



PAIA MANUAL

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

*Applicable to Thorburn Security Solutions division, joint ventures, suppliers, directors, and
employees of Thorburn*

IMS/MAN05/TSS

16 July 2025



Version Control

Revision	Originator	Date	Reviewer	Date
03	National Compliance Manager	01/02/2014	Group Compliance Officer	01/02/2014
04	National Compliance Manager	01/07/2018	Group Compliance Officer	01/07/2018
05	National Compliance Manager	01/10/2018	Group Compliance Officer	15/11/2018
06	Group Compliance Officer	15/12/2020	Group Legal Officer	11/05/2021
07	Group Compliance Officer	30/06/2025	Group Legal Officer	16/07/2025

Document Approvers

Name	Role	Preparer / Reviewer / Approver
Victoria Naicker	Group Compliance Officer	Preparer
Justine Densem	Group Legal Officer	Reviewer
Stephan Botha	CEO	Approver

Contents

1.	List of acronyms and abbreviations.....	4
2.	Introduction.....	4
3.	Purpose of the PAIA manual	4
4.	Key contact details for access to information of Tsebo.....	5
5.	Guide on how to use PAIA and how to obtain access to the guide	6
6.	Records of Tsebo.....	7
7.	Information available in terms of other legislation	8
8.	Processing of Personal Information	9
9.	Availability of the Manual.....	11
10.	Timelines for consideration of your request.....	11
11.	Decision Regarding Request and Records Not Found	12
12.	Remedies Available on Refusal of Access	12
13.	Updating of the Manual	12

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

1. List of acronyms and abbreviations

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

2. Introduction

The object of PAIA is to give you access to the records of Tsebo 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 Tsebo's details, a description of the records of Tsebo, as well as the means by which a record may be accessed.

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

3. Purpose of the 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 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 Tsebo

4.1 Tsebo's Head Office details are as follows:

Registration Number	2007/027681/07
Postal Address	Private Bag 52660, Saxonwold 2196, Johannesburg, South Africa
Physical Address	Tsebo Office Park, Block A, 85 Protea Road, Chislehurst, Sandton, Johannesburg, 2196
Telephone Number	(011) 441 5300
General contact e-mail address for Tsebo	info@tsebo.com
Website	www.thorburn.co.za

4.2 Chief Information Officer

Name: Timothy Walters

Tel: (011) 441 5300

Email: POPI@tsebo.com

4.3 Deputy Information Officer

Name: Justine Densem

Tel: (011) 441 5300

Email: POPI@tsebo.com

4.4 Access to information general contacts

Email: PAIA@tsebo.com

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 postal and street address, phone and fax number and, if available, electronic mail address of -

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

5.3.3 the manner and form of a request for -

5.3.3.1. access to a record of a public body contemplated in section 11; and

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

5.3.4. the assistance available from the IO of a public 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 Information Officer;

5.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

5.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours – IsiZulu and Afrikaans.

6. Records of Tsebo

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 below:

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.tsebo.com
Salaries of Directors	Electronic and physical	Not automatically available
2. Financial Records of TseboFS		
Financial statements	Electronic and physical	Yes, in accordance with the Companies Act
Documents relating to taxation of Tsebo	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 Tsebo	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 Tsebo	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

7. Information available in terms of other legislation

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

Category of Records	Applicable Legislation
Company registration documents, MOI, board resolutions	Companies Act No. 71 of 2008
Annual returns, financial statements, shareholder registers	Companies Act No. 71 of 2008
Employment contracts, payroll, leave records	Basic Conditions of Employment Act No. 75 of 1997
Employment equity reports, demographic profiles	Employment Equity Act No. 55 of 1998
Skills development plans and training records	Skills Development Act No. 97 of 1998; Skills Development Levies Act No. 9 of 1999
UIF contribution records	Unemployment Insurance Act No. 63 of 2001
Tax returns, VAT records, PAYE, IRP5s	Income Tax Act No. 95 of 1967; Value Added Tax Act No. 89 of 1991
Compensation for injury claims and related reports	Compensation for Occupational Injuries and Diseases Act No. 130 of 1993
Health and safety incident reports, risk assessments	Occupational Health and Safety Act No. 85 of 1993
Disciplinary records, grievance procedures, CCMA matters	Labour Relations Act No. 66 of 1995
Supplier contracts, tenders, procurement records	Competition Act No. 89 of 1998; Companies Act No. 71 of 2008
POPIA compliance framework, consent forms, data subject requests	Protection of Personal Information Act No. 4 of 2013 (POPIA)
PAIA Manual and access request records	Promotion of Access to Information Act No. 2 of 2000 (PAIA)
ICT and cybersecurity policies, email usage logs	Electronic Communications and Transactions Act No. 25 of 2002
Credit agreements (where applicable), client credit vetting	Credit Agreements Act No. 75 of 1980
Debt recovery records	Debt Collectors Act No. 114 of 1998
Firearm licensing and control registers (Thorburn Security Solutions, a division of Tsebo)	Firearms Control Act No. 60 of 2000
B-BBEE compliance documentation	Broad-Based Black Economic Empowerment Act No. 53 of 2003
Environmental and sustainability reports	National Environmental Management Act No. 107 of 1998

8. Processing of Personal Information

8.1 Purpose of Processing Personal Information

Thorburn processes Personal Information in the ordinary course of pursuing its business objectives and to comply with applicable legislation, industry standards, and internal protocols. Personal Information is processed for purposes that include, but are not limited to, the following: Compliance with legal obligations and internal procedures, including POPIA, PAIA, tax laws, employment laws, procurement regulations, and any other applicable legislation.

- Procurement and supply chain management, including supplier due diligence, onboarding, evaluation, and contract management.
- Managing employee relationships, including recruitment, payroll, benefits, training, and performance management.
- Protecting legitimate interests of Thorburn, including the detection and prevention of fraud, bribery, and corruption.
- Verification of personal credentials, including credit records, criminal history, civil judgments, and qualification verification, where relevant.
- Responding to data subject enquiries and service-related requests, and maintaining general business communications.
- Provision of information relating to Thorburn, its directors, employees, goods, services, and ad hoc business updates.
- Conducting statistical and analytical exercises, including testing, data analytics, research, service delivery reviews, and product development or enhancement.
- Managing internal business operations, including finance-related functions such as payments, deductions, billing, reporting, and reconciliations.
- Ensuring the security, safety, and operational integrity of our premises, employees, contractors, and clients (e.g. through CCTV, access control, risk logs).
- Delivery of legal and compliance services, including contract review, legal risk assessments, investigations, and regulatory reporting.

8.2 Description of the subjects on which Tsebo holds records and categories of records held on each subject by Tsebo

Thorburn holds records across various functional and operational areas in support of its legal obligations, business operations, and governance requirements. The table below outlines the key subjects on which records are maintained, along with the categories of records held under each subject:

Subjects on which Thorburn holds records	Typical categories of records held

Corporate Governance & Strategy	Memorandum of Incorporation (MOI); Board & Committee minutes; Board packs; Strategic plans; Policies & charters; Delegations of authority
Finance	Annual financial statements; Management accounts; Budgets & forecasts; Tax returns (VAT, PAYE, Income Tax); Bank mandates; Investment records; Asset registers
Supply Chain Management / Procurement	Approved supplier lists; Tender/Bid documents; Contracts & service-level agreements; Purchase orders; Goods received notes; B-BBEE certificates
Human Resources (HR)	HR policies & procedures; Organograms; Advertised posts & recruitment files; Employment contracts; Leave & payroll records; Training & development plans; Workplace Skills Plans; Employment Equity reports; Disciplinary & grievance files
Operations	Operational manuals & SOPs; Client contracts; Job cards & work orders; Service quality audits; Equipment maintenance logs
Quality, Health, Safety & Environment (QHSE)	OHS risk assessments; Incident & injury reports (COIDA); Safety committee minutes; Environmental impact assessments; Waste-management logs, ISO and other quality management system (QMS) documentation; Internal and external audit reports; Non-conformance reports; Corrective and preventive action plans
Legal & Compliance	Contract register; Litigation files; Compliance risk registers; POPIA & PAIA registers; Anti-bribery / corruption due-diligence records; Licensing & permit documentation
Information Technology (IT)	IT policies & procedures; User access logs; Cyber-security incident registers; System architecture diagrams; Software licences
Marketing & Corporate Communications	Brand guidelines; Marketing strategies; Campaign materials; Media releases; Social-media archives
Risk Management & Insurance	Enterprise Risk Management (ERM) framework; Risk assessments; Insurance policies & schedules; Claims documentation
Quality & Continuous Improvement	Internal audit reports; ISO / SABS certification records; Client satisfaction surveys; Corrective-action plans

8.3 Recipients (or Categories of Recipients) to whom Personal Information may be Supplied

Category of Personal Information	Recipients / Categories of Recipients
Identity numbers & criminal-record data	South African Police Service (SAPS) or other vetting agencies
Qualifications & professional memberships	South African Qualifications Authority (SAQA) and accredited verification bodies
Credit & payment history	Registered credit bureaus
Tax-related information	South African Revenue Service (SARS)

Payroll & benefits data	Banks, pension / provident fund administrators, medical-aid schemes
Incident / injury records	Department of Employment & Labour; Compensation Commissioner
Client-service performance data	Contracting clients (per service agreements)

8.4 Planned Transborder Flows of Personal Information

a) Certain cloud-based systems used by Thorburn (e.g. Microsoft 365, SAP SuccessFactors) store or back-up data on servers located in the European Union and the United Kingdom. These jurisdictions provide protection levels comparable to POPIA, and cross-border data-transfer agreements incorporating the European Commission Standard Contractual Clauses are in place. The categories of data stored include employee HR records, email content, and client contact information.

8.5 Information-Security Measures

b) Thorburn implements layered safeguards to ensure confidentiality, integrity, and availability of personal information, including:

- ISO 27001-aligned Information-Security Management System (ISMS)
- Role-based access controls
- Multi-factor authentication
- Data encryption (at rest and in transit)
- Firewalls, anti-virus, and anti-malware solutions
- Regular vulnerability assessments & penetration testing
- Secure off-site back-ups and disaster-recovery plans
- Staff training on cyber-security and POPIA awareness
- Formal incident-response and data-breach notification procedures

9. Availability of the Manual

9.1 A copy of this Manual is available at: <https://www.tsebo.com> (Regulatory Information section).

9.2 It may be inspected, free of charge, during normal business hours at the Tsebo head office; Tsebo Office Park, Block B on 85 Protea Road, Chislehurst, Sandton, 2196

9.3 An electronic or printed copy will be supplied to any person on written request to the Information Officer and upon payment of the prescribed fee (see Annexure B to the PAIA Regulations).

9.4 A copy will be supplied to the Information Regulator upon request.

9.5 As per Annexure B of the Regulations, an A4-size photocopy fee is payable for each page reproduced.

10. Timelines for consideration of your request

Tsebo will respond within 30 days of the receipt of all the necessary information. Tsebo 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 Tsebo.
- The request requires a search for records in, or collection thereof from, an office of Tsebo 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 divisions of Tsebo 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.

11. Decision Regarding Request and Records Not Found

PAIA provides for numerous grounds upon which Tsebo may refuse to grant you access to a record of Tsebo. 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 Tsebo of the completed **Request for Access Form**. Should any record of Tsebo requested by you not be found or not exist, Tsebo will, by way of affidavit, notify you that it is not possible to give access to that particular record.

12. 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.

13. Updating of the Manual

The head of Thorburn will on a regular basis update this manual.

Issued by:



Stephan Botha

Chief Executive Officer