



*PAIA Manual*

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Ref:  
Rev: 0  
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## **Petrow Food Ingredients (Pty) Ltd**

(Registration Number: 2000/009680/07)

(the "Company")

### **MANUAL**

Published in terms of section 51 of the  
**PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000**  
(the "Act")



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## **1. Introduction**

The Company is a supplier of herbs, spices, seasonings and sauces in both private label and branded products. The Company also offers product solutions to local and multinational food and retail companies.

This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and the personal information the Company holds. The Manual explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA”). This manual will explain not only how to access records but also object to and request correction of personal information held by the Company, as per paragraph 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPIA”).

The PAIA and POPIA Acts give effect to every individual’s right of access to information held by the private sector or public bodies if the record or personal information is required for the exercise or protection of a right.

### **1.1. Availability of this PAIA Manual**

The manual has been published on the Company website, [www.petrovfoods.co.za](http://www.petrovfoods.co.za), or alternatively a copy may be requested from the Information Officer/Deputy Information Officer, whose details can be found under section 2 of this manual.

### **1.2. Description of Guides referred to in Section 10 of the Act**

As contemplated in Section 10 of PAIA, the Act grants a requester access to records of a private body, if the record is required for the protection of a right. If a public body lodges a request, the public body must be acting in the public’s interest.

Requests in terms of the Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs 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.

Guides to the PAIA and POPIA Acts can be obtained, and queries directed to:



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**PAIA**

South African Human Rights Commission  
Promotion of Access to Information Act Unit  
Research and Documentation Department  
Private Bag X2700  
Houghton  
Johannesburg  
2041  
Telephone number: (011) 484 8300  
Fax number: (011) 484 7146/7  
Website: [www.sahrc.org.za](http://www.sahrc.org.za)  
E-mail: [PAIA@sahrc.org.za](mailto:PAIA@sahrc.org.za)

**POPIA**

Information Regulator  
33 Hoofd Street  
Forum III, 3<sup>rd</sup> Floor, Braampark  
P.O Box 1533  
Braamfontein  
Johannesburg  
2017  
Telephone number: (012) 406 4818  
Fax number: 086 500 335  
Website: [www.justice.gov.za/inforeg](http://www.justice.gov.za/inforeg)  
E-mail: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

**2. Company contact details**

Designated or duly authorised persons contact details:

<b>Information Officer</b> Robert Francis Gawith	
<b>Deputy Information Officers</b> Anna-Marie Smuts	
<b>Postal Address</b>	PO Box 11172, Randhart, 1457
<b>Physical Address</b>	16 Endean Street City Deep
<b>Telephone number</b>	011 613 2702
<b>E-mail address</b>	<a href="mailto:annamarie@petrowfoods.co.za">annamarie@petrowfoods.co.za</a>

### 3. Company records

The Company has records available in terms of various laws, including:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Consumer Protection Act 68 of 2008
- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Promotion of Access to Information Act 2 of 2000
- Skills Development Act 9 of 1999
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

Access to these records is subject to the provisions laid out in paragraph 5 and 6 of this PAIA Manual.

#### 3.1. Company records classification key

CLASSIFICATION NO.	ACCESS	CLASSIFICATION
1	May be disclosed	Public Access Information
2	Limited disclosure	Personal Information belonging to the requester of that information
3	May not be disclosed	Unreasonable disclosure of personal information, not belonging to the requester.
4	May not be disclosed	Likely to compromise the safety of individuals or protection of property
5	May not be disclosed	Commercial information of Private Body
6	May not be refused	Disclosure in public interest
7	May not be disclosed	Likely harm the commercial or financial interest of a third party

### 3.2. Available records

DEPARTMENT	SUBJECT	CLASSIFICATION NO.
<b>Governance</b>	Board and Management Records	5
	Policies and Procedures	
	Management reports	
	Resolutions	
	Auditor Reports	
<b>Finance</b>	Audited Financial Reports	5
	Tax Records (Company & Employee)	5
	Asset Register	5
	Management Accounts	5
	Employee Records	2,3 and 4
	Employee Contracts	2 and 3
	Banking records	2 and 3
	Invoices	2 and 3
<b>Legal</b>	General Contract Documentation	5 and 7
	Company guidelines, policies and procedures	5
<b>Sales and Marketing</b>	Product brochures and catalogues	1
	Customer Information Database	2 and 5
	Performance records	5
	Current Product Information	1
	Supply chain database	2, 3 and 5
<b>Other Party Records</b>	Personnel, member or private body records which another party holds, as opposed to the records Petrow Foods Ingredients holds	2 and 5

### 4. Processing of Personal Information

Petrow Food Ingredients is committed to protecting the privacy of personal information, giving effect to the constitutional right to privacy and fulfil its obligations under POPIA. The relevant personal information privacy principles relating to the processing (including but not limited to collection, storing, archiving, sharing, correction and deletion) will be applied to any personal information processed by the Company.

**4.1. The purpose of processing personal information by the Company**

The Company processes personal information for a variety of purposes, including but not limited to the following:

- To maintain member records
- For recruitment purposes
- For employment purposes
- For general admin, financial and tax purposes
- For legal or contractual purposes
- For health and safety purposes
- To monitor access to, secure and manage the property and facilities
- To transact with suppliers and business partners
- To assist in improving the quality of facilities and services

**4.2. Categories of data subjects and personal information the Company processes**

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION PROCESSED
Customers and potential customers	Contact information of interfacing employees, Contracts, Juristic individual invoicing information incl but not limited to trading name, physical address, VAT number
Suppliers	Personal Information of supplier and supplier representative contact information, contracts
Employment candidates	Curriculum vitae of candidate, copy of SA ID document, criminal check, employment background check
Employees	Personal Information, medical information and next of kin personal information, employment contracts, performance records, health and safety records, time keeping and attendance records, payroll records, training records, pension / provident fund records where applicable
Visitors	Physical access records including full name and contact number

### **4.3. Categories of recipients with whom personal information is shared**

The Company may share the Personal Information of data subjects for any of the purposes outlined in Section 4.1. with the below listed:

- Our third-party service providers who perform services on our behalf  
No personal information of data subjects will be shared with any third-party, unless we have written consent to do so, or where:
- We are obliged to provide such information for legal or regulatory purposes
- We are required to do so for purposes of existing or future legal proceedings
- We are involved in the prevention of fraud, loss, bribery or corruption
- They perform a service on our behalf that requires the processing of personal information
- The sharing of information is required to provide or manage a service to the data subjects

### **4.4. Information security measures**

Petrow Food Ingredients will always endeavour to implement processes and systems to protect the personal information we hold.

The following procedures are in place to protect your personal information:

- The Information Officer is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPIA;
- Personal information that is collected is securely stored and only permitted persons have access to the information, that is only processed for the purpose for which it is required.

## **5. Form of request**

To request access, correction, or deletion of a record:

- 5.1. Use the prescribed form, available as part of this manual and published on the Company website: [www.petrowfoods.co.za](http://www.petrowfoods.co.za)
- 5.2. Address your request to the Information Officer or Deputy Information Officer at [annamarie@petrowfoods.co.za](mailto:annamarie@petrowfoods.co.za)
- 5.3. Ensure that sufficient details have been provided in order for the Company to identify:
  - a. The record(s) requested
  - b. The requester (and if the request is being lodged by a third-party, proof of capacity)
  - c. The form of access required
  - d. The postal address and e-mail address of the requester, inside the Republic of South Africa
  - e. If the requester wishes to be informed of the decision in any manner, (in addition to written) advise the manner in which they are to be informed





- f. The right in which the requester is wishing to exercise or protect, including an explanation of the reason the record is required to exercise such right.

## 6. Prescribed fees

The following fees apply to requests, excluding personal requests:

- A requester is required to pay a R50 prescribed fee before a request will be processed
- If the preparation of the record requested requires more than the prescribed six (6) hours, a quote will be prepared if access is granted, and sent to the requester for approval and payment of a deposit prior to the processing of the request
- Records may be withheld until fees have been paid in full

## 7. Remedies

Should a request be denied, requesters may make use of the Company's internal appeal procedure:

- Use the prescribed form, available as part of the manual, and published on the Company website: [www.petrowfoods.co.za](http://www.petrowfoods.co.za)
- Address the appeal to the Deputy Information Officer at [annamarie@petrowfoods.co.za](mailto:annamarie@petrowfoods.co.za)
- Should you not be satisfied with the decision following the internal appeal process, you may lodge a complaint directly with the Information Regulator or make an application to a court of law for relief.

\*\*\*\*\*



**ANNEXURE A**

**FORM FOR APPLICATION OF INFORMATION  
REQUEST FOR ACCESS TO RECORDS OF PRIVATE BODY**

In terms of Section 53(1) of the Promotion of Access to Information Act, 2000 (Act 2 of 2000)

**A. Particulars of Private Body**

---

**B. Particulars of person requesting access to the record**

- a) The particulars of the person who requests access to the record must be given below.  
b) The address and/or email address, in the Republic, to which the information is to be sent must be given below.  
c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname : \_\_\_\_\_

Identity Number : 

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Postal Address : \_\_\_\_\_

E-mail address : \_\_\_\_\_

Telephone number : (\_\_\_\_) \_\_\_\_\_

Capacity in which request is made, when made on behalf of another person: \_\_\_\_\_

**C. Particulars of person on whose behalf request is made**

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname : \_\_\_\_\_

Identity Number : 

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--



**D. Particulars of record**

- a) 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.
- b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

---

2. Reference number, if available:

---

3. Any further particulars of record:

---

**E. Fees**

- a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- b) You will be notified of the amount required to be paid as the request fee.
- c) The fee payable for access to a record depends on the form in which the access is required and the reasonable time required to search for and prepare a record.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

---

---

**F. Form of access to record**

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability: \_\_\_\_\_ Form in which record is required: \_\_\_\_\_

**Mark the appropriate box with an X.**

Notes:

- a) Compliance with your request for access in the specified form may depend on the form in which the record is available.
- b) Access in the form requested may be refused in certain circumstances. In such case you will be informed if access will be granted in another form.
- c) The fee payable for access to the record, if any, will be determined partly by the form in



**1. If the record is in written or printed form:**

	Copy of record*		Inspection of record
--	-----------------	--	----------------------

**2. If record consists of visual images – (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):**

	View the images		Copy the images*		Transcription of the images*
--	-----------------	--	------------------	--	------------------------------

**3. If record consists of recorded words or information which can be reproduced in sound:**

	Listen to the soundtrack (audio USB)		Transcription of soundtrack *(written or printed document)
--	--------------------------------------	--	--

**4. If record is held on computer or in an electronic or machine-readable form:**

	Printed copy of record*		Printed copy of information derived		Copy supplied on USB*
--	-------------------------	--	-------------------------------------	--	-----------------------

\*If you requested a copy of the transcription of a record (above), do you wish the copy or transcription to be posted to you?  
Postage is payable.

**G. Particulars of right to be exercised or protected**

If the provided space is inadequate, please continue on a separate folio and attach it to this form.

**The requester must sign all the additional folios.**

1. Indicate which right is to be exercised or protected:

---

2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

---

**H. Notice of decision regarding request for access**

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.



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How would you prefer to be informed of the decision regarding your request for access to the record?

\_\_\_\_\_

Signed at \_\_\_\_\_ this day \_\_\_\_\_ of \_\_\_\_\_ year \_\_\_\_\_

.....  
Signature of Requester / Person on  
whose behalf the request was made



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**ANNEXURE B**

**FEES**

**Copies of this PAIA manual**

Copies of this manual are R1.10 for every A4 page

**Reproduction fees:**

Type of Record	Fee
Every photocopy of an A4 page Every printed copy of an A4 page from a computer or computer-readable form	R1.10
For a copy in a computer-readable form on: • USB	R100.00
A transcript of visual images for an A4 page	R20
To search for a record that must be disclosed (per hour or part thereof reasonably required for searching)	R30 per hour
If a copy or a record needs to be posted, the requester must pay the actual postage fee	Postage cost charged
Requester submitting a legitimate request to access information about a data subject, other than the requester	R50.00



**ANNEXURE C**

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION**

In terms of Section 11(3) of the Protection of Personal Information Act, 2013 (Act 4 of 2013) and Regulations relating to the protection of personal information, 2018 (Regulation 2)

**Note:**

1. You may wish to attach affidavits or documentary evidence to support the objection.
2. If the space provided on this form is not sufficient, you may submit additional information as annexures to this document and sign each page.
3. Complete the sections that apply to you.

**A. Details of data subject:**

Name(s) and surname/registered name of data subject \_\_\_\_\_

Unique identifier or identity number \_\_\_\_\_

Residential, postal or business address \_\_\_\_\_

\_\_\_\_\_ Code \_\_\_\_\_

Contact number(s) \_\_\_\_\_

E-mail address \_\_\_\_\_

**B. Details of the responsible party:**


Name and surname/registered name of responsible party \_\_\_\_\_

Residential, postal or business address \_\_\_\_\_

\_\_\_\_\_ Code \_\_\_\_\_

Contact number(s) \_\_\_\_\_

E-mail address \_\_\_\_\_

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**C. Reasons for objection in terms of Section 11(1)(d) to (f):**

(Please provide detailed reasons for the objection) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_ day of \_\_\_\_\_ 20\_\_

.....  
Signature of Requester / Person on  
whose behalf the request was made





**ANNEXURE D**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION / DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION**

In terms of Section 24(1) of the Protection of Personal Information Act, 2013 (Act 4 of 2013) and Regulations relating to the protection of personal information, 2018 (Regulation 2)

**Note:**

- D. You may wish to attach affidavits or documentary evidence to support the objection.
- E. If the space provided on this form is not sufficient, you may submit additional information as annexures to this document and sign each page.
- F. Complete the sections that apply to you.

**Request for:**

Mark the appropriate box with an "X"	
Correction or deletion of the personal information about the data subject that the responsible party possesses or controls	
Destroying or deletion of a record of personal information about the data subject that the responsible party possesses, or controls and the responsible party is no longer authorised to retain the record of information	

**A. Details of data subject:**

Name(s) and surname/registered name of data subject \_\_\_\_\_

Unique identifier or identity number \_\_\_\_\_

Residential, postal or business address \_\_\_\_\_

\_\_\_\_\_ Code \_\_\_\_\_

Contact number(s) \_\_\_\_\_

E-mail address \_\_\_\_\_

**B. Details of the responsible party:**

Name and surname/registered name of responsible party \_\_\_\_\_

Residential, postal or business address \_\_\_\_\_



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Code

Contact number(s)

E-mail address

C. Reasons for correcting or deleting the personal information about the data subject in terms of Section 24(1)(a) that the responsible party possesses and controls, And/or Reasons for destroying or deleting a record of personal information about the data subject in terms of Section 24(1)(b) that the responsible party is no longer authorised to retain:

(Please provide detailed reasons for the request)

Signed at this day of 20

Signature of Requester / Person on whose behalf the request was made

**ANNEXURE E**

**NOTICE OF INTERNAL APPEAL**

Section 75 of the Promotion of Access to Information Act, 2000(Act No. 2 of 2000)  
 (Regulation 8)

STATE YOUR REFERENCE NUMBER: .....

**A. Particulars of private body**

The Information Officer/Deputy Information Officer:

\_\_\_\_\_

Registered name of Responsible Party:

\_\_\_\_\_

E-mail address: \_\_\_\_\_

**B. Particulars of requester/third party who lodges the internal appeal**

- a. The particulars of the person who lodges the internal appeal must be given below.
- b. Proof of the capacity in which the appeal is lodged, if applicable, must be attached.
- c. If the appellant is a third party and not the person who originally requested the information, the particulars of the requester must be given at C below.

Full names and surname: .....

Identity number: 

--	--	--	--	--	--	--	--	--	--	--	--	--	--

Postal address: .....

Telephone number: (.....).....

E-mail address: .....

Capacity in which an internal appeal on behalf of another person is lodged:.....



**C. Particulars of requester**

This section must be completed ONLY if a third party (other than the requester) lodges the internal appeal.

Full names and surname: .....

Identity number: 

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

**D. The decision against which the internal appeal is lodged**

Mark the decision against which the internal appeal is lodged with an X in the appropriate box:

	Refusal of request for access
	Decision regarding fees prescribed in terms of section 22 of the Act
	Decision regarding the extension of the period within which the request must be dealt with in terms of section 26(1) of the Act
	Decision in terms of section 29(3) of the Act to refuse success in the form requested by the requester
	Decision to grant request for access

**E. Grounds for appeal**

If the provided space is inadequate, please continue on a separate folio and attached it to this form. You must sign all the additional folios.

State the grounds on which the internal appeal is based:

.....  
.....  
.....  
.....



State any other information that may be relevant in considering the appeal:

.....  
.....  
.....

**F. Notice of decision on appeal**

You will be notified in writing of the decision on your internal appeal. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

State the manner: .....

Particulars of manner: .....

Signed at ..... this day ..... of ..... Year .....

.....  
Signature of appellant

**FOR COMPANY USE:**  
**OFFICIAL RECORD OF INTERNAL APPEAL:**  
Appeal received on .....(date) by .....(name of information officer/deputy information officer).  
Appeal accompanied by reasons for the information officer's/deputy information officer's decision and where applicable, the particulars of any third party to whom or which the record relates, submitted by the information officer/deputy information officer on .....(date).  
**OUTCOME OF APPEAL:** .....