



PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

**DATE OF COMPILATION: 01/03/2024
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Contents

DATE OF COMPILATION: 01/03/2024 DATE OF REVISION: 01/03/2025	1
1. LIST OF ACRONYMS AND ABBREVIATIONS	3
3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF 4 ARROWS MINING AND ENGINEERING (PTY) LTD	4
4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE.....	5
5. CATEGORIES OF RECORDS OF 4 ARROWS MINING AND ENGINEERING (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.....	8
6. DESCRIPTION OF THE RECORDS OF 4 ARROWS MINING AND ENGINEERING (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION	8
7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE 4 ARROWS MINING AND ENGINEERING (PTY) LTD	9
8. PROCESSING OF PERSONAL INFORMATION	9
8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto.....	10
8.3 The recipients or categories of recipients to whom the personal information may be supplied.....	11
8.4 Planned transborder flows of personal information.....	11
8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information.....	12
9. AVAILABILITY OF THE MANUAL	12
10. UPDATING OF THE MANUAL	12



1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|--------------------|---|
| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “IO” | Information Officer; |
| 1.4 | “Minister” | Minister of Justice and Correctional Services; |
| 1.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended; |
| 1.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | “Regulator” | Information Regulator; and |
| 1.8 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;



- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3.KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF 4 ARROWS MINING AND ENGINEERING (PTY) LTD

3.1. Chief Information Officer

Name: JAN GUTTER
Tel: 051 407 6600
Email: JANNIE@4AM.CO.ZA

3.2. Deputy Information Officer

WWW.4AM.CO.ZA

3.3 Access to information general contacts

Email: CFO@4AM.CO.ZA

3.4 National or Head Office

Postal Address:

PO BOX 29713, DANHOF, BLOEMFONTEIN

Physical Address:

2 LILVAYE ROAD, RAYTON, BLOEMFONTEIN

Telephone:

051 407 6600

Email:

NOT APPLICABLE

Website:

NOT APPLICABLE

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

- 4.3.1. the objects of PAIA and POPIA;
- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *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 in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.6.1. an internal appeal;
- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

5. CATEGORIES OF RECORDS OF 4 ARROWS MINING AND ENGINEERING (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of records	Available on website	Available on request
Marketing Material	Brochures, newsletters, promotional material, and advertising		X
Company Documents	Published annual reports, company profile, and publicly available statutory records.		X
Policies	Health & safety policies or public-facing, non-confidential policies.		X
Employment	Advertised vacancies or positions.		X

6. DESCRIPTION OF THE RECORDS OF 4 ARROWS MINING AND ENGINEERING (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000



7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE 4 ARROWS MINING AND ENGINEERING (PTY) LTD

Subjects on which the body holds records	Categories of records
Strategic documents, plans and reports	Annual reports; strategic plans; operational plans; policies
Human resources	HR policies; advertised posts; employee records; training and
Finance	Budgets; invoices; financial statements; tax records; audit
Supply chain / procurement	Supplier records; quotations; tenders; purchase orders;
Operations	Standard operating procedures; service records; project files;
Legal / compliance	Agreements; legal opinions; compliance registers; litigation
IT and information management	System records; access logs; backup records; security incident records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Personal information is processed by the Company for the purpose of conducting and managing its business operations, fulfilling contractual obligations, complying with applicable laws, administering employment relationships, maintaining financial and operational records, safeguarding assets and information, and communicating with customers, suppliers, employees, and other stakeholders.



8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Names and surnames; company names; identity numbers or registration numbers; contact details; physical and postal addresses; billing details; bank details; tax or VAT numbers where applicable; account records; correspondence; transaction history; complaints and query records
Prospective Customers / Enquirers	Names; contact details; addresses; service requirements; quotations issued; communications and enquiry records
Employees	Names and surnames; identity numbers; contact details; addresses; date of birth; gender; nationality; qualifications; employment history; references; payroll information; bank details; tax numbers; leave records; performance records; disciplinary records; next-of-kin details; benefit information
Job Applicants / Candidates	Names; contact details; CVs; identity numbers; qualifications; employment history; references; interview notes; background screening results where lawful
Directors / Shareholders	Names; identity numbers; contact details; addresses; company positions; shareholding information; declarations and statutory records
Suppliers / Service Providers / Contractors	Names and surnames; company names; contact details; registration numbers; VAT numbers; addresses; banking details; contracts; invoices; compliance documents; correspondence
Website Users / Marketing Contacts	Names; email addresses; phone numbers; online identifiers; IP addresses; website usage data; cookie-related information where applicable; marketing preferences; consent records
Visitors to Premises	Names; identity numbers where required; contact details; vehicle registration details; access records; CCTV footage where applicable
Complainants / Requesters / Correspondents	Names; contact details; addresses; complaint or request details; supporting documents; correspondence; outcomes and internal notes



8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity numbers, names and contact details, for identity verification and compliance checks	Verification agencies; government departments; regulatory authorities; South African Police Service where lawfully required
Qualifications, licences and professional memberships, for verification purposes	South African Qualifications Authority; professional bodies; background screening service providers
Credit, payment and account history, for credit assessment and debt management	Credit bureaus; debt collection agencies; attorneys; payment service providers
Banking and financial information, for payments and financial administration	Banks; payment processors; accountants; auditors
Employee information, for payroll and employment administration	Payroll administrators; pension/provident fund administrators; medical aid administrators; labour consultants
Recruitment and applicant information, for vetting and hiring purposes	Background screening providers; qualification verification agencies; recruitment platforms; referees
Customer or client records, for service delivery and account administration	Internal authorised staff; outsourced administrators; CRM providers; legal advisers
Supplier and contractor information, for procurement and payment purposes	Procurement staff; finance staff; banks; auditors; legal advisers
Address and delivery information, for fulfilment or correspondence	Couriers; postal service providers; logistics providers
CCTV footage, visitor records and access-control information, for security purposes	Security service providers; property managers; law enforcement authorities where required by law
IT and electronic usage information, for hosting, support and security	Cloud hosting providers; IT support providers; cybersecurity service providers; forensic investigators
Legal, complaint and dispute records	Attorneys; advocates; insurers; courts; tribunals; regulators
Tax and statutory compliance information	SARS; CIPC; auditors; regulators; other authorities where disclosure is required by law
Marketing and communication information, where lawfully processed	Marketing agencies; email/SMS communication platforms; CRM providers

8.4 Planned transborder flows of personal information

Some personal information may be stored in the cloud outside the Republic.



8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Safeguards implemented to ensure the confidentiality and integrity of the personal information, include Data Encryption; Anti- virus and Anti-malware Solutions.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on WWW.4AM.CO.ZA, if any;

9.1.2 head office of 4 ARROWS MINING AND ENGINEERING (PTY) LTD for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of 4 ARROWS MINING AND ENGINEERING (PTY) LTD will on a regular basis update this manual.

Issued by



**JAN GUTTER
DIRECTOR**