

ThoroughTec Simulation (Pty) Ltd

Procedure Manual for Access to Information

(In terms of Section 51 of the Promotion of Access to Information Act)

Date: 04 July 2017

Document No.:33-00124-TT

Revision No.: 0

ThoroughTec Simulation (Pty) Ltd

Reg. No. 2011/010802/07
Tel. +27 (0)31 569 4033 Fax. +27 (0)31 584 6044
info@thoroughtec.com www.thoroughtec.com
24 Spring Grove, Umhlanga Ridge, 4319, South Africa
PO Box 1550, Umhlanga Rocks, 4320, South Africa

Directors:

W.JUSTIN COLLINS B.Mil. B.Soc Sci.(Hons) - CEO
SIYABONGA NHLUMAYO BComm, PGDA, CA (SA)



DOCUMENT APPROVAL		
GENERATION	DESIGNATION	SIGNATURE
Authored By	ThoroughTec EVP Corporate Services	Name: David Waltham Sign: Date:
Approved By	ThoroughTec Chief Executive Officer	Name: W. Justin Collins Sign: Date:
Approved By	ThoroughTec Quality Assurance	Name: Donovan Ramsamy Sign: Date:

DOCUMENT DISTRIBUTION		
COPY	ACCEPTANCE PARTY	DISTRIBUTION
Master	ThoroughTec Configuration Control	Stored at ThoroughTec

DOCUMENT CHANGE RECORD			
DATE	REV	CHANGE SUMMARY	CHANGE NO.
2017/07/04	0	Original document	N/A

Contents

1. Introduction	4
2. Company Profile	4
3. Registration Number	4
4. Registered Office	4
5. Head Office	5
6. Contact Details	5
7. Guidelines for application of the Promotion of Access to Information Act	6
8. Information available in terms of the Companies Act	7
9. Protection of Personal Information Act ("POPI")	7
10. Other Records	8
11. Application for Access to Records	8
12. Fees Chargeable for Access to Records	9
13. Grounds for Refusal of Access to Records	9
14. Applications to Court	9
15. Copies of the Manual	9
ANNEXURE A	10
ANNEXURE B	15

1. Introduction

In terms section 51 of the Act a requester must be given access to any record of a private body if-

- (a) that record is required for the exercise or protection of any rights
- (b) that person complies with the procedural requirements set out in the Act relating to a request for access to that record (see annexure A); and
- (c) access to that record is not refused in terms of any ground for refusal contemplated in chapter 4 of the Act

2. Company Profile

ThoroughTec Simulation (Pty) Ltd which is situated in Durban, Kwa-Zulu Natal is engaged in the design, development, manufacture, distribution and support of technology based simulation training products.

3. Registration Number

The Registration Number of the Company is **2011/010802/07**

4. Registered Office

Registered Office of the Company is:

24 Spring Grove
Umhlanga Ridge
Kwa-Zulu Natal
4319

Postal Address: P. O. Box 1550
Umhlanga Rocks
4320

Telephone Number: (031) 569 4033

Telefax number: (031) 584 6044

5. Head Office

The Head Office of the Company is situated at:

24 Spring Grove
Umhlanga Ridge
Kwa-Zulu Natal
4319

Postal address: P.O. Box 1550
Umhlanga Rocks
4320

Telephone number: (031) 569 4033

Telefax number: (031) 584 6044

Electronic Mail: davidw@thoroughtec.com

Website: www.thoroughtec.com

6. Contact Details

The contact details for the Company are as follows:

Information Officer: Mr. David Waltham

Physical address: 24 Spring Grove
Umhlanga Ridge
Kwa-Zulu Natal
4319

Postal Address: P. O. Box 1550
Umhlanga Rocks
4320

Telephone Number: (031) 569 4033

Telefax Number: (031) 584 6044

Electronic Mail: davidw@thoroughtec.com

7. Guidelines for application of the Promotion of Access to Information Act

A copy of the guidelines setting out the procedure for the obtaining of access to information in terms of the Act may be obtained from:

The South African Human Rights Commission

Postal Address: Private Bag 2700 Houghton 2041.

Telephone Number: (011) 877 3600

Fax Number: (011) 403 0625

Website: www.sahrc.org.za

8. Information available in terms of the Companies Act

Information available to the public in terms of the Companies Act includes the following documents:

- The Certificate of Registration
- The Memorandum and Articles of Association
- The Register of Shareholders
- The Register of Directors

which are kept at the **Registered Office** of the Company at the address referred to in paragraph 4 above.

The Minute Book of the Company is kept at the **Head Office** at the address referred to in paragraph 5 above.

Statutory information relating to the Company may also be obtained from:

The Companies and Intellectual Property Commission (CIPC)

Street Address: 77 Meintjies Street, Sunnyside Pretoria.

Postal Address: P. O. Box 429 Pretoria 0001

Telephone Number: (012) 394 9500

9. Protection of Personal Information Act (“POPI”)

Personal Information, as defined in the Protection of Personal Information Act, No.4 of 2013 (“POPI”), is used in the day to day operational processes and employment processes including but not limited to recruitment, employment contracts, employment equity, medical aid, group life policies, disciplinary actions, performance management, retrenchments, benefits and remuneration, training, SETA records or other employment-related requirements.

The company may also process personal information as part of its standard business operations in concluding agreements, or as and when required under any other laws or regulations.

Personal Information maintained by the Company includes, but is not necessarily limited to the following:

Categories of Data Subjects	Categories of Information Held
A. Customers and Suppliers/Service Providers	Includes company registration details, VAT registration details, BEE certificates, payment details including bank accounts, invoices, contracts/agreements, terms and conditions, addresses, contact details.
B. Directors & Employees	Names, ID numbers, ID documents, addresses, passport details, birth dates, age, race, gender, criminal checks, finger prints, CV's, education history, employment history, banking details, remuneration and

	benefits, shareholding, medical history, spouse and family details, beneficiaries, disability information, income tax numbers, medical aid memberships, provident/pension fund membership and contributions, employee performance, disciplinary actions.
C. Consultants/Contractors	Depending on nature of consultant or contractor, any details under categories A and B above.

The company strives to uphold good information security practices to avoid uncontrolled communication and/or abuse or misuse of Personal Information through the following measures:

- Physical security controls e.g. finger print scan access
- Network security controls e.g. firewalls
- Access controls to IT systems including password controls
- Protection for viruses and other malware
- Business continuity management and IT disaster recovery procedures
- Confidentiality and non-disclosure undertakings with customers, suppliers and employees
- Maintaining configuration management systems and controls to protect intellectual property and proprietary information

10. Other Records

The following records are maintained at the Head Office of the Company which is situated at the address referred to in paragraph 5 above:

- Finance and accounting records
- Staff employment records
- Business operation records

11. Application for Access to Records

Application for access to the required records must be made in the format set out in **Annexure A** attached hereto and may be posted, faxed or transmitted by electronic mail to the address set out in paragraph 5 above.

12. Fees Chargeable for Access to Records

Depending on the nature of the information to which access is required, the Company reserves the right to charge a fee to cover all reasonable administrative costs incurred by it in providing access to the information requested. The schedule of applicable fees is set out in **Annexure B** attached hereto.

13. Grounds for Refusal of Access to Records

Access to certain records may be denied on the grounds set out in the Act. Grounds for refusal include but are not limited to

- For the protection of the privacy of individuals
- For the protection of commercial information and confidential information of third parties
- Privileged from production in terms of legislation, judgements, determinations and awards.
- Commercial information relating to the companies
- Research information

In the event of such refusal the applicant will be advised within 30 days of the request for access having been received.

14. Applications to Court

In the event of an applicant disputing the right of the Company to refuse access to the required records, the applicant may apply to a court of law for an order directing the Company to grant access to such records in terms of Part 4 Chapter 2 of the Act.

15. Copies of the Manual

Copies of this manual may be obtained from the **Registered Office** of the Company at the addresses referred to in paragraph 4 above or at the **Head Office** of the Company at the addresses referred to in paragraph 5 or on the Company's **Website** referred to in paragraph 5 above.

ANNEXURE A

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:

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:
<p>Mark the appropriate box with an X.</p> <p>NOTES:</p> <ul style="list-style-type: none"> (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 (audio cassette)		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* (stiffy or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? A postal fee is payable.		YES	NO

G. Particulars of right to be exercised or protected

<p>If the provided space is inadequate, please continue on a separate folio and attach it to this form.</p> <p>The requester must sign all the additional folios.</p>

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. 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

ANNEXURE B

Table of Fees

1. The fee for reproduction referred to in section 52(3) of the Act, is as follows:
 - (a) For every photocopy of an A4-size page or part thereof R1.10
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form R0.75
 - (c) For a copy in a computer-readable form on -
 - (i) Stiffy disc R7.50
 - (ii) Compact disc R70.00
 - (d) (i) For a transcription of visual images, for an A4-size page or part thereof R40.00
 (ii) For a copy of visual images R60.00
 - (e) (i) For a transcription of an audio record, for an A4-size page or part thereof R20,00
 (ii) For a copy of an audio record R30.00
2. The request fee payable by a requester, other than a personal requester, referred to in section 54(1) of the Act is R50.00
3. The access fees payable by a requester referred to in section 54(7) of the Act, unless exempted under section 54(8) of the Act, are as follows:
 - (a) For every photocopy of an A4-size page or part thereof R1.10
 - (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form R0.75
 - (c) For a copy in a computer-readable form on
 - (i) Stiffy disc R7.50
 - (ii) Compact disc R70.00
 - (d) (i) For a transcription of visual images, for an A4-size page or part thereof R40.00
 (ii) For a copy of visual images R60.00
 - (e) (i) For a transcription of an audio record, for an A4-size page or part thereof R20.00
 (ii) For a copy of an audio record R30.00
 - (f) To search for and prepare the record for disclosure, for each hour or part of an hour reasonably required for such search and preparation. R30.00
4. The actual postage is payable when a copy of a record must be posted to a requester.

5. For purposes of section 54(2) of the Act, the following applies:
 - (a) Six hours as the hours to be exceeded before a deposit is payable; and
 - (b) one third of the access fee is payable as a deposit by the requester.

Notice of Internal Appeal

6. Notice of an internal appeal, as contemplated in section 75(1) of the Act, must be lodged in the form of Form C of the Annexure.

Appeal fees

7. The appeal fee payable in respect of the lodging of an internal appeal by a requester against the refusal of his or her request for access, as contemplated in section 75(3)(a) of the Act is R50.00.

Value-added tax

8. Public and private bodies registered under the Value-Added Tax Act, 1991 (Act No.89 of 1991), as vendors may add value added tax to all fees prescribed in terms of these regulations.

Commencement

9. These regulations shall come into operation on 9 March 2001.