

Access to Information Manual

We respect your right of access to information. This document will help you exercise that right as required by section 51 of the Promotion to Access of Information Act 2 of 2000 (PAIA).

Contents

Contents	2
Introduction	3
Our details	3
Further guidance	3
Records we hold	3
Company records	4
Business records	4
Financial records	4
Insurance records	5
Income tax records	5
Personnel records	5
Policies and directives	5
Agreements or contracts	6
Regulatory documents	6
Published information	6
Customer information	6
Reference materials	6
Information we hold to comply with the law	7
How to request access	8
Grounds for refusal	8
How we will give you access	8
How much it will cost you	9
How we process and protect personal information	10
Categories of people	10
Purposes	10
Categories of personal information	10
Third-party disclosures	11
Cross-border transfers	11
Security	11
Other prescribed information	11
Availability of this Manual	11
Updates to this Manual	11

Introduction

We are Codeo (Pty) Ltd, we conduct business as a software and consulting services provider, and this is our 'Access to Information Manual'. Its purpose is to help you access our information and any other information that we have. PAIA requires us to make it available to you so that you:

- know what types of information we have; and
- can request access to it.

Our details

Our details are as follows:

- **Company name:** Codeo (Pty) Ltd
- **Registration number:** 2016/503663/07
- **Postal and physical address:** 25A Old Main Road, Clifton Park, Gillitts, 3610
- **Phone number:** 087 231 0230
- **Information officer:** Rohland Lablache de Charmoy
- **Information officer email:** rohland@codeo.co.za
- **Contact email:** hello@codeo.co.za
- **Website:** <https://www.codeo.co.za>

Further guidance

If you would like further guidance on how you can get access to information under PAIA, you may contact the South African Human Rights Commission (SAHRC) to find out more information about PAIA. They have a guide in each official language of South Africa on how to exercise any right under PAIA. In terms of the Section 110 of the Protection of Personal Information Act 4 of 2013 the functions of the Human Rights Commission in terms of the Act have been transferred to the Information Regulator. Their contact details are as follows:

- **Phone number:** 011 877 3600
- **Fax number:** 011 403 0668
- **Postal address:** P.O Box 31533, Braamfontein, Johannesburg, 2017
- **Physical address:** 33 Hoofd Street, Forum III, 3rd Floor Braampark, Braamfontein, Johannesburg, 2017
- **General e-mail:** inforeg@justice.gov.za
- **Complaints email:** complaints.IR@justice.gov.za
- **Websites:** <https://www.justice.gov.za/inforeg/index.html> and <http://www.sahrc.org.za/index.php/understanding-paia>

Records we hold

We hold the following subjects and categories of records:

- **Company records;**
- **Business records;**
- **Financial records;**
- **Insurance records;**

- **Personnel records;**
- **Policies and directives;**
- **Agreements or contracts;**
- **Regulatory documents;**
- **Published information;**
- **Customer information;** and
- **Reference materials.**

Please note that records that are 'not automatically available,' must be requested using the process outlined in the 'How to request access' section of this manual.

Company records

Company records are all our records related to the incorporation and administration of our company. Some of them are available from the Companies and Intellectual Property Commission (CIPC).

Memorandum of incorporation	Automatically available from CIPC
Directors' names	Automatically available from CIPC
Documents of incorporation	Automatically available from CIPC
Minutes of board of directors meetings	Not automatically available
Written resolutions	Not automatically available
Records relating to appointment of directors, auditor, secretary, public officer, or other officers	Not automatically available
Share register and other statutory registers	Not automatically available
Other statutory records	Not automatically available

Business records

Business records include any documents that have economic value to the business.

Operational records	Not automatically available
Databases	Not automatically available
Published works	Not automatically available
Internal correspondence	Not automatically available
Product and services records	Not automatically available

Financial records

Financial records are all our records related to our finances.

Financial statements	Not automatically available (NDA required)
Tax returns	Not automatically available
Other documents relating to taxation of the company	Not automatically available
Accounting records	Not automatically available
Banking records	Not automatically available
Banking details	Automatically available on request
Bank statements	Not automatically available
Electronic banking records	Not automatically available
Paid cheques	Not automatically available
Asset register	Not automatically available
Rental agreements	Not automatically available
Invoices	Not automatically available

Financial agreements

Not automatically available

Insurance records

Insurance records are all our records related to our insurable assets.

Insurance policies held by the company

Not automatically available

Register of all immovable property owned by the company

Not automatically available

Income tax records

Income tax records are all our records related to our income tax obligations.

PAYE Records

Not automatically available

Corporate tax records

Not automatically available

Customs tax

Not automatically available

Documents issued to employees for income tax purposes

Not automatically available

Records of payments made to SARS on behalf of employees

Not automatically available

VAT records

Not automatically available

Regional Services Levies

Not automatically available

Skills Development Levies

Not automatically available

UIF

Not automatically available

Workmen's Compensation

Not automatically available

Personnel records

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

List of employees

Not automatically available

Employee personal information

Not automatically available

Employee employment contracts

Not automatically available

Employment policies and procedures

Not automatically available

Employment Equity Plan

Not automatically available

Medical aid records

Not automatically available

Pension and provident fund records

Not automatically available

Salaries of employees

Not automatically available

Leave records

Not automatically available

Internal evaluations

Not automatically available

Disciplinary records

Not automatically available

Disciplinary codes

Not automatically available

Training records

Not automatically available

Operating manuals

Not automatically available

Personal records provided by personnel

Not automatically available

Other statutory records

Not automatically available

Related correspondence

Not automatically available

Policies and directives

Policies and directives include both internal and external documents.

Internal relating to employees and the company	Not automatically available
External relating to clients and other third parties	Not automatically available
Information technology systems and documents	Not automatically available

Agreements or contracts

Agreements or contracts include the documents themselves and all related documents.

Standard agreements	Not automatically available
Contracts concluded with customers	Not automatically available
NDA's	Not automatically available
Letters of intent, MOUs	Not automatically available
Third party contracts (such as JV agreements, VAR agreements, etc.)	Not automatically available
Office management contracts	Not automatically available
Supplier contracts	Not automatically available

Regulatory documents

Regulatory documents include any documents required to comply with any laws.

Permits	Not automatically available
Licences	Not automatically available
Authorities	Not automatically available

Published information

Published information includes any document that we prepare and produce.

External newsletters, circulars, and blog posts	Automatically available
Internal newsletters and circulars	Not automatically available
Information on the company published by third parties	Not automatically available

Customer information

Customer information includes any information about anyone that we provide goods or services to, including our customers, leads, or prospects.

Customer details	Not automatically available
Contact details of individuals within customers	Not automatically available
Communications with customers	Not automatically available
Sales records	Not automatically available
Systems that process customer information	Not automatically available
Transactional information	Not automatically available
Marketing records	Not automatically available

Reference materials

Reference materials include any sources of information that we contribute to.

Books	Not automatically available
Newsletters	Not automatically available
Magazines	Not automatically available

Newspaper articles

Not automatically available

Information we hold to comply with the law

We hold records for the purposes of PAIA in terms of the following main laws, among others:

- Basic Conditions of Employment Act 75 of 1997;
- Broad Based Black Economic Empowerment Act No. 53 of 2003;
- Companies Act 61 of 1973;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Disease Act 130 of 1993;
- Consumer Protection Act 68 of 2008;
- Copyright Act 98 of 1978;
- Criminal Procedure Act 51 of 1977;
- Electronic Communications and Transactions Act 25 of 2002;
- Employment Equity Act 55 of 1998;
- Financial Intelligence Centre Act 38 of 2001;
- Income Tax Act 58 of 1962;
- Insolvency Act 24 of 1936;
- Insurance Act 27 of 1943;
- Labour Relations Act 66 of 1995;
- Occupational Health and Safety Act 85 of 1993;
- Protection of Personal Information Act 4 of 2013;
- Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002;
- Skills Development Act 97 of 1998;
- Skills Development Levies Act 9 of 1999;
- Unemployment Insurance Act 63 of 2001; and
- Value Added Tax Act 89 of 1991.

How to request access

We have authorised and designated our information officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of PAIA. To request access to a record, please complete Form C which is available from:

- the SAHRC website at <http://www.sahrc.org.za/index.php/understanding-paia> at this link: <http://www.sahrc.org.za/home/21/files/Form%20C.doc%20August%202013.doc>; or
- the Department of Justice and Constitutional Development website at www.justice.gov.za at this link: http://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf.

Please submit the completed form to our information officer together with the relevant request fee (details here: <http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>) at our information officer's email address, our physical address, or by fax in terms of our details provided above. Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address, postal address, or fax number;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form we may:

- reject the request due to lack of procedural compliance;
- refuse it if you do not provide sufficient information; or
- delay it.

Grounds for refusal

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- another company's commercial information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings; or
- research information.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

How we will give you access

We will evaluate and consider all requests to us in terms of PAIA. If we approve your request for access to our records, then we will decide how to provide access to you – unless you have asked for access in

a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

How much it will cost you

You must pay us a request fee as required by law when submitting a request for access to information. The prescribed fees are as set out in the Fee Schedule which is available from <http://www.sahrc.org.za/index.php/understanding-paia> at this link: <http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>. You must pay us the fees before we will hand over any information. You may have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

How we process and protect personal information

We process the personal information of various categories of people for various purposes as set out in this clause.

Categories of people

We process the personal information of the following categories of people:

- customers;
- prospects or leads;
- employees;
- recruiters and medical practitioners providing services related to employees;
- contractors, vendors, or suppliers;
- debtors and creditors; and
- directors and shareholders.

Purposes

We process the personal information to:

- provide our goods or supply our services;
- better understand our data subjects' needs when doing so;
- keep our data subject records up-to-date;
- manage employees in general;
- manage supplier contracts in general;
- manage customers in general;
- manage customer credit in general;
- market to customers in various countries;
- enforce debts;
- market goods and services to prospects;
- process customer requests or complaints; and
- process personal information of employees for forensic purposes.

Categories of personal information

We process many different categories of personal information, including:

- contact details, such as phone numbers, physical and postal addresses, and email addresses;
- personal details, such as names and ages;
- demographic details, such as races and age groups;
- health information;
- biometric information;
- account numbers;
- background information;
- contract information;
- credit information;
- market intelligence information; and
- debt and debtor information.

Third-party disclosures

We give the following people personal information that we process in the ordinary course of business to fulfil our obligations to our customers or clients:

- contractors, vendors, or suppliers;
- agents, distributors, or other resellers;
- operators, other responsible parties, or co-responsible parties; and
- third party vendors to help us maintain our services.

Cross-border transfers

We may send personal information outside of South Africa to various countries. We will only transfer data to other countries who have similar privacy laws to South Africa's, or recipients who can guarantee the protection of personal information to the same standard we must protect it.

Security

We secure our data by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use.

Other prescribed information

The Minister of Justice and Constitutional Development has not made any regulations prescribing any other information that needs to appear in this manual.

Availability of this Manual

This manual is available in English and will be available on our website, and at our company offices. The manual is also electronically available on our website at: <https://www.codeo.co.za/paia.pdf>

Updates to this Manual

This manual will be updated whenever we make material changes to the current information.

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