

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF
THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 (“PAIA”)
PRIVATE BODY MANUAL (applicable to our South African entities only)

1. CONTACT DETAILS OF THE PRIVATE BODY

- 1.1. **Name of Body:** Adapt IT Holdings Proprietary Limited (“Adapt IT”)
- 1.2. **Physical Address:** Adapt IT Johannesburg Campus
152, 14th Road, Midrand, Gauteng, South Africa
- 1.3. **Postal Address:** Same as physical address
- 1.4. **Telephone:** +27 (0) 10 494 0000
- 1.5. **Head of Body:** Tiffany Dunsdon (CEO)
- 1.6. **Designated Information Officer:** Eddy Lekhuleni
- 1.7. **Title:** Senior Manager: Governance, Compliance and Regulatory
Risk - Group Shared Services
- 1.8. **Telephone:** +27 (0) 21 200 0480
- 1.9. **Email:** dataprivacyofficer@adaptit.com
- 1.10. **Who we are:** Adapt IT is a provider of leading specialised software and digitally-led business solutions that assists clients across targeted industries to achieve more.

2. SECTION 10 GUIDE

- 2.1 The Information Regulator has compiled a guide in terms of Section 10 of the Protection of Personal Information Act 4 of 2013. The guide is available in each official language of South Africa and describes how to exercise your rights under PAIA. The guide can be accessed on the Information Regulator’s website: [PAIA guide](#).

The Information Regulator’s contact details are as follows:

- 2.1.1. **Physical address:** JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001
- 2.1.2. **Postal address:** P.O Box 31533
Braamfontein

Johannesburg

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- 2.1.3. **Telephone:** 010 023 5200
- 2.1.4. **Website:** www.inforegulator.org.za
- 2.1.5. **General Email:** enquiries@inforegulator.org.za
- 2.1.6. **Complaints Email:** PAIAcomplaints@inforegulator.org.za

3. SECTION 52(2) NOTICE

No notice has been published.

4. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Insofar as may be applicable, the group keeps records of information to the extent required in terms of, inter alia, the following legislation:

- 4.1. Basic Conditions of Employment Act 75 of 1997;
- 4.2. Broad Based Black Economic Empowerment Act No.53 of 2003;
- 4.3. Companies Act 71 of 2008;
- 4.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- 4.5. Consumer Protection Act 68 of 2008;
- 4.6. Copyright Act 98 of 1978;
- 4.7. Criminal Procedure Act 51 of 1977;
- 4.8. Electronic Communications Act 36 of 2005;
- 4.9. Electronic Communications and Transactions Act 25 of 2002;
- 4.10. Employment Equity Act 55 of 1998;
- 4.11. Financial Intelligence Centre Act,38 of 2001;
- 4.12. Income Tax Act 58 of 1962;
- 4.13. Insolvency Act 24 of 1936;
- 4.14. Insurance Act 27 of 1943;
- 4.15. Intellectual Property Laws Amendment Act 38 of 1997;
- 4.16. Intellectual Property Laws Amendment Act 28 of 2013;
- 4.17. Labour Relations Act66 of 1995;
- 4.18. Medical Schemes Act 131 of 1998;
- 4.19. Occupational Health and Safety Act 85 of 1993;
- 4.20. Prevention & Combating of Corrupt Activities Act 12 of 2004;
- 4.21. Prevention of Organised Crime Act 121 of 1998;

- 4.22. Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000;
- 4.23. Protection of Personal Information Act 4 of 2013;
- 4.24. Regulation of Interception of Communications and Provisions Communications-related Information Act 70. of 2002;
- 4.25. Skills Development Act 97 of 1998;
- 4.26. Skills Development Levies Act 9 of 1999;
- 4.27. Tax Administration Act 28 of 2011;
- 4.28. Trade Marks Act 194 of 1993;
- 4.29. Unemployment Insurance Act 63 of 2001;
- 4.30. Unemployment Insurance Contributions Act 4 of 2002; and
- 4.31. Value-Added-Tax Act 89 of 1991.

5. COMPANY RECORDS

- 5.1. No notice has been submitted to the Minister of Justice and Constitution Development regarding the categories of records which are available without a person having to request access in terms of s52(2) of PAIA. The information on the website of the business, however, is automatically available without having to request access in terms of PAIA.
- 5.2. General information about Adapt IT can be accessed via the internet on www.adaptit.com, which is available to all persons with access to the internet.
- 5.3. Company Records Classification Key:

Classification Number	Access	Classification
1	May be disclosed	Public access document
2	May not be disclosed	Request for, or after commencement of, criminal or civil proceedings [s7]
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information that belongs to the requester of that information [s61]
5	May not be disclosed	Unreasonable disclosure of personal information of natural person [s63(1)]
6	May not be disclosed	Likely to harm the commercial or financial interests of third party [s64(a)(b)]
7	May not be disclosed	Likely to harm a third party in contract or other negotiations [s64(c)]
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement [s65]
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property [s66]

Classification Number	Access	Classification
10	May not be disclosed	Legally privileged document [s67]
11	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks [s64(3)]
12	May not be disclosed	Commercial information of private body [s68]
13	May not be disclosed	Likely to prejudice research and development information of the Adapt IT or a third party [s69]
14	May not be refused	Disclosure in public interest [s70]

5.4. Summary Records Availability:

Departmental Records	Subject	Classification Number
Communications and Corporate Affairs Division	Current Product Information	3
	Public Corporate Records	1
	Media Releases	1
Environmental Division	Environmental Policy	1
	Environmental Records	11, 14
Human Resources Division	Employee Records	4, 5, 8, 9
	Employment Contracts	4, 5, 8
	Personnel Guidelines, Policies and Procedures	13
	Employee Medical Records	4, 5, 8, 9
Financial Division	Financial Statements	1
	Financial and Tax Records (Company and Employees)	1, 8
	Asset Register	1
	Management Accounts	13
Legal / Company Secretarial Division	General Contract Documentation	6, 10, 13
	Company Guidelines, Policies and Procedures	10, 13
	Trade Marks	3
	Statutory Records	1
Marketing and Sales Division	Market Information	13
	Product Brochures	1
	Marketing and Product Strategies	13

	Product Sales Records	13
	Customer Information and Customer Database	5, 6, 9
Quality	Quality Records	13

6. PURPOSE OF PROCESSING OF PERSONAL INFORMATION

We process personal information to:

- 6.1. provide our goods or supply our services;
- 6.2. better understand our data subjects' needs when doing so;
- 6.3. keep our data subject records up-to-date;
- 6.4. manage employees in general;
- 6.5. manage supplier contracts in general;
- 6.6. manage dealer relationships in general;
- 6.7. manage customers in general;
- 6.8. manage customer credit in general;
- 6.9. market to customers in various countries;
- 6.10. enforce debts;
- 6.11. market goods and services to prospects;
- 6.12. to engage with investors and the media;
- 6.13. process customer requests or complaints; and
- 6.14. process personal information of employees for forensic purposes.

7. CATEGORIES OF PERSONAL INFORMATION

We process many different categories of personal information, including:

- 7.1. contact details, such as phone numbers, physical and postal addresses, and email addresses;
- 7.2. personal details, such as names and ages;
- 7.3. demographic details, such as races and age groups;
- 7.4. health information;
- 7.5. biometric information;
- 7.6. account numbers;
- 7.7. background information;
- 7.8. contract information;
- 7.9. credit information;
- 7.10. market intelligence information; and
- 7.11. debt and debtor information.

8. DATA SUBJECT CATEGORIES

We process different categories of personal information, including:

- 8.1. customers or organisations;
- 8.2. prospects or leads;
- 8.3. employees;
- 8.4. recruiters and medical practitioners providing services related to employees;
- 8.5. contractors, vendors, or suppliers;
- 8.6. children and their guardians;
- 8.7. debtors and creditors; and
- 8.8. directors and shareholders.

9. PLANNED RECIPIENTS OF PERSONAL INFORMATION

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:

- 9.1. law enforcement;
- 9.2. statutory authorities;
- 9.3. tax authorities;
- 9.4. financial institutions;
- 9.5. medical schemes;
- 9.6. employee pension and provident funds;
- 9.7. industry bodies;
- 9.8. contractors, vendors, or suppliers;
- 9.9. agents, distributors, or other resellers;
- 9.10. operators, other responsible parties, or co-responsible parties; and
- 9.11. third party vendors (such as software developers) to help us maintain our services.

10. PLANNED TRANS-BORDER FLOWS OF PERSONAL INFORMATION

10.1. 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.

10.2. For more information on this, please see our [privacy policy](#).

11. SECURITY

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

12. THE REQUEST PROCEDURE

12.1. Forms and fees

12.1.1. A request for access to information must be made in the prescribed form, addressed to the Information Officer and submitted with the [prescribed fee](#).

12.1.2. To request access to a record, please complete Form 02, which is available on the website of the Information Regulator: <https://info regulator.org.za/paia-forms/>

12.2. Form of request

12.2.1. The requester must use the prescribed form to make the request for access to a record. This request must be made to the address or electronic mail address of the information Officer and must contain the requester's postal address within South Africa.

12.2.2. The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record requested and the requester. The requester should also indicate which form of access is required. The requester should indicate if notice of the decision of the Information Officer is required in any manner, other than in writing, and if so, the necessary particulars to be so informed.

12.2.3. In the request form, the requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

12.2.4. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

12.3. Fees

12.3.1. A requester who seeks access to a record containing personal information about that requester, is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee.

12.3.2. The Information Officer must by notice, require the requester to pay the [prescribed fee](#), if any, set out in the notice, before further processing the request.

12.3.3. The requester may complain to the Information Regulator or lodge an application with a court against the payment of the prescribed request fee.

12.3.4. After the Information Officer has made a decision on the request, the requester must be notified in the required form.

12.3.5. If the request is granted then a further [access fee](#) must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.

13. REMEDIES

If request for access is denied, the requester may:

- apply to a court with appropriate jurisdiction, or

- lodge a complaint with the Information Regulator, for the necessary relief within 180 days.

14. AVAILABILITY OF THE MANUAL

This manual is available for inspection by the general public upon request during office hours and free of charge at Adapt IT's physical address as well as on Adapt IT's website, www.adaptit.com

15. UPDATES TO THIS MANUAL

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