

PAIA MANUAL

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

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer;
1.3	“IO”	Information Officer;
1.4	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.5	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.6	“Regulator”	Information Regulator; and
1.7	“Republic”	Republic of South Africa

2. INTRODUCTION

This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and personal information Freedom Won (Pty) Ltd (“Freedom Won / the Company”) holds and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA Act”). In addition, it explains how to access, or object to, personal information held by Freedom Won, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPI Act”). The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. Requests shall be made in accordance with the prescribed procedures, at the rates provided.

3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 3.2 have a 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;
- 3.3 know the description of the records of the body which are available in accordance with any other legislation;

- 3.4 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;
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 know if the body 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;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 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
- 3.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF FREEDOM WON (PTY) LTD

4.1. Chief Information Officer

Name: Antony John English
 Tel: +27(0)10 597 7794
 Email: antony@freedomwon.co.za

4.2. Deputy Information Officers

Name: John Anderson
 Tel: +27(0)10 476 3407
 Email: john@freedomwon.co.za

Name: Tina Dhevalall
 Tel: +27(0)10 476 3386
 Email: tina@freedomwon.co.za

4.3 Access to information general contacts

Email: info@freedomwon.co.za

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

5.1. 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.

5.2. The Guide is available in each of the official languages and in braille.

5.3. The aforesaid Guide contains the description of-

5.3.1. the objects of PAIA and POPIA;

5.3.2. the street address and phone number and, if available, electronic mail address of-

5.3.2.1. the Information Officer of every private or public body, and

5.3.2.2. the Deputy Information Officers of every private or public body;

5.3.3. the manner and form of a request for-

5.3.3.1. access to a record of a private body contemplated in section 50;

5.3.4. the assistance available from the IO of a private body in terms of PAIA and POPIA;

5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

5.3.6. 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-

5.3.6.1. an internal appeal;

5.3.6.2. a complaint to the Regulator; and

5.3.6.3. 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;

- 5.3.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 5.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 5.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
 - 5.3.10. the regulations made in terms of section 92.
- 5.4. 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.
- 5.5. The Guide can also be obtained-
- 5.5.1. upon request to the Deputy Information Officers; or
 - 5.5.2. from the website of the Regulator (<https://info regulator.org.za/paia-guidelines/>).
- 5.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
- 5.6.1 English
 - 5.6.2 Afrikaans
- 5.6 Any PAIA or POPIA request forms are available on the Regulator website:
- POPIA - <https://info regulator.org.za/popia-forms/>
- PAIA - <https://info regulator.org.za/paia-forms/>
- 5.7. Any fees applicable to provide records are prescribed by the Information Regulator and can be found in the Regulations at Annexure B thereto:
- Annexure B: Fees - [Promotion of Access to Information Act: Regulation: Promotion of Access to Information \(info regulator.org.za\)](https://info regulator.org.za/Promotion%20of%20Access%20to%20Information%20Act%20Regulation%20Promotion%20of%20Access%20to%20Information)

In circumstances where the deposit is paid by the requester and the request for access is subsequently refused, Freedom Won will refund the deposit to the requester.

6. CATEGORIES OF RECORDS OF FREEDOM WON (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record
Product Information	Product Information Training Material Product Warranties Media releases
Company Information	Company registration documents Company Profile

7. DESCRIPTION OF THE RECORDS OF FREEDOM WON WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY FREEDOM WON

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records (contact details, employment history, ID numbers, race, ethnicity, education background) - Third party contracts

Finance	<ul style="list-style-type: none"> - Financial and Banking details - Creditors records (contact details) - Debtors records (contact details, bank details, FICA related and KYC documentation, company registration documents)
Procurement	<ul style="list-style-type: none"> - Financial and banking details - Supplier documents (invoices, company registration and information documents)

9. PROCESSING OF PERSONAL INFORMATION

9.1 Purpose of Processing Personal Information

Freedom Won takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy laws. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by the Company.

9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

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

We further process personal information for the following purposes, including but not limited to:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact the Company;
- to maintain customer records;
- for recruitment purposes;
- for employment purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- to transact with our suppliers and business partners;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;

- to help us recover debts; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

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

We share personal information of our data subjects with the following:

- our authorised Freedom Won branches / divisions;
- our carefully selected business partners who provide products and services under one of our brands; and
- our service providers and agents who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, except if:

- 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 services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects; or
- needed to help us improve the quality of our products and services.

We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them. We will only disclose personal information to government authorities if we are required to do so by law. Our employees, and our suppliers, are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

9.4 Security Measures implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Reasonable technical and organizational measures have been implemented for the protection of personal information processed by Freedom Won and its operators. In terms of the POPI Act, operators are third parties that process personal information on behalf of the Company. We continuously implement and monitor technical and organizational security measures to protect the personal information we hold, against unauthorized access, as well as accidental or willful manipulation, loss or destruction. We will take steps to ensure that operators that process personal information on behalf of the Company apply adequate safeguards as outlined above.

10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available-

10.1.1 on our website www.freedomwon.co.za ;

10.1.2 registered office of Freedom Won for public inspection during normal business hours;

10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

10.1.4 to the Information Regulator upon request.

10.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

11. UPDATING OF THE MANUAL

The Deputy Information Officers as well as a representative of the Legal Department of Freedom Won will review and update this manual annually or as and when there are amendments to privacy laws within the Republic.

Issued by



Tina Dhevalall

Deputy Information Officer