

# PAIA MANUAL

PREPARE IN TERMS OF SECTION 50 OF THE PROMOTION OF  
ACCESS TO INFORMATION ACT, 2000 (ACT NO. 2 OF 2000)



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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	<b>“CEO”</b>	Chief Executive Officer
1.2	<b>“DIO”</b>	Deputy Information Officer;
1.3	<b>“IO”</b>	Information Officer;
1.4	<b>“Minister”</b>	Minister of Justice and Correctional Services;
1.5	<b>“PAIA”</b>	Promotion of Access to Information Act No. 2 of 2000 (as Amended;
1.6	<b>“POPIA”</b>	Protection of Personal Information Act No.4 of 2013;
1.7	<b>“Regulator”</b>	I Information Regulator; and
1.8	<b>“Republic”</b>	Republic of South Africa

## 2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 2.1 Check the categories of records held by Globescope Security (Pty) Ltd, which are available without a person having to submit a formal PAIA request;
- 2.2 Have an understanding of how to make a request for access to a record of Globescope Security (Pty) Ltd, by providing a description of the subjects on which Globescope Security (Pty) Ltd holds records and the categories of records held on each subject;
- 2.3 Know the description of the records of Globescope Security (Pty) Ltd which are available in accordance with any other legislation;
- 2.4 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;
- 2.5 Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it;
- 2.6 Inform the public as to the 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;
- 2.7 Know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 Know the recipients or categories of recipients to whom the personal information may be supplied;

- 2.9 Know if Globescope Security (Pty) Ltd 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
- 2.10 Know whether Globescope Security (Pty) Ltd appropriate security measures have to ensure the confidentiality, integrity, and availability of the personal information that is to be processed.

### **3. CONTACT DETAILS FOR ACCESS TO INFORMATION OF GLOBESCOPE SECURITY (PTY) LTD**

#### **3.1. Information Officer**

Name: Glynn Mashonga  
Tel: +27 82 479 7323  
Email: [glynn@globescope.co.za](mailto:glynn@globescope.co.za)

- 3.2. Deputy Information Officer (NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.)

Name: Angelique Connoway  
Tel: +27 75 287 9346  
Email: [angelique@globescope.co.za](mailto:angelique@globescope.co.za)

#### **3.3 Access to information on general contacts**

Email: [angelique@globescope.co.za](mailto:angelique@globescope.co.za)

#### **3.4 National or Head Office**

Postal Address: 7530 Cape Town

Physical Address: Edward Road, Tygervally, Cape Town

Telephone: +27 75 287 9346

Email: [angelique@globescope.co.za](mailto:angelique@globescope.co.za)

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

## **4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE**

- 4.1. 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.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The aforesaid Guide contains the description of-

- 4.3.1 The objects of PAIA and POPIA;
- 4.3.2 The postal and street address, phone and fax number, and, if available, electronic mail address of-
  - 4.3.2.1 The Information Officer of every public body, and
  - 4.3.2.2 Every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
- 4.3.3 The manner and form of a request for:
  - 4.3.3.1 Access to a record of a public body contemplated in section 11<sup>3</sup>; and
  - 4.3.3.2 Access to a record of a private body contemplated in section 50<sup>4</sup>;
- 4.3.4 The assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
- 4.3.5 The assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6 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-
  - 4.3.6.1 An internal appeal;
  - 4.3.6.2 A complaint to the Regulator; and
  - 4.3.6.3 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;
- 4.3.7 The provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

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<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 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.*

<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.*

- 4.3.8 The provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively
- 4.3.9 The notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10 The regulations made in terms of section 92<sup>11</sup>.
- 4.4 Members of the public can inspect or make copies of the Guide from the offices of Globescope Security (Pty) Ltd, including the office of the Regulator, during normal working hours.
- 4.5 The Guide can also be obtained:
- 4.5.1 Upon request to the Information Officer;
- 4.5.2 From the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

## 5. CATEGORIES OF RECORDS HELD BY GLOBESCOPE SECURITY (PTY) LTD

### Records that are automatically available

- 5.1.1 The categories of records of Globescope Security (Pty) Ltd that are automatically available without a person having to request access in terms of the PAIA Act, including categories available for:
- Inspection in terms of legislation other than this Act;
  - Purchase or copying from the private body; and
  - From the private body free of charge.
- 5.1.2 The records that are located on the Globescope Security (Pty) Ltd website, however, are automatically available and are freely accessible to any person requesting this information. It is therefore not necessary to apply for access thereto in terms of PAIA. Globescope Security (Pty) Ltd the website address is [www.globescope.co.za](http://www.globescope.co.za)

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<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.”

## 6. RECORDS HELD BY GLOBESCOPE IN ACCORDANCE WITH LEGISLATION

6.1 Globescope Security (Pty) Ltd is required in accordance with legislation to retain certain records. We hold records for the purposes of PAIA in accordance with the following legislation, among others:

- 6.2.1 Basic Conditions of Employment Act 75 of 1997
- 6.2.2 Broad Based Black Economic Empowerment Act 53 of 2003
- 6.2.3 Companies Act 71 of 2008
- 6.2.4 Compensation for Occupational Injuries and Diseases Act 130 of 1993
  
- 6.2.5 Employment Equity Act 55 of 1998
- 6.2.6 Labour Relations Act 66 of 1995
- 6.2.7 Skills Development Levies Act 9 of 1999
- 6.2.8 Unemployment Insurance Act 63 of 2001
- 6.2.9 Private Security Industry Regulatory Authority
- 6.2.10 National Bargaining Council for the Security Sector

## 7. DESCRIPTION OF THE SUBJECTS ON WHICH GLOBESCOPE SECURITY (PTY) LTD HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

The table below contains a description of the types of records/subjects on which Globescope Security (Pty) Ltd holds and the categories of records held on each subject. These records are not automatically available without a request in terms of PAIA. A request made in terms of PAIA for records in any category below may be refused in accordance with any of the grounds of refusal as set out in PAIA.

SUBJECT ON WHICH THE BODY HOLD RECORD	CATEGORIES OF RECORDS
Statutory records	<ul style="list-style-type: none"><li>- Globescope Security (Pty) Ltd incorporation documents</li><li>- Memorandum of incorporation</li><li>- Minutes of meeting with directors</li><li>- Records relating to the appointment of directors, auditors and other officers.</li></ul>
Income Tax	<ul style="list-style-type: none"><li>- PAYE records</li><li>- Documents for income tax purposes</li><li>- Records of payment made to SARS on behalf of employees.</li><li>- All or any other statutory compliance</li><li>- Unemployment insurance fund</li><li>- Skills development Fund</li></ul>
Labour Relations Act	<ul style="list-style-type: none"><li>- Personnel documents and record</li><li>- Employment contracts</li><li>- Medical aid records</li><li>- Pension fund records</li><li>- Disciplinary record</li><li>- Salary records</li><li>- Disciplinary code and/or procedures</li><li>- Leave records</li><li>- Training records</li></ul>

	<ul style="list-style-type: none"> <li>- Training manuals</li> <li>- Address lists</li> </ul>
Financial records	<ul style="list-style-type: none"> <li>- Receipts and payments</li> <li>- Bank statements</li> <li>- A list of the Globescope Security (Pty) Ltd debtors and creditors</li> <li>- Budget</li> <li>- Management accounts</li> <li>- Invoices</li> <li>- Salaries</li> <li>- Minutes of meetings</li> <li>- Correspondence</li> </ul>
Risk and compliance	<ul style="list-style-type: none"> <li>- Contracts</li> <li>- Policies and procedures</li> <li>- Risk assessment compliance records</li> </ul>
Other information	<ul style="list-style-type: none"> <li>- IT usage and equipment details</li> <li>- Supplier lists</li> <li>- Secretarial lists</li> <li>- Media releases and public relations event records.</li> </ul>

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

8.1.1 Chapter 3 of POPIA provides for the minimum conditions for lawful processing of personal information. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

8.1.2 Globescope Security (Pty) Ltd processes personal information in accordance with POPIA. In terms of our privacy policy, Globescope Security (Pty) Ltd will ensure that all processing conditions of POPIA are complied with at the time of personal information. Globescope Security (Pty) Ltd processes personal information of both living and juristic persons.

8.1.3 Globescope Security (Pty) Ltd will process your information in the ordinary course of the business and provide Security and related services to their clients.

8.1.4 Globescope Security (Pty) Ltd processes personal information for a number of reasons, including:

- 8.1.4.1 Providing services requested by clients
- 8.1.4.2 Managing the relationship with clients
- 8.1.4.3 Managing dispute resolutions (Bargaining Council)
- 8.1.4.4 Creating and managing supplier relationships
- 8.1.4.5 Managing contracts, orders and invoices
- 8.1.4.6 General Human Resource Management
- 8.1.4.7 Recruitment and selection
- 8.1.4.8 For safety and security reasons in respect of CCTV footage from cameras installed at the premises of Globescope Security (Pty) Ltd.



## 8.2 Categories of data subjects and types of personal information processes

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	Names, registration number, vat numbers, address, trade secrets and bank details
Employees	Address, qualifications, gender and race

## 8.3 The recipients or categories of recipients to whom the personal information may be supplied

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

- 8.3.1 Globescope Security (Pty) Ltd may disclose your personal information to third parties such as our associates and service providers for legitimate business

purposes in accordance with applicable law and subject to the applicable professional and regulatory requirements regarding confidentiality.

- 8.3.2 Should Globescope Security (Pty) Ltd disclose your personal information to third parties, the latter will be obliged to use that personal information for the reasons and purposes the information was disclosed. To this end, we have agreements in place with the relevant third parties to ensure that an adequate level of security and confidentiality is adopted by the third parties.

- 8.3.3 Globescope Security (Pty) Ltd may be obliged to disclose your personal information where we have a duty to disclose in terms of law or where we believe that it is necessary to protect our rights. This includes where we are required to disclose your personal information as a result of litigation being instituted by or against us.

## 8.4 Planned transborder flows of personal information

- 8.4.1 Globescope Security (Pty) Ltd has no planned transborder flows of personal information.

## 8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

- 8.5.1 Globescope Security (Pty) Ltd takes reasonable, appropriate and adequate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction, damage, alteration, disclosure or unauthorised access.

- 8.5.2 Globescope Security (Pty) Ltd contractually mandate any third parties to which your personal information is transferred to do the same.
- 8.5.3 Globescope Security (Pty) Ltd regularly reviews our security controls and related processes to ensure that your personal information is secure. However, where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify the Regulator and you, unless the Regulator or a public body responsible for detection, prevention, or investigation of offences informs us that notifying you will impede a criminal investigation.

## 9. HOW TO REQUEST ACCESS TO A RECORD

- 9.1 To request a record in terms of PAIA, the party requesting must complete the prescribed form attached to this manual as **Annexure A**. The request must be sent to the Information Officer at [angelique@globescope.co.za](mailto:angelique@globescope.co.za) situated at 76 Edward Road, Tygervally, Cape Town.
- 9.2 For POPIA-related requests to object to the processing of personal information, correct or delete personal information, the request must be made in writing on prescribed **Form 1 (objection) or Form 2 (correction or deletion)**, which are attached to this manual as **Annexure B**.
- 9.3 The party requesting the information must provide sufficient detail to enable the Information Officer to identify the record (s) requested and the party requesting. The requester must indicate which form of access is required, identify the right that he/she is seeking to exercise or protect, and provide an explanation of why the requested record is required for the exercise of protection of that right.
- 9.4 If the request is made on behalf of another person, the party requesting the information must submit proof of the capacity in which the requester is making the request, to the reasonable satisfaction of the Information Officer.
- 9.5 PAIA makes provision for certain grounds upon which a request for access to information must be refused. The Information Officer will thus decide whether or not to grant a request for access to information.

## 10. PAYMENT OF FEES

- 10.1 PAIA provides two types of fees, namely:
- 10.1.1 A request fee, which will be a standard non-refundable administration fee payable prior to the request being considered; and
- 10.1.2 An access fee, payable when access is granted, which must be calculated by taking into account reproduction costs, search and preparation time, and costs as well as postal costs.
- 10.1.3 Subsequent to a request being made, the Information Officer shall, by notice, require the requester, excluding a personal requester, to pay the prescribed fee before further processing the request.
- 10.1.4 If the search for and preparation for disclosure of the record has been made, including arrangement to make it available in the request form, requires more than the hours prescribed in the regulations for the purpose, (Globescope Security (Pty) Ltd) will request the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted

- 10.1.5 Globescope Security (Pty) Ltd may withhold a record until the requester has paid the fees as indicated in **Annexure C**.
- 10.1.6 A requester whose request has been granted must pay the applicable access fee for reproduction, search, preparation and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.
- 10.1.7 In terms of POPIA, a data subject has the right to request Globescope Security (Pty) Ltd to confirm, free of charge, whether or it holds personal information about the data subject and request from Globescope Security (Pty) Ltd the record or a description of the personal information held, including
- 10.1.8 information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.
- 10.1.9 POPIA further provides that where the data subject is required to pay a fee for services provided to them, Globescope Security (Pty) Ltd must provide the data subject with a written estimate of the payable amount before providing the service and may require that the requestor pay a deposit for all or part of the fee.

## **11. EXTENSION OF PERIOD TO DEAL WITH REQUEST**

- 11.1 Globescope Security (Pty) Ltd will inform the requester within 30 days after receipt of the request of its decision whether or not to grant the request.
- 11.2 The 30-day period may be extended by a further period of not more than 30 days if:
  - 11.2.1 The request is for a large number of records or requires a search through a large number of records, and compliance with the original period would unreasonably interfere with the activities of Globescope Security (Pty) Ltd or the records are not located at Globescope Security (Pty) Ltd offices;
  - 11.2.2 The request requires a search through records in an office of that body not situated in the same city or town, and could thus not be completed within 30 days, and/or;
  - 11.2.3 The request requires a level of consultation in order to act on the request, which cannot be reasonably completed within just 30 days;
  - 11.2.4 If the requester consents in writing to such extension.
- 11.3 The Information Officer must notify the requested of his/her intention to extend the initial time period, and indicate the period of extension, the reason for the extension, and notify the requester of his/her rights to:
  - 11.3.1 Appeal to the relevant authority;
  - 11.3.2 Complain to the Regulator; or
  - 11.3.3 Launch proceedings in court against the extension as the case may be.

## **12. OUTCOME OF REQUEST: GRANTING OR REFUSING**

- 12.1 Should the request be refused, the notice will state adequate reasons for the refusal, including the provisions of the PAIA relied upon, and that the requester may lodge an application with a Court against the refusal of the request.
- 12.2 Section 70 of the PAIA Act stipulates that access should be granted for a request under Section 63 (1), 64 (1) 65, 66 (a) or (b), 67, 68 (1) or 69 (1) of (2) if the disclosure of the record would reveal evidence of:
- A substantial contravention of, or failure to comply with, the law; or
  - Imminent and serious public safety or environmental risk; and
  - The public interest in the disclosure of the record outweighs the harm contemplated in the provision in question.

## **13. GROUNDS FOR REFUSAL OR ACCESS TO A RECORD**

- 13.1 In terms of Sections 62 to 69 of PAIA, access granted to a record may be refused on one or more of the following grounds –
- 13.1.1. protection of privacy to a third party who is a natural person;
  - 13.1.2. protection of the commercial information of a third party;
  - 13.1.3. protection of certain confidential information of a third person;
  - 13.1.4. protection of the safety of individuals and the protection of property;
  - 13.1.5. protection of records privileged from production and legal proceedings;
  - 13.1.6. the commercial information and activities of Globescope Security (Pty) Ltd
  - 13.1.7. the protection of research information of a third party; and
  - 13.1.8. any other ground legally available on which to refuse access to the information requested.
- 13.2 Despite any provisions of PAIA, a request must be granted if the disclosure of the record would reveal evidence of substantial contravention of, or failure to comply with, the law or imminent and serious public safety or environment risk, and the public interest in the disclosure of the record clearly outweighs the harm contemplated in terms of section 70 of PAIA.

## **14. REMEDIES FOR REFUSAL**

- 14.1 Should the requester be dissatisfied with the Information Officer's decision to refuse access, that person may, within 30 days after notification of the refusal, apply to a Court for the relief.

## **15. UPDATING OF THE MANUAL**

- 15.1 The head of Globescope Security (Pty) Ltd will on a regular basis update this manual.

