



**True Group (Pty) Ltd**  
Reg. No. 2010/019724/07

Tel: +27 (0) 21 565 0000

Unit G5 and G6 Stellenpark  
Business Park, Corner of R44  
and School Street, Stellenbosch,  
7600  
P O Box 12053, Die Boord,  
Stellenbosch, 7613

## ACCESS TO INFORMATION MANUAL

*drafted and implemented in accordance with Section 51 of the Promotion to Access of Information Act 2 of 2000*

|                                       |  |
|---------------------------------------|--|
| Company                               | True Group Proprietary Limited<br>Registration Number: 2010/019724/07<br><br><i>(including all subsidiaries, related and associated companies)</i> |
| Effective Date                        | 01/01/2022   |
| Physical address                      | Unit G5 & G6, Stellenpark Business Park, Cnr R44 & School Street, Stellenbosch 7600  |
| Email address                         | info@truegroup.co.za   |
| Telephone number                      | +27 (0) 21 565 0300  |
| Website                               | www.truegroup.co.za  |
| Details of Information Officer        | Claudette Manuel   |
| Details of Deputy Information Officer | Shannon Vengadajellum  |
| Date approved by Information Officer  | 15 December 2021   |
| Next Manual Review Date               | 15 December 2022   |

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## 1. SCHEDULE

### 1.1 The SAHRC's contact details

|                  |  |
|------------------|--|
| Physical address | JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 |
| Postal address   | Private Bag 2700, Houghton, 2041                               |
| Telephone        | +27 (0) 11 877 3600  |
| Fax number       | +27 (0) 11 403-0625  |
| Email address    | paia@sahrc.org.za  |
| Website          | www.sahrc.org.za   |

### 1.2 The Information regulator's contact details

|                  |   |
|------------------|---|
| Physical address | JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001                      |
| Postal address   | PO Box 3153, Braamfontein, Johannesburg, 2017                                       |
| Telephone        | +27 (0) 10 023 5200   |
| Email address    | inforeg@justice.gov.za  |
| Website          | <a href="https://www.justice.gov.za/inforeg">https://www.justice.gov.za/inforeg</a> |

### 1.3 The records we hold

| Categories of records on each subject                | form held               | availability                |
|--|-------------------------|-----------------------------|
| <b>1.3.1 Secretarial records of the Organisation</b> |                         |                             |
| Company incorporation documents                      | electronic and physical | automatically available     |
| Names of directors                                   | electronic and physical | automatically available     |
| Salaries of directors                                | electronic and physical | not automatically available |
| <b>1.3.2 Financial records of the Organisation</b>   |                         |                             |
| Financial statements                                 | electronic and physical | not automatically available |
| Documents relating to taxation                       | physical                | not automatically available |
| Financial agreements                                 | physical                | not automatically available |



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|       |  |                         |                             |
|-------|--|-------------------------|-----------------------------|
|       | Banking details  | electronic and physical | not automatically available |
| 1.3.3 | Insurance of the Organisation                                |                         |                             |
|       | Insurance policies held by the Organisation                  | physical                | not automatically available |
|       | Register of all immovable property owned by the Organisation | physical                | not automatically available |
| 1.3.4 | 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 and provident fund                             | electronic and physical | not automatically available |
|       | Salaries of employees  | electronic and physical | not automatically available |
|       | Leave records  | physical                | not automatically available |
| 1.3.5 | Policies and directives of the Organisation                  |                         |                             |
|       | Internal relating to employees and the company               | electronic and physical | not automatically available |
|       | External relating to clients and other third parties         | electronic and physical | not automatically available |
| 1.3.6 | Agreements or contracts                                      |                         |                             |
|       | Standard agreements  | physical                | not automatically available |
|       | Contracts concluded with customers                           | physical                | not automatically available |
|       | NDA's  | physical                | not automatically available |
|       | Letters of intent, MOUs                                      | physical                | not automatically available |
|       | Third party contracts (such as JV agreements)                | physical                | not automatically available |
|       | Office management contracts                                  | physical                | not automatically available |
|       | Supplier contracts   | physical                | not automatically available |
| 1.3.7 | Regulatory   |                         |                             |
|       | Licenses or authorities                                      | physical                | not automatically available |
| 1.3.8 | Published Information  |                         |                             |



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|       |   |                              |                             |
|-------|---|------------------------------|-----------------------------|
|       | External newsletters and circulars                    | electronic and physical      | automatically available     |
|       | Internal newsletters and circulars                    | electronic and physical      | not automatically available |
|       | Information on the company published by third parties | electronic and / or physical | not automatically available |
| 1.3.9 | 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 |

## 2. ACCESS TO INFORMATION

- 2.1. This manual ("**Manual**"), which has been drafted in compliance with the Promotion of Access to Information Act 2 of 2000 ("**PAIA**") will help you as a consumer to gain access to information held by the organisation set out in item 1.1 ("**Organisation**").
- 2.2. The Organisation is required in terms of PAIA to make this Manual available to you so that you can see what type of information it holds, as well as how you can request to gain access to it.

## 3. FURTHER GUIDANCE ON HOW YOU CAN GET ACCESS TO INFORMATION

- 3.1. A guide to PAIA ("**Guide**") is available from the South African Human Rights Commission ("**SAHRC**") website, the details of which are set out in item 1.11. The Guide describes, in each of the official languages:
- 3.1.1. What the objectives of PAIA are;
- 3.1.2. The details of each public body (where possible);
- 3.1.3. The process that needs to be followed in order to make a request for information;
- 3.1.4. How to get copies of the Guide at no charge;
- 3.1.5. How to get access to the manual of a private body; and
- 3.1.6. All the remedies available to you in law.
- 3.2. Should you have any queries regarding the Guide, please contact the SAHRC directly using the information set out in item 1.11.

## 4. THE INFORMATION REGULATOR (SOUTH AFRICA)

- 4.1. The information regulator of South Africa ("**Information Regulator**") established in terms of the Promotion of Access to Information Act 4 of 2013 ("**POPIA**") is set to take over the function of the SAHRC in the near future. You can also contact the Information Regulator for further details. The Information Regulator also regulates the enforcement of POPIA.
- 4.2. The Information Regulator's contact details are set out in item 1.12.

## 5. THE RECORDS HELD BY THE ORGANISATION

A description of the records held by the Organisation, as required by section 51(1)(e) of PAIA, is set out in item 1.13.

## 6. HOW YOU CAN REQUEST ACCESS

- 6.1. In order to comply with the Organisation's obligations in terms of PAIA, it has authorised and designated the information officer of the Organisation set out in item 1.8 ("**Information Officer**") to deal with all matters relating to PAIA.



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- 6.2. In order to request access to a record held by the Organisation, please complete the “Request for Access Form” (“Request”) which is available at [www.sahrc.org.za](http://www.sahrc.org.za) and submit it to the Organisation at its physical address, its fax number, the general contact e-mail address or the Information Officer’s email address set out in items 1.4, 1.7, 1.5 and 1.9, respectively.

## **7. INFORMATION WE HOLD TO COMPLY WITH THE LAW**

- 7.1. The Organisation holds information in accordance with the following legislation:
- 7.1.1. Basic Conditions of Employment Act 75 of 1997;
  - 7.1.2. Companies Act 71 of 2008;
  - 7.1.3. Consumer Protection Act 68 of 2008;
  - 7.1.4. Electronic Communications and Transactions Act 25 of 2002;
  - 7.1.5. Employment Equity Act 55 of 1998;
  - 7.1.6. Income Tax Act 95 of 1967;
  - 7.1.7. Labour Relations Act 66 of 1995;
  - 7.1.8. POPIA;
  - 7.1.9. Value Added Tax Act 89 of 1991;
  - 7.1.10. Estate Agencies Affairs Act 112 of 1976; and
  - 7.1.11. Schools Act 84 of 1996.

## **8. OTHER INFORMATION AS MAY BE PRESCRIBED**

The Minister of Justice and Constitutional Development has not made any regulations in terms of section 51(f) of PAIA.

## **9. REASONS FOR ACCESS REFUSAL**

- 9.1. In terms of PAIA, the Organisation may refuse you access to certain documents on prescribed grounds. The grounds for refusal are to protect:
- 9.1.1. the privacy of another person;
  - 9.1.2. commercial information of another company;
  - 9.1.3. confidential information of another person;
  - 9.1.4. the safety of individuals and property;
  - 9.1.5. records privileged from production in legal proceedings; and
  - 9.1.6. research information.
- 9.2. You will be notified in writing as to whether your request for information has been approved or denied within 30 (Thirty) calendar days after receipt of a completed Request. Should any record of the Organisation requested by you not be found or not exist, the Organisation will, by way of affidavit, notify you that it is not possible to give you access to that particular record.

## **10. IN WHAT FORM WILL ACCESS BE GIVEN**

If your Request is approved, the Organisation will determine how it will provide such access to you, unless you have requested access in a specific form and the Organisation can accommodate this.

## **11. HOW MUCH WILL IT COST YOU**

- 11.1. Section 52(3) of PAIA states that fees payable for access to records are to be prescribed.
- 11.2. The prescribed fees are as set out in the “Fee Schedule” which is also available at [www.sahrc.org.za](http://www.sahrc.org.za).

## **12. PROCESSING PERSONAL INFORMATION**

- 12.1. For purposes of this clause 12, “Processing” and “Personal Information” have the meanings ascribed to them in POPIA.



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- 12.2. The Organisation processes Personal Information about the following types of natural and juristic people:
- 12.2.1. Customers;
  - 12.2.2. Employees and contractors;
  - 12.2.3. Suppliers / vendors;
  - 12.2.4. Debtors; and
  - 12.2.5. Creditors.
- 12.3. The Organisation does not intend to transfer Personal Information outside of South Africa, but it may do so (i) to secure or backup such Personal Information, or (ii) for technical reasons. If Personal Information is transferred offshore, the Organisation will only transfer such Personal Information to other countries who have similar privacy and data protection laws as those in South Africa, as required by the provisions of POPIA.

### **13. HOW PERSONAL INFORMATION IS PROTECTED**

- 13.1. The Organisation is committed to ensuring that Personal Information is secure.
- 13.2. In order to prevent unauthorised access or disclosure to any Personal Information, the Organisation has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information it collects.
- 13.3. The Organisation makes use of secure data transmission and storage technologies to reasonably protect Personal Information from unauthorised disclosure and to maintain the integrity of your Personal Information. The Organisation takes all reasonable technical and organisational measures to ensure the security of Personal Information.