



PROMOTION OF ACCESS TO INFORMATION MANUAL

V1

3rd January 2025

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1. Introduction

This manual has been compiled in accordance with section 51 of the Promotion of Access to Information Act, 2000 ("PAIA"). This manual explains how requesters can submit requests for access to information to S-RM under PAIA.

2. The Business

S-RM is an international risk consultancy business that specialises in the provision of corporate intelligence and cyber security services.

Diana Komubaizi Nyabongo has been duly appointed as the Information Officer for S-RM and is the person to whom requests for access to information must be made pursuant to PAIA and the Protection of Personal Information Act 4 of 2013 ("POPIA").

3. Purpose of this PAIA Manual

This PAIA Manual is useful for the public to:

- be aware of the categories of records held by S-RM which can be made available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a request for access to a record of S-RM, by providing a description of the subjects on which S-RM holds records and the categories of records held on each subject;
- be aware of the records of S-RM which are available in accordance with any other legislation;
- access the contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- know if S-RM will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto. For more information on how we process personal information, please refer to our privacy policy available at (<https://www.s-rminform.com/privacy-policy/>).
- know the description of the categories of data subjects and of the information or categories of information relating thereto;
- know the recipients or categories of recipients to whom personal information may be supplied by S-RM;
- know if S-RM 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
- know whether S-RM has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. S-RM's contact details

Physical address: 21st Floor, Towers South, The Towers,
2 Heerengracht, Cnr Hertzog Boulevard, Foreshore,
Cape Town, 8001

Postal address: P O BOX 7267, Roggebaai,
Cape Town, Western Cape, 8012

Telephone number: +27 (0)21 137 6249

Email address: privacy@s-rminform.com

Website: <https://www.s-rminform.com>.

5. Information Officer and Deputy Information Officer details

| Details | Information Officer | Deputy Information Officer |
|------------------|---|---|
| Name | Diana Komubaizi Nyabongo | Matt Venturas |
| Postal Address | P O BOX 7267, Roggebaai, Cape Town, Western Cape, 8012 | P O BOX 7267, Roggebaai, Cape Town, Western Cape, 8012 |
| Physical Address | 21st Floor, Towers South, The Towers, 2 Heerengracht, Cnr Hertzog Boulevard, Foreshore, Cape Town, 8001 | 21st Floor, Towers South, The Towers, 2 Heerengracht, Cnr Hertzog Boulevard, Foreshore, Cape Town, 8001 |
| Telephone | +27 (0)21 137 6249 | +27 (0)21 137 6249 |
| Email | privacy@s-rminform.com | privacy@s-rminform.com |

6. The Section 10 Guide on how to use PAIA

The above guide, as drafted by the South African Human Rights Commission and updated by the Information Regulator, is available at the offices of the Information Regulator and on its website as prescribed by Section 10 of PAIA and in accordance with POPIA. Please direct any queries regarding this guide to:

Information Regulator:

Address: JD House
27 Stiemens Street, Braamfontein, Johannesburg, 2001
P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone Number: 010 023 5200

| | |
|----------------------------|--|
| Telefax Number: | N/A |
| Website: | https://info regulator.org.za/ |
| email (complaints): | PAIAComplaints@info regulator.org.za |
| email (general enquiries): | enquiries@info regulator.org.za |

7. Records that are available without having to request access

S-RM does not make available to requesters any records that are automatically available and no notice has been published in terms of section 52(2) of PAIA regarding the categories of S-RM's records which are automatically available to requesters without having to request access to such information.

8. Records that are available in terms of other legislation

A requester may request information which is available pursuant to the following legislation, provided that the requester complies with the requirements set out in such legislation, this manual and PAIA:

- Basic Conditions of Employment Act, 1997;
- Companies Act, 2008;
- Compensation for Occupational Injuries and Diseases Act, 1993;
- Electronic Communications and Transactions Act 2 of 2000
- Employment Equity Act, 1998;
- Income Tax Act, 1962;
- Labour Relations Act, 1995;
- Occupational Health and Safety Act, 1993;
- Promotion of Access to Information Act, 2000;
- Protection of Personal Information Act, 2013;
- Skills Development Levies Act, 1999;
- Unemployment Insurance Act, 2001; and
- Value Added Tax Act, 1991.

Please note that the legislation listed above is not an exhaustive list of legislation in respect of which S-RM holds records.

9. Subjects and categories of information held by S-RM

The subjects and categories of records held by S-RM are as follows:

| Subject | Category |
|---------------------------------------|---|
| Company records | Constitutional documents (including incorporation documents, the memorandum of incorporation and the shareholders agreement) Share registers, share certificates, registers and details concerning shareholder meetings and resolutions Details concerning the identity of directors, directors' meetings, director resolutions Statutory registers and minute books |
| Financial records | Bank records Financial statements Management accounts Audit reports Tax records |
| Strategic and operational information | Minutes of management meetings Minutes of board meetings Annual reports |
| Assets | Asset register Share certificates Debtors information Bank account reconciliation |
| Liabilities | General ledger |
| Information technology | Asset register Software licences IT policies and procedures |

| | |
|---------------------------|--|
| Compliance | General policies and procedures – compliance tasks with reporting |
| Human resources | <p>Staff records</p> <p>Contracts of employment</p> <p>Statutory records</p> <p>Training and skills development records</p> <p>Employment equity records</p> <p>Leave records</p> <p>Beneficiary records</p> <p>HR policies and procedures</p> <p>Disciplinary procedures</p> <p>Salary information</p> <p>Pension fund information</p> <p>Medical aid information</p> |
| Contractual relationships | <p>Leases</p> <p>Contracts with customers</p> <p>Contracts with vendors</p> |
| Customer Information | <p>Customer details</p> <p>Communications with customers</p> <p>Sales contracts</p> <p>Transactional information</p> |
| Marketing | <p>Brand Information</p> <p>Strategies</p> <p>Agreements</p> <p>Client relationship programmes</p> <p>Marketing publications and brochures</p> |

10. Description of personal information processing in terms of POPIA

S-RM processes personal information as follows:

| Subject | Category |
|--|--|
| Purpose of the processing | <p>Sale of products and services</p> <p>To verify identity</p> <p>To process applications to subscribe to our services</p> <p>To market products and services to customers</p> <p>To comply with statutory obligations</p> <p>To conduct market research surveys</p> <p>To conduct credit checks</p> <p>Security, administrative and legal purposes</p> <p>To fulfil contractual obligations that we have with customers or third parties</p> <p>To provide services to clients</p> |
| Data subject categories and their personal information | <p>Employees: records of employee life cycle</p> <p>General public: general enquiries and viewing the company website</p> <p>Industry bodies: membership records</p> <p>Media: records of media interactions</p> <p>Service providers: record of service provider life cycle</p> <p>Clients: records of life cycle</p> <p>Third Parties: subjects of client engagements; including but not limited to actual and prospective employees, agents, subcontractors, vendors, business partners of clients and directors and employees of acquisition and investment targets.</p> |
| Recipients of personal information | <p>Employee pension funds</p> <p>S-RM affiliates Financial institutions</p> <p>Industry bodies</p> <p>Law enforcement</p> |

| | |
|---|--|
| | <p>Medical aid schemes</p> <p>Operators (service providers)</p> <p>Statutory authorities</p> <p>Clients</p> |
| Expected transnational transfer of personal information | <p>Transfer of personal information to operators</p> <p>Transfer of personal information to other members in the group</p> <p>Transfer of personal information through social media platforms</p> <p>Transfer of personal information to clients (only where S-RM South Africa is the contracting party to the Letter of Engagement)</p> |
| Security measures to protect personal information | <p>Physical security measures</p> <ul style="list-style-type: none"> • Access control measures • Internal security measures <p>Cyber security measures</p> <ul style="list-style-type: none"> • Anti-spam measures • Anti-virus measures • Installing security firewalls • Password control <p>Training programs on information security</p> <p>Information security audits</p> <p>IT-related company policies</p> |

For more information on how we process personal information, please refer to our privacy policy available at (<https://www.s-rminform.com/privacy-policy/>).

11. The request procedure

11.1 Prescribed form

- A request for information must be made in the prescribed form, a copy of which is attached as Annexe A, must be addressed to the Information Officer and must be submitted with the prescribed fee (see paragraph 11.3).
- The prescribed request form is available from the Information Officer and from the Information Regulator, whose contact details are set out in paragraph 6 above.

11.2 Manner of request

- The request must be made to the addressor email address of the company set out in paragraph 5 above.
- The requester must provide enough detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form (mode/method) of access is required. The requester should indicate if it requires notice of the decision of the Information Officer in any manner, other than in writing.
- The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

11.3 Fees

- A requester who seeks access to a record containing personal information must pay the required request fee.
- The Information Officer must by notice, require the requester to pay the prescribed fee, if any, before further processing the request.
- The requester may lodge an application to the high court relating to the payment of the request fee.
- After the Information Officer has decided on the request, the requester must be notified in the required form.
- If the request is granted, a further access fee must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.
- The prescribed fees are available from the Information Officer or the Information Regulator, whose contact details are set out in paragraph 5 above. The form reflecting the current fees applicable is attached as 0.

12. Availability of this manual

This manual is available for inspection at:

- S-RM's website <https://www.s-rminform.com>.
- S-RM's principal place of business set out in paragraph 5 above, during normal business hours; and

- the Information Regulator (see contacts details in paragraph 0 above).

Request for access to record

[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

| PERSONAL INFORMATION | |
|--|--|
| Full Names | |
| Identity Number | |
| Capacity in which request is made <i>(when made on behalf of another person)</i> | |
| Postal Address | |
| Street Address | |

| | | | |
|---|-----------|--|------------|
| E-mail Address | | | |
| Contact Numbers | Tel. (B): | | Facsimile: |
| | Cellular: | | |
| Full names of person on whose behalf request is made <i>(if applicable)</i> : | | | |
| Identity Number | | | |
| Postal Address | | | |
| Street Address | | | |
| E-mail Address | | | |
| Contact Numbers | Tel. (B) | | Facsimile |
| | Cellular | | |
| PARTICULARS OF RECORD REQUESTED | | | |
| <p><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></p> | | | |
| Description of record or relevant part of the record: | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Reference number, if available | | | |
| | | | |

| | |
|-----------------------------------|--|
| Any further particulars of record | |
| | |
| | |
| | |

TYPE OF RECORD
(Mark the applicable box with an "X")

| | |
|--|--|
| Record is in written or printed form | |
| Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i> | |
| Record consists of recorded words or information which can be reproduced in sound | |
| Record is held on a computer or in an electronic, or machine-readable form | |

FORM OF ACCESS
(Mark the applicable box with an "X")

| | |
|--|--|
| Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i> | |
| Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i> | |
| Transcription of soundtrack <i>(written or printed document)</i> | |
| Copy of record on flash drive <i>(including virtual images and soundtracks)</i> | |
| Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i> | |
| Copy of record saved on cloud storage server | |

MANNER OF ACCESS

(Mark the applicable box with an "X")

| | |
|---|--|
| Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i> | |
| Postal services to postal address | |
| Postal services to street address | |
| Courier service to street address | |
| Facsimile of information in written or printed format <i>(including transcriptions)</i> | |
| E-mail of information <i>(including soundtracks if possible)</i> | |
| Cloud share/file transfer | |
| Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i> | |

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

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.

| | |
|--|--|
| Indicate which right is to be exercised or protected | |
| | |
| | |

| | |
|--|--|
| Explain why the record requested is required for the exercise or protection of the | |
| | |

| | |
|-----------------------|--|
| aforementioned right: | |
|-----------------------|--|

| FEES | |
|--------|--|
| a) | <i>A request fee must be paid before the request will be considered.</i> |
| b) | <i>You will be notified of the amount of the access fee to be paid.</i> |
| c) | <i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i> |
| d) | <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i> |
| Reason | |
| | |
| | |

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

| Postal address | Facsimile | Electronic communication <i>(Please specify)</i> |
|----------------|-----------|---|
| | | |

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

| | |
|-------------------|--|
| Reference number: | |
|-------------------|--|

| | |
|---|--|
| <i>Request received by:</i> <i>(State Rank, Name And Surname of Information Officer)</i> | |
| <i>Date received:</i> | |
| <i>Access fees:</i> | |
| <i>Deposit (if any):</i> | |

Signature of Information Officer

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

1. *If your request is granted the —*
 - *amount of the deposit, (if any), is payable before your request is processed; and*
 - *requested record/portion of the record will only be released once proof of full payment is received.*
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____

Your request dated _____, refers.

e) You requested:

| | |
|---|--|
| Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B. | |
|---|--|

OR

f) You requested:

| | |
|---|--|
| Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>) | |
| Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>) | |
| Transcription of soundtrack (<i>written or printed document</i>) | |
| Copy of information on flash drive (<i>including virtual images and soundtracks</i>) | |
| Copy of information on compact disc drive(<i>including virtual images and soundtracks</i>) | |

| | |
|--|--|
| Copy of record saved on cloud storage server | |
|--|--|

g) To be submitted:

| | |
|---|--|
| Postal services to postal address | |
| Postal services to street address | |
| Courier service to street address | |
| Facsimile of information in written or printed format <i>(including transcriptions)</i> | |
| E-mail of information <i>(including soundtracks if possible)</i> | |
| Cloud share/file transfer | |
| Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i> | |

Kindly note that your request has been:

Approved

Denied, for the following reasons:

h) Fees payable with regards to your request:

| Item | Cost per A4-size page or part thereof/item | Number of pages/items | Total |
|---|--|-----------------------|-------|
| Photocopy | | | |
| Printed copy | | | |
| For a copy in a computer-readable form on: | | | |
| (i) Flash drive | R40.00 | | |
| • To be provided by requestor | R40.00 | | |
| (ii) Compact disc | R60.00 | | |
| • If provided by requestor | | | |
| • If provided to the requestor | | | |
| For a transcription of visual images per A4-size page | Service to be outsourced. Will depend on the quotation of the service provider | | |
| Copy of visual images | | | |
| Transcription of an audio record, per A4-size | R24.00 | | |
| Copy of an audio record | | | |
| (i) Flash drive | R40.00 | | |
| • To be provided by requestor | | | |
| (ii) Compact disc | R40.00 | | |
| • If provided by requestor | | | |
| • If provided to the requestor | R60.00 | | |
| Postage, e-mail or any other electronic transfer: | Actual costs | | |
| TOTAL: | | | |

i) **Deposit payable (if search exceeds six hours):**

Yes

No

| | | | |
|-----------------|--|---|--|
| Hours of search | | Amount of deposit <i>(calculated on one third of total amount per request)</i> | |
|-----------------|--|---|--|

The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____

Information officer



S-RM is a global intelligence and cyber security consultancy

Founded in 2005, we have 350+ practitioners spanning eight international offices, serving world class organisations across all regions and major sectors.

hello@s-rminform.com | www.s-rminform.com