| Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i> | |
| Transcription of soundtrack <i>(written or printed document)</i> | |
| Copy of record on flash drive <i>(including virtual images and soundtracks)</i> | |
| Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i> | |
| 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 <i>(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)</i> | |
| 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> | |

| | |
|--|--|
| PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED | |
| <i>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.</i> | |
| 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) | <i>A request fee must be paid before the request will be considered.</i> |
| b) | <i>You will be notified of the amount of the access fee to be paid.</i> |
| c) | <i>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.</i> |
| d) | <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i> |
| 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 (<i>Please specify</i>) |
|----------------|-----------|--|
| | | |

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

**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.*

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

| | |
|---|--|
| Personal inspection of information at registered address of public/private body (<i>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</i>) 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 (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>) | |
| Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>) | |
| Transcription of soundtrack (<i>written or printed document</i>) | |
| Copy of information on flash drive (<i>including virtual images and soundtracks</i>) | |
| Copy of information on compact disc drive (<i>including virtual images and soundtracks</i>) | |
| Copy of record saved on cloud storage server | |

3. To be submitted:

| | |
|---|--|
| 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 | R40.00 | | |
| • To be provided by requestor | | | |
| (ii) Compact disc | R40.00 | | |
| • If provided by requestor | | | |
| • If provided to the requestor | R60.00 | | |
| For a transcription of visual images per A4-size page | Service to be outsourced. Will depend on the quotation of the service provider | | |
| Copy of visual images | | | |
| Transcription of an audio record, per A4-size | R24.00 | | |
| Copy of an audio record | | | |
| (i) Flash drive | R40.00 | | |
| • To be provided by requestor | | | |
| (ii) Compact disc | R40.00 | | |
| • If provided by requestor | | | |
| • If provided to the requestor | R60.00 | | |
| Postage, e-mail or any other electronic transfer: | Actual costs | | |
| 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