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PAIA AND POPI MANUAL

This manual was prepared in line with section 15 of the Promotion of Access to Information Act No. 2 of 2000 (“**PAIA**”). It also addresses requirements of the Protection of Personal Information Act No. 4 of 2013 (“**POPIA**”).

The manual applies to:

Axis House Group (Pty) Ltd
Registration no: 2016/427904/07
(“the Company”)

Head Office Address:

Katherine & West
Suite 21, 3rd Floor
114 West Street
Sandown, Sandton
South Africa

Contents

1.	Introduction	4
2.	Nature of Business	4
3.	Company Contact Details	5
3.1	Information Officer.....	5
3.2	Deputy Information Officer	5
4.	Availability of PAIA and POPIA manual	5
5.	South African Human Rights Commission Guide	6
6.	Confidentiality and Access to Information.....	6
7.	Access to records - procedure and request	6
7.1	Personal Requester - person requesting access to their own Personal Information.....	7
7.2	Other Requester - person requesting access to any records of the Company	7
7.3	Decision	7
7.4	Grounds for refusal of access	7
7.5	Remedies available if information is refused	7
8.	Fees	8
9.	Records held by the Company	8
9.1	Records automatically available	8
9.2	Records available on request	8
10.	Processing of Personal Information as per POPIA	9
10.1	Purpose of processing Personal Information	9
10.3	Recipients of Personal Information	10
10.4	Cross Border Flow of Personal Information	10
10.5	Description of information security measures	10
10.6	Objection of Personal Information Processing by a Data Subject.....	10
10.7	Request for Correction or Deletion of Personal Information.....	11
11.	Direct Marketing	11
11.1	Consent.....	11
11.2	Recordkeeping.....	11
	ANNEXURE 1	12
	ANNEXURE 2	16
	ANNEXURE 3	18

1. Introduction

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

1.1 Requestors 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; and
- 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 strives to develop products for the industry through continuous research and development. The aim of working on new technologies is not only to optimise reagent selection but ensure economic viability. We are a problem-solving, solution driven company that applies internal 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 (Justine) Hult
Physical Address : Katherine & West
Suite 21, 3rd Floor
114 West Street
Sandown, Sandton
South Africa
Telephone Number : +27 11 463 4888
Postal Address : P.O.BOX 26265
Hout Bay, 7806, Western Cape, South Africa
Email Address : justines@axishouse.co.za
Website : www.axishouse.co.za

3.1 Information Officer

Name : Yvonne Yates
Occupation : Training / Stage and Gate Manager
Telephone Number : +27 11 463 4888
Email Address : yvonney@axishouse.co.za

3.2 Deputy Information Officer

Name : Chiraag Maharaj
Occupation : Group Legal Counsel
Telephone Number : +27 11 463 4888
Email Address : chiraagm@axishouse.co.za

4. Availability of PAIA and POPIA manual

This manual is available at the offices of Axis House Group (Pty) Ltd and on our company website, www.axishouse.co.za. Any person or body who wishes to access the physical manual may contact the Information Officer to make prior arrangements to do so. The manual is only available for inspection during ordinary office hours.

5. South African Human Rights Commission Guide

The South African Human Rights Commission has made available a guide (“**Guide**”) containing information to assist those who wish to access information and exercise a right in terms of Section 10 of PAIA.

5.1 Enquiries regarding the Guide can be directed to:

The Information Regulator

Postal Address : P.O. Box 31533, Braamfontein, 2017, Johannesburg,
Gauteng, South Africa

Physical Address : 27 Siemens Street, Braamfontein, 2017, Johannesburg,
Gauteng, South Africa

Telephone Number : +27 10 023 5200

Website : <https://www.justice.gov.za/inforeg>

Email Address : inforeg@justice.gov.za

6. Confidentiality and Access to Information

Axis House Group (Pty) Ltd will maintain and protect the confidentiality of information provided to it by third parties. Information requestors requesting access to Personal Information from the Company belonging to a third party are required to comply with the procedure for requesting information as set out in PAIA. The Company will obtain the necessary permission from impacted third parties before granting access to such information.

7. Access to records - procedure and request

Section 50 (1) of PAIA 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 PAIA. The following procedure is to be followed by a requester when requesting access to records held by Axis House Group (Pty) Ltd:

7.1 Personal Requester - person requesting access to their 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 respond in terms of the form in [Annexure 2](#) to 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

Requesters requiring access to any other records held by the Company must complete the form in **Annexure 1** and send it to the Information Officer. After receipt of the form, the Information Officer will assess the request and respond in terms of the form in **Annexure 2** within 7 (seven) working days.

7.3 Decision

The final decision on whether or not a request has been approved lies with the Information Officer. The Information Officer will notify the requester in writing if the request is approved or not, stating the reasons should access be denied.

7.4 Grounds for refusal of access

As set out in PAIA, and depending on the reasons for requiring access to the 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 of 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; and/or
- the records contain any other information that the Company deems confidential and unreasonable to disclose.

7.5 Remedies available if information is refused

If the Information Officer refuses to grant access to the requested information, the Information Officer shall notify the requester in writing and state the reasons for refusing

the request. The Information Officer will also set out the procedure to follow should the requester intend to lodge a complaint with a 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 of the fee and send proof of payment to the Information Officer before access is granted.

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. The following categories of records of the Company are available without a requester having to request access in terms of PAIA:

- Company policies;
- Employment Equity records;
- Training records; and
- Company / product brochures.

9.2 Records available on request

Section 14 (1) of PAIA 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, trade mark applications.

9.2.3 Technical

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

9.2.4 Supply Chain

Suppliers and transporters agreements, 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 and agreements, etc.

9.2.7 Human Resources

Employment contracts, identity documents, leave records, performance management records, disciplinary records, salaries and benefits, job descriptions, CVs and other application details, SETA information, Health and Safety, etc.

10. Processing of Personal Information as per POPIA

10.1 Purpose of processing 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; and/or
- conducting credit reference checks and assessments.

10.2 Categories of data subjects and Personal Information

10.2.1 Staff Members

Name and 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 and address, contact person and details, VAT numbers, registration numbers, banking details.

10.2.3 Service Providers

Company name and address, contact person and 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; and
- product suppliers.

10.4 Cross Border Flow of Personal Information

Section 72 of POPIA 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. Any transfer of Personal Information cross border shall comply with POPIA and shall occur, *inter alia*, if the transfer is necessary for the performance of a contract between the data subject and the Company, or for the implementation of pre-contractual measures taken in response to the data subject's request.

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 **Annexure 3**.

10.6 Objection of Personal Information Processing by a Data Subject

Anyone wishing to retract their consent to the 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 deletions have been finalised.

11. Direct Marketing

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

11.1 Consent

The Company may send electronic direct marketing communications 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 Recordkeeping

The Company will keep records of:

- date of consent;
- wording of the consent;
- who obtained the consent; and
- proof of option/s 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	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; padding: 2px;">Tel. (B):</td> <td style="width: 40%; padding: 2px;"> </td> <td style="width: 20%; padding: 2px;">Facsimile:</td> <td style="width: 20%; padding: 2px;"> </td> </tr> <tr> <td style="padding: 2px;">Cellular:</td> <td colspan="3" style="padding: 2px;"> </td> </tr> </table>	Tel. (B):		Facsimile:		Cellular:			
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			
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images (<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: <i>(State Rank, Name And Surname of Information Officer)</i>	
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.	
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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			
• To be provided by requestor	R40.00		
(ii) Compact disc			
• If provided by requestor	R40.00		
• 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			
- To be provided by requestor	R40.00		
(ii) Compact disc			
- If provided by requestor	R40.00		
- 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 (calculated on one third of total amount per request)

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

Measures in Place
Sophos Endpoint (Laptops & Desktops & Servers)
ESET Endpoint (Desktops & Servers CPT)
Backups (Local & Acronis)
Office365 (Email, OneDrive)
SSL VPN for remote access
AD managed access to data on servers
MFA
Office365 Advanced Threat Protection – Selected Users

To be Implemented
Mobile Device Management (Safetica)
Data Loss Protection (Safetica)
Sophos for Mobiles
Email Encryption (Current Partners)
Laptop Encryption (Sophos Central)