

PAIA MANUAL

Prepared in terms of section 51 of the
Promotion of Access to Information
Act 2 of 2000 (as amended)

DATE OF COMPILATION 26 MARCH 2024

TABLE OF CONTENTS

| | | |
|--------------|---|------------------|
| 1. | <u>INTRODUCTION</u> | <u>3</u> |
| 2. | <u>COMPANY OVERVIEW.....</u> | <u>3</u> |
| 3. | <u>CONTACT DETAILS FOR ACCESS TO INFORMATION OF ICOMBINE</u> | <u>3</u> |
| 3.1. | CHIEF INFORMATION OFFICER..... | 3 |
| 3.2. | THE INFORMATION OFFICER (SECTION 51(1)(B) | 4 |
| 3.3. | ACCESS TO INFORMATION GENERAL CONTACTS | 4 |
| 4. | <u>GUIDE OF MANUALS IN THE REPUBLIC OF SOUTH AFRICA IN TERMS OF SECTION 10.....</u> | <u>4</u> |
| 5. | <u>THE LATEST NOTICE IN TERMS OF SECTION 52(2)</u> | <u>4</u> |
| 6. | <u>RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION (SECTION 52(1)(D))</u> | <u>5</u> |
| 7. | <u>DESCRIPTION OF SUBJECTS ON WHICH RECORDS AND CATEGORIES OF RECORDS ARE HELD IN TERMS OF SECTION 51(1)(E).....</u> | <u>6</u> |
| 8. | <u>THIRD-PARTY DISCLOSURE.....</u> | <u>8</u> |
| 9. | <u>CROSS-BORDER TRANSFERS.....</u> | <u>8</u> |
| 10. | <u>TURN AROUND TIMES FOR ATTENDING REQUESTS.....</u> | <u>8</u> |
| 11. | <u>APPLICABLE FEES (SECTION 51(1)(F).....</u> | <u>9</u> |
| 11.1. | REQUEST FEE | 9 |
| 11.2. | ACCESS FEE | 9 |
| 11.3. | PAYMENT OF FEES | 10 |
| 12. | <u>AVAILABILITY OF THE MANUAL.....</u> | <u>10</u> |
| 13. | <u>UPDATING THE MANUAL</u> | <u>10</u> |
| 14. | <u>APPROVAL OF THE PAIA MANUAL</u> | <u>10</u> |

1. INTRODUCTION

1. iCombine (Pty) Ltd (“iCombine”) Promotion of Access to Information Manual (“Manual”) is published in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (“PAIA”) and section 23 - 25 of the Protection of Personal Information Act No.4 of 2014 (“POPIA”). This PAIA Manual provides an outline of the type of records it holds and explains how to submit requests for access to these records in terms of PAIA.
2. PAIA gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information. This is information held by the State but also information held by any other person. A person that is entitled to exercise a right or who needs information for the protection of any right is entitled to access that information, subject to certain restrictions.
3. Section 51 of PAIA creates a legal right to access records (as defined in section 1 of PAIA) of a private body (both natural and juristic), where a request is made in terms of the PAIA, the body to whom the request is made is obliged to release the information, subject to applicable legislative and/or regulatory requirements, except where PAIA expressly provides that the information may or must not be released.
4. iCombine is dedicated to implementing a PAIA Policy. We are committed to ensuring that information under our control is readily available and accessible, in line with the fundamental right of access to information and applicable constitutional principles. Our aim is to give effect to the letter and spirit of these principles in a positive and proactive manner.

2. COMPANY OVERVIEW

iCombine provides professional services and EMVL3 testing and certification services and is regarded as a private body in terms of PAIA.

3. CONTACT DETAILS FOR ACCESS TO INFORMATION OF ICOMBINE

3.1. CHIEF INFORMATION OFFICER

| | |
|----------------|--|
| Name | Robert Dennis Noel |
| Address | 84 7th street, Parkhurst, Johannesburg, Gauteng, 2193 |
| Postal Address | 84 7th street, Parkhurst, Johannesburg, Gauteng, 2193 |
| Contact Number | 083 445 0066 |
| Email address | info@icombine.co.za |
| Website | www.icombine.co.za |

3.2. THE INFORMATION OFFICER (SECTION 51(1)(B))

The Information Officer is responsible to, inter alia, assess requests for access to information. The Head of private body fulfils such function in terms of Section 51 of the Act. iCombine has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act. The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013 ("POPI Act").

The Information Officer oversees the functions and responsibilities as required in terms of both this Act as well as the duties and responsibilities in terms of Section 55 of the POPI Act after registering with the Information Regulator.

The Information Officer may appoint, where deemed necessary, Deputy Information Officers, as allowed in terms of Section 17 of the Act as well as Section 56 of the POPI Act. All requests for information in terms of the Act must be addressed to the Information Officer

3.3. ACCESS TO INFORMATION GENERAL CONTACTS

| | |
|---------------|------------------------|
| Email Address | info@icomcombine.co.za |
| Website | www.icomcombine.co.za |

4. GUIDE OF MANUALS IN THE REPUBLIC OF SOUTH AFRICA IN TERMS OF SECTION 10

The South African Human Rights Commission (as provided for in section 10 of PAIA) has published a "Guide on How to Use the Promotion of Access to Information Act 2 of 2000". This Guide assists persons in using and understanding PAIA. The Guide can be accessed via the South African Human Rights website (www.sahrc.org.za).

5. THE LATEST NOTICE IN TERMS OF SECTION 52(2)

At the time of publication of this PAIA Manual no notice has been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION (SECTION 52(1)(D))

Where applicable to its operations, iCombine also retains records and documents in terms of the legislation listed below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the relevant Act.

A request to access information must be done in accordance with the prescriptions of the Act.

| No. | Act |
|-----|--|
| 1 | Basic Conditions of Employment Act No. 75 of 1997 |
| 2 | Companies Act no. 71 of 2008 |
| 3 | Compensation of Occupational Injuries and Diseases Act No. 130 of 1993 |
| 4 | Competition Act No.98 of 1978 |
| 5 | Constitution of the Republic of South Africa 2008 |
| 6 | Consumer Protection Act No. 68 of 2008 |
| 7 | Electronic Communications Act No.36 of 2005 |
| 8 | Employment Equity Act No. 55 of 1998 |
| 9 | Income Tax Act No. 58 of 1962 |
| 10 | Labour Relations Act no.66 of 1995 |
| 11 | Occupational Health and Safety Act No.85 of 1993 |
| 12 | Promotion of Access to Information Act No. 2 of 2000 |
| 13 | Protection of Personal Information Act No. 4 of 2013 |
| 14 | Skills Development Act No. 97 of 1998 |
| 15 | Unemployment Contributions Act 63 of 2001 |
| 16 | Unemployment Insurance Act No. 30 of 1996 |
| 17 | Value Added Tax Act 89 of 1991 |

7. DESCRIPTION OF SUBJECTS ON WHICH RECORDS AND CATEGORIES OF RECORDS ARE HELD IN TERMS OF SECTION 51(1)(E)

iCombine holds and maintains record on the following categories of information. Please note that by recording a category or subject matter below in this Manual does not constitute that a request for access to any records would be honoured. All requests for access will be evaluated on a “case by case” basis in accordance with the provisions of the Act.

| | |
|------------------------|---|
| <p>Company Records</p> | <ul style="list-style-type: none"> • Memorandum of Incorporation * (automatically available from CIPC) • Directors' Names *(automatically available from CIPC) • Memorandum and Articles of Association* (automatically available from CIPC) • Company Register • Shareholders Agreements • Share Certificates • Board Meetings: Attendance Register <ul style="list-style-type: none"> ○ Resolutions ○ Minute Books • Delegation of Authorities • Legal Compliance Records <ul style="list-style-type: none"> ○ Policies • General Correspondence • Other Statutory Information |
| <p>Finance Records</p> | <ul style="list-style-type: none"> • Financial Statements • Corporate Tax Records <ul style="list-style-type: none"> ○ Other documents related to the taxation of the company ○ Tax Returns • Accounting Records <ul style="list-style-type: none"> ○ Journals, Ledgers and Balance Sheets ○ Income Statements ○ Trial Balance Statements ○ Cash Flow Statements • Banking Records <ul style="list-style-type: none"> ○ Banking Statements • Asset Register • Invoices <ul style="list-style-type: none"> ○ Debtors and Creditors ○ Credit/Debit Notes • Detail of Auditors <ul style="list-style-type: none"> ○ Auditors' Reports • Rental Agreements • General Correspondence |

| | |
|--------------------------------|--|
| Human Resource Records | <ul style="list-style-type: none"> • Employee's Personal Information <ul style="list-style-type: none"> ○ Employee Contracts ○ Remuneration Information ○ Employees' Travel Records ○ Leave Records ○ Disciplinary and Grievance Records ○ Performance Evaluations ○ Job Profiles ○ Remuneration • Human Resource Policies and Procedures • General correspondence |
| Client Records | <ul style="list-style-type: none"> • Contact Details of Individuals Representing a Corporate Client • Communications with Clients • Debt and Debtor Information <ul style="list-style-type: none"> ○ Transactional Information • General Correspondence |
| Marketing Records | <ul style="list-style-type: none"> • New product Development Information • Advertising • Vendor Information <ul style="list-style-type: none"> ○ Reseller Information ○ End User Information • General Correspondence |
| Operational Records | <ul style="list-style-type: none"> • Client contact information • Client Assignments • Client Reports • Proof of delivery of Service |
| Information Technology Records | <ul style="list-style-type: none"> • Hardware Records • Operating Systems • Software Packages and Cloud Subscriptions • Internal Systems Support and Programming / Development • Capacity and Utilisation of Current Systems <ul style="list-style-type: none"> ○ Agreements ○ Licenses Agreements • Review Records • General Correspondence |
| Legal and regulatory Reports | <ul style="list-style-type: none"> • Contracts/Agreements • Customer Agreements • Non-Disclosure Agreements • Supplier/service Provider Contracts • Independent Contractors/Agent Agreements • Annual Report and License Fees • General Correspondence |

8. THIRD-PARTY DISCLOSURE

In the course of its business, iCombine may need to share the personal information of its clients with third parties, such as contractors, service providers, software developers, agents, and licensed electronic communications operators (who are also responsible parties under relevant legislation). However, iCombine will only share personal information with third parties when it is necessary to maintain the quality of its products and services for its customers. Furthermore, iCombine will ensure that such third parties are contractually obligated to implement and manage appropriate safeguards to lawfully process and protect personal information.

9. CROSS-BORDER TRANSFERS

If a situation arises where it becomes necessary or unavoidable to transfer personal information across borders, iCombine will ensure that the data protection and privacy laws of the countries where the information is being transferred to are similar to those of the Republic of South Africa. Additionally, iCombine will ensure that the recipients of the personal information commit to the same standards and requirements of data protection as iCombine has committed to.

10. TURN AROUND TIMES FOR ATTENDING REQUESTS

Upon receiving a request, iCombine will make a decision on whether to grant or decline it within 30 working days. If the request is for various documents or information, or if a search is required to obtain the requested information and it cannot be obtained within the original 30-day period, iCombine may extend the decision period for an additional 30 working days. If an extension is required, the requester will be notified. In either case, iCombine will provide a notice with reasons (if applicable) for the decision.

11. APPLICABLE FEES (SECTION 51(1)(F))

There are two basic types of fees applicable in terms of PAIA – “request” and “access” fees.

11.1. REQUEST FEE

The request fee is an administration fee that is payable on submission of the request for access to a record and must be paid before the request is considered (unless the request is to access the requester’s personal information in which event there is no applicable fee). The request fee is not refundable if the request for access has been granted however it is refundable if the request for access has been denied by iCombine.

The request fee is currently statutorily set at R50-00 (fifty rand) for a private body and is subject to change as announced in terms of PAIA.

In line with section 23(1)(a) of POPIA, a Data Subject (i.e. personal requester) has a right to request iCombine to confirm, free of charge, whether or not personal information about the Data Subject is held.

11.2. ACCESS FEE

The access fee is payable, prior to the Requester gaining access to the records in the required form.

The access fee is intended to reimburse iCombine for any costs involved in the reproduction, search and preparation of the records requested and for any reasonable time required, (more than the prescribed hours) to search and prepare the records.

Should the preparation of the required record(s) take more than 6 (six) hours, a deposit (of 1/3 (one third)) of the access fee is payable before the request will be processed as a deposit. iCombine may withhold a record until the requester has paid the applicable fees (if any).

In accordance with Section 23(3) of POPIA, iCombine may charge an access fee to the data subject to enable iCombine to respond to the request. In such instances iCombine must provide the data subject with a written estimate of the fee before offering the services. The fee structure is available on the website of the South Africa Human Rights Commission at www.sahrc.org.za.

11.3. PAYMENT OF FEES

The initial request fee should be deposited into the bank account below. Please submit a copy of the deposit slip, and the request to the Information Officer via email.

All fees must be deposited into the following bank account.

| | |
|----------------|--------------------|
| Bank | FNB |
| Name | iCombine (Pty) Ltd |
| Account Number | 62719557152 |
| Branch Code | 251655 |
| Reference | Requestors Name |

All fees are subject to change as allowed for in the Act and consequently, such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any changes in the fees prior to making a payment.

12. AVAILABILITY OF THE MANUAL


The Manual is available on iCombine's website at www.icombine.co.za.

13. UPDATING THE MANUAL

The information officer of iCombine will on a regular basis or as required update this manual.

14. APPROVAL OF THE PAIA MANUAL

This PAIA Manual of iCombine is approved and signed by a Director and the Information Officer of iCombine, on this 26 day of March 2024

A handwritten signature in black ink, appearing to read "R. Dennis Noel", written over a horizontal line.

Approved by Robert Dennis Noel (Director)

26 March 2024

Date.