

**WESTCOR SA (PTY) LTD
REGISTRATION NUMBER 2015/201309/07
("The Company" or "Westcor")**

**THE PROMOTION OF ACCESS TO INFORMATION
MANUAL**

Published in terms of Section 51 of the Promotion of
Access to Information Act of 2000

("PAIA Manual")

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1. Introduction

Westcor SA (Pty) Ltd (the “Company”) is an accessory supplier to the Best Retailers in South Africa. We help our Clients create, manage and expand the accessory categories in their businesses. This Manual provides an outline of the records and personal information we keep and explains how to request access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA Act”). It also provides guidance on how to access, or object to, personal information that we keep, or to request correction of personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPI Act”).

This Manual is compiled in terms of the PAIA and POPI Acts. These Acts give effect to everyone’s constitutional rights to privacy and governs the right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights.

If a public body lodges a request for information, the public body must be acting in the public interest. Requests for information shall be made in accordance with the prescribed procedures and at the rates provided. The forms and tariff are dealt with in section 8.

2. Availability of this PAIA Manual

This manual is published on the Company website at www.westcor.co.za or alternatively, a copy can be requested from the Information Officer (see contact details in section 4).

3. Availability of guides to the PAIA and POPI Acts

To obtain guides to the PAIA and POPI Acts or to lodge a query, please contact:

PAIA Act	POPI Act
South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041	The Information Regulator P.O Box 31533, Braamfontein, Johannesburg, 2017
29 Princess of Wales Terrace Corner York & St Andrews Street Parktown Johannesburg 2193	JD House, 27 Stiemens Street Braamfontein Johannesburg 2001
Telephone number: +27 11 484 8300 Email Address: PAIA@sahrc.org.za Website: www.sahrc.org.za	Telephone Number: +27 10 023 5200 Complaints: complaints.IR@justice.gov.za E-mail Address: inforeg@justice.gov.za Website: https://www.justice.gov.za/inforeg/

4. About Westcor

Westcor SA (Pty) Ltd, registration number: 2015/201309/07.

5. Contact Details

Name of Private Body: Westcor SA (Pty) Ltd

Designated Information Officer: The Information Officer

Email address of Information Officer: InformationOfficer@westcor.co.za

Contact Number: 021 443 4340

Postal address: PO Box 155, Green Point, Cape Town, 8005

Street address: Westcor House, 124 Waterkant Street, Green Point, Cape Town, 8005

6. Company records

6.1 Classification grid

Our information is classified as follows:

Classification	Access	Reason
1	May be disclosed	Public record or information that is subject to copyright
2	Limited disclosure	Personal information that belongs to the requester of the information
3	May not be disclosed	Unreasonable disclosure of PI Likely to harm the commercial or financial interests of a Third Party Breach of duty of confidence owed to a Third Party Legally privileged Information requested after commencing criminal or civil proceedings or in pursuance thereof Likely to compromise safety of individuals or property Commercial information of a Private body
4	May not be refused	Disclosure of information in the public interest

Only information requests that are required for the exercise or protection of a legitimate right will be considered. It is the responsibility of the requester to provide sufficient justification to enable the company to identify the right that the requester seeks to protect as well as the reason the requested information is deemed relevant in protecting such a right. All information requests must be made to the Information Officer, who will assess the requests and respond to these requests.

6.2 Company records and availability

Department	Subject	Classification
Human Resources	Employee records	2,3
	Employee contracts	2,3
	Personnel guidelines, policies & procedures	2,3
	Employee medical records	2,3
	Employee disability insurance records	2,3
	Employee provident fund records	2,3
	Payroll records	2,3
	Recruitment records	2,3
	Time & attendance records	2,3
Finance / Compliance & Information Technology	Audited financial statements	3
	Tax records (company & employees)	3
	Asset register	3
	Client & Supplier information	3
	Management accounts	3
	Contract documentation	3
	Banking records	3
	Company policies and procedures	3
	Immovable property records	3
	Statutory records	3
	Intellectual property records	1
	IT infrastructure, processing and development records	3
Merchandising & Operational	Client product listings, pricing & sales performance records	2,3
	Marketing & future product strategies	2,3
	Customer and prospective customer databases, strategies, records & information	2,3
	Supplier/vendors and prospective supplier/vendor databases, strategies, records & information	2,3
	Operational field records	2,3
	Quality records	2,3

7. Processing of personal information

Westcor takes the responsibility to protect the privacy and protection of personal information very seriously. All requests for information will be processed in line with the current South African legislation. Legal requirements will be complied with when processing the relevant personal information.

7.1 Why do we process personal information?

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by our data subjects;
- to maintain client records and to measure our performance at Client premises;
- for recruitment, employment & travel purposes (including reference & credit checks);
- for general administration, financial and tax purposes;
- to communicate with our Clients / Customers via direct marketing, including email, sms, letter, telephone unless indicated otherwise by Clients / Customers;
- for legal or contractual purposes;
- for health and safety purposes;
- to monitor access, security and management of our premises and facilities;
- to transact with our suppliers and business partners;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;

- to perform credit checks and to help us recover debts;
- to carry out analysis and customer profiling; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

7.2 Recipients to whom personal information may be supplied

Information collected in 7.1 may be shared with the following:

- Employees, contractors, agents and temporary staff of Westcor.
- Any firm, organisation or person that Westcor uses to collect payments and recover debts or to provide a service on its behalf.
- Any firm, organisation or person that/who provides Westcor with products or services.
- Any person who Westcor has reason to believe to be a data subject's / consumer's parent, carer or helper where he/she is unable to handle his/her own affairs because of mental incapacity or other similar issues.
- Any payment systems that Westcor uses.
- Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where Westcor has a duty to share information.
- Third parties to whom payments are made on behalf of employees.
- Financial institutions from whom payments are received on behalf of data subjects.

We do not share personal information of any data subject with third parties, unless:

- We are obliged legally to provide such information
- We have sought and received permission from the data subject to share the information
- We are required to provide the information for existing or future legal proceedings
- We are disposing of business interests where we are permitted to transfer our rights under any agreement we have with you to such a business party
- In the prevention of fraud, loss, bribery or corruption
- We have outsourced the processing of personal information on our behalf
- We require the information to improve our product and/or service quality

7.3 Information security measures to protect personal information

We have taken reasonable technical and organisational measures to ensure the security, confidentiality, integrity and availability of the personal information in our and our operators' possession. Operators, in terms of the POPI Act, are third parties that process personal information on our behalf.

On an ongoing basis, we review our technical and operational security measures to protect the personal information that we have against unauthorised access as well as accidental or wilful manipulation, loss or destruction.

We take steps to ensure that our operators that process personal information on our behalf, also apply adequate safeguarding of information provided to them.

7.4 Personal information received from Third Parties

When we receive personal information from a third party on behalf of a data subject, we require confirmation that the Third Party has the written consent from the data subject that they are familiar with this PAIA manual and our Privacy policy and that they have no objection to our processing of the information in accordance with this policy.

This is supported by appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

8. Information requests

8.1 Request format

Requests for access to records in terms of PAIA must substantially correspond with Form C of Annexure B to Government Notice No. R.187 dated 15 February 2002 and should be specific in terms of the record requested. This form is attached to this Manual as Appendix A. Follow these steps:

- Complete the form and address your request to the Information Officer indicated in section 5 either via email or post.
- Provide sufficient detail in the form to allow the Information Officer to identify:
 - The records that are requested
 - The requester of the information and any proof of capacity
 - South African postal address, email address and contact details of the requester of the information
 - The format of the access that is required
 - Whether the requester needs to be informed of the decision in any manner other than written confirmation and if yes, the format of such confirmation required
 - The right that the requester is seeking to exercise or protect in obtaining this information as well as the explanation of the reason that the records required will exercise or protect this right

8.2 Fees

With the exception of personal requests made by the data subject, the following fees will apply to requests for personal information:

- A requester is required to pay the prescribed fee of R50 before a request for access to data will be processed
- Should the preparation of the data required exceed 6 hours, then a deposit may be required of not more than 1/3 of the access fee that would become payable if the request is granted
- A requester may, in terms of the Act, lodge an application with the court against payment of the fees or deposit
- Records may be withheld until the fees have been paid
- Our fee structure is included in Appendix B

9. Remedies

Should our Information Officer grant you access to the records, access must be granted within 30 days of being informed of the decision. The company does not have an internal appeal process regarding data requests and as such, any decision made by the Information Officer or a duly authorised individual is final. In the event that you are dissatisfied with the outcome of the request, you may apply to a court of competent jurisdiction or the Information regulator (refer point 3 for contact details) for relief.

APPENDIX A – Prescribed form

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000))
[Regulation 10]

A. Particulars of private body

The Head/Designated Person: _____

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: _____

E-mail address: _____

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 to 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		Transcription of soundtrack* (written or printed document)	
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 the record*	copy in computer readable form*
* If you requested a copy of the transcription of a record above, do you wish the copy of transcription to be posted to you? Postage is payable.			YES NO

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. 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?

Signed at _____ this _____ day of _____ 20____

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE

APPENDIX B – Prescribed Fees

PRESCRIBED FEES OF THE PROMOTION OF ACCESS TO INFORMATION ACT

The following applies to requests (other than personal requests):

1.1 A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;

1.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);

1.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;

1.4 Records may be withheld until the fees have been paid.

1.5 Payments should be made to Westcor SA (Pty) Ltd

Fees in respect of private bodies.

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.

2. The fees for reproduction referred to in regulation 11(1) are as follows:

	R
(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 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) is 50,00.