



TRANSPACO LIMITED
REGISTRATION NUMBER 1951/000799/06
("The Company" or "Transpaco")

THE PROMOTION OF ACCESS TO INFORMATION MANUAL

("PAIA Manual")



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TRANSPACO LIMITED PAIA MANUAL

This Manual is published in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("the Act"). The Act gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information held by the State and to information held by another person that is required for the exercise and/or protection of any right. The reference to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

1.1 TRANSPACO LIMITED OVERVIEW

Transpaco Limited is a manufacturer, recycler and distributor of paper and plastic packaging products for a broad range of industries within the core focus of packaging throughout South Africa and Africa. Transpaco Limited supports the constitutional right of access to information and we are committed to provide you access to our records in accordance with the provisions of the Act, the confidentiality we owe third parties and the principles of South African law.

The Transpaco Limited consists of the following companies:

Company	DIO/IO
East Rand Plastics (Pty) Ltd	Wessel Richter
Transpaco Flexibles (Pty) Ltd	Christo Potgieter
Transpaco Flexibles Mpumalanga (Pty) Ltd	Janine Laurie
Britepak Trading (Pty) Ltd	Steve Crowley
Transpaco Cores and Tubes (Pty) Ltd	Kershia Palmer
Transpaco Specialised Films (Pty) Ltd	Johan Steyn
Future Packaging & Machinery (Pty) Ltd trading as Transpaco & Future Packaging	Cindy Downs
Booyens Road Properties (Pty) Ltd	Ilse Uys
Explosive Film Technologies (Pty) Ltd	Ilse Uys
Snap Shot Investments (Pty) Ltd	Ilse Uys
Transpaco Administration and Financial Services (Pty) Ltd	Ilse Uys

1.2 AVAILABILITY OF THIS MANUAL

Further copies of this manual can be obtained or inspected at Transpaco Limited's offices at the address listed in Section 1.4.

This manual, or updated versions thereof, can also be found on Transpaco's website at www.transpaco.co.za



1.3 HOW TO REQUEST ACCESS TO RECORDS HELD BY TRANSPACO LIMITED

Requests for access to records held by Transpaco Limited must be made on the request form that is available on our website, from the SAHRC website (www.sahrc.org.za) or the Department of Justice and Constitutional Development (www.doj.gov.za) (under "regulations"). Note that requests need not be accompanied by payment BUT will only be processed upon payment of the prescribed fees.

Requests for access to records must be made to our Information Officer at the address, email address provided below.

The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required and indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right. If a request is made on behalf of a person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer of the Transpaco Limited

The standard form that must be used for the making of requests is attached as Annexure 1. Not using this form could cause your request to be refused (if you do not provide sufficient information or otherwise) or delayed.

Kindly note that all requests to Transpaco Limited will be evaluated and considered in accordance with the Act. Publication of this manual and describing the categories and subject matter of information held by Transpaco Limited does not give rise to any rights (in contract or otherwise) to access such information or records except in terms of the Act.

1.4 CONTACT DETAILS - SECTION 51 (1) (A)

Name of Private Body: Transpaco Limited
Registration Number: 1951/000799/06
Designated Information Officer: Ilse Uys
Deputy Informational Officers: Christo Potgieter
Cindy Downs
Janine Laurie
Johan Steyn
Kershia Palmer
Steve Crowley
Wessel Richter
Email address of Information Officer: requests@transpaco.co.za

Postal Address: PO Box 39601, Bramley, 2018
Street Address: 331 Sixth Street, Wynberg, Sandton, 2090
Phone Number: +27 11 887 0430
Fax Number: +27 11 887 0434

1.5 ACCESS THE GUIDE AS DESCRIBED IN SECTION 10 OF THE ACT – SECTION 51 (1) (B)

Section 10 of the PAIA requires a guide be published by the Information Regulator (South Africa) with regard to reasonable requests by a person wishing to exercise or protect any rights in terms of the Act. Queries in this regard can be directed to the following contact details of the Information Regulator:

The Information Regulator (South Africa)

Postal Address: P.O Box 31533
Braamfontein
2017

Business Address: JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Email address: infoereg@justice.gov.za

Website: www.justice.gov.za

1.6 RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION SECTION 51 (1)(C)

In so far as may be applicable information is available in terms of the following legislation, if and where applicable:

- Basic Conditions of Employment No. 75 of 1997
- Broad Based Black Economic Empowerment Act No.53 of 2003
- Companies Act 61 of 1973
- Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- Consumer Protection Act 68 of 2008;
- Electronic Communications and Transactions Act 25 of 2002.
- Insurance Act 27 of 1943
- Income Tax Act 95 of 1967
- Labour Relations Act 66 of 1995
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act No. 2 of 2000
- Regulation of Interception of Communications and Provisions of Communications-related Information Act 70. of 2002
- Skills Development Levies Act No. 9 of 19 99
- Skills Development Act No. 97 of 1998
- Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

1.7 RECORDS HELD BY TRANSPACO LIMITED AVAILABLE ON REQUEST – SECTION 51 (1) (D)

Transpaco Limited maintains records on the following categories and subject matters. However, please note that recording a category or subject matter in this manual does not imply that a request for access to such records would be honoured. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act.

Internal Records

- Memorandum and Articles of Association
- Financial records
- Operational records
- Intellectual property
- Marketing records
- Product records
- Statutory records
- Internal policies and procedures

1.7.1 Personnel Records

Personnel refers to any person who works for or provides services to or on behalf of the Transpaco Limited and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of Transpaco Limited This includes, without limitation, directors, executive directors, non-executive directors, all permanent, temporary and part-time staff as well as contract workers.

Personnel records include the following:

- Any personal records provided to the Transpaco Limited by their personnel;
- Any records a third party has provided to the Transpaco Limited about any of their personnel
- Conditions of employment and other personnel-related contractual and quasi legal records
- Internal evaluation records; and
- Other internal records and correspondence.

1.7.2 Customer Records

Please be aware that the Transpaco Limited is very concerned about protecting the confidential information of its customers. Please motivate any request for customer information very carefully, having regard to Sections 63 to 67 of the Act.

Customer information includes the following:

- Any records a customer has provided to Transpaco Limited or a third party acting for or on behalf of Transpaco Limited;
- Customer needs assessments;
- Personal records of customers;
- Credit information and other research conducted in respect of customers;
- Any records a third party has provided to Transpaco Limited about customers;
- Confidential, privileged, contractual and quasi legal records of customers;
- Customer evaluation records;
- Records generated by or within Transpaco Limited pertaining to customers, including transactional records.

1.8 PROTECTION OF PERSONAL INFORMATION

Personal information is any information relating to an identifiable living individual or an identifiable, existing juristic person. We collect and use personal information to provide our products and services, and to manage our company. You can find more information about how we use personal information in our Privacy Statement available on our website www.transpaco.co.za.

1.8.1 Categories of data subjects and the purposes for which information is collected and used

A description of the categories of data subjects whose information we collect, hold and process as well as the purpose for which we collect and use their personal information is provided below:

Categories of Data Subjects	Purpose for which information is collected and used
Customers	<ul style="list-style-type: none"> • Performing duties in terms of any agreement with customers. • Make, or assist in making, credit decisions about customers. • Operate and manage customers' accounts and manage any application, agreement or correspondence customers may have with the Transpaco Group. • Communicating (including direct marketing) with customers by email, SMS, letter, telephone or in any other way about Transpaco Group's products and services, unless customers indicate otherwise. • To form a view of customers as individuals and to identify, develop or improve products, that may be of interest to customers. • Carrying out market research, business and statistical analysis. • Performing other administrative and operational purposes including the testing of systems. • Recovering any debt customers may owe the Transpaco Group. • Complying with the Transpaco Group's regulatory and other obligations. • Any other reasonably required purpose relating to the Transpaco Group business.
Prospective Customers	<ul style="list-style-type: none"> • Verifying and updating information. • Pre-scoring. • Direct marketing. • Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Transpaco Group's business.
Employees	<ul style="list-style-type: none"> • Internal administrative, monitoring and reporting processes pertaining to current employment/ potential future employment within the organisation; • Conducting criminal, qualifications, credit and reference checks; • General matters relating to employees: <ul style="list-style-type: none"> ○ Pension ○ Medical aid ○ Payroll

Categories of Data Subjects	Purpose for which information is collected and used
	<ul style="list-style-type: none"> ○ Disciplinary action ○ Training ● Conducting audits and investigations; and ● Any other reasonably required purpose relating to the employment or possible employment relationship.
Vendors/suppliers/other business	<ul style="list-style-type: none"> ● Verifying information and performing checks; ● Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties; ● Payment of invoices; ● Complying with the Transpaco Group’s regulatory and other obligations; ● Conducting audits and investigations; and ● Any other reasonably required purpose relating to the Transpaco Group’s business
Audit and Risk Committee Members Derek Thomas Phillip Abelheim Louis Weinberg Shalom Bouzaglou Henry Andre Botha Stephen van der Linde Yolande Mahlangu	<ul style="list-style-type: none"> ● Internal administrative processes pertaining to serving on the Audit and Risk Committee of Transpaco Limited; ● Published reports such as annual reports and financial statements which will be placed on the organisation’s website for public consumption; and ● Conducting audits and investigations.
Transpaco Ltd Visitors	<ul style="list-style-type: none"> ● Internal administrative processing, monitoring, and reporting processes pertaining to access management of in and out movement of Transpaco Limited’s visitors.

1.8.2 Who receives personal information?

We share personal information with:

- Service providers to the Transpaco Limited;
- Regulators, courts, tribunals and law enforcement agencies; and
- Stakeholders involved in the operations of Transpaco Limited.

1.8.3 Cross-border flows of information

- We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with similar protection as provided for in POPIA.
- We may transfer your information to other countries which do not have similar protection as provided for in POPIA, with your consent.

1.8.4 Information security measures

- We take appropriate and reasonable technical and organisational measures to prevent any unauthorised or unlawful access, loss of, damage to or unauthorised destruction of personal information.
- We have implemented various policies, procedures and IT systems to safeguard personal information.

- We regularly verify that the safeguards are effectively implemented and ensure that they are continually updated.

1.9 OUTCOME OF YOUR REQUEST

We will decide whether to grant or decline your request within 30 days of receiving your request. We will notify you of our decision and provide reasons for accepting or refusing your request. If you request large quantities of information or if we cannot reasonably obtain the information you request within the original 30-day period, we might have to extend the period with another 30 days. We will notify you in writing if we require an extension. If we do not give you a decision on a request for access to records within the period stipulated above, it means that we refused your request in terms of section 27 of PAIA.

1.10 REASONS WHY WE MAY REFUSE YOUR REQUEST

If the record does not exist, we will inform you. If there are records that we cannot find despite a reasonable and diligent search, we will notify you with an affidavit explaining the measures we have taken to locate the record. If, after we have issued such an affidavit, we find the records, we will grant you access to the records unless the processing of the records would result in a substantial and unreasonable diversion of our resources, or unless your request is clearly frivolous or vexatious, or unless one of the grounds for refusal of access to a record as set in the PAIA applied.

For further grounds for refusal of access to records please refer to Chapter 4 of Part 2 of PAIA.

1.11 WHAT YOU CAN DO IF YOU ARE DISSATISFIED WITH A DECISION

You may appeal or complain about any of the following:

- Our refusal to grant you access to a record;
- The access fee that we charge;
- Our decision to extend the 30 days for responding to your request; and
- The way in which access is granted.

You may lodge an internal appeal or complaint against a decision as follows:

- A member of the public may lodge a complaint in writing with the Information Officer of TRANSPACO LIMITED.
- The TRANSPACO LIMITED's internal grievance procedure may be utilised by staff members.

If the complaint is that we have failed to provide access as the PAIA legislation requires, (i.e. a failure to act in terms of the Promotion of Access to Information Act, Act 2 of 2000) and we fail to resolve this through one of the above channels for complaint you may take such steps as provided for in sections 74 to 82 of the PAIA. This provides for you to:

- Complain about our decision to the Information Regulator; and
- Apply to court after following the appeal process.

28 June 2021

PN Abelheim
CEO

1.12 APPENDIX A - FORM C: REQUEST FORM

ACCESS REQUEST FORM

Requests can be submitted either via post, e-mail or fax and should be addressed to the Information Officer.

REQUEST FOR ACCESS TO THE RECORD OF A PRIVATE BODY

Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)

[Regulation 10]

FORM C

A. Particulars of private body

The Head: _____

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 fax number in the Republic to which the information is to be sent must be given.*
c) *Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname: _____

Identity number: _____

Postal address: _____

Fax number: _____ Telephone number: _____

Fax 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 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 hereunder, 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 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 a case you will be informed if access will be granted in another form.
- (c) The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.

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 of 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 (CD)

Transcription of soundtrack*

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Printed copy of record*	Printed copy of information derived from record*	Copy in computer readable form*(CD)

* If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? (POSTAGE IS PAYABLE)	YES	NO
--	------------	-----------

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.

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

YOU MUST

- 1 Complete all necessary spaces
- 2 Sign the access request form Sign additional folios completed

SEND WITH THIS APPLICATION

- The request fee
- 2 Any additional folios completed
- 3 Copy of Identity Document

Signed at this day of20.....

Signature of Requester/Person on behalf of whom request is made

1.13 APPENDIX B - FEES IN RESPECT OF PRIVATE BODIES

Description		Rand
1	The fee for a copy of the manual as contemplated in regulation 9(2)(c) - for every photocopy of an A4-size page or part thereof.	1,10
2	The fees for reproduction referred to in regulation 11(1) are as follows:	
(a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	0,75
(c)	For a copy in a computer-readable form on -	
(i)	stiffy disc	7,50
(ii)	compact disc	70,00
(d)(i)	For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii)	For a copy of visual images	60,00
(e)(i)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii)	For a copy of an audio record	30,00
3	The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2)	50,00
4	The access fees payable by a requester referred to in regulation 11(3) are as follows:	
4.1(a)	For every photocopy of an A4-size page or part thereof	1,10
(b)	For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form	0,75
(c)	For a copy in a computer-readable form on -	
(i)	compact disc	70,00
(d)(i)	For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii)	For a copy of visual images	60,00
(e)(i)	For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii)	For a copy of an audio record	30,00
(f)	To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	
4.2	For purposes of section 54(2) of the Act, the following applies:	
(a)	Six hours as the hours to be exceeded before a deposit is payable; and	
(b)	one third of the access fee is payable as a deposit by the requester.	
4.3	The actual postage is payable when a copy of a record must be posted to a requester.	

1.14 APPENDIX C - FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	

	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....

Signature of data subject/designated person

1.15 APPENDIX D - FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the request may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	

B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED
D	<p>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a)</p> <p>WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or</p> <p>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</p> <p><i>(Please provide detailed reasons for the request)</i></p>



Signed at this day of20.....

.....

Signature of data subject/ designated person