

PAIA & POPIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 (“PAIA”) and the Protection of Personal Information Act, 4 of 2013 (“POPIA”)

1. COMPANY DETAILS

Green Gain Consulting (Pty) Ltd t/a Ariscu
Registration no. 2002 / 019249 / 07

Green Gain Africa (Pty) Ltd t/a Ariscu
Registration no. 2013 / 125736 / 07

(Hereinafter referred to as “the Company”)

Physical -and Postal Address: 1 Caesars Close
Highveld Ext 7
Centurion
Gauteng, 0169

Telephone: +27 (0) 12 362 6500

Email Address: taniavs@ariscu.com

Website: www.ariscu.com

2. INTRODUCTION

This Manual is prepared in accordance with:

- the Promotion of Access to Information Act, 2 of 2000 (“PAIA”); and
- the Protection of Personal Information Act, 4 of 2013 (“POPIA”).

The purpose of this Manual is to:

- provide a description of the records held by the Company;
- explain how requests for access to records may be made;
- outline how personal information is processed;
- describe the rights of data subjects; and
- ensure compliance with applicable legislation.

3. INFORMATION OFFICER

Information Officer Name: Nicolai Spies Massyn
Position: Managing Director
Telephone: +27(0)12 362 6500
Email: nicolai.massyn@veriforce.com

4. GUIDE ON HOW TO USE PAIA

A guide on how to use PAIA is available from the Information Regulator. Contact details of the Information Regulator:

Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

General enquiries email: enquiries@infoeregulator.org.za

Website: www.infoeregulator.org.za

5. APPLICABLE LEGISLATION

The Company may hold records in terms of the following legislation, where applicable:

- Companies Act 71 of 2008
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Employment Equity Act 55 of 1998
- Occupational Health and Safety Act 85 of 1993
- Income Tax Act 58 of 1962
- Value Added Tax Act 89 of 1991
- Unemployment Insurance Act 63 of 2001
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Protection of Personal Information Act 4 of 2013
- Promotion of Access to Information Act 2 of 2000

6. CATEGORIES OF RECORDS HELD BY THE COMPANY

The Company maintains records including, but not limited to, the following:

Corporate Records

- Company registration documents
- Shareholder records
- Minutes of meetings
- Statutory records

Financial Records

- Accounting records
- Tax records
- Banking records
- Invoices and quotations

Human Resources Records

- Employment contracts
- Payroll records
- Leave records
- Disciplinary records
- Training records

Client and Customer Records

- Contact information
- Contracts and agreements
- Service records
- Communication records

Supplier and Contractor Records

- Supplier agreements
- Payment records
- Due diligence documentation

Health and Safety Records

- Incident reports
- Risk assessments
- Safety inspection reports
- Training registers

Information Technology Records

- System logs
- Access control records
- Backup records

7. PROCESSING OF PERSONAL INFORMATION

Purpose of Processing

The Company processes personal information for purposes including:

- provision of services;
- administration and business operations;
- employment and payroll administration;
- compliance with legal obligations;
- customer support and communication;
- health and safety compliance; and
- security and access control.

Categories of Data Subjects

The Company may process information relating to:

- employees;
- customers;
- suppliers;
- contractors;
- service providers;
- website users; and
- visitors to Company premises.

Categories of Personal Information

The Company may process:

- names and contact details;
- identification numbers;
- banking details;
- employment information including the job title and work history;
- tax information;
- CCTV footage;
- electronic communication records;
- insurance information;
- education and training information;
- geolocation and system data (http requests, IP address, statistical information, OS information
- user actions (logins, changes, data changes, data deletion).

8. RECIPIENTS OF PERSONAL INFORMATION

Personal information may be shared where necessary with:

- government authorities;
- auditors and legal advisors;
- payroll providers;
- IT service providers;
- insurers;
- medical aid or pension administrators;
- regulatory authorities;
- affiliates (legal entities within the group).

The Company takes reasonable steps to ensure that operators and third parties maintain appropriate security safeguards.

9. TRANSBORDER INFORMATION TRANSFERS

The Company may transfer personal information outside South Africa where:

- cloud storage or software services are used;

- international service providers are engaged; or
- business operations require such transfer.

Any such transfers will be conducted in accordance with POPIA.

10. SECURITY MEASURES

The Company implements reasonable technical and organisational measures to protect personal information, including:

- password protection;
- antivirus and firewall protection;
- restricted access controls;
- secure storage of records;
- confidentiality obligations;
- staff awareness and training;
- data encryption;
- data backup;
- system monitoring.

11. RETENTION OF RECORDS

Records are retained:

- for as long as required by law;
- for legitimate business purposes; or
- as necessary to fulfil contractual obligations.

Records that are no longer required are securely destroyed or deleted.

12. REQUEST PROCEDURE UNDER PAIA

A requester seeking access to records must:

1. Complete the prescribed PAIA request form;
2. Provide sufficient details to identify the requested record;
3. Pay any applicable request fee, where required.

Requests may be submitted to:

Email: taniavs@ariscu.com

Physical Address: 1 Caesars Close, Highveld Ext 7, Centurion, Gauteng, 0169

The Company will respond within the period prescribed by PAIA.

13. GROUNDS FOR REFUSAL OF ACCESS

Access to records may be refused on grounds permitted under PAIA, including:

- protection of personal privacy;
- commercial confidentiality;
- protection of safety and property;
- legally privileged information;
- confidential third-party information.

14. DATA SUBJECT RIGHTS UNDER POPIA

Data subjects have the right to:

- request access to personal information;
- request correction or deletion;
- object to processing;
- withdraw consent where applicable;
- lodge complaints with the Information Regulator.

Requests may be directed to the Information Officer.

15. AVAILABILITY OF THIS MANUAL

This Manual is:

- available at the Company's premises; and/or
- published on the Company website, where applicable.

Approved by:

NS MASSYN
MANAGING DIRECTOR



Signature