



**GERBER GOLDSCHMIDT GROUP (SA) Pty Ltd**

# **PAIA MANUAL**

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

**DATE OF COMPILATION: 06/30/2021  
DATE OF REVISION: 06/30/2025**

## 1. DEFINITIONS 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> | 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 a body which are available without a person having to submit a formal PAIA request;
- 2.2 have sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body 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 know if the body will process personal information, the purpose of processing 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 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
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

### **3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE GERBER GOLDSCHMIDT GROUP (SA) (PTY) LTD**

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

Name: Lynn Mackenzie  
Tel: 060 8273496  
Email: lynnm@gerber.co.za

### 3.2. **Deputy Information Officer**

Name: Shernaz Domingo  
Tel: 082 9258735  
Email: shernazd@gerber.co.za

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

Email: [lynnm@gerber.co.za](mailto:lynnm@gerber.co.za)

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

Postal Address:

PO Box 200, Vlaeberg, Cape Town, Western Cape, 8000

Physical Address: Unit 3D, The Matrix Business Centre, 1 Bridgeway, Century City, 7441

Telephone: 021 110-5135

Email: [info@gerber.co.za](mailto:info@gerber.co.za)

Website: [www.gerber.co.za](http://www.gerber.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 and private 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 or private 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 IO 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-

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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 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.*

- 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;
- 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>.

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<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.”

4.4. 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.

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/infoereg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours- 8am-5pm (SAST)

4.6.1 English and Afrikaans

## 5. **LATEST NOTICES IN TERMS OF SECTION 52 (2) OF PAIA**

At this stage, no notice (s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

## 6. **DESCRIPTION OF THE RECORDS OF GERBER GOLDSCHMIDT GROUP (SA) (Pty) Ltd, WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION.**

Category of Records	Applicable Legislation
Memorandum of incorporation Share Registers Red books Minutes Resolutions Agreements UBO records	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

Insolvency proceeds, Liquidation notices Debt settlements	Insolvency Act, No. 24 of 1936 (Section 134 and 155);
Pension forms Guides/Manuals Pension Fund Contributions Administration records Employee benefit records	Pension Funds Act, No. 24 of 1956;
Financial Statements SARS E-Filing profiles Tax Returns Employee tax records (IRP5) PAYE records SARS correspondence	Income Tax Act, No. 58 of 1962 (Section 75);
Copyright ownership records Intellectual Property documentation Licensing agreements	Copyright Act, No. 98 of 1978;
Regional services levies (RSC) payment records (legacy data)	Regional Services Councils Act, No. 109 of 1985;
SARS E-Filing profiles VAT returns Input and output tax records Invoices Supporting financial records	Value Added Tax Act, No. 89 of 1991 (Section 65);
Health and Safety File Incident reports Training records Claims submitted	Occupational Health and Safety Act, No. 85 of 1993;
COIDA registration documents, Accident reports, Training records, Compliance inspection reports	Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993 (Section 97);
Employee Disciplinary records Dispute resolution documentation CCMA records Union Agreements Handbook Personnel records for the Company's employees	Labour Relations Act, No. 66 of 1995;

<p>Employment Contracts Policies and Procedures Leave records Attendance registers Salary registers</p>	<p>Basic Conditions of Employment Act, No. 75 of 1997 (Section 31);</p>
<p>Employment equity plans Reports submitted to the Department of Labor Demographic stats</p>	<p>Employment Equity Act, No. 55 of 1998 (Section 26);</p>
<p>Workplace Skills Plan Training Records Learnerships</p>	<p>Skills Development Act, No. 97 of 1998;</p>
<p>Medical Aid contributions Employee Scheme membership records</p>	<p>Medical Schemes Act, No. 131 of 1998;</p>
<p>SDL payment records Correspondence with SETA Levy returns</p>	<p>Skills Development Levies Act, No. 9 of 1999; and</p>
<p>UIF Contribution records Declaration to the UIFR Employee termination records</p>	<p>Unemployment Insurance Act, No. 63 of 2001.</p>

*Please note that this list is not exhaustive, nevertheless the body does its utmost to stay abreast of amended and new legislation as it becomes available.*

**7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE GERBER GOLDSCHMIDT GROUP (SA) (Pty) Ltd.**

Subjects on which the body holds records	Categories of records
Strategic Documents Plans Proposals	Business Plans Annual Reports, Strategic Planning documents Annual objectives and targets Board Approved strategies Organizational performance reports
Human Resources	HR policies and procedures Advertised posts Employees contracts Employee personal records Payroll and salary records Leave and attendance records Training and development records Disciplinary and grievance records Recruitment and selection documentation Employment equity reports
Finance	Finance Policies and Procedures Annual Financial Statements Budgets and Forecasts Tax returns and submissions VAT and PAYE records Invoices and receipts Bank statements and reconciliations Audit reports SARS documents Management Accounts Cash flow
Compliance	Regulatory filings Internal compliance policies and procedures Risk Assessments Health and Safety records Environmental compliance records Ethics and whistleblowing reports Contracts FICA Documents Company Information Banking information

Company Secretarial	Registers of directors and shareholders Organograms CIPC filings Red books Agreements Info Docs- holding Director, Company, and Shareholder information SigniFlow holding signed documents Board and shareholder resolutions Minutes of meetings Company Registration documentation Share Certificates and related correspondence
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## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

- 8.1.1 The purpose for which the Company Processes or will Process Personal information is to provide accounts and/or services to the Client in accordance with terms agreed to by the Client;
- 8.1.2 To undertake activities related to the provision of accounts and/or services to the Client;
- 8.1.3 To verify the identity of the Client;
- 8.1.4 For risk assessment, information security management, statistical, trend analysis and planning purposes;
- 8.1.5 To monitor and record calls and electronic communications with the Client for quality, training, investigation, and fraud prevention purposes;
- 8.1.6 For crime detection, prevention, investigation, and prosecution;
- 8.1.7 To enforce or defend the Company's rights;
- 8.1.8 To manage the Company's relationship with the Client, which may include providing information to the Client about the Company's products and/or service;
- 8.1.9 Any additional purposes expressly authorized by the Client; and
- 8.1.10 Any additional purposes may be notified to the Client or Data Subjects in any notice provided by the Company.

**8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto.**

<b>Categories of Data Subjects</b>	<b>Personal Information that may be processed</b>
Customers / Clients	Full name and contact details (address, phone, email) ID or registration number Banking and payment information Credit History and Financial Data Purchase History and preferences Communication records Tax numbers
Service Providers	Contact person's name and contact details Company Registration and VAT number Banking details B-BBEE certificates and compliance documentation Contractual terms and invoices
Employees	Full name and contact details ID number, gender, race, and DOB Employment History Remuneration and benefits information Bank Account and tax details Leave records and disciplinary history Medical Aid and pension details Emergency contact details
Directors	Full name, ID/passport number Contact information Directorships and interests Declarations of conflict of interest CIPC records and related filings
Shareholders	Name and contact details Shareholding details ID or registration number Share certificates and dividend payment information Resolutions and voting records

Subsidiary and Associate Companies	Company name and registration details Contact persons and representatives Financial records and intercompany agreements Ownership and control structures Correspondence and contractual documents
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**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 Background screening agencies HR Departments
Criminal record information	Security Clearances agencies Professional regulatory bodies Vetting partners
Qualifications for qualification Verifications	South African Qualifications Authority Educational Institutions
Employment History	HR Department Prospective employers (with consent)
Credit and payment history, for credit information	Credit Bureaus (e.g. Transunion, Experian) Financial Institutions Auditors
Tax number and Financial Data	SARS Auditors Payroll processors
Demographic Information (race, gender etc.)	Department of Labour
Medical Health Information	Medical aid administrators Wellness service providers

	COIDA/WCA offices
Disciplinary and grievance records	Internal HR and Legal
Signature and consent forms	Legal departments Auditors Contracting parties

## 8.4 Planned transborder flows of personal information

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa:

- 8.4.1 If the recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; OR
- 8.4.2 If the Data Subject consents to the transfer of their Personal Information; or
- 8.4.3 If the transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- 8.4.4 If the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

## 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

The Company shall implement the following security measures in order to ensure that Personal Information is respected and protected:

### 8.5.1 Access Control of Persons:

The Company shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data is processed.

### 8.5.2. Data Media Control

The Company undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by the Company and containing personal data of clients.

### 8.5.3. Data Memory control

The Company undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorized reading, alteration, or deletion of stored data of the Data Exporters customers.

### 8.5.4. User Control

The Company shall implement suitable measures to prevent its data processing systems from being used by unauthorized persons by means of data transmission equipment.

8.5.5. **Access Control to Data**

The Company represents that the persons entitled to use the Company's data processing system are only able to access the data within scope and to the extent covered by their respective access permissions (authorization).

8.5.6. **Transmission Control**

The company shall implement suitable measures to prevent Personal information from being read, copied, altered, or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

8.5.7. **Organization Control**

**The Company** shall maintain its internal organization in a manner that meets the requirements of this Manual.

A preliminary assessment of the suitability of the information security measures implemented or to be implemented by the Company may be conducted in order to ensure that the Personal Information that is processed by the Company is safeguarded and processed in accordance with the Conditions for lawful Processing.

**9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

9.1.1 on [www.gerber.co.za](http://www.gerber.co.za) if any;

9.1.2 It is recorded that any and all documents/information requested pertaining to the aforesaid shall only be available to a requester subject to the provisions of the Act.

9.1.3 None of the information held by the Company is available automatically without a person having to request access in terms of and subject to the provisions of the Act.

9.1.4 A request for information should be in the prescribed form addressed to the Information Officer and submitted against payment of the prescribed fee.

9.1.5 This manual is available for inspection at the offices of the Company and on the Company website, free of charge.

- 9.1.6 head office of the Gerber Goldschmidt Group (SA) (Pty) Ltd for public inspection during normal business hours;
  - 9.1.7 to any person upon request and upon the payment of a reasonable prescribed fee; and
  - 9.1.8 to the Information Regulator upon request.
- 9.2 A fee for a copy of the Manual shall be payable per each A4-size photocopy made.

## 10. UPDATING OF THE MANUAL

The information Officer of the Gerber Goldschmidt Group (SA) (Pty) Ltd will update this manual on a regular basis.

***Issued by***

*Lynn Mackenzie*

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***Lynn Mackenzie, Information Officer***

# FORM 2

## 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): <input type="text"/> Facsimile: <input type="text"/>
	Cellular: <input type="text"/>
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		
<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			

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

Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
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	

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

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 (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language (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)	

**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:	

<b>FEEES</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	

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**

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**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**