



PAIA MANUAL

(Privacy Policy in terms of the Protection
of Personal Information Act, No. 4 2013 (South Africa))

Of

APCAN RISK MANAGEMENT

(“APCAN SECURITY GROUP”)

Registration Number: 2002/030292/07 and its subsidiaries

Organization:	Apcan Security Group
Scope of Policy:	This policy applies to the business of Apcan Security Group wherever it is conducted but based at the registered office. It applies to paid staff.
Policy Operational date:	01/01/2022
Policy prepared by:	Pieter Vorster
Date approved by Information Officer:	14/01/2022
Next policy review date:	February 2023

HEAD OFFICE

20 Alexandra Street
Florida

P O Box 13
Florida Hills, 1716

Tel +27 11 472 0772
Fax +27 86 615 9692
accountant@apcan.co.za

GAUTENG EAST

cnr 5th and 14th St.
Boksburg North

P O Box 13
Florida Hills, 1716

Tel +27 11 917 7888
Fax +27 11 917 6493
sales@apcan.co.za

GAUTENG WEST

19 Madeline Street
Florida

P O Box 13
Florida Hills, 1716

Tel +27 11 472 0770 / 1
Fax +27 11 472 0770 / 1
+27 86 528 0985
sales@apcan.co.za

GAUTENG NORTH

171 Ruimte rd.
Wierdapark, Centurion

P O Box 13
Florida Hills, 1716

Tel +27 12 666 8489 / 99
Fax +27 86 667 3010
sales@apcan.co.za

POLOKWANE

6 Woodbush St,
Polokwane

P O Box 31806
Superbia, 0759

Tel +27 15 293 1060
Fax +27 86 759 1830
sales@apcan.co.za

KWA-ZULU NATAL

4 Brendon Lane, Building 2
Section 6
Westville, 3629

Tel: +27 (0) 10-007-3050

NELSPRUIT

11 Riana Street
Nelspruit

Tel: +27(0) 76 982 7686

KRUGERSDORP

282 Voortrekker Road
Noordheuwel
Krugersdorp

Tel: +27 11 472 0770/1
Email: info@apcan.co.za

STRUBENSVALLEY

1002 Fredenenharry
Shop 16, Cascades
Strubensvalley

Tel: +27 11 446 2983
adminnorth@apcan.co.za

Directors: L. L. Mans, S. N. Mbatha

Apcan Risk Management (Central region) CC
Registered with the Security Industry Regulatory Authority registration number 2597690
Company Registration Number 2008/249689/23





In terms of Section 51 of the Promotion of Access to Information Act No 2 of 2000 as amended ("PAIA") and Section 55 of the Protection of Personal Information Act No. 4 of 2013 ("POPI Act")

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1. Background to the Promotion of Access to Information Act

- 1.1 The Promotion of Access to Information Act, No. 2 of 2000 (PAIA) was enacted on 3 February 2000, to give effect to the constitutional right to access to information held by the State and any information that is held by any other private body that is required for the exercise or protection of any right, as guaranteed in Section 32 in the Bill of Rights in the Constitution of the Republic of South Africa, 108 of 1996.
- 1.2 In terms of Section 51 of PAIA, all private bodies are required to compile an Information Manual generally referred to as a "PAIA Manual".
- 1.3 Where a request for information is made in terms of PAIA, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements and the justifiable limitations set out in section 9 of the Act.

2. Apcan Security Group ("Apcan")

- 2.1 Apcan is one of Southern Africa's largest integrated security solutions providers and the industry leader in protection innovation. Excellence in service delivery and implementation are fundamental to our impressive record of accomplishments.
- 2.2 By keeping abreast of the latest trends and technological developments globally, and continuously evolving and innovating, the Group remains a front-runner in the security solutions market. Through a bouquet of services and related products, the Group can tailor make a solution for any requirements.

3. Details of the Information Officer

- 3.1 PAIA prescribes the appointment of an Information Officer for public bodies, which Information Officer is, inter alia, responsible for the assessment of requests made for information. The head of a private body fulfills this function in terms of Section 51 of the Act. The details of our CEO are as follows:

CEO: Leon Lester Mans

Registered Address: 20 Alexandra Street, Florida, Roodepoort, 1724 (P O Box 13, Florida Hills, 1716)

Telephone Number: 011 472 0772

Website: www.apcan.co.za



- 3.2 Apcan has opted to appoint an Information Officer that oversees Apcan's responsibility in this regard. The Information Officer also refers to the Information Officer as referred to in the Protection of Personal Information Act, No 4 of 2013. Our Information Officer will oversee our obligations in terms of PAIA as well as in terms of POPIA. All request for access to information in terms of PAIA needs to be directed to:

Information Officer:	Pieter Vorster
Physical Address:	20 Alexandra Street, Florida, Roodepoort, 1724
Telephone:	011 472 0772
Email:	audit@apcan.co.za

4. Guide compiled by the Information Regulator of South Africa

- 4.1 PAIA grants a requester access to records held by a private body if the record is required to exercise or protect a right. If the request is lodged by a public body the public body must be acting in the public interest.
- 4.2 A request for information needs to comply with the procedural requirements laid down in PAIA and at the rates provided.
- 4.3 Requesters should take note that the Information Regulator of South African has taken over the regulatory mandate functions relating to the PAIA with effect from 30 June 2021 and can be contacted as follows:

THE INFORMATION REGULATOR OF SOUTH

AFRICA JD HOUSE, 27 SIEMENS STREET

BRAAMFONTEIN JOHANNESBURG

**P.O Box 31511, BRAAMFONTEIN,
JOHANNESBURG, 2017**

EMAIL infoereg@justive.gov.za /



1. Subjects and Categories of Records available in terms of legislation, on request or without request

1.1 Records held by Apcan are available in terms of other legislation (Section 51(1)(d))

1.1.1 Where applicable to its operations, Apcan also retains records and documents in terms of the legislation below. Unless disclosure is prohibited in terms of relevant legislation, regulation, or otherwise, these records are available on a request that has been made under the prescripts of PAIA.

No	Act	Reference
1	Arbitration Act	42 of 1965
2	Basic Conditions of Employment Act	75 of 1997
3	Broad-Based Black Economic Empowerment Act	75 of 1997
4	Companies Act	71 of 2008
5	Compensation of Occupational Injuries & Diseases Act	130 of 1993
6	Copyright Act	98 of 1978
7	Competition Act	71 of 2008
8	Criminal Procedure Act	51 of 1977
9	Cybercrimes Act	19 of 2020
10	Currency and Exchanges Act	9 of 1933
11	Debt Collectors Act	114 of 1998
12	Employment Equity Act	55 of 1998
13	Electronic Communications Act	36 of 2005
14	Financial Intelligence Centre Act	38 of 2001
15	Financial Relations Act	65 of 1976
16	Financial Sector Regulations Act	9 of 2017
17	Firearms Control Act	60 of 2000
18	Harmful Business Practices Act	23 of 1999
19	Income Tax Act	95 of 1967
20	Insolvency Act	24 of 1936
21	Intellectual Property Laws Amendments Act	38 of 1997
22	Labour Relations Act	66 of 1995
23	Long Term Insurance Act	52 of 1998
24	National Credit Act	34 of 2005
25	Occupational Health & Safety Act	85 of 1993
26	Pension Funds Act	24 of 1956
27	Prevention of Organized Crime Act	121 of 1998



28	Private Security Industry Regulation Act	56 of 2001
29	Promotion of Access to Information Act	2 of 2000
30	Protection of Personal Information Act	4 of 2013
31	Protection of Businesses Act	99 of 1978
32	Regional Services Councils Act	109 of 1985
33	SA Reserve Bank Act	90 of 1989
34	Short Terms Insurance Act	53 of 1998
35	Skills Development Levies Act	9 of 1999
36	Stamp Duties Act	77 of 1968
37	Stock Exchange Control Act	1 of 1985
38	Tax on Retirement Funds Act	38 of 1996
39	Trademarks Act	194 of 1993
40	Unemployment Contributions Act	4 of 2002
41	Unemployment Insurance Act	63 of 2001
42	Usury Act	73 of 1968
43	Value Added Tax Act	89 of 1991

5.2 Records held by Apcan that is available on request (Section 51(1)(e))

CATEGORY	RECORDS
Administration	Licenses Correspondence
Financial Records	Accounting Records Annual Financial Reports Annual Financial Statements Asset Registers Bank Statements Banking Details and Bank Accounts Banking Records Debtors / Creditors Statements and Invoices General Ledgers and subsidiary ledgers General Reconciliations Invoices
	Policies and Procedures Rental Agreements Tax Returns



Income Tax Records	<p>PAYE Records Documents issued to employees for income tax purposes Records of payments made to SARS on behalf of employees Records of Payments made to SARS for VAT purposes Documents relating to all other statutory requirements Skills Development Levies UIF Workmen's Compensation</p>
Human Resources	<p>Recruitment Policies Employment Contracts Remuneration, Benefits, and Policies Conditions of Employment Labour & Industrial Relations Pension Fund benefits and contributions Provident Fund benefits and contributions Employment Equity Records of Accidents on-duty Medical Aid Records Salary Records Payroll reports / Wage Registers SETA Records Training Manuals Training Records Workplace and Union agreements and records Records relating to the vetting of an employee in terms of company policy</p>
Procurement	<p>Standard Terms and Conditions for supply Supplier Agreements Policies and Procedures Details of Suppliers including general business name, address, contact person, email address, postal address and bank account details</p>
Sales Department	<p>Customer Details Credit Applications and Records Sales Records Customer Agreements</p>
Risk Management and Reports	<p>Audit Reports (internal and external) Risk Management Frameworks Risk Management Plan Risk Management Policies & Procedures</p>
Health and Safety	<p>Health and Safety Policies and Procedures Inquiries, inspections, IOD, and related reports</p>
IT Department	<p>Computer / mobile device usage policy Disaster recovery plans Hardware asset register Information Security policies, standards, and procedures Information usage policy Software licensing</p>
Operations	<p>Production Records OB reports</p>



Corporate Social Responsibility	Schedule of projects/organizations that receive funding Reports, books, publications, and general information related to corporate social responsibility spend Records and contracts with organizations receiving funding
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5.2.1 Please note that a request made for the records listed above may be refused on grounds set out in this PAIA manual. If the information relates to a third party, we will require consent to disclose, in addition to the other requirements when a request is made.

5.3 Records held by Apcan that is available without a request to access

5.3.1 Records of a public nature that is available on our website, are available without submitting a formal request.

5.3.2 This includes, but is not limited to:

- 5.3.2.1 Product Guides
- 5.3.2.2 Marketing Material
- 5.3.2.3 Statutory Records

6 The request procedure

- 6.1 The request for information must comply with the procedural requirements of the Act.
- 6.2 The request must be made on the prescribed form attached hereto for ease of reference and submit same along with the proof of payments of the prescribed fee (in any) to the CEO or the Information officer at the postal, physical, or electronic email address as contained in Clause 3.1 and 3.2 above.
- 6.3 The prescribed form must be filled in with sufficient detail to enable the Information Officer to:
 - 6.3.1 Identify the records; and
 - 6.3.2 Establish the identity of the requester.
- 6.4 To enable the information officer to respond to the request the requester needs to advise how he would prefer to be granted access and provide a postal or physical address within the Republic of South Africa.
- 6.5 The requested must advise that the request is made to protect or exercise a right and clearly state what the nature of the right is that the requester seeks to exercise or protect. The requested must also specify why the record sought is necessary to exercise or protect the right in question (refer to Section 53(2)(d).



- 6.6 If the request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is requesting the satisfaction of the CEO or the Information Officer.
- 6.7 The prescribed fee must be paid before Apcan can process the request.
- 6.8 Apcan will process the request within 30 (thirty) days.
- 6.9 All information listed in this Clause 6 must be provided failing which the request will be delayed. The time frame as set out above shall not commence until all the necessary and required information has been received.

7 Fees

- 7.1 A request who seeks access to a record containing personal information about the requester is not required to pay any fees.
- 7.2 If an application for information is made on behalf of another person, the request must pay a fee of R50.00. The Information Officer shall advise the requester if a fee is payable and will do so before processing the request. A requester may lodge an application to the court against the tender or payment of a fee.

8 Refusal of an Application for Information

- 8.1 In terms of PAIA, Apcan **must refuse** an application for information if (subject to certain exclusions):
- 8.1.1 The disclosure would unreasonably disclose personal information about a third party, including a deceased individual.
 - 8.1.2 The disclosure contains the trade secrets of a third party.
 - 8.1.3 The disclosure is likely to cause harm to the commercial or financial interests of a third party.
 - 8.1.3 The disclosure would put the third party at a disadvantage during contractual negotiations.
 - 8.1.4 The disclosure would be prejudicial to a third party in terms of commercial competition.
 - 8.1.5 The disclosure would constitute a breach of a duty of confidence owed to a third party.
 - 8.1.6 The disclosure could reasonably endanger the life or physical safety of an individual.
 - 8.1.7 The information is protected by legal privilege.
 - 8.1.8. The disclosure would seriously disadvantage research carried by or on behalf of a third party, and would identify the third party, a person carrying out the research, and/or the subject matter of the research.



8.2 Apcan **may refuse** an application for information if (subject to certain exclusions):

- 8.2.1 The disclosure is likely to prejudice or impair the security of a building, structure, or system, including a computer or communication system.
 - 8.2.2 The disclosure may compromise the methods, systems, plans, or procedures of an individual that is included in a witness protection scheme.
 - 8.2.3 The disclosure will compromise the safety of the public, or any part of the public.
 - 8.2.4 The disclosure contains the trade secrets of Apcan.
 - 8.2.5 The disclosure is likely to cause harm to the commercial or financial interest of Apcan.
 - 8.2.6 The disclosure would put Apcan at a disadvantage during contractual negotiations.
 - 8.2.7 The disclosure would be prejudicial to Apcan in terms of commercial competition.
 - 8.2.8 The disclosure relates to a computer program, as defined in Section 1 (1) of the Copyright Act, No 98 of 1978, owned by Apcan.
 - 8.2.9 The disclosure would seriously disadvantage research carried by Apcan or would identify the identity of a person carrying out the research on behalf of Apcan and/or the subject matter of the research.
- 8.3 All applications will be assessed on their own merits and following the applicable legislation.
- 8.4 If a requested record cannot be found alternatively does not exist, the Information Officer shall, by way of an affidavit, notify the requester that access to the record cannot be provided. Such notice shall be deemed refusal of a request, but should the record be found at later stage access shall be given to the requester unless the application is refused on other allowable grounds.
- 8.5 If a requester or third party is dissatisfied with a refusal to grant access, he/she may, within 30 (thirty) days of notification of the decision, apply to the appropriate Court for reliance.

9. Protection of Personal Information processed by Apcan

- 9.1 The purpose of processing your personal information:
- 9.1.1 We will only use your personal information when the law also us to use the information.
 - 9.1.2 Most commonly we use your personal information in the following circumstances:
 - 9.1.2.1 Consent: Where you have given us your consent to use the information.
 - 9.1.2.2 Contract Performance: the information is necessary to enter a contract; with you and during our contract performance to you.
 - 9.1.2.3 Legal Obligation: We must use your personal information to comply with a legal obligation.
 - 9.1.2.4 Legitimate interest: Where we as a Responsible Party have established a legitimate interest to process the information and our reasons for using the information outweighs the prejudice to your rights as a data subject.



9.1.2.5 Legal Claim: Where your information is necessary to prosecute, defend or make a claim against you or another third party.

9.1.2.6 Your Interest: In the instances where it becomes necessary to use your personal information to protect your instances or someone else's interest.

9.1.2.7 Public Interest: Where it is in the public interest to use your personal information.

10. The categories of data subjects and the information we process

10.1 We process the personal information of the following categories of data subjects:

Category of Data Subject	Personal Information Processed
Employees	Name & Surname Contact Details Gender Age/Race Marital Status Details of Spouse and Dependents Address Identity Number and copy of your Identity Documents/passport/work permit Employment History and references Banking details Details of third parties in whose favor deductions are made Employment Contract Employment Equity Details Medical Aid Records Pension and/or Provident Fund details Salary & Benefit Details Performance Appraisals Disciplinary Records Injuries of Duty Records of your leave Training Records Proof of educational and professional memberships Proof of Firearms Licenses Biometric data (fingerprints) Criminal Records
	Polygraphs Test Results Drug and/or alcohol tests CCTV recordings/images Psychometric Testing



Prospective Employees	Name Surname Contact Details Scholastic, Educational, and other training done Employment History Current Employer Current Salary
Clients	Name Registration Number Identity Number (if in the case of a natural person) Details of a Contact person Contact Details including phone & fax number, postal address, email address Physical Address Banking Details
Prospective Clients (which may include employees)	Name Contact Details Location
Vendors/Suppliers/Subcontractors/Consultants and other professional business advisors	Name Registration Number Identity Number (natural persons) Contact Person Details Contact Details including phone & fax number, postal address, email address Physical Address Banking Details
Members of the Public	Information collected via CCTV monitoring and investigations as a security service provider

11. With whom we share your personal information

- 11.1 Apcan Services Group is comprised of various businesses, and we share and process your information within our group of companies.
- 11.2 We also share your information, to the extent necessary to third parties.
 - 11.2.1 Our professional service advisors including legal, financial, risk management, bankers, auditors, and other advisors used in the ordinary course of our business.
 - 11.2.2 Information collected is from time to time shared with our customers as part of our service offering.
 - 11.2.3 Our insurers and insurance brokers.
 - 11.2.4 Other third-party external service providers and or advisers including marketing and Information Technology service providers.
 - 11.2.5 Regulators and law enforcement agencies to the extent required by any law and or regulation.



12. Cross-Border flows of Personal Information

12.1 Personal information we hold about you may in certain circumstances be transmitted transborder to other countries as some of the technology solutions we use are hosted outside of South Africa. We endeavor to only transfer personal information to countries that have adequate data protection law and if not ensure that all reasonable efforts are made by these service providers, as processors, to secure the confidentiality and integrity of the data.

13. A Description of the information security measures to be implemented by Apcan

13.1 As a service provider that aims to secure your assets, we will also take all reasonable physical, technical, and managerial measures to protect your personal information from unlawful access, use, disclosure, or destruction.

13.2 Our measures include but are not limited to implementing appropriate access controls, investing in our information security capabilities, and keeping into consideration best industry practices.

13.3 To this end Apcan is in the process of implementing ISO270001 standards and obtaining certification.

13.4 Access to your data is only permitted amongst our employees and agents on a need-to-know basis and subject to contractual confidentiality obligations. Our staff receives regular communications relating to POPIA and the role that they play when processing personal information. Staff receives various face-to-face training as well as training via an e-learning platform on an ongoing basis.



APPENDIX A: SUBSIDIARIES OF THE APCAN SERVICES GROUP

- 1. Teflon Connect (Pty) Ltd
Registration Number: 2017/483924/07**
- 2. CRM (Countless Recovery Management)
Registration Number: 2017/666277/07**
- 3. Kodiso Services (Pty) Ltd
Registration Number: 2017/524712/07**
- 4. MCE (Monryn Civil and Engineering)
Registration Number: 2018/212818/07**
- 5. SFA (Strategic Financial Alliances)
Registration Number: 2019/189884/07**
- 6. Storm Risk Consultants t/a SRC Investigations
Registration Number: 2008/142953/23**



REPUBLIC OF SOUTH AFRICA

FORM C
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)) [Regulation 10]

A. Particulars of private body

The Head:

B. Particulars of the person requesting access to the record

Full names and surname:

.....

Identity number:

Grid for identity number input

Postal address:

.....

Telephone number: (.....) Fax number: (.....)

E-mail address:

Capacity in which request is made, when made on behalf of another person



C. Particulars of a person on whose behalf request is made

Full names and surname:

.....

Identity number:

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A. Particulars of record

- (a) 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.
- (b) If the provided space is inadequate, please continue a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

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.....

2. Reference number, if available:

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.....

.....

3 Any further particulars of record:

.....

.....

.....

.....



E. Fees

- (a) 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.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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 of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

.....

.....

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.....

F. Form of access to a record

If you are prevented by a disability to read, view, or listening to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

<p>Disability:</p>	<p>Form in which record is required:</p>
<p>Mark the appropriate box with an X.</p> <p>NOTES: Compliance with your request for access in the specified form may depend on the form in which the record is available. Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</p>	

1. If the record is in written or printed form:					
	Copy of a record*		Inspection of record		
2. If record consists of visual images - (This includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	View the images		Copy of the images*	Transcription of the images*	
3. If record consists of recorded words or information which can be reproduced in sound:					
	Listen to the soundtrack (audio cassette)		Transcription of soundtrack* (written or printed document)		



4. If a record is held on a computer or in an electronic or machine-readable form:					
	a printed copy of record*		a printed copy of information derived from the record*		Copy in computer-readable form* (Stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
--	-----	----

G. Particulars of right to be exercised or protected

If the provided space is a folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

.....

3. Explain why the record requested is required for the exercise or protection of the aforementioned right:

.....

H. Notice of decision regarding a request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner, and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

.....