

PAIA MANUAL

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

Compiled: 08/12/2022
Revised: 12/08/2024

1. DEFINITIONS AND ABBREVIATIONS

Word / Phrase / Abbreviation	Definition
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
POPIA	Protection of Personal Information Act, No 4 of 2013
PAIA	Promotion of Access to Information Act, No 2 of 2000
Regulator	Information Regulator
Republic	Republic of South Africa

2. INTRODUCTION

Rectron is a dynamic and innovative South African ICT company offering software, networking, data centre solutions, surveillance, data storage and cloud computing. Our services comprise of sales, distribution, technical support, assembly, repairs and financing for resellers, retailers, ISPs and end-customers.

3. PURPOSE OF PAIA MANUAL

The Rectron Promotion of Access to Information Act Manual ("PAIA Manual") is published in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA") and section 23-25 of the Protection of Personal Information Act, 4 of 2014 ("POPIA").

PAIA gives effect to the provisions of Section 32 of the Constitution, which provides for the right of access to information. This is information held by the State but also information held by any other person. A person that is entitled to exercise a right or who needs information for the protection of any right, is entitled to access that information, subject to certain restraints.

Section 51 of PAIA creates a legal right to access records (as defined in section 1 of PAIA) of a private body (both natural and juristic), however this right may be negated in circumstances as set out under Chapter 4 of Part 3 of PAIA. In addition, in compliance with POPIA a responsible party who processes personal information must notify the person to whom personal information relates ("Data Subject") of the manner in which the Data Subject can access their personal information held by the responsible Party.

This PAIA Manual is useful for the public to:

- check the categories of records held by Rectron which are available without a person having to submit a formal PAIA request;
- have a sufficient understanding of how to make a request for access to a record of Rectron, by providing a description of the subjects on which Rectron holds records and the categories of records held on each subject;
- know the description of the records of Rectron which are available in accordance with any other legislation;
- 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;

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

4. KEY CONTACT DETAILS

Information Officer	
Chief Executive Officer and Information Officer	Mr Spencer Chen
Deputy Information Officers	
Chief Financial Officer	Mr Christiaan Engelbrecht
Chief of People	Ms Kutlwano Rawana
Chief Operations Officer	Mr Martin Roets
Chief Products Officer	Mr Matthew Hall

4.1. Access to information contact information

Tel:	+27 (0)11 203 1000 (switchboard)
Email:	compliance@rectron.co.za
Website:	https://www.rectron.co.za
Head Office:	
Postal Address	No. 152 15th Road, Randjespark, Midrand, 1685, South Africa
Physical Address:	P.O Box 76494, Wendywood, 2144, South Africa

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

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.

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

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.

The Guide can also be obtained upon request to the Information Officer; from the website of the Regulator (<https://www.justice.gov.za/inforeg/>), and an English copy of the Guide is also available for public inspection during normal office hours.

6. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Information that is obtainable via the Rectron website do need not be formally requested in terms of this manual.

Such records may include:

- Annual Reports
- Privacy Notices
- Disclaimers
- Publications
- Press releases
- Brochures and various other marketing and promotional material
- Rectron contact information

7. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION (SECTION 51(1)(D))

The following legislation creates the obligation to keep certain records:

- Basic conditions of Employment No. 75 of 1997
- Broad Based Black Economic Empowerment Act No. 53 of 2003
- Companies Act No. 71 of 2008
- Consumer Protection Act No. 68 of 2008
- Copyright Act No.98 of 1978
- Electronic Communication and Transaction Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Income Tax Act No. 95 of 1967
- Insolvency Act No. 24 of 1936
- Labour Relations Act No. 66 of 1955
- National Credit Act No. 34 of 2005
- National Environmental Management: Waste Act 59 of 2008
- Occupational Health and Safety Act No. 85 of 1993
- Skills Development Act No. 97 of 1998
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

Such records will be made available to only those individuals/entities authorised to request access to such records in terms of the particular legislation. Any other persons must follow the request for access of records procedure as outlined in this Manual.

8. DESCRIPTION OF THE SUBJECTS ON WHICH RECTRON HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

For requests to records described below, please complete and submit Form 02: Request for Access to Record included in this manual.

Subjects on which Rectron holds records	Categories of records
Companies Act Records	<ul style="list-style-type: none"> • Broad-Based Black Economic Empowerment Verification Certificate • Codes of Conduct • Documents of Incorporation • Legal Compliance Records • Licenses of Copyrights • Memorandum of Incorporation • Minutes of Board of Directors Meetings • Policies • Records relating to the appointment of directors/ auditors/ secretary/ public office and other officers
Human Resources	<ul style="list-style-type: none"> • Attendance Registers • Disciplinary Code • Disciplinary Records • Employment Contracts • Employment Equity Plan • Leave Records • Records containing all employees' names and occupation • Salary Records • Sector Education and Training Authority Records • Training Manuals • Training Records
Information Technology Records	<ul style="list-style-type: none"> • Incidents and Service Requests • Incident Reports • Asset register and custodian information • System event logs • System performance logs • Operations Reports • Service Level Agreements • ICT Policies and Procedures • Network documentation

Subjects on which Rectron holds records	Categories of records
Financial	<ul style="list-style-type: none"> • Accounting Records • Annual Financial Statements • Asset Register • Auditors' Report • Bank Statements • Banking Records • Detail of Auditors • Electronic Banking Records • Invoices • Paid Cheques • Rental Agreements • Tax Returns
Income Tax Records	<ul style="list-style-type: none"> • Documents issued to employees for income tax purposes • PAYE Records • Records of payments made to SARS on behalf of employees • Value Added Tax Clearance Certificate • All other statutory compliances • Value Added Tax • Skills Development Levies • Unemployment Insurance Fund
Customer Records	<ul style="list-style-type: none"> • Dealer Registration Records, Service Agreements and related correspondence. • Dealer Account Statements • Dealer Order Information
Supplier Records	<ul style="list-style-type: none"> • The name of the supplier • The address of the supplier • A description of the goods • The quantity or volume of the goods • Proof of data of payment
Insurance Records	<ul style="list-style-type: none"> • Professional Indemnity Insurance • Directors and Officers Insurance • General Insurance
Immovable and Movable Property Records	<ul style="list-style-type: none"> • Agreements for the lease of movable property • Agreements for the lease or sale of land and/or other immovable property • Other agreements for the purchase, ordinary sale, conditional sale, or hire of assets

Subjects on which Rectron holds records	Categories of records
Contracts and Agreements Records	<ul style="list-style-type: none"> • Agency, management and distribution agreements • Agreements for the trading activities of the business

9. PROCESSING OF PERSONAL INFORMATION

9.1. Purpose of Processing Personal Information

We generally collect and process personal information for various purposes, including:

- goods or services purposes – such as collecting orders or requests for and providing Rectron goods or services;
- marketing purposes – such as pursuing lawful related marketing activities;
- business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- legal purposes – such as handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the Rectron website(s);
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

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

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information.

Categories of Data Subjects	Personal Information that may be processed
Customers	Name, address, registration numbers or identity numbers, contact numbers, director's information, bank details, VAT numbers.
Service Providers	Company name, representative name(s) and contact information, registration number, VAT number, address, trade secrets and bank details.

Categories of Data Subjects	Personal Information that may be processed
Employees and job applicants	Name, address, contact information, qualifications, gender and race, curriculum vitae.
Visitors	Name, company name, contact information, CCTV footage.

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

We do not share personal information with third parties unless it directly relates to the purpose for collecting and processing the information in the aforementioned clause 9.1.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Name, company name, contact details, e-mail address, physical address, <i>for goods delivery</i>	Goods Delivery Agents (Couriers)
Name, e-mail address, <i>for marketing and service communications</i>	Our divisions, affiliates and/or partners
Name, e-mail address, <i>for after-sales product support and warranty registrations</i>	Suppliers or OEMs
Name, e-mail address, company address, purchase information, <i>for rebate rewards and sales reporting</i>	Suppliers or OEMs
Identity number and names, <i>for fraud prevention purposes</i>	Fraud prevention services and law enforcement authorities
Name and identity number, qualifications, <i>for criminal and qualification verifications</i>	Accredited Screening and Vetting Company
Credit and payment history, <i>for credit information</i>	Credit Bureaus

9.4. Planned transborder flows of personal information

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected.

- Rectron makes use of various cloud service providers, both within and outside of the country. A number of these service providers are appointed service providers by OEMs and their processing mandatory to deliver certain aspects of our goods and services.

- OEMs located in various countries may require us to report limited personal information, relating to their goods and services, to their offices in the country of origin or regional offices. Rectron will only share the minimum required information for the purpose for which is shared.

No special information or children's information is transferred outside of the border of South Africa.

9.5. General description of Information Security Measures

Rectron has implemented good governance processes and procedures including implementing an Information Security Management System aligned to ISO/IEC 27001 and its related ISO/IEC 27002 guidelines.

Such measures include, but is not limited to:

- Information Security policies;
- Access and Network access controls;
- Management of Privileged Access controls;
- Anti-malware controls;
- Encryption controls;
- Information identification and classification controls;
- Mobile device and remote access controls;
- Incident Management policies and procedures;
- Data Breach reporting and notification procedures;
- Backup and Disaster Recovery plans;
- Capacity management controls;
- Change control procedures; as well as
- numerous other information and cyber-security measures.

Rectron has also implemented robust data privacy procedures including, but not limited to, handling of data subject requests, complaints, data breaches and related notifications, managing Operator security and agreements, and transborder information flow, among others.

We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or willful manipulation, loss or destruction.

10. AVAILABILITY OF THE MANUAL

A copy of this Manual is available on www.rectron.co.za, on request at the head office of Rectron for public inspection during normal business hours, to any person upon request and upon the payment of a reasonable prescribed fee; and to the Information Regulator upon request.

11. INFORMATION REGULATOR

The Information Regulator (South Africa) is an independent body established in terms of section 39 of the Protection of Personal Information Act 4 of 2013. It is subject only to the law and the constitution and it is accountable to the national assembly.

The Information Regulator is, among others, empowered to monitor and enforce compliance by public and private bodies with the provisions of the Promotion of Access to Information Act, 2000 (act 2 of 2000), and the Protection of Personal Information Act, 2013 (act 4 of 2013).

The public can reach the Information Regulator is as follows:

The Information Regulator (South Africa)	P.O. Box 31533
JD House	Braamfontein
27 Stiemens Street	Johannesburg, 2017
Braamfontein	
Johannesburg, 2001	

General enquiries:	infoereg@justice.gov.za
Complaints:	Complaints.IR@justice.gov.za
Website:	https://www.justice.gov.za/infoereg/index.html

12. PRESCRIBED FEES

The following fees are prescribed by Annexure B of the PAIA Regulations (GG 45057, GoN 757, 27 Aug 2021), and payable on reproduction of a record if the request is granted as contemplated in Regulation 4, 5, or 7.

If the search exceeds 6 hours, a 33% deposit is payable and access to records may be withheld until the deposit is paid by the requester.

The request fee payable by every request	R140.00
For every B&W photocopy of an A4-size page	R2.00 per page or part thereof
For every printed copy of an A4-size page held on a computer or in electronic or machine-readable form	R2.00 per page or part thereof
For a copy in a computer-readable form on	
Compact disc	R 40.00 (if provided by requestor) R 60.00 (if provided by company)
USB thumb drive	R 40.00 (to be provided by requestor)
For a transcription of visual images per A4-size page	Actual costs (service to be outsourced. Will depend on quotation from the transcription service provider)
Copy of visual images	
Transcription of an audio records, per A4-size page	R24.00

Copy of an audio record	
Compact disc	R 40.00 (if provided by requestor) R 60.00 (if provided by company)
USB thumb drive	R 40.00 (to be provided by requestor)
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R145.00 (to not exceed a total cost of R435.00)
Deposit: (If search exceeds 6 hours)	1/3 of the amount per request calculated in terms of the above.
Postage, e-mail or any other electronic transfer:	Actual costs, if any

Requesters who are also Data Subjects may request whether Rectron holds any of their personal information free of charge and without needing to submit a formal request in terms of PAIA.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

[GG 45057, GoN 757, 27 Aug 2021]

Note:

1. Proof of identity must be attached.
2. If requests are made on behalf of another person, proof of such authorization, must be attached to this form.

To: The Information Officer
 Rectron (Pty) Ltd
 No. 152 15th Road, Randjespark, Midrand, 1685, South Africa
 P.O Box 76494, Wendywood, 2144, South Africa

E-mail address: compliance@rectron.co.za

Please mark with "X" below:

Request is made in my name.	Request is made on behalf of another person.
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Requester's Personal Information		
Full Names		
Identity number		
Postal Address		
Physical Address		
E-mail Address		
Contact Numbers	Telephone <small>(office hours)</small>	
	Fax	
	Mobile	

Rectron respects your privacy. The Personal Information provided on this form will be used to communicate the outcome of your requests and to provide the record, if access is granted, as per your request.

For further information on how we process personal information, please refer to our Privacy Policy available on <https://www.rectron.co.za>.

Data Subject's Personal Information (when on behalf of another person)	
Full Names of person on whose behalf request is made (when on behalf of another person).	
Capacity in which request is made (when on behalf of another person).	
Identity number	
Postal Address	
Physical Address	
E-mail Address	
Contact Numbers	Telephone (office hours)
	Fax
	Mobile

Particulars of record requested	
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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)	
Description of record or relevant part of the record:	
Reference number, if available:	

Particulars of record requested	
Any further particulars of record:	

Type of Record (Mark with "X" as applicable)	
Record is in printed form.	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.).	
Record consists of recorded words or information which can be reproduced in sound.	
Record is held on a computer or in an electronic, or machine-readable form.	

Form of Access (Mark with "X" as applicable)	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form).	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.).	
Transcription of soundtrack (written or printed document).	
Copy of record on flash drive (including virtual images and soundtracks).	
Copy of record on compact disc drive (including virtual images and soundtracks).	
Copy of record saved on cloud storage server.	

Manner of Access (Mark with "X" as applicable)	
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form).	
Postal services to postal address	
Postal services to street address	
Courier service to street address	

Manner of Access (Mark with "X" as applicable)	
Facsimile of information in written or printed format (including transcriptions).	
E-mail of information (including soundtracks if possible).	
Cloud share/file transfer.	
Note: Records will be made available in the language in which the record is available.	

Particulars of Right to be Exercised or Protected	
If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.	
Indicate which right is to be exercised or protected:	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

Fees
a) A request fee must be paid before the request will be considered. b) You will be notified of the amount of the access fee to be paid. 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.

Exemption from Fees (Mark with "X" as applicable)

I am a single person and my annual income does not exceed R14,712.00	
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I am a married person, or have a life partner, and our combined annual household income does not exceed R 27,192.00	
Any other reason:	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any.

Please indicate your preferred manner of correspondence (mark with "X"):

Postal Address	Facsimile	E-mail

Signed at _____ this _____ day of _____ 20_____.

Signature of Requester or person on whose behalf request is made

You can submit this form via the following means:

- Hand-deliver to our physical address
- Postal delivery to our postal address
- E-mail to compliance@rectron.co.za