





# PAIA MANUAL

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<b>Document No:</b> UNC-PPI-002	
<b>Version No:</b> 2	
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This PAIA Manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000.

### 1. INTRODUCTION

UNICA Iron & Steel (Pty) Limited (“UNICA” or the “Company”) conducts business as a leading manufacturer of light and medium structural steel located in Babelegi in the Northwest province of South Africa. This Promotion of Access to Information Manual (the “Manual”) provides an outline of the type of records and the personal information it holds and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (the “PAIA Act”). In addition, it explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (the “POPI Act”). The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by the private sector or public bodies if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest. Requests shall be made following the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in another section of the Manual.

### 2. LIST OF ACRONYMS AND ABBREVIATIONS:


2.1	‘CEO’	Chief Executive Officer
2.2	‘DIO’	Deputy Information Officer
2.3	‘IO’	Information Officer
2.4	‘Minister’	Minister of Justice and Correctional Services
2.5	‘PAIA’	Promotion of Access to Information Act No. 2 of 2000 (as amended)
2.6	‘POPIA’	Protection of Personal Information Act No.4 of 2013
2.7	‘Regulator’	Information Regulator
	‘Republic’	Republic of South Africa

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### 3. PURPOSE OF THE PAIA MANUAL

This PAIA Manual is useful for the public to:

- 3.1 Check the categories of records held by a body that is available without a person having to submit a formal PAIA request.
- 3.2 Have a sufficient understanding of how to request access to a record of the body, by describing the subjects on which the body holds records and the categories of records held on each subject.
- 3.3 Know the description of the records of the body which are available by any other legislation.
- 3.4 Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- 3.5 Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.
- 3.6 Know if the body will process personal information, the purpose of the processing of personal information, and the description of the categories of data subjects and the information or categories of information relating thereto.
- 3.7 Know the description of the categories of data subjects and the information or categories of information relating thereto.
- 3.8 Know the recipients or categories of recipients to whom the personal information may be supplied.
- 3.9 Know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 3.10 Know whether the body has appropriate security measures to ensure the confidentiality, integrity, and availability of the personal information which is to be processed.

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#### 4. CONTACT DETAILS:

*Company contacts in terms of PAIA section 51:*

The Information Officer  
UNICA Iron & Steel (Proprietary) Limited  
9<sup>th</sup> Street  
ERF 87  
Babelegi  
Pretoria  
South Africa  
Email: [info@unica.co.za](mailto:info@unica.co.za)

Website: [www.unica.co.za](http://www.unica.co.za)


Duly authorised persons: Information Officer and or Deputy Information Officers

*The Information Regulator, whose contact details are:*

JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg  
2001

P.O Box 31533  
Braamfontein  
Johannesburg  
2017

Email: [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za)  
Email: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)

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## 5. GUIDE ON HOW TO US PAIA


- 5.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated, and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 5.2 The Guide is available in each of the official languages and braille.
- 5.3 The aforesaid Guide contains the description of:
- 5.3.1. The objects of PAIA and POPIA.
  - 5.3.2. The postal and street address, telephone, and fax number and, if available, electronic mail address of:
    - 5.3.2.1. The Information Officer of every public body, and
    - 5.3.2.2. Every Deputy Information Officer of every public and private body is designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>.
  - 5.3.3. The manner and form of a request for:
    - 5.3.3.1. Access to a record of a public body contemplated in section 11<sup>3</sup>; and
    - 5.3.3.2. Access to a record of a private body contemplated in section 50<sup>4</sup>;
  - 5.3.4. The assistance available from the IO of a public body in terms of PAIA and POPIA.
  - 5.3.5. The assistance available from the Regulator in terms of PAIA and POPIA
  - 5.3.6. All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging:
    - 5.3.6.1. An internal appeal.
    - 5.3.6.2. A complaint to the Regulator; and
    - 5.3.6.3. An application with a court against a decision by the information officer of a public body, a decision on internal appeal, or a decision by the Regulator or a decision of the head of a private body.

<sup>1</sup> Section 17(1) of PAIA – For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.

<sup>2</sup> Section 56(a) of POPIA – Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

<sup>3</sup> Section 11(1) of PAIA – A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

<sup>4</sup> Section 50(1) of PAIA A requester must be given access to any record of a private body if: a) that record is required for the exercise or protection of any rights; b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

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The provisions of sections 14<sup>5</sup> and 51<sup>6</sup> require a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.

5.3.8. The provisions of sections 15<sup>7</sup> and 52<sup>8</sup> provide for the voluntary disclosure of categories of records by a public body and private body, respectively.

5.3.9. The notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid concerning requests for access; and

5.3.10. The regulations made in terms of section 92<sup>11</sup>.

5.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

5.5 A copy of the Guide is also available in the following official languages, for public inspection during normal office hours:

5.5.1. English

5.5.2. Afrikaans

5.5.3. Setswana

5.5.4. Sesotho

5.5.5. isiZulu

<sup>5</sup> Section 14(1) of PAIA – The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA – The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA – The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

<sup>8</sup> Section 52(1) of PAIA – The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

<sup>9</sup> Section 22(1) of PAIA – The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA – The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that – The Minister may, by notice in the Gazette, make regulations regarding –


(a) any matter which is required or permitted by this Act to be prescribed.

(b) any matter relating to the fees contemplated in sections 22 and 54.

(c) any notice required by this Act.

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

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## 6. CATEGORIES OF RECORDS THAT ARE AVAILABLE WITHOUT REQUIRING A FORMAL INFORMATION ACCESS REQUEST

Company records availability		
Departmental records	Subject	Classification No.
Marketing Department	Current Product/Service Information	1
	Public Corporate Records	1
	Media Releases	1
	Environmental Policy	1
	Website	1

## 7. CATEGORIES OF RECORDS THAT ARE AVAILABLE WITH A FORMAL INFORMATION ACCESS REQUEST


Company records availability		
Departmental records	Subject	Classification No.
Marketing Department	Current Product Information	1,4
	Public Corporate Records	1
	Launches and Events Records	4,5
	Media Releases	1
	Journalist records	4,5
	Environmental Policy	1
	Marketing and Future Product Strategies	12
	Customer Information and Database	4,5,12
	Customer Records	4
	HSE Department	Environmental Records
Health and Safety Records		4,5,9
HR Division	Employee Records	4,5,9
	Employment Contracts	4,5
	Personnel Guidelines	
	Policies and Procedures	12
	Employee Medical Records	4,5,8
	Employee Disability Insurance Records	4,5
	Employee Pension and Provident Fund Records	4,5
	Payroll Records	4,5
Financial Division	Recruitment Records	4,5
	Audited Financial Statements	12
	Tax Records (Company & Employees)	4,12
	Asset Register	12
	Supplier Records	4,5
	Management Accounts	12



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	Fleet Insurance Records	4,5
Legal/Compliance	General Contract Documentation	6,12
	Company Guidelines, Policies, and Procedures	12
	Intellectual Property Records	3
	Employee, customer, and supplier information	10
	Immovable Property Records	12
	Statutory Records	12
	Quality Records	12
Facilities Management	Physical Security Records	4,5
	Electronic Access & Identity Management	4,5
Risk Control	Complaints and Investigations Records	4,5

No.	Disclosure	Requirement(s)
1	Maybe Disclosed	Public Access Document
2	May not be Disclosed	Request after commencement of criminal or civil proceedings [s7]
3	Maybe Disclosed	Subject to copyright
4	Limited Disclosure	Personal Information that belongs to the requester
5	May not be Disclosed	Unreasonable disclosure of personal information or Natural person [s63(1)] or Juristic Person [POPI]
6	May not be Disclosed	6 Likely to harm the commercial or financial interests of third party [s64(a)(b)]
7	May not be Disclosed	Likely to harm the Company or third party in contract or other negotiations [s64(c)]
8	May not be Disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [s65]
9	May not be Disclosed	Likely to compromise the safety of individuals or protection of property [s66]
10	May not be Disclosed	Legally privileged document [s67]
11	May not be Refused	Environmental testing / investigation which reveals public safety / environmental risks [s64(2); s68(2)]
12	May not be Disclosed	Commercial information of Private Body [s68]
13	May not be Disclosed	Likely to prejudice research and development information of the Company or a third party [s69]
14	May not be Refused	Disclosure in the public interest [s70]

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## 8. PROCESSING OF PERSONAL INFORMATION

UNICA takes the privacy and protection of personal information very seriously and will only process personal information by the current South African privacy. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving, and deletion) will be applied to any personal information processed by UNICA.

a. The purpose of the processing of personal information by UNICA


We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information and/or services requested by data subjects.
- to help us identify data subjects when they contact UNICA.
- to maintain customer records.
- for recruitment purposes.
- for employment purposes.
- for apprenticeship purposes.
- for travel purposes.
- for general administration, financial, and tax purposes.
- for legal or contractual purposes.
- for health and safety purposes.
- to monitor access, secure, and manage our premises and facilities.
- to transact with our suppliers and business partners.
- to help us improve the quality of our services.
- to help us detect and prevent fraud and money laundering.
- to help us recover debts.
- to carry out analysis and customer profiling, and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

b. Categories of data subjects and personal information processed by UNICA:


The categories of data subjects and personal information processed by UNICA include the following:

- Customers and potential customers.
- Customer personal information.
- Customer contracts.
- Customer location information.
- Suppliers.
- Supplier personal information.
- Personal information of supplier representatives.
- Employees.
- Employee personal information.

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- Employee medical information.
- Employee disability information.
- Employee Pension and Provident Fund Information.
- Employee contracts.
- Employee performance records.
- Payroll records.
- Electronic access records.
- Physical access records.
- Surveillance records.
- Health and safety records.
- Training records.
- Employment history.
- Time and attendance records.
- Job applicants.
- Curriculum vitae and application forms.
- Criminal checks.
- Background checks.
- Children.
- Child’s medical information.
- Child’s information acquired for processing travel documents.
- Visitors Physical access records.
- Electronic access records and scans.
- Surveillance records.


Purpose	Data Subject	Types of data	Details of processing
Providing services Marketing activities Sales activities	Clients Potential Clients	Name, group affiliation, company, department, position, workplace, address, telephone number, email address, opinions, service requests, and correspondence	Offering services, receiving applications for providing services, responding to email, telephone, postal, or other inquiries. Conducting follow-up or survey work after services have been provided. Analysis to improve or add convenience to services, etc.
Suppliers Vendor Management	Vendors Suppliers	Name, group affiliation, company, department, position, workplace, address, telephone number, email address, opinions, service requests, and correspondence	Processing payments, VAT calculations, attending to queries, inventory control, reconciliations, accounting, vendor, or supplier performance evaluations, etc.

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Employment Management	Employees	Any of employees, the family of employees' personal information to the extent necessary for the employer to manage employment following the provisions of the applicable laws	Maintaining personal contact details, to comply with applicable legislation, payroll, and remuneration, implementing health management systems, performance evaluation, training, development planning, occupational health and safety, security and access control, implementation of medical aid schemes and retirement funding, administration of benefits, to ensure employees proceed on sick leave and maternity leave when necessary, to protect employees' beliefs and culture, employment and credit references, succession and contingency planning, etc.
Recruitment	Potential Employees	Personal information provided in the recruitment form includes gender data, phone number, data of the person concerned, recruitment data such as third-party references, and any other data contained in the CV, etc.	Personal information, references, credit record, criminal record, employment history,

**9. RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM PERSONAL INFORMATION HELD MAY BE SUPPLIED**

- a. Recipients or categories of recipients with whom personal information is shared:  
 We may share the personal information of our data subjects for any of the purposes outlined in Section 5(a) with the following:
- Our other UNICA Group Companies in South Africa and other countries.
  - Our authorised UNICA Group representatives.
  - Our business partners, and
  - Our service providers and agents perform services on our behalf.

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- b. We do not share the personal information of our data subjects with any third parties, except if:
- We are obliged to provide such information for legal or regulatory purposes.
  - We are required to do so for purposes of existing or future legal proceedings.
  - We are selling one or more of our businesses to someone to whom we may transfer our rights under any customer agreement we have with you.
  - We are involved in the prevention of fraud, loss, bribery, or corruption.
  - they perform services and process personal information on our behalf.
  - this is required to provide or manage any information and/or services to data subjects, or
  - needed to help us improve the quality of our services. We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them. We will only disclose personal information to government authorities if we are required to do so by law. Our employees, authorised UNICA Group representatives, our agencies, and our suppliers, are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

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## 10. TRANSBORDER FLOW OF PERSONAL INFORMATION


We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only following South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries. We will take steps to ensure that 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 the POPI Act. We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in another section of this Manual.

## 11. INFORMATION SECURITY MEASURES IMPLEMENTED TO ENSURE CONFIDENTIALITY, INTEGRITY, AND AVAILABILITY OF INFORMATION

Information security measures to protect personal information:

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by UNICA and its operators. In terms of the POPI Act, operators are third parties that process personal information on behalf of UNICA. We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss, or destruction. We will take steps to ensure that operators that process personal information on behalf of UNICA apply adequate safeguards as outlined above.

When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual and the UNICA Privacy Policy, and do not have any objection to our processing their information following this policy.

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## **12. AVAILABILITY OF THE PAIA MANUAL**

A copy of the Manual is available:

- 12.1.1. On request from our offices.
- 12.1.2. On our website at [www.unica.co.za](http://www.unica.co.za).
- 12.1.3. To the Information Regulator upon request.
- 12.1.4. A fee for a copy of the Manual, as contemplated in Annexure B of the Regulations, shall be paid per each A4-size photocopy made.

## **13. UPDATING OF THE PAIA MANUAL**

This manual will be updated regularly and when applicable legislation is amended.