

PAIA Manual (Bolttech South Africa (Pty) Ltd.)		Issue Date	28 August 2021	
Doc #	QDG 0014	Revision	#1 28 August 2021	
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COMPILED BY:	B Harrison	AUTHORISED BY:	N Dyduch	

Bolttech South Africa (Pty) Ltd.


(Registration Number: 2017/332161/07)

PRIVATE BODY MANUAL

Prepared in accordance with Section 51 of

The Promotion of Access to Information Act 2 of 2000
(the “Act”)

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1. INTRODUCTION

Bolttech South Africa (Pty) Ltd. (the “Company”) and its affiliated companies, provides leases on mobile devices for the B2B and B2C market. We also supply OEM and refurbished devices to all markets in Africa.

The Company recognises the right of access to information as embedded under section 32 of the Constitution of the Republic of South Africa, 1996. As such, the purpose of this Promotion of Access to Information Manual is to provide information on the type of records and personal information held by the Company as well as how to submit requests for access to those records in terms of the Promotion of Access to Information Act 2 of 2000 (the “Act”).

This Manual is only available in English. Copies in other languages may be made available by the Company on request.

Requests shall be made in accordance with the procedures as prescribed in this Manual. The forms and applicable tariffs are described in this Manual. The fees are described in ‘Prescribed Fees’ file.

2. COMPANY CONTACT DETAILS

In terms of PAIA Neil Dyduch is the Information Officer of Bolttech South Africa (Pty) Ltd.

However, it is recommended that the Deputy Information Officer (DIO) be used as contact person for purposes of this manual. All requests must be directed to the Deputy Information officer:

Information Officer:	Neil Dyduch
Telephone Number:	010 072 0099
Email Address:	privacy@bolttechafrica.co.za
Physical Address:	Unit 12 A Growthpoint Business Park 140 Tonetti Street Midrand Gauteng 1685
Deputy Information Officer:	Bartosz Czernek
Telephone number	010 072 0099
Email Address:	privacy@bolttechafrica.co.za
Physical Address:	Unit 12 A Growthpoint Business Park 140 Tonetti Street Midrand Gauteng 1685

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3. THE ACT

The Act grants a requester access to records of a private body, if the record 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 in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC.

The contact details of the Commission are:


Postal Address: Private Bag 2700, Houghton, 2041
Telephone Number: +27-11-877 3600
Fax Number: +27-11-403 0625
Website: www.sahrc.org.za

4. APPLICABLE LEGISLATION

Insofar as may be applicable, the Company keeps records of information to the extent required in terms of, inter alia, the following legislation:

No	Ref	Act
1	No 71 of 2008	Companies Act
2	No 75 of 1997	Basic Conditions of Employment Act
3	No 55 of 1998	Employment Equity Act
4	No 58 of 1962	Income Tax Act
5	No 66 of 1995	Labour Relations Act
6	No 89 of 1991	Value Added Tax Act
7	No 85 of 1993	Occupational Health and Safety Act
8	No 2 of 2000	Promotion of Access of Information Act
9	No 25 of 2002	Electronic Communications and Transactions Act
10	No 4 of 2013	Protection of Personal Information Act 4 of 2013;
11	No 53 of 2003	Broad Based Black Economic Empowerment Act
12	No 63 of 2001	Unemployment Insurance Act
13	No 57 of 2002	Disaster Management Act

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5. COMPANY RECORD CLASSIFICATION

Classification Number	Access	Classification
1	May be disclosed	Public access document
2	May not be disclosed	Request for, or after commencement of, criminal or civil proceedings [s7]
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information that belongs to the requester of that information [s61]
5	May not be disclosed	Unreasonable disclosure of personal information of natural person [s63(1)]
6	May not be disclosed	Likely to harm the commercial or financial interests of third party [s64(a)(b)]
7	May not be disclosed	Likely to harm a 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(3)]
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 public interest [s70]

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6. COMPANY RECORDS

Division	Record Subject	Classification
Corporate Records	Current Product Information	3
	Annual Reports	12
	Public Corporate Records	1
	Media Releases	1
	Organisational Structure	1
	Mission and Vision	1
Environmental and Health and Safety	Environmental Policy	1
	Environmental Records	11, 14
	Health and Safety Records (Employees, Contractors, Facilities)	4, 5, 9
	Disaster Management Records	4, 5, 9
Security	Physical Security Records (Visitors, Suppliers, Contractors, Employees)	4, 5
	Electronic Access & Identity Management Records (Employees, Contractors)	4, 5
	Time and Attendance Records	4, 5
Human Resources	Job Vacancies	1
	Employee Records	4, 5, 9
	Job Applicant Records	4, 5
	Employment Contracts	4, 5
	Payroll Records	4, 5
	Personnel Guidelines, Policies and Procedures	12
	Employee Medical Records	4, 5, 8
Finance	Audited Financial Statements	12
	Financial and Tax Records (Company and Employees)	4, 12
	Supplier Records	6, 7, 12, 13
	Business and Private Customer Records	4, 5, 6,
	Asset Register	12
	Insurance Records	12
Legal	General Contract Documentation	6, 7, 8, 12, 13
	Company Guidelines, Policies and Procedures	8, 10, 13
	Trade Marks	3
	Statutory Records	1
Marketing and Sales	Product Brochures	1
	Marketing and Product Strategies	12
Information Technology	System Access Records	4
Operations	Customer Information and Customer Database	4, 5, 6, 12
	Complaints and Investigations Records	4, 5, 8
	Training records and documentation	4, 5

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7. PURPOSE OF PROCESSING OF PERSONAL INFORMATION

The Company processes personal information to:

- provide goods or services;
- manage communications with customers about goods and services;
- manage communications with suppliers and business partners;
- manage employee records;
- manage supplier contracts;
- manage customer credit;
- assess risk;
- for recruitment purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- for financial and tax purposes;
- for management of access to premises;
- for management of IT system access;
- to maintain customer records;
- to help with recovery of debts;
- to identify additional products or services which may be of interest to our customers

8. RECIPIENTS WITH WHOM WE MAY SHARE PERSONAL INFORMATION

We give the following parties personal information in the ordinary course of providing our services or products:

- other companies within the group of Companies;
- our service providers and agents to allow them to perform services on our behalf;
- Original Equipment Manufacturers for the purpose of in and out of warranty repairs;
- Statutory, Law enforcement and Tax authorities where legally obliged to provide personal information;
- Employee medical schemes, financial institutions and labour unions as deemed required to fulfil services on behalf of the Company.

9. TRANS-BORDER FLOWS OF PERSONAL INFORMATION

We will only transfer personal information across the South African borders if the business processes requires such, only doing so in accordance with South African legislation, and where the recipients can guarantee the protection of personal information to the same standards as required by South African and International laws.

The personal information that we collect or receive about you may be transferred to and processed by recipients who are located within or outside your location (such as our offices in the United Kingdom, Switzerland, Singapore, Hong Kong, or Malaysia), where the level of data protection may not be equivalent to the level of protection applicable in your location.

Where we are required to do so, data transfers will be made pursuant to legally acceptable mechanisms that ensure an adequate level of protection. Please submit a query as set out in the How to contact us

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section for more details on the third countries to which the data will be transferred.

10. SECURITY

The Company takes reasonable technical and organisational measures to ensure that personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access.

We will not retain personal information longer than the period for which it was originally needed, unless we are required by law to do so, or sell or make personal information available to any third party other than as indicated section 8 of this Manual.

11. FORM OF REQUEST

To facilitate the processing of your request, kindly:

- Use the prescribed form, available on the Company website at www.bolttech.io/za
- Address your request to the Information officer
- Provide sufficient details to enable the Company to identify:
 - The record(s) requested;
 - The requester (and if an agent is lodging the request, proof of capacity);
 - The form of access required;
 - The postal address, email address or fax number of the requester;
 - If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
- The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

12. PRESCRIBED FEES

The following applies to requests (other than personal requests):

- A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- Records may be withheld until the fees have been paid.

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