



Access to Information Manual

01 February 2021



Version Control

Revision	Originator	Date	Reviewer	Date
06	Group Compliance Officer	15/12/2020	Group Legal Officer	01 Feb 2021

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Access to Information Manual

As required by Section 51 of the Promotion to Access of Information Act No 2 of 2000 ("PAIA")

Thorburn Security Solutions (Pty) Ltd.
("Thorburn")

1. Introduction

The object of PAIA is to give you access to the records of Thorburn under certain circumstances. PAIA seeks to promote a society in which you have access to information to enable you to exercise and protect your rights, and to promote a culture of transparency and accountability.

Section 51 of PAIA requires all private bodies to compile a manual containing various information including Thorburn's details, a description of the records of Thorburn, as well as the means by which a record may be accessed.

Thorburn is a private body and therefore this manual has been compiled in terms of and in order to comply with Section 51 of PAIA.

2. Company Details

Thorburn's details are as follows:

Registration Number	2016/224394/07
Postal Address	Private Bag 52660, Saxonwold 2132, Johannesburg, South Africa
Physical Address	Tsebo House, 7 Arnold Road, Rosebank, Johannesburg, 2196
Telephone Number	(011) 441 5300
General contact e-mail address for Thorburn	PAIA@tsebo.com
Website	www.thorburn.co.za

3. Human Rights Commission's PAIA Guide

In Terms of Section 10 of PAIA, the South African Human Rights Commission ("SAHRC") is required to compile a guide, in each official language, containing information for any person who wishes to exercise any right contemplated in PAIA.

The abovementioned guide is available on their website, www.sahrc.org.za.

4. Records of Thorburn

A description of the records held by Thorburn, as required by section 51(1)(e) of PAIA, is set out in the Description of Records Table which is attached to this manual as Annexure A.

5. Request for Access to a Record

In order to comply with our obligations in terms of PAIA Thorburn has authorised and designated the **Data Protection Office** (PAIA@tsebo.com) to deal with all matters relating to PAIA.

In order to request access to a record please complete the **Request for Access Form** which is available [here](#) and submit it to Thorburn at its postal address or PAIA e-mail at PAIA@tsebo.com.

6. Information available in terms of other legislation

Thorburn holds information in accordance with the following legislation, but is not limited to:

- Basic Conditions of Employment No. 75 of 1997
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Competition Act No. 89 of 1998
- Credit Agreements Act No. 75 of 1980
- Debtor Collectors Act No. 114 of 1998
- Electronic Communications and Transactions Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Firearms Control Act No. 60 of 2000
- Income Tax Act No. 95 of 1967
- Labour Relations Act No. 66 of 1995
- Occupational Health & Safety Act No. 85 of 1993
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act No. 97 of 1998
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

7. Access to Records

If your request for access to records of Thorburn is approved, access will be provided in the form as Thorburn reasonably determines, unless you have requested access in a specific form.

8. Request Procedure

The purpose of this section is to provide you with guidelines to follow to facilitate a request for access to records held. You must comply with all the procedural requirements contained in PAIA to request for access to a record.

It is important to note that an application for access to information can be refused if the application does not comply with the procedural requirements as stated above. In addition, the successful completion and submission of an Access Request Form does not automatically allow you access to the requested record.

You must complete the **Request for Access Form**, and submit same as well as payment of a request fee and a deposit, if applicable, to the Data Protection Information Officer at the postal or email address as stated above.

Completion of the Request for Access Form must follow the instructions listed below:

- The Request for Access Form must be completed in the English Language.
- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state "N/A" in response to that question.
- If there is nothing to disclose in reply to a particular question, state "nil" in response to that question.
- If there is insufficient space on a printed form in which to answer a question, additional information may be provided on an additional folio.
- When the use of an additional folio is used, precede each answer thereon with the title applicable to that question.
- All additional folios used and attached to the Request for Access Form must be signed by the requestor.

Further to the completion of all fields in the Request for Access Form, please ensure that you provide us with the following information:

- A copy of your valid South African ID document or card.
- A copy of the power of attorney (if applicable).
- Details of how the information requested must be provided to you if the request is granted.
- Your contact details.

Once the completed prescribed form is received you will be requested to deposit a request fee of R50, the account details will be provided in our communication to you. Once proof of payment is received, the request will be processed.

9. Timelines for consideration of your request

Thorburn will respond within 30 days of the receipt of all the necessary information. Thorburn may extend the period of 30 days once for a further period of not more than 30 days, if:

- The request is for a large number of records or requires a search through a large number of records and compliance with the original period would unreasonably interfere with the activities of Thorburn.
- The request requires a search for records in, or collection thereof from, an office of Thorburn not situated in the same town or city as the office of the head that cannot reasonably be completed within the original period.
- Consultation among regions and divisions of Thorburn or with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original period.

If a period is extended, Thorburn must, as soon as reasonably possible, but in any event within 30 days, after the request is received, notify the requester of that extension, the period of the extension and the reasons for the extension. And notify the requester that they may lodge an application with a court against the extension, and the procedure (including the period) for lodging the application.

10. Decision Regarding Request and Records Not Found

PAIA provides for numerous grounds upon which Thorburn may refuse to grant you access to a record of Thorburn. These grounds for refusal are to protect:

- The privacy of another person
- Commercial information of another company
- Confidential information of another person
- The safety of individuals and property
- Records privileged from operations in legal proceedings

You will be notified in writing whether your request has been approved or denied within 30 calendar days after receipt by Thorburn of the completed **Request for Access Form**. Should any record of Thorburn requested by you not be found or not exist, Thorburn will, by way of affidavit, notify you that it is not possible to give access to that particular record.

11. Remedies Available on Refusal of Access

Thorburn does not have internal appeal procedures. As such, the decision made by the Data Protection Information Officer is final, and you will have to exercise external remedies at your disposal if the request for information is refused and are not satisfied with the answer supplied by the Data Protection Office.

Subject to the provisions of the PAIA, if you or a third party are dissatisfied with the Data Protection Information Officer's refusal to disclose information, may within 180 days of notification of the decision, apply to a Court for relief.

Annexure A - Description of Records Table

Categories of Records on Each Subject	Form Held	Availability
1. Company Secretarial Records		
Company Incorporation Documents	Electronic and physical	Automatically available
Names of Directors	Electronic and physical	Automatically available on company website www.thorburn.co.za
Salaries of Directors	Electronic and physical	Not automatically available
2. Financial Records of Thorburn		
Financial statements	Electronic and physical	Yes, in accordance with the Companies Act
Documents relating to taxation	Physical	Not automatically available
Financial Agreements	Physical	Not automatically available
Banking Details	Electronic and physical	Automatically available.
3. Insurance of Company		
Insurance Policies held by Thorburn	Physical	Not automatically available
4. Employees		
List of Employees	Electronic and physical	Not automatically available
Personal information of employees	Electronic and physical	Not automatically available
Employee contracts of employment	Electronic and physical	Not automatically available
Pension Funds & Provident Fund	Electronic and physical	Not automatically available
Salaries of Employees	Electronic and physical	Not automatically available
Leave records	Physical	Not automatically available
5. Company Policies and Directives		
Internal relating to employees and Thorburn	Electronic and physical	Not automatically available
External relating to clients and other third parties	Electronic and physical	Automatically available
6. Agreements or Contracts		
Standard Agreements	Physical	Not automatically available
Contracts concluded with customers	Physical	Not automatically available
Third party contracts (such as Agreements etc.)	Physical	Not automatically available
Supplier contracts	Physical	Not automatically available

Categories of Records on Each Subject	Form Held	Availability
7. Regulatory		
Permits, Licences or Authorities	Physical	Not automatically available
8. Published Information		
External Newsletters and Circulars	Electronic and physical	Automatically available
Internal Newsletters and Circulars	Electronic and physical	Not automatically available
Information on Thorburn published by third parties	Electronic and/or physical	Not automatically available
9. Customer Information		
Customer Details	Electronic and physical	Not automatically available
Contact details of individuals within customers	Electronic and physical	Not automatically available
Communications with customers	Electronic and physical	Not automatically available
10. Reference Materials		
Newsletters and journals articles	Electronic and physical	Not automatically available
Newspaper articles	Physical	Not automatically available
Magazines	Physical	Not automatically available
Newspaper articles	Physical	Not automatically available
11. Physical security		
Internal security services and firearms	Electronic and physical	Not automatically available
12. Occupational Health and Safety		
Construction administration and safety	Electronic and physical	Not automatically available
Elevators, escalators and passenger conveyors, lifting machinery,	Electronic and physical	Not automatically available
Electrical installations	Electronic and physical	Not automatically available
Fire equipment	Electronic and physical	Not automatically available
Noise	Electronic and physical	Not automatically available

Annexure B – Fee Schedule

Fee Schedule

Fees for Reproduction

For every photocopy of an A4 page or part thereof	R1.80
For every printed copy of an A4 page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer readable form on stiffy disc	R7.50
For a copy in a computer-readable form on compact disc	R70.00
For a transcription of visual images per A4 page or part thereof	R40.00
For a copy of visual images	R60.00
For a transcription of an audio record per A4 page or part thereof	R20.00
For a copy of an audio record	R30.00

Request Fee

For a person requesting access to information other than a personal requester i.e. a requester seeking access to a record containing personal information about the requester.	R50.00
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Search Fee

Per hour or part thereof required searching for and preparing the record for disclosure.	R30.00
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Deposit

A deposit of one third of the access fee is payable as a deposit if the search for a record requires more than six hours.