

Access to Information Policy

**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO. 2 OF 2000 FOR:
Ropes and All cc trading as Stateline Braiding and Cordline**

(Registration number: 2009/016122/23)

INTRODUCTION

Ropes and All cc manufactures and sells braided military and security regalia and yachting, climbing and multi-purpose ropes. This manual has been prepared for the purposes of requesters who seek access to information in terms of the Promotion of Access to Information Act ("the Act"). The manual may be amended from time to time, thereafter the latest version of the manual shall be made available to the public. The requester is advised to contact the information officer whose details have been provided herein for assistance in regard to information requested in terms of the provisions of the Act.

PART I

CONTACT DETAILS (Section 51(1)(a) of the Act)

Name of Body: Ropes and All cc
Registration No: 2009/016122/23
Physical Address: 70 Ramsay Avenue, Mayville, Durban
Postal Address: PO Box 30525, Mayville, Durban, 4058
Head of Body: KG Sobey
Information Officer: KG Sobey
Telephone No: 031 208 8238
Fax: 031 207 5799
Email: saza@iafrica.com
Website: www.stateline.co.za

PART II

GUIDE IN TERMS OF SECTION 10 OF THE ACT (Section 51(1)(b))

In terms of Section 10 of the Act a guide will be compiled by the South African Human Rights Commission ("SAHRC") containing such information as may be reasonably required by a person who wishes to exercise any right contemplated in the Act. Any queries can be directed to:

The South African Human Rights Commission - PAIA Unit
The Research and Documentation Department
Postal Address:
Private Bag 2700
Houghton, 2041
Telephone: +27 11 877-9600
Fax: +27 11 403-0684
Website: www.sahrc.org.za
Email: PAIA@sahrc.org.za

PART III

CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT THE NECESSITY OF A REQUEST IN TERMS OF THE ACT (Section 51(1) (c) of the Act)

No notice in terms of section 52(2) of the Act has currently been published. Certain records are however freely available on Stateline's website .

PART IV

INFORMATION/DOCUMENTS HELD IN ACCORDANCE WITH OTHER LEGISLATION (Section 51(1) (d) of the Act)

Ropes and All cc keeps information/documents in accordance with the following legislation:

- Companies Act No. 61 of 1973
 - Income Tax Act No. 58 of 1962
 - Value-Added Tax Act No. 89 of 1991
 - Basic Conditions of Employment Act No. 75 of 1997
 - Compensation for Occupational Injuries and Diseases Act No.130 of 1993
 - Occupational Health and Safety Act No.15 of 1973
 - Labour Relations Act No. 30 of 1966
 - Unemployment Insurance Act No. 30 of 1966
 - Unemployment Contributions Act No. 4 of 2002
 - Skills Development Act No. 97 of 1998
 - Skills Development Levy Act No. 9 of 1999
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PART V

OTHER DOCUMENTS/INFORMATION HELD BY Ropes and All cc (Section 51(1)(e) of the Act)

Such information as is required for the day-to-day running of Ropes and All cc being company policies, commercial agreements, employee records, licences, permits, insurance policies, financial accounts and records, databases, correspondence, marketing records, internal correspondence, product records, trademark records, statutory compliance records, drawings, specifications, operational records and accounts, business unit accounts and records, supplier and third party records, customer records, records held by officials of the body, including company secretarial records.

Please Note: Access to records may be refused on the grounds set out in the Act.

PART VI

AVAILABILITY OF THE MANUAL (SECTION 51(3))

This manual is available for inspection at the offices of Ropes and All cc, daVinci Building, 23 Calder Road, Mayville, Durban, upon request, during office hours and free of charge. The manual has also been submitted to the South African Human Rights Commission.

ROPES AND ALL CC TRADING AS STATELINE AND CORDLINE

POPIA MANUAL

Background

In compliance with the Protection of Personal Information Act (POPIA) we have put together this manual to give substance to a person's constitutional right to privacy; set out a framework within which a person's information may be lawfully processed; give persons rights and remedies against the unlawful processing of their information; establish measures to promote, enforce, fulfill and ensure respect for the rights protected by POPI.

1. Accountability

As noted above, our intention is **to comply with the eight conditions**. We will be accountable for the personal information of customers and visitors alike that we are processing.

2. Processing Limitation

The first parts of condition 2 are **processing lawfully and with minimality**. Lawfully means that we are processing data in accordance with relevant laws (even outside of POPIA) and minimality refers to only processing the information that we need to process in order to meet our defined purpose. So if we need an email address and name for purposes of our newsletter going out, we don't collect a phone number and postal address *"just in case"*.

This includes:

- Quotes
- Invoices
- Email communication
- Bank details for occasional expense reimbursement

The next part of condition 2 refers to **consent and justification**. This will be done in a manner where customers and visitors agree to our use of such information. At times it will require specific consent and at other times it will be noted on the document, giving the person options.

3. Purpose Specification

The primary section of condition 3 deals with **collection for a specific purpose**. This condition links conditions 2 and 4 into a trifecta that is a vitally important guiding light in terms of data processing across the business. We need to specify a purpose for what and why we are processing information. We can't limit what data we need (condition 2) if we haven't specified what the purpose is for which we're processing.

The second part of condition 3 deals with **retention of information**. In short, once our purpose is complete, we need to get remove or destroy the information. There are exceptions to this though, in that other regulations (such as the Income Tax Act or other regulatory requirements) may require us to keep certain pieces of information for longer.

4. Further Processing Limitation

This condition states that **we cannot process information we've already collected for a purpose other than what we've already stated**. If we are changing our purpose for what we've collected data for we will need to gain consent for this. There are other exceptions, such as for legal action, crime prevention and compliance with tax; but in general we cannot use the information for something new without interaction with our data subjects (members and visitors).

5. Information Quality

The information that we've collected **needs to be up-to-date, complete and not misleading**. This points to keeping our data base clean and current. This may involve sending out regular update requests.

6. Openness

Section 17 of POPIA is one of the most overlooked lines in the act. It states that **we need to maintain documentation of processing activities** in terms of the Promotion of Access to Information Act (PAIA) section 52 (private bodies). This includes our PAIA manual and a record of processing activities. The Record of Processing Activities, or ROPA, is also useful in terms of condition 8.

7. Security Safeguards

The first section deals with **integrity and confidentiality** of information. This means that we need to put in technical safeguards and processes to ensure that information is not leaked (breach of confidentiality) or deleted/modified (breach of integrity). This includes antivirus tools, passwords, locked offices, access control and more.

Next, the act talks about making sure that those processing under our authority (outsourced providers such as payroll) are **doing so with our knowledge and under our instruction**. They must also treat the information with the same care that we do and they must have security safeguards in place too. We need to ensure that our contractors / outsourced providers are obliged to use at least the same security as us when processing data on our behalf.

Lastly it deals with **breach notifications**, where our outsourced providers need to notify us, and we need to notify the regulator and possibly the public when a breach occurs. Once a breach (internal or external) has been brought to our attention we commit to notify the members and visitors whose data has been breached within a period of 7 to 14 days of us becoming aware of the breach. Concurrently, we will notify the POPIA Regulator of such breach.

8. Data Subject Participation

Data subject participation refers to **people having access to their information, as well as being allowed to correct their information**. Access to the information means we need to be able to tell members and visitors what information we have of theirs, what we are doing with it and who we may have shared it with. This is where a Record of Processing Activities (ROPA) comes in really handy.

It also refers to people being allowed to **correct or request the deletion of their information**. Under any conditions of information being inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained illegally, the data subject has the right to request correction or deletion.

We make provision for the customer or visitor (data subject), who has provided adequate proof of identity, to request, if, what and the extent of personal information the business holds about him/her, including third parties the business has shared the Data Subject's personal information with. After receipt by the Information Officer of **Appendix A**, duly completed, this must be done:

- (i) within a reasonable time i.e. seven to fourteen days;
- (ii) at a prescribed fee, if any, that is not excessive, currently Five Rand per page copied or transmitted (this may be waived at the discretion of the Information Officer);
- (iii) in a reasonable manner and format; and
- (iv) in a form that is generally understandable.

Appendix A:

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "X"

Correction or deletion of the personal information about the data subject which is in possession or under the control of Ropes and All cc.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of Ropes and All cc and who is no longer authorised to retain the record of information.

DETAILS OF DATA SUBJECT:

Name:

Address:

Contact Number:

DETAILS OF REQUESTOR:

Name:

Address:

Contact Number:

SIGNATURE:
