



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:

- East Rand Plastics (Pty) Ltd
- Transpaco Flexibles (Pty) Ltd
- Transpaco Flexibles Mpumalanga (Pty) Ltd
- Britepak Trading (Pty) Ltd
- Transpaco Cores and Tubes (Pty) Ltd
- Transpaco Specialised Films (Pty) Ltd
- Future Packaging & Machinery (Pty) Ltd trading as Transpaco & Future Packaging
- Booyens Road Properties (Pty) Ltd
- Explosive Film Technologies (Pty) Ltd
- Snap Shot Investments (Pty) Ltd
- Transpaco Administration and Financial Services (Pty) Ltd

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
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)

In terms of Section 10 of the Act, of the South Africa Human Rights Commission, all SA firms are obliged to publish a Guide on how to use the Act in respect of their operations within SA.

This guide can be found at www.sahrc.org.za Queries can be directed to –

The South African Human Rights Commission

Physical address:
3 Braampark Forum
33 Hoofd Street
Braamfontein
2017



Telephone: 011 877 3600

Website: www.sahrc.org.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.



PN Abelheim
CEO

28 June 2021

1.8 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:

☐

Printed copy of record*

☐

Printed copy of information
derived from record*

☐

Copy in computer readable
form* (CD)

<p>* 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)</p>	<p>YES</p>	<p>NO</p>
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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
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 of 20.....

.....

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

1.9 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.	

1.10 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

1.11 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