

**Shandon Business Solutions  
(Pty) LTD  
Promotion of Access to  
Information Act (“PAIA”)  
Manual**

Policy Owner	Shandon Business Solutions Information Officer
Policy Custodian	Warren Barratt
Approved by	EOH Group Information Officer
Approval/Effective date	1 January 2022
Next Review Date	As required for updates
Document name and version	Shandon Business Solutions PAIA Manual V1
Printed version	This document is only valid for 24hrs after print date. It is the responsibility of the user to ensure that the printed document corresponds with the original master copy as published

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# 1. Right of Access to Information

## 1.1. Introduction

1.1.1. The 1996 South African Constitution, by providing a statutory right of access on request to any record held by the state as well as access to records held by private bodies, entrenches the fundamental right to information.

The Promotion of Access to Information Act 2 of 2000 (“the Act”), which came into effect on 9 March 2001, seeks to advance the values of transparency and accountability in South Africa and provides the mechanism for requesters to exercise and protect their constitutional right to request access to a record.

1.1.2. The Act establishes the following statutory rights of requesters to any record of a private body if:

- That record is required for the exercise or protection of any of his or her legal rights;
- That requester complies with all the procedural requirements; and
- Access is not refused in terms of any ground referred to in the Act.

In terms of the Act private bodies are required to publish a manual to assist requesters who wish to request access to a record.

## 1.2. Who may request access to information:

1.2.1. The Act provides that a requester is only entitled to access to a record if the record is required for the exercise or protection of a right. Only requests for access to a record, where the requester has satisfied the Information Officer that the record is required to exercise or protect a right, will be considered. A requester may act in different capacities in making a request for a record. This will influence the amount to be charged when a request has been lodged.

1.2.2. Requesters may make a request as:

- A personal requester who requests a record about him/herself;
- An agent requester who requests a record on behalf of someone else with that person’s consent and where it is required for the protection of that person’s legal right;
- A third-party requester who requests a record about someone else with that person’s consent and where it is required for the protection of that person’s legal right; and
- A public body who may request a record if:
  - It fulfills the requirements of procedural compliance;
  - The record is required for the exercise or protection of a right; and
  - No grounds for refusal exist.

## 1.3. Contact Details of SHANDON Information Officer: Sec 51 (1) (a)

1.3.1. The Chief Executive Officer of EOH, under whom Shandon Business Solutions is a wholly owned subsidiary, has delegated his powers to the Information Officer below in terms of the Act to handle all requests on Shandon Business Solutions’ behalf and ensure that the requirements of the Act are administered in a fair, objective and unbiased manner.

### Shandon Business Solutions contact details

Information Officer:	Warren Barratt
Physical Address:	2 Augrabies Road Waterfall Office Park Midrand, 1682
Postal Address:	PO Box 59 Bruma, 2026
Email	informationofficer@shandonbiz.com

#### 1.4. Policy with regards to Confidentiality and Access to Information:

- 1.4.1. Shandon Business Solutions will protect the confidentiality of information provided to it by third parties, subject to Shandon Business Solutions' obligations to disclose information in terms of any applicable law or a court order requiring disclosure of the information. If access is requested to a record that contains information about a third party, Shandon Business Solutions is obliged to attempt to contact this third party to inform them of the request.
- 1.4.2. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted, or not.

#### 1.5. Guidance to Requesters on how to use the Act:

- 1.5.1. Guidelines in terms of section 10 of PAIA that will facilitate ease of use of the Act for Requesters can be obtained from the Information Regulator of South Africa as set out below:

<b>Postal Address:</b> Information Regulator of South Africa P.O Box 31533, Braamfontein, Johannesburg, 2017	<b>Physical Address:</b> JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001
General enquiries email address: <a href="mailto:inforeg@justice.gov.za">inforeg@justice.gov.za</a>	
Complaints can be directed to: <a href="mailto:complaints.IR@justice.gov.za">complaints.IR@justice.gov.za</a>	

The Information Regulator PAIA guide is at <https://justice.gov.za/inforeg/docs.html#docs>

## 2. EOH Group Structure

### 2.1. Scope

- 2.1.1. This Manual has been prepared in respect of Shandon Business Solutions, a wholly owned subsidiary of EOH Holdings Limited.

### 2.2. EOH Group of Companies Profile and Structure

- 2.2.1. EOH is the largest implementer of enterprise applications and has a wide range of Outsourcing, Cloud, Managed Services, Industrial Technologies and Business Process Outsourcing ('BPO') solutions.
- 2.2.2. EOH's purpose is to provide the technology, knowledge, skills and organizational ability critical to Africa's development and growth; and to be an ethical and relevant force for good and to play a positive role in society, beyond normal business practice.

- 2.2.3. EOH’s operating model is two dimensional, focused on key business areas and industry verticals. EOH offers solutions across the spectrum through a simple ‘Design, Build and Operate’ approach and is able to offer its customers tailored, flexible and robust solutions.
- 2.2.4. EOH’s key business areas are Applications, IT Management, IT outsourcing, Industrial Technologies and Business Process Outsourcing (BPO). A key differentiator in our model is the specialist industry expertise that we provide through our industry verticals. In this way, EOH provides high value, end-to-end solutions across the spectrum and consistently delivers value to clients through its deep industry expertise, an understanding of clients’ business and a ‘Right 1<sup>st</sup> Time’ approach to delivery.

### 3. Classes of Records

#### 3.1. Automatic Disclosure: Sec 51 (1) (c) – Records automatically available to the Public

- 3.1.1. No notice has been published in terms of section 52 of the Act.

#### 3.2. Records available in accordance with other legislation – PAIA Sec 51 (1)(d)

- 3.2.1. Where applicable to its operation, Shandon Business Solutions also retains Records and documents in terms of legislation listed below for the relevant periods as provided in the applicable legislation. Please note that the Records referred to on the listed legislation below are not exhaustive and as such, each request for access to Record will be treated uniquely with consideration of applicable legislation, procedure and policy. Records are kept in accordance with such other legislation as applicable which includes, but is not limited to:

Employee-Employer relationship	<ul style="list-style-type: none"> <li>- Basic Conditions of Employment Act, 75 of 1997</li> <li>- Compensation of Occupational Injuries and Diseases Act, 130 of 1993</li> <li>- Employment Equity Act, 55 of 1998</li> <li>- Labour Relations Act, 66 of 1995</li> <li>- Occupational Health and Safety Act, 85 of 1993</li> <li>- Disaster Management Act, 57 of 2002</li> <li>- Unemployment Insurance Act, 63 of 2001</li> <li>- Skills Development Act 97 of 1998</li> <li>- Pension Funds Act, 24 of 1956</li> </ul>
Revenue/ Income	<ul style="list-style-type: none"> <li>- Value Added Tax Act, 89 of 1991</li> <li>- Income Tax Act, 58 of 1962</li> <li>- Skills Development Levies Act 9 of 1999</li> <li>- Tax Administration Act, 28 of 2011</li> <li>- Taxation Laws Amendment Act (latest amendment Act)</li> </ul>
General	<ul style="list-style-type: none"> <li>- Protection of Personal Information Act, 4 of 2013</li> <li>- Broad-Based Black Empowerment Act, 53 of 2003</li> <li>- Companies Act, 71 of 2008</li> </ul>

	<ul style="list-style-type: none"> <li>- Constitution of the Republic of South Africa Act, 108 of 1996</li> <li>- Copyright Act, 98 of 1978</li> <li>- Competition Act 89 of 1998</li> <li>- Consumer Protection Act 68 of 2008</li> <li>- Electronic Communications and Transaction Act; 25 of 2002</li> </ul>
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### 3.3. Records held by Shandon Business Solutions: Sec 51 (1) (e) – Record Subjects and Categories

As part of EOH Holdings Limited group, much of this is handled by Group systems. Shandon Business Solutions does form part of group with regards to, and is incorporated in, the following (except where explicitly stated below):

In addition, the information may be classified and grouped according to Records relating to the following subjects and categories. It is also recorded that the accessibility of the documents listed herein below, may be subject to the grounds of refusal set out hereinafter:

Corporate Secretariat and Governance	<ul style="list-style-type: none"> <li>- Applicable Statutory Documents (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Annual Reports</li> <li>- Board of Directors and Board Committee Terms of Reference</li> <li>- Codes of Conduct</li> <li>- Board Meeting Minutes for Shandon Business Solutions</li> <li>- Legal Compliance Records (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Memoranda of Incorporation</li> <li>- Group Policies and Procedures (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Statutory Returns to Relevant Authorities (both EOH Holdings and Shandon Business Solutions as appropriate)</li> </ul>
Financial Division	<ul style="list-style-type: none"> <li>- Policies and Procedures (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Accounting Records (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Annual Financial Statements</li> <li>- Audit Reports (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Capital Expenditure Records (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Invoices and Statements (both EOH Holdings and Shandon Business Solutions as appropriate)</li> </ul>

	<ul style="list-style-type: none"> <li>- Management Reports (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Purchasing Records (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Sale and Supply Records (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Tax Records and Returns (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Treasury Dealing (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Transactional Records (both EOH Holdings and Shandon Business Solutions as appropriate)</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>- Education and Training Records (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Employee Benefit Records</li> <li>- Employment Contracts (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Employment Equity Records</li> <li>- Employee Information (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Employee Share Option Scheme</li> <li>- Policies and Procedures (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Group Life</li> <li>- Leave Records</li> <li>- Medical Records</li> <li>- Pension and Retirement Funding Records</li> <li>- Study assistance scheme/s (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Tax Returns of employees</li> <li>- UIF Returns</li> <li>- Learning and Development</li> </ul>
Information Technology	<ul style="list-style-type: none"> <li>- Hardware and Software Packages</li> <li>- Policies and Procedures</li> <li>- Page 11 of 32 Version 1.4</li> <li>- Internal Systems Support</li> <li>- Licenses</li> <li>- Operating Systems</li> </ul>
Legal	<ul style="list-style-type: none"> <li>- Complaints, pleadings, briefs and other documents pertaining to any actual or pending litigation, arbitration or investigation (both EOH Holdings and Shandon Business Solutions as appropriate)</li> </ul>

	<ul style="list-style-type: none"> <li>- Material licenses, permits and authorizations (both EOH Holdings and Shandon Business Solutions as appropriate)</li> </ul>
Sales, Marketing and Communication	<ul style="list-style-type: none"> <li>- Brochures, Newsletters and Advertising Material (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Client Information (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Marketing Brochures (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Marketing Strategies (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Product Brochures (both EOH Holdings and Shandon Business Solutions as appropriate)</li> <li>- Policies and Procedures (both EOH Holdings and Shandon Business Solutions as appropriate)</li> </ul>

### 3.4. Other Information

- 3.4.1. Shandon Business Solutions may possess information and Records pertaining to other parties, including and without limitation: suppliers/ holding/ sister companies, joint ventures and service providers.
- 3.4.2. If Shandon Business Solutions searches for a Record and it is believed that the Record either does not exist or cannot be found, the Requester will be Notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the Record.

### 3.5. Personal Information

- 3.5.1. Shandon Business Solutions may hold Personal Information of the following types of Data Subjects: Employees, clients, suppliers, holding or sister companies, joint ventures and/ or service providers or other organisations and persons.

## 4. Access Procedure and Requests

The purpose of this section is to provide requesters with sufficient guidelines and procedures to facilitate a request for access to a record held by SHANDON.

It is important to note that an application for access to information can be refused in the event that the application does not comply with the procedural requirements of the Act. In addition, the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 Chapter 4 of the Act.

If it is reasonably suspected that the requester has obtained access to the Shandon Business Solutions records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

#### 4.1. Guidance on Completion of Prescribed Access Form: Sec 51 (1) (e)

4.1.1. In order for SHANDON to facilitate your access to a record you need to complete the attached prescribed access form attached as Annexure B. Please take note that the prescribed access form must be completed in full, failure to do so will result in the process being delayed until such additional information is provided. SHANDON will not be held liable for delays due to receipt of incomplete forms. Due cognisance should be taken of the following instructions when completing the Access Request Form because the Information Officer shall not process any request for access to a record until satisfied that all requirements have been met:

- The Access Request Form must be completed in the English language.
- Proof of identity is required to authenticate the requester's identify. If the requester acts as an agent requester, the requester shall provide proof of the identity of the person on whose behalf the request is made, the authority or mandate given to the requester by such person and proof of the identity of the requester as provided above.
- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state "N/A" in response to that question.
- If there is nothing to disclose in reply to a particular question, state "nil" in response to that question.
- If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional attached folio.
- When the use of an additional folio is required, precede each answer thereon with the title applicable to that question.

#### 4.2. Submission of Prescribed Access Form

4.2.1. The completed Access Request Form must be submitted either via conventional mail, e-mail or fax and must be addressed to the Information Officer.

#### 4.3. Payment of Prescribed Fees

4.3.1. Payment details can be obtained from the Information Officer and payment can be made either via a direct deposit, by bank guaranteed cheque or by postal order (no credit card payments are accepted). Proof of payment must be supplied. Four types of fees are provided for in terms of the Act:

- **Request fee:** An initial, non-refundable R57.00 (incl. VAT) is payable on submission. This fee is not applicable to Personal Requesters, referring to any person seeking access to records that contain their personal information.
- **Reproduction fee:** This fee is payable with respect to all records that are automatically available.
- **Access fee:** If the request for access is successful an access fee may be required to reimburse Shandon Business Solutions for the costs involved in the search, reproduction and/or preparation of the record and will be calculated based on the Prescribed Fees.
- **Deposit:** A deposit of one third (1/3) of the amount of the applicable access fee, is payable if Shandon Business Solutions receives a request for access to information held on a person other than the requester himself/herself and the preparation for the record will take more than six (6) hours. In the event that access is refused to the requested record, the full deposit will be refunded to the requester.

Refer to section 6 "Prescribed Fees" for a detailed breakdown of fees.

#### 4.4. Notification

- 4.4.1. Shandon Business Solutions will within thirty (30) days of receipt of the request decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 4.4.2. The thirty (30) day period within which Shandon Business Solutions has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty (30) days, if the request is for a large volume of information, or the request requires a search for information held at another office of Shandon Business Solutions and the information cannot be reasonably be obtained within the original thirty (30) day period. Shandon Business Solutions will notify the requester in writer should an extension be sought.
- 4.4.3. If the request for access to a record is successful, the requester will be notified of the following:
- The amount of the access fee payable upon gaining access to the record;
  - An indication of the form in which the access will be granted; and
  - Notice that the requester may lodge an application with a court against the payment of the access fee and the procedure, including the period, for lodging the application.
  - If the request for access to a record is not successful, the requester will be notified of the following:
    - Adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal); and
    - That the requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

#### 4.5. Records that cannot be found or do not exist

If Shandon Business Solutions has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

## 5. Grounds for refusal of access to records and appeal

### 5.1. Grounds for Refusal: Chapter 4

The thirty (30) day period within which the Information Officer is required to reply to a request, as stipulated in the Act, shall commence only once a requester has complied with all the requirements of the Act in requesting access to a record, to the satisfaction of the Information Officer.

- 5.1.1. Requests may be refused on the following grounds, as set out in the Act:
- Mandatory protection of privacy of a third party who is a natural person, including a deceased person, which would involve the unreasonable disclosure of personal information of that natural person;
  - Mandatory protection of commercial information of a third party or EOH, if the record contains:
    - Trade secrets of the third party or Shandon Business Solutions;
    - Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party or SHANDON; and
    - Information disclosed in confidence by a third party to SHANDON if the disclosure could put that third party to a disadvantage or commercial competition.

- Mandatory protection of certain confidential information of a third party if disclosure of the record would result in a breach of a duty of confidence owed to that party in terms of an agreement;
- Mandatory protection of the safety of individuals, and the protection of property;
- Mandatory protection of records privileged from production in legal proceedings, unless the legal privilege has been waived; and
- Mandatory protection of research information of a third party and of SHANDON.

## 5.2. Appeal

- 5.2.1. If a requester is aggrieved by the refusal of the Information Officer to grant a request for a record, the requester may, within thirty (30) days of notification of the Information Officer's decision, apply to court for appropriate relief.

## 6. Prescribed Fees:

### 6.1. Fees in Respect of **Public Bodies** (excluding VAT)

Item	Description	Amount
1.	The request fee payable by every requester	R100.00
2.	Photocopy of A4-size page	R1.50 per page or part thereof
3.	Printed copy of A4-size page	R1.50 per page or part thereof
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by requester) (ii) Compact disc • If provided by requester • If provided to the requester	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service Provider
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (i) Flash drive (to be provided by requester) (ii) Compact disc • If provided by requester • If provided to the requester	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation To not exceed a total cost of	R100.00 R300.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, email, or any other electronic transfer	Actual expense if any.

## 6.2. Fees in Respect of **Private Bodies** (excluding VAT)

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on: (iii) Flash drive (to be provided by requester) (iv) Compact disc • If provided by requester • If provided to the requester	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service Provider
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (iii) Flash drive (to be provided by requester) (iv) Compact disc • If provided by requester • If provided to the requester	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8
11.	Postage, email, or any other electronic transfer	Actual expense if any

A request fee of R50.00 (excluding VAT) is payable upfront where a requester submits a request for access to information on anybody else other than a requester.

## 7. Sharing of Personal Information

### 7.1. Shandon Business Solutions may share personal information with:

- Other companies forming part of the EOH group of companies located outside of South Africa;
- Services providers who perform services on behalf of the EOH Group; and
- Third party suppliers

### 7.2. Shandon Business Solutions security measures to protect personal information with:

- 7.2.1. Shandon Business Solutions will takes the security of your data seriously and therefore reasonable technical and organisational measures have been implemented to protect to protect personal information. SHANDON has internal policies and controls in place to ensure that you data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

7.2.2. Shandon Business Solutions will take steps to ensure that third party providers who process personal information on behalf of SHANDON apply adequate safeguards as required in terms of POPIA.

### 7.3. Transborder Flows of Personal Information: PAIA Sec 51 (1)(c)(iv)

7.3.1. Shandon Business Solutions may from time to time transfer personal information to another country for the purposes of rendering services to employees and customers. Shandon Business Solutions will take the necessary steps to ensure that services providers and third-party operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.  
Kindly contact the Information Officer if more information in this regard is required

### 7.4. Purpose of Processing of Personal Information

7.4.1. Shandon Business Solutions processes Personal Employee Information (and potential employees) which includes but it is not limited to the following purposes:

- Rendering of services to our customers
- Employee administration
- Providing or managing any information on products
- Transacting with our suppliers
- Maintaining customer records
- Recruitment purposes
- Apprenticeship and bursary purposes
- Travel purposes
- General administration
- Financial and tax purposes
- Legal purposes
- Health and safety purposes
- Visitor access monitoring purposes
- Managing the premises and facilities
- Investigating of and preventing fraud
- Debt recovery and responding to website enquires

### 7.5. Types of Personal Information

Categories individuals and juristic entities	Categories of personal information held	Availability
Employees	<ul style="list-style-type: none"> <li>• ID number</li> <li>• Contact details</li> <li>• Physical and postal address</li> <li>• Date of birth</li> <li>• Age</li> </ul>	Not automatically available

	<ul style="list-style-type: none"> <li>• Disability</li> <li>• Information</li> <li>• Employment history</li> <li>• Criminal/background checks</li> <li>• Fingerprints</li> <li>• CVs</li> <li>• Education history</li> <li>• Banking details</li> <li>• Income tax reference number</li> <li>• Remuneration and benefit information (including medical aid, pension/provident fund information)</li> <li>• Details related to employee performance</li> <li>• Disciplinary procedures</li> <li>• Employee disability information</li> <li>• Employee pension and provident fund information</li> <li>• Employee contracts</li> <li>• Employee performance records</li> <li>• Physical access records</li> <li>• CCTV records</li> <li>• Health and safety records</li> <li>• Time and attendance records</li> </ul>	
Suppliers/Service Providers	<ul style="list-style-type: none"> <li>• Entity name</li> <li>• registration number</li> <li>• income tax number</li> <li>• contact details for representative persons</li> <li>• FICA documentation</li> <li>• BBB-EE certificates</li> <li>• Invoices</li> <li>• Contractual documentation</li> </ul>	Not automatically available
Directors and Shareholders	Name, Surname, ID numbers, Financial information as required for statutory reporting	Not automatically available
New Job Applicants	<ul style="list-style-type: none"> <li>• Name</li> <li>• Surname</li> <li>• Address</li> </ul>	Not automatically available

	<ul style="list-style-type: none"> <li>• Contact details</li> <li>• Email address</li> <li>• Telephone number</li> <li>• Details of qualifications</li> <li>• Skills</li> <li>• Experiences and employment history</li> <li>• Information about your current level of remuneration, including benefit entitlements, whether or not you have a disability for which EOH needs to make reasonable adjustments during the recruitment process, and information about your entitlement to work in South Africa</li> </ul>	
Website Visitors	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Company name</li> <li>• Job title and telephone number</li> </ul>	
Visitors	Physical access records Electronic access records scans and CCTV records	Not automatically available

**7.6. Recipients of categories of recipients to whom the personal information may be supplied**

This table refers to data for employees, or prospective employees. There may be additional recipients not recorded here.

<b>Category of personal information</b>	<b>Recipients or Categories of Recipients to whom the personal information may be supplied</b>
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

**8. Security measures to protect Personal Information- PAIA Sec 51 (1)(c)(v)**

It should be noted that Shandon Business Solutions makes use of EOH Group systems and security and as such the following applies (where these are not yet implemented, they are underway or planned):

- Physical security measures
  - Access control to offices;
  - Additional access control to areas where hard copies are stored.
- Cyber security measures
  - Perimeter security (Controlled access per application and port)
  - Controlled network segregation.
  - Endpoint encryption
  - Server encryption
  - Anti-virus for endpoints and servers includes Host Intrusion Prevention System (HIPS) and Endpoint detection and response (EDR)
  - Data classification (underway)
  - Data Loss Prevention (DLP) and Zero-Trust solution (underway)
  - Password control to devices where electronic information is stored
  - Mobile Device Management for accessing corporate data via mobile devices.
- Training in information security
 

All Employees of Shandon Business Solutions have received training on:

  - The protection of Personal Information; and
  - Cybersecurity.
- Policies in information security
 

EOH has adopted, among others, the following group policies, relating to information security:

  - Information Security Policy;
  - Information Security Incident Management Policy;
  - Data Encryption Policy;
  - Information Security Acceptable Use Policy;
  - Information and Systems Access Policy;
  - Password Management Policy;
  - IT Security Management Policy;
  - IT Mobile and Personal Device Management Security Policy;
  - Data and Record Retention and Disposals Policy;
  - Information, Data Management and Control Policy;
  - Vulnerability Management Policy;
  - Information Asset Classification and Handling Management Policy;
  - Business Continuity Policy; and
  - IT Hardware and Software Asset Management Policy.

## 9. Availability of Shandon Business Solutions PAIA Manual

A Public Copy is available for inspection:

- On the group website at [iOCO.tech](http://iOCO.tech) or download a copy here: PAIA Manual
- Shandon Business Solutions (Block D, Gilloolys View, office park, Osborne Lane, Bedfordview, 2007) for public inspection during normal business hours;
- To any person upon request and upon the payment of a reasonable prescribed fee; and
- To the Information Regulator upon request.

A fee for a copy of the Manual, as contemplated in annexure B (see section 6 of this manual) of the Regulations, shall be payable per each A4-size photocopy made.

## 10. Updating of this PAIA Manual

The Shandon Business Solutions Information Officer will on a regular basis update this manual

## 11. Issued and authorised by

This PAIA manual is issued and authorised by the following:

Name:	Warren Barratt
Role:	Information Officer, Shandon Business Solutions
Date:	31 December 2021

## ANNEXURE A

### 1. Request for access to record form

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**  
**Shandon Business Solutions**  
**P O Box 59**  
**Bruma**  
**2026**

Email: **informationofficer@shandonbiz.com**

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person

PERSONAL INFORMATION		
Full names		
Identify number		
Capacity in which request is made (when made on behalf of another person)		
Postal address		
Street address		
E-mail address		
Contact numbers	Landline	
	Cellular	
PERSON ON WHOSE BEHALF REQUEST IS MADE (if applicable)		
Full names		
Identify number		
Postal address		
Street address		
E-mail address		
Contact numbers	Landline	
	Cellular	

<b>PARTICULARS OF RECORD REQUESTED</b>	
<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	
<b>TYPE OF RECORD</b>	
<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	
<b>FORM OF ACCESS</b>	
<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 (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	
<b>MANNER OF ACCESS</b>	
<i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body (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)	
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>		
<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <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:		
<b>FEES</b>		
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 for exemption of any fee		

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:

Mark with an "X"

Postal address                       Email address

Signed at \_\_\_\_\_ on 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**

## 2. Internal appeal form

### Internal remedies:

Requestors may appeal the ruling if the request for information is refused, and/or the requester is not satisfied with the answer supplied. An appeal form, attached below, must be completed with adequate reasons for the appeal and submitted to the Information Officer within 30 (thirty) days of the notification of the decision. The Information Officer, or Group Information Officer of the Holding Company will review the appeal collectively and decide on the validity thereof. The matter may be escalated to Legal if deemed necessary. The result will be communicated back to the data subject within a reasonable timeframe, which will be noted upon receipt of the appeal.

Reference Number (of request if known): .....

PARTICULARS OF PUBLIC BODY		
Name of Public Body		
Name and surname of Information Officer:		
PARTICULARS OF COMPLAINANT WHO LODGES THE INTERNAL APPEAL		
Full names		
Identify number		
Postal address		
Contact numbers	Landline	
	Cellular	
Email address		
Is the internal appeal lodged on behalf of another person?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
If answer is "yes", capacity in which an internal appeal on behalf of another person is lodged: <i>(Proof of the capacity in which appeal is lodged, if applicable, must be attached.)</i>		
PARTICULARS OF PERSON ON WHOSE BEHALF THE INTERNAL APPEAL IS LODGED <i>(If lodged by a third party)</i>		
Full names		
Identify number		
Postal address		
Contact numbers	Landline	
	Cellular	
Email address		

DECISION AGAINST WHICH THE INTERNAL APPEAL IS LODGED <i>(mark the appropriate box with an "X")</i>	
Refusal of request for access	
Decision regarding fees prescribed in terms of section 22 of the Act	
Decision regarding the extension of the period within which the request must be dealt with in terms of section 26(1) of the Act	
Decision in terms of section 29(3) of the Act to refuse access in the form requested by the requester	
Decision to grant request for access	
GROUNDS FOR APPEAL <i>(If the provided space is inadequate, please continue on a separate page and attach it to this form. all the additional pages must be signed)</i>	
State the grounds on which the internal appeal is based:	
State any other information that may be relevant in considering the appeal:	

You will be notified in writing of the decision on your internal appeal. Please indicate your preferred manner of notification:

**Mark with an "X"**

Postal address

Email address

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_

\_\_\_\_\_  
**Signature of Appellant / Third party**

**FOR OFFICIAL USE  
OFFICIAL RECORD OF INTERNAL APPEAL**

Reference number:	
Request received by: <i>(State Rank, Name and Surname of Information Officer)</i>	
Date received:	
Appeal accompanied by the reasons for the information officer's decision and, where applicable, the particulars of any third party to whom or which the record relates, submitted by the information officer:	<input type="checkbox"/> Yes <input type="checkbox"/> No
OUTCOME OF APPEAL	
Refusal of request for access. Confirmed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
New decision (if not confirmed)	

Fees (Sec 22). Confirmed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	New decision (if not confirmed)	
Extension (Sec 26(1)). Confirmed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	New decision (if not confirmed)	
Access (Sec 29(3)). Confirmed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	New decision (if not confirmed)	
Request for access granted. Confirmed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	New decision (if not confirmed)	

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
**Relevant Authority**

### 3. Complaint Form

**NOTE:**

1. This form is designed to assist the Requester or Third Party (hereinafter referred to as “the Complainant”) in requesting a review of a Public or Private Body’s response or non-response to a request for access to records under the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) (“PAIA”). Please fill out this form and send it to the following email address: PAIAComplaints@infoRegulator.org.za or complete online complaint form available at <https://www.justice.gov.za/inforeg/>.
2. PAIA gives a member of the public a right to file a complaint with the Information Regulator about any of the nature of complaints detailed in part F of this complaint form.
3. It is the policy of the Information Regulator to defer investigating or to reject a complaint if the Complainant has not first given the public or private body (herein after referred to as “the Body”) an opportunity to respond to and attempt to resolve the issue. To help the Body address your concerns prior to approaching the Information Regulator, you are required to complete the prescribed PAIA Form 2 and submit it to the Body.
4. A copy of this Form will be provided to the Body that is the subject of your complaint. The information you provide on this form, attached to this form or that you supply later, will only be used to attempt to resolve your dispute, unless otherwise stated herein.
5. The Information Regulator will only accept your complaint once you confirm having complied with the prerequisites below.
6. Please attach copies of the following documents, if you have them:
  - a. Copy of the form to the Body requesting access to records;
  - b. The Body’s response to your complaint or access request;
  - c. Any other correspondence between you and the Body regarding your request;
  - d. Copy of the appeal form, if your complaint relate to a public body;
  - e. The Body’s response to your appeal;
  - f. Any other correspondence between you and the Body regarding your appeal;
  - g. Documentation authorizing you to act on behalf of another person (if applicable);
  - h. Court Order or Court documents relevant to your complaint, if any.
7. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

CAPACITY OF PERSON/PARTY LODGING A COMPLAINT	
<input type="checkbox"/> Complainant personally <input type="checkbox"/> Representative of complainant <input type="checkbox"/> Third party	
PREREQUISITES	
Did you submit request (PAIA form) for access to record of a public/private body?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Has 30 days lapsed from the date on which you submitted your PAIA form?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did you exhaust all the internal appeal procedure against a decision of the Information officer of a public body?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Have you applied to Court for appropriate relief regarding this matter?	<input type="checkbox"/> Yes <input type="checkbox"/> No